The Camden (Torrington Place to Tavistock Place) (Prescribed Routes, Waiting and Loading Restrictions and Loading Places) Traffic Order [2017]

# **Summary Transport Proof of Evidence**

for

Imperial London Hotels Limited





## **Document Control Sheet**

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The Camden (Torrington Place to Tavistock Place) (Prescribed Routes, Waiting and Loading Restrictions and Loading Places) Traffic Order [2017]

Imperial London Hotels Limited

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### Preamble

- 1.1 My name is John Norman Russell. I am a Chartered Transport Planner, being a Chartered Member of the Institute of Logistics and Transport (CMILT) and a Member of the Institution of Highways and Transportation (MIHT). I have an Honours Degree in Civil Engineering. I am a Technical Director of Motion Limited, highway consultants., based in Duncannon Street, London.
- 1.2 I am instructed to appear in this inquiry on behalf of Imperial London Hotels Limited (ILHL). My evidence is presented in support of ILHL's objection to the to the Camden (Torrington Place to Tavistock Place) (Prescribed Routes, Waiting and Loading Restrictions and Loading Places) Traffic Order [2017] ("the Order").

### Pedestrian Improvements

- 1.3 Footway widening forms part of the proposed Order works and such widening will improve the level of service experienced by pedestrians along the corridor. ILHL therefore does not take issue with this element of the Order which may have the potential to benefit pedestrians.
- 1.4 The footway widening and potential benefits can be delivered whether the Order is implemented in accordance with the Trial or with the Trial modified so that the permitted movement of vehicular traffic is reversed to be westbound only.

### **Cycling Improvements**

- 1.5 I acknowledge that the provision of wider cycle lanes represents an enhancement in the level of service experienced by cyclists along the corridor. ILHL therefore does not take issue with this element of the Order which has the potential to benefit cyclists.
- 1.6 These cycle infrastructure improvements and potential benefits, however, can be delivered whether the Order is implemented in accordance with the Trial or with the Trial modified so that the permitted movement of vehicular traffic is reversed to be westbound only.

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#### **Council's Statement of Case**

1.7 In their Statement of Case, the Council claims:

"7.1 The rationale behind not providing a continuous eastbound or westbound link between Tottenham Court Road and Hunter Street is to avoid attracting 'through traffic' and more strategic motor traffic from the Transport for London Road Network (Euston Road) onto the more local road network."

1.8 Contrary to this statement, my analysis of the traffic surveys undertaken before and during the Trial suggest that very little traffic has transferred onto the Euston Road. Instead the majority has simply displaced onto adjacent local streets. To the best of my knowledge the Council has collected no data to support their statement that there was significant "through traffic" prior to the Trial or that the volume of "through traffic" has changed during the Trial.

"7.2. The volume of motorised traffic has reduced as a result of the trial layout as 'through traffic' is unable to use the Corridor to gain access from Tottenham Court Road to Hunter Street and vice versa."

1.9 My analysis of the traffic surveys undertaken before and during the Trial suggest that whilst the volume of traffic on the Corridor has reduced as a result of the Trial, this traffic has simply displaced onto adjacent local streets.

> "7.3. The comparative traffic impact of the trial compared with potential alternatives has been assessed with the aid of traffic modelling undertaken by transport consultants (Systra) appointed by Camden."

- 1.10 While modelling has been undertaken, my evidence demonstrates that I have found:
  - 1. simple errors in the coding of the model;
  - 2. potential errors in the data used to calibrate the model; and



- 3. that there is insufficient data made available by the Council to determine if the model is fit for the purpose of assessing the Trial and the alternatives to the Trial. I have requested this data which is all typical information that I would expect would be available for a strategic model. At the time of preparing my evidence I was waiting on a response this request.
- 1.11 In the absence of the information requested it is not possible to determine whether the Council's traffic modelling is or has been fit for the purpose of assessing the impacts of the Trial and the alternatives. In these circumstances the Council's claimed outputs from the traffic modelling need to be treated with caution.
- 1.12 I have been presented with a number of model plots by the Council showing outputs from the modelling work that they have had undertaken. These flag up apparent discrepancies between how the model is predicting that traffic will re-route and what the Council's own traffic survey data is indicating regarding driver behaviour. Notwithstanding this, the modelling presented to me by the Council shows that reversing the flow of traffic along Torrington Place / Tavistock Place westbound compared to eastbound with the Trial would result in a significantly smaller geographic spread of traffic impacts and with the number of local streets suffering from a material increase in traffic volumes being fewer than with the Trial in place.

"7.4. The conversion of the carriageway from two-way working to one-way working for motor traffic inevitably changed some traffic patterns in the area. Removing traffic from the corridor appears to have displaced some motor traffic to Endsleigh Gardens as this a natural desire line for vehicles to link to Euston Road forming an alternative westbound route."

1.13 As regards this statement, my analysis of traffic survey data shows that "some" means a doubling of traffic volumes in the westbound direction on Endsleigh Gardens. A similar magnitude of increase is also experienced westbound on Great Russell Street which the Council fails to acknowledge.



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7.8. Early indications from draft collision data suggest an increase in accidents involving cyclists, but that the severity of injuries has reduced, with none reported as 'serious'.

1.14 In fact, the evidence demonstrates that injury accidents involving cyclists have increased by 50% during the first 12-months of the Trial compared to the average annual number of cycle accidents on the four years leading up to the Trial. My analysis identifies that the single largest causation factor is cyclists travelling westbound colliding with traffic turning right across their paths. This could be alleviated by reversing the flow of traffic to reduce the incidence of right turning traffic in the circumstances where loading bays previously located along the Corridor have all been located to the south in the Trial forcing vehicles to turn right to reach them.

7.17. Some other feedback from public engagement showed there were concerns with lack of taxi drop off and pick up areas and that this was discriminatory against disabled people using taxis. The Council have incorporated a dedicated taxi rank along the route enabling taxi's to arrive at the kerb side so disabled users can use the disabled loading facilities on this side of the vehicle.

1.15 The taxi rank outside the Tavistock Hotel has been retained. However as I set out in my evidence, due to the configuration of taxis and the direction of traffic flow of the Trial, wheelchair users arriving by taxi are required either to exit the taxi into the live cycleway or else they are dropped remotely by the kerbside and required to work their way back to the entrance. Were the flow of traffic along the Corridor reversed then wheelchair users arriving by Taxi would be able to exit safely directly into the footway.

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- 1.16 I also recommend that should the Inspector conclude that the Order should be made, the design of the Taxi bay is altered when the scheme is made permanent such that a bay is formed partially within the widened footway outside the Tavistock Hotel. This would benefit cycle safety by removing Taxis from most of the cycle lane. The taxi bay is currently located within the westbound cycle lane which is dangerous to both cyclists and taxi users.
- 1.17 I also note that having regard to the operation of the signals at the Woburn Place / Tavistock Square junction, in order to access the taxi bay with the current configuration of the Corridor, taxis turn right into platoons of on-coming, westbound cyclists as both movements have a green signal at the same time. My conclusion is that were traffic travelling in the westbound direction, interactions between taxis and cyclists at the taxi rank would reduce to the benefit of road safety for cyclists.

"8.1 Throughout the design process different design options were considered. At the outset of the project the options considered included (amongst other options):

a. Eastbound traffic only along the whole corridor

b. Westbound traffic only along the whole corridor

c. Timed closure (closed to traffic between 7am and 7pm)

d. Widening the bi-directional track and retain two-way traffic

e. Removing all traffic aside from access for residents and servicing

8.3 The assessment of the remaining options resulted in the preferred option as set out in section 3 being identified and taken forward as the trial scheme."

1.18 Contrary to this statement my evidence demonstrates that the Council did not consider any alternative options prior to the Trial scheme being implemented other than one which restricted vehicular traffic movements to one-way in an eastbound direction.

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8.7 A suggestion has also been made that the one-way vehicular traffic flow should be reversed so that it runs in a westbound direction. Broadly speaking this could achieve one objective of reducing motor traffic along the corridor, but a comparative modelling exercise indicated a greater level of reassignment to more local roads.

1.19 Contrary to this statement, my evidence, based on information provided to me by the Council, demonstrates that reversing the flow of traffic along Torrington Place / Tavistock Place compared to the Trial would result in a significantly smaller geographic spread of traffic impacts and with the number of local streets suffering from a material increase in traffic volumes being fewer than with the Trial in place.

#### Conclusion

- 1.20 Based on the information that is available to me and the analysis of this information set out in my evidence, I conclude that the Council did not undertake an assessment of alternative options and is only now, in the face of a Public Inquiry, beginning to assess alternative options to the Trial. Had such an assessment been undertaken prior to finalising the Trial scheme, in my professional opinion the Council would have concluded that if the Corridor were to be made one-way for vehicular traffic in order to cater for improvements for pedestrians and cyclists, then the direction of travel for vehicular traffic that would result in least impact would be westbound only.
- 1.21 I accordingly invite the Inspector, on the strength of the evidence available, to recommend that the Council does not make the Order but trials a westbound only scheme and carries out an assessment of its traffic effects and of the air quality effects of the Trial scheme and the westbound scheme on the study area as a whole for comparative assessment purposes.
- 1.22 In the alternative and in the light of the acknowledgement in Appendix D 2.1.2 (CD6/2)

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"removing one direction of motor traffic from the Torrington Place to Tavistock Place 'corridor' (the corridor) would increase the usable width potentially available for pedestrians and cyclists while providing an adequate lane width for motor traffic in a single direction; and that this would be the case "in its current configuration [eastbound motor traffic only] or reversed [westbound motor traffic only]"; and

"that the proposal to reverse the direction of the one-way motor traffic flow in the corridor posed 'no major geometric design changes' to the ETO layout"

1.23 I would urge the Inspector to recommend the 'modification' of the Trial scheme to provide for westbound motor traffic only and its confirmation with that traffic arrangement.