Camden
ENVIRONMENT

PLANNING SERVICES

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

REBUTTAL EVIDENCE OF STEPHEN BURKE

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

REBUTTAL

1.0 Introduction

1.1 This rebuttal provides a review of the Proof of Evidence of Nicholas Ferguson for the Public Inquiry in relation to the Former Hampstead Police Station.

1.2 The rebuttal is set out under the following headings:

i). School ‘Hands Up’ Surveys;
ii). Assumption on Rosslyn Hill (A502) Traffic Growth;
iii). Effect of COVID-19 on traffic flows.

1.3 Where I refer to paragraph numbers, unless otherwise stated, these are references to the paragraph numbers in the proof of Evidence of Nicholas Ferguson.

2.0 School ‘Hands Up’ Surveys

2.1 Paragraph 6.10 states that, based on ‘hands-up’ travel mode data from the school’s time at the Haverstock Hill site (2013-2015), a short distance to the south of the appeal site, only 5% of children were dropped-off to school by car. This data was based on one 'Hands-Up' Survey dated December 2014. The school opened in September 2013 and expanded at the rate of 1FE per year. Each new intake would have been 30 pupils. Few details of the survey have been submitted but it seems there would have been 60 pupils at the school in December 2014. This is a relatively small sample. It therefore carries less weight than a sample of the whole school and should be treated with due caution.

2.2 I have consulted the TfL’s STARS website and note that the September 2019 ‘hands up’ survey had not been entered into the school accreditation database.

2.3 Two other pupil 'hands up' surveys were entered into the STARS database and I would query why these were not used by the Appellant. The results of the STARS surveys for the ABACUS school are summarised below.

School name	Survey Date	Actual number of responses	Walking	Scooting	Cycling	Rail/Overground	Tube	Tram	Public Bus	School Bus/taxi	Car/motorbike	Park and stride	% by car
Abacus	19/02/2018	110	8	2	0	0	2	0	5	90	3	0	**3**
Abacus	12/06/2019	164	24	6	3	2	5	5	0	109	9	1	**6**

Note: car-share and buggy modes were zero for both years and have been omitted from the table.

I note that the 2019 survey shows that 6% of pupils arrived by a car mode. I also note that 5 of those surveyed purported to travel by tram, which is unlikely since the nearest tram is in Croydon. This raises questions on the credibility of 'hands up' surveys.

2.4 Paragraph 6.18 gives examples of schools achieving a low % car drop-off. The relevant table is reproduced below:

SCHOOL	POST CODE	PTAL	CPZ	% Car Drop-Off
Christopher Hatton Primary School	EC1R 4PQ	6b	CA-D	0-5%
Holy Trinity & St Silas CofE Primary School	NW1 8DG	6a	CA-F	0-5%
Kings Cross Academy	N1C 4BT	6b	Restricted Area	0-5%
St Mary & St Pancras CofE Primary School	NW1 1QP	6b	CA-G	0-5%
Torriano Primary School	NW5 2SJ	4	CA-M	0-5%

2.5 The above schools are examined in light of the STARS data in the table below.

School name	Survey Date	Actual number of responses	Car/ motorbike	Car share	Park and stride	% by car
Christopher Hatton Primary School	05/06/2017	217	6	0	0	3%
Christopher Hatton Primary School	04/07/2018	222	3	0	0	1%
Christopher Hatton Primary School	17/05/2019	233	1	0	0	0%
Holy Trinity and Saint Silas CofE Primary School	27/06/2018	193	12	0	0	6%
Holy Trinity and Saint Silas CofE Primary School	26/06/2019	210	10	0	0	5%
Kings Cross Academy	20/04/2017	144	4	0	0	3%
Kings Cross Academy	24/05/2018	210	1	0	0	0%
Kings Cross Academy	03/07/2019	266	5	0	0	2%
St Mary and St Pancras CofE Primary School	12/06/2017	203	19	6	0	9%
St Mary and St Pancras CofE Primary School	23/01/2018	206	18	0	1	9%
St Mary and St Pancras CofE Primary School	08/01/2019	222	11	1	0	5%
Torriano Primary School	05/05/2017	442	30	0	0	7%
Torriano Primary School	19/06/2018	388	34	0	0	9%
Torriano Primary School	07/06/2019	352	14	7	0	4%

					Average	**5%**

The first point I note is that the average % drop-off by car is 5%, not 0 – 5%. Further, these schools are at the bottom end of the % drop-off by car spectrum and not representative of the schools in the Borough. They are all more centrally located than the appeal site. The school with the lowest average % drop-off by car is in the Congestion Charge Zone and this would have had a significant impact on the proportion of parents driving their children to school.

2.6 I have downloaded from the TfL STARS website a spreadsheet that contains data from all the Camden primary schools on the STARS database during the academic years: 2016-17, 2017-18 & 2018-19. Some schools were surveyed on all three years, others on two and others on just one of the years. The average mode share by car across all the schools is 17%. I have attached a copy of the database at Appendix A.

3.0 Assumption on Rosslyn Hill (A502) Traffic Growth

3.1 Paragraph 6.65 of the Appellant's Transport proof of evidence and paragraphs 0.12 and 0.13 of the executive summary refer to a drop in traffic flows on the A502 between 2008 and 2018. This corresponds with data from other sources, such as the National Travel Survey, which have shown a reduction in car use for personal travel. The reasons are not fully understood but some reasons that have been put forward include:

- There is a significant decline in driving amongst younger males in particular, but to a lesser degree younger women, possibly because of insurance costs.
- A trend to later childbearing has led to a postponement of car ownership in some cohorts.
- Adolescence is extended through longer education and people staying at home later.

3.2 Whilst there has been an overall reduction in car use, it is probably due to both a reduction in those that become drivers and for others, a delay in the time of life that they take up driving. The latter would produce a downward blip, followed by a growth in car use.

3.3 The DfT produces the National Trip End Model (NTEM)[1] which forecasts the growth in trip origin-destinations up to 2051 for use in transport modelling. The forecasts consider national projections of:

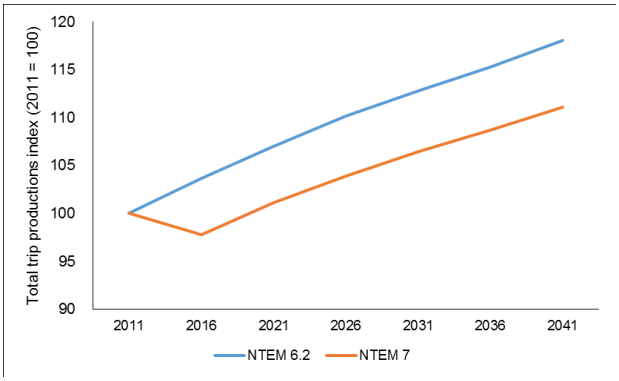
- population
- employment
- housing
- car ownership
- trip rates

3.4 The DfT also makes available TEMPro software, which calculates future trip rates from the DfT's datasets. TEMPro is fully calibrated with each census and undergoes a partial calibration at the midpoint between census years. This involves an update on known data such as employment, housing, car ownership and trip rates plus an estimate of population change.

3.5 TEMPro is a long-term forecasting tool and produces trip rates for each five-year period after census years. The growth rate is assumed to be constant for each five-year period.

3.6 The latest edition of TEMPro is Version 7.2, which underwent a significant revision in the trip rate forecasting methodology in 2016.

[1] Department for Transport 2016 *NTEM Planning Data Version 7,* available at: http://assets.dft.gov.uk.s3.amazonaws.com/tempro/version7/guidance/ntem-planning-data-guidance.pdf



The diagram to the left, taken DfT document: NTEM Planning Data Version 7, shows the effect of the recalibration on traffic growth at a national level.

TEMPro assessment for the annual change in trips for car driver mode, inner London

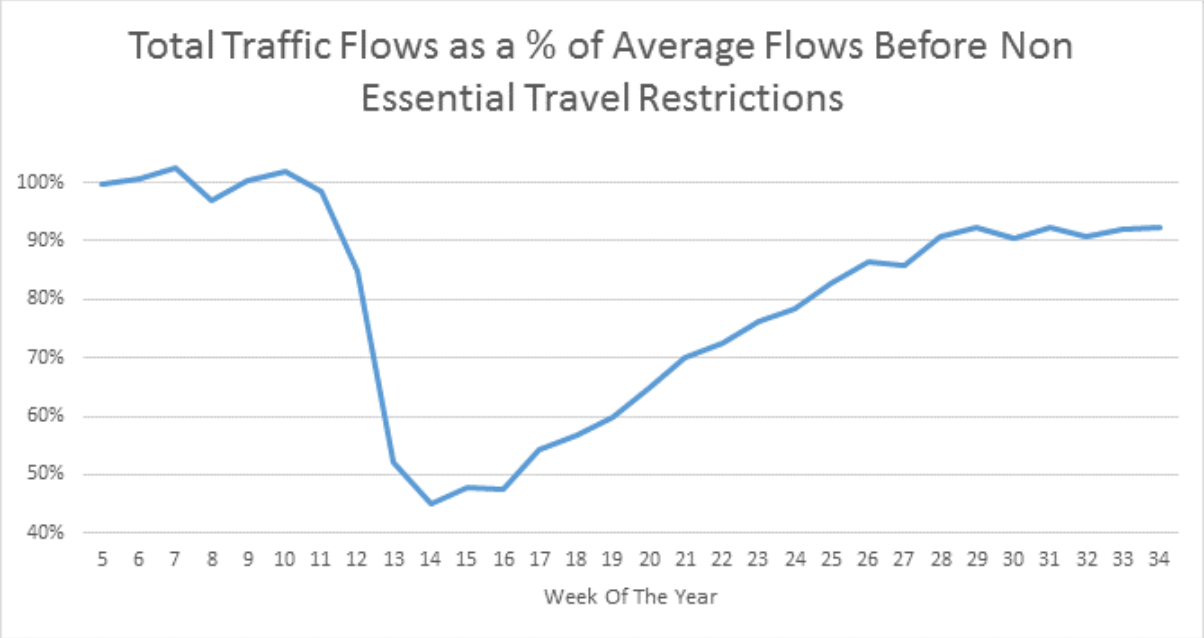
	Forecast period	
	2021 – 2026	2026 - 2031
Average Weekday	+1.0%	+0.9%
Weekday AM peak period (0700 - 0959)	+0.9%	+0.8%
Weekday PM peak period (1600 - 1859)	+0.9%	+0.9%

3.7 The above table, in summary, shows that TEMPro predicts a long-term growth in car trips of around +0.9% per year in inner London. This contradicts the Appellant's assumption that traffic will fall by 1.6% per year, which was based simply on a forward projection of a recent trend. In my opinion, the recent downward trend of traffic on the A502 cannot be assumed to continue and it may actually increase.

4.0 Effect of COVID-19 on traffic flows

4.1 Paragraphs 6.67 – 6.69 refer to conditions post COVID-19 and Paragraph 6.68 refers to Department for Transport data that showed car trips in Great Britain were 80% of normal during lockdown.

4.2 During lockdown, Camden has been collecting flow data from 14 Vehicle Activated Signs (VAS) across the Borough. A plot of the average flows recorded from the VASs is shown below.



4.3 The latest data available is from 16 August 2020, at which time average traffic flows were 91% of pre lockdown levels. The nearest VAS to the site is located on the A502 Haverstock Hill and the flows at this point were also 91% of pre lockdown levels on 16 August. At that date, the schools were mostly suspended or on holiday and not everyone was back at work. Whilst we do not yet have data for the period since the schools reopened, we are not expecting to see a reduction in traffic flows. In my opinion, we cannot assume there will be a long-term reduction in traffic flows near the appeal site due to COVID-19.