

## RBK&C TRANSPORT COMMENTS

<b>PP No:</b> 17/00253	<b>Address:</b> 128A Lancaster Road, LONDON, W11 1QS	<b>Date of obs:</b> 24 February 2017
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**Proposal:** Demolition of existing youth centre building (Class D1 use) and construction of mixed-use four storey building comprising library, replacement youth centre, external multi-use-games-area (MUGA) and education space (Class D1 use), together with associated hard and soft landscaping. (MAJOR APPLICATION)

More info needed	No Objection	No objection STC	Concern Raised	Objection
		✓		
<b>Initial Observations</b>		<b>Transport Officer:</b>		<b>DM Officer:</b>
<b>Full Observations</b>	✓	<b>Kieran Mackay</b>		<b>Lara Peter</b>
<b>Further Observations (no. )</b>				

**Comments:** The application seeks consent to demolish the existing youth centre building and construct a mixed-use four storey building comprising a library, replacement youth centre, external MUGA and education space. The proposed floorspace of the development is as follows;

- Library – 829 sqm (uplift of 249sqm from 580 sqm)
- Youth Centre – 531 sqm (uplift of 186sqm from 345 sqm)
- External MUGA – 763 sqm (uplift of 394sqm from 369sqm)
- Educational Use for 300 students and 55 staff – 1600 sqm

The site is located on the northern side of Lancaster Road, opposite Notting Hill Prep School and the existing North Kensington Library, and to the west of Chepstow House School. The provision of a third educational space within the sensitive highway environment of Lancaster Road has the potential to unduly impact the operation of the highway. To demonstrate this would not be the case, the applicant has submitted the following;

- Transport Statement
- Framework School Travel Plan
- Framework Workplace Travel Plan
- Delivery and Servicing Plan
- Construction Traffic Management Plan

### Principle of Development

The proposed relocation and re-provision of the library, youth centre and MUGA and the building of a new educational space for 300 students and 55 staff are not objectionable in principle given the area's very good public transport accessibility, indicated by a PTAL rating of 5. The high level of public transport accessibility is due to the proximity of Ladbroke Grove Underground Station and several bus services along Ladbroke Grove. No conflict with CT1 (a).

### Car Parking

The proposal for the development to be car free is welcomed, in line with CT1 (e). The site currently benefits from a car park allowing for three cars and a minibus to be parked in front of the existing youth centre accessed via a crossover from Lancaster Road. The applicant is proposing the loss of the car park. As the site has a very good PTAL rating of 5 this is not considered to be objectionable and the reduction in car parking spaces is considered to be in line with policy CT1, encouraging better travel choices.

At pre-application the applicant was advised that detail on how the extant parking is used should be submitted to allow a full assessment of the loss of parking and whether or not any disabled parking took place off-street which would be required on-street as a result of the development. Such detail has not been included which is disappointing, however providing a car free development is in line with local policy CT1 (e) and would encourage staff to find more sustainable methods of travelling to work. No objection is raised. A planning condition stipulating that there shall be no parking of motor vehicles within the application site at any time should be added.

#### Disabled Parking

The design and access statement states that six disabled bays are available on Lancaster Road for use by visitors to the site, however only one of these is located close enough to be considered a feasible option for use by visitors of the site. Should the need for extra provision of disabled parking arise, this is something the Council could provide on street in due course.

#### Coaches

The School Travel Plan states that coach drop offs and pick-ups would take place on the single yellow line outside the site. Whilst drop-offs and pick-ups outside of the morning and afternoon peaks is considered acceptable, parking is not permitted on yellow lines during controlled hours and as such any strategy for coach parking should detail where coaches would park away from the site. It is expected that the proposed school would generate demand for coach use. To avoid conflict with servicing vehicles, details on the management of coaches should be included in the Delivery and Servicing Plan (DSP). The DSP should detail the number of coach trips expected to be generated by the site. The DSP should prohibit coaches being on the public highway to the front of the site during the school AM and PM peaks.

#### Bicycle Parking

Chapter 6 of the London Plan outlines the requirements for the minimum provision of cycle parking expected, which for D1 (education) requires 1 long stay space per 8 staff and 1 long stay space per 8 pupils and 1 short stay space per 100 pupils. For the D1 (other) uses such as the library and youth centre, and for the D2 (sports) use 1 long stay space per each 8 staff and 1 short stay space per each 100sqm are required. The standards are reflected in the Council's Transport and Streets SPD.

#### *Education Use*

The proposed educational use will cater for approximately 300 students aged 11-16 and 55 staff. The cycle parking requirement for the education use is 45 spaces. The plans and design and access statement detail the area allocated for educational cycle parking. The proposed cycle store would measure c.9m long and c.3m deep. The plans state that the cycle store would accommodate 44 cycle parking spaces. To fit such a quantity of cycle parking into the area the use of double stackers is required. The suitability of double stacker cycle parking for schoolchildren is questionable as many may be unable to lift their bicycle onto such stands. The space allocated to cycle parking is such that the tightest possible layout of the stands is required, which sets cycles c. 390mm apart from centre to centre. As proposed, the layout would likely lead to bicycles becoming tangled when trying to place or remove them from the stands. If parking a bicycle is an inconvenience the mode becomes less attractive vis-a-vis alternatives which may be less sustainable. Whilst it is disappointing, there does not seem to be any suitable alternative for the location of the school cycle parking and expanding the store would inhibit access to and from the building. Furthermore the school children will be of secondary age and as such may be able to use the double tier Josta stands.

The Transport and Streets SPD details the requirements expected for cycle parking, namely that it be secure, sheltered for the elements and easy and convenient to access and use. The proposed location for the school cycle parking meets the convenience requirement in that it is located close to the entrance of the school. The transport statement details that the school cycle store would be locked during the day and opened in the morning and afternoon to allow students to deposit/ collect their bicycles. No objection is raised to the proposals for cycle parking for the school. The retention of the cycle parking for the lifetime of the development should be secured by planning condition.

#### *Youth Centre/ Library/ MUGA*

The plans show a cycle store located on the western side of the building for use by staff of the youth centre/ library and MUGA. Whilst exact details on the number of staff for these facilities have not been given, the provision of four spaces would cover 32 staff under the London Plan standards. The framework travel plan indicates there would be at most 16 staff on site at any one time. The cycle parking would be secure and convenient and easy to access and use. The provision of shower facilities for staff is welcomed. No objection is raised to the cycle parking for the youth centre, library and MUGA.

#### *Visitor Cycle Parking*

The provision of visitor cycle parking required under the London Plan standards is 3 spaces for the educational use (1 space for every 100 pupils) and 1 space per each 100sqm of floorspace for the MUGA, Library and Youth Centre. In total 26 visitor cycle parking spaces should be provided. It is unclear how many Sheffield stands are proposed within the forecourt area. From the drawing it appears 8 visitor parking stands would be provided on the forecourt to the front of the building. The shortfall in visitor parking could be addressed with some parking located to the west of the building, providing this does not block the

access to the Notting Hill Prep building. Details on the visitor cycle parking should be secured pursuant to a planning condition.

### Refuse Storage

The plans show refuse storage for the educational use located at the north-east of the site, adjacent to the bicycle store. The refuse store for the library and youth centre is located at ground floor level on the west side of the building. The delivery and servicing plan details the arrangements for refuse collection, which involve the refuse being transferred by site management to a 'presentation zone' to the front of the building, within 10m of the carriageway, for collection by refuse operatives. Page 88 of the design and access statement shows the location for these presentation zones as being immediately adjacent to the public footway. The refuse storage and collection arrangements are considered acceptable, in line with CE3 (c) and CR7 (d).

### Servicing

The applicant has submitted a Delivery and Servicing Plan. The plan states that servicing would take place from the double yellow lines to the front of the site, in front of the existing crossover which is due to be removed. The plan states that where possible the servicing would not take place during the hours of 8am-9am and 3pm to 4pm. Servicing during these time would conflict with school drop off and pick-ups and would be considered contrary to CR7 (d) due to the adverse impacts on traffic congestion and pedestrian safety that would arise. The submission of a final Delivery and Servicing plan with a firm commitment to prohibit servicing during these hours should be secured pursuant to a planning condition prior to occupation of the building. The level of servicing expected from the development is not detailed in the delivery and servicing plan. Whilst it is not considered likely that the development would have a particularly large servicing requirement, for the avoidance of doubt this detail should be included in the final plan. The applicant should detail whether the servicing for each use would be managed independently or by a site manager.

### Highway Works

The proposals involve the removal of the crossover to the existing youth centre car park. The submitted documents are unclear on whether the applicant wishes to retain the double yellow line or replace it with single yellow line. Replacing the double yellow line with single yellow line would allow servicing to take place during the day and could be used by residents for parking overnight, and as such would be the preferred option. The Council may wish to adjust the parking arrangements to ensure the two pedestrian accesses either side of the main building do not become informal vehicular accesses over time. This would involve relocating two or three residents parking bays to the west to block any vehicular access to the public courtyard to the west of the building.

All works would be undertaken by the council at the expense of the applicant. Costs for the reinstatement of the footway and the relining of parking bays and single yellow line are estimated to be £3,500. A Grampian condition should be added ensuring the development is not occupied until such time as the works to

reinstate the footway are completed.

The applicant is proposing to demolish part of the wall to the front of the site to provide full access to the front of the building. The proposal to remove part of the Chepstow House boundary wall is welcomed as it would provide extra footway for those accessing the development.

The applicant is proposing brick paving for the forecourt area to the front of the building, with raised brick planters either side of the entrance and seating and visitor cycle stands to the east of the entrance. The private forecourt area would be well demarcated within a line of paving blocks abutting the boundary of the adopted highway. The proposed landscaping is considered to be acceptable as the proposed materials are of a high quality and the level of street furniture proposed would not clutter the streetscape, however more detail, including topographical and section drawings, is required to ensure the private maintained forecourt area does not drain on the public highway. Detail on the level of the forecourt area (spot heights) and the proposed drainage layout should be submitted pursuant to a planning condition to the Council for approval prior to implementation.

#### Impact on the Highway

The applicant has submitted a Transport Statement to demonstrate that the proposals would not unduly impact the operation of the highway. The transport statement estimates the likely trip generation as a result of the proposals in order to assess the likely effect on the public highway network and the public transport network.

The applicant details that for the Youth Centre, Library and MUGA the majority of demand served is likely to be local and therefore the majority of trips would be made on foot/bike or using public transport.

In the case of the MUGA and the Youth Centre, the trips are likely to be generated outside of peak hours, including on evenings and weekends. The Library, MUGA and Youth Centre represent a re-provision of existing facilities albeit with an uplift in floorspace. The MUGA would also be used by local schools during the day but this use does not represent an increase in trips to the site due to the proximity of the schools and the fact they will walk.

All the above considered, whilst the uplift in floorspace may bring about an increase in trips, such an increase would be modest and would not unduly impact the operation of the highway. It is accepted that the majority of trips would be serving a local demand and would fall outside of the AM, PM and afternoon school peak.

#### *School Trip Generation*

As was advised at pre application stage, to determine the likely trip rates by mode for staff and pupils of the proposed school, travel surveys from two secondary schools located nearby were taken. Travel surveys from school travel plans for Kensington Academy (500m walk from site) and Sion Manning

Secondary School (700m walk from site) were taken as comparators. These schools have similar PTAL ratings due to being in walking distance of Ladbrooke Grove tube stations and local bus stops. The travel surveys for pupils showed a low reliance on private cars to get to and from school, with non-car modes accounting for between 82% and 89% of travel.

For staff the modal share figures were taken from the Kensington Aldridge survey as the site is comparable in that it offers no parking. The results found that 14% of staff used a car to get to work, with the rest travelling by public transport, walking and cycling.

Applying the modal split percentages to the estimated number of pupils and staff gives an approximate trip generation for the proposed educational use. The results estimate there would be 50 car trips generated (by staff and pupils) in the morning peak and a similar number in the evening. I consider this to be a realistic and robust estimation of the likely trip generation. The addition of 50 vehicles during the morning and afternoon school run would materially impact on traffic conditions on Lancaster Road, during which problems have been reported to occur due to the presence of the two existing schools.

A visit to the site between 8am and 9am on 20 February 2017 confirmed that whilst the highway network is busy during the AM peak, the flow of traffic was well managed through the use of traffic marshals and members of staff moving traffic on and assisting with the drop-off of children. Whilst some double parking does occur, drop-offs and pick-ups appeared to be well managed on the whole.

Vehicles utilise the double yellow line in front of the youth centre and the two stretches of single/double yellow line on either side of Lancaster Road outside the Chepstow House School fire gates to make drop-offs. These areas are to be retained as a result of the proposals and it is considered likely that they would provide sufficient capacity to accommodate the additional trips generated by the development.

A parking survey undertaken by the applicant on 4 July 2016 between 7:45am and 9:15am found occupancy to be very high in the parking bays on Lancaster Road within 100m of the site, with bays full for the majority of the morning peak. The Council's latest full parking occupancy data (MHTC 2011) shows there to be capacity for vehicles with residents permit to park within 200m of the site. Weekday afternoon and overnight occupancy in residents' bays within 200m of the site was at 59 and 71 per cent capacity respectively. Such capacity provides the opportunity for parents to park their cars within walking distance of the site and walk their children the final 200m (park and stride).

The school travel plan details measures to manage vehicle movements during drop-off and pick up times and measures which seek to progressively reduce the modal share of private vehicles for travelling to school. The transport statement details that a member of staff will be present on street to ensure that double parking does not occur and to assist with drop-offs and pick-ups, as is the case with the two existing schools. The transport statement also details the intention to establish a cross-schools steering group to discuss travel plans and any problems that may be occurring.

The transport statement concludes that under the NPPF developments should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. Local Policy CT1 (b) requires that applicants demonstrate that development proposals would not result in any material increase in traffic congestion or on-street parking pressure. Whilst the proposals would result in a material increase in traffic and parking demand during the morning and afternoon school peaks, these impacts, if appropriately mitigated through adherence to a good quality travel plan and coordination with the other schools on Lancaster Road, should not be significant. If the measures outlined in the travel plan are enforced by the school and respected by parents this should ensure that drop offs and pick-ups occur without any undue impacts on the highway. No conflict with CT1 (b).

### School Travel Plan

The applicant has submitted a framework School Travel Plan for the site. The school travel plan was reviewed by a member of our sustainable travel team. The plan is acceptable for the most part; however there are a number of modifications that should be made prior to the final submission of the document. They are as follows;

#### *Targets (Page 11)*

- Pupils - The target to reduce travel by car should be greater than the target to reduce travel by bus.
- Staff - The increase in walking target may be unrealistic as this depends on where staff members live. A more realistic target could look at tube or bus travel.

#### *Travel Plan Co-ordinator (Page 12)*

- The travel plan coordinator should use the STARS online accreditation system to report the results of the travel plan to TfL. Recording activities and updating the travel plan should be done using STARS.

#### *Walking to School Initiatives (Page 16)*

- The council do not do the big street survey. We would recommend TfL's Youth Travel Ambassador Scheme.
- The children will be secondary school age and will have received pedestrian skills training at primary school.

#### *School Cycle Training (Page 18)*

- The wording should be changed to 'if the school would like cycle training to be embedded into the curriculum, they can enquire about staff instructor training options with the Council's Sustainable Transport Team.'

#### *Page 21*

- The school should avoid parking coaches on the highway wherever possible. As with servicing, all coach movements should be restricted outside of drop off and pick up times at the start and end of the school

day.

- The Travel Plan Co-ordinator should contact the Council's Sustainable Transport Team prior to publishing the welcome pack for information on free cycle training, free bike maintenance sessions and the free eBike loan scheme.

The school travel plan should also include the following mitigation measures and initiatives detailed in the transport statements;

- Details on traffic management measures including the provision of a traffic marshal/ member of staff on street during the AM and PM school peak to assist with drop-offs and pick-ups and to ensure double parking does not occur.
- The formation of a cross-school steering group to facilitate coordination between schools, discuss travel plans and initiatives and resolve any problems.
- Encouraging children and assisting them in the acquisition of Zip Oyster Cards.

#### Framework Travel Plan

As an educational centre, the library presents a good opportunity to educate staff and visitors on the benefits of sustainable travel. The aims and measures outlined in the travel plan are considered to be acceptable.

The travel plan should include targets to reduce both staff and visitor travel by car, ahead of encouraging a reduction in public transport use.

The submission of a final Workplace Travel Plan for the Library and Youth Centre uses should be secured pursuant to a planning condition.

#### Highway Safety

I have reviewed the highway safety records of the stretch of Lancaster Road between the Ladbrooke Grove and Portobello Road junctions for the 3 years to August 2016. A review of the collision data indicates that the highway layout in the vicinity of the site has not been attributed as a factor in causing collisions.

#### Construction

The demolition of the existing building and proposed rebuild would result in a significant amount of construction traffic in the vicinity of two schools. To demonstrate that the construction works would not have any unacceptable impact upon the highway or the site's neighbours the applicant has submitted a draft CTMP to support their application. The CTMP does not demonstrate compliance with CT1 (b) and CL7 (k) and prior to the submission of a final CTMP, the following amendments should be made;

Q8 – The answer states that during demolition and excavation phases the route to and from the site will be from the west, but then that the lorries will exit to the east. This must be clarified.

The applicant should include swept path to justify their decision to carry on along Lancaster Road and down St Luke's Road instead of using Basing Street. The preference is for vehicles to route onto the classified highway network as early as possible and parts of Lancaster Road to the east of the junction with Basing Street appear to be as narrow as Basing Street.

The need for such a large concrete pump is not justified. The closure and diversion of the footway in the vicinity of two schools is unacceptable and the number of parking bays requiring suspension when using such a large pump is unacceptably high. The concrete delivery methodology should be amended to use a smaller pump that does not require the footway to close.

The proposed temporary pit lane should be no wider than 3m, thus maintaining 3m clear carriageway without the need for suspension of parking bays opposite. The maintenance of 3m clear carriageway would not be sufficient during the morning and afternoon school peaks and would lead to an unacceptable impact on congestion in the area. The pit lane should be demounted outside of construction hours to provide sufficient clear carriageway to avoid unduly impacting the operation of the highway during the school peak times.

Q19 – Vehicle dimensions and dwell times should be included.

Q25 – This answer states that materials will be stored in the pit lane as is shown elsewhere in the document. I cannot find where the document references this. The pit lane has been designed to allow vehicles to enter and exit in a forward gear. Storing materials in the pit lane would prevent this. The storage of materials on the highway is totally unacceptable given that there is ample opportunity to store material on site.

In its current form the CTMP does not demonstrate compliance with CT1 (b) and CL7 (k). Due to the proposed closing the footway in between two schools and suspension of an unnecessarily high number of parking bays, the works would be considered to cause unacceptable harm to pedestrian safety and place an unreasonable inconvenience on those living working and visiting the nearby area.

**Relevant policies:** CT1 (a), (b), (e), (f), (g) CE3 (c), CR4, CR7 (d), the Transport and Streets SPD, the London Plan Chapter 6 and the NPPF paragraph 32

**Recommendation:** No objection is raised, subject to the following **planning conditions**;

- A final school travel plan, amended as per the School Travel Plan Officer's suggestions, submitted for approval prior to occupation of the school.
- A final workplace travel plan, amended as per the above comments, submitted for approval prior to the occupation of the library and youth centre.

- A Delivery and Servicing Plan, amended as per the above comments, submitted prior to the occupation of the building.
- Details on the school cycle parking suitable for use by children and the quantity of visitor cycle parking.
- A final CTMP amended as per the above comments.
- A Grampian condition requiring the reinstatement of the footway in place of the existing crossover and the associated works relining the highway and moving the residents' parking bays, prior to the building becoming operational to satisfy CT1 (g).
- Details on the levels and drainage of the proposed forecourt area, to ensure there is no drainage from private land to public highway.

**Signed:** Kieran Mackay