

TFL PROPOSALS FOR HOLLAND PARK AVENUE AND NOTTING HILL GATE

POSITION STATEMENT BY THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA

14 JUNE 2019

As a Council that wants to listen to and support our local residents and local businesses, we have sought to engage widely to hear what people think about TfL's proposals for Holland Park Avenue, Notting Hill Gate and surrounding streets, before setting out our position. We understand that some residents and some businesses are frustrated that we did not set out a clear position from the outset. For the avoidance of doubt, these are proposals designed by TfL, after a lengthy period of engagement with Council officers, and it is for the Council to decide whether it wishes to approve or reject them.

However, we think it was right that we should seek to hear as many voices as possible, in order to best represent our vibrant and dynamic local residents and local businesses in relation to these proposals. Now that the consultation period nears its end, we think it is right that people should know what the Council thinks.

Whilst the Council supports cleaner and more active modes of transport in our borough and across London - indeed, whilst the Council wants to promote healthier city living and to reduce air pollution - we cannot support TfL's proposals for Holland Park Avenue, Notting Hill Gate and surrounding streets.

In recent times, the Council has expanded Cycleway that provide local cycle routes for residents, workers and visitors to our borough. Even over the last few weeks, the Council has spent time consulting with residents on a proposed new Cycleway route, which would support cycling in the very area that TfL's proposals are pitched. We have begun to convert car parking to cycle parking, and we are just about to introduce a 20mph speed limit across two wards and a number of streets (including several of our first generation Quietways). We know that if we want more people to cycle in our borough, then we must be prepared to make changes to our roads.

But the Council's first priority must be to represent local residents and local businesses: and we have been struck by the strength of feeling and the volume of correspondence from people who oppose TfL's plans. It is true that the Council could have urged TfL not to consult on these proposals. We thought that would be wrong. We do not want to discourage TfL from engaging with our residents and businesses. We want to listen to our communities - and we think we have done just that, in particular at productive and well-attended TfL drop-in events at St George's Church. We are grateful, too, to the Kensington Society, who hosted a productive and well-attended meeting at our own Town Hall towards the end of the consultation period. In that meeting, we heard from many people, - including some cyclists - with deep concerns about TfL's plans.

The Leader of the Council has received more than 450 e-mails from residents in relation to TfL's proposals. Local councillors also engaged widely, responding to hundreds of e-mails from residents in relation to these proposals. What is abundantly clear - on the basis of this thorough engagement process - is that the vast majority of our residents, whom we are determined to serve and to represent, do not support these proposals. Our residents' and our businesses' concerns about the proposals are numerous; some highly-localised.

On a closer examination of the detail of these proposals, which we spent considerable time reflecting upon, three concerns stand out:

1. Concern about a tree deficit in one of the city's most picturesque areas, which also prompted a local petition;

The scheme requires the loss of the 23 trees in the central reservation on Notting Hill Gate. Since this is incompatible with TfL's Healthy Streets philosophy, which places great value on the benefits of trees, we share our residents' and businesses' concerns that even with every incentive to avoid this negative feature of proposals, TfL have not been able to produce a scheme that keeps our trees. We want to save our trees.

It has been suggested that we can have our cake and eat it - a new cycle lane, with no loss of trees - by removing loading bays and a bus stop, or a lane of traffic. But in avoiding one problem with the scheme, this would simply exacerbate others. For example, removing loading spaces for local businesses would run contrary to our aim of revitalising local high streets.

2. Concern about increased congestion on a busy arterial road and surrounding streets due to the removal of a traffic lane, and confirmed by TfL's own modelling;

TfL's traffic modelling, provided in the consultation material, acknowledges that westbound journey times in particular would increase as a result of the scheme, despite a number of modifications to junctions and traffic signal phasing to mitigate the reduction in capacity. We accept that the impact of removing one of two traffic lanes is more complicated than some assume, and we note the efforts that TfL has made to retain two lanes on the approaches to most junctions – unlike, for instance, the junction at Lancaster Gate, which very many residents have pointed to as an example of a cycle scheme that has reduced general traffic capacity, resulting in much slower journey times for bus and car users.

However, it is clear that for large numbers of our residents, any significant increase in congestion along this corridor is unacceptable. The published journey time impacts are necessarily expressed as ranges, so there are best case and worst case scenarios. But a four-to-five minute increase on a 20-30 minute journey could mean a 20 per cent increase (Routes 94 and 148 Westbound, morning peak). And on Route 31, the potential increases in journey time are over 40 per cent (Eastbound, evening peak).

For general traffic, the forecasts show several instances where journey times could increase by two-thirds, and some by more than that. While some of the eastbound journey times would be shorter, all of the westbound journey times shown in the three sections of road in our borough, for both morning and evening peaks, would be longer.

The Council and our residents note, too, that congestion is not only a transport issue, but also a health issue - tied up, as it is, with poor air quality. Those who live close to the proposed route are worried that slower-moving traffic and longer queues at junctions would mean poorer air quality - and on a road that already breaches the annual limit value for nitrogen dioxide. TfL has not published its assessment of the forecast air quality impacts of the scheme. In the absence of any information to the contrary, many residents have understandably drawn the conclusion that if the traffic modelling forecasts longer journey times, then their local air quality would be made worse rather than better if the scheme were implemented.

3. Concern about the impact of the proposals on public transport users

Many of our residents have been surprised that TfL, which is responsible for running bus services, should come up with a scheme that removes two westbound bus stops and leaves a gap of over 650 metres between the remaining stops. Surprised, and also very concerned, about the impact that this could have on their daily lives – particularly those for whom

walking any distance is a struggle. We know that TfL's own planning guidelines aim to keep the distance between bus stops to no more than 400 metres, and we believe that the engineers who designed this scheme simply could not find a way to save the bus stops without creating other problems. We accept that in a major redesign of a road, it is likely that there will need to be some difficult choices. Sometimes, it makes sense overall to move a bus stop, or even to remove it completely. But to leave only one westbound bus stop between the Hilton Hotel and Campden Hill Road, is asking bus passengers to accept a huge reduction in access to the bus network.

The Council does see some benefits to TfL's proposal. For someone wishing to cycle along Holland Park Avenue - and we want more of these - this may be a good set of proposals. We note specific concerns about the potential for collisions between cyclists on a bi-directional track on a gradient. But we accept that many people would feel safer using such a track than they would do in the main traffic lanes. Nor do we consider that the lane would necessarily be dominated by people cycling at great speed, to the detriment of very young or very old cyclists. The Council recognises that evidence from other protected cycle lanes suggests otherwise. So we expect that TfL will receive a substantial number of responses from people who support the cycle lane and that they would feel more comfortable riding on it than riding in traffic.

We are grateful to TfL for their constructive engagement on these bold proposals to support cycling across London. Indeed, the Council notes that TfL officers have suggested that some of the unwelcome features of their proposals are not intrinsic to the overall concept. It is possible that the designs could be reviewed in the light of our residents' and the Council's comments during the consultation period. For example, the proposal to ban the left turn from Royal Crescent into Holland Park Avenue is not fundamental to the viability of the wider scheme. It could be dropped. We would suggest that the locations of specific pedestrian crossings could be reviewed, too, as could some of the changes proposed to parking and the removal of the cycle hire docking station near Princedale Road.

Despite the Council's opposition to TfL's proposals in the round, we do wish to state there are several elements which we think are worthy of taking forward to detailed design. We have seen very little criticism of the proposal for a walking and cycling path across the middle of the Holland Park Roundabout, which would improve conditions dramatically at a location that currently provides a very hostile environment for pedestrians and cyclists alike. We think this part of the proposal should be progressed. Likewise, some of the new or improved pedestrian crossing facilities that have been proposed are in locations where we know there is local demand for such schemes – most notably across the western arm of Royal Crescent, and across Campden Hill Road. We will also consider what can be done to reduce collisions at locations such as the junction of Holland Park Avenue with Holland Park (east). We would like to continue to work with TfL on these and potentially other aspects of the scheme, subject to the outcome of the whole consultation.

We recognise that TfL have worked hard to prepare designs for consultation, and it is a matter of regret that this has not resulted in a scheme that (a) meets the strategic demand, and (b) commands local support. The Council will consider alternative options for cycle routes that have been put forward by residents and others, and we will continue to build on our network of Cycleways on quieter roads, which will be of particular value for local trips. However, we cannot support the TfL scheme that has been put to consultation and which has been so clearly rejected by our residents and our businesses.