



Kensington Forum

QUEENSGATE
INVESTMENTS

Rockwell

wsp

Kensington Forum Hotel – London

TRANSPORT ASSESSMENT ADDENDUM | JULY 2020



Queensgate Bow UK Holdco Limited

KENSINGTON FORUM, CROMWELL ROAD

Transport Assessment Addendum



Queensgate Bow UK Holdco Limited

KENSINGTON FORUM, CROMWELL ROAD

Transport Assessment Addendum

TYPE OF DOCUMENT (VERSION) PUBLIC

PROJECT NO. 70024917

OUR REF. NO. 001

DATE: JULY 2020

WSP

WSP House
70 Chancery Lane
London
WC2A 1AF

Phone: +44 20 7314 5000

Fax: +44 20 7314 5111

WSP.com



QUALITY CONTROL

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	Draft	For Issue		
Date	July 2020	July 2020		
Prepared by	Thomas Giles	Thomas Giles		
Signature				
Checked by	Bryony Vaughan/ Rea Turohan	Bryony Vaughan/ Rea Turohan		
Signature				
Authorised by	Alec Prince	Alec Prince		
Signature				
Project number	70024917	70024917		
Report number	001	001		
File reference				



CONTENTS

1	INTRODUCTION	1
1.1	BACKGROUND	1
1.2	OVERVIEW	1
2	PLANNING POLICY GUIDANCE	3
2.1	INTRODUCTION	3
2.2	REVISED REGIONAL POLICY	3
2.2.1	INTEND TO PUBLISH LONDON PLAN (2019)	3
2.3	LOCAL POLICY	6
2.3.1	REVISED RBKC LOCAL POLICY	6
3	BASELINE TRANSPORT NETWORKS	8
4	SUMMARY AND CONCLUSIONS	10

1 INTRODUCTION

1.1 BACKGROUND

- 1.1.1 WSP has been commissioned by Rockwell on behalf of Queensgate Bow UK Holdco Ltd to review and, where appropriate, update the Transport Assessment provided in relation to the development proposals at Kensington Forum, 97 Cromwell Road, within the Royal Borough of Kensington and Chelsea (RBKC).
- 1.1.2 A Transport Assessment (TA) was originally prepared and submitted to the Local Planning Authority (LPA) [as standalone document and Appendix to the Environmental Statement] supporting the planning application for the site (Preference P/18/03461), received in June 2018. The LPA notified the GLA in October 2018 that it was minded to refuse the planning application.
- 1.1.3 In November 2018 the Mayor of London issued a direction to call in the planning application for the Kensington Forum development (Reference 4266). The application proposals were amended on 1st May 2019. The amendments included the following:
- an increase in the number of residential units from 46 to 62;
 - an increase in the height of the seven storey element of the building containing the residential units by two storeys to nine storeys;
 - all of the residential units now proposed as affordable;
 - internal and external reconfiguration of the residential element of the building;
 - other external alterations to the elevational design, including integration of wind mitigation measures; and
 - amendments to cycle and refuse storage at ground and basement level.
- 1.1.4 The revised application was supported by a Transport Assessment Addendum (issued April 2019).
- 1.1.5 A hearing was held in June 2019, following which the Mayor decided to grant permission for the application subject to planning conditions and conclusion of a section 106 legal agreement.
- 1.1.6 RBKC subsequently submitted a judicial review request to the High Court, challenging this decision. The Greater London Authority (GLA) consented to judgement and the decision was quashed.
- 1.1.7
- 1.1.8 As a result, there is a procedural requirement for a second Stage 3 Hearing and redetermination by the Mayor or Deputy Mayor. The GLA has asked the applicant to review and update (as necessary) its planning submission to taken into account any changes in planning policy and best practice guidance since the planning application for the Kensington Forum development was determined in June 2019. There have been no changes made to the scheme since 1 May 2019 (which were addressed in the April 2019 Transport Assessment Addendum).
- 1.1.9
- This further Transport Assessment Addendum (TAA) outlines the Policy and best practice guidance changes relevant to Transport and updates and/or verifies the assessments of the previously submitted 2018 TA and 2019 TAA.

1.2 OVERVIEW

- 1.2.1 A review of the transport documents submitted to date has been undertaken to ascertain the validity of the information contained in the previously submitted TA and TAA. An overview of the changes that have been made in each Chapter of the 2018 TA and 2019 TAA is summarised in the Table overleaf.



Table 1-1 TA and TAA Chapter Review

Chapter	To be Updated
Planning Policy and Guidance	Yes
Baseline Transport Networks	Yes
Proposed Development	No
Trip Generation	No
Transport Impact Assessment	No
Management Plans	No
Summary and Conclusions	Yes

2 PLANNING POLICY GUIDANCE

2.1 INTRODUCTION

2.1.1 This section will focus on the changes in government policy since the April 2019 Transportation Addendum. This includes:

- publication of the Intend to Publish (IP) London Plan in December 2019, and
- adoption of the Royal Borough of Kensington and Chelsea (RBKC) Local Plan in September 2019.

2.1.2 This is detailed in **Table 2-1**.

Table 2-1 Updated Policy Documents

Policy included in original TA & TAA	Updated and covered in this TAA
National Planning Policy Framework 2019	Unchanged
Mayor's Transport Strategy (March 2018)	Unchanged
The London Plan (current) 2016	Unchanged
The Draft London Plan (EiP – Minor suggested changes) 2019	Updated to Intend to Publish London Plan (2019)
RBKC Local Plan 2015	Updated to Revised in 2019
RBKC Transport and Streets Supplementary Planning Document 2016	Unchanged

2.2 REVISED REGIONAL POLICY

2.2.1 INTEND TO PUBLISH (IP) LONDON PLAN (2019)

2.2.2 The IP London Plan was published in December 2019 and is expected to be adopted by the of 2020. The document aims to ensure that London's transport is easy, safe and convenient for everyone, and encourages the use of cycling, walking and public transport.

Healthy Streets

2.2.3 The IP London Plan acknowledges that a strategic shift is needed to reduce Londoners' dependency on the car, creating a healthy, pleasant and sustainable street environment in which people can walk, cycle and use public transport.

2.2.4 'Policy T2 Healthy Streets' outlines that development proposals should:

- Demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London Guidance;
- Reduce the dominance of vehicles on London's streets whether stationary or moving; and
- Be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

2.2.5 Given the planning application was first submitted prior to the IP London Plan publication, an active travel zone assessment has not been undertaken, however a high level Healthy Streets review has been completed for the scheme. **Table 2-2** considers the proposed development against the 10 Healthy Streets indicators, highlighting where the changes would impact the scores.

Table 2-2 Healthy Streets Review

Healthy Street Indicator	Commentary
HS1: Pedestrians from all walks of life	Provision of blue badge car parking spaces are included in line with the Intend to Publish London Plan standards and the development includes improved public realm linking to the Underground station and the restoration of a public garden making the area safer and more desirable for Londoners of all walks of life.
HS2: Easy to cross	The provision of the crossing between Cromwell Road and Grenville Place and Ashburn Place, and improved pedestrian routes through the site will provide better access between rail station and local bus stops.
HS3: Shade and shelter	Through the restoration of a formal public garden places of shade and shelter are provided, improving the existing provision.
HS4: Places to stop and rest	Opportunities to stop and rest will be provided within the development in the public realm and gardens .
HS5: Not too noisy	The scheme is seeking to shelter the garden from noise through the provision of a feature wall located between the taxi drop off and greening.
HS6: People choose to walk, cycle and use public transport	Additional cycle parking (24 short-stay cycle parking spaces) will be provided in the area, as well as a contribution to cycle hire. The scheme has been designed to accommodate 'non-standard bikes' catering for the needs of all cyclists in line with the Intend to Publish London Plan and LDCS standards.
HS7: People feel safe	Active frontage is provided along the Cromwell Road which will ensure the pavement is overlooked for increased safety. The conflicts between vehicles and pedestrians are managed by giving pedestrian priority and improving the footways around the site, new crossings and a better-quality route from the site to the Underground station.
HS8: Things to see and do	The hotel lobby will feature access from Cromwell Road and Ashburn Place and the restored gardens will provide a vibrant addition to the site with ground floor activity.
HS9: People feel relaxed	The development is committing to improve the pedestrian provision in the development surroundings improving the quality of the public realm along the route from the Site to the /underground Station which will improve pedestrian safety and thus will result in a more relaxed environment for people. Furthermore, the restored gardens will offer opportunities to relax and will be easily accessed from the surroundings.
HS10: Clean air	The ES reports that there is a net zero change in air quality due to the development better building standards and increased greening.

2.2.6 The proposed development legal agreement includes contributions towards promotion of sustainable travel which are a result of the transport assessment impact assessment and proposed mitigations:

- Management Plans and financial contribution and towards the monitoring of the Management Plans (Travel Plan, Construction Logistic Plan, Deliveries and servicing Plan, Hotel Event Travel Management Plan)
- A financial contribution toward the TfL cycle hire facilities improvement;
- A financial contribution toward Legible London signage update;
- Parking permit exemption for future residents;
- Public realm improvement works (including highway works) contribution of £2.45M.

2.2.7 The Mayor's key target, as set out in Policy T1 is that:

- 80% of all trips in London are to be made by foot, cycle or public transport by 2041.

2.2.8 The Intend to Publish London Plan recognises that London's challenges of guaranteeing its status as an efficient, well-functioning globally-competitive city are intertwined with the obstacles and opportunities that transport brings. It states that the integration of land use and transport is essential in realising and maximising growth and ensuring that different parts of the city are connected in a sustainable and efficient way.

2.2.9 In order to achieve this, the Intend to Publish London Plan acknowledges that a strategic shift is needed to reduce Londoners' dependency on the car, creating a healthy, pleasant and sustainable street environment in which people can walk, cycle and use public transport.

Cycle Parking

2.2.10 The Intend to Publish London Plan cycle parking standards are summarised in **Table 2-3**.

Table 2-3 – Minimum Cycle Parking Standards

Use Class		Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)
C1	Hotels (bars, restaurants, gyms etc. open to the public should be considered individually under relevant standards)	1 space per 20 bedrooms	1 space per 50 bedrooms
C3- C4	Dwellings (all)	1 space per studio or 1 person bedroom dwelling, 1.5 spaces per 2 person 1 bedroom dwelling, 2 spaces per all other dwellings	5 to 4 dwellings 2 spaces Thereafter 1 space per 40 dwellings

2.2.11 The proposed development cycle parking was revised prior to GLA hearing in June 2019 to include the standards illustrated in the table above, as well as a percentage of the spaces being provided for larger non-standard bicycles.

2.2.12 The proposed development is therefore in compliance with the IP London Plan cycle parking standards.

Car Parking

2.2.13 With regards to parking, Policy T6 states that Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Where car parking is provided in new developments, provision should also be made for infrastructure for electric or other Ultra-Low Emission vehicles.

2.2.14 The Intend to Publish London Plan car parking standards for hotel and residential uses are summarised in **Table 2-4**.

Table 2-4 - Maximum car parking standards

Use	Location	Maximum Parking provision
Hotel and leisure uses	CAZ and locations with a PTAL 4-6	Any on-site provision should be limited to operational needs, disabled persons parking and parking required for taxis, coaches and deliveries or servicing. All operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles, including active charging points for all taxi spaces. Disabled persons parking should be provided as set out in Policy T6.5 Non-residential disabled persons parking.
Residential	Central Activities Zone	Car-free
	Inner London Opportunity Areas Metropolitan and Major Town Centres All areas of PTAL 5 – 6 and Inner London PTAL 4	Car-free
	Inner London PTAL 5-6	Car-free

- 2.2.15 In comparison to the previous version of the London Plan there are no alterations to the car parking standards.
- 2.2.16 Whilst the proposed development is not car free, the re-provided site car parking is significantly reduced and allocation will be prioritised to provide for blue badge holders first and will feature EV charging.
- 2.2.17 Since the London Plan standards have not changed as a result of the IP London Plan and the scheme remains unchanged, the information contained in the previously submitted TA and TAA remains valid.

2.3 LOCAL POLICY

2.3.1 REVISED RBKC LOCAL POLICY

- 2.3.2 The RBKC Consolidated Local Plan was adopted in September 2019. The Local Plan sets out the vision, objectives and detailed spatial strategy for future development in the Royal Borough up to 2028 along with specific strategic policies and targets, development management policies and site allocations.
- 2.3.3 In relation to transport, Chapter 20 focuses on Better Travel Choices, with Policy CO 3 detailing the strategic objective for Better Travel Choices, that walking, cycling and public transport are safe, easy and attractive, and preferred by residents to private car ownership and use.
- 2.3.4 Policy CT1 focusses on improving alternatives to car use, making it easier and more attractive to walk, cycle and use public transport and by managing traffic congestion and the supply of car parking. To deliver this it states that the Council will:
- *“a. require high trip generating development to be located in areas of the borough where public transport accessibility has a PTAL score of 4 or above and where there is sufficient public transport capacity, or that will achieve PTAL 4 and provide sufficient capacity as a result of committed improvements to public transport;*
 - *b. require it to be demonstrated that development will not result in any material increase in traffic congestion or on-street parking pressure;*
 - *c. require that all new additional residential development be permit-free;*

- *d. require car parking provided in new residential development to be at or below the adopted car parking standards;*
- *e. require that parking in non-residential development is for essential need only;*
- *f. require cycle parking, showering and changing facilities in new development;*
- *g. require improvements to the walking and cycling environment, including securing pedestrian and cycle links through new developments;*
- *h. require new development to incorporate measures to improve road safety, and in particular the safety of pedestrians, cyclists and motorcyclists, and resist development that compromises road safety;*
- *i. require Transport Assessments and Travel Plans for larger scale development;*
- *j. ensure that new developments provide or contribute toward improvements to public transport services, access to them and interchange between them, giving priority to north-south bus links and areas that currently have lower levels of accessibility;*
- *k. work with partners to ensure that step-free access is delivered at all Underground and rail stations by 2028, require new developments to contribute toward step-free access and ensure it is delivered at Underground and rail stations in the borough where there is a redevelopment opportunity;*
- *l. resist new public car parks and the loss of off-street coach parking;*
- *m. require that where a development creates new on-street parking it is managed so that parking demand is controlled and the need for off-street parking is minimised;*
- *n. require that new development adjacent to the River Thames or Grand Union Canal takes full advantage of, and improves the opportunities for, public transport and freight on the water, access to the water for recreation and walking and cycling alongside it;*
- *o. work with TfL to improve the streets within the Earl's Court one-way system by:*
 - *i. investigating the return of the streets to two- way operation, and by implementing the recommended improvements, should TfL and the Council deem them feasible;*
 - *ii. by securing improvements to the pedestrian environment;*
 - *iii. requiring developments to contribute to objectives i and ii.*
- *p. ensure that development does not reduce access to, or the attractiveness of, existing footways and footpaths used by the public, or land over which the public have a right of way."*

2.3.5 The proposed development is aligned with the new RBKC Consolidated Local Plan.

RBKC Transport and Streets Supplementary Planning Document

2.3.6 The Transport and Streets Supplementary Planning Document (SPD) was adopted in April 2016. The SPD sets out the Council's parking standards. Car parking standards are summarised within **Table 2-6**.

Table 2-6 RBKC Maximum Car Parking Standards

Land Use	Standard
C3 - Flats of 2 bedrooms or less	0.5 per dwelling
C3 - All houses or flats of 3+ bedrooms	First three dwellings: 1 per dwelling Each subsequent dwelling: 0.5 per dwelling
C1 - Hotels	1 space per 40 bedrooms

2.3.7 There are no alterations to the car parking standards in the SPD as a result of the New Local Plan and as the scheme remains unchanged, the information contained in the previously submitted TA and TAA remains valid.

2.3.8

3 BASELINE TRANSPORT NETWORKS

TA & TAA Baseline review

3.1.1 The baseline transport networks presented in the TA and TAA included:

- Pedestrian and cycle accessibility review
 - It should be noted that the review was supported by PERS and CLoS audits. Whilst the results of the audits remain valid, TfL has issued new transport assessment and best practice guidance which is promoting Active Travel Zone Assessments and Cycle Route Quality Audit tools as a method to ascertain the baseline conditions of the pedestrian and cycle networks.
- Public transport accessibility review
 - the PTAL (public transport accessibility level) for the proposed development site is excellent, whilst this remains true it should be noted that currently public transport services are operating under exceptional circumstances.
- Road network review
 - the baseline road network commentary relied upon data collected in 2016 to quantify the traffic flows, whilst the conclusions of the surveys for the specific timeframe remain valid more recent data is now available.
- Parking review
 - the current site arrangements remain unchanged.
- Personal Injury Accident (PIA) review
 - the review carried out included data for a 3-year period (2014-2017), whilst the conclusions of the PIA review for the specific timeframe remain valid more recent data is now available.

3.1.2 In consideration of the above, ordinarily the baseline transport network analysis would be validated by newly collected data, in particular with regards to:

- Out of date surveys such as the traffic surveys that are 4 years (48 months) old. New 'neutral period' surveys should be carried out to validate the previously presented baseline. In light of the recent pandemic (COVID19) and subsequent lockdown measures and social distancing measures which impact the highway layout, the transport network operations and usage has been affected. This was acknowledged by Government who are monitoring transport network usage. Any traffic surveys carried out in this period therefore would not be 'neutral', and could not be relied on to provide a 'neutral baseline'.
- Personal Injury Accident (PIA) data to include 2017 – 2019 information. The PIA information available for this period does not contain description of the accident therefore it would add little benefit, furthermore the development contributes to improvement of the public realm and pedestrian safety which would ultimately mitigate risks flagged by the PIA review.

3.1.3 Since the Proposed Development is already contributing to improve the public realm, and is aligned with Healthy Streets principles, additional audits such as the Active Travel Zone and Cycle Route Quality Audit are not deemed necessary because they are unlikely to fundamentally change the assessment conclusions.

July 2020 baseline validity

3.1.4 At the time of writing this TAA the baseline transport networks are operating under exceptional conditions.

3.1.5 The COVID-19 pandemic, also known as the coronavirus pandemic, is an ongoing pandemic of coronavirus disease 2019 (COVID-19), caused by severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).



The World Health Organization declared the outbreak a public health emergency of international concern on 30 January 2020, and a pandemic on 11 March 2020.

- 3.1.6 In response to the unprecedented public health emergency in March, the UK government imposed a lockdown, banning all "non-essential" travel and contact with people outside one's home and closing most business and gathering places.
- 3.1.7 Social distancing was found to effectively help in slowing the rate of infection and the Government published on 9 May 2020 (updated since) an update to the Traffic Management Act 2004 in response to the COVID 19 emergency.
- 3.1.8 Introducing the update, the Secretary of State acknowledged the challenge that the public transport networks are facing, and he highlighted the importance that is now placed on walking and cycling as alternative and safer mode of transport. The updated guidance introduces measures to reallocate road space to walking and cycling to enable people to move at a safe distance.
- 3.1.9 In consideration of the exceptional circumstances described above (COVID-19 related lockdown effects on transport networks), the baseline information described in the TA and TAA represents the best approximation to a baseline which we can presently rely on.

4 SUMMARY AND CONCLUSIONS

- 4.1.1 In conclusion, this document has outlined the transport related implications for the Kensington Forum GLA application in relation to:
- Planning policy updates.
 - i. Intend to Publish London Plan (2019).
 - ii. Updated RBKC Local Plan (2019).
 - Baseline transport network analysis validity.
- 4.1.2 Having concluded that the proposed development complies with the relevant standards and new policy framework, and that the baseline analysis presented in the TA and TAA (April 2019) represent the best approximation to a normalised 'current' baseline considering the exceptional circumstances at the time of writing, the proposed development scheme transport elements and the accompanying transport planning evidence remain valid.



WSP House
70 Chancery Lane
London
WC2A 1AF

wsp.com

PUBLIC