



8<sup>TH</sup> Sept 2020

## **CPT RESPONSE TO PROPOSALS FOR STRAND AND ALDWYCH**

**The Confederation of Passenger Transport UK is the trade association of the bus and coach industry, representing over 1000 operators including large bus and coach companies and numerous small and medium enterprise (SME) companies.**

### **Introduction**

**As an industry, we welcome any balanced proposals which will improve travel in the Capital, enhance the environment, making it more attractive and appealing to Londoners and visitors alike.**

**As noted in our response to the previous consultation on this scheme in March 2019, it is without question that there are issues in the Strand/ Aldwych area which can be addressed and CPT fully supports the broader aims, however we would once again welcome confirmation that the scheme considers the needs of all stakeholders and that the final result not only delivers the desired benefits to the area, but also makes it fit for purpose. There are a number of matters in particular we would raise.**

### **General**

Tourism is an integral part of London's economy and the coach industry plays a major role in the transport infrastructure that supports it, providing travel links, particularly for groups, those with impaired or restricted mobility and those who have particular needs requiring special attention - children and visitors for whom English isn't their first language for instance, all of which supports the City's tourism and commerce.

CPT broadly supports any measures which will reduce congestion, allow traffic to flow freely, improve air-quality and increase the efficiency of transport in the capital by focussing the limited road space on those modes which can make the greatest contribution to these aims.



## **The Proposals**

With regard to the proposals, CPT would wish to raise the following general points:

- CPT applauds all efforts to improve the urban realm of the Capital and it is beyond doubt that this particular locality fails to live up to the expectations of visitors. Whilst welcoming efforts to improve this, we would seek assurances that these changes will not in any way serve to disadvantage visitors, to prominent facilities in the wider area, the theatres, retail, hospitality and entertainment in Covent Garden etc.
- In considering the role of the coach industry in servicing the needs of the theatres, cultural centres and leisure facilities, CPT would wish to highlight the part that coaches play in providing safe, environmentally friendly, practical and affordable transport to visitors from across the globe. They offer a safe, secure and easily controlled travelling environment for potentially vulnerable customers such as children, those for whom English is not their first language and high profile groups. This has made coaches their travel mode of choice. Never has this been more appreciated than it is now when Covid risks which can be much more effectively controlled on a chartered coach than on public transport are taken into account. Other factors such as accessibility and ease of baggage handling are also critically important, making ease of access to facilities such as hotels crucial. Again, minimising the handling and potential for cross infection is of paramount importance.
- CPT endorses the general principle of improving the urban realm of the Capital, providing a safer and more appealing environment for pedestrians and cyclists and accepts the need to reallocate a proportion of available road space to achieve this.
- The A4 (Strand/ Aldwych) is still a key artery connecting the City of London with Westminster, all the more so since the reduction in road space along the Embankment. Alternatives to using this are limited and as it appears that the capacity for through traffic will be restricted as a result of these proposals, we would welcome confirmation that either this is not the case, or the mitigations which are planned to overcome this. If the route capacity is restricted, the impact on businesses in all sectors could be hugely significant.

## The proposals

Dealing with the specific proposals of the traffic orders themselves, we would wish to comment on the following areas specifically:

### ***Coach Parking in Kingsway – potential loss of amenity***

The Kingsway coach bays have proved to be of value not only to coaches with customers visiting the theatres and cultural venues in the immediate vicinity, but also those slightly further afield in Camden, Southwark, Lambeth and the City of London, as well as in Westminster. CPT has made on-going representations that the time restrictions applicable to the use of these bays have served to ensure this value has never been maximised and it's disappointing to see that this potential has not been included in the proposals under consideration here. We would therefore seek inclusion of two things:

- Absolute confirmation here is no question of the coach parking facility being reduced as a result of these proposals. Whilst we understand that the sections of carriageway beyond the area of the orders are beyond the scope of this consultation, confirmation of this would be welcome particularly as the plans suggest that only 16m North and 34.5m southbound will remain. As Appendix A suggests, this is significantly less than that which currently exists.
- That the decision not to consider the removal of the peak time exclusion of parking (before 10am and between 4pm-7pm) is reviewed and that this is included in the scheme. This was first discussed with City of Westminster in 2015 and an agreement in principle to extend the hours of operation through the peak periods we understood had been reached, subject to any required consultation process. The cost of this together with the associated traffic orders, appeared to be the only issue preventing this having taken place previous to now and CPT would urge that these changes to Kingsway are included in this overall scheme.

We understand from the initial discussions during the consultation period that the traffic modelling has been based on two lanes Southbound during the peaks, though it's unclear whether this is also the case Northbound. As the images in appendix A show, both North and Southbound carriageways are currently marked as bus lanes which on account of the overhanging trees, only single deck buses can actually use. As this precludes buses on all bar one route (which is Southbound only) from using this carriageway and as the only traffic which can use would be taxis and cycles, it would appear to be a wholly inefficient use of space that could be utilised. This is particularly apparent during the evening peak on the Northbound carriageway when a substantial proportion of the traffic originating from Waterloo Bridge (including the 521 bus service) bypasses the stretch as it uses the underpass.



We would also seek consideration of the bays being opened to overnight parking. As the bays have little residential accommodation in close proximity, they could serve to help alleviate the chronic shortage of overnight coach parking in Central London which currently threatens the market for theatre themed short breaks, a revenue stream which supports both the cultural and hospitality industries. As the recovery for the entertainment and hospitality sector in London will initially be based around a much higher proportion of domestic demand, this is a great opportunity to help kick-start that sector by encouraging more groups from the home market and to encourage travel by what is regarded as the most environmentally friendly mode of motorised road transport.

#### ***Access to Drury Lane – Additional journey time and distance implications***

The changes to access Drury Lane from Aldwych for westbound traffic have the potential to increase journey times and more critically, result in significant additional traffic along Kemble St and adjacent side streets as coaches approach from Aldwych westbound serving Theatreland via the bays in Russell St, will be routed via Kingsway and Kemble St. Whilst this is already a recognised route, given the largely residential nature of Kemble St, any increase in traffic such as would likely result from this would inevitably result in it becoming an issue.

#### ***Access to/ from Catherine St – Additional journey time and distance implications***

Whilst the change at the junction with Aldwych and the creation of exit only, has benefits, we would highlight that the removal of any option for traffic to return to the Strand Westbound or Waterloo Bridge Southbound, will result in substantial additional journey times and mileage for larger vehicles for which the exit via Tavistock St or Exeter St is unsuitable. We would welcome acknowledgment not only that this could be an issue and would welcome discussions on any measures which could be implemented to mitigate this impact.

Re-location of the Russell St bays may be one option to consider and we would be happy to engage on this possibility.

We would also highlight the need for kerb lines and street furniture which are to be modified as a result of the changes to allow for the maximum length of large, commercial vehicles to safely navigate.



### ***Catherine St bus stands***

It is disappointing that the bus stands previously in use for the now defunct RV1 have not been considered for expansion of the coach facilities to serve Theatreland. These bays have been used by coaches since the RV1 was discontinued and they became unused by TfL buses (as we understand it, the traffic orders in place did allow this) and we're not aware of any issues arising as a result. Whilst we would refer to the difficulties the new arrangements for Catherine St and the lack of any access to Strand/ Waterloo Bridge may cause, it is widely recognised that there is a lack of parking for the coaches which serve central London attractions and this will restrict the contribution that the industry can play in generating footfall to the entertainment and retail sector in the area.

CPT would urge is consideration is given to these bays being re-classified for the use of coaches or alternatively that alternative locations are considered, which could involve re-location of the Russell St bays.

### ***Kerbside access to the London School of Economics – loss of amenity***

CPT are aware that coach access to the LSE is required for both Student and Academic groups, for Conferences and Events in particular. Whilst the Kingsway bays generally serve the purpose for this, timings and availability often require the use of the yellow lined areas on Aldwych. The wide road space makes these particularly suitable. CPT notes the designation of "Dual-Use Bays" on the Eastern arm of Aldwych, Eastbound and we would request clarification of the permitted use of these bays and suggest that coaches be permitted if the current proposal doesn't allow this.

We would also request that the loading bay on Aldwych Eastern Arm, Eastbound is designated as a "mixed use" bay. This arrangement has been implemented successfully elsewhere and would be of benefit at this location.

### ***Kerbside Access to Waldorf Hotel – loss of amenity***

The proposals remove all access to the Waldorf Hotel for vehicles other than local buses or taxis, something which will be a huge blow to the high spending tour, corporate and conference group clients who use the hotel and travel to other venues by coach.

CPT would urge that the existing yellow lined area is retained which will allow customers of all modes of transport to board and alight as close as possible to the hotel entrance. It is unacceptable that one mode should be favoured over another in this way.



This kerbside is also used on occasions by coaches servicing the Novello and Aldwych Theatres, particularly when passengers with impaired mobility are being carried.

### **Summary**

Whilst this project has great merit in unlocking the prosperity of an under-utilised area of the Capital, we would urge consideration of the changes outlined, those relating to Kingsway coach parking and the access to the Waldorf Hotel in particular, and that the plans draw a fairer balance across the interests of all stakeholders.

CPT is of course willing and available to discuss any aspect of the proposals, the consultation or our response and we look forward to hearing more on this in the near future.

Kind regards

A handwritten signature in black ink, appearing to read 'AW', followed by a period.

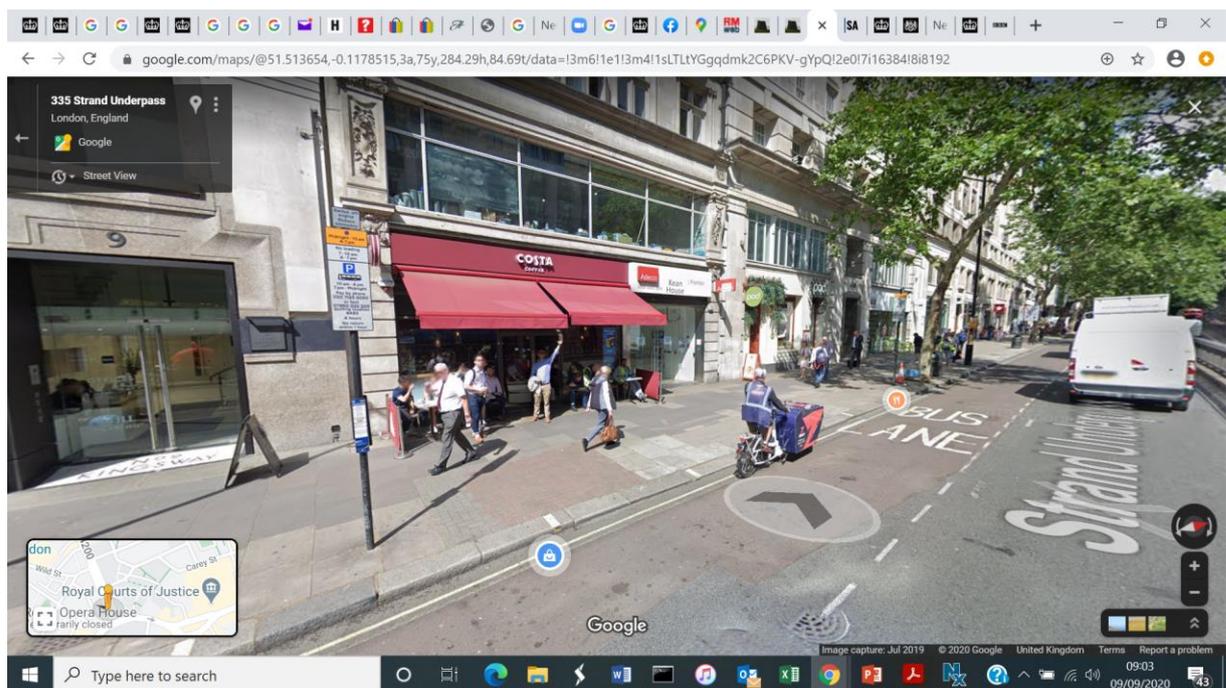
Andy Warrender  
Coaching Manager  
Confederation of Passenger Transport

## APPENDIX A

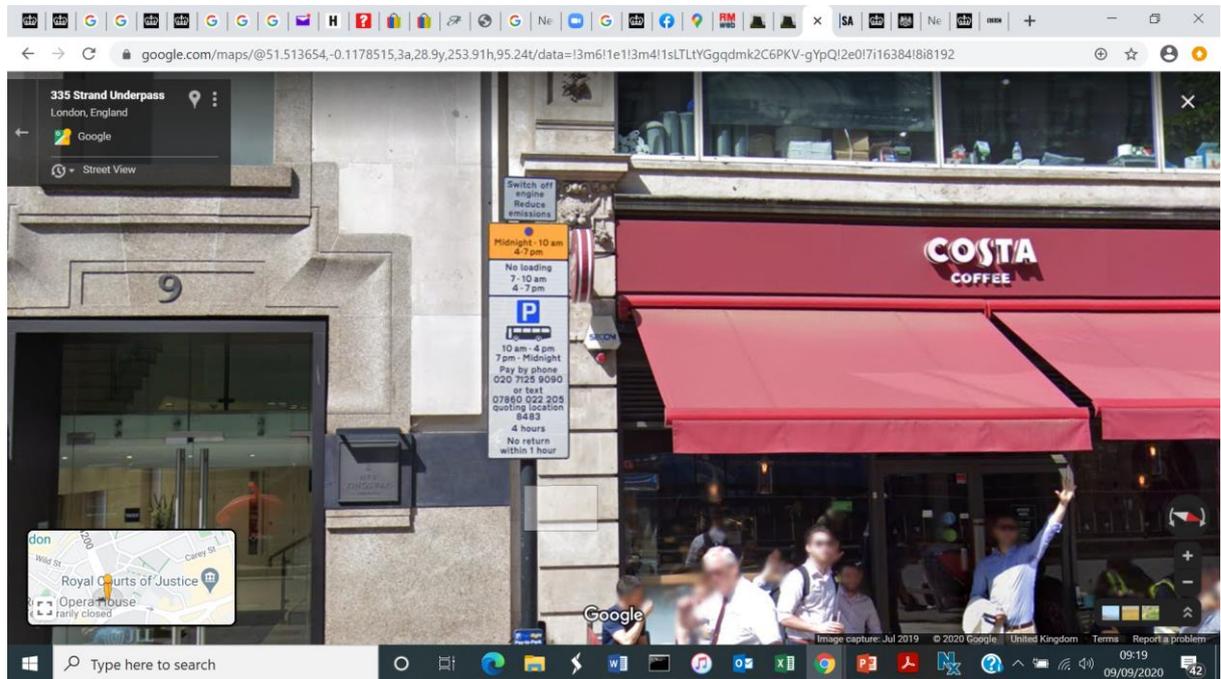
### Kingsway Southbound – Jct Sardinia St



### Kingsway Northbound – approx 50m north of the Aldwych jct.



## Kingsway Northbound - coach bay signage



## Kingsway Northbound – Approx 120m North of the Aldwych Jct

