

- The TA should assess student and staff numbers from recent years and apply a first principles approach to trip generation and modal split;
- The TA does not reflect the current use of No 24 Kensington Square as “the Les Chatons” nursery;
- The stated trip generation for the Site is based on an application for an Extra Care scheme at Dovehouse Street which in turn relied upon a TRICS assessment of a single site in Hounslow. This data was from a Saturday survey which does not reflect the true impact during weekday peak hours – particularly as there would be more full time equivalent staff than residents;
- It is not robust to compare weekday trip generation for the existing use with weekend trip generation for the proposed use;
- The TA has applied the same modal split to resident visitor and staff trips. However, these three groups are likely to have significantly different travel patterns and should therefore be assessed separately; and
- The TA methodology both over-estimates the trip generation of Heythrop College and does not properly assess the weekday trip generation of the proposed development. The increase in traffic could be therefore much more significant than contemplated and therefore the TA should include a much more detailed assessment of the impact on the surrounding highway network.

The TA (and the conclusions within it) are all predicated on the assertion that the proposed development will not increase traffic in comparison with the notionally identified baseline (as opposed to existing traffic levels).

As set out above TTHC has identified that the TA has overestimated the ‘existing’ trip generation and not properly assessed the likely ‘proposed’ trip generation. The overall conclusions within the TA are unreliable and do not currently form a robust evidence base for the purpose of considering whether the impact upon existing residential amenity, traffic congestion and highway safety is acceptable.

There is no record of how many cars actually used the site when the College was previously fully operational, but it is not the recollection of long term residents of South End that there was any significant traffic from the college. Nor was such traffic mentioned as being a constraint upon development when the Council granted planning permission for complete rebuilds in respect of 18 and 16 South End in 2004 and 2007 respectively.

The Demolition and Construction traffic plan proposes 10.2m lorries and 16.6m low loaders. There does not appear to have been any practical trial run to see if either of these vehicles can enter St Alban’s Grove turn right into South End Row, and left again into South End – all without demolishing the historic vent stench pipe. It is incumbent upon the application to demonstrate that such movements are possible (through a video demonstration and report) and that the proposed number of HGVs can enter and exit the site (as well as unload) in the prescribed daily hours.

While during the construction phase the applicant may be able to mitigate the traffic through the use of competent and efficient traffic marshals to a limited extent, such mitigation will not be in place once the development is operational.

The Servicing Plan explicitly acknowledges that the applicant is powerless to control the timing, frequency and mode of future deliveries for residents. The contemplated Booking System is wholly inadequate to address the traffic problems such deliveries will cause in tandem with the significant increase in other traffic entering and exiting the site. Nor has any consideration been given the conflict with the servicing and delivery requirements of existing residents as well as their own vehicular access.