

PLANNING SERVICES

TOWN & COUNTRY PLANNING (DETERMINATION BY INSPECTORS) (INQUIRIES) RULES 2000

STEPHEN BURKE

PROOF OF EVIDENCE FOR PUBLIC INQUIRY COMMENCING ON 15th of September 2020

APPEAL SITE

Former Hampstead Police Station, 26 Rosslyn Hill, London NW3 1PD

APPELLANT

The Department for Education and Anthem Schools Trust

SUBJECT OF APPEAL

 Refusal of planning permission and listed building consent for change of use of the site from a police station (sui generis) to a one-form entry school (Use Class D1) for 210 pupils and business/enterprise space (Class B1) including alterations and extensions to the rear and associated works.

COUNCIL REFERENCE:

2019/2375/P (Planning Application); 2019/2491/L (Listed Building Consent Application) **PLANNING INSPECTORATE REFERENCE:**

APP/X5210/Y/20/3248002 & APP/X5210/W/20/3248002/3248003

PROOF OF EVIDENCE OF STEPHEN BURKE

QUALIFICATIONS

- I have a Bachelor of Engineering (Civil) from Auckland University, New Zealand and an MSc/DIC from the Centre for Transport Studies (Imperial College/ UCL). I am an Associate Member of the Institution of Civil Engineers. I have over 35 years' experience of traffic and transport engineering, working in both the public and private sectors.
- 2. I understand that in providing evidence to the Inquiry my professional duty is to the Inquiry and this duty overrides any obligation to my employers. I confirm that the facts stated are to the best of my knowledge true and accurate, and that the opinions I have expressed represent my professional opinion.

STRUCTURE OF THIS PROOF

- i. My proof will consider the transport issues relating to the appeal of the decision to refuse planning permission, namely Reason for Refusal 1.
- ii. My evidence will be divided into 4 sections:

In Section 1 (Site and Surroundings) I will describe those particular aspects of the site and surrounding highway network relevant to my evidence.

In Section 2 (Assessment of the Proposals) I will assess the merits of the proposed scheme in relation to the reasons for refusal covered by my evidence.

In Section 3 (Summary and conclusions) I will summarise the arguments made in this proof of evidence.

iii Please refer to the proof of evidence of my planning colleague, John Sheehy, for the planning history, planning policy framework, and the details of the appeal applications. Mr Sheehy deals with the planning balance in relation to both appeals and my evidence provides the assessment of transport issues on the proposals to inform that exercise.

1.0 SITE AND SURROUNDINGS

1.1 I set out the features of the site and its surroundings relative to my evidence (transport issues) below.

Local Road Network

- 1.2 The appeal site is located on the corner of Rosslyn Hill and Downshire Hill. There are three categories of road that Camden administers as Highway Authority: London Distributor Road, Local distributor Road and Local Road. Rosslyn Hill is a London Distributor Road, i.e. the highest category. These provide links to the Transport for London Road Network and are for journeys between boroughs and access to town centres, and are part of the main bus routes.
- 1.3 The London Plan refers to "busy roads" in relation to the location of schools but does not appear to define a busy road. That being the case, I address the matter from first principles.
- 1.4 In terms of flows, Rosslyn Hill has an Average Annual Daily Flow of 14,657 vehicles (2018). We do not have many roads with higher flows and I conclude that it should be treated as a busy road.
- 1.5 The Department for Transport classes 'A' Roads as 'Major roads'. (DfT 2019. Road Lengths in Great Britain Statistics: Notes and Definitions). As Rosslyn Hill forms part of the A502, it is also a Major Road.
- 1.6 Downshire Hill is a Local Road and would not be classified as a busy road.
- 1.7 The roads adjoining the site are within Camden Council's controlled parking zone (CPZ) 'CA-H' which operates Monday to Saturday from 8am to 9pm. Within the CPZ, there are 104 permits issued for every 100 spaces available.

The Appeal Site

1.8 The main pedestrian entrance to the site is on Rosslyn Hill and this would be retained. There are also pedestrian entrances on Downshire Hill as well as a vehicular entrance, which currently serves 14 car parking spaces. The car parking spaces would be removed under the proposal but the vehicular entrance would be retained for servicing.

Traffic flows

- 1.9 The area suffers from 'school run' traffic generated from the many schools in the area. The school run traffic coincides with the morning peak of commuter traffic and forms a spike in traffic flows around the time schools finish for the day.
- 1.10 There was a notable drop in traffic flows in the London Borough of Camden subsequent to the COVID-19 lockdown. However, flow data from 14 of the Vehicle Activated Signs (VAS) across the Borough, indicate that the traffic levels are already at 91% of the pre-lockdown average. This is with the schools still mostly suspended or on holiday.

2.0 ASSESSMENT OF THE PROPOSALS

2.1 My evidence is in relation to Reason for Refusal 1. For ease of reference, this reason is as follows:

The proposed development by virtue of its use, location and catchment area is likely to result in an increase in trips by private motor vehicles, increased traffic congestion and exacerbating air pollution and would fail to sufficiently prioritise sustainable modes of transport, contrary to policies T1 (Prioritising, walking, cycling and public transport) and C2 (Community facilities) of the Camden Local Plan 2017 and policies TT1 (Traffic volumes and vehicle size) and TT2 (Pedestrian environment) of the Hampstead Neighbourhood Plan.

Baseline traffic at the appeal site

- 2.2. In terms of the site's transport impact, the appellant's position is that the most recent use, i.e. a police station, should set the baseline of acceptability in terms of traffic generation. We do not accept police use as a valid comparator for reasons, some of which are land use planning points which are explained by Mr Sheehy, some of which are legal points which will be covered by our Counsel, and some of which I explain below.
- 2.3. The police station is understood to have been in a state of decline and disuse from 2000 to its eventual closure in 2013. The Ham & High, 29 April 2012, reported ...when the Metropolitan Police was reorganised, and Hampstead lost its status as a key police station, its force was gradually eroded to the point where staff struggled to man the front desk. Aerial photos in 2008 and 2010 respectively show 4 and 1 parked vehicles. The freehold of the site was purchased by the Department for Education on 5th June 2014.
- 2.4 In these circumstances, the previous traffic generation either immediately prior to closure, as at 2008, is of academic historic interest only. Any new use would need to be acceptable in transport terms. Policies for other land uses, such as

residential or office uses in this location require development proposals to be vehicle free, except for disabled provision and servicing. Commuting journeys by car would be close to zero. Servicing journeys would be light and distributed throughout the day. The site would generate much less traffic than the historical use as a police station.

- 2.5. Notwithstanding the Council's disagreement on the adoption of police use as a valid baseline, I have further criticisms of the methodology used to derive the trip generation that would occur even if the appeal site were to be brought back into use as a police station, as set out below.
- 2.6. In '*Highways Technical Note to Camden Council Sept 2019*', the appellant sought to establish the trips that would have been generated by the former Hampstead Police Station and the magistrates' court when it was fully operational. The TRAVL (Trip Rate Assessment Valid for London) and TRICS (Trip Rate Information Computer System) traffic databases are the industry standard systems for trip generation analysis. Both the TRAVL and TRICS databases were interrogated but there was no data available in either database for these specific land use classes.
- 2.7. The appellant chose to establish the trip rate by carrying out a survey of the Kentish Town Police Station on 11 September 2019. The survey comprised of a manual count of all arrivals and departures by time and by mode at the station from 0700-1900. In summary, the total number of two-way car journeys (arrivals + departures) was 168 over the 12-hour period.
- 2.8. The appellant claimed that the trip generation derived from Kentish Town Police Station could be used as an estimate of the potential trip generation at the Former Hampstead Police Station because the two police stations were of a similar size and were therefore comparable. I disagree with this assumption because the two police stations differ in terms of floor space, parking capacity and observed numbers of vehicles parked.

2.9. The appellant assumed the Kentish Town Police Station measured approximately 2,415m² GIA and former Hampstead Police Station building measured approximately 2,240m² GIA. However, the area calculation for Kentish Town Police Station omitted the 8-storey Section House at the rear of the site, which measures approximately 6,340m² GIA. As to the use of the Section House, the following question was put to the GLA in 2017:

For many years the Police Section House behind the Police Station in Holmes Road NW5 3AE has stood empty. At a time of desperate housing shortage, it seems strange that it is not in use. Is the building part of the police or GLA estate, and if so will you consider developing the building into keyworker housing? Answer for Kentish Town Section House Answered By: The Mayor Date: Tuesday, 17th October 2017 The building known as Section House building at Holmes Road NW5 is used as operational accommodation (offices etc.) by the Metropolitan Police Service as an extension to Kentish Town Police Station and is not vacant or available for other uses at the present time.

- 2.10. The Section House is evidently not vacant although it is not clear whether it is fully utilised. If its entire floorspace is included as part of the police station, the total would be approximately 8,840m² GIA.
- 2.11. Kentish Town Police Station has a large parking capacity in three main areas: Regis Road car park (38 spaces), Holmes Road frontage (8 spaces), and the Section House car park (15 spaces); totalling 61 spaces. A 2018 aerial photo of Kentish Town Police Station is shown in Figure 1 below. The Regis Road car park is shaded yellow, the Holmes Road frontage is shaded green, and the Section House car park is shaded red. The Section House building is also indicated. The survey of Kentish Town police station omitted the Section House car park. I consider Section House parking should be included, as there is no evidence to suggest employees at Kentish Town police station are assigned parking spaces on the basis of the building in which they are based. However,

I have considered below options with both the Section House parking included and omitted.



Figure 1: Kentish Town Police Station 2018

- 2.12.
- 2.13. In contrast to Kentish Town Police Station, the appeal site has the capacity for 14 off-street car parking spaces. The lack of parking at the former Hampstead Police Station would place a ceiling on the number of vehicles that could use or be based at the site. Further, the area calculation for the former Hampstead Police Station building (2240m² GIA) included the magistrates' court (214m² GIA). Traffic generation for the magistrate's court element is likely to have been minimal. Defendants, witnesses, probation staff and lawyers etc. would have been expected to travel by public transport. There would likely have been up to three dedicated parking spaces for the magistrates, which would have accounted for up to 6 2-way journeys per day which would further reduce the capacity for parking. The magistrate's court accounted for 10% of the floorspace but probably would have had less than half the trip generation per 100m².

2.14. To assess the level of parking at the two police stations, I also compared aerial photos from Google Earth. Clear photos could be obtained for the years 1999, 2003, 2006 and 2008. Note that after 2008, the level of parking at Hampstead was at, or close to zero. The historical aerial photos of Kentish Town Police Station are shown in Figure 2 below.

Figure2: Historical aerial photos of Kentish Town Police Station



1999

2003



2.15. The historical parking counts are shown in Table 1 below, which shows the levels of parking during a period that both police stations were operational.

Year	Hampstead	Kentish Town
1999	9	61
2003	12	54

Table 1: Vehicles parked at Hampstead and Kentish Town police stations

2006	18	41
2008	4	44
Average	11	50

2.16. It is clear that some form of correction would need to be applied to the traffic generation at the Kentish Town police station if it is to be used as a proxy for the Hampstead Police Station, be it based on floorspace, parking capacity or the observed level of parking. The ratios are shown in table 2 below.

Table 2: comparison of Hampstead and Kentish Town police stations

	Hampstead	Kentish Town	ratio
Floorspace	2240*	8840**	25.3%
Parking spaces	14	61**	23.0%
Parking Spaces	14	46***	30.4%
Parked vehicles	11	50	22.0%

Note * includes the magistrate's court

** includes the Section House

*** not including the Section House

- 2.17. I consider the quantity of parking to be the most significant feature influencing traffic generation as it applies a physical constraint on the number of vehicles that use and operate from the site. Accordingly, the traffic flows derived from the Kentish Town Police Station Survey should be factored by 23% if including Section House parking spaces or 30.4% if excluding these spaces, to take account of the lack of parking at Hampstead Police station.
- 2.18. The appellant's survey of vehicle arrivals and departures at Kentish Town Police Station is shown in Table 3 below.

	Vehicles		
Survey Time	Arrive	Depart	
07:00-07:30	1	8	
07:30-08:00	1	6	

Table 3: Kentish 1	Town Police	Station	Survey
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08:00-08:30	0	4
08:30-09:00	1	0
09:00-09:30	2	3
09:30-10:00	8	3
10:00-10:30	4	7
10:30-11:00	7	4
11:00-11:30	1	3
11:30-12:00	2	5
12:00-12:30	3	0
12:30-13:00	4	3
13:00-13:30	6	4
13:30-14:00	6	0
14:00-14:30	4	2
14:30-15:00	5	7
15:00-15:30	7	5
15:30-16:00	3	0
16:00-16:30	15	0
16:30-17:00	2	0
17:00-17:30	4	5
17:30-18:00	2	4
18:00-18:30	0	3
18:30-19:00	2	2
Total	90	78
Total 2-Wav	168	

- 2.19. Applying the correction factor of 23%, mentioned above, to the Kentish Town Police Station figures would give a 2-way total of **39** vehicle movements. Applying the correction factor of 30.4%, mentioned above, to the Kentish Town Police Station figures would give a 2-way total of **51** vehicle movements.
- 2.20. The Rule 6 Group commissioned a further survey of West Hampstead Police Station and this was executed on 30 July 2020. West Hampstead Police Station has a floorspace of approximately 1800m² GIA so it is of a similar size than the former Hampstead Police Station. However, it is of a much more modern design and its space would be used more efficiently. The parking provision can be divided into four areas: Fortune Green Road frontage, the southwest boundary, the rear central area (behind the Fortune Green Road frontage), and the designated Police parking area on Hillfield Road. The latter is 27m in length, which would equate to five bays. It should be noted that counts of vehicles using

the Hillfield Road bays were not included in the survey. Reference to historical aerial photos indicates the capacity to be as shown in Table 4 below.

Table 4: Parking spaces at West Hampstead Police Station

	Parking spaces
Fortune Green Road frontage	11
Southwest boundary	7
Rear central area	Up to 14

- 2.21. My assessment of the parking capacity of West Hampstead Police Station, excluding the on-street bays, is therefore 32 spaces.
- 2.22. The 12-hour (0700 1900) traffic survey of West Hampstead Police Station showed (in summary):
 Total vehicles in 52
 Total vehicles out 64
 Total 2-way movements 116
- 2.23. Applying a correction on the movements at of West Hampstead Police Station to estimate the potential movements at Hampstead Police Station (14 spaces divided by 32 spaces = 44%) gives **51** 2-way vehicle movements.

Car borne journeys to the Abacus school

- 2.24. The appellant's document *Highways Technical Note September 2019* (HTN) states that the school will aim to generate zero vehicle trips during the 'school run' from the outset of first occupation at the new premises. I consider this to be an unrealistic assumption as will be explained in the following paragraphs.
- 2.25. At its existing location at Camley Street, the Abacus school operates a coach and mini-bus service which transports its pupils and some staff from the catchment area to the current temporary accommodation. The submitted Transport Assessment states at paragraph 4.26 that over 90% of parents use the private bus service put on by the school and of the remainder, 2% of pupils are dropped off by private car. The HTN later quoted a 'hands-up' travel mode

survey to show how children are dropped off at the private bus stop pick-up points within the catchment area. The survey information showed 4% were dropped off by car. Presumably, 2% of pupils still travelled all the way to the school by car, meaning that a total of 6% travelled part, or all the way, by car.

2.26. As mentioned, the school currently operates a coach and mini-bus service for pupils and staff. There are two collection points with one on Haverstock Hill opposite the junction with Parkhill Road (NW3 4RR) and another close to Swiss Cottage Leisure Centre (NW3 3NF). The Transport Statement (2015) for the Camley Street application spoke of the need to expand the existing coach capacity (2 buses with 49 seats and a minibus with 12 seats) to cater for growth that was planned at the time. We would expect current coach activity to be at least that quoted in the preceding sentence. The coach and mini-bus service would be withdrawn if the school moves to the Rosslyn Hill site. Pupils would have to find other ways of getting to and from the school. Routes by sustainable modes such as walking, cycling and scooting, will be longer and it is my opinion that some of those that walked to the local pickup points would in future be taken by car.

Gradients

2.27. The catchment suffers from high gradients, which are an impediment to walking and cycling. Guidance on gradients is given in DfT. (2007). *Manual for Streets.* Two clauses are quoted below.

6.3.27 Designers should attempt to keep pedestrian (and cycle) routes as near to level as possible along their length and width, within the constraints of the site. Longitudinal gradients should ideally be no more than 5%, although topography or other circumstances may make this difficult to achieve.

6.4.11 The headroom over routes used by cyclists should normally be 2.7 m (minimum 2.4 m). The maximum gradients should generally be no more than 3%, or 5% maximum over a distance of 100 m or less, and 7% maximum over

a distance of 30 m or less. However, topography may dictate the gradients, particularly if the route is in the carriageway.

- 2.28. Whilst Clause 6.4.11 is aimed specifically at cycling, it explains the importance of considering not only maximum gradient, but also the distance over which it applies
- 2.29. At 90m AOD, the application site has a higher altitude than all the streets in the given catchment (with the possible exception of Lyndhurst Road). Most journeys to the site will therefore be up hill. A contour map of the area is shown in Figure 3 below.



Figure 3: Hampstead catchment contour map

2.30. Figure 4 below shows a map and section of a walking route to the application site, starting from the southeast corner of the catchment area, near Chalk Farm tube station, 1.09 miles from the appeal site. The average gradient of the route is 3%, it peaks at about 7%, and about 200m of the route has a gradient higher than 5%, which is the *Manual for Streets* recommended maximum for walking.

The contour map suggests there are similar gradients throughout much of the catchment.



Figure 4: Plan and gradient of route to site to SE corner of catchment

- 2.31. What is probably more important than the peak gradient is the total length of continuous incline: 1.09 Miles (1754 Metres) and total climb: 167 Feet (51 Metres). This would act as a deterrent to walking as will be discussed below.
- 2.32. Gradient slows down walking speed. One way of estimating the relationship between walking speed and gradient is by applying Tobler's Hiking Function, an exponential function based on empirical evidence. A list of values is shown in the Table 5 below.

Table 5: Walking speed vs gradient

Gradient	Reduction in speed	Walking speed KPH
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0%	0%	4.8
1%	3%	4.6
2%	7%	4.5
3%	10%	4.3
4%	13%	4.2
5%	16%	4.0
6%	19%	3.9
7%	22%	3.8
8%	24%	3.6
9%	27%	3.5
10%	30%	3.4

- 2.33. We can calculate the walking time from the edge of the catchment area, at Chalk Farm tube station, to the appeal site using the corrected walking speed for a 3% gradient i.e. 4.3 KPH. The walking time for an adult would be 24.5 minutes. The quoted walking speeds are for adults; it is my opinion that the walking speeds for young children or adults with young children would be less.
- 2.34. The effect of gradient on mode share was examined in the paper: Transportation Research Procedia 27 (2017) *The influence of slope on walking activity and the pedestrian modal share.* This is available at: <u>www.sciencedirect.com</u> and is attached at Appendix SB1. The results of the research showed a significant influence of slope on walking attractiveness and suggested that a 1% increase in slope makes walking roughly 10% less attractive. The walking distance in the study was 800m, i.e. similar to the typical walking distance in the appeal site catchment.
- 2.35. With average gradients of around 3%, this is relevant to the case. The study assumes there is an alternative to walking available. Within the school catchment, buses are an option for those that live close to a route that passes the appeal site. For the rest, car travel is the first alternative. It is clear that the gradients will influence modal choice and increase the likelihood of pupils travelling by car.

2.36. Suggested acceptable walking distances are given in IHT. (2000) *Providing for journeys on foot*, as shown in Table 6 below.

Table 6: Providing for journeys on foot – Suggested acceptable walking distances.

	Commuting/School Sight-seeing (m)
Desirable	500
Acceptable	1000
Preferred maximum	2000

- 2.37. At 1754m, the distance from the appeal site to the edge of the catchment is beyond the Desirable and Acceptable distances recommended in the above table. It is approaching the preferred maximum in Table 5. The added effect of the steep gradients in the catchment area would, in my opinion, put it beyond the preferred maximum.
- 2.38. In summary, the route from Chalk Farm Road tube station has an average gradient 3%, with peaks of up to 7%. In that respect it is typical of routes to the appeal site. Uphill gradients slow walking speed and increase journey time. There is evidence to show they influence walking attractiveness and stimulate a shift to other modes. This is likely to affect the proportion of pupils that would arrive at the appeal site by car.

Mode share comparison with other schools

2.39. To get a measure of the expected car mode share of the appeal site, I have examined two other nearby schools in Hampstead: Christ Church Hampstead and New End Hampstead. Both are non-private schools, which tend to have a lower car mode share than public schools. Like the appeal site, they are surrounded by hilly terrain. Their locations are plotted in Figure 5 below.

Figure 5: Hampstead contour plan



2.40. It is known that mode of travel to school is influenced by travel distance; the higher the travel distance, the higher the proportion of those traveling by car. To validate the comparison, it was necessary to determine the catchment sizes of all three schools. This was done using the Locrating.com website. The site calculates the distances of pupils from their school, using statistical data from the Office for National Statistics. For each school it then derives radii that contain proportions of the school's pupil population: 70%, 80%, 90% & 100%. The results are shown in Figure 6 below. Larger versions of the maps in Figure 6 are available in Appendix SB2.

Figure 6: Catchment sizes; Christ Church, New End and Abacus primary schools

The bar charts below show the radii that	The maps below give a diagramatic indictation
contain proportions of the school's pupil	of the catchment radii: 70%, 80%, 90% &
population:	100%
Green 70%	
Yellow 80%	
Pink 90%	
Blue 100%	



- 2.41. The Locrating.com website recommends that the 70% band (coloured green) gives the best indication of catchment size. It can be seen from the bar charts and the maps that Christ Church, New End have catchment sizes significantly smaller than Abacus (Camley Street) and whilst the Abacus catchment might shrink if it were to relocate, it is unlikely to end up smaller than those of the other two schools.
- 2.42. All the schools are registered with TfL STARS scheme, which promotes sustainable travel to schools. Christ Church and Abacus School are silver accredited and New End is gold accredited on STARS. The STARS website states that gold and silver accredited schools can see up to 12% reduction in car use.

2.43. The STARS website has data on the mode of travel to its registered schools; the data is compiled from regular 'hands up' surveys. Data was obtained from the STARS website on Christ Church and New End schools and is summarised in Table 7 below.

	Whole school (pupils and staff) hands-up survey			
	Christ Church Hampstead		New End Hampstead	
Pupils	211	217	337	427
	2018/19	2017/18	May 2019	January 2018
	07/05/2019	21/05/2018	30/04/2019	29/01/2018
Car	25%	31%	22%	22%
	15%	24%	19%	20%
Car/motorcycle				
Car share	8%	3%	0%	2%
Park and	2%	4%	2%	0%
stride				
Total – car	17%	28%	22%	20%
share				

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Note: the above figures, compiled by TfL, were copied from the STARS website. The figures were displayed to the nearest percentage point and summations may not tally due to rounding errors.

- 2.44. The bottom row of the above table is the total arriving by car less those who arrived by car share. This is to avoid double counting pupils that arrive in a car that has already been recorded. The average of the bottom row is **22%**. I would consider a 22% arrival by car to be a realistic estimate of the mode share at the appeal site.
- 2.45. With 210 pupils at the school, the trip generation would equate to 46 arrivals and 46 departures, twice a day; giving 184 2-way movements. Servicing demand would probably be light, at about one visit per day. The total expected

number of 2-way movements would therefore be 186. Estimated 12-hour flows for the police station were derived in paragraph 2.19 as being 39 or 51 2-way vehicle movements, depending on assumptions regarding the Section House at Kentish Town Police Station. The expected flows at the school are therefore approximately **4** times the corrected 12-hour estimate for a police station operating at the site (which as we have noted was the historic use, but which, we know, has not operated since at least 2013 and was in decline for a number of years prior to that).

- 2.46. More importantly, the traffic generated by a police station would be evenly spread over a 12-hour day whereas the school traffic would be governed by the school's start and finish times, occurring mostly in the periods 0830-9000 and 1500-1530. As noted in the Local Plan, Hampstead and Belsize Park have a very high concentration of schools where significant issues exist concerning the 'school run'.
- 2.47. The school run would coincide with, and exacerbate, the existing traffic peaks in the area. This is illustrated in Figure 7 below, which shows northbound traffic flows on Rosslyn Hill taken on typical weekdays during 2018 and 2019. In the morning period, the traffic peaks around 8:15am. There are two peaks in the late afternoon period, occurring around 3pm and 17.15pm. The latter of these is due to commuter traffic. The 3pm spike is understood to be a direct result the pm school run.



Figure 7: Northbound traffic profile - Rosslyn Hill

Parking Stress

2.48. Council records show that the Hampstead (CA-H) Zone has more permits than spaces. The proposal would remove 7 residents' bays in Rosslyn Hill for the installation of a School Keep Clear zone and a disabled bay. The submitted Transport Assessment contained parking stress surveys that showed there was a total of around 45 spare bays (residents' plus pay by phone) in Rosslyn Hill and Downshire Hill at the time of school opening. It should be pointed out that these figures are calculated from the amount of vehicles per length of kerb and do not necessarily equate to individual bays that are available for parking. The 46 vehicles expected to travel to the school each day are likely to struggle to find an appropriate place to stop near the school and this could lead to illegal and double parking around the site with consequential negative impacts on traffic congestion, reduced air quality and road safety.

3.0 SUMMARY AND CONCLUSION

- 3.1. Reason for Refusal 1 stated, inter alia, that the development is likely to result in an increase in trips by private motor vehicles and hence an increase in traffic congestion. The application for a school on the site of the former Hampstead Police Station was proposed on the basis that the traffic generation for the school would be no more than that of the site when the police station was operational. We do not accept the validity of setting the baseline level of traffic generation on the historical police station use when there is no evidence to suggest the police station could be brought back into use.
- 3.2. Notwithstanding the above, we do not accept the appellant's methodology for assessing the previous trip generation at the site; it was based on the much busier Kentish Town Police Station, which has around four times the amount of off-street parking.
- 3.3. The appellant has not presented a convincing assessment of the number of car born journeys that would be generated at the site. Reference is made to 'hands up' surveys that indicate 6% of pupils will arrive by car and there is a stated aspiration to reduce that to 0%. Two annual surveys at each of two similar schools in Hampstead showed that arrival by car was, on average, 22% and we consider this to be a realistic estimate.
- 3.4. Applying appropriate corrections to the former Hampstead Police Station baseline and to the expected percentage of car borne arrivals shows that the traffic generated at the school would be four times that of the site when it operated as a police station (which as we have noted was the historic use but which has not operated since at least 2013 and was in decline for a number of years prior to that).
- 3.5. There are other unquantified factors that indicate the proportion of car borne journeys would be higher than the appellant's estimate (which was based on the school at its current location near Kings Cross). Firstly, the proposed site is at the top of a catchment where gradients often exceed 5% and there is

evidence to suggest that gradients will reduce the attractiveness of walking as a means of travel. Secondly, the coaches which currently take pupils to the school from collection points, within the catchment, will be withdrawn. It cannot be assumed that the pupils will all walk.

3.6. The vehicles expected to travel to the school each day are likely to struggle to find an appropriate place to stop near the school and this could lead to illegal and double parking around the site with consequential negative impacts on traffic congestion, reduced air quality and road safety.

4.0 APPENDICES

Appendix SB1	Transportation Research Procedia 27 (2017) The influence of slope on walking activity and the pedestrian modal share.
Appendix SB2	School catchment plots from Locrator.com

Appendix SB2: School catchment plots from Locrator.com

The plots below are intended to give an approximate visual indication of the schools' catchment sizes; 70% the pupils reside within the green circles and 80% reside within the yellow circles. So for example, the radius of the 70% group is determined by the pupil in that group that lives the furthest distance away from the school.



Christ Church Primary School catchment map from Locrator.com

New End Primary School catchment map from Locrator.com



