

## **TfL's supplementary Response to 100 Avenue Road CMP – 28/08/18**

Firstly please note that these comments supplement rather than replace my previous email to you on behalf of TfL from 19 June 2018 (attached). They also do not represent the views of London Underground (LU) Infrastructure Protection, who should be consulted separately via 'Location Enquiries' [SMBLocationEnquiries@tfl.gov.uk](mailto:SMBLocationEnquiries@tfl.gov.uk). It will be necessary for the applicant to maintain ongoing contact with our LU colleagues throughout their construction project, particularly for subsurface monitoring. I understand from discussions in meetings with the applicant and their representatives that this has already been taking place and will continue.

Thanks for reconsulting TfL with supplementary information provided by the developer Essential Living's transport consultant Peter Brett Associates, which was prepared in response to queries by your recent Planning Committee. The supplementary information (or 'Technical Note') provided relates to the number of vehicles expected from construction activities, site access options including use of Winchester Road, and temporary changes to Bus Stop D on Avenue Road.

Subject to the outcome of a forthcoming Judicial Review, we now expect Cycle Superhighway 11 (CS11) to commence construction by the end of September 2018. The applicant and Council should therefore work to this timescale and adjust both procurement and logistics planning for the construction project accordingly.

The new Technical Note submitted reflects my assertion in previous comments that a huge amount of work has been done to investigate various alternative site access options, and I wish to reiterate that TfL is satisfied the applicant is now proposing a workable access strategy for construction which would result in limited disruption to the local community and transport network.

The site of the proposed development is on Avenue Road A41, which forms part of the Transport for London Network (TLRN). The TLRN makes up 5% of the city's roads, but carries up to 30% of traffic. TfL is the highway authority for the TLRN, and is therefore concerned about any proposal which may affect its performance and/or safety. We must ensure our network of strategic highway can continue to play its critical role in keeping London moving. Whilst car use in central London is falling and further decreases in car travel are being pursued across London as part of the new Mayor's Transport Strategy (MTS), it is also expected that an extra 5 million trips per day will take place on London's roads by 2030 on top of the 30 million daily trips already taking place today, primarily due to construction, freight and population growth.

The Technical Note also acknowledges that the Winchester Road / Eton Avenue construction access was actually consented in principle for all construction vehicles as part of the original planning determination (p. 4). At that stage, no construction access impacts were proposed on the TLRN. Had exclusive or close to exclusive use of the TLRN been proposed at that time, it is likely that TfL would have objected to the planning application and/or requested mitigation to minimise the expected impact on London's strategic highway network, and our CS11 project.

Due to this, TfL welcomes the construction programme having been revised to account for and ensure the operating hours of the construction site will be those requested by TfL, with access only outside peak congestion periods (i.e. 7 hours between 0930 and 1630 hrs Monday to Friday).

The Technical note also acknowledges the Pit Lane agreed with TfL along the A41 would have an operational capacity for just two standard construction vehicles or one articulated HGV (p. 8).

Furthermore, any blocking back by construction vehicles into the Bus Lane is likely to delay local bus services. Vehicles diverted away from the site on the TLRN will also contribute to traffic congestion.

It may therefore be advisable to maintain a construction vehicle route and access via Winchester Road and Eton Avenue throughout the build, as a contingency option. The Council should consider whether the impacts in Winchester Road and Eton Avenue are significant enough to justify extending the overall programme and risking more disruption to bus and LU passengers and the TLRN, especially considering the status of the A41 as one of London's strategic highway routes. We would prefer for as much flexibility as possible to be afforded to TfL and the applicant to manage safety and operational issues as and when they arise, especially given that co-ordination of the CS11 and 100 Avenue Road construction projects taking place at the same time in close proximity will obviously be very challenging.

We request that the Council considers this issue carefully, appreciating that TfL has engaged positively in joint working with both the applicant and Council, and agreed a Pit Lane on the A41 to support delivery of the development despite no such access featuring in the original planning proposal, and the obvious difficulties that will be caused to us in both our role as a statutory highway authority and our efforts to improve London's cycling network.

TfL has not undertaken technical assessment of any 'No CS11' proposals at this stage. Should CS11 experience further delays, this matter would need to be revisited. I will therefore be happy to provide further comments on behalf of TfL if necessary following the Judicial Review.