



## HIGHWAYS TECHNICAL NOTE

|          |   |
|----------|---|
| Author:  | Paul Mew Associates   |
| Date:    | September 2019  |
| Project: | Former Hampstead Police Station 26 Rossllyn Hill London NW3 1PD           |
| Subject: | Response to Camden Council's Highways Officer – Planning Ref: 2019/2375/P |

### 1.0 INTRODUCTION

1.1 Paul Mew Associates (PMA) is instructed by the Department for Education (DfE) on behalf of the CfBT Schools Trust in relation to the proposed development at the Former Hampstead Police Station, 26 Rossllyn Hill, London, NW3 1PD. The local planning and highway authority is the London Borough of Camden.

#### Planning Application Details

1.2 The site is the Former Hampstead Police Station. The site occupies the corner plot of the (A502) Rossllyn Hill junction with Downshire Hill. The site currently comprises of 2,189 sqm gross internal area (GIA) in sui generis use.

1.3 The main pedestrian entrance to the site is to the front on Rossllyn Hill. There are three separate pedestrian entrances on Downshire Hill plus a vehicle access which provides access to 14 off-street car parking spaces at the rear of the site.

1.4 The roads adjoining the site are within Camden Council's controlled parking zone (CPZ) 'CA-H' which operates Monday to Saturday from 9am to 8pm. The site has a public transport accessibility level (PTAL) score of 4 which is a 'good' rating as defined by Transport for London (TfL).

- I.5 A planning application has been submitted to Camden Council for the proposed change of use of the Former Hampstead Police Station (which is Grade II listed) to permanently relocate an existing established one form entry (FE) primary school, Abacus Belsize Primary School, from its current (temporary) site under D1 of the land use class order. A description of the development is set out as follows:

*“Application Details*

*Application Number* 2019/2375/P

*Site Address* Former Hampstead Police Station 26 Rosslyn Hill London NW3  
IPD

*Application Type* Full Planning Permission

*Development Type* Commercial Change of Use

*Proposal* 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.”

- I.6 PMA produced a Transport Assessment (TA), a Servicing and Refuse Strategy/Management Plan, a School Travel Plan Statement, and a Construction Management Plan which has been submitted with the planning application.

- I.7 In response to the planning application the Council's Highways Officer has made the following comments on the planning application:

*“Transport officers met this afternoon, and agreed that regardless of the previous pre-app comments, the applicant (or there transport consultant) has not demonstrated the number of traffic movements will not increase.*

*Policy C2 of the Local Plan (para 4.33) states “Hampstead and Belsize Park have a very high concentration of schools where significant issues exist concerning the ‘school run’. We will refuse applications for new schools or the expansion of existing schools in these areas, unless it can be demonstrated the number of traffic movements will not increase.”*

*The TA doesn't quantify or provide any estimates on the number of trips associated with the previous police station. It simply states that new trips associated with the school will likely be less than the previous use as a police station. Without this information it is difficult to approve the application (or justify its approval) in accordance with Policy C2, as it hasn't been demonstrated that the number of traffic movements will not increase.”*

*I think the applicants transport consultant should try to provide this information by using similar sites as a comparison. There are several other police stations in the borough, West Hampstead Police Station may be a good comparison.*

- 1.8 In conversation with Camden Council's Highways Department it has been confirmed that reference to Policy C2 is the only transport related issue with the planning submission, there are no other concerns from a highways viewpoint.
- 1.9 The purpose of this Technical Note is to respond to the formal consultation response from Camden Council's Highways Officer.

## 2.0 CAMDEN LOCAL PLAN – RESPONSE TO POLICY C2

2.1 Camden Council's Local Plan Policy C2 and specifically paragraph 4.33 is extracted as follows for ease of reference:

*“4.33 The scale and intensity of use of some community facilities, such as schools, colleges and higher education facilities can lead to adverse impacts on residential amenity. This is principally related to the movement of large numbers of people at certain times of day, impacts such as noise and air pollution and the pressure on the transport system. The Council will ensure schemes satisfactorily address the impacts of changes to the balance and mix of uses in the area, including the cumulative impact of schemes with planning permission or awaiting determination. Hampstead and Belsize Park have a very high concentration of schools where significant issues exist concerning the ‘school run’. We will refuse applications for new schools or the expansion of existing schools in these areas, unless it can be demonstrated the number of traffic movements will not increase. Policy A1 Managing the impact of development refers to how the Council will manage the impact of traffic movements.”*

2.2 Policy A1 as referenced above is set out as follows for ease of reference:

*“Policy A1 Managing the impact of development*

*The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity.*

*We will:*

- a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;*
- b. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;*
- c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and*
- d. require mitigation measures where necessary.*

*The factors we will consider include:*

- e. visual privacy, outlook;*
- f. sunlight, daylight and overshadowing;*
- g. artificial lighting levels;*
- h. transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;*
- i. impacts of the construction phase, including the use of Construction Management Plans;*
- j. noise and vibration levels;*

*k. odour, fumes and dust;*  
*l. microclimate;*  
*m. contaminated land; and*  
*n. impact upon water and wastewater infrastructure.”*

- 2.3 In response to Policy C2 and paragraph 4.33 of the Council's Local Plan the transport submission documents make it clear that Abacus Belsize Primary School has a 'Walk to School' ethos as well as a 'Car-Free Policy' and therefore the use of the private car for drop-offs/pick-ups goes completely against the school's philosophy in this respect.
- 2.4 The School Travel Plan will target no private car use amongst pupils and staff at the proposed permanent location from first occupation through a range of physical and promotional/educational measures that are already included in the School's Travel Plan and which would be secured by the Council as a condition of any future planning permission. This in itself satisfies Policy C2 and paragraph 4.33 of the Council's Local Plan as there would evidently be no increase in vehicle traffic movements arising from the school.
- 2.5 It must also be stressed that school related trips associated with Abacus Belsize Primary School are already present on the network within and around the catchment area. They are not new trips on the network but existing trips by existing residents and their children. Even if the proposal is refused these trips will continue to be on the network as they would still have to congregate at the bus collection points to be transported to the Jubilee Waterside Centre in Kings Cross. Given the established nature of Abacus Belsize Primary School and its defined catchment area this again in itself satisfies Policy C2 and paragraph 4.33 of the Council's Local Plan as there would be no increase in vehicle traffic movements in Hampstead or Belsize Park arising from the proposal.
- 2.6 Abacus Belsize Primary School is committed to its School Travel Plan at the proposed new site, and therefore the Council has a mechanism with which to regularly check on the travel activity associated with the school. As of September 2019 the Travel Plan has attained a Silver Accreditation following Transport for London's (TfL) STARS (Sustainable Travel: Active, Responsible, Safe) scheme.
- 2.7 Based on the 'hands-up' travel mode data from the school's time at the Haverstock Hill site a short distance to the south of the proposed permanent site, 70% of children

walked, scooted, or cycled to school, 25% by public transport, and 5% by car. On this basis a full IFE school with 210 pupils will generate 147 total walk/scooter/cycle trips, 53 trips on public transport, and only 11 trips by private car in the morning and again in the afternoon peak periods. This information is set out in the submitted Transport Assessment.

- 2.8 On 18<sup>th</sup> September 2019; now that a new school term has commenced with a new Reception class the school has carried out a new '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 latest survey information shows that 91% of children walked, scooted, or cycled to the pick-up points, 5% used public transport, and 4% were dropped off by car.
- 2.9 It should be noted that of the few children that are currently dropped off at the private bus stop pick-up points by car, the majority are from outside of the school's defined catchment area. For the past three years of Reception admissions no place has been offered to any child outside of catchment for the start of September who does not live in catchment. The only exceptions have been for those with an older sibling in the school, 'Looked After Child' (which, in common with every state school, the school accepts regardless of catchment) or the child of a member of staff. The school has been taking admissions for seven years now, so there are still siblings of early pupil intakes that were accepted from outside of the catchment area. By the time the school moves to its permanent site, it is likely that many of these children will have left the school. The percentage of children from catchment is therefore likely to move even closer to 100% by September 2022 when it is projected that the new site will be established. Therefore it is reasonable to expect that no children will be dropped off at the new site by car.
- 2.10 It is also worth pointing out that the latest travel mode survey results from September 2019 would be sufficient for the school to achieve a Gold accreditation for its School Travel Plan and it would therefore be among the top 10% of schools in London in terms of sustainable travel.

### “Gold

Be among the top 10% of London schools, setting high standards to inspire others to transform travel habits, fully engage the wider community to promote best practices, and see a measurable reduction in the number of journeys made by car every day.

What you need to do:

- Within three academic years complete 25 different travel activities, 15 supporting activities and 8 consultation activities
- Provide evidence for each activity completed
- Demonstrate at least a 6% modal shift away from the car or at least 90% of pupils travelling actively.”

2.11 In terms of establishing the trips that would have been generated by the former Hampstead Police Station and the magistrate’s court when it was fully operational, given that the application site is vacant it has not been possible to carry out a survey of existing traffic movements. 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 have been interrogated however there is no data available in either database for these specific land use classes.

2.12 It is understood that the Police Station was once staffed by 300 police officers, with a canteen, magistrates’ court, and cells with 14 parking spaces provided at the rear. It is therefore a reasonable expectation that the former site use has the potential to generate a significant number of vehicle and person trips throughout a typical weekday and at weekends, much more than the proposed use as a home for the Abacus Belsize Primary School.

2.13 The only way to establish the number of traffic movements that might have been associated with the former Police Station and magistrate’s court is by using similar sites as a comparison. It is however possible that even surveying an existing site will not yield accurate data for the following reasons:

- Firstly police station traffic data obtained from any other similarly located London based station is highly unlikely to be relatable anymore due to recent police cut backs. Data on the Mayor of London’s website states that since 2010-11 the Metropolitan Police’s general grant funding from the Government

has fallen by more than £700 million or nearly 40% in real terms. This has led to the loss of a third of police staff posts – down from 14,330 to 9,985, two-thirds of police community support officer posts – down from 4,607 to 1,591, as well as 114 police station front counters and 120 police buildings. There is no way of knowing or accurately forecasting the impact of these cut-backs on general traffic activity at London police stations, however it casts significant doubts as to whether any data obtained can be relied upon;

- Secondly even if a traffic survey at another police station and at a magistrate's court were carried out, deriving an accurate vehicle trip rate per sqm floor area/parking space/member of staff would be extremely complex. Most big police stations such as the former Hampstead Police Station are being wound down in favour of smaller facilities. It is very difficult to accurately know how Police Stations are currently operating (i.e. 50% of capacity / 75% of capacity). It is also very difficult to obtain accurate floor area to derive a trip rate. Magistrate's courts are also extremely difficult to find and survey. There is nothing reliable that we can see. Furthermore, if this were a TRICS based assessment we should use at least 5-6 sites per land use following the TRICS best practice guide.

2.14 Notwithstanding, we have discussed this point with Camden Council's Highways Department as the Council has requested further clarity on the proposal in relation to Policy C2.

2.15 Camden Council referenced West Hampstead Police Station in its consultation response as being potentially similar to the former Hampstead Police Station. We visited the West Hampstead Police Station and spoke to a uniformed officer there who confirmed that there are only around six community officers currently based at this station who patrol on-foot, plus a further six mounted forces officers (there are currently around six police horses at the station). Activity appeared to be extremely light and there is no public counter at the station, which was removed in around 2013. We have since discussed and agreed with the Council that West Hampstead Police Station is not worthwhile surveying as it is currently not in any way comparable to conditions when the former Hampstead Police Station was fully utilised.



- 2.16 Kentish Town Police Station is the last remaining fully operational station in the Borough of Camden, and it has been agreed with Camden Council that a survey of this station is a reasonable comparison to the former Hampstead Police Station albeit that there is no magistrate's court.
- 2.17 Kentish Town Police Station is 24 hour operational and has a public counter. The Metropolitan Police gave us written authorisation to carry out the survey at Kentish Town which was duly carried out on Wednesday 11<sup>th</sup> September 2019 from 0700-1900. The survey comprised of a manual count of all arrivals and departures by time and by mode at the station. The main entrance for the public is to the front of the site via Holmes Road, there is a rear access via Regis Road which is used by the Police staff only.
- 2.18 Table 1 as follows presents the total number of trips recorded entering and leaving the Kentish Town Police Station by mode and by time period throughout the course of the survey:

Table 1. Kentish Town Police Station; Traffic Survey 11-09-2019

| Survey Time | KENTISH TOWN POLICE STATION SURVEY - TOTAL |        |                   |        |                  |        |
|-------------|--|--------|-------------------|--------|------------------|--------|
|             | Vehicle                                    |        | Vehicle Passenger |        | Pedestrian/Other |        |
|             | Arrive                                     | Depart | Arrive            | Depart | Arrive           | Depart |
| 07:00-07:30 | 1  | 8      | 1                 | 6      | 6                | 13     |
| 07:30-08:00 | 1  | 6      | 1                 | 6      | 8                | 3      |
| 08:00-08:30 | 0  | 4      | 0                 | 5      | 8                | 1      |
| 08:30-09:00 | 1  | 0      | 0                 | 0      | 8                | 2      |
| 09:00-09:30 | 2  | 3      | 2                 | 3      | 10               | 3      |
| 09:30-10:00 | 8  | 3      | 8                 | 3      | 10               | 6      |
| 10:00-10:30 | 4  | 7      | 4                 | 7      | 5                | 8      |
| 10:30-11:00 | 7  | 4      | 6                 | 4      | 17               | 3      |
| 11:00-11:30 | 1  | 3      | 1                 | 5      | 8                | 7      |
| 11:30-12:00 | 2  | 5      | 2                 | 5      | 1                | 5      |
| 12:00-12:30 | 3  | 0      | 3                 | 0      | 2                | 1      |
| 12:30-13:00 | 4  | 3      | 4                 | 3      | 8                | 6      |
| 13:00-13:30 | 6  | 4      | 5                 | 4      | 12               | 7      |
| 13:30-14:00 | 6  | 0      | 5                 | 0      | 16               | 5      |
| 14:00-14:30 | 4  | 2      | 4                 | 2      | 10               | 12     |
| 14:30-15:00 | 5  | 7      | 5                 | 8      | 5                | 16     |
| 15:00-15:30 | 7  | 5      | 6                 | 8      | 6                | 17     |
| 15:30-16:00 | 3  | 0      | 3                 | 0      | 8                | 13     |
| 16:00-16:30 | 15   | 0      | 7                 | 0      | 10               | 8      |
| 16:30-17:00 | 2  | 0      | 3                 | 0      | 1                | 9      |
| 17:00-17:30 | 4  | 5      | 7                 | 5      | 7                | 5      |
| 17:30-18:00 | 2  | 4      | 2                 | 7      | 2                | 4      |
| 18:00-18:30 | 0  | 3      | 0                 | 3      | 1                | 5      |
| 18:30-19:00 | 2  | 2      | 3                 | 3      | 5                | 2      |
| Total       | 90   | 78     | 82                | 87     | 174              | 161    |
| Total 2-Way | 168  |        | 169               |        | 335              |        |

Source: PMA Survey

2.19 The data in Table 1 demonstrates that the Kentish Town Police Station generates 168 total two-way vehicle trips in a 12 hour period on a typical weekday as well as 169 total two-way vehicle passenger trips and 335 total two-way pedestrian/other modal trips.

2.20 Kentish Town Police Station measures approximately 2,415m<sup>2</sup> GIA and is very similar in size to the former Hampstead Police Station building which measures at approximately 2240m<sup>2</sup> GIA. However it is clear that the station is unlikely to be utilised to its full capacity for the reasons set out in paragraph 2.13. Therefore the application of this data

is likely to underestimate the number of vehicle trips that would have been generated by the former Hampstead Police Station and magistrate's court.

- 2.21 Notwithstanding, it is evident that the former site uses would have generated a steady stream of vehicle trips throughout a typical weekday whereas the school will aim to generate **zero** vehicle trips during the 'school run' from the outset of first occupation at the new premises. This will be set out in the School's Travel Plan which will be secured as a condition of any future planning permission.
- 2.22 Policy A1 as referenced in Policy C2 of the Council's Local Plan clearly states that Transport Assessments, Travel Plans, and Delivery and Servicing Management Plans can be treated as satisfactory mitigation measures where necessary.
- 2.23 On this basis the planning application can reasonably be considered to be compliant with Policy C2 paragraph 4.33 and Policy A1 of Camden Council's Local Plan.