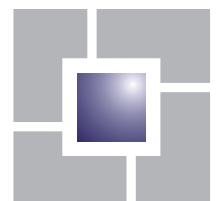


**Devonshire House School
Hampstead, NW3 6PD**

Hearing Statement of
Simon Parfitt

*On Matters of Transport Impact
On behalf of Devonshire House School*

LPA Ref: **2015/1635/P**
PINS Ref: **APP/X5210/W/16/3147225**



david tucker associates
transport planning consultants

**Devonshire House School
Hampstead, NW3 6PD**

*Hearing Statement of
Simon Parfitt*

6th July 2016
SKP/18178-03b HS Transport

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Prepared For:

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Table of Contents

1.0	QUALIFICATIONS AND EXPERIENCE	1
2.0	SCOPE AND NATURE OF THE EVIDENCE	2
3.0	POLICY CONTEXT	5
3.1	National Planning Policy Framework (2012)	5
3.2	London Plan – Further Alterations to the London Plan (2015)	5
3.3	London Borough of Camden Core Strategy (2008)	5
3.4	London Borough of Camden Local Development Framework (2010)	8
4.0	EVALUATION OF THE DEVELOPMENT PROPOSALS	11
4.1	Summary of DTA Transport Assessment	11
4.2	Third Party Representations	11
4.3	The Council	13
5.0	SUMMARY AND CONCLUSIONS	18

Appendices

Appendix SP1 **DTA Report 18178-02e** Transport Assessment

1.0 QUALIFICATIONS AND EXPERIENCE

- 1.1 My name is Simon Kenneth Parfitt and I am a Director of David Tucker Associates with responsibility for development planning projects. The consultancy specialises in expert advice on transport related problems throughout a broad range of projects for both the public and private sector. In particular, my expertise lies in evolving transportation strategies, identifying solutions and negotiating agreements.
- 1.2 I have over 20 years' experience in the planning and design of a wide variety of projects mainly in the private sector, although with some experience in the public sector, specialising in highways, traffic and transportation planning and design, including traffic and environmental impact studies.
- 1.3 I hold a Bachelor of Arts degree in Geography from Birmingham University and a Master of Science degree in Transportation Studies from Cranfield Institute of Technology. I have chartered status, being a member of the Institute of Transport, the Institute of Logistics and Transportation and the Institute of Highways and Transportation, and I have fully familiarised myself with No. 69 Fitzjohn's Avenue (the "Site"), and surrounding area for the purposes of preparation of this statement.
- 1.4 I am well acquainted with the local area and the surrounding transport infrastructure network.

2.0 SCOPE AND NATURE OF THE EVIDENCE

2.1 This evidence has been prepared on behalf of Devonshire House School (the "School").

2.2 The Development comprises:

- Extension of the existing basement area, new lightwells to the south and north elevations and the erection of a glazed flat roof rear extension to incorporate a staff room.

2.3 The original planning application was registered with the London Borough of Camden (the "Council") on 8th April 2015. Notwithstanding that the scale of development would not ordinarily warrant a formal transport appraisal in the context of the advice within the Guidance for Transport Assessment (DfT, 2007) – now withdrawn, the application was supported by a Transport Statement prepared by TPP Consulting Ltd. This report sets out the policy context, development description, together with a qualitative appraisal of the operation of the local road network. The Transport Statement's conclusions included the following:

- i) "The proposals in the plan submitted are not for development of extra classrooms but for improvements to buildings and thus the development will not in itself generate any significant vehicular traffic" (para 1.4, and see also para. 4.2);
- ii) "Site observations indicate that the area is congested at peak times, ... though that in itself parent drop off/collection activity relating to the [appeal] site did not contribute materially to the situation" (para. 2.13);
- iii) Recent surveys for the School indicated that "a significant proportion of pupils (c.80%) travel by sustainable modes of transport" (para. 2.21);
- iv) The Site is very accessible by non-car modes (see section 3) including walking, cycling, bus services (public and provided by Transport 4 Schools); London Underground and Overground Services. The Site has a PTAL rating of 5.

v) "... the proposals are not for development of extra classrooms but for improvements to buildings. A replacement teaching room will be created at basement level with an existing teaching room on the top floor level converted to a learning support room. A dedicated dining room will also be provided replacing an existing facility which is used as a combined dining room, teaching room and play area, which is far from ideal" (para. 4.7) and "[t]herefore, the development will not in itself generate any significant vehicular traffic" (para. 4.8);

vi) "A review of the relevant transport policies at national, regional and local level in the context of the development proposals has been undertaken and it is considered that the proposals are consistent with national and local transport policy guidance" (see section 5 and para 6.9)

vii) In conclusion:

"6.4 The proposals aim to improve the existing school facilities, improve the connectivity and circulation with the basement level and the rear garden, enhance the character of the building and improve the energy performance of the building.

6.5 The proposals in the plan submitted are not for development of extra classrooms but for improvements to buildings and thus the development will not in itself generate any significant vehicular traffic.

6.6 Given the above, the proposals will not result in any change to the trip generating characteristics of the site and as a consequence the effect of the proposals on the local transport network will be negligible."

2.4 This TPP appraisal is appropriate in scope and methodology and no issues were identified by the Transport and Highways department of the Council.

2.5 It was agreed between the parties that the determination of the application would be extended to 30th September 2015. As set out in the Appeal Statement, there were on-going discussions during this period relating to the appropriateness or otherwise of a possible condition to limit pupil numbers. An appeal against non-determination

of the application was lodged on 24th March 2016.

2.6 David Tucker Associates were instructed to review the transport and traffic implications of the proposed development in April 2016. This review is set out in a Transport Assessment Report (DTA Report 18178-02e TA – see **Appendix SP1**). The review includes an independent qualitative appraisal of the existing operation of the local transport network together with additional survey work and quantitative analysis of the sensitivity of the local transport network to educational development more generally. The review concludes that:

- Additional children on the Site are unlikely to change education travel patterns in the local area, if they were not going to the Site they would likely go to other local schools.
- The operation of the local network is not sensitive to pupil numbers at the Site.
- Extra drop offs and pick-ups would represent only small percentage increases and would not result in a tangible change in network operation.

2.7 The findings of the DTA Transport Assessment ("TA") should be considered in parallel with this Hearing Statement. Similarly information from the TPP Transport Statement ("TPP TS") is also relied upon. I do not report at length sections of either the TPP TS or the TA, but the findings within combine to form my position on behalf of the Appellant.

2.8 I have considered the sensitivity of the local transport network to changes in the pattern of demand together with matters of transport impact in terms of relevant local and national policy and guidance. I conclude that the proposed development would not have a material impact on the operation of the local transport network and the proposals fully accord with the criteria set out in the National Planning Policy Framework at paragraph 32 (See section 3.1).

3.0 POLICY CONTEXT

3.1 National Planning Policy Framework (2012)

3.1.1 In March 2012, the Department of Communities and Local Government published the National Planning Policy Framework ("NPPF"). The NPPF sets the following tests in relation to development:

"All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up, depending on the nature and location of the site, to reduce the need for major transport infrastructure;*
- safe and suitable access to the site can be achieved for all people; and*
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*

Paragraph 32

3.1.2 The policy therefore advises that development should only be prevented on transport grounds where the cumulative impacts are **severe**.

3.2 London Plan – Further Alterations to the London Plan (2015)

3.2.1 The London Plan is the overall strategic plan for London which sets out the framework for the development of London over the next 20-25 years. The original Plan was published in 2011 with amendments in 2013 and 2015.

3.3 London Borough of Camden Core Strategy (2008)

3.3.1 The London Borough of Camden Core Strategy was adopted on 8th November 2010. It therefore pre-dates the National Planning Policy Framework. There are a number of policies within the Core Strategy that the Council deem relevant to this application. These are:

CS11 (Promoting sustainable and efficient travel)

The Council will promote the delivery of transport infrastructure and the availability of sustainable transport choices in order to support Camden's growth, reduce the environmental impact of travel, and relieve pressure on the borough's transport network.

Improving strategic transport infrastructure to support growth

The Council will promote key transport infrastructure proposals to support Camden's growth, in particular:

- a) King's Cross station improvements;*
- b) the redevelopment of Euston Station and the provision of an improved public transport interchange;*
- c) Crossrail services and associated station improvements at Tottenham Court Road;*
- d) improved interchange at West Hampstead;*
- e) improvements to facilities at Camden's London Underground and Overground stations, including at Camden Town and Holborn;*
- f) improvements to encourage walking and cycling as part of transport infrastructure works. The Council will protect existing and proposed transport infrastructure (including routes for walking, cycling and public transport, interchange points, depots and storage facilities) against removal or severance.*

Promoting sustainable travel

In order to support Camden's growth and to promote walking, cycling and public transport, the Council will:

- g) improve public spaces and pedestrian links across the borough, including by focusing public realm investment in Camden's town centres and the Central London area, and extending the 'Legible London' scheme;*
- h) continue to improve facilities for cyclists, including increasing the availability of cycle parking, helping to deliver the London Cycle Hire Scheme, and enhancing cycle links;*
- i) work with Transport for London to improve the bus network and deliver related infrastructure, and support proposals to improve services and capacity on the tube, London Overground and Thameslink.*

Making private transport more sustainable

As part of its approach to minimising congestion and addressing the environmental impacts of travel, the Council will:

- j) expand the availability of car clubs and pool cars as an alternative to the private car;*
- k) minimise provision for private parking in new developments, in particular through:
 - car free developments in the borough's most accessible locations and*
 - car capped developments;**
- l) restrict new public parking and promote the re-use of existing car parks, where appropriate;*
- m) promote the use of low emission vehicles, including through the provision of electric charging points; and*
- n) ensure that growth and development has regard to Camden's road hierarchy and does not cause harm to the management of the road network.*

Promoting the sustainable movement of freight

The Council will seek to reduce freight movement by road; encourage the movement of goods by canal, rail and bicycle; and minimise the impact of freight movement on local amenity, traffic and the environment.

CS19 - Delivering and monitoring the Core Strategy

The Council will work with Camden's Local Strategic Partnership and its other partners to deliver the vision, objectives and policies of this Core Strategy. We will:

- a) work with relevant providers to ensure that necessary infrastructure is secured to support Camden's growth and provide the facilities needed for the borough's communities. Information on the key infrastructure programmes and projects in the borough to 2025 are set in Appendix 1;*
- b) use planning obligations, and other suitable mechanisms, where appropriate, to
 - support sustainable development,**

- *secure any necessary and related infrastructure, facilities and services to meet needs generated by development, and*
- *mitigate the impact of development;*
- c) *work with neighbouring boroughs to co-ordinate delivery across boundaries; and*
- d) *monitor the implementation of the Core Strategy against the Core Strategy Monitoring Indicators and publish the results in our Annual Monitoring Report.*

3.4 **London Borough of Camden Local Development Framework (2010)**

3.4.1 The London Borough of Camden Local Development Framework (LDF) was adopted on 8th November 2010. It therefore pre-dates the National Planning Policy Framework. There are a number of policies within the LDF that the Council deem relevant to this application. These are:

DP16 - The transport implications of development

The Council will seek to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links. We will resist development that fails to assess and address any need for:

- a) *movements to, from and within the site, including links to existing transport networks. We will expect proposals to make appropriate connections to highways and street spaces, in accordance with Camden's road hierarchy, and to public transport networks;*
- b) *additional transport capacity off-site (such as improved infrastructure and services) where existing or committed capacity cannot meet the additional need generated by the development. Where appropriate, the Council will expect proposals to provide information to indicate the likely impacts of the development and the steps that will be taken to mitigate those impacts, for example using transport assessments and travel plans;*
- c) *safe pick-up, drop-off and waiting areas for taxis, private cars and coaches, where this activity is likely to be associated with the development.*

16.16 For larger developments that would have implications for transport, but fall below the threshold for transport assessments, the following information will be required from applicants:

- *an indication of the scale, mode, type and frequency of all trips associated with the development on a daily basis;*
- *a description of how this transport demand can be accommodated by walking, cycling, public transport, and any other sustainable alternative modes of travel, as set out in policy DP17 below;*
- *an overview of how potential highway impacts associated with the construction of the proposed development will be remedied or mitigated, and how local amenity will be preserved during the construction period; and*
- *an overview of the servicing requirements of the development after occupation and of the servicing provision made to accommodate this.*

3.4.2 The policy requires the transport implications of any development to be appraised and for mitigation measures to be proposed where appropriate. Note that the National Planning Policy Framework amends the test such that proposals should **only** be refused when the residual cumulative impacts are **severe** (*emphasis added*).

DP17 - Walking, cycling and public transport

The Council will promote walking, cycling and public transport use. Development should make suitable provision for pedestrians, cyclists and public transport and, where appropriate, will also be required to provide for interchanging between different modes of transport. Provision may include:

- a) convenient, safe and well-signalled routes including footways and cycleways designed to appropriate widths;*
- b) other features associated with pedestrian and cycling access to the development, where needed, for example seating for pedestrians, signage, high quality cycle parking, workplace showers and lockers;*
- c) safe road crossings where needed;*
- d) bus stops, shelters, passenger seating and waiting areas, signage and timetable information.*

The Council will resist development that would be dependent on travel by private motor vehicles.

The Council will seek to secure travel interchange facilities in locations that maximise travel benefits and minimise environmental harm. Passenger transport interchanges should provide for the coordination of arrival and departure timetabling on different services as far as possible. Interchanges catering for longer distance journeys should include toilets, baby changing facilities and facilities to provide refreshment for travellers.

3.4.3 The policy there is broadly in line with NPPF paragraph 32, bullet point one, that requires opportunities for sustainable transport modes to be taken up.

DP21 - Development connecting to the highway network

The Council will seek to ensure that developments provide the minimum necessary car parking provision. The Council will expect development to be car free in the Central London Area, the town centres of Camden Town, Finchley Road/Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead, and other areas within Controlled Parking Zones that are easily accessible by public transport.

Development should comply with the Council's parking standards, as set out in Appendix 2 to this document. Where the Council accepts the need for car parking provision, development should not exceed the maximum standard for the area in which it is located (excluding spaces designated for disabled people). Developments in areas of on-street parking stress should be 'car capped'.

For car free and car capped developments, the Council will:

- a) limit on-site car parking to:
 - o spaces designated for disabled people,*
 - o any operational or servicing needs, and*
 - o spaces designated for the occupiers of development specified as car capped;**
- b) not issue on-street parking permits; and*
- c) use a legal agreement to ensure that future occupants are aware they are not entitled to on-street parking permits.*

Developments will also be expected to meet the Council's minimum standards for cycle parking set out in Appendix 2.

The Council will:

- d) strongly encourage contributions to car clubs and pool car schemes in place of private parking in new developments across the borough; and*
- e) seek the provision of electric charging points as part of any car parking provision.*

3.4.4 The policy therefore seeks to restrict on-site car parking on sites in accessible locations and requires cycle parking provision.

4.0 EVALUATION OF THE DEVELOPMENT PROPOSALS

4.1 Summary of DTA Transport Assessment

4.1.1 Section 2 of the TA considers the existing conditions to provide context to the development proposal. This section includes consideration of the demand for education travel generally within the area, the nature of the transport system, the Travel Planning of the School as well as a review of empirical data on traffic flows and personal injury accidents.

4.1.2 Section 3 of the TA considers the transport implications of the development proposals. The proposed development seeks to improve the facilities of the School at the Site; the application does not seek new floorspace for teaching. The proposals provide a new staff room for teachers, a new dining hall and a new classroom to replace an existing room that will be used for educational support. On this basis there would be no increase in the pupil numbers and therefore no increase in the trip generation of the proposals and thus no adverse impact on the local highway network could arise.

4.1.3 Notwithstanding this, this section of the TA considers whether the travel demand from additional school development in the area could be accommodated. In section 3.2 consideration is given to the observed operation of the local road network during peak school travel demand periods. In section 3.3 a hypothetical test is presented to consider the impact of a notional increase from 60 pupils. The resulting implications are considered for pedestrians in section 3.4, for vehicular traffic in section 3.5 and for parking and set down in section 3.6. Overall in section 3.7 it is concluded that the demand generated by an additional 3 classes, even assuming that this demand is all new rather than just redistributed, would have negligible adverse impact on delay and capacity of the local road network.

4.2 Third Party Representations

4.2.1 There were few representations made to the Council. There were 6 objections made from the following addresses: 63 Netherhall Gardens, 14 Arkwright Road, 16A Maresfield Gardens and 65, 71g and 71 Fitzjohn's Avenue. Concerns raised are

summarised in the draft Delegated Officer's Report. Transport related concerns included traffic levels, air quality and car parking.

- 4.2.2 Redington Frognal Association objected to the planning application citing concerns about over development and air quality:

'Pupil numbers were supposed to have been capped at 200, whereas it would appear that the school already has 648 pupils on-site in Fitzjohn's Avenue.'

- 4.2.3 This assertion is simply incorrect; there is no cap on pupil numbers on the Site. As set out in the TA at paragraph 1.1.3 there are currently 228 pupils on the Site and not the 648 pupils alleged by the Association.

The school largely draws pupils from outside the immediate area and the agreed School Travel Plan is not enforced. Instead, pupils are invariably driven to school by car, causing massive air pollution in an area where air pollution levels are already in breach of EU maxima. This causes adverse health effects for the large number of young school children in the area. The high number of car journeys and resultant congestion, directly attributable to Devonshire House, also causes misery for residents in Arkwright Road.'

- 4.2.4 Pupils are not invariably driven to school by car as alleged by the Association. Existing travel patterns are set out in the TA at section 2.3 which shows that less than 1 in 5 pupils are driven to school. As set out in paragraph 2.7.8 the corresponding car trips account for an extremely small proportion of the overall traffic levels in the local area. The Association refers to 'misery for residents in Arkwright Road' but this is not relevant to the application as there will be no tangible traffic change on Arkwright Road.

Redington Frognal Association additionally objects to the over-development which would ensue on this already crowded site. We are of the view that pupil numbers should be capped at 200, as was originally committed to.'

- 4.2.5 There is no existing cap on pupil numbers. As set out in the TA at section 3.7 there is no evidential basis for imposing such a cap.

- 4.2.6 The Church Row and Perrins Walk Neighbourhood Forum objected to the planning application citing concerns about NO₂ levels in the context of policy DP16.

'there are currently 55 schools in NW3 with more than 11,500 pupils of which some 4,500 are at schools on or very close to Arkwright Road and Fitzjohn's Avenue'

4.2.7 Education demand is addressed in the TA at section 2.2. The Site is currently able to meet the care and education of just 1% of the children up to 14 years within 2,000m of the Site (see section 2.2 of the TA).

4.3 **The Council**

4.3.1 A draft Delegated Officers Report was prepared by the Council.

4.3.2 With respect to the transport implications of the proposed development, the officer expresses concerns, reflecting public representations to the application that the increase in development area at the School could over time lead to an increase in pupils which would have a material effect on the local transport network:

1.5 ...Whilst the application does not explicitly state that there would be an increase in numbers, the Council has concerns that an increase in the floor area of this site by 205sqm would over time lead to an increase in pupil numbers. This would have a knock-on effect on the local transport network which is already stretched due to the number of schools in the local area.

4.3.3 There is no supporting information provided to evidence the reported operation of the local road network or the sensitivity to change. Yet to prevent any increase in private motor vehicle trip generation and addition to perceived local traffic congestion, the Council propose that a condition should be imposed on the Site to limit the overall number of pupils to the present School roll at the Site:

1.6 In order to overcome this concern a condition would be imposed on this permission to ensure that the proposed dining hall, kitchen, catering and plant rooms at basement level shall not be used as classrooms for activities commensurate with classrooms and the former classroom in the eaves of the property shall not be used for purposes other than as a special tutoring room and no more than 228 pupils shall be based at the site. This would ensure that the proposal would not result in further private motor vehicle trip generation and addition to local traffic congestions.

4.3.4 By relating the limit of the overall number of pupils to the present School roll at the Site assumes that:

- the existing School is at capacity;
- the road network is at capacity;
- a single extra vehicle would give rise to a severe operational impact on the local transport networks; and,
- pupils who could not be accommodated at the School on the Site would not be educated at any of the other schools within the local area.

4.3.5 In light of the review of the operational impacts of the proposals set out in the TA at section 3 it is clear that even if the School increased demand the implications would be small in the context of the local road network.

1.16 The area is currently under pressure from school run trips generated from an abundance of education centres located within a short distance of this site including, Fitzjohn's Primary School (located 150 metres away), Henderson Court Day Centre (200 metres), University College Senior School (250 metres), St Mary's School (250 Metres), North Bridge House Senior School (200 metres) and The Tavistock Children Day Unit (300 metres). The CPZ is also the most restricted area in the borough with 111 parking permits for every 100 spaces available. The Transport Statement says that no extra pupils proposed on the site as part of this application and thus the development it would not in itself generate any significant vehicular traffic.

4.3.6 As highlighted above, there are a number of schools in the local area. To put this into context according to the most recent available population data (MBR, 2013) there are approximately 55,000 households within 2,000m of the Site. Within these households there are 18,900 children aged between 0 – 14.

4.3.7 There are appropriate restrictions in place to ensure that there is no adverse impact on the local road network from injudicious parking. The proposals will not increase demand for car parking permits within the local area.

1.17 The applicant has advised in email correspondence that there would not be an increase in the number of pupils. However the numbers of pupils has increased over the last 15 years and the increase in floor area by 200sqm would add additional capacity to the school facilities, which has the potential to further expansion elsewhere within the school campus.

1.18 The evidence supplied by the Applicant has indicated that there would be no additional pupils. In order to ensure that the additional 200sqm of new floorspace would over time not be used for additional pupils a condition is imposed which would ensure that the proposed dining hall, kitchen, catering and plant rooms at basement level shall not be used as classrooms for activities commensurate with classrooms and the former classroom in the eaves of the property shall not be used for purposes other than as a special tutoring room and no more than 228 pupils shall be based at the site. This will ensure that the proposal would not result in an increase additional car journeys to and from the site, have implications for the local transport network and the extent of air pollution. Concerns have been raised from local groups about the potential impact of the development on air quality of the area. However, given that there would not in increase in traffic this is not considered to be an issue.

1.19 The proposal does not include any additional cycle parking, as the uplift in space is only 168sqm and there would be no additional pupils. There is currently cycle parking for 10 spaces for pupils at the school. Table 6.3 of the London Plan states that for Long Stay cycle parking there should be 1 space per 8 pupils and 1 space per 8 staff and for short stay 1 space per 100 pupils. Given that the specific school site in which the application relates has 227 pupils and 79 staff the school would be required to provide 29 long stay spaces for pupils, 10 for staff and 3 short stay spaces for visitors. If there is no increase in pupil numbers it is not considered that all 29 spaces would be required however the Applicant has agreed to provide 20 new long stay spaces. These new spaces are considered important in order to achieve sustainable development in this area and cycle spaces would be secured by condition.

4.3.8 There is a very low level of car use for journey to work trips and the School have confirmed that they currently have a policy not to offer parking to any newly appointed staff.

4.3.9 There are currently 31 members of staff who are based on the Site not 79 staff as asserted by the Council. For staff who choose to cycle to work there are places to secure a cycle.

1.20 The proposal involves basement excavation and construction works. These works are likely to increase the number of construction vehicle movements during the overall construction period. The main concern is public safety but we also need to ensure that construction traffic does not create traffic congestion. The current proposal may lead to a variety of amenity issues for the locality such as noise, vibration, air quality. This is of huge importance in what is mainly a residential area. The council would need to ensure that the extensions proposed can be implemented without being detrimental to the amenity or the safe and efficient operation of the highway

network in the local area. The applicant has submitted a draft Construction Management Plan to address these issues however it is recommended that a final construction management plan (CMP) would be secured via a section 106 legal agreement.

4.3.10 A Construction Management Plan has been put forward, as would be required for any development of this nature.

1.21 There is the potential for the proposed works to lead to damage to the footways and carriageways directly adjacent to the main access to the site on Arkwright Road. A financial contribution would need to be secured by way of a section 106 legal agreement in order to repair any damage to the highway.

4.3.11 The draft section 106 legal agreement requires the owner to pay a highways contribution of £18,481.58 to the Council prior to implementation of the proposed development. The Council has to use the contribution towards "carrying out works to the public highway and associated measures in the vicinity of the Property and as are required due to the Development". Currently, the works specifically include the repaving of the footway and two vehicular crossovers adjacent to the Site, and any other works the Council considers necessary as a direct result of the Development. There is a mechanism in the section 106 to deal with any under or over payment, i.e. if the works cost more than £18,481.58 the owner has to pay the excess; if the works cost less, the owner will be refunded the difference.

4.3.12 There are no apparent existing deficiencies in the footway and crossover and no requirement for any enhancement. Any works should be directly related to damage arising from construction activities.

4.3.13 Overall the Council considers that the proposals are acceptable subject to conditions as set out below:

*The Council has considered your application and decided to grant permission subject to the conditions and informatives (if applicable) listed below **AND** subject to the successful conclusion of a Section 106 Legal Agreement.*

4 Before the development commences, details of secure and covered cycle storage area for 20 cycles shall be submitted to and approved by the local planning authority. The approved facility shall thereafter be provided in its entirety prior to the first occupation of the new extension, and permanently retained thereafter.



Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and policy DP17 of the London Borough of Camden Local Development Framework Development Policies.

12 The proposed dining hall, kitchen, catering and plant rooms at basement level and the hall at ground floor shall not be used as classrooms or activities commensurate with classrooms and the former classroom in the eaves of the property shall not be used for purposes other than as a special tutoring room and no more than 228 pupils shall be based at the site.

Reason: To ensure the proposed development would not result in an increase in private vehicle trips which would harm the already congested local transport network. in accordance with policies CS11 (Promoting sustainable and efficient travel) and CS19 (Delivering and monitoring the core strategy) of the London Borough of Camden Local Development Framework Core Strategy; and policies DP16 (The transport implications of development), DP17 (Walking, cycling and public transport) and DP21 (Development connecting to the highway network) of the London Borough of Camden Local Development Framework Development Policies.

4.3.14 As set out in the TA at section 3.7, testing the impact of a notional increase of 60 pupils indicates that it would not give rise to a material impact on the local road network. As such it is concluded that there is no reasonable prospect that the proposed development, which is not expected in itself to give rise to any new demand, to give rise to harm that would warrant the imposition of conditions to restrict education at the School.

5.0 SUMMARY AND CONCLUSIONS

- 5.1 My evidence together with the supporting transport report documentation within TTP Consulting and DTA Transportation reports addresses the question of whether there is a need to introduce a cap on the number of pupils attending the School at the Site.
- 5.2 There are currently 652 pupils on roll at the School overall of which 228 pupils are based on the Site. There are 126 daytime members of staff at the School of which 31 are assigned to the Site. A further 16 daytime staff are not assigned to a specific site e.g. maintenance staff and peripatetic (peri) teachers.
- 5.3 The applications proposals will not change access or parking arrangements for the Site.
- 5.4 The Appellant commissioned TTP Consulting to prepare a Transport Statement to support the application. This document concluded that the proposals would not give rise to a change in the trip generating characteristics of the Site and that the effect of the proposals on the local network was negligible.
- 5.5 The Transport and Highways department of the Council did not raise any issues or present any contrary evidence to the TTP findings.
- 5.6 The application was subsequently considered by officers and the draft officer's report recommended approval subject to conditions and S106 obligations. Notwithstanding the conclusions of TPP, the planning officer deemed it necessary to include measures to mitigate against the perceived travel and traffic implications of the proposed development including a cap on pupil numbers. The imposition of such a condition restricting pupil numbers is not accepted by the Appellant as is set out fully in the Appellant's Statement of Case.
- 5.7 My company, DTA was commissioned in April 2016 to review the transport work previously undertaken and advise the Appellant in terms of the condition that was put forward by the Council imposing a student cap at the Site.
- 5.8 The School's travel characteristics are set out within the School Travel Plan which

has been implemented since the 2007/2008 school year. This illustrates high proportions of children and staff travelling to the Site by non-car modes of travel. Only 17% of children and 6% of staff arrive by car.

5.9 The proposed development is not intended to increase school pupils however the Council are concerned that the proposals offer the potential to result in an increase at some point in the future.

5.10 The operation of the local road network has been reviewed. The key findings were that:

- the School at the Site caters for a relatively small proportion of child education and care within 2,000m of the Site;
- that traffic flow levels on Fitzjohn's Avenue are reasonably consistent across the day and the recorded speeds and volumes do not display profiles consistent with a network characterised by education demand;
- that the performance of Fitzjohn's Avenue traffic movements are largely governed by the operation of the signal junction to the north of the Site and zebra crossing to the south; and
- the set down and collection of pupils has no more than a negligible effect on driver delay or safety overall.

5.11 Overall the policy test requires that conditions imposed on a consent should be necessary, related and proportional. To test the sensitivity of the local road network a scenario was tested whereby 3 classes, equivalent to up to 60 pupils, were added to the local network. It is concluded that such an increase would not lead to any tangible changes from the increase in pedestrian demand, vehicle demand generally or set down demand. Thus the proposed condition to cap the number of pupils at the Site fails to meet the policy test.

5.12 In Summary:

- Without prejudice to the fact that the proposals do not seek additional floorspace

for classrooms sufficient to warrant additional pupil numbers, should pupil numbers increase such increase would be de minimus to the overall estimated number of pupils within 2,000m of the Site and would not cause harm to the transport network.

- Additional children at the Site is unlikely to change education travel patterns in the local area.
- The operation of the local network, in particular the signal junction or zebra crossing, are not sensitive to pupil numbers at the Site.
- Extra drop offs and pick-ups would represent only small percentage increases and would not result in a tangible change in network operation.

SKP/18178-03b HS Transport
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APPENDIX A

DTA Transport Assessment Report



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