



Responses to the Inspector

Matter 8: Better Travel Choices and An Engaging Public Realm

Core Strategy with a focus on North Kensington
 Examination in Public
 July 2010

Public Examination of Royal Borough of Kensington and Chelsea's Core Strategy with a focus on North Kensington DPD

Royal Borough of Kensington and Chelsea's Statement

Matter 8 – Better Travel Choices and An Engaging Public Realm

Question 1

Chapter 32, para 32.3.9 and Policy CT1, criterion (i), emphasises the importance of improving the north-south links across the Borough. How will this be achieved, and will there be consequences for the built heritage and the objective of renewing the legacy?

- 1.0 *Policy CT1 (i) does not have significant negative consequences for the built heritage and the objective of renewing the legacy.*
- 1.1 Policy CT1 (i) states that the Council will “work to ensure that public transport services, and access to them, are improved, giving priority to north-south bus links and areas that currently have lower levels of accessibility”. This policy is focused on improvements to public transport services and access to them. It does not relate to traffic. I assume that the question is, in part, derived from the concerns raised by the Norland Conservation Society (NCS). The NCS have issued a statement that covers both public transport and traffic matters. As the Inspector's question relates solely to public transport I will not address the traffic matters in this response. The NCS are particularly concerned about the two bus routes that pass through Royal Crescent.
- 1.2 It should be noted that north-south links are only one part of the broader policy at CT1 (i). Improvements to north-south links can be achieved in a number of different ways. These include, but are not limited to:
- more frequent and longer trains on the West London Line in order to significantly increase capacity on the route
 - a new rail station on the West London Line at North Pole Road, which would connect Imperial Wharf in Chelsea with north Kensington.
 - extending north the C3 bus route, which enters the Borough in Lots Road and currently terminates at Warwick Road
 - New bus services or increased frequency on existing routes that travel north-south.
- 1.3 The NCS state that the Strategic Objective for Renewing the Legacy cannot be achieved whilst improving north-south public transport links. While the Council would consider proposals to route new bus services along Royal Crescent and St Anne's Villas, the need for improve north-south links is not predicated on this. Indeed the changes set out above may not require any increases in bus services in the vicinity of Royal Crescent, the only measure that is likely to have an impact on Royal Crescent. The increase in residential density further north in the Borough at

the Kensal Gasworks site, which the NCS refer to, is likely to increase demand on public transport principally in an east-west direction rather than north-south. This is due to the concentration of employment opportunities in the centre and east of London. Any increases in traffic or public transport demand on Royal Crescent, as a result of development further north in the Borough, are likely to be marginal.

- 1.4 The built environment of the Borough is particularly rich with over 70% within conservation areas and over 4000 listed buildings. A large proportion of the urban fabric, including the road network, was constructed during the 18th and 19th Centuries. This means that there will inevitably be tensions in providing for the much greater travel demands of the Borough's residents in the 21st Century. It would simply not be possible to accommodate the demand for public transport services without encroaching to some degree in these areas, including those such as Royal Crescent. Focusing on North Kensington it is noticeable that north of Holland Park Avenue there are only three potential routes that can accommodate bus services – these are Royal Crescent / St Anne's Villas, Ladbroke Grove and Pembridge Road. Of these three routes Royal Crescent / St Anne's Villas carries two bus services, Pembridge Road carries four and Ladbroke Grove carries six. This represents a balanced approach between providing services and respecting the built environment.
- 1.5 If the two bus routes were removed from Royal Crescent, they would need to be diverted via North Pole Road into the London Borough of Hammersmith and Fulham. This would leave a large area of north west Kensington unserved by buses and would reduce significantly the ease of access to the public transport network for thousands of residents and visitors to the area. The part of the Borough that would be left unserved by buses includes several large housing estates, Latimer Road Underground Station and the proposed Kensington Academy. The Academy is an integral part of the vision for the Latimer place (CV9) and Policy CA4 of the North Kensington Sports Centre site allocation. Due to the provision of free travel on buses for students of school age and the local catchment of the Academy, buses and walking are likely to be the main modes of transport used by pupils and without these bus routes the site would not be adequately accessible.
- 1.6 The NCS refer in their statement to previous plans to create a new road link from the Freston Road area to the West Cross route, however we are not aware of there ever being any adopted plans to do this. Given the significant changes in levels surrounding the West Cross Route near Freston Road, a new road link would require significant land take and demolition of existing buildings. TfL are the highway authority for the West Cross Route and they are extremely unlikely to permit an additional junction at this location on road safety and traffic congestion grounds. On this basis there are no realistic alternatives to using Royal Crescent and St Anne's Villas for bus routes. This type of scenario is not uncommon in Central London or other major cities in the United Kingdom. The fabric of the area is preserved although it is acknowledged that residential amenity can at times be affected. The Council will continue to find local solutions where these are possible, but given the legacy of the existing townscape this is not always possible.

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Question 2

Criterion (b) of Policy CT1 requires that new development should not result in any material increase in traffic congestion or on-street parking pressure whilst (c) requires that additional new residential development should be permit-free. Is the Policy, as drafted, unduly restrictive and contrary to national guidance?

- 2.0 *No, CT1 is not too restrictive as currently drafted. It is consistent with PPG13 and the Mayor’s draft London Plan and responds to the unique characteristics of the Borough, particularly high levels of parking demand and the constrained nature of the road network.*
- 2.1 Policy CT1 (b) requires “it to be demonstrated that development will not result in any material increase in traffic congestion or on-street parking pressure”. DP9 considers CT1 (b) to be unduly restrictive and unsound because it is not consistent with national policy, namely PPG13. DP9 state that PPG13 “does not prevent new development from coming forward where it can be demonstrated that effects of the proposal on the road network are acceptable.” However this is not a quotation from PPG13. The closest text to this in PPG13 is in paragraph 43 where it states that Local Authorities “should not reject proposals where small-scale business development or its expansion would give rise to only modest additional daily vehicle movements, in comparison to other uses that are permitted on the site, and the impact on minor roads would not be significant.” However, this text relates to rural areas. The reference is not relevant to this Borough.
- 2.2 In any case the Council believes that Policy CT1 (b) is entirely consistent with DP9’s statement. If it can be demonstrated that the effects of a proposal on the road network are acceptable then self evidently the development does not result in a material increase in traffic congestion and vice versa. This would need to be demonstrated by way of a Transport Assessment as required at paragraph 23 of PPG13 and in Policy 6.3 of the draft London Plan and Policy CT1 (h) of the Submission Core Strategy.
- 2.3 As set out in the Submission Core Strategy at paragraph 32.3.6 the Borough’s road network is heavily constrained with limited possibility of capacity increases. Any significant increases in road traffic would have serious impacts on residential amenity. It is stated throughout PPG13 that “people should come before traffic” (paragraph six, 28, 67). In this context the Council considers Policy CT1 (b) to be entirely consistent with PPG13. The main objectives of PPG13 are to:

1. promote more sustainable transport choices for both people and for moving freight;
 2. promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and
 3. reduce the need to travel, especially by car.
- 2.4 Policies CT1 and CT2 contain a number of positive measures which meet these objectives, such as locating development in areas of good PTAL, reducing car parking levels, requiring improvements to the walking and cycling environment, requiring Travel Plans, improving public transport services, better use of the Borough's waterways and protection of the pedestrian environment, including rights of way. Given the pressures on the road network of high volumes of traffic and the impossibility of securing any significant capacity increases the Council considers it entirely appropriate to state that, in addition to contributing to the improvements and meeting the requirements set out above, development must also demonstrate that it does not worsen existing levels of traffic congestion.
- 2.5 The Mayor's draft London Plan, in Policy 6.3 (b), states that *"where existing transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans exist for an increase in capacity to cater for this, boroughs should ensure that development proposals are phased until it is known these requirements can be met, otherwise they may be refused."* Increasing demand on parts of the road network where there is not sufficient capacity will create or exacerbate congestion. Policy CT1 (b) is consistent with the draft London Plan.
- 2.6 DP9 state that *"occupiers of new residential development, particularly market housing are likely to require access to a car"* and that there should be *"no absolute requirement for permit-free development..."* Policy CT1 (c) requires *"that all new additional residential development be permit-free."* This policy is essential. The Borough experiences very high levels of on-street residents' parking demand such that the occupancy level of spaces is at saturation levels (90% occupancy or above) in most of the Borough and at most times of the day and night (Buchanans, 2007). These high levels of parking pressure have arisen because of a historic lack of off-street car parking in the Borough's predominantly 19th Century housing stock, which has led to a high reliance on on-street car parking. The impacts of high parking demand are well known and include:
- drivers being forced to circulate around an area seeking empty spaces which causes unnecessary congestion, environmental pollution and noise disturbance;
 - drivers being tempted to park in dangerous or inconvenient locations, such as close to junctions or on pedestrian crossing points;
 - drivers having no choice but to park some distance from their homes causing inconvenience and more serious problems for elderly residents.

- 2.7 There are 28,000 residents' bays on-street and approximately 36,000 permits on issue within the Borough. Residents have to rely on single yellow lines before and after controlled hours, or the one hour's grace period on pay and display bays at the beginning and end of controlled hours, in order to deal with this shortfall. Allowing new residential dwellings to have access to on-street parking would increase the already unacceptably high levels of on-street parking pressure experienced in the Borough, with associated increases in traffic congestion, air pollution and inconvenience for residents.
- 2.8 The majority of the Borough has good access to public transport services and a wide range of facilities and services are provided locally such that access to a car is not essential. This is demonstrated by the fact that only 49% of households have access to a car in the Borough (Census, 2001). The Council has also recently expanded its on-street car club network to 200 locations, which gives Borough residents access to the densest car club network in the country. This means that for those trips or activities where a car is needed there is a cost effective and convenient alternative to private car ownership available. Notwithstanding the above the permit-free policy does not preclude residents from owning a car and there are a number of off-street car parks and garages available in the Borough.
- 2.9 Guidance on permit-free was first adopted in 2004, in the *"Permit-free and Car-free plus Permit-free Residential Development"* SPG. The SPG was replaced by the Transport SPD in December 2008 which states in paragraph 3.1.2 that *"In order to ensure that development is not contrary to [UDP policy] TR36 and does not add to on-street parking demand all new additional residential units will be required to be permit free."* Section 3.1 of the Transport SPD provides a full justification for this and sets out how the guidance should be applied. Nearly 350 applications have been granted where the permit-free requirement has been applied.

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Question 3

Para 32.3.10 has additional text referring to opportunities to provide cycle and pedestrian links within new developments along the western boundary of the Borough. Should an additional criterion be included within Policy CT1 requiring such provision in new developments?

- 3.0 *No, an additional criterion should not be added to Policy CT1. There are limited development sites within the Borough that have the potential to accommodate cycle and pedestrian links. Where there is the potential the 'places' and site allocations chapters have identified these. Policy CT1 already requires improvements to the walking and cycling environment, and there are many ways that cycling can be facilitated beyond provision of specific links.*
- 3.1 An objection on the subject of linked cycle paths implies that paths are the only way of providing for safe cycling. The objection goes on to state that the lack of a policy to promote cycle paths indicates that the 'most appropriate strategy' has not been adopted when considered against the reasonable alternatives and that the Submission Core Strategy therefore fails the tests of soundness set out in PPS12. The Council is not aware of any evidence to suggest that cycle paths are safer than cycling without segregation on the carriageway. Indeed a significant body of research undertaken in Europe, the UK and US indicates that segregated cycle paths tend to increase accidents and drivers leave less space for cyclists where cycle lanes are marked on the road (GaËrder et al., 1994; Wachtel and Lewiston, 1994; McClintock and Cleary, 1996; Franklin, 1999; TRL, 2002; Godefrooij, 2003; Pasanen, 2005; TRL, 2004a; TRL, 2004b; TRL and TfL, 2005; DfT, 2007; Parkin and Meyers, 2009).
- 3.2 This occurs for a number of reasons:
- The vast majority of collisions on urban roads occur at junctions and it is there that collisions between bicycles and motor vehicle are often increased by the introduction of a segregated cycle path. The main reason for this tends to be motorists not giving way to cyclists at side roads or crossing from the main carriageway into the path of cyclists on the path.
 - Segregated paths and cycle lanes located adjacent to the main carriageway tend to place cyclists out of the motorist's view, and away from where motorists will be most concerned about collision, i.e. in the centre of the

main carriageway where other cars can be expected. This effect is compounded on two-way cycle paths because motorists may not be expecting cyclists travelling against the prevailing flow of traffic.

- The provision of cycle tracks may lull cyclists into a false sense of security that can encourage less careful cycling and therefore more accidents.
- By encouraging cyclists to stick to the edge of the road at junctions, cycle lanes make cyclists less visible to motorists who are then more likely to pull out into the path of the cyclist. In addition by dividing up the carriageway into cycle lanes and general running lanes motorists appear to be less inclined to modify their behaviour and will often pass closer to cyclists and at greater speed than if no lane was provided.

- 3.3 Given the lack of evidence to suggest that cycle paths and lanes make cycling safer it is not surprising that Manual for Streets, published by the Department for Transport (DfT) in 2007, states that cyclists should generally be accommodated on the carriageway. Similarly the Cycle Campaign Network, an umbrella organisation of 70 cycle groups, produced a position paper in 2007 which states *“Cycle Campaign Network knows of no evidence that cycle facilities and in particular cycle lanes, generally lead to safer conditions for cycling.”*
- 3.4 Given this evidence the premise of the objector, that cycle paths will increase safety, is not accepted. With this in mind page 70 of the Council’s document *“Transport and Streetscape Policies”* sets out the Council’s approach to cycling, which is to *“encourage a safe mix with other traffic and not to provide separate road space.”* Adopting a policy in the Core Strategy to promote cycle paths would be counter to the Council’s published approach to cycling and counter to the weight of academic evidence, which suggests cycle paths increase accidents.
- 3.5 In order to respond to, and support the continued growth in, demand for cycling, adequate cycle parking facilities must be provided and cyclists must be able to use attractive and direct routes. This approach is captured within paragraph 32.3.10 of the Submission Core Strategy and Policy CT1 (f) and (g). The Council has expanded its network of on-carriageway cycle parking bays and trialled innovative ways of providing additional cycle parking, such as in the centre reservation of Kensington High Street and by the use of ‘Cycle hoops’ on sign posts. In 2009 the Council trialled a scheme to allow two-way cycling in a number of one-way streets using No Entry signs with Except Cycles plates. We were the first authority to be allowed by the DfT to do this. This scheme allows cyclists more direct access through the Borough than is possible in a car and is a tangible example of making cycling more attractive than driving, a key element of the strategic objective for Better Travel Choices.
- 3.6 It is generally accepted that an increase in cycle numbers will decrease the rate of accidents amongst cyclists (Docherty and Shaw, 2003; TfL, 2004). This phenomenon is a consequence of the increased visibility of cyclists on the roads as numbers increase, which means that drivers modify their behaviour and begin to accept

cyclists as legitimate road users, and also results from the increased likelihood that drivers will themselves be likely to cycle or at least know someone who does. This effect is seen in London where cycle trips have increased by 70% since 2001 but there have not been similar increases in casualties. The introduction of the London Cycle Hire Scheme in July 2010 will further increase the number of cyclists on the Borough's roads and contribute to an increasingly cycle friendly environment. The Borough wholeheartedly supports this scheme and will host around 50 docking stations.

- 3.7 Given the relatively limited amount of undeveloped land and green space in the Borough the provision of new cycle paths off-street will never deliver a convenient network of cycle paths through the Borough. Notwithstanding the improvements included within the 'places' and strategic sites chapters, the focus must be on improving conditions on-street, in the ways set out above, and by continuing to maintain the Borough's road network to a high standard. It is in this way that the maximum benefits for cyclists can be achieved.
- 3.8 Off-street cycle paths can contribute to the overall convenience of the cycle environment in the Borough and the Council takes every opportunity to improve off-street cycle paths. In the past two years we have resurfaced, widened and improved paths through Holland Walk, Brompton Cemetery and the Grand Union Canal. The Warwick Road Planning Brief identifies at paragraph 6.31 the requirement for a north-south link through the development sites to link with the LCN+ on Russell Road. This is acknowledged and extended in paragraph 32.3.10 of the Submission Core Strategy. As a part of the Central London Greenways Strategy, drafted by Sustrans, these open spaces have been identified as cycling routes in the Borough which can provide convenient 'short cuts' for cyclists. Sustrans have identified quiet residential roads to link these routes, creating a Greenways map for Central London.
- 3.9 The Council has produced a map which shows the LCN+ cycle network within the Borough, locating places of interest and bike shops in relation to it. This map is distributed at events in the Borough, such as Environment Day, as well as in Council buildings and libraries. It is also distributed to those who undertake free cycle training in the Borough. Furthermore TfL provide free cycle route maps that cover the whole of Greater London and include:
- Signed cycling routes
 - Quieter routes recommended for novice cyclists
 - Greenways through parks and along canals
 - Off-carriage way alternatives to busy roads
 - Stations with cycle parking
 - Useful information and contacts

These maps are a much more effective way of raising awareness of cycle routes in the Borough than providing a plan in the Core Strategy.

3.10 For the reasons set out above the most appropriate strategy has been adopted within the Submission Core Strategy, which is to provide a safe cycling environment on all of the Borough's roads, provide sufficient cycle parking, utilise off-street cycle paths where they are of benefit and to reduce barriers for cyclists, through measures such as introducing two way access for cyclists on one way roads. Where there is the potential for new cycle and pedestrian links as a result of development these have been identified in the 'places' and sites allocations chapters. Policy CT1 (f) requires new development to deliver improvements to the walking and cycling environment and an additional criterion would represent unnecessary duplication. The approach proposed is consistent with PPS12 and is considered sound. As a result no changes are proposed to the Submission Core Strategy.

3.11 References cited

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