

Kensington Forum



Rockwell



Kensington Forum Hotel – London



ENVIRONMENTAL IMPACT ASSESSMENT | APRIL 2019
ENVIRONMENTAL STATEMENT ADDENDUM TECHNICAL APPENDICES | VOLUME 3

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Annex 1 Greenhouse Gas Emissions Assessment (Replacement Assessment)

Document Control

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Greenhouse Gas
Assessment:
Kensington Forum

April 2019



Experts in air quality
management & assessment

1 Introduction

- 1.1 This report provides a Greenhouse Gas (GHG) assessment for the proposed mixed-use hotel and residential scheme at Cromwell Road, Kensington, London, SW7 4DN. The scheme proposed, which includes the Proposed Amendments following consultation with the Greater London Authority, consists of the demolition of the existing hotel and the construction of new a 749-bed hotel, 340 serviced apartments and 62 residential units with a total GIA of 78,809 m².
- 1.2 GHGs are gases which have the potential to increase atmospheric temperatures and are defined further in Section 3.
- 1.3 The Amended Proposed Development will lead to the direct and indirect release of GHGs, both during the demolition and construction phase, and throughout the lifetime of the development. This assessment estimates the GHG emissions associated with the Amended Proposed Development taking a lifecycle approach and presents the mitigation provided by the scheme to minimise its GHG footprint.

2 Policy Background

- 2.1 In preparing this GHG assessment, consideration has been given to the requirements of national, regional and local planning policies.

National Planning Policy

National Planning Policy Framework

- 2.2 The National Planning Policy Framework (NPPF)¹ sets out planning policy for England. It states that the purpose of the planning system is to contribute to the achievement of sustainable development, and that the planning system has three overarching objectives, one of which is an environmental objective:

“to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.

- 2.3 Part 14 of the framework is entitled *“Meeting the challenge of climate change, flooding and coastal change”* and sets out the strategy for minimising the climate change effects of new development. Paragraph 149 describes that *“new development should be planned for in ways that can help to reduce greenhouse gas emissions through its location, orientation and design”*. The section describes how renewable and low-carbon energy sources should be considered in planning applications for development of any scale.

- 2.4 Paragraph 150 states that *“New development should be planned for in ways that [...] can help reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.”*

Climate Change Act (2008)²

- 2.5 The overarching Act in relation to climate is the Climate Change Act 2008. The Act introduces a legally binding target to reduce the UK’s GHG emissions to at least 80% below 1990 levels by 2050. It also provides for a Committee on Climate Change (CCC) with power to set out carbon budgets binding on the Government for 5 year periods.

¹ Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework,

² Her Majesty’s Stationery Office, 2008. Climate Change Act 2008.

2.6 In the 2009 budget, the first three carbon budgets were announced which set out a binding 34% CO₂e³ reduction by 2020; and the Government has since adopted the fourth and fifth carbon budgets to reduce CO₂e by 50% by 2025 and 57% by 2030.

2.7 The CCC also produces annual reports to monitor the progress in meeting these carbon budgets. Consequent upon the enactment of the Climate Change Act, a raft of policy at national and local level has been developed aimed at reducing carbon emissions.

Energy Act (2013)⁴

2.8 The Energy Act makes a provision for the setting of a decarbonisation target range, duties in relation to it and for the reforming of the electricity market for the purposes of encouraging low carbon electricity generation.

Climate Change and Sustainable Energy Act (2006)⁵

2.9 The Climate Change and Sustainability Act enhances the contribution of the UK to combating climate change and securing a diverse and viable long-term energy supply by boosting the number of heat and electricity microgeneration installations in the United Kingdom.

The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting (2018)⁶

2.10 The National Adaptation Programme sets out government's response to the second Climate Change Risk Assessment, showing the actions government is, and will be, taking to address the risks and opportunities posed by a changing climate. It forms part of the five-yearly cycle of requirements laid down in the Climate Change Act 2008 to drive a dynamic and adaptive approach to building our resilience to climate change.

The Clean Growth Strategy⁷

2.11 The Clean Growth Strategy sets out a comprehensive set of policies and proposals that aim to accelerate the pace of "clean growth", i.e. deliver increased economic growth and decreased emissions. In the context of the UK's legal requirements under the Climate Change Act, the UK's approach to reducing emissions has two guiding objectives:

³ Carbon dioxide equivalent (CO₂e) is a term for describing different greenhouse gases in a common unit. For any quantity and type of greenhouse gas, CO₂e signifies the amount of CO₂ which would have the equivalent global warming impact.

⁴ Her Majesty's Stationery Office, 2013. Energy Act 2013.

⁵ Her Majesty's Stationery Office, 2006. Climate Change and Sustainable Energy Act 2006.

⁶ Defra (2018) The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting

⁷ HM Government (2017) The Clean Growth Strategy

1. To meet our domestic commitments at the lowest possible net cost to UK taxpayers, consumers and businesses; and,
2. To maximise the social and economic benefits for the UK from this transition.

2.12 The Strategy contains policies relating to the delivery of clean, smart and flexible power, including reducing power costs for homes and businesses and more transparent carbon pricing.

The Carbon Plan: Delivering Our Low Carbon Future (2011)⁸

2.13 The Carbon Plan sets out the Government's plans for achieving the emissions reductions commitment made in the Climate Change Act 2008. A pathway consistent with meeting the 2050 target is outlined.

2.14 This publication brings together the Government's strategy to curb greenhouse gas emissions and deliver climate change targets.

Regional Policy

The London Plan⁹

2.15 The London Plan 2016 establishes strategic planning policy for London over the next 20 – 25 years and promotes the fundamental objective of accommodating London's population and economic growth through sustainable development. It sets out the Spatial Development Strategy for Greater London and the Development Plans of all London Boroughs must eventually comply with the general requirements of the London Plan.

2.16 To support borough planners, the Mayor published a guidance document through London Renewables: 'Integrating Renewable Energy into New Developments: A Toolkit for Planners, Developers and Consultants', and more recently the Supplementary Planning Guidance, "Sustainable Design and Construction", 2013.

2.17 The London Plan includes planning policies both for reducing energy consumption within buildings and, significantly, promoting the use of decentralised electricity generation and renewable energy. These policies cover the role of boroughs in supporting the Mayor's Energy strategy and the requirements of planning applications.

2.18 The Energy Planning – 'GLA Guidance on preparing energy assessments' (March 2016) states the requirement to minimise carbon dioxide emissions. The document indicates that carbon dioxide emissions for non-domestic developments should be reduced by at least **35%** below those

⁸ HM Government, (2011), The Carbon Plan: Delivering Our Low Carbon Future.

⁹ GLA, 2016 The London Plan: The Spatial Development Strategy for London Consolidated with Alterations since 2011.

emissions targeted by the Building Regulations Part L 2013. These emissions should include those covered by the Building Regulations and those that are not covered by the Building Regulations.

2.19 In line with Policy 5.2, the revised GLA's energy assessment guidance explains that the carbon reduction target for new development will change from 1 October 2016 as follows:

“Schemes received by the Mayor on or after the 1st October 2016:

- **Zero carbon homes** (as defined in section 5.2 of the Housing SPG) for residential developments. *This means that residential areas must achieve at least 35% reduction in regulated carbon emissions over Part L 2013 and the remaining regulated CO₂ emissions to achieve 100% saving are to be offset through a cash in lieu contribution to the relevant borough;*
- *Carbon emissions 35% below Part L 2013 for commercial/non-domestic development.”*

2.20 Therefore, the target reduction on CO₂ emissions for the Amended Proposed Development according to the GLA's requirements is:

- Zero Carbon for Domestic Areas; and
- 35% below Part L2A 2013 for Non-Domestic Areas.

2.21 The London Plan recognises that energy efficiency should come before energy supply considerations and has suggested a simple strategy known as the Mayor's Energy Hierarchy, which is described in Policy 5.2. The process follows good practice in the design of low carbon buildings and comprises three distinct stages and order of application:

1. Use Less Energy (Be Lean);
2. Supply Energy Efficiently (Be Clean); and
3. Use Renewable Energy (Be Green).

2.22 This strategy puts energy efficiency/conservation measures first in order to reduce the demand for energy, 'Be Lean'. Following this, consideration must be given to supplying the resultant reduced energy demand as efficiently as possible, including the use of combined heat and power (CHP), 'Be Clean'. Finally, sources of renewable energy should be examined, 'Be Green'.

2.23 As stated in Policy 5.6, the Mayor will expect all major developments to demonstrate that the proposed heating and cooling systems have been selected in accordance with the following order of preference:

- Connection to an existing C/CHP scheme;
- Site-wide C/CHP; and
- Communal heating and cooling.

2.24 Where C/CHP is to be installed in a new development, the feasibility of extending the system beyond the site should be investigated. In addition, provision will be made for the heating and cooling network for future connections to district heating networks.

2.25 As stated in Policy 5.7, the current London Plan includes a notional target for on-site renewable energy, unless it can be demonstrated that such provision is not feasible. This target is for renewable energy on major developments to achieve a 20% reduction in carbon dioxide emissions after any energy efficiency measures and (non-renewable) C/CHP schemes have been applied according to paragraph 5.42.

2.26 The Plan also states that provision must be made in some form for the future hydrogen economy (i.e. the development of energy infrastructure based on hydrogen as the principal energy carrier). However, take up of these technologies is recognised to be unrealistic in the current planning environment.

2.27 Policy 5.3 Sustainable Design and Construction is also relevant and states that;

“Planning decisions:

B. Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.

C. Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and the following sustainable design principles:

- a. minimising carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems)*
- b. avoiding internal overheating and contributing to the urban heat island effect*
- c. efficient use of natural resources (including water), including making the most of natural systems both within and around buildings*
- d. minimising pollution (including noise, air and urban runoff)*
- e. minimising the generation of waste and maximising reuse or recycling*
- f. avoiding impacts from natural hazards (including flooding)*
- g. ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions*
- h. securing sustainable procurement of materials, using local supplies where feasible, and*

i. promoting and protecting biodiversity and green infrastructure.”

Draft London Plan¹⁰

2.28 The draft London Plan sets out the Mayor's spatial development strategy for London. It provides an update to the existing London Plan and introduces a number of new and revised policies. In particular relevance to greenhouse gas emissions, the plan describes that “*the Mayor is committed to London becoming a zero-carbon city*”. It also explains that “*‘Carbon’ is used in the London Plan as a shorthand term for all greenhouse gases*”.

2.29 Policy SI2 in the draft New London Plan relates specifically to greenhouse gas emissions; it states:

“Policy SI2 – Minimising Greenhouse Gas Emissions

A. *Major development should be net zero-carbon. This means reducing carbon dioxide emissions from construction an operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy:*

1. *Be lean: use less energy and manage demand during construction and operation.*
2. *Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly. Development in Heat Network Priority Areas should follow the heating hierarchy in Policy SI3 Energy infrastructure.*
3. *Be green: generate, store and use renewable energy on-site.*

B. *Major development should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy and will be expected to monitor and report on energy performance.*

C. *In meeting the zero-carbon target, a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Residential development should aim to achieve 10 per cent, and non-residential development should aim to achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, and shortfall should be provided:*

1. *through a cash in lieu contribution to the relevant borough's carbon offset fund, and/or*
2. *off-site provided that an alternative proposal is identified and delivery is certain.*

D. *Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver greenhouse gas reductions. The operation of offset funds should be monitored and reported on annually.”*

¹⁰ GLA, 2018. Draft New London Plan.

2.30 These requirements are broadly consistent with those in the GLA's Guidance on preparing energy assessments' (March 2016), described above.

Energy Planning – Greater London Authority Guidance on Preparing Energy Assessment¹¹

2.31 This guidance provides details on how to address the Mayor's Energy Hierarchy through the provision of an energy assessment to accompany strategic planning applications.

Sustainable Design and Construction Supplementary Planning Guidance¹²

2.32 In April 2014, the Mayor published the Sustainable Design and Construction Supplementary Planning Guidance (SPG) to provide guidance to developers. This SPG details the Mayor's standards, covering a wide range of sustainability measures that major developments are expected and encouraged to meet. It covers the following areas:

- Resource Management;
- Adapting to Climate Change and Greening the City; and
- Pollution Management

Delivering London's Energy Future: The Mayor's Climate Change Mitigation and Energy Strategy¹³

2.33 This strategy sets out the Mayor's strategic approach to limiting further climate change and securing a low carbon energy supply for London.

2.34 To limit further climate change impacts, the Mayor has set a target to reduce London's CO₂ emissions by 60% on 1990 levels by 2025. The strategy details the programmes and activities that are on-going across London to achieve this. This strategy also details policies and activities underway to reduce CO₂ emissions from new development and transport through The London Plan and the Mayor's Transport Strategy.

¹¹ Greater London Authority, 2015. Energy Planning – Greater London Authority Guidance on Preparing Energy Assessments.

¹² Greater London Authority, 2014. Sustainable Design and Construction, Supplementary Planning Guidance, London: Greater London Authority.

¹³ Greater London Authority, 2011. Delivering London's Energy Future: The Mayor's Climate Change Mitigation Energy Strategy.

London Environment Strategy¹⁴

2.35 The London Environment Strategy, published in May 2018, sets out an action plan for environmental improvement in London up to 2050 and covers a range of core environmental aspects including energy and climate change, air quality, green infrastructure, waste and noise.

2.36 The strategy sets a series of targets, including the aim to make London a zero carbon city by 2050; reiterating the same commitment as is included in the draft New London Plan. The strategy sets out a series of measures designed to achieve this aim, which are focussed upon delivering zero-carbon energy, zero-carbon transport and zero-carbon development. The strategy also sets out plans for retro-fitting existing buildings to enable them to be considered to be zero-carbon.

Local Policies

2.37 The scheme is subject to Kensington & Chelsea's Local Consolidated Local Plan Strategic Policies July 2015. Policy CE1 states:

"The Council recognises the Government's targets to reduce national carbon dioxide emissions by 26 per cent against 1990 levels by 2020 in order to meet a 60 per cent reduction by 2050 and will require development to make a significant contribution towards this target".

2.38 To deliver this the Council requires:

- a) *New Residential developments should be Code Level 4 and none residential schemes should meet BREEAM Very good with 60% of unweighted credits available in energy;*
- b) *Refurbishments meet BREEAM Excellent (Residential) and BREEAM Very Good (Non Residential);*
- c) *Carbon emissions are reduced in accordance with the energy hierarchy, that being to consider energy efficient design and passive solutions first, secondly to consider decentralized heating, cooling and energy supplies are considered (CHP/ CCHP) and thirdly, to consider on site renewable and low carbon energy sources are considered;*
- d) *To provide CHP or CCHP of a suitable size to service the development and contribute to local district heat and energy network;*
- e) *Require all CHP or CCHP plant to connect to or be able to connect to other existing or planned CCHP plant or similar from a district heat network;*
- f) *Require development to connect into existing district heat network where accessible;*
- g) *Incorporate measures that will contribute to on site sustainable food production; and*

¹⁴ Greater London Authority, 2018. London Environment Strategy

h) *Require the development to further reduce carbon dioxide emissions through financial contributions.*

2.39 As a "major" application, the scheme should meet the requirements of London Plan policies 5.2 to 5.9, by achieving a 35% carbon reduction for both domestic and non-domestic aspects of the scheme.

3 Scope of Assessment

3.1 The EIA Directive 2014¹⁵ sets out the rationale for incorporating climate change into the EIA process. It states:

“Climate change will continue to cause damage to the environment and compromise economic development. In this regard, it is appropriate to assess the impact of projects on climate (for example greenhouse gas emissions) and their vulnerability to climate change.”

3.2 The requirements of the EIA Directive 2014 have been adopted within UK EIA Regulations 2017¹⁶ and require that the assessment provides:

“A description of the likely significant effects of the development on the environment resulting from, inter alia:

(f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change”.

3.3 This assessment only covers the impact of the project on climate through the quantification of GHGs resulting from the Amended Proposed Development. The impact of future climate change on the resilience of the Amended Proposed Development has not been addressed in this report and is examined in the Sustainability Statement¹⁷ and chapters 6 -11 of the Environment Statement Volume 1 of the June 2018 ES.

¹⁵ Directive 2014/52/EU of the European Parliament and of the Council on the assessment of effects of certain public and private projects on the environment.

¹⁶ See <https://www.gov.uk/guidance/environmental-impact-assessment#Preparing-an-Environmental-Statement>¹.

¹⁷ XCO2, 2018, Sustainability Statement, Kensington Forum

4 Assessment Methodology

4.1 The GHG assessment has taken a whole life approach to develop a GHG footprint for the Amended Proposed Development. The footprint sources considered include:

- Embedded GHGs from the material used in the construction of the Amended Proposed Development;
- GHGs from waste generation, demolition and traffic movements during construction of the Amended Proposed Development;
- GHGs from energy consumed by the operation of the Amended Proposed Development; and
- GHGs from transport associated with the operation of the Amended Proposed Development.

4.2 Table 1 sets out the baseline and scenarios adopted by the assessment, key sources of data and methodologies used.

Table 1: GHG Assessment Scenarios

Development Phase	Baseline	Amended Proposed Development	Methods and Data Sources	Reference
Demolition and Construction: Embedded Carbon	The baseline is taken to be the existing building on the site.	The completed development as defined in Chapter 4 of the ES.	GHG calculation based on RICS GHG factors per GIA m ² of development (see Figure 1).	ES Addendum Chapter 1.
Demolition and Construction: Transport	The baseline is assumed to be zero.	Traffic generated by the demolition of the existing building on the site and construction of the Amended Proposed Development.	Application of BEIS GHG factors to km travelled by vehicle type (see Table 2).	BlueSky Building.
Operation: Transport	2016 transport GHG for existing site prior to demolition.	Opening year (2026) transport GHG emissions.	Application of BEIS GHG factors to km travelled by mode from transport assessment (see Table 3).	Transport Assessment.
Operation: Energy	The baseline is taken to be compliance with Part L 2013 building regulations.	The Amended Proposed Development including proposals to meet the Mayor's Climate Change Strategy: be lean, be clean and be green, incorporating extensive energy efficiency measures along with low and zero carbon (LZC) applications.	CO ₂ savings relative to the baseline are taken from the Energy Statement.	Energy Statement.

4.3 The metric for assessing the climate change impacts of GHG emissions in this assessment is Global Warming Potential (GWP). This is expressed in units of CO₂ equivalent (CO₂e) over 100

years. This allows for the emissions of the six key GHG: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulphur hexafluoride (SF₆) expressed in terms of their equivalent global warming potential in mass of CO₂e.

4.4 The assessment (using the methodologies referenced in Table 1 above) determines the baseline GHG emissions and the GHG emissions from the Amended Proposed Development in the year of opening (assumed to be 2026). The ‘net emissions’ are the change in the GHG emissions between the baseline and the Amended Proposed Development, taking account of GHG reduction measures and offsetting.

Construction

4.5 Embedded GHG emission factors for construction are presented in Figure 1. The factors have been obtained from the Royal Institution of Chartered Surveyors (RICS) publication on a methodology to calculate embodied carbon of materials¹⁸. The factors are provided as kilograms of CO₂ equivalent per m² of Gross Internal Area (GIA) and provide a method of calculating the embedded carbon in the development by multiplying the GIA area information for the Amended Proposed Development by the appropriate carbon factor (high rise residential tower) detailed in Figure 1.

4.6 The assessment also considers GHG emissions from demolition and construction traffic. GHG emission factors for construction transport have been obtained from the Department of Business, Energy and Industrial Strategy (BEIS) publication on GHG Conversion Factors for Company Reporting¹⁹ which sets out GHG emissions factors for a range of construction vehicle types.

4.7 A summary of the GHG emission factors for selected construction vehicles types used in this GHG assessment are provided in Table 2.

¹⁸ RICS, 2012. Methodology to calculate embodied carbon of materials. RICS information paper, IP 32/2012.

¹⁹ BEIS, 2017: UK Government GHG Conversion Factors for Company Reporting.

Table 2: Demolition and Construction Vehicle GHG Factors

Vehicle Type	BEIS Type	Unit	kg CO ₂ e	kg CO ₂
10 m rigid (flatbeds or enclosed)	Rigid (>7.5 - 17 tonnes)	km (average laden)	0.66058	0.65172
4 Axle tippers (Muck away from demolition and dig)	Rigid >17 tonnes	km (average laden)	0.96353	0.95061
Concrete mixer trucks (4 axle 8 m ³ capacity)	Rigid >17 tonnes	km (average laden)	0.96353	0.95061
Articulated lorries	Articulated >33t	km (average laden)	0.93631	0.92396
Vans	Average (up to 3.5 tonnes)	km	0.25749	0.25561

4.8 The calculation of demolition and construction transportation GHG emissions is carried out by multiplying the transport GHG factors detailed in Table 2 above by km travelled by mode, as provided by the project construction consultants²⁰.

²⁰ BlueSky Building, email correspondence

Single point GHG emission (kgCO₂e/m²)

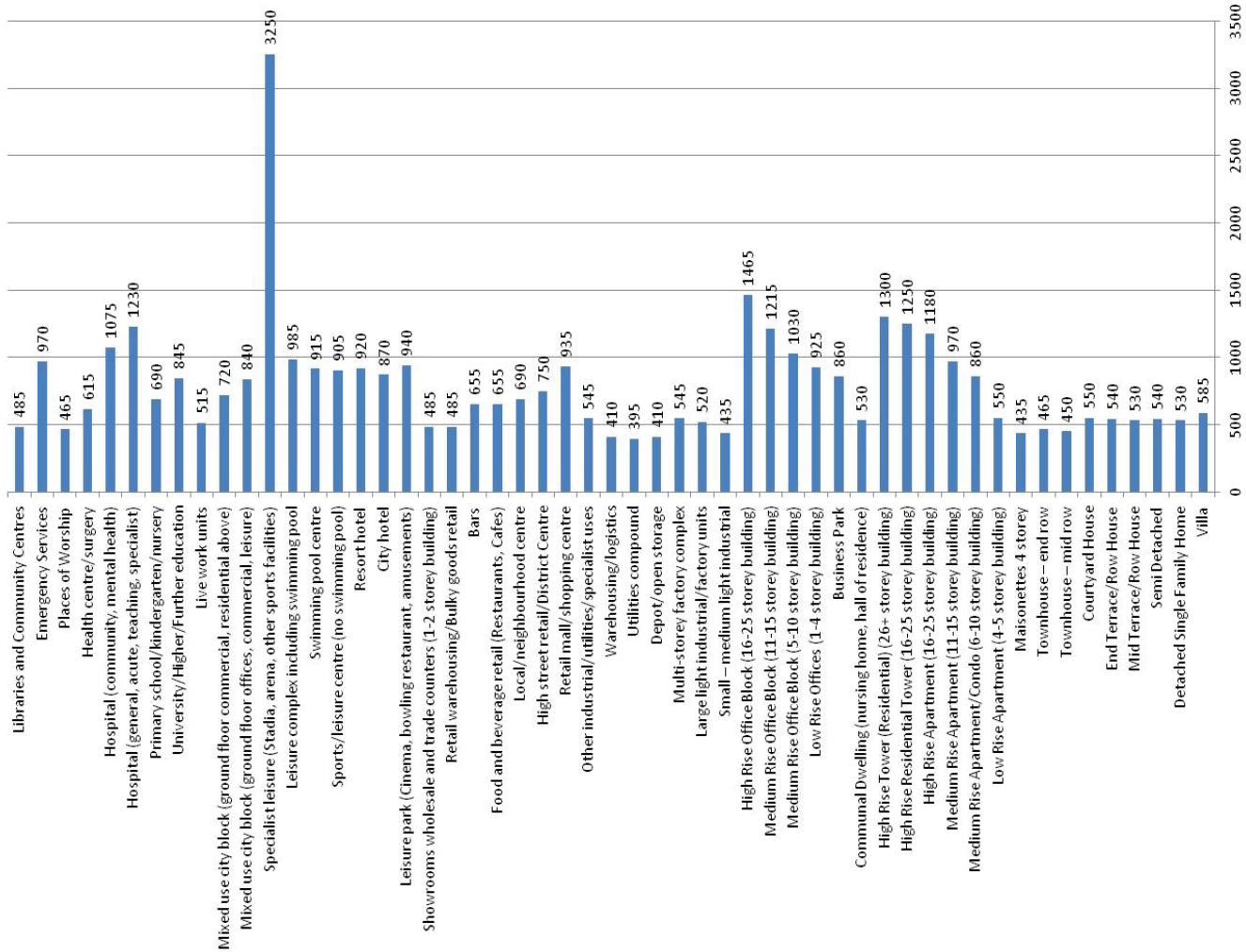


Figure 1: GHG Emission Factors for Construction

Figure reproduced from RICS, "Methodology to calculate embodied carbon of materials" RICS information paper, IP 32/2012.

Operation

Transport

- 4.9 GHG emission factors for transport have been obtained from the Department of Business, Energy and Industrial Strategy (BEIS) publication on GHG Conversion Factors for Company Reporting²¹ which sets out GHG emissions factors for a range of modes of transport. A summary of the GHG emission factors for selected modes of transport used in this GHG assessment are provided in Table 3.

Table 3: Transport GHG Factors by Mode (selected modes)

Activity	Type	Unit	kg CO ₂ e	kg CO ₂
Car Travel	Average car	km	0.18242	0.18109
		miles	0.29357	0.29143
Motorcycle travel	Average motorcycle	km	0.11662	0.11398
		miles	0.18768	0.18343
Taxis	Regular taxi	passenger.km	0.15617	0.15483
		km	0.21863	0.21676
	Black cab	passenger.km	0.21337	0.21212
		km	0.32006	0.31819
Bus	Local London bus	passenger.km	0.0727	0.07226
	Coach	passenger.km	0.0278	0.0274
Rail	National rail	passenger.km	0.04678	0.04636
	London Underground	passenger.km	0.04674	0.04638

- 4.10 The calculation of transportation GHG emissions is carried out by multiplying the transport GHG factors detailed in Table 2 above by km travelled by mode, as provided by WSP, who has undertaken the Transport Assessment for the Amended Proposed Development²².

²¹ BEIS, 2017: UK Government GHG Conversion Factors for Company Reporting.

²² WSP, Kensington Forum Transport Assessment. January 2019

Energy Consumption

- 4.11 In terms of the baseline setting for energy use, the IEMA guidance acknowledges that baseline energy use for an existing building can be very difficult to calculate and recommends that baseline energy use either be considered to be zero, or an alternative baseline can be considered, whereby GHG emissions from an alternative development or building design are considered. In this case, in the absence of data on the energy use of the existing building, an alternative baseline has been considered which assumes the Amended Proposed Development is constructed to comply with Building Regulations Part L, which are the minimum requirements in terms of energy consumption.
- 4.12 Fuel CO₂ emission factors based on the SAP and NCM document for Building Regulations Part L 2013 compliance have been used to determine the CO₂²³ emissions that will be emitted as a result of the running of the energy systems employed by the Amended Proposed Development. The CO₂ emission factors used are presented in Table 4. To calculate CO₂ from operational energy, the factors from Table 3 are multiplied by the energy consumption data modelled in the energy assessment²⁴. Further detail on the energy modelling and the energy use data used to inform this assessment is provided in the Energy Statement.

Table 4: CO₂ Emission Factors for Energy

Fuel Source	Emission Factor (kgCO ₂ /kWh)
Natural Gas	0.216
Grid Electricity	0.519

Significance of Effects

- 4.13 For GHG emissions there are no recognised significance criteria.
- 4.14 The approach taken is therefore to consider the calculated GHG emissions from the Amended Proposed Development in the context of CO₂ emissions for the Greater London Authority and the Royal Borough of Chelsea and Kensington (the RBKC) as published within the London Atmospheric Emissions Inventory²⁵.
- 4.15 Further, specifically in terms of defining significance, guidance from IEMA²⁶ has been adopted, which has identified three underlying principles to inform the assessment of significance, as follows:

²³ The SAP software used for compliance with Part L only calculates CO₂ emissions and these are used in lieu of CO₂e for the purposes of this assessment.

²⁴ PSH, 2018, Energy Statement, Kensington Forum

²⁵ <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory-2013>

²⁶ IEMA “Assessing Greenhouse Gas Emissions and Evaluating their Significance” .

1. the GHG emissions from all projects will contribute to climate change; the largest interrelated cumulative environmental effect;
2. the consequences of a changing climate have the potential to lead to significant environmental effects on all topics in the EIA Directive – e.g. population, fauna, soil, etc.; and
3. GHG emissions have a combined environmental effect that is approaching a scientifically defined environmental limit, as such any GHG emissions or reductions from a project might be considered to be significant.
- 4.16 Based on these principles, IEMA conclude that:
1. all projects create GHG emissions that contribute to climate change;
2. climate change has the potential to lead to significant environmental effects; and
3. there is a GHG emission budget that defines a level of dangerous climate change whereby any GHG emission within that budget can be considered as significant.
- 4.17 Therefore, in the absence of any significance criteria or a defined threshold, IEMA recommends that all GHG emissions are significant and that the EIA should ensure the project addresses their occurrence by taking mitigating action.
- 4.18 In terms of mitigation, IEMA recommends that mitigation should in the first instance seek to avoid GHG emissions. Where GHG emissions cannot be avoided, the development should aim to reduce the residual significance of a project’s emissions at all stages. Where GHG emissions remain significant, but cannot be further reduced approaches should be considered that compensate the project’s remaining emissions.

5 Baseline Conditions

Demolition and Construction

5.1 The baseline embedded carbon relates to the existing buildings on the site. A hotel is currently located on the site, which will be demolished. Any embedded carbon in the demolition materials is not additional to this project and a worst case assumption is taken that none of the materials are recycled or reused and therefore the baseline embedded carbon is assumed as zero.

Operation

5.2 The baseline GHG emissions for transportation are calculated based on the existing (2016) traffic generated by the development site prior to demolition and reported within the Transport Assessment. There are no data available on the existing energy use of the site and, for the purposes of this assessment, the baseline is assumed to be an equivalent development that meets existing Part L requirements. A summary of the estimated baseline GHG emissions is provided in Table 5.

Table 5: Summary of Baseline GHG Emissions

Development Phase		Baseline CO ₂ e Emissions (tonnes/annum)	Comment/Rationale
Construction		0	Assumed that no materials in existing buildings are recycled or reused.
	Transport	1,113	See detailed calculation in Table 7.
Operation	Energy	4,410	See detailed calculation in Table 8.
	Total	5,523	Transport + Energy

5.3 The total estimated baseline GHG emissions are 5,523 tonnes/annum CO₂e.

6 Likely Significant Effects

Calculation of GHG Footprint

Demolition and Construction – Embedded Carbon

- 6.1 The GIA for the development is 78,809 m² and is made up of 62 residential units, 340 serviced apartments and a 749-bed hotel, over 29 storeys. For the purposes of the carbon assessment a worst case relevant carbon factor of 1,300 kg CO₂e/m² is taken from Figure 1, relating to a high rise residential tower (25+ levels).
- 6.2 This gives an embedded CO₂e figure for the Amended Proposed Development of 102,452 tonnes.
- 6.3 Since the site is brownfield and does not result in a change of use, no land use change GHG emissions²⁷ are assumed to occur.

Construction – Transport

- 6.4 In addition to embedded carbon in the materials used for construction, GHG emissions will be created by transportation of demolition and construction materials. These emissions are typically materially smaller than embedded GHG emissions.
- 6.5 The assessment multiplies GHG emission factors published by BEIS²⁸ for each mode of travel (see Table 2) by the number of round trips and distance travelled as advised by the project construction consultants and reproduced in Table 6 below. The total number of vehicles round trips have been estimated based on TRICS Construction Traffic Research that states that for every £100,000 of construction cost produces 29.4 one-way vehicle trips.

²⁷ Land use change can result in GHG emissions for example by the removal of habitats (eg trees) that act as carbon sinks.

²⁸ BEIS, 2017: UK Government GHG Conversion Factors for Company Reporting.

Table 6: Demolition and Construction Vehicle GHG Factors

Vehicle Type	BEIS Type	kgCO ₂ e/km	Number of Vehicle Round Trips	Round Trip Distance (km)	Tonnes CO ₂ e
10 m rigid (flatbeds or enclosed)	Rigid (>7.5 - 17 tonnes)	0.66058	7,403	80	391
4 Axle tippers (Muck away from demolition and dig)	Rigid >17 tonnes	0.96353	10,797	80	832
Concrete mixer trucks (4 axle 8 m ³ capacity)	Rigid >17 tonnes	0.96353	13,011	16	201
Articulated lorries	Articulated >33t	0.93631	5,139	300	2,310
Vans	Average (up to 3.5 tonnes)	0.25749	13,336	80	275
Totals	n/a	n/a	49,686	n/a	4,008

6.6 The total estimated GHG emissions from demolition and construction transport are 4,008 tonnes of CO₂e.

Operation – Transport

6.7 The assessment of transport related GHG emissions for the baseline and for the Amended Proposed Development in the opening year are presented in Table 7. The assessment multiplies GHG emission factors published by BEIS²⁹ for each mode of travel (see table 2) by the distance travelled modelled by the Transport Assessment reproduced in Table 7 below.

Table 7: Assessment of GHG Emissions from Transport

Mode	Distance Travelled per Annum (km) ^a		CO ₂ e Tonnes (per annum)		
	Baseline	Amended Proposed Development	Baseline	Amended Proposed Development	Net Emissions
	2016	Opening Year	2016	Opening Year	
National Rail	7,291,510	8,199,061	341	384	42
Underground / DLR	5,668,689	6,481,198	265	303	38
Bus/tram	841,206	950,742	61	69	8
Taxi / Other	1,371,736	5,776,601	369	1556	1186
Car	416,863	213,608	76	39	-37
Motorcycle	0	0	0	0	0
Cycle	29,839	83,669	0	0	0
Walk	410,542	547,081	0	0	0
Total	n/a	n/a	1,113	2,350	1,238

^a Except national rail, underground and bus, which are passenger km figures taken from the Transport Assessment.

^b CO₂e emissions are calculated by multiplying distance travelled by CO₂e factors by mode from Table 3.

Operation – Energy Consumption

6.8 The calculation of the CO₂ emissions from energy consumption of the Amended Proposed Development are described in the Energy Statement. This involves multiplying the energy consumed by each energy system used within the Amended Proposed Development by the appropriate CO₂ conversion factor, as detailed in Table 4.

6.9 The Energy Statement compares the Amended Proposed Development to a notional “baseline” of compliance with Part L Building Regulations.

6.10 Table 8 summarises the improvement in performance for the Amended Proposed Development for regulated CO₂ emissions, taking into account measures to address the Mayor’s Climate Change Strategy to be lean, be clean, be green and offsets to meet the GLA target for zero carbon residential development.

²⁹ BEIS, 2017: UK Government GHG Conversion Factors for Company Reporting.

Table 8: Assessment of CO₂ Emissions from Energy Consumption

Regulated Emissions	Residential (Tonnes CO ₂ per annum)	Non-domestic (Tonnes CO ₂ per annum)	Site-wide (Tonnes CO ₂ per annum)
Baseline (no energy strategy)	62	4,348	4,410
With Energy Strategy	29	2,625	2,654
% Improvement	47%	40%	40%
Annual savings from off-set payments	-29	0	-29
Net Emissions ^a	0	2,625	2,625

^a Taking into account offsets to meet GLA target zero carbon (residential).

Total GHG Emission Footprint

6.11 Table 9 and Figure 2 summarise the GHG emissions for the Amended Proposed Development in the opening year for each footprint element. The GHG emissions from embedded materials used in construction are annualised assuming a 50 year life. Annualising the embedded GHG emissions allows them to be compared on a like-for-like basis to the operational GHG emissions which are reported on a per annum basis.

Table 9: GHG Footprint for Amended Proposed Development for Opening Year ^c

Development Phase	Footprint Element	Tonnes of CO ₂ e/annum		
		Baseline	Opening Year	Net Emissions
Construction	Embedded	0	2,049 ^a	2,049
	Transport	0	80 ^b	80
Operation	Transport	1,113	2,350	1,238
	Energy	4,410	2,625	-1,785
Total		5,523	7,105	1,582

- ^a Total embedded emissions from construction (102,452 tonnes – see paragraph 6.2) divided by 50 year lifetime.
- ^b Total transport emissions from construction (4,008 tonnes – see paragraph 6.6) divided by 50 year lifetime.
- ^c All figures are rounded

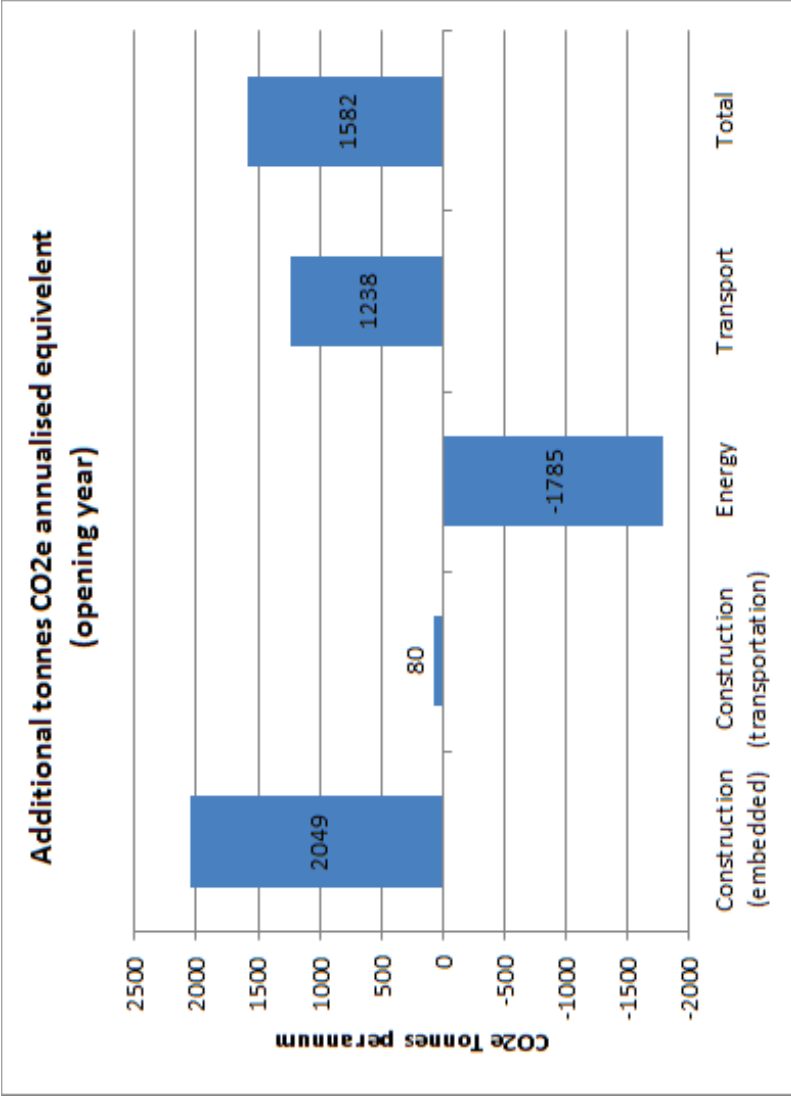


Figure 2: Change in GHG Emissions for the Amended Proposed Development in the Opening Year

Assessment of Significant Effects

- 6.12 The assessment of the significance of the residual GHG emission is informed through comparison to CO₂³⁰ emissions calculated for the Greater London Authority Area and the RBKC and reported within the London Atmospheric Emission Inventory³¹, as well as IEMA guidance that indicates that any increase in GHG emissions should be considered significant. Data extract from the inventory is reproduced as Appendix A2.
- 6.13 Table 10 presents residual CO₂e data for the Amended Proposed Development with a comparison to CO₂ emissions data taken from the London Atmospheric Emissions Inventory for the whole of London for the year 2025 (the closest year available to the Amended Proposed Development opening year of 2026).

³⁰ The London Inventory does not provide CO₂e data. Using CO₂ data as a comparator ensures the % calculated in the tables that follow are worst case.

³¹ <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory-2013>

Table 10: Comparison of Opening Year CO₂e Emissions, Proposed Development vs GLA

Footprint Element	Opening Year CO ₂ e emissions (tonnes) Amended Proposed Development	Opening Year CO ₂ emissions (tonnes) within GLA ^a	Notes	Amended Proposed Development as % of GLA
Construction (embedded)	2,049	n/a	There is no data on embedded CO ₂ for London	n/a
Construction (transport)	80	300,432	Based on Non Road Mobile Machinery	0.03%
Transport	2,350	5,918,390	Combined data for road and rail	0.04%
Energy	2,625	10,060,101	Combined data for domestic and commercial gas and other fuels	0.03%
Total All Sources ^b	7,105	19,975,746	Total all GLA sources	0.04%

^a The London Atmospheric Emissions Inventory data presented in the table are for 2025.

^b Total includes sources not listed in this table.

6.14 Comparison of the GHG emissions of the Amended Proposed Development to those within the GLA inventory shows that the Amended Proposed Development is less than 0.04% of total emissions in the GLA and no more than 0.04% when looking at individual aspects of the footprint.

6.15 Table 11 below presents residual CO₂e data for the development with a comparison to CO₂ emissions data taken from the London Atmospheric Emissions Inventory for the RBKC³².

³² <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory-2013>

Table 11: Comparison of Opening Year CO₂e Emissions, Amended Proposed Development vs Royal Borough of Kensington and Chelsea

Footprint Element	Opening Year CO ₂ e emissions (tonnes) Amended Proposed Development	Opening Year CO ₂ emissions (tonnes) within Royal Borough of Kensington and Chelsea	Notes	Development % Kensington and Chelsea
Construction (embedded)	2,049	n/a	There is no data on embedded CO ₂ for London	n/a
Construction (transport)	80	2,871	Based on Non Road Mobile Machinery	2.8%
Transport	2,350	101,353	Combined data for road and rail	2.3%
Energy	2,625	246,180	Combined data for domestic and commercial gas and other fuels	1.1%
Total ^b	7,105	352,225	Total all sources Kensington and Chelsea	2.0%

^a The data presented in the table are for 2025.

^b Total includes sources not listed in this table

6.16 The GHG emissions from the Amended Proposed Development from construction and operation are small in the context of the GLA and higher in the context of Kensington and Chelsea GHG emission inventories. Nonetheless, as IEMA recommends, any increase should be considered significant with a focus on mitigation through the following principles:

- a. seeking to avoid any increases at source and putting in place measures to reduce any residual emissions; and
- b. compensating for any remaining emissions as far as possible.

6.17 The GHG emissions from the Amended Proposed Development are therefore considered significant.

7 Mitigation

7.1 Mitigation adopted by the Amended Proposed Development is described in this section for each element of the GHG footprint.

Construction

BREEAM

7.2 BREEAM is a recognised environmental assessment method developed by the BRE Global. The aims of BREEAM are:

- to mitigate the life cycle impacts of buildings on the environment;
- to enable buildings to be recognised according to their environmental benefits;
- to provide a credible, environmental label for buildings; and
- to stimulate demand and create value for sustainable buildings, building products and supply chains.

7.3 An important aspect governing BREEAM rating includes material choice to minimise embedded carbon (see paragraph 7.6 for details of measures adopted by the Amended Proposed Development).

7.4 The Amended Proposed Development will be assessed under BREEAM New Construction (NC) 2014 and target to achieve a minimum of “Excellent” rating.

7.5 The pre-assessment described in the Sustainability Strategy³³ indicates a score of 75.7% can be achieved, exceeding the 70% target for “Excellent”.

Materials and Waste

7.6 The choice, quantities and sourcing of materials will materially influence the embedded carbon footprint of the Amended Proposed Development. To minimise embedded carbon and meet BREEAM “Excellent” rating the following measures will be adopted:

- Life cycle impacts: the materials specified for the main building elements will have a low environmental impact. For this development, the external walls, windows, upper floor slabs, internal walls, roof and floor finishes will achieve Green Guide ratings of between A+ and C. Furthermore, in compliance with the requirements of the exemplary level criteria life cycle assessment modelling will be carried out to calculate embodied carbon;

³³ XCO2, Sustainability Statement, Kensington Forum

- Insulation: all insulation specified for the Amended Proposed Development will have a low embodied environmental impact relative to its thermal properties;
- Material efficiency: at the end of each RIBA stage the project team will convene to examine opportunities to implement appropriate measures to ensure that the amount of materials used in the construction of the Amended Proposed Development are optimised and therefore reduce the amount of construction waste and thus embedded carbon arising from site; and
- Construction waste management: a Resource Management Plan (RMP) or Site Waste Management Plan (SWMP) covering non-hazardous construction waste and dedicated off-site manufacture will be developed, to ensure that the amount of waste generated is lower than or equal to 6.5 tonnes per 100 m² of gross internal floor area. In addition, 80% of non-demolition waste and 90% of demolition waste must be diverted from landfill thus reducing the embedded carbon from the Amended Proposed Development.

Operation

Transport

7.7 The Amended Proposed Development is highly accessible and has excellent public transport links, reducing the reliance of building users of emissions-heavy personal travel, such as cars.

7.8 Other key measures to limit GHG from transportation sources include:

- At least one adequately secure and lit cycle storage space will be provided for every 10 members of staff. Staff will have access to changing areas, lockers and shower facilities;
- On-site car parking provision will be restricted, encouraging the use of public transport; and
- A draft Travel Plan will be developed as part of the design and feasibility stages, encouraging the use of sustainable modes of transport of people and goods during the buildings’ operation and use.

Energy Consumption

7.9 Key mitigation measures adopted by the Amended Proposed Development to minimise GHG emissions from energy use over the building’s operational phase include the following:

- Use of building fabric efficiencies that improve on the Energy Efficiency Standards set out in the building regulations;
- A community heating network utilising high efficiency gas condensing boilers in conjunction with a CHP unit. This has been designed to provide opportunity to connect into a district heating system should one become available in the future;

- High efficiency mechanical ventilation with heat recovery and summer time bypass to the residential units;
- Decentralised ventilation for the hotel and residential units to increase diversity and eliminate unnecessary distribution losses;
- High efficiency chillers and low energy lighting;
- Daylight linking where practical with occupancy linked light control where practical; and
- A solar PV array that can generate circa 55,000 kWh per annum.

7.10 The Energy Statement provides further details in respect of these mitigation measures.

Mitigation Summary

7.11 Table 12 sets out an assessment of the Amended Proposed Development's approach to mitigation against the mitigation principles described in IEMA guidance (as discussed in paragraph 6.16), to avoid and reduce GHGs where practicable and compensate for any residual emissions.

Table 12: Amended Proposed Development Approach to Mitigation in Accordance with IEMA Mitigation Principles

Development Phase	Avoid and Reduce GHGs	Compensate GHGs
Construction	Good and best practice approach adopted to minimise materials with high embedded carbon, including use of recycled material. Best practice measures to minimise GHGs from construction activities and adoption of best practice performance standards and guidelines for construction e.g. BREEAM "Excellent" rating.	n/a
Operation: Transport	Measures are adopted into the design of the development that aim to reduce car journeys and encourage low/zero carbon alternatives (e.g. cycling/walking).	n/a
Operation: Energy	Energy saving measures to meet Mayor's climate change strategy achieving an overall 40% reduction versus a Part L compliant building.	Carbon offsets of 29 tonnes per annum to ensure zero carbon domestic development. ³⁴

³⁴ See PSH, Energy Statement, 2018

8 Residual Effects

8.1 The mitigation and off-setting measures described in Section 7 will be implemented to minimise the GHG emissions during construction and throughout the lifetime of the Amended Proposed Development, however, a net increase in GHG emissions, as summarised in Table 9 and Figure 2, will remain.

8.2 IEMA guidance makes clear that any increase in GHG emissions should be considered significant; however, the residual emissions are a small component in the context of the local and regional GHG emissions (see Table 10 and Table 11) and mitigation provided follows best practice and is in accordance with relevant local, regional and national policy on climate change. It is therefore judged that although the residual effects are described as significant these have been minimised through an appropriate degree of mitigation consistent with best practice and IEMA guidance.

9 Summary

9.1 The GHG assessment has identified that the Amended Proposed Development will lead to GHG emissions, which are described as significant in accordance with IEMA best practice guidance on the assessment of GHGs for EIA. Mitigation is provided to avoid, reduce and offset the GHG emissions, which follows the key principles of GHG mitigation in the IEMA guidance and is consistent with the requirements of relevant policy.

10 Glossary

AQC	Air Quality Consultants
BRE	Building Research Establishment
BREEAM	Building Research Establishment Environmental Assessment Method
CO₂e	Carbon Dioxide Equivalent
DHW	Domestic Hot Water
EIA	Environmental Impact Assessment
GHG	Greenhouse Gas
GIA	Gross Internal Area
GLA	Greater London Authority
IEMA	Institute of Environmental Management and Assessment
LZC	Low and Zero Carbon
LTHW	Low Temperature Hot Water
NCM	National Calculation Model
RICS	Royal Institution of Chartered Surveyors
SAP	Standard Assessment Procedure

11 Appendices

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A1 Professional Experience

Dr Graham Earl, PhD, IMECHE

Dr Earl is the founder of Ecolyse, an environment and sustainability management company providing expert advice and consultancy on environmental regulation compliance and a range of services across the environmental sector, including climate change strategy, carbon footprinting and climate change adaption and mitigation strategies. Dr Earl has over 25 years' experience in the field of environment and asset management, with roles as an environment, sustainability and risk management consultant, as environmental lead at Gatwick and Stansted airports, and Head of Climate Change for Heathrow Airport. Since the formation of Ecolyse, Dr Earl has also led the delivery of Heathrow Airport's 3rd runway sustainability strategy.

Chris Whall, BSc (Hons) MSc CEnv MIEnvSc MIAQM

Mr Whall is Managing Director of Air Quality Consultants. He has 20 years' experience in environmental consulting with multi-sector EIA experience and technical expertise in air quality and emissions management, emissions quantification, ambient air quality monitoring and impact assessment. Mr Whall's work has included the provision of air quality advice and the delivery of impact assessments for UK and international developments, including airports, road, rail, power stations, energy from waste, mining and other major regeneration schemes. He has contributed to the air quality components of major Environmental Statements for airports, including Heathrow, Gatwick and Stansted in the UK, and has provided strategic air quality advice to the European Investment Bank in relation to international airport expansion. Mr Whall also provided overall technical direction to the air quality team delivering the Environmental Statements for the Hinkley Point C nuclear power station Development Consent Order (DCO), on behalf of EDF Energy. Recently Mr Whall led the air quality assessment to support the ending of the Cranford Agreement at Heathrow Airport to introduce full runway alternation during easterly operation; he appeared as an Expert Witness on behalf of Heathrow Airport Limited at the Public Inquiry in 2015. For several years, Mr Whall has been working with Heathrow Airport Limited in the development of its masterplan for a third runway. Mr Whall also led Heathrow's air quality submissions to the Airports Commission.

Laurence Caird, MEarthSci CSci MIEnvSc MIAQM

Mr Caird is an Associate Director with AQC, with over 12 years' experience in the field of air quality, including the detailed assessment of emissions from road traffic, airports, heating and energy plant, and a wide range of industrial sources, including the thermal treatment of waste. He has experience in ambient air quality monitoring for numerous pollutants using a wide range of techniques, and is also competent in the monitoring and assessment of nuisance odours and

dust. Mr Caird has worked with a variety of clients to provide expert air quality services and advice, including local authorities, planners, developers and process operators. He is a Member of the Institute of Air Quality Management and is a Chartered Scientist.

Full CVs are available at www.aqconsultants.co.uk.

A2 Extract from London Atmospheric Emissions Inventory



Kensington Forum Air Quality Assessment

Year	2025										
Borough	Values Road Transport				Domestic and Commercial			Domestic and Commercial Other			Total
	Aviation	River	Rail	Industry	NRMM	Gas	Fuels	Other			
Barking and Dagenham	125,822	-	7,941	1,513	298,056	15,901	182,271	13,320	20,343	665,168	
Barnet	351,999	223	-	2,477	172	6,440	498,584	5,669	12,340	877,903	
Bexley	170,922	10,331	6,261	782	17,718	12,367	245,074	8,602	47,348	519,406	
Brent	185,617	319	-	7,936	10,026	11,901	367,533	7,294	739	591,364	
Bromley	225,200	1,397	-	690	-	4,548	400,503	8,763	12,889	653,989	
Camden	132,703	-	-	4,615	-	5,143	327,206	5,076	21	474,765	
City	44,302	1,609	2,033	-	-	1,311	83,037	921	-	133,212	
City of Westminster	212,884	-	1,741	2,209	-	6,289	438,210	7,030	42	668,405	
Croydon	216,163	280	-	1,323	5,092	7,670	424,300	5,741	17,308	677,877	
Ealing	255,513	164	-	9,637	-	12,324	392,784	9,111	12,294	691,827	
Enfield	329,347	397	-	474	792,013	17,218	332,321	7,873	43,840	1,523,484	
Greenwich	207,816	8,328	6,583	556	10,180	17,016	331,354	6,498	10,549	598,880	
Hackney	108,457	147	-	769	26	11,573	232,307	2,446	-	355,725	
Hammersmith and Fulham	101,117	13,592	81	2,002	40	4,705	227,089	3,636	84	352,345	
Haringey	117,540	-	-	1,947	-	10,565	284,986	3,114	-	418,151	
Harrow	123,992	237	-	3,305	28,058	2,912	297,045	3,184	5,197	463,930	
Havering	335,107	3,690	579	1,842	13,513	11,322	297,767	7,760	254,696	926,276	
Hillingdon	366,256	694,258	-	8,773	74,516	24,646	348,014	32,830	168,979	1,718,273	
Hounslow	252,871	96,682	98	348	20,000	18,880	261,869	6,791	61,383	718,921	
Islington	85,427	-	-	1,474	10,659	5,861	243,388	3,022	-	349,829	

Kensington and Chelsea	100,046	1,719	15	1,307	-	2,871	243,212	2,968	87	352,225
Kingston	144,779	-	36	511	14,000	1,617	187,788	2,154	162	351,047
Lambeth	145,592	-	1,182	851	-	6,200	357,425	2,777	-	514,026
Lewisham	141,220	12	2	1,295	404,000	11,859	282,882	2,854	1,644	845,767
Merton	118,501	-	-	660	1	2,690	223,780	3,585	11,171	360,389
Newham	168,382	49,640	1,734	2,197	224,951	25,282	315,183	14,494	5,956	807,820
Redbridge	231,301	1,062	-	652	13	2,572	301,779	5,638	51,758	594,776
Richmond	146,340	38,463	241	121	10,000	1,396	254,150	3,580	2,397	456,688
Southwark	144,280	1,601	2,596	653	-	6,568	325,217	3,542	43	484,501
Sutton	100,829	44	-	-	2,751	3,061	204,252	4,462	16,691	332,090
Tower Hamlets	150,891	15,950	7,020	2	-	12,263	335,540	5,026	6,816	533,509
Waltham Forest	160,141	738	-	1,864	13	11,544	262,742	4,321	1,647	443,010
Wandsworth	152,954	12,066	136	1,292	26	3,917	345,234	3,193	1,408	520,167
Grand Total	5,854,313	952,887	38,282	64,077	1,935,825	300,432	9,854,826	207,274	767,830	19,975,746

Appendix: Socio-Economics (Replacement Appendix)

Annex 1 Planning Policy Context

Socio-Economic Policy Context

Key National Planning Policy

National Planning Policy Framework, Ministry of Housing, Communities and Local Government (MHCLG), 2019

The National Planning Policy Framework¹, 2019 (NPPF) sets out the Government’s planning policies for England and how these are expected to be applied.

At the heart of the NPPF is a “*presumption in favour of sustainable development*”. It articulates the Government’s vision for how the planning system should operate, and identifies three interdependent roles for the planning system, to be pursued in mutually supportive ways:

- An economic role – ensuring that the right amount of land is available at the right time and place in order to support growth, innovation and improved productivity;
- A social role – providing a sufficient number and range of homes, accessible services, and open space, in a well-designed and safe built environment, to meet the needs of present and future generations and to support communities’ health, social and cultural well-being; and
- An environmental role – contributing to protecting and enhancing our natural, built and historic environment.

The policy framework set out within: Chapter 5 ‘Delivering a sufficient supply of homes’; Chapter 6 ‘Building a strong, competitive economy’; and Chapter 8 ‘Promoting healthy and safe communities’ is of greatest relevance to this socio-economic assessment.

Planning Practice Guidance, MHCLG (Live Online Resource)

The PPG² is an online resource which went live in 2014. It provides technical guidance and further detail on the policies contained within the NPPF.

The PPG highlights the need for local authorities to identify both the housing and economic needs of their areas of jurisdiction in order to plan effectively for the future. The objective of identifying need, as set out in the PPG, is to:

- identify the future quantity of housing needed;
- identify the future quantity of land or floorspace required for economic development uses; and

¹ Ministry of Housing, Communities and Local Government, 2019. National Planning Policy Framework. London. HMSO.

² Ministry of Housing, Communities and Local Government (Live Document) Planning Practice Guidance [online] Available: <http://planningguidance.communities.gov.uk/>

- provide a breakdown of that analysis in terms of quality and location in order to provide an indication of gaps in current land supply.

The outputs of assessments should input into Local Plans that are “positively prepared to deliver sustainable development that meets local needs and national priorities” (Paragraph: 001 Reference ID: 12-001-20140306).

There is also recognition that good quality design is an integral part of ensuring that development responds in a practical and creative way to both the function and amenity of a place. Good design is considered to have the potential to deliver a number of planning objectives including safe, connected and efficient streets; crime prevention; security measures; access and inclusion; and cohesive and vibrant neighbourhoods.

Key Regional Planning Policy

The London Plan, Greater London Authority (GLA), 2016

The London Plan³ sets out the Mayor’s vision for London and outlines the strategic approach to economic, social, environmental and transport development in London over the next 20 - 25 years.

An overall vision is set out for London to excel among global cities; expand opportunities for people and enterprises; achieve the highest standard of environmental standards and quality of life; and lead the world in its approach to tackling 21st century urban challenges.

The vision is supported by six key objectives⁴ that aim to embody sustainable development by ensuring London is a city:

- that is internationally competitive and successful city with a strong and diverse economy;
- that meets the challenges of economic and population growth;
- of diverse, strong, secure and accessible neighbourhoods;
- that delights the senses;
- that becomes a world leader in improving the environment locally and globally; and
- where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities.

Among the key themes of the London Plan is the need to increase London’s housing supply, and deliver an average of 42,000 net additional homes per year across London over the plan period (Policy ‘3.3 – Increasing Housing Supply’). The Royal Borough of Kensington and Chelsea (RBKC) has a housing target that aims to provide 7,330 new homes by 2025 (733 annually).

Further detail is set out in Policy ‘3.4 – Optimising Housing Potential’ which sets out the approach to optimise housing delivery potential through promoting higher density development in the right locations, and Policy

³ Greater London Authority (GLA), 2016. London Plan – The Spatial Development Strategy for London Consolidated with Alterations since 2011. London. GLA

⁴ GLA, 2016. London Plan – The Spatial Development Strategy for London Consolidated with Alterations since 2011, paragraph 1.53, p. 31



‘3.8 – Housing Choice’ which focuses on the need to increase housing choice in London. The provision of social infrastructure generally, but particularly school places, healthcare and children’s play space, is another focus of the London Plan. Policy ‘3.6 – Children and Young People’s Play and Informal Recreation Facilities’ requires the provision of 10 m₂ of play space per child as part of housing development across London.

The Site is geographically located within RBKC which is located in ‘Inner London’ as defined by Map 2.2 of the London Plan, and is therefore subject to Policy ‘2.9 – Inner London’. Policy 2.9 sets out a commitment to realise the potential of Inner London in ways which sustain and enhance its recent economic and demographic growth, whilst addressing areas of deprivation, ensuring the provision of appropriate workspaces for the area’s changing economy and improving the life and health of those living, working, studying or visiting the area.

The London Plan, Consultation Draft, GLA, 2018

A Consultation Draft new London Plan⁵ was published in December 2017. The consultation closed on Friday 2 March 2018 – with minor changes by th Mayor in Jan 2019 - the final plan expected to be published in Autumn 2019. It is a new Plan covering the period 2019 to 2041, and will replace the existing Plan once adopted.

The plan is underpinned by the concept of Good Growth – which is defined as growth that is socially and economically inclusive and environmentally sustainable – and builds strong and inclusive communities.

Policy GG1 Building strong and inclusive communities sets out requirements that planning:

- Ensures London generates a wide range of economic and other opportunities;
- Provides access to good quality services and amenities;
- Ensure streets and public spaces are designed to allow communities to flourish; and
- Promotes town centres that provide opportunities for social interaction.

Policy GG2 “Making the best use of land” sets out a range of measures supporting development of high-density, mixed-use places – particularly in areas close to transport, and existing town centres.

Policy GG3 “Creating a healthy city” encourages development that promotes healthy lifestyles, uses the Healthy Streets Approach, and improves access to green spaces.

Policy D7 “Public realm” requires development proposals deliver safe, accessible, inclusive, attractive, well-connected, easy to understand and maintain public realm.

Policy H1 “Increasing housing supply” sets out ten-year housing targets for each London borough (2019/20-2028/29) – the target for the RBKC is 4,880, equivalent to 488 homes per year.

⁵ GLA, 2018. London Plan – The Spatial Development Strategy for Greater London: Draft for Public Consultation, December 2017.



Policies S1-S7 set out policies with respect to social infrastructure – including healthcare, education facilities, open space and play space – requiring boroughs to plan to ensure social infrastructure meets the needs of London’s diverse communities.

Policies E1-E11 set out policies to support London’s economy.

London Housing Strategy, GLA, 2014

The London Housing Strategy⁶ sets out the former Mayor’s plans to meet the needs of London’s growing population over the next 20 years, including plans to:

- Build at least 42,000 high quality new homes a year across all tenures;
- Improve access to housing for people working in London.

Draft London Housing Strategy, GLA, 2017

The Draft London Housing Strategy⁷ sets out the new Mayor’s vision for housing in London which once adopted will replace the London Housing Strategy, 2014.

Key Local Planning Policy

Consolidated Local Plan, RBKC, 2015

The Consolidated Local Plan⁸ (CLP) sets out the vision and objectives for future development in the RBKC, covering the period up to 2028.

The key vision for the borough is set out in Policy CV1 ‘Building on Success’ which states the borough will seek to stimulate regeneration, enhance its reputation and uphold resident quality of life in order to build on the borough’s success over the next 20 years.

The strategy sets out a number of strategic objectives in support of this key vision. Strategic objectives relevant to socio-economic considerations include:

- CO1 – Keeping Life Local – states that social and community facilities should be easily accessible to enable communities to flourish;
- CO4 – An Engaging Public Realm – aims to maintain and extend an excellent standard of public realm in the borough; and
- CO6 – Diversity of Housing – states a range of housing should be available in the borough to cater for a variety of needs of residents.

Local Plan Partial Review (Regulation 22), RBKC, 2017

RBKC is undertaking a Partial Review of its existing Local Plan. The Local Plan Partial Review⁹ was submitted to the Secretary of State for Communities and Local Government on 5th May 2017 for intendment

⁶ GLA, 2014. London Housing Strategy, April 2014.

⁷ GLA, 2017. London Housing Strategy, Draft for Public Consultation, September 2017.

⁸ Royal Borough of Kensington and Chelsea (RBKC), 2015. Consolidated Local Plan.

⁹ RBKC, 2017. Local Plan Partial Review (Regulation 22), May 2017.



examination. Once adopted, the amendments will supersede the existing Consolidated Local Plan, 2015 and all remaining extant policies of the Unitary Development Plan (UDP) (outlined below).

There are no amendments of significance to this socio-economics assessment.

Unitary Development Plan Extant Policies, RBKC, 2007

RBKC Local Plan supersedes the majority of policies within the Unitary Development Plan¹⁰ (UDP). The only remaining UDP extant policy of relevance to socio-economics relates to housing mix. The UDP states that the mix of accommodation in the Borough should be related to the range in household types existing or likely to exist and to deficiencies in the range of accommodation, including provision of small residential units.

Planning Obligations SPD, RBKC, 2010

This SPD¹¹ sets out the RBKC’s approach, policies and procedures in respect of planning obligations required to minimise the impact of development by: prescribing the nature of a development; securing a contribution to compensate for a loss or damage created by a development; or, to mitigate a development’s impact on the locality.

The SPD sets out requirements for calculating planning obligations for the following social infrastructure, subject to standard charges, and relevant to the assessment of socio-economic effects:

- Affordable Housing;
- Education;
- Health Facilities;
- Libraries;
- Sport and Leisure;
- Parks and open spaces;
- Construction training; and
- Employment and training.

Obligations sought for the following infrastructure, also relevant to the assessment of socio-economic effects, will be determined on a site-by-site basis:

- Community facilities;
- Community safety;
- Securing employment premises; and
- Policing resources and emergency services.

The SPD specifies a formula for calculating child yield from developments within RBKC. This methodology is adopted within the chapter to estimate demand for school places arising from the Proposed Development.

¹⁰ RBKC, 2007. Unitary Development Plan Extant Policies.

¹¹ RBKC, 2010. Planning Obligations Supplementary Planning Document.



Guidance

Housing Supplementary Planning Guidance (SPG), GLA, 2016

The Housing SPG¹² provides guidance on the implementation of the London Plan housing policies which promote the delivery of housing by setting ambitious minimum housing provision targets and optimising density in suitable locations with good transport accessibility, and ensuring access to a range of accommodation (of different tenures, types and sizes).

Social Infrastructure SPG, GLA, 2015

The Social Infrastructure SPG¹³ sets out further guidance on the implementation of a number of London Plan policies relating to the provision of social infrastructure.

The importance of social infrastructure in creating ‘Lifetime Neighbourhoods’ is also set out within the SPG. Lifetime Neighbourhoods are places where people are able to live and work in safe, healthy, supportive and inclusive environments. A number of characteristics for Lifetime Neighbourhoods are identified within the SPG. These include:

- Neighbourhoods which are well-connected and walkable;
- A choice of homes, accessible infrastructure and services, places to spend time and to work, with a mix of accessible and adaptable uses; and
- A cohesive community which fosters diversity, social interaction and social capital.

Shaping Neighbourhoods: Play and Informal Recreation SPG, GLA, 2012

This SPG¹⁴ provides guidance and detail on the implementation of London Plan Policy 3.6 which requires provision of children’s play space as part of housing development across London. Specifically, it sets a benchmark of 10 square metres (m²) of playspace per child.

Tables 4.1 and 4.2 of the SPG set out the maximum distances that children of different ages should have to walk from their home to find appropriate play space and provides details of the type of space/facilities that should be provided. According to these tables Under 5s, 5 to 11 year olds and over 12s should have access to play space within 100 metres (m), 400m, and 800m of their homes respectively. These typologies and distances provide the benchmarks against which play provision is assessed in this chapter.

¹² GLA, 2016. Housing Supplementary Planning Guidance.

¹³ GLA, 2015. Social Infrastructure Supplementary Planning Guidance.

¹⁴ GLA, 2012. Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance.

Appendix: Traffic and Transport (Replacement Appendix)

Annex 1 Transport Assessment (Replacement Assessment)



Queensgate Bow UK Holdco Ltd

KENSINGTON FORUM, CROMWELL ROAD

Transport Assessment



Queensgate Bow **UK Holdco Ltd**

KENSINGTON FORUM, CROMWELL ROAD

Transport Assessment

PUBLIC

PROJECT NO. 70024917

OUR REF. NO. 70024917

DATE: APRIL 2019



Queensgate Bow **UK Holdco Ltd**

KENSINGTON FORUM, CROMWELL ROAD

Transport Assessment

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QUALITY CONTROL

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1 INTRODUCTION

1.1 APPOINTMENT

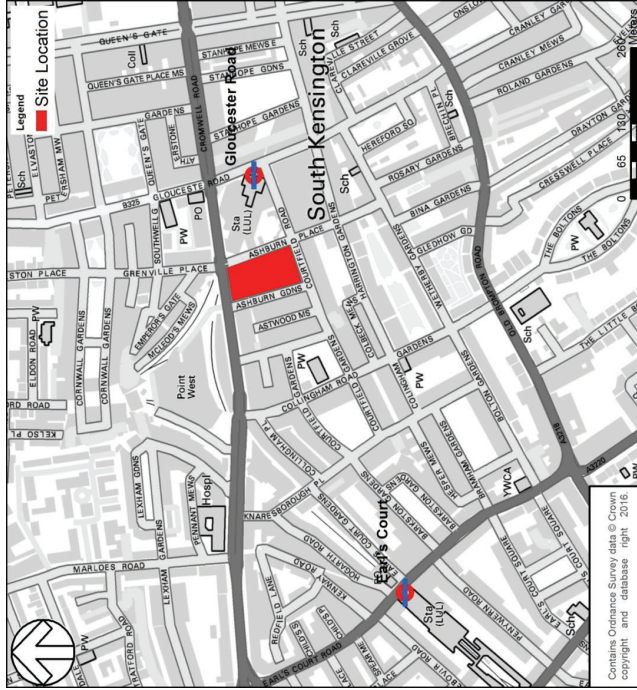
1.1.1 WSP has been commissioned by Queensgate Investments Ltd and Rockwell to provide transport consultancy advice and prepare a Transport Assessment (TA) in relation to the redevelopment proposals at Kensington Forum, 97 Cromwell Road, within the Royal Borough of Kensington and Chelsea (RBKC).

1.1.2 This TA assesses the transport implications associated with the development and considers the development in the context of national, regional and local planning policy and guidance. This TA should be read in conjunction with the other documents, plans and technical studies submitted to accompany the planning application.

1.2 SITE LOCATION

1.2.1 The site is bound by Cromwell Road to the north; Ashburn Place to the east; Ashburn Gardens to the west; and Courfield Road to the south. The site is located near to Gloucester Road Underground Station and has a PTAL 6a, demonstrating excellent public transport accessibility and suitability for high density development. The location of the site is shown in Figure 1-1.

Figure 1-1 Site Location Plan



1.3 EXISTING SITE

1.3.1 The existing Kensington Forum hotel is operated by Holiday Inn hotel and provides 906 bedrooms including retail, restaurants, meeting rooms and conferencing facilities. The existing building has a basement car park with circa 100 parking spaces.

1.4 PROPOSED DEVELOPMENT

1.4.1 The proposed development would replace the existing hotel with a new hotel of 1,089 bedrooms (749 hotel keys as well as 340 serviced apartments) and associated function/conference space, meeting rooms and restaurants, as well as 62 residential apartments.

1.4.2 The proposed development would provide 48 car parking spaces, for both the hotel and residential uses. The proposed scheme is therefore of comparable scale to the existing use at the site and will reduce the overall amount of car parking.

1.5 PRE-APPLICATION CONSULTATION

1.5.1 The Proposed Development is located in the Royal Borough of Kensington and Chelsea (RBKC) which acts as the Local Planning Authority and the Local Highway Authority. In addition, Transport for London (TfL) is also a key stakeholder as the Proposed Development meets the criteria of a large scale development referable to the Mayor of London. TfL is also the Highway Authority for the Transport for London Road Network (TLRN), the nearest part to the site is Cromwell Road.

1.5.2 A Transport Assessment Scoping Report has been issued to RBKC and TfL and pre-application meetings have been held with each party.

1.5.3 A Draft Transport Assessment has been shared with RBKC and TfL. This document captures the comments to date and has been updated to reflect the latest position.

1.6 REPORT PURPOSE AND STRUCTURE

1.6.1 This Transport Assessment has been prepared to accompany the planning application and considers the highway and transport planning implications of the proposals. The TA has been structured and written with reference to TfL's Transport Assessment Best Practice Guidance, together with the National Planning Policy Framework (NPPF), and specific RBKC policy documents.

1.6.2 The following documents should also be read in conjunction with this Transport Assessment:

- Outline Delivery and Servicing Management Plan;
- Outline Waste Management Plan;
- Outline Car Parking Management Plan;
- Coach and Taxi Management Plan;
- Outline Construction Traffic Management Plan; and
- Framework Travel Plan.

2 PLANNING POLICY & GUIDANCE

2.1 INTRODUCTION

2.1.1 The national and local transport policies relevant to this development are well documented and this chapter does not seek to replicate them. Instead, the key themes in the relevant national and local policies are summarised briefly below and, where relevant, policies which relate directly to the proposed development are addressed.

2.1.2 It is noted that emerging documents are summarised in this chapter alongside the adopted policy in recognition of the potential future context of the development, however, the application should be assessed against the adopted policy only as this is the current approved position.

2.2 NATIONAL POLICY

NATIONAL PLANNING POLICY FRAMEWORK, 2019

2.2.1 The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

2.2.2 Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

2.2.3 Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- The potential impacts of development on transport networks can be addressed;
- Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- Opportunities to promote walking, cycling and public transport use are identified and pursued;
- The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

- Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

2.2.4

Planning policies should:

- Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;
- Be prepared with the active involvement of local highway authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;
- Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;
- Provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans); and
- Provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements.

2.2.5 Applications for development should:

- Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- Allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

NATIONAL PLANNING PRACTICE GUIDANCE, 2019

2.2.6 The National Planning Practice Guidance was published in 2012 and later revised, offering updated and revised guidance on planning where necessary.

2.2.7 The online version allows stakeholders to be altered in real time when future amendments to individual policies are made, thereby ensuring that the most up-to-date guidance documents are

available. The NPPG provides additional guidance to supplement the planning policies contained in the NPPF.

- 2.2.8 The NPPG provides clarity on the role, function and structure of the Transport Assessments and Travel Plans: *Transport Assessments and Statements are ways of assessing the potential transport impacts of developments and they may propose mitigation measures to promote sustainable development. Where that mitigation relates to matters that can be addressed by management measures, the mitigation may inform the preparation of Travel Plans.*

2.2.9 Travel Plans, Transport Assessments and Statements can positively contribute to:

- encouraging sustainable travel;
- lessening traffic generation and its detrimental impacts;
- reducing carbon emissions and climate impacts;
- creating accessible, connected, inclusive communities;
- improving health outcomes and quality of life;
- improving road safety; and
- reducing the need for new development to increase existing road capacity or provide new roads.

- 2.2.10 They support national planning policy which sets out that planning should actively manage patterns of growth in order to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

2.3 REGIONAL POLICY

THE LONDON PLAN, 2016

2.3.1 The London Plan was initially published in July 2011. A number of alterations have been published since the London Plan was first adopted, namely:

- Revised Early Minor Alterations to the London Plan in October 2013,
- Further Alterations to the London Plan (FALP) in March 2015 and
- Minor Alterations to the London Plan in March 2016.

2.3.2 The London Plan is part of the statutory development plan and aims to ensure that London's transport is easy, safe and convenient for everyone, and actively encourages more walking and cycling and makes better use of the Thames.

2.3.3 The London Plan recognises that transport plays a fundamental role in addressing the whole range of spatial planning, environmental, economic and social policy priorities. It is critical to the efficient functioning and quality of life of London and its inhabitants, having major effects on places, especially around interchanges and in town centres and on the environment, both within the city itself and more widely.

2.3.4 Policy 6.1 states the importance of closer integration of transport and development and hopes to encourage this by (inter alia):

- *"Encouraging patterns of development that reduce the need to travel, especially by car;*
- *Seeking to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand;*
- *Supporting development that generates high levels of trips only at locations with high levels of public transport accessibility, either currently or via committed, funded improvements;*

- *Improving interchange between different form of transport, particularly around major rail and Underground stations, especially where this will enhance connectivity in outer London;*
- *Facilitating the efficient distribution of freight whilst minimising its impacts on the transport network;*
- *Supporting measures that encourage shifts to more sustainable modes and appropriate demand management;*
- *Promoting greater use of low carbon technology so that CO₂ and other contributors to global warming are reduced;*
- *Promoting walking by ensuring an improved urban realm; and*
- *Seeking to ensure that all parts of the public transport network can be used safely, easily and with dignity by all Londoners, including by securing step-free access where this is appropriate and practicable".*

2.3.5 Policy 6.3, regarding the effects of development on transport capacity, states that new developments which will give rise to significant numbers of new trips should be located either where there is already good public transport provision with adequate capacity to support the additional demand, or where such high-quality provision is being introduced. Phasing development, the use of Travel Plans and addressing freight issues may all help reduce the impact of the development.

2.3.6 Policy 6.9, relating to cycling, seeks to bring about a major increase in cycling such that it accounts 5% of modal share by 2026. Development should provide on-site changing facilities and showers, assist with facilitating growth of the cycle hire scheme and contribute positively towards an integrated cycling network.

2.3.7 Policy 6.10, relating to walking, states that *"development proposals should ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space."*

2.3.8 The residential car parking standards shown in Table 2-1 are also subject to variation based on the PTAL of the site. This variation is shown in Table 2-2.

Table 2-1 London Plan Maximum Car Parking Standards – Residential

Number of Beds	4 or more beds	3 beds	1-2 beds
Parking Spaces	Up to 2 per unit	Up to 1.5 per unit	Less than 1 per unit

Note: All developments in areas of good public transport accessibility (in all parts of London) should aim for significantly less than 1 space per unit.

Note: Adequate parking spaces for disabled people must be provided preferably on-site.

Note: 20% of all spaces must be for electric vehicles, with an additional 20% passive provision for electric vehicles in the future. Adequate parking spaces for disabled people must be provided, preferably on-site.

Table 2-2 Car Parking – PTAL Variation (London Plan Table 6.2)

	PTAL 0 to 1		PTAL 2 to 4		PTAL 5 to 6	
Suburban	150–200 hr/ha	Parking provision	150–250 hr/ha	Parking provision	200–350 hr/ha	Parking provision
3.8–4.6 hr/unit	35–55 u/ha	Up to 2 spaces per unit	35–65 u/ha	Up to 1.5 spaces per unit	45–90 u/ha	Up to one space per unit
3.1–3.7 hr/unit	40–65 u/ha		40–80 u/ha		55–115 u/ha	
2.7–3.0 hr/unit	50–75 u/ha		50–95 u/ha		70–130 u/ha	
Urban	150–250 hr/ha		200–450 hr/ha		200–700 hr/ha	
3.8–4.6 hr/unit	35–65 u/ha	Up to 1.5 spaces per unit	45–120 u/ha	Up to 1.5 spaces per unit	45–185 u/ha	Up to one space per unit
3.1–3.7 hr/unit	40–80 u/ha		55–145 u/ha		55–225 u/ha	
2.7–3.0 hr/unit	50–95 u/ha		70–170 u/ha		70–260 u/ha	
Central	150–300 hr/ha		300–650 hr/ha		650–1100 hr/ha	
3.8–4.6 hr/unit	35–80 u/ha	Up to 1.5 spaces per unit	65–170 u/ha	Up to one space per unit	140–290 u/ha	Up to one space per unit
3.1–3.7 hr/unit	40–100 u/ha		80–210 u/ha		175–355 u/ha	
2.7–3.0 hr/unit	50–110 u/ha		100–240 u/ha		215–405 u/ha	

2.3.9 No maximum standards are set for hotels. However in locations with a PTAL of 4–6, it is encouraged that onsite provision is limited to operational needs, parking for disabled people and that required for taxis, coaches and deliveries/servicing.

DRAFT LONDON PLAN, 2017

2.3.10 The Draft London Plan was issued for consultation in November 2017 and consultation closed in March 2018. It is not expected to be adopted until Winter 2019/20. In the meantime the current 2016 London Plan remains adopted. The Draft London Plan provides useful context for the direction of future policy, although no material weight is attached to its policies at this stage.

2.3.11 The Draft London Plan will become the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years.

2.3.12 Policy T1 notes that development proposals should target 80% of all trips in London to be made by foot, cycle or public transport by 2041. It states that:

“All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated.”

2.3.13 Policy T2 relates to Healthy Streets and seeks development that delivers patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. The Healthy Streets Approach recognises the importance of promoting and facilitating active modes of travel by making developments permeable and highly connected by foot and cycle, with reduced vehicle dominance.

2.3.14 Policy T4 identifies that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. Transport Assessments are required to support development proposals assessing any impacts on the capacity of the transport network and should focus on embedding the Healthy Streets approach within, and the in the vicinity of, new development.

2.3.15 Policy T5 sets out that development should encourage cycling and provides new cycle parking standards. Cycle parking and cycle parking areas should allow easy access and provide facilities for disabled cyclists. In places of employment, supporting facilities are recommended, including

changing rooms, maintenance facilities, lockers and shower facilities (at least one shower per ten long-stay spaces is recommended).

2.3.16 Policy T6 sets out 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. Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles. All non-residential elements of a development should provide at least one on or off-street disabled parking bay.

2.3.17 Policy T7 states that:

“Development proposals should facilitate sustainable freight and servicing, including through the provision of adequate space for servicing and deliveries off-street. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time...”

2.3.18 Cycle parking standards outlined in the Draft London Plan for the relevant land uses are summarised in Table 2-3.

Table 2-3 Draft London Plan Cycle Parking Standards

Land Use Class		London Plan Minimum Cycle Parking Standards	
C1	Hotels	Long-Stay	Short-Stay
		1 space per 20 bedrooms	1 space per 50 bedrooms
	C3-C4	1 space per studio and 1 bedroom (1 person) unit 1.5 spaces per 1 bedroom (2 person) unit 2 spaces per all other dwellings	1 space per 40 units

Note: Where the size threshold has been met, a minimum of 2 short-stay and 2 long-stay spaces must be provided for all land uses in all locations

Note: Cycle parking areas should allow easy access and cater for cyclists who use adapted cycles.

MAYOR'S TRANSPORT STRATEGY, 2018

2.3.19 The Mayor's Transport Strategy is the statutory document that sets out the policies and proposals of the Mayor of London to reshape transport in London over the next 25 years. It builds on the vision for a better London that the Mayor outlined in 'A City for All Londoners', and takes forward the approach set out in 'Healthy Streets for London'.

2.3.20 The strategy puts people's health and quality of life at the very heart of planning the city's transport. Along with the Draft London Plan and the Mayor's other strategies, it provides the blueprint for making London a city that is not only home to more people, but is a better place for all of those people to live in.

2.3.21 Three key themes are at the heart of the strategy:

■ **1. Healthy Streets and healthy people**

Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.

■ **2. A good public transport experience**

Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport could dramatically reduce the number of vehicles on London's streets.

■ **3. New homes and jobs**

More people than ever want to live and work in London. Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone.

2.4 LOCAL POLICY

RBKC LOCAL PLAN

2.4.1 The RBKC Consolidated Local Plan was adopted in July 2015. 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.

2.4.2 Policy CO 3 sets out the strategic objective for Better Travel Choices, that walking, cycling and public transport are safe, easy and attractive, and preferred by our residents to private car ownership and use.

2.4.3 Policy CT 1 aims to improve alternatives to car use. To deliver this the Council will, inter alia:

- "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;
- require it to be demonstrated that development will not result in any material increase in traffic congestion or on-street parking pressure;
- require that all new additional residential development be permit-free;
- require car parking provided in new residential development to be at or below the adopted car parking standards;
- require that parking in non-residential development is for essential need only;
- require cycle parking, showering and changing facilities in new development;
- require improvements to the walking and cycling environment, including securing pedestrian and cycle links through new developments;
- 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;
- 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."

RBKC TRANSPORT AND STREETS SUPPLEMENTARY PLANNING DOCUMENT

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 2-4.

Table 2-4 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

2.4.5 RBKC's cycle parking standards are based on those set out in the London Plan.

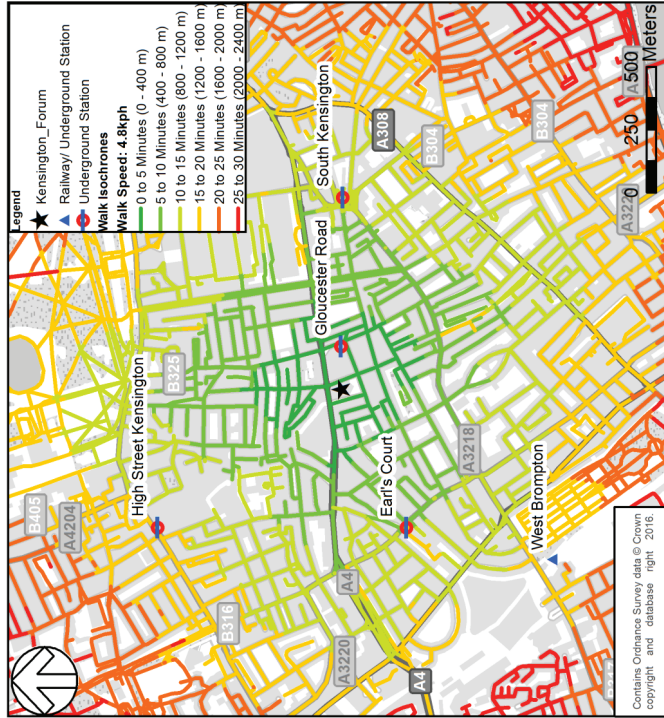
2.4.6 CTMPs (Construction Traffic Management Plans) are required with planning applications for basements and with major applications for development works. RBKC provides a CTMP pro-forma template. Draft CTMPs submitted with planning applications must provide sufficient detail to demonstrate that the construction traffic and activity associated with the proposed development works would not cause unacceptable harm to pedestrian, cycle, vehicular and road safety, adversely affect bus or other transport operations (e.g. cycle hire), significantly increase traffic congestion, nor place unreasonable inconvenience on the day to day life of those living, working and visiting nearby.

3 PEDESTRIAN AND CYCLE ACCESSIBILITY

3.1 PEDESTRIAN NETWORK

- 3.1.1 There is an established network of footways and pedestrian connections surrounding the site. Footways are provided along each of the adjacent roads. The network enables pedestrians to travel directly to and from the site and permeate through the local area to public transport nodes and other destinations.
- 3.1.2 Figure 3-1 illustrates the connectivity of the site by foot to surrounding areas by five minute walking time boundaries at a 4.8km/h travel speed. A significant area is accessible within a 30 minute walk, including some key tourist destinations.

Figure 3-1 Walking Isochrones



3.1.3

The site is located a 3 minutes' walk from Gloucester Road station (c.250m walk distance) which provides access to District, Circle and Piccadilly Line services on the London Underground.

3.1.4

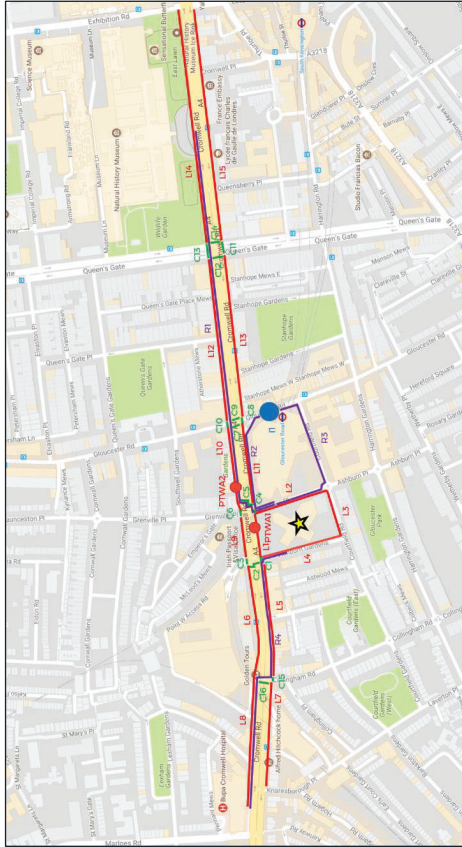
Pedestrian access to the site is currently provided from Courfield Road, Ashburn Place and Cromwell Road. Signalised pedestrian crossings accommodate north-south pedestrian movement across Cromwell Road at the junctions with Ashburn Place and Ashburn Gardens.

PERS AUDIT

3.1.5

A PERS Audit of the local pedestrian network including routes to key public transport nodes has also been undertaken as part of the Transport Assessment. The PERS Audit study area is outlined in Figure 3-2.

Figure 3-2 PERS Audit Study Area



3.1.6

The PERS Audit was completed in April 2018, reviewing the pedestrian environment surrounding the site. The findings were generally positive, with high quality pavements and provisions at crossing points. A full bus stop audit was completed for stops near the site, with the majority of bus stops having good quality waiting facilities and provision of information. The interchange at Gloucester Road Underground Station was also rated positively.

3.1.7 The full report and results of the audit can be found in Appendix A.

3.2 CYCLING NETWORK

3.2.1

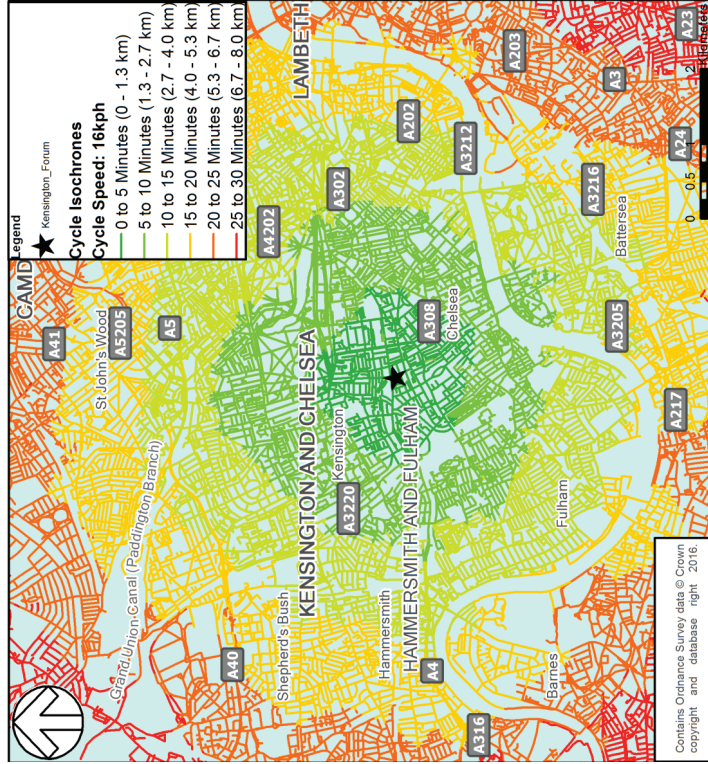
Most streets near the site are lightly trafficked and are suitable for cyclists. Ashburn Place is part of the 'Quietway' cycle network that provides signposted routes on quieter back streets for cyclists travelling at a more relaxed pace. The Quietway route provides a north-south priority cycle only route across Cromwell Road between Ashburn Place and Grenville Place. On Ashburn Place, to assist cyclists travelling northbound, a short cycle lane is provided along the right hand side of the northbound lane at the approach to Cromwell Road.

3.2.2 Associated with the Quietway route, recent improvements have been carried out along Cromwell Road by TfL. Cromwell Road includes on street cycle lanes in both directions with advanced stop lines at the junctions with Ashburn Place and Ashburn Gardens. There is a good level of provision for cycling on the roads immediately surrounding the site, and this connects well to the wider network.

3.2.3 Figure 3-3 illustrates the connectivity of the site by bicycle to surrounding areas by five minute cycle time boundaries at a 16km/h travel speed. A significant area of London is accessible within a 30 minute cycle with many journeys along dedicated and signed routes.

3.2.4 TfL Cycle Hire Docking Stations are located at Gloucester Road Station (150m walk distance, 15 stands) and Emperor's Gate (220m walk distance, 21 stands), both easily accessible from the site.

Figure 3-3 Cycling Isochrones

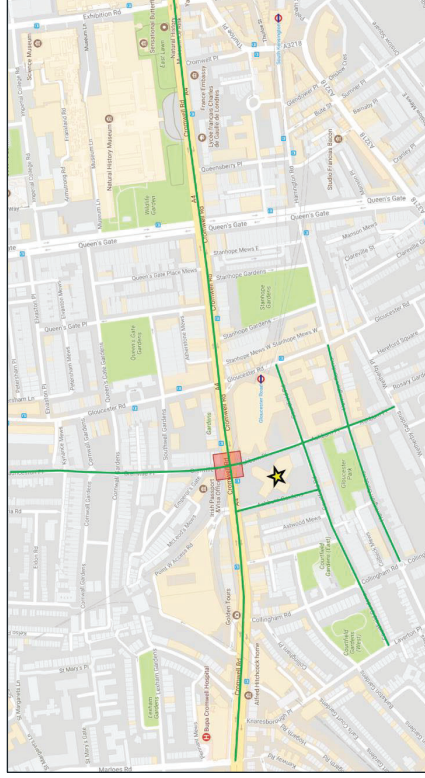


CLOS AUDIT

3.2.5 A Cycling Level of Service (CLOS) Audit has been conducted in order to evaluate the quality of the cycling environment in the vicinity of the development. Links and junctions have been assessed in

accordance with TfL's methodology detailed in the 'London Cycle Design Standards' (2014). The CLOS Audit Scope is outlined in Figure 3-4.

Figure 3-4 CLOS Audit Scope



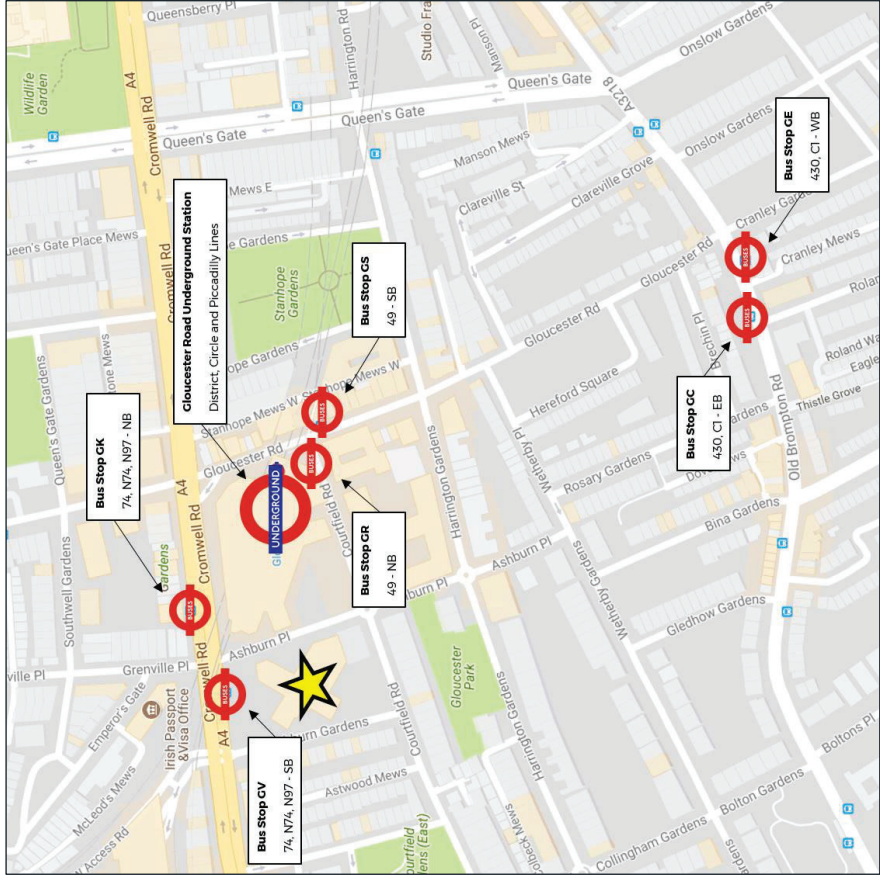
3.2.6 The CLOS Audit was completed on 7th April 2018, reviewing the cycling environment surrounding the site. The findings were generally positive, with good facilities particularly along Ashburn Place and Courtfield Road. The full report and results of the audit can be found in Appendix B.

4 PUBLIC TRANSPORT ACCESSIBILITY

4.1.1

TfL's Web-based Connectivity Assessment Toolkit (WebCAT) shows that the Public Transport Access Level (PTAL) at the site is excellent. The PTAL Accessibility Index score is 37.14, with the site being located in one of the most accessible locations in RBKC (a score of 25+ is categorised as excellent). The full PTAL report is contained within Appendix C. The surrounding public transport services are shown in Figure 4-1.

Figure 4-1 Surrounding Public Transport Services



4.1.2

Bus and London Underground services identified by the PTAL report are set out in Table 4-1 and Table 4-2. The bus stops for bus services 74, N74 and N97 are located on Cromwell Road adjacent to the site. Gloucester Road and Earl's Court stations are located within a 3 minute walk and a 9 minute walk respectively.

Table 4-1 Local Bus Services

Service No.	Bus Stop No.	Route	Direction	Approximate Frequency Service No.	
				AM Peak Hour	PM Peak Hour
49	Stop GR - NB	Clapham Junction - South Kensington - White City	NB	9	9
	Stop GS - SB	Putney - Earl's Court - Baker Street	SB	9	9
74	Stop GK - NB	Putney - Earl's Court - Baker Street	NB	9	7
	Stop GV - SB	Putney - Earl's Court - Baker Street	SB	8	7
430	Stop GC - EB	Rochampton - Putney - South Kensington	EB	8	7
	Stop GE - WB	White City - Earl's Court - Victoria	WB	8	7
C1	Stop GC - EB	White City - Earl's Court - Victoria	EB	6	6
	Stop GE - WB	White City - Earl's Court - Victoria	WB	6	6
N74*	Stop GK - NB	Danebury Avenue / Minstead Gardens - Baker Street Station		2 per hour overnight	
	Stop GV - SB	Danebury Avenue / Minstead Gardens - Baker Street Station		2 per hour overnight	
N97*	Stop GK - NB	Hammersmith Bus Station - Whitehall / Trafalgar Square		2 per hour overnight	
	Stop GV - SB	Hammersmith Bus Station - Whitehall / Trafalgar Square		2 per hour overnight	
All services				54	49

* Night service

Table 4-2 London Underground Services

Underground Line	Route	Approximate Frequency	
		AM Peak Hour	PM Peak Hour
Piccadilly*	Heathrow (westbound)	12	11
	Uxbridge (westbound)	4	7
	Cockfosters (eastbound)	18	18
Circle	Edgware Road (Clockwise)	6	6
District	Edgware Road (Anti-Clockwise)	6	6
	Wimbledon / Ealing Broadway / Richmond (westbound)	21	21
	Barking / Dagenham East / Tower Hill / Upminster (eastbound)	22	21
Total Services		89	90

*The Piccadilly Line operates a 24 hour service with trains running on average every 10 minutes between Cockfosters and Heathrow Terminal 5 on Friday and Saturday nights

4.1.3

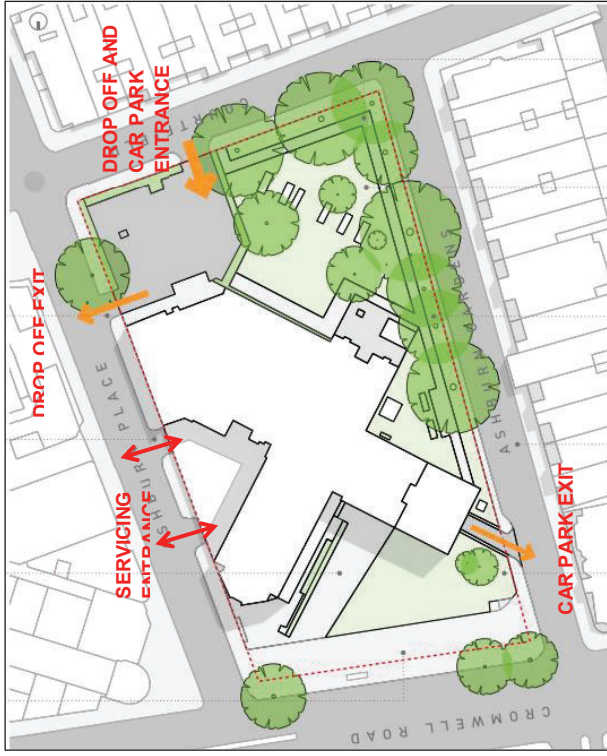
In addition to the London Underground stations that have been identified within the 960m PTAL distance threshold, West Brompton (20 minute walk) station is located near to the site and provides access to the London Overground network.

5 ROAD NETWORK

5.1 EXISTING VEHICLE ACCESS ARRANGEMENT

5.1.1 The existing vehicle access arrangements are summarised within Figure 5-1.

Figure 5-1 Existing Vehicle Access Layout



- 5.1.2 The existing hotel provides a drop-off area to the south of the hotel that accommodates cars, taxis and coaches. The drop-off operates one-way with access from Courfield Road and egress onto Ashburn Place.
- 5.1.3 There is waiting space for three taxis on site within the drop-off area. These spaces are fed by a TfL taxi rank on Courfield Road that accommodates two taxis.
- 5.1.4 A basement car park is also accessed via the drop-off area. The basement car park exit is located to the west of the hotel and egresses onto Ashburn Gardens.
- 5.1.5 Two servicing entrances are located on Ashburn Place. These entrances are not connected internally and servicing vehicles reverse on or off the public highway across the footway to gain access. A survey of servicing activity identified that 15% of vehicles service the building on-street from the kerbside along Ashburn Place.

5.2 LOCAL ROAD NETWORK

CROMWELL ROAD

5.2.1 Cromwell Road is part of the Transport for London Road Network (TLRN) and is a 'Red Route' with parking and loading activity prohibited in certain locations and at specified times. The TLRN and site location is shown in Figure 5-2.

Figure 5-2 TLRN Red Route Network

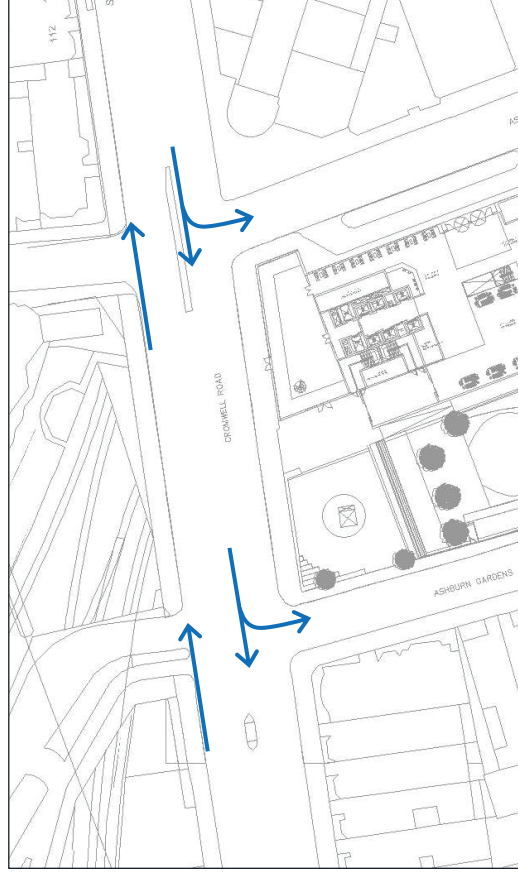


5.2.2 Cromwell Road has signalised junctions with Ashburn Place and Ashburn Gardens at the northeast and northwest of the site respectively:

- The Ashburn Place forms a junction with Grenville Place. For vehicles, turning movements are restricted to left turns only. Cyclists are able to travel straight ahead between Ashburn Place and Grenville Place. Informal pedestrian crossing facilities are provided.
- The Ashburn Gardens junction is a four arms cross roads with the Point West Access forming the northern arm of the junction. Right turning from Cromwell Road into Ashburn Gardens is prohibited. Vehicles are permitted to turn right from Ashburn Gardens onto Cromwell Road.

5.2.3 Figure 5-3 illustrates the permitted vehicular movements from Cromwell Road at the junctions with Ashburn Place and Ashburn Gardens.

Figure 5-3 Cromwell Road Permitted Vehicular Movements



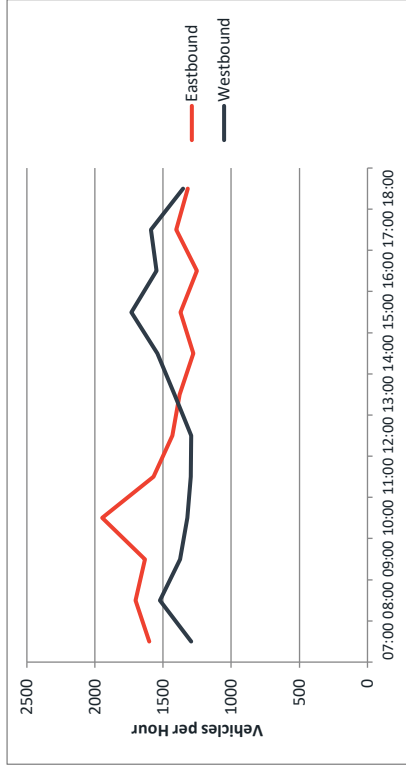
5.2.4

ATC data was collected over one week starting 5th October 2016 to identify traffic volumes along Ashburn Place, Courfield Road and Ashburn Gardens. DfT Traffic Count data has been used to identify traffic along Cromwell Road.

5.2.5

Cromwell Road forms the northern boundary of the site and is a major arterial road with four lanes (two in each direction). A traffic profile has been developed using DfT Traffic Count data and is shown in Figure 5-4. Two-way traffic flows typically exceed 2,800 vehicles per hour between 07:00 and 19:00 with a peak of 3,500 vehicles during the morning. The flows are tidal with slightly higher eastbound flows in the morning and higher westbound flows during the afternoon.

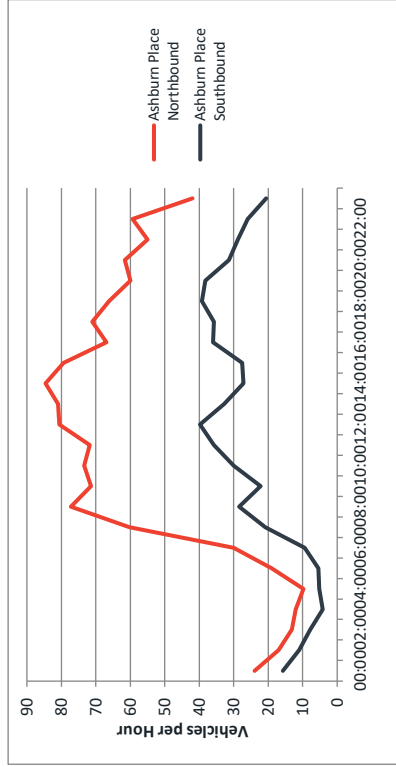
Figure 5-4 Cromwell Road Weekday Traffic Profile



ASHBURN PLACE

5.2.6 Ashburn Place forms the eastern boundary of the site connecting Cromwell Road and Courtfield Road. It is a two-way road with on-street parking on either side of the carriageway. Figure 5-5 shows a weekday daily traffic profile for Ashburn Place. Bi-directional traffic flows are low with a peak of around 120 two-way vehicles per hour. Northbound traffic volume is higher than the southbound volume throughout the day.

Figure 5-5 Ashburn Place Weekday Traffic Profile



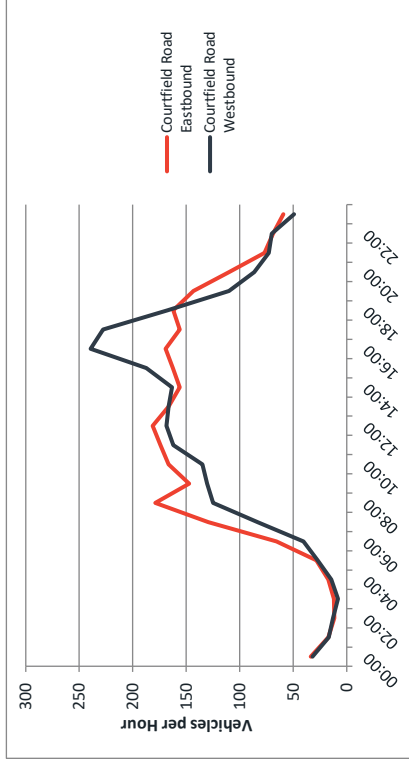
COURTFIELD ROAD

Courtfield Road forms the southern boundary of the site, connecting east-west between Ashburn Place and Ashburn Gardens, parallel to Cromwell Road and provides vehicle access to the existing

5.2.7

hotel development. Traffic flow data is summarised in Figure 5-6. The peak hourly flow is around 400 two-way vehicles recorded in the afternoon.

Figure 5-6 Courtfield Road Weekday Traffic Profile

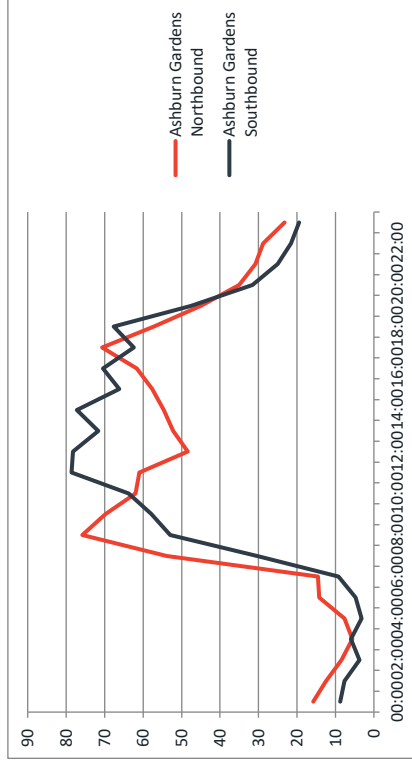


ASHBURN GARDENS

Ashburn Gardens is located to the west of the site, connecting Courtfield Road to Cromwell Road. A weekday traffic profile is shown in Figure 5-7. Traffic flows are low reaching around 140 vehicles per hour (two-way) and there is on-street parking on either side of the carriageway.

5.2.8

Figure 5-7 Ashburn Gardens Weekday Traffic Profile



5.3 PARKING

5.3.1 The existing on street parking provisions along the roads surrounding the site are shown in Figure 5-8. The majority of the on street parking spaces are allocated for pay and display and resident permit parking. The residential parking is restricted to permit holders only Monday-Friday, 8:30am-10pm and Saturday, 8:30am-1:30pm. There is a car club space along Ashburn Place and a rank for taxis along Courtfield Road, which feeds into the hotel drop-off.

Figure 5-8 Existing Street Parking Provisions

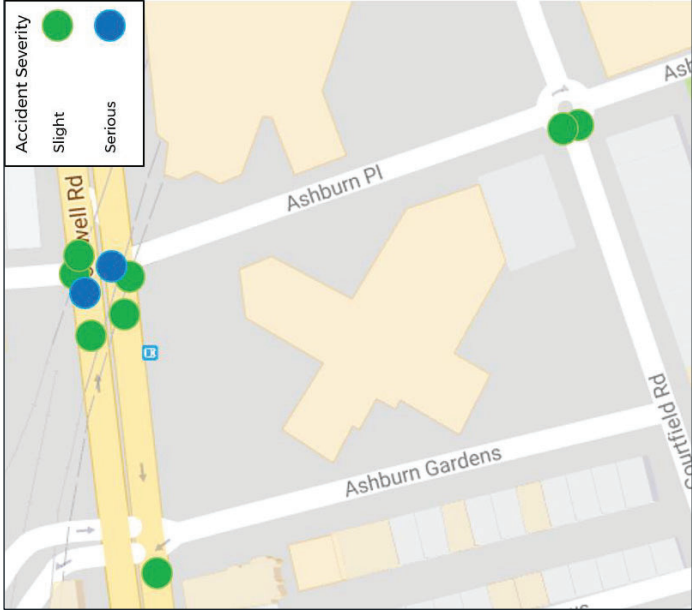


5.4 PERSONAL INJURY ACCIDENT DATA

5.4.1 An analysis of Personal Injury Accident (PIA) data has been carried out to ascertain whether there are any existing road safety issues in the local area which may be exacerbated by the development.

5.4.2 PIA data has been obtained from TfL for the latest available three year period, from 1st June 2014 to 31st May 2017. The data covers the study area shown in Figure 5-9.

Figure 5-9 PIA Data Map



5.4.3 During the period between 1st June 2014 and 31st May 2017 there were a total of 10 recorded PIAs; 8 of these were slight in severity, with 2 serious injuries and no fatal collisions. Table 5-1 details the key results, whilst the full report can be found in Appendix D.

Table 5-1 Summary of PIA Data

Ref.	Location	Description	Severity	VRU	Causal Factors
0114BS70687	Courtfield Road / Ashburn Place	Car and cyclist entered roundabout at same time, cyclist swerved to avoid the car and fell off	Slight	1 Cyclist	Loss of control Failed to look
0116BS70459	Courtfield Road / Ashburn Place	Car entered roundabout and collided with another car that was already crossing the roundabout	Slight	No	Carelessness Failed to look
0114BS70449	Cromwell Road / Grenville Place	Cyclist turned right across a car, causing a collision	Serious	1 Cyclist	Failed to look Blind spot
1160002668	Cromwell Road / Ashburn Place	Unknown	Slight	Unknown	Unknown
1160021156	Cromwell Road / Ashburn Gardens	Car turned right against one-way sign and hit another car	Slight	No	Carelessness Failed to look
0115BS70449	Cromwell Road / Ashburn Place	Pedestrian crossed the road and got hit by car	Slight	1 Pedestrian	Carelessness Failed to look
0115BS70680	Cromwell Road / Ashburn Place	Pedestrian crossed the road into the path of cyclist, causing cyclist to brake suddenly and fall	Slight	1 Pedestrian 1 Cyclist	Carelessness Failed to look
1160002889	Cromwell Road / Grenville Place	Unknown	Serious	Unknown	Unknown
1160008802	Cromwell Road / Grenville Place	Unknown	Slight	Unknown	Unknown
0116BS70065	Cromwell Road / Grenville Place	Car shunted by bicycle which had defective brakes	Slight	1 Cyclist	Poorly maintained bicycle

*VRU stands for Vulnerable Road User e.g. pedestrians, cyclists or motorcyclists

5.4.4 Seven accidents occurred at the junction of Cromwell Road and Ashburn Place / Grenville Place. The cause of three of these accidents is unknown. Two of the PIAs were serious, whilst four involved vulnerable road users.

5.4.5 The review of accident records has identified that the main causal factor of accidents within the vicinity of the site is driver, cyclist or pedestrian error, with no trend in accidents related to current highway design being observed. It is also considered that the development will not adversely contribute to the probability of personal injury accidents occurring within the vicinity of the site.

6 PROPOSED DEVELOPMENT

6.1 INTRODUCTION

6.1.1 This section details the access, servicing and parking strategy associated with the proposed development.

6.1.2 The proposed development offers upper-tier hotel facilities including serviced apartments. Permission is also sought for 62 affordable residential dwellings. The new layout is designed to reinstate a garden square at the southwest of the site, improving the surrounding environment and realm.

6.1.3 The proposed development is located at the east of the site and provides frontage along Cromwell Road, Ashburn Place and Courtfield Road.

6.2 PROPOSALS

6.2.1 The existing Kensington Forum hotel is operated by the Holiday Inn hotel chain and provides 906 bedrooms including retail, restaurants, meeting rooms and conferencing facilities. The proposed development would replace the existing hotel with a new higher-end hotel with 1,089 keys (749 hotel keys as well as 340 serviced apartments) and associated function/conference space, meeting rooms and restaurants as well as and 62 residential units.

6.2.2 The existing building has a basement car park with circa 100 parking spaces and the proposed development would include a total provision of 48 car parking spaces for both the hotel and residential uses. The proposed scheme is therefore of comparable scale to the existing use at the site and will reduce car parking.

6.2.3 It is proposed that the existing building (906 bedroom hotel with meeting rooms and restaurants) will be demolished and replaced with a hotel/residential use development. The existing basement would be retained with some extensions.

6.2.4 The development schedule of the proposed development is outlined in Table 6-1.

Table 6-1 Proposed Development Schedule

Land Use	Development Quantum
C1 Hotel	749 bedrooms
C1 Serviced Apartments	340 apartments
C3 Residential Dwellings	62 dwellings

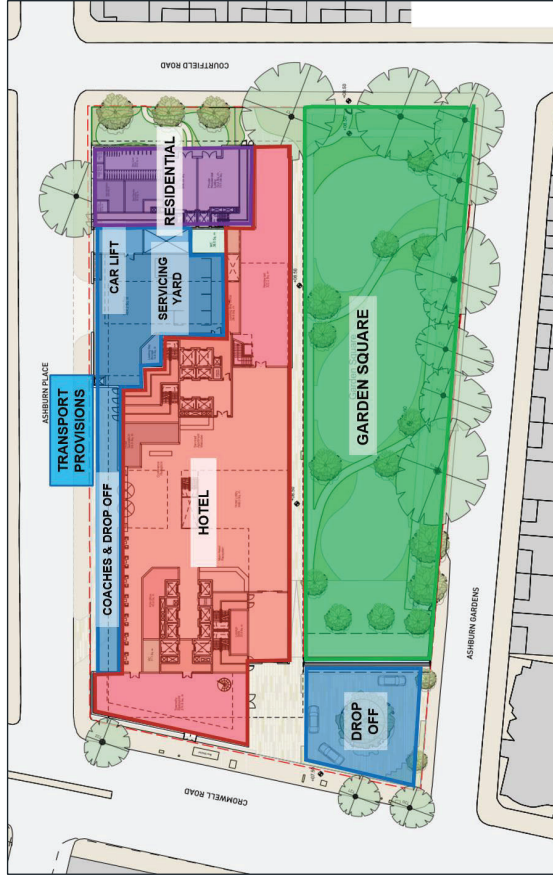
6.2.5 The hotel will also provide a number of ancillary uses including gym, meeting rooms and restaurant and a function space that could host up to 1,200 / 1,500 guests at an event depending on the set up.

6.3 PROPOSED LAYOUT

6.3.1 The proposed development reconfigures the existing and fragmented garden square to form a single rectilinear space. The garden square will be an accessible public space at the southwest of the site with new pedestrian routes connecting to the wider pedestrian network.

- 6.3.2 It is proposed to locate the development buildings to front the garden square and also provide frontage at both Cromwell Road and Courtfield Road.
- 6.3.3 The site layout is illustrated within Figure 6-1.
- 6.3.4 The proposed development will need to accommodate various transport requirements on site which will require access to be gained from the public highway. This includes access to car parking in the basement, access to a servicing yard and access for vehicles (cars, coaches and taxis) dropping-off and picking-up guests.

Figure 6-1 Proposed Development Indicative Ground Floor Layout

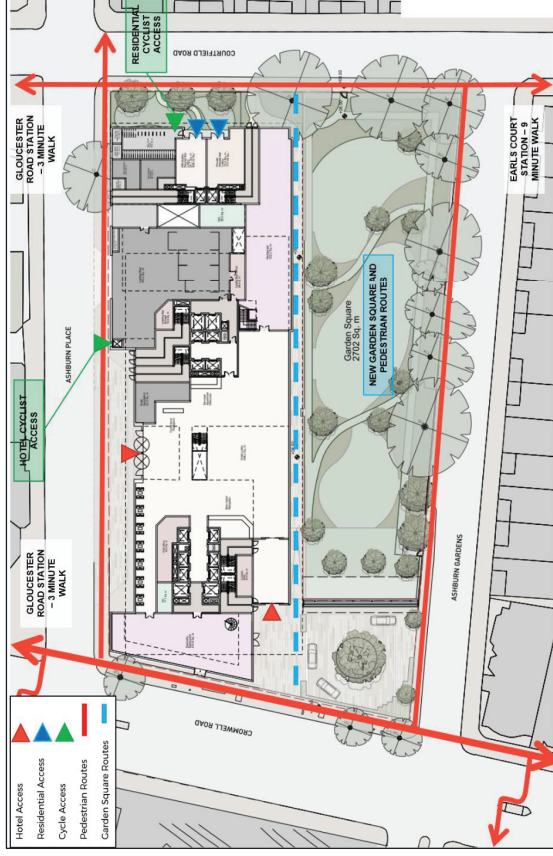


6.4 PROPOSED PEDESTRIAN AND CYCLIST ACCESS

PEDESTRIAN ACCESS

- 6.4.1 There would be several pedestrian entrances to the buildings with separate accesses to the hotel and residential parts of the development that provide convenient access from different directions.
- 6.4.2 New pedestrian routes are provided through and alongside the garden square improving permeability and connectivity to the wider pedestrian network, as illustrated in Figure 6-2.
- 6.4.3 The development would open up the garden square as a public space for pedestrian movement and activity.
- 6.4.4 The provision of a new pedestrian route through the site as well as the garden square offers an improvement to the existing pedestrian network.

Figure 6-2 Proposed Pedestrian and Cycle Access



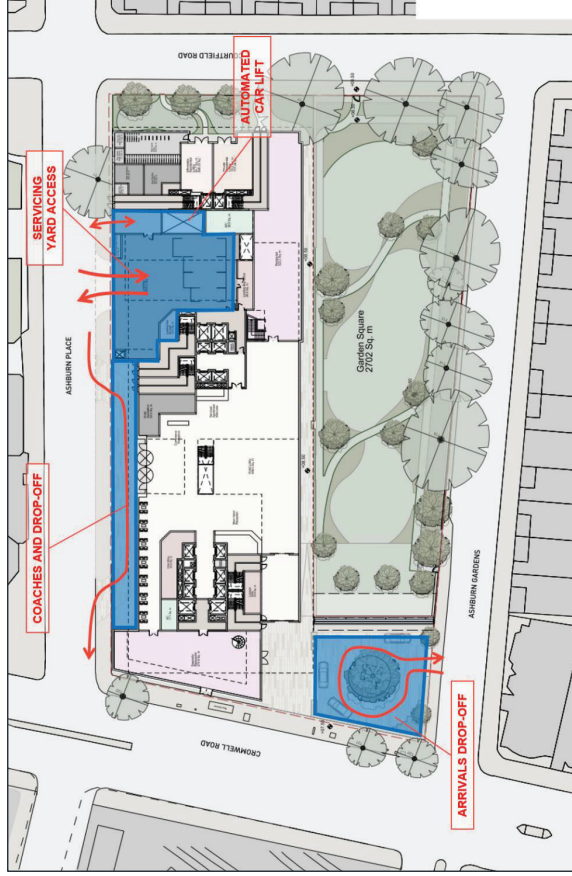
- 6.4.5 The existing building is set further back from the kerbline on Cromwell Road in comparison to neighbouring properties. This is due to a historic road widening scheme for which land was safeguarded by the current hotel design. It should be noted that this has not been implemented. As such, the existing footway along Cromwell Road outside the site is very wide and currently extends into the red line boundary of the site.
- 6.4.6 As part of the development it is proposed to re-provide some of the land within the red line boundary as footway for pedestrians, whilst also bringing the front of the development further in line with the building frontage along the rest of Cromwell Road.
- 6.4.7 A footway will be provided along Cromwell Road alongside the proposed building perimeter, providing comfortable conditions for pedestrians. This will be ascertained through LoS calculations following TfL guidelines.
- 6.4.8 The main access to the hotel, serviced apartments and ancillary facilities will be via:
- Ashburn Place through the main reception;
 - Cromwell Road and Ashburn Gardens through the shared space in proximity of the drop-off.
- Access to residential dwellings will be provided from Courtfield Road.
- CYCLIST ACCESS**
- 6.4.9 Access to the surrounding cycle network will be provided via Ashburn Place, which is part of the Quietway network. Residential and hotel employee cycle parking will be provided separately on site, within the building, and will be accessed via dedicated entrances. Employee parking will be provided at basement level, accessed via cycle lifts, and residential parking will be provided at ground level from Courtfield Road.

6.4.10 Visitors cycle stands will be integrated within the public realm.

6.5 PROPOSED VEHICLE ACCESS

6.5.1 The following section describes the development access strategy for each vehicle activity. The vehicle demand forecasts that inform the spatial design of these areas are included in Section 7. The vehicle access locations and functions are demonstrated in Figure 6-3.

Figure 6-3 Proposed Vehicle Access



CAR PARKING ACCESS

6.5.2 An automated parking system is provided within the basement with access via a car lift from Ashburn Place. The parking spaces are provided for both the residential and commercial elements of the site. The lift specification will include a recommendation to prioritise incoming vehicles.

SERVICING ACCESS

6.5.3 A servicing yard is provided at the east of the building, accessed from Ashburn Place. The proposed arrangement enables all vehicles to travel in a forward gear when accessing and egressing the site. The current building is also accessed from Ashburn Place, but has two crossovers and requires vehicles to reverse on and off the public highway. The proposed arrangement therefore improves road safety along Ashburn Place.

COACH ACCESS

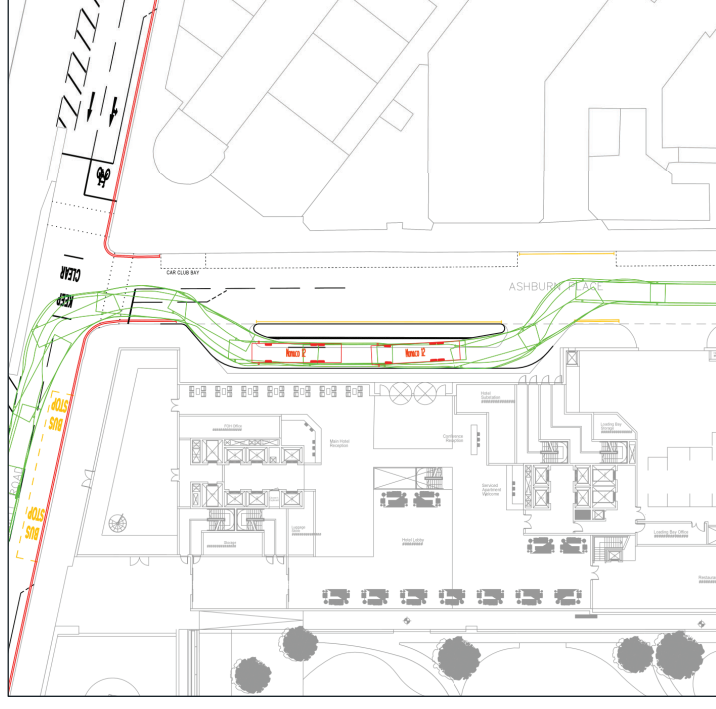
6.5.4 A coach drop-off facility is provided on site accessed via Ashburn Place. Due to the significant space required to turn coaches within the site, a parallel drop-off arrangement is proposed. The parallel

lay-by will ensure that coaches are off the public highway while optimising the arrival experience for the hotel's guests.

6.5.5 The coach drop-off is accessed and egressed via Ashburn Place, which is lightly trafficked. The coach drop-off would operate one-way northbound. The arrangement allows coaches to drop-off and pick-up from the hotel entrance and can accommodate two 12m coaches. Based on a survey of a comparable site (the Park Plaza, Westminster) the vast majority of coaches are expected to be 12m or less, and would be accommodated on site.

6.5.6 Figure 6-4 below demonstrates the proposed coach drop off operations.

Figure 6-4 Coach Drop-off Swept Paths



TAXI DROP-OFF AND PICK-UP

6.5.7 The hotel, ancillary and retail uses will generate taxi trips throughout the day. It is proposed to use the area at the northwest of the site to accommodate car and taxi drop-off and pick-up. The drop-off would be a pedestrian friendly shared space using high quality surfacing materials. Access would be taken via Ashburn Gardens to the south of Cromwell Road as illustrated in Figure 6-5. The event pick-up arrangement is demonstrated in Figure 6-6. This will reduce the likelihood of traffic making

- U-turns along Cromwell Road back towards Central London compared to the existing drop-off arrangement. Currently vehicles are required to depart westbound along Cromwell Road from Ashburn Place, whilst the proposed drop-off at Ashburn Gardens will enable vehicles to turn right and head east onto Cromwell Road.
- 6.5.8 It is proposed to relocate the two existing taxi rank spaces on Courtfield Road to Ashburn Gardens, and also provide one additional on street taxi space.
- 6.5.9 In the event of high drop-off demand, such as before and after evening events, the coach facility will be used for drop-off and pickup, as demonstrated in Figure 6-7.
- 6.5.10 Following events, management will direct guests to specific areas for pick-up. Staff will be situated at both drop-offs to ensure that guest departure is managed appropriately and efficiently.
- 6.5.11 The proposed drop-off facilities have been assessed against the peak drop-off generation. Details are provided within the accompanying Coach and Taxi Management Plan.

Figure 6-5 Drop-Off Access via Ashburn Gardens for everyday activities

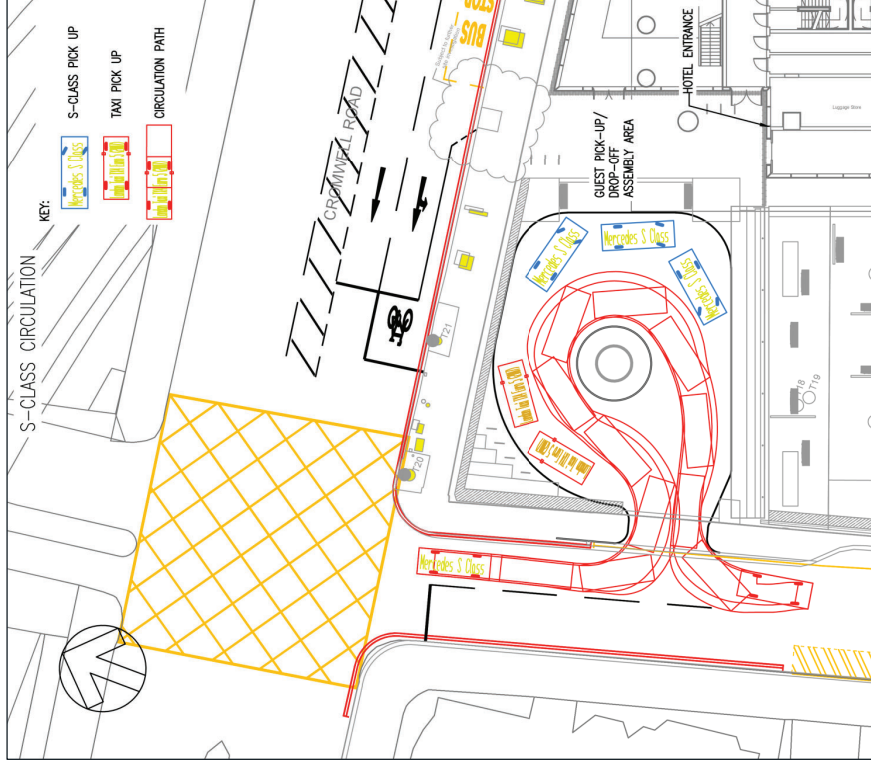


Figure 6-6 Event Drop-Off Access via Ashburn Gardens

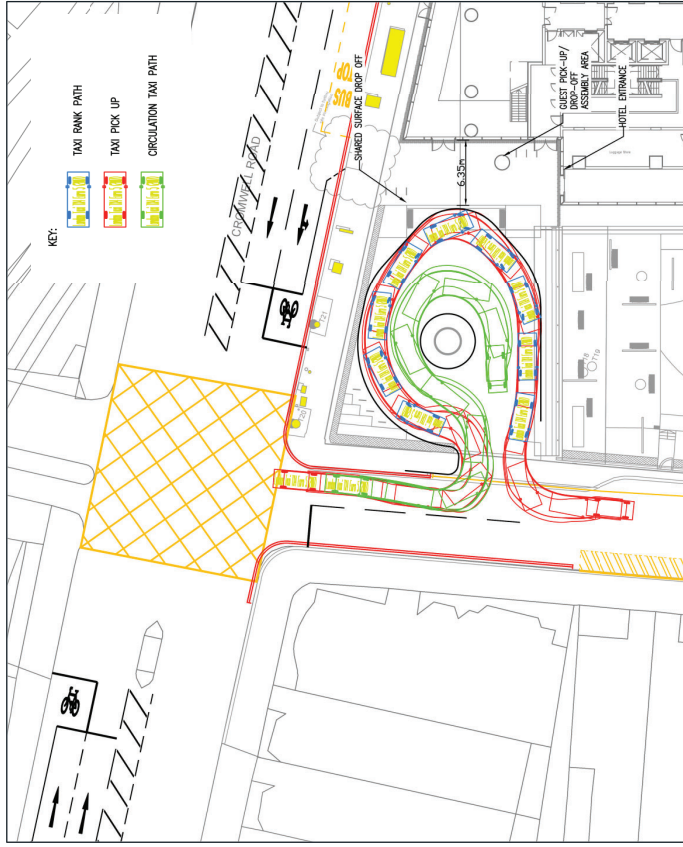
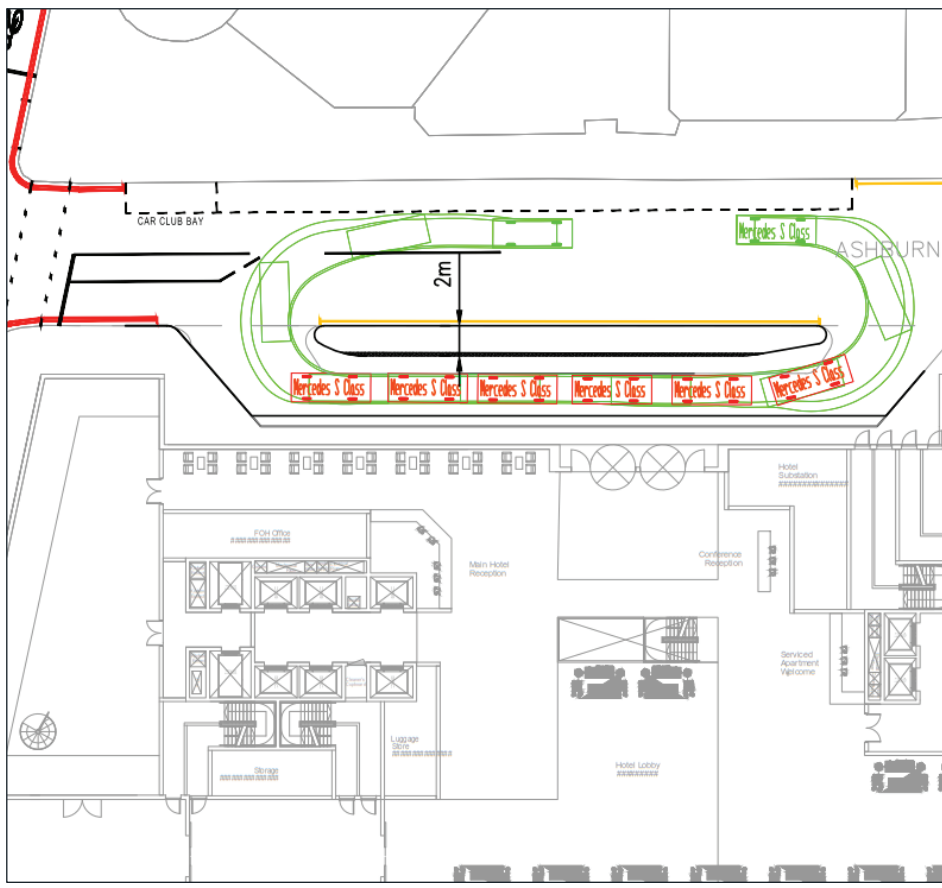


Figure 6-7 Event Drop-Off Access via Ashburn Place

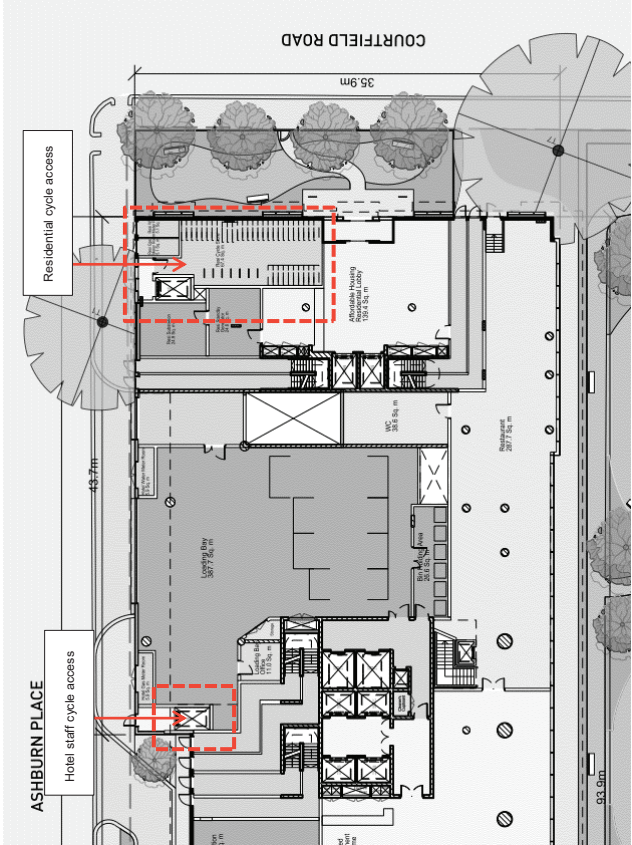


6.6

PARKING
CYCLE PARKING

6.6.1 Figure 6-8 shows the proposed cycle parking access locations.

Figure 6-8 Proposed Cycle Parking



6.6.2 Cycle parking would be provided in accordance with the Draft London Plan standards including accessible stands. The cycle parking provision at the proposed development is summarised in Table 6-3.

Table 6-3 Cycle Parking Provision

Land Use	Long-Stay Cycle Parking	Short-Stay Cycle Parking
C3 Residential Dwellings: Studio and 1 bedroom (1 person) units	6	2
C3 Residential Dwellings: 1 bedroom (2 person) units	29	
C3 Residential Dwellings: 2+ bedroom units	74	
C1 Hotel	55	22
Total	164	24

6.6.3 It should be noted that serviced apartments fall into the C1 hotel land use class as they are occupied by temporary guests.

6.6.4 Long stay cycle parking will be provided within the ground floor for the residential residential units, and it will include 87 2-tier Josta spaces and 22 accessible sheffield spaces. For the hotel, long stay cycle spaces are accessed via lift and are located at mezzanine level. Access to cycle parking is shown in Figure 6-6.

6.6.5 Following discussions with TfL, 20% of residential spaces will be in the form of Sheffield stands and 80% in the form of two-tier stands. For staff spaces, 10% will be in the form of Sheffield stands and 90% in the form of two-tier stands. Showers and changing facilities would be provided within the basement for employees.

6.6.6 Short stay (visitor) cycle parking spaces would be provided within the public realm surrounding the building in the form of Sheffield stands. Each stand provides parking for two bicycles.

CAR PARKING

6.6.7 Car parking would be provided in accordance with RBKC maximum car parking standards. Table 6-4 outlines the car parking provision.

Table 6-4 Proposed Car Parking Provision

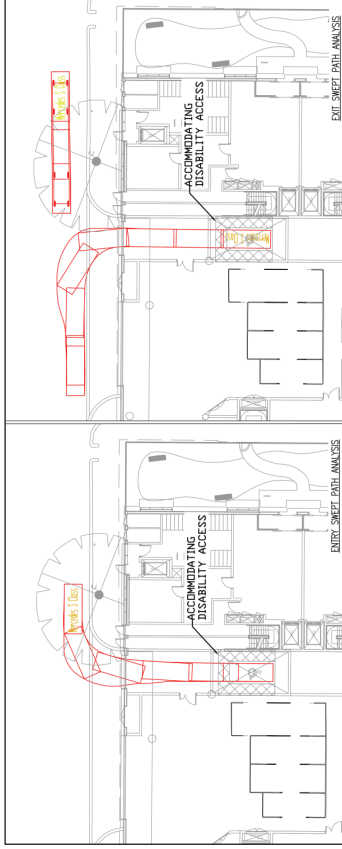
Land Use	Parking Standard	Parking Provision	Development Quantum	No. of Parking Spaces
C3 Residential Dwellings	0.50 per flat	0.37 per flat	62 dwellings	23
C1 Hotel	1 per 40 bedrooms	1 per 40 bedrooms	1,089 bedrooms	25

6.6.8 The parking provision for the scheme complies with RBKC standards, and is provided for both the residential and commercial elements of the site.

6.6.9 The car park will be provided within an automated stacker in the basement, accessed via a car lift from Ashburn Place to the south of the servicing yard. Electric car charging facilities will be provided

within the automated stacker in line with London Plan standards and the parking spaces and lift cabin will be accessible for blue badge users. Figure 6-9 details the car lift access.

Figure 6-9 Car Lift Access



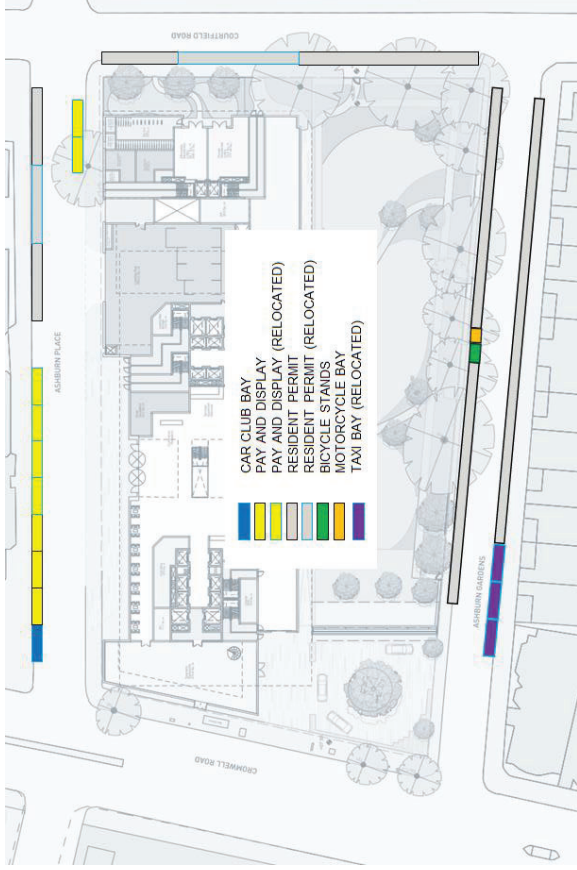
6.6.10 In residential developments at least one space, or ten per cent, whichever is the greater, should be provided for Blue / Purple Badge holders. Disabled parking would not be marked out as it will be provided within an automated parking system. Car parking for blue badge users would be reserved within the automated stacker. The car park access will provide sufficient space around the parking platform pallets to enable a wheelchair user to access.

6.6.11 Residents would not be eligible for on-street resident parking permits.

6.7 ON STREET CAR PARKING

6.7.1 As a result of the rearrangement of the vehicle accesses, some on street car parking bays would be relocated. The proposed on-street parking provisions are shown in Figure 6-10. The scheme would not result in any reduction to the number of existing pay and display and resident permit spaces. The proposed on street parking re-location will not impact access to the surrounding properties, and all the pay and display and residential permit spaces will be relocated along Ashburn Place.

Figure 6-10 Proposed On-Street Parking Provisions



6.8 SERVICING

6.8.1 The design and size of the proposed servicing yard has been informed by a detailed assessment of forecast servicing demand, as outlined in Section 7.

6.8.2 The servicing yard will be accessed via Ashburn Place. Refuse collection will be undertaken from the servicing yard.

6.8.3 The existing hotel provides two separate service accesses on Ashburn Place that requires vehicles to reverse in from the public highway. Servicing for the existing building also takes place on street.

6.8.4 The proposed servicing arrangements would be a significant improvement to the existing servicing arrangements, accommodating all servicing on site with vehicles entering and exiting the site in forward gear.

6.8.5 The servicing yard would provide four servicing bays, informed by an assessment of demand.

Vehicle tracking is shown on Figure 6-11 and Figure 6-12.