

156 West End Lane, West Hampstead, London

Our Ref: 22257/11 - 16/4430 Rev A

Technical Note – November 2016

1.0 EXECUTIVE SUMMARY

1.1 Mewies Engineering Consultants (M-EC) have prepared a technical note to assess the transportation findings and conclusions following a Transport Assessment (TA) prepared by Transport Planning Practice (TPP) relating to the proposals to redevelop 156 West End Lane, West Hampstead, London on behalf of their client A2 Dominion Developments Ltd.

A summary of the key findings is provided below:

1.2 All network traffic count surveys undertaken for the purposes of evaluating the development's impact against baseline traffic conditions were undertaken in the second week of July. The DfT's Guidance on Transport Assessment is very clear as to when traffic count surveys should be undertaken so as to be representative of normal network conditions with paragraph 4.19 stating the following:

'The traffic data should reflect the normal traffic flow conditions on the transport network (e.g. non-school holiday periods, typical weather conditions etc.) in the vicinity of the site, and should be valid for the intended purposes. It should also take account of holiday periods in tourist areas, where peaks could occur in periods that might normally be considered non-neutral. The recommended periods for data collection are spring and autumn, which include the neutral months of April, May, June, September and October as described in DMRB Volume 13, Section 1, Part 4'

1.3 The period that the traffic counts were carried out clearly conflict with this advice, and as such should be regarded as inadmissible as the information will be inaccurate and unrepresentative of normal network conditions. The survey should therefore be redone in a neutral month and the report updated accordingly.

1.4 The turning count survey carried out to assess vehicle movements associated with the existing Travis Perkins operations was also undertaken in July. Travis Perkins have confirmed that July and September are unrepresentative months. The information relating to movements associated with the existing operations is therefore unrepresentative of their normal operations, and any analysis and/or conclusions reached from this information cannot be relied upon. This survey should therefore be redone in a month representative of Travis Perkins normal operations, and the report updated accordingly.

1.5 The report has inaccurately calculated the person trip rates from the extant use. Accordingly any subsequent analysis will also be inaccurate. The report needs to be updated using the corrected figures.

1.6 We are of the view that several important safety issues have not been addressed with the proposed access arrangements. As such there is a risk of personal injury to other roads users and pedestrians.

2.0 INTRODUCTION

- 2.1 The purpose of this TN is to review the planning application submitted on behalf of A2 Dominion Developments Ltd specifically relating to transport and safety matters, and where pertinent highlights discrepancies or alternative views to help inform the Planning Authority in their determination of the application.
- 2.2 The planning application was supported by a Transport Assessment carried out by TPP (Ref 3070/D002C), which also incorporated a framework Travel Plan for the proposed application site.
- 2.3 The report was structured as follows:
- *Section 1*– presented information relating to the proposed development, background of the application site, and discussions to date ;
 - *Section 2*– discusses how the site accords with national, regional and local policies;
 - *Section 3* – presented information relating to the sites context with the surrounding environment and infrastructure, together with the extant uses of the application site, and historic accident data;
 - *Section 4* -presented information covering the proposed development access arrangements, and allocation of parking for the site;
 - *Section 5* - presented information on the likely trip generation of the site compared to the extant uses, and distribution of trips by use of Census Data for the Camden ward;
 - *Section 6* - outlined measures and an approach to developing the Travel Plan and role of the Travel Plan coordinator;
 - *Section 7* – sets out how construction activities will be managed, and;
 - *Section 8* – presented the summary and conclusions from the information and analysis undertaken within the report.
- 2.4 Further comments have since been submitted by TPP in their report dated July 16 in reply to Morgan Tuckers previous observations on the Transport Assessment and findings from their Road Safety Audit. In light of the relevance of this report to the conclusion reached in the TA, we have also provided additional observations on this report.

3.0 BACKGROUND

- 3.1 The proposed site is currently in the ownership of London Borough of Camden who previously occupied the upper floors of the building, though all staff have since been relocated, and the building has remained vacant for some time.
- 3.2 The ground floor is currently occupied by Travis Perkins and Wickes Kitchens and Bathrooms, who operate independent of each other.

4.0 REVIEW OF TRANSPORT PLANNING PRACTICE (TPP) TRANSPORT ASSESSMENT

- 4.1 The current application is supported by a Transport Assessment (TA) prepared by TPP. The purpose of any TA is to review all of the transport implications associated with the site, whether they be already known or anticipated, both positive and negative, and where viable present suitable mitigation in order to make a development acceptable in planning terms.
- 4.2 Observation of the transport findings have been provided under the headings to which they relate.

Introduction

No further comments at this stage.

Policy context

No further comments at this stage.

Existing Conditions

It is noted from paragraph 3.3.8 that having carried out pedestrian flow counts; presented in table 3.1, it was concluded that the period 1800-19:00 recorded the maximum number of movements. However, it can be clearly seen that the period 0800 -0900 recorded the highest level of pedestrian activity 2054, when compared with 1969 for the period 1800 – 1900.

Paragraph 3.6.8 refers to an Automated Traffic Count (ATC) carried out in July 2015 to establish traffic flow and speed data along the B510 West End Lane. It is to be noted that this survey was undertaken outside the recommended periods for data collection as defined in the DfT's document 'Guidance on Transport Assessment, paragraph 4.19' which states the following

'The traffic data should reflect the normal traffic flow conditions on the transport network (e.g. non-school holiday periods, typical weather conditions etc.) in the vicinity of the site, and should be valid for the intended purposes. It should also take account of holiday periods in tourist areas, where peaks could occur in periods that might normally be considered non-neutral. The recommended periods for data collection are spring and autumn, which include the neutral months of April, May, June, September and October as described in DMRB Volume 13, Section 1, Part 4'

As such the data presented does not reflect normal network conditions. Variations associated with school holiday periods will have been reflected in the data.

Proposed Development

It is noted in paragraph 4.4.3 of TPP's report that specific reference is made with regards to the Section 106 agreement. This asserts that any future occupiers of the building would be ineligible for on street parking. It is our understanding that under the Planning Act, any person/s bound by such an obligation can seek to have the obligation modified or discharged after five years. While this would be dependent on the obligation no longer being required or applicable; which is unlikely to be the case in this instance, the statement is in our view slightly misleading.

Trip Generation and Mode Share

Existing

It is noted that in table 2 at paragraph 5.2.6 a possible typing error has resulted in inaccurate person trip generations being presented. Paragraph 5.2.2 has confirmed the vacant former office quantum as 2,401sqm. The information and figures in table 5.2 however reflect a floor area of 2,041sqm and therefore underestimate the person trip rate generated from the extant use. Any subsequent tables / commentary reliant on this information will also be inaccurate, and should be revisited to ensure accuracy of reporting.

Again the turning count survey carried out to examine vehicle movements to and from the Travis Perkins and Wickes premises was undertaken in a non-neutral month (July) and therefore unrepresentative of normal network conditions. Travis Perkins have confirmed that an annual drop in sales typically occurs around this period, which is further evidence that the results of the survey are inaccurate. The survey should be redone in a neutral month.

Paragraph 5.2.14 has incorrectly referenced table 5.5 instead of table 5.4.

It is noted that a discrepancy exists in the recording of pedestrian flows along the eastern footway, as presented in tables 3.1 and 5.16. There is no explanation within the report as to how this discrepancy may have come about. Further information should therefore be undertaken to confirm accuracy of reporting and reliability of information / analysis reliant on these findings.

In summary, we do not consider that the existing trip generations for the existing conditions have been accurately presented sufficient for us to say with confidence that the report is sufficiently robust and representative of normal conditions on the network and operations of Travis Perkins and Wickes premises.

Travel Plan

No further comments at this stage.

Outline Construction and Management Plan

No further comments at this stage

5.0 REVIEW OF ROAD SAFETY

- 5.1 A Stage 1 Road Safety Audit was carried out by RKS Associates in October 2015 the purposes of which was to identify any inherent highway safety issues with the proposed means of vehicular/pedestrian access to the site. Plan 30760/AC/26 was provided for this purpose.
- 5.2 The audit had broadly followed HD19/15 requirements, and the Auditors appear to hold the requisite qualifications and experience to carry out the audit.
- 5.3 A number of safety concerns were identified with the proposals, which have been summarised in the following table, taken directly from the Audit which also includes the Designers Response to the problems and recommendations raised therein.

Item No.	Audit Team Recommendation(s)	Designer's Response
2.1	The Audit Team raises no concerns at this Stage 1 RSA in respect of local alignment.	Noted
3.1	Provide swept path plots to ensure that vehicles can access the disabled car parking bays and loading bay safely.	Please see TPP Drawing 30760/AC/041
4.1	Provide 2m x 2m visibility envelopes where each vehicle access meets the back edge of the footway. Alternatively, install a boundary treatment that facilitates visibility between motorists and pedestrians.	Please see TPP Drawing 30760/AC/041
5.1	The Audit Team raises no concerns at this Stage 1 RSA in respect of road signs, carriageway markings and lighting. However clear signs and road markings should be provided to inform road users of the highway layout.	Noted. This will be addressed via s278 works, should the proposed development be granted planning consent.

[Extract from RSA VRP693-01]

- 5.4 In addition to the above Road Safety Audit, Morgan Tucker also reviewed the proposed access layout in their Road Safety Audit dated January 2016. This identified the following.

Item No.	Audit Team Recommendation(s)	Assessment Response
2.1	The proposed access on the northern edge of the development requires exiting vehicles to cross the opposing side of the carriageway to exit.	This can introduce significant risk of conflict and should be mitigated with a redesign of the access.
2.2	Conflict between emerging cyclists and pedestrians due to widening of cycle path resulting in increased speeds.	Due to the adjacent wall visibility is reduced and should be mitigated with a redesigned arrangement at the intersection of the two paths.
2.3	Lack of pick up / drop off area could introduce congestion or risk of collision with other road users.	A loading facility should be provided to mitigate the risk.

[Extract from Morgan Tuckers Road Safety Audit dated Jan 16]

- 5.5 We have undertaken a further review of safety in light of the revised proposals and layouts post the above Road Safety Audits. The review was conducted by a qualified Road Safety Auditor (Team Leader) and consisted of a desk top appraisal only. The following issues were identified:
- Plan 30760/AC/26 was included for the previous audit review. This illustrated kerbed radii for the access/egress. It would appear that these have been omitted from the current proposals. As such we would raise concerns that overrunning of the adjacent footway could occur increasing the likelihood of conflict with pedestrians. In addition, vehicles on egress will overhang the northbound carriageway potentially resulting in vehicle to vehicle conflict, as well as hindering free flowing conditions.
 - It is unclear from the revised proposals whether vehicles or pedestrians have priority at the proposed access/egress. The previous layout indicated that vehicles would have priority and tactile paving incorporated so as to inform visually impaired users of the layout. It is our view that priority should be assigned to vehicles so as to mitigate instances of pedestrian / vehicle conflict and which mitigates blocking of the carriageway, which could manifest in rear end shunt type collisions occurring. Cyclist travelling down the nearside of any stationary lorry/vehicle increase the danger of left turn type collisions.
- 5.6 In TPP's report dated July 16 they have responded to the safety issue raised in problem 2.1 of the Road Safety Audit carried by Morgan Tucker that of a HGV when heading south from the application site having to cross into the opposing lane and the inherent risks of head on type collisions occurring. TPP concludes in paragraph 31 that this statement is unfounded, the reasons for which are discussed in paragraph 18 – 23. On review we believe that the comments made by Morgan Tucker are justified and should not be considered as misleading. The purposes of a Road Safety Audit is to identify safety issues and offer a possible solution to resolve or mitigate the issues, and where reasonable to do so put forward suggestions that would improve the overall safety of the scheme being promoted.
- 5.7 The justification from TPP centres on there being fewer HGV traffic movements associated with the proposed, and that the situation was already occurring in the existing circumstances citing camera footage of a flatbed truck leaving the existing access, which is inconclusive. While this statement in isolation maybe true, it in no way negates the responsibility of the promoters of a scheme in designing out risks, and in this instance we do not believe that appropriate consideration has been given in the design of the new access.

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