

**PROPOSED REDEVELOPMENT OF  
HEYTHROP COLLEGE, KENSINGTON**

**TRANSPORT REVIEW (OBJECTION)**

**(Zipporah Lisle-Mainwaring)**

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## CONTENTS

		<u>Page No</u>
1.0	INTRODUCTION AND BACKGROUND	1
2.0	SOUTH END SITE ACCESS	4
3.0	EXISTING AND PROPOSED LAND USES	8
4.0	CONSTRUCTION IMPACTS	10
5.0	TRIP GENERATION AND OPERATIONAL IMPACTS	15
6.0	POLICY/GUIDANCE CONFLICT AND ADDITIONAL MATTERS	19
7.0	SUMMARY AND CONCLUSIONS	22

## TABLES

Table 1	Existing and Proposed Floorspaces
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## FIGURES

Figure 1	SPD Boundary and Application Boundary
Figure 2	South End – Existing Layout and Features

## APPENDICES

Appendix A	Site Photographs
Appendix B	Quietway Cycling Route

## 1.0 INTRODUCTION AND BACKGROUND

- 1.1 This Transport Review has been prepared by TTHC Ltd on behalf of Zipporah Lisle-Mainwaring (the owner of 19 South End) in relation to the proposed redevelopment of the Heythrop College site in Kensington (the Site), which has planning application reference (PP/18/05313).
- 1.2 The Site currently comprises buildings relating to residential and non-residential education uses.
- 1.3 The Royal Borough of Kensington and Chelsea (RBKC) adopted a Supplementary Planning Document (Site SPD) for the Site in May 2016. This Site SPD notes that in recent years student numbers have been falling and that the college is due to close in December 2018.
- 1.4 In conjunction with the redevelopment of the Site, one of the key objectives identified within the Site SPD is that the development '*preserves the tranquil and picturesque nature of the Site*'. In this regard it is noted that one of the identified strengths is that the Site lies within '*a quiet enclave which is unusual in central London*'.
- 1.5 However, one of the weaknesses identified within the Site SPD is that '*access to the Site is extremely limited*' and that '*there is one vehicle access point via South End, which is not wide enough to accommodate a significant increase in traffic or large lorries.*' The Site SPD recognises that whilst the grounds '*happily accommodates a college campus with a relatively small number of students who generally use public transport, the Site may be unsuitable for more intensive use.*'
- 1.6 Given these identified weaknesses, the Site SPD highlights that redevelopment of the Site poses threats, the first being; '*Certain uses, particularly ones that*

*increase traffic in the area, could have a harmful impact on the amenity of local residents, especially in Kensington Square, South End, and South End Row.'*

1.7 As already noted, South End provides the only vehicular access to the Site at present. In respect of access, the Site SPD highlights that; '*The Site is isolated with vehicle access only from South End and this access is narrow and close to residential properties.'*

1.8 Against the backdrop of these constraints, the Site SPD identifies areas within an Indicative Site Layout (based on the current College boundary) which retains vehicular access from South End, with restored/refurbished buildings in the northern portion of the Site, communal open space in the central area and redevelopment of the southern section.

1.9 The proposals for the Site constitute a major development and comprises:

*Reinstatement of three townhouses (Class C3), (part of 23 and 24 Kensington Square); refurbishment of college building (part of 23 Kensington Square) and use as an extra care facility (Class C2). Demolition of all other buildings on site. Erection of deck over adjacent London Underground line and construction of 5 buildings (ranging between 1 and 8 storeys in height) for use as an extra care facility including units, communal facilities and services areas, community hall and on-site affordable housing and associated access parking, servicing and landscaping.*

1.10 In contrast with the Site SPD, and as shown in **Figure 1**, the proposed redevelopment of the Site extends beyond the Heythrop College boundary to include additional development land which would be created via a proposed new deck over the Circle & District lines to the south of Kensington High Street Underground Station.

- 1.11 Despite this departure from the SPD, all vehicular access is proposed to remain via South End, and; despite extending the developable area, no alternative access arrangements have been promoted. The additional development land increases the overall site area by a further 21% over and above that which was covered within the SPD.
- 1.12 The current application is supported by a Transport Assessment (TA) prepared by Arup, which includes a Service Management Plan (SMP) within an Appendix. In addition, a Construction Environmental Management Plan (CEMP) and separate Demolition & Deck Overbuild and Construction Traffic Management Plans (DOBTMP and CTMP) have all been prepared by AIA Consulting.
- 1.13 In addition to the TA, these additional documents provide some further information relating to construction activity from which impact can be judged.
- 1.14 In its current form, the proposed development would be unsuitable in respect of transport and highways matters, both during its construction and its operation, for the reasons set out below.

## 2.0 SOUTH END SITE ACCESS

- 2.1 The TA does not include any detailed plan of South End in respect of its constrained layout, poor footway provision and other limiting features. **Figure 2** therefore provides a plot showing the constrained nature of South End as highlighted within the SPD as *'narrow and close to residential properties and not wide enough to accommodate a significant increase in traffic or large lorries.'*
- 2.2 A selection of Site Photographs is also presented in **Appendix A**. These show the layout and characteristics of South End and include photographs which demonstrate the constrained nature of this residential street.
- 2.3 As shown, South End is a narrow cul-de-sac with some parts measuring only 4.0m in width on site<sup>1</sup>, having regard to the resident permit on-street parking bays. For context, it should be noted that for two way HGV movement (standard vehicle sizes, not larger construction traffic) require a carriageway width of at least 5.5m of straight unrestricted carriageway in order to pass. The proposed access route is largely constrained to single passage of such vehicles.
- 2.4 In section 5.2.2, the TA makes reference to the majority of operational servicing by 6m transits with the remainder being 8m vehicles. This is clearly inaccurate as there will be other larger vehicles associated with activities such as regular refuse collection.

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<sup>1</sup> **Note: all dimensions quoted are measured on Site and not as measured on OS mapping – see also notes in Figure 2.**

**PROPOSED REDEVELOPMENT  
HEYTHOP COLLEGE, KENSINGTON  
TRANSPORT REVIEW (OBJECTION)**

- 2.5 Footway provision on South End is poor, with only short narrow (0.9m to 1.6m) sections available to the frontages of properties 7 to 9 and number 20. Some properties have no footway provision and so have garages and front doors with direct frontage access into the carriageway.
- 2.6 South End is cobbled and has Mews characteristics, in common with other streets within the Kensington Square conservation area. For much of its length it functions as a shared surface cul-de-sac.
- 2.7 There are issues relating to vehicle inter-visibility between other vehicles and pedestrians, owing to the alignment of South End and the direct frontage access which some garages and properties have onto the carriageway, as shown in the photographs.
- 2.8 Within paragraph 3.2 under the sub-heading of 'Pedestrians' the application TA states that the existing pedestrian access via South End is poor as it is closed off by a large set of gates [which serve the college]. There is no recognition of the constraints which exist nor the lack of footway provision, even based on existing levels of pedestrian and vehicular activity.
- 2.9 The only reference to South End being a narrow residential street is given under the heading of Highway Network (paragraph 3.5) although this again provides no detail.
- 2.10 The current extent of adoption continues as far as the access gates of Heythrop College, which limits activity to just that associated with the college and the 9 residential properties. However, the TA states that the extent of adoption will be extended into the application Site and that, unlike at present, there will be 24 hour public access through to South End. This would increase the potential for vehicle/pedestrian conflict.

2.11 RBKC's Transport & Streetscape Policies document notes that:

*'The Council understands that all road users are pedestrians at times, and that one of the main barriers to encouraging people to walk more often is an environment that is perceived to be threatening and dominated by motorised road users. The street environment can be particularly daunting, especially for older people, those whose mobility is impaired, such as wheelchair users, those for whom walking is either permanently or temporarily restricted, people with young children, including those with pushchairs or buggies, those who are visually or hearing impaired and people with learning difficulties.'*

2.12 The vehicular activity associated with South End has been limited for a number of years. Although the September 2017 TA Scoping Report refers to baseline traffic surveys having been commissioned 'to help inform the baseline situation' and Appendix C of the TA provides a Transport Survey Specification which includes counts of South End, none of this data has been provided within the TA. Indeed, the TA takes a contrary position to the Scoping Report stating that '...the data has not been used to inform the baseline trip generation because the existing site was largely vacant when the traffic survey was carried out.'. (TTHC emphasis added to extracts)

2.13 Of course, the status of the college activity would have been known at the time the survey was commissioned and so Arup must have thought this data was still necessary. In any event, the counted traffic data should still be provided for context as this provides the level of activity which locals residents have experienced and are familiar with.

2.14 The observed traffic activity would also provide the context for the most recent safety record for this location.

PROPOSED REDEVELOPMENT  
HEYTHOP COLLEGE, KENSINGTON  
TRANSPORT REVIEW (OBJECTION)

- 2.15 As specifically identified within the Site SPD, South End is not a road which is suitable for any material increase in traffic of any kind. It is a residential cul-de-sac which has also served the Heythrop College activity. However, even in this regard, the Site SPD recognises that whilst the grounds *'happily accommodates a college campus with a relatively small number of students who generally use public transport, the Site may be unsuitable for more intensive use.'*
- 2.16 The direct frontage access characteristics of South End are such that it is entirely unsuitable to mix residents and other pedestrian activity with any increased level of service activity in particular. Aside from the obvious amenity impacts, such increases would pose an increased danger for pedestrians who currently have limited protection in terms of footway provision and carriageway width. Such considerations have been clearly set out within the Site SPD.
- 2.17 Although South End has had a historic use in serving the college site, in terms of a service access it is sub-standard and hence it is unacceptable to encourage an increase in service activity. No doubt such characteristics were borne in mind when RBKC adopted the Site SPD: *'Certain uses, particularly ones that increase traffic in the area, could have a harmful impact on the amenity of local residents, especially in Kensington Square, South End, and South End Row.'*
- 2.18 Given the complete reliance of the application on South End and its recognised constraints as providing both the only construction and vehicular site access, it is surprising that an independent Road Safety Audit has not been provided.
- 2.19 The nature and characteristics of South End are such that any increase in traffic associated with the proposals will give rise to unnecessary increased risks and highway safety issues as well as impacts in respect of residential amenity.

### 3.0 EXISTING AND PROPOSED LAND USES

3.1 The existing buildings within the Site relate to residential and non-residential education uses. These are recognised within the Site SPD as generating only low levels of vehicle movements.

3.2 The application relates to an Extra Care development of 142 units, three residential townhouses, five on-site affordable housing, and a community hall. There would be 179 full-time equivalent employees.

3.3 **Table 1** compares the floorspace of the existing site and the proposed development. This data is presented in Tables 6 and 7 in the Arup TA.

<b>Table 1 Existing and Proposed Floorspaces</b>			
<b>Use</b>	<b>(Units)</b>	<b>Existing (sqm)</b>	<b>Proposed (sqm)</b>
Education		6,551	
Student accommodation		2,632	
Social / community		384	157
Nursery		380	
Extra Care units	142 units:		26,898
1 bedroom	68 units		
2 bedrooms	74 units		
Affordable units	5 units:		676
1 bedroom	2 units		
2 bedrooms	2 units		
3 bedrooms	1 unit		
Townhouse x 3			2,041
<b>Total</b>		<b>9,947</b>	<b>29,772</b>
<b>Net increase (sqm)</b>			<b>+19,825</b>

3.4 As shown above, the total development floorspace would triple in size as a consequence of the proposals.

- 3.5 As noted, the SPD acknowledges that access is extremely limited and that although the Site happily accommodates a college campus, with a relatively small number of students who generally use public transport, it may be unsuitable for more intensive use. There is one vehicle access point via South End, which is not wide enough to accommodate a significant increase in traffic or large lorries.
- 3.6 With regard to service vehicles, the SMP suggests that there would be an average of 29 daily deliveries, i.e. 58 two-way vehicle movements. This excludes general waste collection and clinical waste collection movements, so the true total would be higher. This would represent a significant and ongoing increase in large vehicle movements using South End.
- 3.7 Although the SMP states that delivery times will be booked in advance, inevitably sometimes multiple vehicles will arrive at the site in close proximity, which increases the risk of vehicles meeting on South End or on other constrained sections of the access routes.

#### 4.0 CONSTRUCTION IMPACTS

- 4.1 RBKC's T&S SPD requires CTMPs for major planning applications, which should provide sufficient detail to demonstrate that the construction traffic and activity associated with the proposed development works would not cause unacceptable harm to pedestrian, cycle, vehicular and road safety, adversely affect bus or other transport operations (e.g. cycle hire), significantly increase traffic congestion, nor place unreasonable inconvenience on the day to day life of those living, working and visiting nearby.
- 4.2 The SPD also notes under this section that; *'Applicants must detail how neighbours have been involved in generating the traffic management proposals contained within a CTMP. Applicants will be expected to have liaised with neighbouring residents and the Residents' Association for the street (if there is one) in advance of the application being made to ensure neighbours' views and concerns are taken into account. The application submission should identify those persons that have inputted to the development of the plan. Local people understand the local context and can provide constructive and valuable advice on how best to carry out a development given the context.'*
- 4.3 In this regard it is noted that the objection from Victoria Road Area Resident's Association (VRARA) dated 16 October 2018 states that the CEMP is unacceptable.
- 4.4 The CEMP suggests that construction vehicles would route from the A315 Kensington Road via Victoria Road, St Albans Grove and South End to the existing access gate into the Site. The overall length of the proposed access route from Kensington Road into the Site is 0.57km.
- 4.5 These streets are predominantly residential in character; during the daytime period there are more pedestrian and cycle movements than vehicle movements. Consequently, the geometry along this route is fairly restrictive:

the typical carriageway width on St Albans Grove is around 6.0m (including on-street parking), and the kerb radii at junctions are as small as 2m.

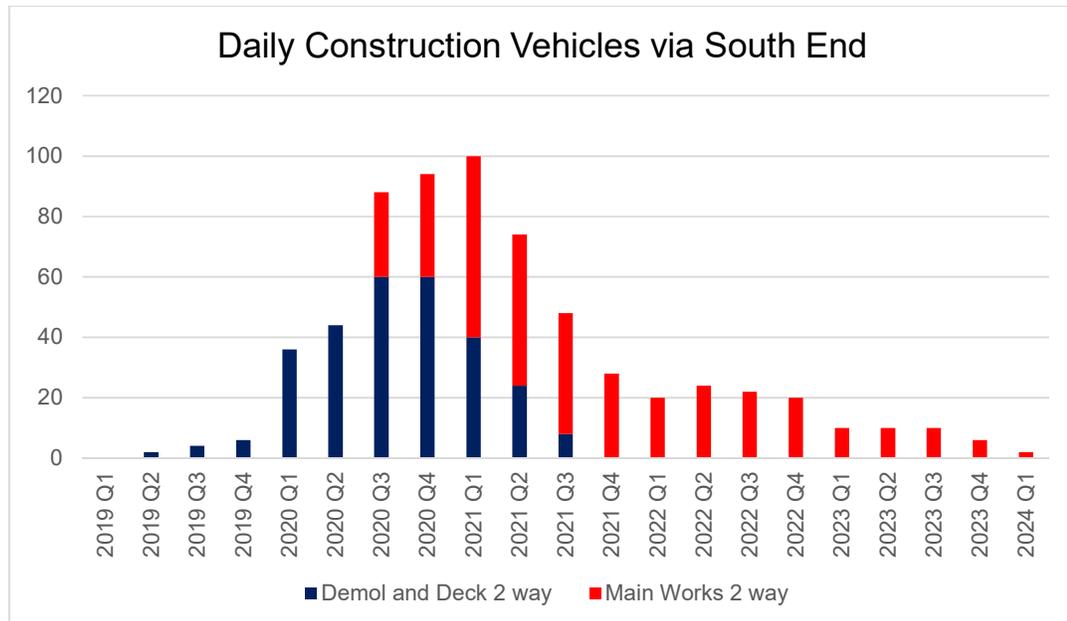
- 4.6 The sections of Victoria Road and St Albans Grove on this proposed route have significant lengths of on-street parking. There are also five parking spaces on South End close to the Site access gate.
- 4.7 The TA (Table 5) shows that on a typical weekday during the proposed hours of construction, typically 70-75% of the spaces on Victoria Road, 90% of the spaces on St Albans Grove, and all of the spaces on South End would be occupied. This would reduce the available space for large construction and service vehicles to manoeuvre.
- 4.8 This route overlaps on St Albans Grove with a 'Quietway' cycle route as designated by TfL and RBKC, as shown in **Appendix B**. The use of this route for large construction vehicles will therefore reduce the safety of cyclists using this route.
- 4.9 The CEMP (Appendix C) includes swept paths for construction vehicles using this route. The swept paths show that some of the on-street parking bays would need to be suspended, with some vehicles requiring all South End parking bays to be suspended. Some of the tracking shows construction vehicles over-running kerbs/footways and the need to remove street furniture. The plots are based on OS mapping only which (as already noted in the case of South End) may not reflect precisely the geometry of the highway routes.
- 4.10 With regard to construction traffic volumes, it is noted that separate Traffic Management Plans have been prepared for the 'Demolition and Deck Overbuild' and 'Construction' phases. Each of these documents provide the Applicant's estimate of the service vehicle volumes (which will be

**PROPOSED REDEVELOPMENT  
HEYTHOP COLLEGE, KENSINGTON  
TRANSPORT REVIEW (OBJECTION)**

predominantly HGVs) which are presented as one-way movements and summarised in charts.

4.11 The DOBTMP chart<sup>2</sup> commences at 2019 Q2 and runs through to 2021 Q3, whereas the CTMP chart<sup>3</sup> commences at 2020 Q3 and continues through to 2024 Q1, and so there is an overlap of these activities. Although the documents have separated out the activities '*for clarity*', there is no chart which shows the combined effect of the activities and in the form of two way vehicle flows.

4.12 The chart below shows the combination of both the DOBTMP and CTMP estimates on the basis of two way vehicle movements:



<sup>2</sup> Demolition Traffic Management Plan – Appendix C

<sup>3</sup> Construction Traffic Management Plan – Appendix C

- 4.13 As shown, during the 5 year development construction, there is a period of overlap between activities of five Quarters which provide a combined daily total (based on the Applicant's estimates) of up to 100 construction vehicle movements (two way) each day. Of course, these are **average** figures and so there will be inevitable peaks and troughs which would mean higher levels of activity on some days.
- 4.14 The overall length of the proposed access route from Kensington Road via Victoria Road, St Albans Grove and South End to the access gate is around 0.57km. Owing to on-street parking and restricted widths, for approximately half of this distance there is no space for vehicles to pass each other.
- 4.15 Even on the basis of the Applicant's estimates of **average** daily peak activity, there would be 100 HGV movements per day. During school term time, this equates to an **average** of just over 18 HGVs per hour or a vehicle movement over the 0.57km access route every 3 minutes 18 seconds.
- 4.16 Having regard to the transit time of the access route, including manoeuvres through associated junctions, other highway constraints and background pedestrian/cycle/traffic volumes, it is estimated that it would take on average around 4-5 minutes to travel the route, meaning that there will inevitably be vehicle conflicts on sections only wide enough for one vehicle at a time. It would therefore not be possible to 'control' the impact of HGVs on the surrounding highway network.
- 4.17 Of course, this assessment is based solely on the Applicant's estimates of its Site construction traffic and does not include any other existing traffic using the access route.
- 4.18 In any event, even on the basis of the Applicant's figures, the implications for residents of South End (and other parts of the Access Route) would be unacceptable.

- 4.19 The Applicant's proposed construction period is 5 years, which in itself is significant. In addition, based on the Applicant's traffic estimates, there would be 3 out of the 5 years when construction traffic volumes would be between 20 and 100 movements every weekday.
- 4.20 The traffic associated with the deck and demolition activities are estimated by the applicant to be particularly high and this in part at least can be attributed to the proposals departing from the extents of the SPD by way of inclusion of the creation of additional development land over the rail lines.

## 5.0 TRIP GENERATION AND OPERATIONAL IMPACT

### Existing Use and Conditions

- 5.1 The TA states that “a traffic survey of surrounding streets was commissioned in 2017”, but this traffic data has not been provided. The reason given for this is that the Heythrop College site was largely vacant, so the data would not capture the trip generation of the operational site. As noted earlier, this would have been known to Arups at the time but they commissioned the survey work in any event.
- 5.2 This data should be provided as it presents the context against which the proposals can be assessed, including what traffic volumes relate to the current safety record for this location.
- 5.3 Furthermore, the observed survey data would also capture general traffic associated with other land uses in the vicinity of the Site, including residential trips, and so this data should be made available.
- 5.4 In any event, if the applicant’s argument is that educational use of the Site such as that which exists at present is no longer viable, then the generated Baseline (rather than the observed) would appear to be erroneous. If the promoted baseline were achievable, then surely the viability argument would not exist.
- 5.5 The TA includes an analysis of vehicle trip generation for the consented College use and the proposed development.
- 5.6 Official data<sup>4</sup> shows that the total number of students enrolled at Heythrop College was as follows:
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<sup>4</sup> Higher Education Statistics Agency - ref SFR210, SFR224 and SFR242

PROPOSED REDEVELOPMENT  
HEYTHOP COLLEGE, KENSINGTON  
TRANSPORT REVIEW (OBJECTION)

- 2013-14: 800 students
- 2014-15: 700 students
- 2015-16: 560 students

5.7 The Site includes a hall of residence which accommodated 109 students – a significant proportion of the above numbers of enrolled students.

5.8 The TA states that RBKC recommended treating the entire site as student accommodation for trip generation purposes. The following student accommodation sites from the TRICS database have been used, based on weekday surveys:

- *Exeter – Point Exe*, 15-minute walk or free shuttle bus to University of Exeter campuses;
- *Islington – Canto Court*, third-party accommodation serving multiple universities;
- *Tower Hamlets – Quantum Court*, third-party accommodation serving multiple universities;
- *Coventry – Raglan House*, third-party accommodation serving multiple universities, also has 22 parking spaces.

5.9 Each of the above student accommodation sites is separate from a university campus and so students would travel between the accommodation and their university, whereas the Heythrop College site includes on-site accommodation (and so these trips would be internalised). The adopted methodology would therefore over-state the level of person and vehicle trips associated with the existing use.

PROPOSED REDEVELOPMENT  
HEYTHOP COLLEGE, KENSINGTON  
TRANSPORT REVIEW (OBJECTION)

- 5.10 The calculation of trips for Heythrop College from the TRICS data is not clear, but appears to relate to the campus site area. This is not an appropriate method as university campuses vary widely in density and composition.
- 5.11 It would be more appropriate to assess the student and staff numbers from recent years (as shown above), and if necessary apply a first principles approach to trip generation and modal split based on observed traffic volumes.
- 5.12 The TA does not reflect the current use of No 24 Kensington Square as the “Les Chatons” nursery.

**Proposed Use**

- 5.13 The trip generation for the Site is based on a recent application for an Extra Care scheme at Dovehouse Street in RBKC (ref PP/17/00583), which in turn uses a TRICS assessment of a single site in Hounslow.
- 5.14 The TRICS data for the Hounslow site uses a Saturday survey, which is the busiest day of the week for daily trips. However, this will not reflect the true impact during weekday peak hours – particularly as there would be more fulltime-equivalent staff than residents.
- 5.15 It is also not robust to compare weekday trip generation for the existing use with weekend trip generation for the proposed use.
- 5.16 The modal split is based on a recent application for an Extra Care scheme at 60 St John’s Wood Road in the City of Westminster (ref 15/09769/FULL).

- 5.17 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.
- 5.18 The TA concludes that “*there is forecast to be a minor increase in daily total vehicle trips*”. However, as shown above, 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 could in fact be much more significant and so the TA should include a more detailed assessment of the impact on the surrounding highway network.
- 5.19 South End not only provides the single vehicular access to the proposed development, it also serves as the only emergency vehicle access into the Site. Given the constrained nature of access and the type of residential development proposed (which may include a greater proportion of residents with mobility issues), the use of South End as both the only vehicle access and the emergency vehicle access poses an increased unnecessary risk.

## 6.0 POLICY/GUIDANCE CONFLICT AND ADDITIONAL MATTERS

6.1 The proposals will result in conflict with the following policies and guidance.

### **RBKC – Local Plan Policies**

6.2 Part (c) of Local Plan Policy CT1 requires it to be demonstrated that development will not result in any material increase in traffic congestion, whilst Part (h) requires new development to incorporate measures to improve road safety whilst resisting development that compromises safety.

6.3 In respect of Policy CR7 servicing needs to be well designed and should not give rise to traffic congestion, conflict with pedestrians or be detrimental to residential amenity.

### **RBKC – Transport & Streets SPD**

6.4 While the T&S SPD does not include detailed highway geometric requirements, reference is made in section 7.3.7 to the Department for Transport's Manual for Streets (MfS) and the importance of a street layout being appropriate for the relative importance of a street's 'place' and 'movement' functions.

6.5 In reference to 'new streets', the SPD goes on to state that:

*The primary function of most new streets in the borough will be residential and therefore that will have a predominantly 'place' function.*

6.6 Although the context of this comment is in relation to new streets, it is nevertheless important to appreciate and protect the place function of South End which would be lost in the event that general vehicle activity and service traffic were to increase.

6.7 The T&S SPD includes this Key Principle:

*Accesses should serve to increase permeability into development without compromising the visual or functional quality of the streetscape, highway safety, traffic flow or on-street parking availability.*

6.8 And under “Measures to reduce the impact of construction”

*We will only agree to construction arrangements where a minimum of 3m of clear roadway width can be maintained during deliveries. This is to ensure that the road does not become blocked. If necessary, parking bays must be suspended to achieve this.*

#### **RBKC – Road Safety Strategy**

6.9 The Road Safety Strategy makes reference to the potential hazards associated with deliveries, which again calls into question the suitability of South End as a servicing route for the Site:

*Loading and deliveries can have a major impact on congestion and on the safety of vulnerable road users. For those reasons, many Danish transport authorities banned deliveries to their key city centres during the working day. We will work with businesses to discourage deliveries during peak commuter hours.*

#### **Manual for Streets**

6.10 In respect of the place function, Manual for Streets states:

*The public realm should be designed to encourage the activities intended to take place within it. Streets should be designed to*

*accommodate a range of users, create visual interest and amenity, and encourage social interaction. The place function of streets may equal or outweigh the movement function.*

*Meeting the needs of drivers in residential streets should not be to the detriment of pedestrians, cyclists and public transport users.*

*The design of local roads should accommodate service vehicles without allowing their requirements to dominate the layout.*

## 7.0 SUMMARY AND CONCLUSIONS

- 7.1 This Transport Review has been prepared by TTHC Ltd on behalf of Zipporah Lisle-Mainwaring in relation to the proposed redevelopment of the Heythrop College site in Kensington (the Site).
- 7.2 The Site currently comprises buildings relating to residential and non-residential education uses.
- 7.3 The Royal Borough of Kensington and Chelsea adopted a Supplementary Planning Document for the Site in May 2016.
- 7.4 In conjunction with the redevelopment of the Site, one of the key objectives identified within the Site SPD is that the development '*preserves the tranquil and picturesque nature of the Site*'. In this regard it is noted that one of the identified strengths is that the Site lies within '*a quiet enclave which is unusual in central London*'.
- 7.5 However, one of the weaknesses identified within the Site SPD is that '*access to the Site is extremely limited*' and that '*there is one vehicle access point via South End, which is not wide enough to accommodate a significant increase in traffic or large lorries.*' The Site SPD recognises that whilst the grounds '*happily accommodates a college campus with a relatively small number of students who generally use public transport, the Site may be unsuitable for more intensive use.*'
- 7.6 Given these identified weaknesses, the Site SPD highlights that redevelopment of the Site poses threats, the first being; '*Certain uses, particularly ones that increase traffic in the area, could have a harmful impact on the amenity of local residents, especially in Kensington Square, South End, and South End Row.*'
- 7.7 As already noted, South End provides the only vehicular access to the Site at present. In respect of access, the Site SPD highlights that; '*The Site is isolated*

*with vehicle access only from South End and this access is narrow and close to residential properties.'*

7.8 Against the backdrop of these constraints, the Site SPD identifies areas within an Indicative Site Layout (based on the current College boundary) which retains vehicular access from South End, with restored/refurbished buildings in the northern portion of the Site, communal open space in the central area and redevelopment of the southern section.

7.9 The proposals for the Site constitute a major development and comprises:

*Reinstatement of three townhouses (Class C3), (part of 23 and 24 Kensington Square); refurbishment of college building (part of 23 Kensington Square) and use as an extra care facility (Class C2). Demolition of all other buildings on site. Erection of deck over adjacent London Underground line and construction of 5 buildings (ranging between 1 and 8 storeys in height) for use as an extra care facility including units, communal facilities and services areas, community hall and on-site affordable housing and associated access parking, servicing and landscaping.*

7.10 In contrast with the Site SPD, the proposed redevelopment of the Site extends beyond the Heythrop College boundary to include additional development land which would be created via a proposed new deck over the Circle & District lines to the south of Kensington High Street Underground Station.

7.11 Despite this departure from the SPD, all vehicular access is proposed to remain via South End, and; despite extending the developable area, no alternative access arrangements have been promoted. The additional development land increases the overall site area by a further 21% over and above that which was covered within the SPD.

7.12 The current application is supported by a TA prepared by Arup and other related traffic management documents prepared by AIA Consulting. In addition to the

TA, these additional documents provide some further information relating to construction activity from which impact can be judged.

- 7.13 In its current form, the proposed development would be unsuitable in respect of transport and highways matters, both during its construction and its operation, for the reasons set out below.
- 7.14 The TA does not include any detailed plan of South End in respect of its constrained layout, poor footway provision and other limiting features. TTHC's review has demonstrated the constrained nature of South End as highlighted within the SPD as *'narrow and close to residential properties and not wide enough to accommodate a significant increase in traffic or large lorries.'*
- 7.15 Site Photographs show the layout and characteristics of South End and which demonstrate the constrained nature of this residential street.
- 7.16 South End is a narrow cul-de-sac with some parts measuring only 4.0m in width on site, having regard to the resident permit on-street parking bays. The proposed access route is largely constrained to single passage of such vehicles.
- 7.17 The TA misrepresents the type of service vehicles which would need to route via South End in order to serve the development.
- 7.18 Footway provision on South End is poor, with only short narrow sections available to some properties and no footway provision whatsoever for others. There are garages and front doors with direct frontage access into the carriageway.

PROPOSED REDEVELOPMENT  
HEYTHOP COLLEGE, KENSINGTON  
TRANSPORT REVIEW (OBJECTION)

- 7.19 South End is cobbled and has Mews characteristics, in common with other streets within the Kensington Square conservation area. For much of its length it functions as a shared surface cul-de-sac.
- 7.20 There are issues relating to vehicle inter-visibility between other vehicles and pedestrians, owing to the alignment of South End and the direct frontage access which some garages and properties have onto the carriageway, as shown in the photographs.
- 7.21 There is no recognition within the TA of the constraints which exist nor the lack of footway provision, even based on existing levels of pedestrian and vehicular activity.
- 7.22 There will be 24 hour public access through to South End as a consequence of the proposals which would increase the potential for vehicle/pedestrian conflict.
- 7.23 The vehicular activity associated with South End has been limited for a number of years and no data has been provided within the TA which shows the existing levels of demand, despite this information having been surveyed.
- 7.24 The observed traffic activity would also provide the context for the most recent safety record for this location.
- 7.25 As specifically identified within the Site SPD, South End is not a road which is suitable for any material increase in traffic of any kind. The Site SPD recognises that whilst the grounds *'happily accommodates a college campus with a relatively small number of students who generally use public transport, the Site may be unsuitable for more intensive use.'*
- 7.26 The direct frontage access characteristics of South End are such that it is entirely unsuitable to mix residents and other pedestrian activity with any

increased level of service activity in particular. Aside from the obvious amenity impacts, such increases would pose an increased danger for pedestrians who currently have limited protection in terms of footway provision and carriageway width. Such considerations have been clearly set out within the Site SPD.

- 7.27 In terms of a service access South End is sub-standard and hence it is unacceptable to encourage an increase in service activity. No doubt such characteristics were borne in mind when RBKC adopted the Site SPD: '*Certain uses, particularly ones that increase traffic in the area, could have a harmful impact on the amenity of local residents, especially in Kensington Square, South End, and South End Row.*'.
- 7.28 Given the complete reliance of the application on South End and its recognised constraints as providing both the only construction and vehicular site access, it is surprising that an independent Road Safety Audit has not been provided.
- 7.29 The nature and characteristics of South End are such that any increase in traffic associated with the proposals will give rise to unnecessary increased risks and highway safety issues as well as impacts in respect of residential amenity.
- 7.30 The existing buildings within the Site relate to residential and non-residential education uses. These are recognised within the Site SPD as generating only low levels of vehicle movements.
- 7.31 The application relates to an Extra Care development of 142 units, three residential townhouses, five on-site affordable housing, and a community hall. There would be 179 full-time equivalent employees.
- 7.32 The total development floorspace would triple in size as a consequence of the proposals.

**PROPOSED REDEVELOPMENT  
HEYTHOP COLLEGE, KENSINGTON  
TRANSPORT REVIEW (OBJECTION)**

- 7.33 The SPD acknowledges that access is extremely limited and that although the Site happily accommodates a college campus, with a relatively small number of students who generally use public transport, it may be unsuitable for more intensive use. There is one vehicle access point via South End, which is not wide enough to accommodate a significant increase in traffic or large lorries.
- 7.34 With regard to service vehicles, the SMP suggests that there would be an average of 29 daily deliveries, i.e. 58 two-way vehicle movements. This excludes general waste collection and clinical waste collection movements, so the true total would be higher. This would represent a significant and ongoing increase in large vehicle movements using South End.
- 7.35 Although the SMP states that delivery times will be booked in advance, inevitably sometimes multiple vehicles will arrive at the site in close proximity, which increases the risk of vehicles meeting on South End or on other constrained sections of the access routes.
- 7.36 With regard to construction activity, the CEMP suggests that construction vehicles would route from the A315 Kensington Road via Victoria Road, St Albans Grove and South End to the existing access gate into the Site.
- 7.37 The geometry along this route is fairly restrictive: the typical carriageway width on St Albans Grove is around 6.0m (including on-street parking), and the kerb radii at junctions are as small as 2m.
- 7.38 The sections of Victoria Road and St Albans Grove on this proposed route have significant lengths of on-street parking. There are also five parking spaces on South End close to the Site access gate.

- 7.39 This route overlaps on St Albans Grove with a 'Quietway' cycle route and so the use of this route for large construction vehicles will therefore reduce the safety of cyclists using this route.
- 7.40 The swept paths provided by the applicant show that some of the on-street parking bays would need to be suspended, with some construction vehicles requiring all South End parking bays to be suspended. Some of the tracking shows construction vehicles over-running kerbs/footways and the need to remove street furniture. The plots are based on OS mapping only which (as already noted in the case of South End) may not reflect precisely the geometry of the highway routes.
- 7.41 With regard to construction traffic volumes, it is noted that separate Traffic Management Plans have been prepared for the 'Demolition and Deck Overbuild' and 'Construction' phases. Each of these documents provide the Applicant's estimate of the service vehicle volumes (which will be predominantly HGVs) which are presented as one-way movements and summarised in charts.
- 7.42 During the 5 year development construction, there is a period of overlap between activities which provide a combined daily total (based on the Applicant's estimates) of up to 100 construction vehicle movements (two way) each day. These are **average** figures and so there will be inevitable peaks and troughs which would mean higher levels of activity on some days.
- 7.43 The overall length of the proposed access route from Kensington Road via Victoria Road, St Albans Grove and South End to the access gate is around 0.57km. Owing to on-street parking and restricted widths, for approximately half of this distance there is no space for vehicles to pass each other.

- 7.44 Even on the basis of the Applicant's estimates of **average** daily peak activity, there would be 100 HGV movements per day. During school term time, this equates to an **average** of just over 18 HGVs per hour or a vehicle movement over the 0.57km access route every 3 minutes 18 seconds.
- 7.45 Having regard to the transit time of the access route, including manoeuvres through associated junctions, other highway constraints and background pedestrian/cycle/traffic volumes, it is estimated that it would take on average around 4-5 minutes to travel the route, meaning that there will inevitably be vehicle conflicts on sections only wide enough for one vehicle at a time. It would therefore not be possible to 'control' the impact of HGVs on the surrounding highway network.
- 7.46 This assessment is based solely on the Applicant's estimates of its Site construction traffic and does not include any other existing traffic using the access route.
- 7.47 In any event, even on the basis of the Applicant's figures, the implications for residents of South End (and other parts of the Access Route) would be unacceptable.
- 7.48 The Applicant's proposed construction period is 5 years, which in itself is significant. In addition, based on the Applicant's traffic estimates, there would be 3 out of the 5 years when construction traffic volumes would be between 20 and 100 movements every weekday.
- 7.49 The traffic associated with the deck and demolition activities are estimated by the applicant to be particularly high and this in part at least can be attributed to the proposals departing from the extents of the SPD by way of inclusion of the creation of additional development land over the rail lines.

PROPOSED REDEVELOPMENT  
HEYTHOP COLLEGE, KENSINGTON  
TRANSPORT REVIEW (OBJECTION)

- 7.50 With regard to the operational development, the TA has not used observed flow information for the existing land use. This data should be provided as it presents the context against which the proposals can be assessed, including what traffic volumes relate to the current safety record for this location.
- 7.51 Furthermore, the observed survey data would also capture general traffic associated with other land uses in the vicinity of the Site, including residential trips, and so this data should be made available.
- 7.52 If the applicant's argument is that educational use of the Site, such as that which exists at present, is no longer viable then the generated Baseline (rather than the observed) would appear to be erroneous. If the promoted baseline were achievable, then surely the viability argument would not exist.
- 7.53 The TA includes an analysis of vehicle trip generation for the consented College use and the proposed development, both of which are flawed.
- 7.54 The TA concludes that "*there is forecast to be a minor increase in daily total vehicle trips*". However, 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 could in fact be much more significant and so the TA should include a more detailed assessment of the impact on the surrounding highway network.
- 7.55 South End not only provides the single vehicular access to the proposed development, it also serves as the only emergency vehicle access into the Site. Given the constrained nature of access and the type of residential development proposed (which may include a greater proportion of residents with mobility issues), the use of South End as both the only vehicle access and the emergency vehicle access poses an increased unnecessary risk.

**PROPOSED REDEVELOPMENT  
HEYTHOP COLLEGE, KENSINGTON  
TRANSPORT REVIEW (OBJECTION)**

- 7.56 The proposals will result in conflict with RBKC Local Plan Policies CT1 and CR7 as well as other policy and guidance contained within RBKC's Transport & Streets SPD and its Road Safety Strategy as well as other guidance provided in the DfT's Manual for Streets.
- 7.57 It is therefore concluded that the proposed access arrangements via South End would result in the intensification of traffic activity, including HGVs, on what is currently a very quiet street which will pose unnecessary risks to pedestrian safety. The applicant has failed to demonstrate that the proposed arrangements would operate safely and effectively, both during the construction stage and for the ongoing operation of the Site.
- 7.58 The submitted Transport-related material associated with the planning application has failed to adequately assess the true implications of the proposals in respect of highway matters or demonstrate their acceptability.