

# HANOVER SQUARE PUBLIC REALM IMPROVEMENT SCHEME

## APPENDIX E: TRAFFIC ORDERS

### Responses and Comments on the Advertised Traffic Management Orders (TMOs)

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#### Background

On the 8<sup>th</sup> January 2018, Councillor Robert Davis MBE DL, Deputy Leader and Cabinet Member for Business, Culture and Heritage; the Leader of the Council on behalf of Councillor Danny Chalkley, Cabinet Member for City Highways; Councillor David Harvey, Cabinet Member for Environment, Sports and Community; and Councillor Tim Mitchell, Cabinet Member for Finance, Property and Corporate Services, made an executive decision to allow officers to consult on the traffic management changes in Hanover Square and connecting streets proposed as part of the Hanover Square public realm scheme.

The extent of the letter consultation included the three local ward councillors, three local residents' associations, 41 statutory bodies and 410 frontagers. 12 responses were received, as detailed in the appendix attached below.

Formal consultation on the Traffic Management Orders (TMO's) followed 2 previous rounds of public consultation and ward and Cabinet Member engagement. Cabinet Members agreed the concept design for Hanover Square, which set out the proposed pedestrianisation of the west side of the square, in September 2016.

In November 2016 and again in April 2017, local ward members along with the local community and key stakeholders, were invited to attend a series of drop-in sessions to find out more about the scheme and provide feedback. A separate servicing survey was undertaken to identify the servicing needs of occupiers of properties around the square and in connecting streets.

The dedicated website for this scheme has been updated regularly throughout the scheme development process and includes plans and visualisations of how the final scheme is intended to look. A dedicated email address has been in use throughout this process. Further meetings have been held with individual stakeholders/individuals and key stakeholders are represented at the Hanover Square Project Board and Advisory Board.

A number of issues raised through the TMO consultation process had been raised in previous rounds of consultation and as such have already been addressed through the design development process. Comments received in response to the TMO are set out below, with WCC officer responses to them attached.

## APPENDIX

NAME and ADDRESS	OBJECTIONS / COMMENTS / SUPPORT	OFFICERS' COMMENTS
<p>Mr [REDACTED] [REDACTED] London, [REDACTED]</p> <p>Email dated 23<sup>rd</sup> January 2018</p>	<p>1. [Mr [REDACTED], Mr [REDACTED] and Mr [REDACTED] have submitted identical responses to the proposed provision of motorcycle parking spaces in Hanover Square.]</p> <p>The respondents note the alterations (and the addition of six motorcycle bays over the existing - 6.1 metres). However, they state there is still not enough motorcycle parking included in the proposals. There is always a surplus of demand over provision and an extra six places will not resolve this.</p>	<p>1. Mr [REDACTED], Mr [REDACTED] and Mr [REDACTED] request for more motorcycle parking over the proposed additional six spaces is noted. However, the City Council consider that the provision of six additional spaces is sufficient.</p> <p>The City Council is continually monitoring the impact of schemes and seeks the most effective ways to balance motorcycle and car user's needs.</p>
<p>Mr [REDACTED] [REDACTED] London, [REDACTED]</p> <p>Email dated 24<sup>th</sup> January 2018</p>	<p>They state the City Council should be encouraging motorcycles as a low pollution, low congestion form of transport over that of cars (increase of six spaces or 34.7 metres). Surely this is in contravention of Westminster's policy of reducing car parking and congestion. If two parking spaces were converted to motorcycle bays this would provide a further 11.6 metres of motorcycle parking equating to a further 11 spaces and still allow for an extra four car spaces over the current provision.</p>	<p>The provision of 10 taxi spaces in St. George Street is necessary due to the relocation of the Cabmen Shelter from the northern arm of Hanover Square. These spaces will be "refreshment ranks" for taxi drivers and cannot be used to pick up passengers. Prior to the Crossrail works, there was previously a rank in the western arm of the Square.</p>
<p>Mr [REDACTED] [REDACTED] London, [REDACTED]</p> <p>Email dated 24<sup>th</sup> January 2018</p>	<p>The respondents are also not sure that an increase of 16 taxi bays is a useful and warranted allocation of 84.7 metres of space.</p>	<p>The provision of the taxi rank on the southern arm of Hanover Square (Brook Street East) is considered necessary due to the increase in pedestrian footfall following the opening of the new station entrance in the north-western corner of the Square.</p>

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NAME and ADDRESS	OBJECTIONS / COMMENTS / SUPPORT	OFFICERS' COMMENTS
<p data-bbox="203 228 616 534">[REDACTED]</p> <p data-bbox="203 571 616 603">Email dated 25<sup>th</sup> January 2018</p>	<p data-bbox="651 236 1361 416">2. [REDACTED] has no objections to the proposed plans but has made the following recommendations to parking due to the high rate of motorcycle and cycle theft from central London locations.</p> <p data-bbox="728 459 1330 564">Open parking areas should have good natural surveillance and/or CCTV coverage and must, as a minimum, have either:</p> <ul data-bbox="728 571 1361 1054" style="list-style-type: none"> <li>• One ground anchor per moped, scooter or motorcycle (at the rear of the bay to secure the back wheel) certified to Secured by Design, Sold Secure Gold or Thatcham standards; or</li> <li>• A robust motorcycle support stand e.g. hoops consisting of galvanised steel bars (minimum thickness 3mm), with minimum foundation depths of 300mm with welded anchor bars. This will allow mopeds, scooters and motorcycles to be secured using multiple security points including back wheels and frames.</li> </ul> <p data-bbox="728 1098 1361 1241">If the above is unachievable then a robust metal fence along the footpath with the hoops built into the frame facing the bays which will allow users to secure their mopeds / motorcycles safely.</p> <p data-bbox="728 1248 1361 1391">Local businesses could be encouraged to “sponsor” an area of this fencing which could be used as advertising space therefore off setting some of the cost to have the fencing fitted. This</p>	<p data-bbox="1388 236 2098 341">2. The City Council will take [REDACTED]'s recommendations regarding motorcycle and bicycle security into consideration.</p> <p data-bbox="1464 384 2098 416">New lighting is proposed throughout the square.</p> <p data-bbox="1464 459 2098 603">The City Council will monitor the effectiveness of the measures following implementation, after which permanent security measures will be installed.</p>

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NAME and ADDRESS	OBJECTIONS / COMMENTS / SUPPORT	OFFICERS' COMMENTS
	<p>will also be a great opportunity to get the local community involved in crime prevention and making a contribution to the local area.</p> <p>The lines separating the bay from the main highway should be clearly visible and clearly define what the area is and its use.</p> <p>The new motorcycle bay should be well lit, with LED lighting that has a 40% uniformity across its entire length, no dark spots should be allowed and any foliage from the nearby trees should not hamper the light spread covering the area also it should complement the CCTV.</p> <p>CCTV - The area does have a number of lamp posts which can be utilised to have "commando sockets" fitted to allow for CCTV to cover the area. This is highly recommended due to the amount of crime the previous motorcycle bay has generated and the current lack of CCTV does not aid any police investigation to identify suspects or any vehicles used in the removal of stolen mopeds. Signage warning about the use of CCTV should be clearly visible to discourage illegal behaviour.</p> <p>Once the new bay is completed [REDACTED] recommends the City Council, in conjunction with the local Police NPT, should hold a crime prevention event to educate users on the best</p>	

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NAME and ADDRESS	OBJECTIONS / COMMENTS / SUPPORT	OFFICERS' COMMENTS
	<p>way to secure their moped / motorcycle during the morning and evening rush hours. He noticed that some mopeds were secured with cycle locks which are inadequate for the job of security. He believes this period of educating the users will benefit in reducing the crime surrounding this area.</p> <p>Cycle stands should be should be placed in similar location as described above and the user should have the ability to lock their cycle using three points of contact (both wheels and frame). The minimum requirements for such equipment is a galvanised steel bar with a minimum thickness of 3mm. Minimum foundation depth of 300mm with a welded 'anchor bar'. Compliance can be demonstrated by products certified to LPS 1175 Issue 7.2 (2014) rating 1 or 2, or alternatively Sold Secure (Bronze, Silver or Gold).</p> <p>Consideration should be given due to the increase in moped enabled crime being committed in the location and the risks of having no high kerbs between the road and pedestrian areas. Moped theft snatches will see the suspects mount the pavement to commit the crime so therefore making it even easier for them to move from road to pedestrian zones will increase the risk. Suitable barriers or objects positioned along such parts of the development</p>	

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NAME and ADDRESS	OBJECTIONS / COMMENTS / SUPPORT	OFFICERS' COMMENTS
	<p>could be considered especially if they are more vulnerable than other areas.</p>	
<p>██████████ ██████████ Email dated 26<sup>th</sup> January 2018</p>	<p>3. ██████████ is aware, principally in his capacity as ██████████, that there are significant plans with the over-station development being undertaken by GPE in the north-west corner of the Square, which are partially funded by the Planning obligations associated with that development and partially by TfL. He is also aware that there are larger aspirations to improve the Square, for which other parties are contributing and to which a CIL allocation has been made.</p> <p>He requests confirmation whether the scheme as now proposed is the full scheme, and whether it takes into account the proposed changes associated with bus movements anticipated as part of the Oxford Street Transformation Scheme.</p> <p>██████████ notes that it is proposed to make the east side of Hanover Street [Hanover Square] two-way and is concerned that if buses are still using this route to get to any bus stand that may be retained on Harewood place, that it makes such access quite tight.</p> <p>In the legend, there is no explanation as to the grey or beige areas shown on the plan. He asks</p>	<p>3. Officers replied to ██████████ 8<sup>th</sup> February 2018, stating that the measures take into account the proposed changes associated with bus movements as part of the Oxford Street scheme. Buses currently use the eastern arm of Hanover Square to access Harewood Place and Cavendish Square. Transport for London (TfL) has confirmed that the bus stands in Harewood Place are no longer required. Therefore, it is proposed to replace the existing bus stand in Harewood Place with a loading bay, to help servicing needs at set times without obstructing pedestrian flows.</p> <p>The grey and beige shading on the plan has been used to highlight and differentiate between areas of carriageway and paved footway spaces. The dark grey areas show public highway which is to be open to vehicular traffic at all times.</p> <p>It is proposed to lay a uniform border of York-stone paving around the outside of the Square, against the building line, to provide a level accessible route for pedestrians all the way around the Square. This is shown in beige on the plan. Darker paving is proposed elsewhere on the pavement around the Square and in Tenterden Street.</p>

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NAME and ADDRESS	OBJECTIONS / COMMENTS / SUPPORT	OFFICERS' COMMENTS
	<p>what their use is and what materials will be used for the pavements and highways.</p> <p>He looks forward to receiving a more detailed presentation of the proposals, and confirmation that the full cost for undertaking the works is available. He also requests details of the timing of the scheme, and temporary traffic arrangements during its construction.</p>	<p>Officers provided [REDACTED] with details of the costs, funding and timings of the project.</p>
<p>[REDACTED]</p> <p>Email dated 12<sup>th</sup> February 2018</p>	<p>4. [REDACTED] thanks the City Council for their response and update. He notes that the proposals are part of the larger scheme and hopes that full funding will be available to achieve this.</p> <p>[REDACTED] has raised a concern in relation to the proposed works in St. George Street and the request that it not merely be returned to a car park following the removal of the Crossrail site huts etc. Whilst [REDACTED] understands the needs to balance the provision of limited kerbside space, it would certainly improve the setting seen from the south side of the Square if any parking in the centre of St. George Street could be minimised, or better still, eliminated.</p>	<p>4. A taxi refreshment rank, to replace the one previously located on the north-west side of the square is proposed to be relocated to the centre of St. George Street.</p> <p>The provision of 10 taxi spaces in St. George Street is necessary due to the relocation of the Cabmen Shelter from the northern arm of Hanover Square. These spaces will be "refreshment ranks" for taxi drivers and cannot be used to pick up passengers. .</p> <p>The provision of the motorcycle parking places in St. George Street is necessary to offset the loss of motorcycle facilities from Hanover Square.</p>
<p>[REDACTED]</p>	<p>5. Hanover Street, Hanover Square (east side) and Harewood Place are existing bus routes. This is subject to change as a result of the Oxford Street West scheme.</p>	<p>5. WSP replied to [REDACTED] on 28<sup>th</sup> February 2018 providing tracking for all of the movements highlighted in [REDACTED] email and details of the lane widths.</p>

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NAME and ADDRESS	OBJECTIONS / COMMENTS / SUPPORT	OFFICERS' COMMENTS
<p>[REDACTED]</p> <p>Email dated 28<sup>th</sup> January 2018</p>	<p>St. George's Street (both directions) and Brook Street (eastbound) are existing bus diversion routes.</p> <p>However, it is essential to Bus Service Delivery that all of the above roads are retained as diversion routes in order to provide resilience on the bus network for planned and unplanned road closures and events.</p> <p>In order to retain the diversions, the following movements are required:</p> <ul style="list-style-type: none"> <li>• The ahead movement from Brook Street eastbound onto Hanover Square (south side).</li> <li>• The right turn from St. George's Street northbound onto Hanover Square (south side).</li> <li>• The left turn from Hanover Square (south side) onto Hanover Square (east side).</li> <li>• The left turn from Hanover Square (south side) onto St. George's Street southbound.</li> <li>• The right turn from Hanover Street onto Hanover Square (east side).</li> <li>• The left turn from Hanover Square (east side) onto Hanover Square (north side).</li> <li>• The right turn from Hanover Square (north side) onto Harewood Place.</li> </ul> <p>[REDACTED] requests the City Council provide swept path drawings to confirm that a 12 metre</p>	<p>These drawings show that the manoeuvres can be accommodated. There is some straddling of opposing lanes but it has been noted these areas would have very low traffic flow. There would be minimal traffic travelling southbound in the eastern arm of the Square.</p> <p>For the right turn into Harewood Place, the design allows for significant space on the east side to demonstrate that a future southbound cycle lane can be accommodated, if necessary as part of the Oxford Street West proposals.</p>

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NAME and ADDRESS	OBJECTIONS / COMMENTS / SUPPORT	OFFICERS' COMMENTS
	<p>rigid bus will be able to make all of the above movements.</p> <p>She also requests confirmation of the widths of the running lanes on each of these roads.</p>	
<p>[REDACTED]</p> <p>Email dated 9<sup>th</sup> March 2018</p>	<p>6. [REDACTED] thanks WSP for providing the tracking. She is comfortable that buses can make the manoeuvres but is concerned about the straddling of the opposing lanes. She notes that traffic flows are low, but asks for specifics.</p> <p>She is also concerned regarding the narrow lanes on the east side of the Square. Coaches and Heavy Goods Vehicles (HGVs) currently use this route, and presumably will continue to, so she is concerned about the conflict between passing vehicles. Some buses are 3.2 metres side, wing mirror to wing mirror and coaches and HGVs are probably similar.</p>	<p>6. See above.</p>
<p>[REDACTED]</p> <p>Email dated 4<sup>th</sup> February 2018</p>	<p>7. <u>Over provision of parking bays on St. George Street</u></p> <ul style="list-style-type: none"> <li>• Proposals for the above will “overtax” the street detrimentally and without regard of the impact of increased parking and loading spaces on residents.</li> <li>• Present provisions already cause noise and air pollution on the street. Cars and motorcycles spend time cruising up and down the street looking for spaces, with resultant</li> </ul>	<p>7. The provision of 10 taxi spaces in St. George Street is necessary due to the relocation of the Cabmen Shelter from the northern arm of Hanover Square. These spaces will be “refreshment ranks” for taxi drivers and cannot be used to pick up passengers. Prior to the Crossrail works, there was a similar rank in the western arm of the Square.</p>

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<b>NAME and ADDRESS</b>	<b>OBJECTIONS / COMMENTS / SUPPORT</b>	<b>OFFICERS' COMMENTS</b>
	<p>exhaust fumes and considerable noise. Provision of further parking spaces for cars and motorcycles will only exacerbate these problems.</p> <ul style="list-style-type: none"> <li>The noise from motorcycles is a particular problem unaddressed by the Council. They cause inordinate noise pollution and providing so many bays in the middle of St. George Street ignores the impact on the area, environment and residents.</li> </ul> <p><u>Provision of loading bays on St. George Street</u> Large vehicles loading and unloading on St. George Street for nearby cafés and restaurants (e.g. Itsu, Eat, Pret a Manger) already causes a great deal of noise for residents. This often occurs very late into the night, sometimes as late as 11.00 p.m., and due to the need to keep the refrigeration on for long periods while the vehicles are being unloaded, plus the clattering and clanging of very large delivery cages being loaded and then wheeled up the street, the noise is very loud and an intrusion on residents' living in the area.</p> <p>Providing bays in the middle of the street will only add to the problem as it will become a magnet for vehicles unloading for other eating establishments surrounding Hanover Square as well as for the large hotel being constructed at the corner of Brook Street and Hanover Square.</p>	<p>The provision of the motorcycle parking places in St. George Street is necessary to offset the loss of motorcycle facilities from Hanover Square.</p> <p>Vehicles will not be permitted to load / unload in the taxi refreshment ranks or the motorcycle parking places in the centre of the carriageway.</p> <p>Five loading bays will be introduced in the area, including two in the southern arm of Hanover Square. Two loading bays have also recently been introduced in Brook Street.</p> <p>The City Council is continually monitoring the impact of schemes and seeks the most effective ways to balance residential, business and visitor needs.</p> <p>Proposals for the closure of Oxford Street are being considered.</p> <p>The City Council is ensuring coordination between the Hanover Square project team and the Oxford Street team to ensure coordination and collaboration between the two schemes. The Oxford Street scheme is currently under consultation. The Hanover Square scheme has been designed to ensure revisions can be made in the future, if necessary.</p>

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	<p><u>Outdoor Car Park</u> The proposals would turn St. George Street into an outdoor car park for shared use, disabled use, diplomatic use, motorcycle use parking and commercial loading.</p> <p>Little if any thought has been given to the impact on residents, and office workers, who are already subjected to noise and pollution from cars and motorcycles, as well as large lorries using the street for parking.</p> <p><u>Oxford Street</u> Proposals for the closure of Oxford Street should also be considered in these plans, as not only will traffic increase on St. George Street, attempts to find parking spaces will likewise increase. More cars and motorcycles will cruise down St. George Street once such increases in bays are known.</p> <p><u>Alternatives</u> There are alternatives around the area. For example, it would be as convenient, and as viable to move the motorcycle bays onto Curzon Street. This would certainly cut down the noise and pollution for residents on St George Street.</p> <p>Loading and unloading bays should be provided nearer to cafés and restaurants, e.g. Hanover</p>	<p>The proposals for the east and west sides of St. George's Street largely match the existing arrangements, with shared use bays proposed for the east side and south-west sides of the street and disabled and diplomatic bays proposed for the north-west side – as existing.</p> <p>The City Council is seeking to improve conditions and provide a fair distribution of parking bays across Mayfair.</p> <p>The designs for Hanover Square have been developed in consultation with the local resident and business community.</p> <p>The City Council has sought to develop this scheme to meet local needs, whilst accommodating the new Crossrail station and other new developments within the square.</p> <p>The top end of St. George Street will be modified under the current scheme to provide an improved crossing for pedestrians.</p> <p>Officers will be keeping proposals and options for the side streets, including Princes Street, under review.</p> <p>The City Council cannot require suppliers and retailers to use smaller vehicles.</p>

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NAME and ADDRESS	OBJECTIONS / COMMENTS / SUPPORT	OFFICERS' COMMENTS
	<p>Street for Itsu and Pret a Manger, Brook Street for Eat and Princes Street for Starbucks etc. The proposals already include a loading bay in front of the large Pret a Manger on Harewood Place and one on Brook Street presumably for Fenwick's and the new hotel, so it is perfectly feasible to allow one loading bay on Princes Street for Starbucks, and one on Hanover Street for Itsu and Pret a Manger.</p> <p>If the City Council required suppliers and restaurants / cafés to use smaller vehicles (which was the case until the middle of last year) it would be easier to manage parking in designated bays. Now huge delivery vans are used which cause an inordinate amount of noise only because establishments have decided to consolidate deliveries throughout London. The City Council has not taken into consideration not only the impact on residents as mentioned above, but the impact on the roads from such enormous vehicles.</p> <p>██████████ believes the proposals have not considered the needs, rights and comfort of Westminster residents on St. George Street who are already subject to and impotent in the face of inconvenience and noise pollution from parking and loading.</p>	

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<p>[REDACTED]</p> <p>Email dated 9<sup>th</sup> February 2018</p>	<p>8. [REDACTED] believes that the location shown for the relocated cabman shelter and refreshment ranks is what has been agreed in principle.</p> <p>However, the finer point of the relocation of the cabman shelter (which is listed) needs to be discussed further with the Cab Shelter Fund. The main contact is the [REDACTED].</p> <p>TfL request that consideration is given for the proposed loading bay in Tenterden Street to become a dual-use loading bay / taxi rank with the taxi rank hours of operation at night e.g. between 10.00 p.m. and 3.00 a.m.</p>	<p>8. WSP replied to [REDACTED] on 9<sup>th</sup> February 2018 to confirm that the consultation documents were also sent to [REDACTED] in the post and by email. No response from the Cab Shelter Fund has been received. Separate meetings have also been held with [REDACTED], Historic England and specialist heritage consultants.</p> <p>Tenterden Street will become a busy area with a high number of pedestrians expected to be using the new station entrance. Therefore, the proposals seek to minimise the number of vehicles in this area.</p> <p>A taxi rank (three spaces) is proposed on the southern arm of Hanover Square, in direct view of pedestrians exiting the station. An additional taxi rank (three spaces) has also recently been introduced in Brook Street, just west of this location.</p> <p>Tenterden Street is not proposed to be open to through traffic at any time.</p> <p>The City Council will monitor the effectiveness of the measures following implementation and opening of Crossrail in light of demand.</p>
<p>[REDACTED]</p>	<p>9. The [REDACTED]</p>	<p>9. The City Council welcomes [REDACTED]'s support for the Hanover Square scheme.</p>

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NAME and ADDRESS	OBJECTIONS / COMMENTS / SUPPORT	OFFICERS' COMMENTS
<p>[REDACTED]</p> <p>Email dated 9<sup>th</sup> February 2018</p>	<p>[REDACTED]</p> <p><b>Introduction</b>            As an industry, [REDACTED] welcomes any balanced proposal which will enhance the environment in the Capital, making it more attractive and appealing to Londoners and visitors alike. It is without question that there are improvements which can be addressed and [REDACTED] fully supports these broader aims.</p> <p>As an introduction, they wish to highlight the substantial contribution made to the Capital's public transport network made by their members. As well as the substantial contribution to the TfL Bus network, coaches operated by their members provide links from the capital to a huge number of destinations around the UK, many operate from areas which are poorly served by rail and for which there are no viable alternatives, practically or economically.</p> <p>The tourist coach industry is an integral part of London's transport infrastructure, providing travel links, particularly for groups and those with impaired or restricted mobility, and those who have particular needs requiring special attention, children or those for whom English</p>	<p>The measures will still allow coaches to pick up and set down passengers in the area, as they currently do.</p> <p>The City Council is always available for discussions about coach parking.</p> <p>The shared-use parking spaces on Hanover Street and St. George Street are for use by resident permit holders or for paid-for parking by visitors to the area.</p> <p>The City Council is continually monitoring the impact of schemes and seeks the most effective ways to balance residential, business and visitor needs.</p> <p>Whilst officers do not accept that dedicated coach parking should be provided as part of this scheme at the expense of other uses, residents and pedestrians.</p> <p>The City Council will continue to work with TfL officers on coach provisions across the West End to address the points raised.</p>

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	<p>isn't their first language for instance, all of which supports the Capital's tourism and commerce.</p> <p><b>Coaches and the London Tourist Economy</b>            In order to fully confirm the contribution tourist coaches make to the London economy, [REDACTED] commissioned renowned transport consultant, [REDACTED] to produce a report on the benefits of coach tourism to the London economy, this revealed that:</p> <ul style="list-style-type: none"> <li>• Coaches carry around 13m tourists to London annually.</li> <li>• Those customers contribute a spend in the region of £1.3bn annually.</li> </ul> <p>Key areas where coaches contribute to London:</p> <ul style="list-style-type: none"> <li>• A substantial proportion of London Theatre customers arrive by coach.</li> <li>• Coaches are the most practical and popular means of transporting groups of vulnerable individuals into and around London, particularly the elderly, the young and those for whom English is not their first language.</li> <li>• Around 75% of school groups visiting Theatres, museums and other attractions arrive by coach.</li> <li>• Coaches have impressive environmental credentials; emissions across all elements per passenger / km are among the lowest of any mode of road transport and they reduce the road space occupied per passenger by</li> </ul>	

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	<p>around 70% compared with taxis or private cars.</p> <ul style="list-style-type: none"> <li>Typically a EuroVI bus or coach has NOx emission levels comparable to many private cars of similar age.</li> </ul> <p>Coaches also provide the vital logistical links for a huge number of visitors who arrive by air - principally through the four main London airports - and also by sea via the cruise ship terminals at Dover, Tilbury, Harwich and Southampton which are totally reliant on coaches to maintain the tight schedules which are essential if cruise lines are to be able continue to include London in European itineraries.</p> <p><b>Hanover Square</b> The proposals for Hanover Square do raise a number of questions affecting the commerce and tourism in the area which we believe are worthy of further consideration.</p> <p>Hanover Square has a long established role in the transport fabric of London, accommodating facilities supporting coaches, taxis and most recently of course, the Elizabeth Line. The overall proposals outlined are undoubtedly positive, bringing change to the area and add to the undoubted attraction this iconic location has.</p> <p>█ does not believe however that the</p>	

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	<p>functional role of the Square should be sacrificed in any proposals for improvement.</p> <p>The extensive construction requirements of the Elizabeth Line have necessitated temporary changes, long term in their nature, but temporary nonetheless. These included the temporary suspension of the coach parking bays in the Square. These bays were well patronised, being the most convenient location for the significant number of coaches which serve the retail and entertainment attractions in the vicinity, predominantly the London Palladium and of course Oxford Street. They note that the proposals include no indication of the need to reinstate these bays in their previous location, or to offer any alternative.</p> <p>█ believes this is not only failing to maintain the undertakings given when these bays were temporarily removed, but fails to recognise the opportunity of enhancing facilities for what is widely recognised as the most environmentally sound means of travel by road, one which is favoured by millions of visitors each year. Changing patterns of transport together with competing uses have placed pressure on kerbside space. Additionally development has removed off-street facilities at a time when tourism in the capital is showing significant and sustained growth. As █ have highlighted on</p>	

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	<p>many occasions, the provision of even the most basic of facilities has not only failed to keep pace with growing demand, but has contracted significantly.</p> <p>In the period these bays were suspended, coach traffic has been forced to use yellow lined areas on Regent Street, Maddox Street, Hanover Square and to a limited degree, Hanover Street to set-down and pick-up passengers. [REDACTED] are aware of the issues this can cause for drivers who have to balance the expectations of London's visitors with the need to minimise inconvenience to other road users and pedestrians. As theatre show times (matinee egress and evening arrivals) generally coincide with evening peak, dedicated space in a suitable location would eliminate any potential for conflict.</p> <p>It is accepted that the previous location may not be in line with the revised traffic arrangements proposed, or which may be necessitated by proposals for other streets in the immediate vicinity, notably those for Oxford Street. However they urge that consideration is given to providing facilities which would compensate for the loss of those previously available.</p> <p>Options which could be considered are:</p>	

**APPENDIX (CONTINUED)**

NAME and ADDRESS	OBJECTIONS / COMMENTS / SUPPORT	OFFICERS' COMMENTS
	<ul style="list-style-type: none"> <li>• Reinstatement of the bays on Hanover Square, in lieu of a proportion of the paid for parking bays proposed.</li> <li>• Consideration of the relocation of the bays to an alternative location within Hanover Square.</li> <li>• Consideration of the relocation of the bays to an alternative location in adjoining streets.</li> <li>• Consideration of providing facilities in the surrounding locality, on Maddox Street for instance, which could be both chargeable and access time related.</li> <li>• Provision of “mixed use” status for the loading bays proposed under this scheme, permitting them to be used by coaches and goods vehicles. As the times of the day coach traffic would be present are unlikely to clash with the periods which goods deliveries will be at a peak, this could offer a solution which not only increases the provision for coaches, it would also maximise the use of the scarce kerbside space.</li> </ul> <p>They note the provision of two shared-use bays on Hanover Street and request clarity on the particular definition for use of these bays and they would highlight the opportunity for these to be made available for coach use.</p> <p>In general the issues raised mirror those highlighted by [REDACTED] in the recent consultation</p>	



**APPENDIX (CONTINUED)**

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