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PELHAM RESIDENTS ASSOCIATION,
THURLOE OWNERS AND LEASEHOLDERS ASSOCIATION, AND
THE ONSLOW NEIGHBOURHOOD ASSOCIATION

PROPOSED WELLCOME TRUST DEVELOPMENT
AT 63-81 PELHAM STREET, LONDON SW7 2NJ

INDEPENDENT TRANSPORT, DELIVERY & SERVICING AUDIT

March 2021

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0.0 EXECUTIVE SUMMARY

- 0.1 The development proposal seeks to demolish the existing building and build another one to provide office use of 9,823sqm (GIA) (excluding plant and ancillary space). With the retained gym use within the basement, the development will deliver a total of 10,647sqm (GIA), an increase of 5,190sqm (GIA) from the existing site
- 0.2 The proposed reduction in the carriageway width to accommodate new loading bays will result in the potential for conflict between buses and other large goods vehicle and other road uses, cyclists and pedestrians.
- 0.3 The applicant has underestimated the number of 'total person' trips and delivery / servicing trips the proposed development will generate which could lead to delivery / servicing activity that causes congestion and delay to bus services.
- 0.4 The applicant has presented two differing assessments of the number of servicing trips the development could generate, which could lead to delivery / servicing activity on the adjacent carriageway that causes congestion and delay to bus services.
- 0.5 The total amount of waste the development could generate has been significantly underestimated resulting in greater impact on the footway adjacent to the site.
- 0.6 Construction vehicles accessing Pelham Street from Old Brompton Road will lead to conflict with other road users.
- 0.7 The applicant has not demonstrated that demolition / construction vehicles can manoeuvre in and out of the hoarding line area without conflict with other road users.
- 0.8 As a result of the above, the proposal would have a detrimental impact on local amenity and safety.

I.0 INTRODUCTION

I.1 Paul Mew Associates have been appointed by the Pelham Residents Association, the Thurloe Owners and Leaseholders Association and the Onslow Neighbourhood Association to carry out an independent audit of the transport implications of the proposed Wellcome Trust development at 63-81 Pelham Street, London, SW7 2NJ.

I.2 The proposed development, submitted to the Royal Borough of Kensington and Chelsea under Planning Ref: PP/21/00471 is for;

Demolition of building to basement level and construction of part two storey, part ground plus five story office building with gym use at basement level, associated bin storage, cycle parking, plant and other ancillary works.

I.3 The development proposal seeks to demolish the existing building and build another one to provide office use of 9,823sqm (GIA) (excluding plant and ancillary space). With the retained gym use within the basement, the development will deliver a total of 10,647sqm (GIA), an increase of 5,190sqm (GIA) from the existing site. The proposed development will be accessed from Pelham Street

I.4 The application for the proposed development at Nos. 63-81 Pelham Street needs to be considered in the context of outstanding applications from Native Land/TfL at South Kensington Station, the Wellcome Trust at No. 40 Pelham Street as well as other local developments such as The Clearings on Draycott Avenue which would, individually and collectively, severely exacerbate the consequences of the unsatisfactory servicing/delivery arrangements for the proposed development at Nos. 63-81.

I.5 This Independent Transport, Delivery & Servicing Audit has examined the Transport Assessment, Outline Delivery & Servicing Plan, Waste Management Strategy and Construction Traffic Management Plan prepared by Velocity Transport Planning Ltd in support of the application.

2.0 TRANSPORT ASSESSMENT

- 2.1 This chapter assesses the Transport Assessment prepared by Velocity Transport Planning Ltd in support of the application.

Introduction

- 2.2 The introduction includes details of the consultation process carried out by the applicant. As part of this consultation process the applicant carried out direct consultation with local residents' associations and amenity groups via focus groups, targeted meetings, online webinars, leafleting, questionnaire, online feedback and an information line.
- 2.3 While the Transport Assessment details the process of public consultation, it does not include the results of the consultation. As such, residents' comments are not included and hence, it is not clear how, or if, the evolution of the proposals has addressed these concerns.

Policy Review

- 2.4 Chapter 2 of the Transport Assessment presents a review of relevant planning policy and with respect to the London Plan and the Mayor's Transport Strategy, how the proposed development complies.
- 2.5 With regards to servicing, Local Plan Policy CR7 is quoted which requires on-site servicing space but goes on to set out that where developments cannot provide on-site servicing space, it must be demonstrated that the proposal can function satisfactorily without giving rise to adverse effects on traffic congestion, pedestrian safety, residential amenity or impact on bus routes. The Transport Assessment includes a brief audit of proposed servicing, while a standalone Outline Delivery & Servicing Plan provides further details. The Outline Delivery & Servicing Plan is assessed in the following chapter.

Local Highway Network

- 2.6 Para 3.2.3 of the Transport Assessment states that;

To the front of the site, Pelham Street has double yellow line waiting restrictions and loading restrictions in place, which operate from Monday to Friday between 08:30 to 09:30 and 16:30 to 18:30. On the opposite side of the carriageway on-street Pay and Display parking bays and on-street motorcycle parking is provided.'

- 2.7 This is incorrect. The Pay and Display parking bays and motorcycle parking are to the front of the site, with the double yellow line restrictions on the opposite side of the carriageway.
- 2.8 Para 3.2.4 states that;

Pelham Street has three pedestrian crossings: two signalised crossings at each end of the street (i.e. east and west) and a zebra crossing provided to the west of the priority junction with Thurloe Square and Pelham Place.'

- 2.9 Again, this is incorrect. There are no signalised pedestrian crossings on Pelham Street. To the east, at the signalised junction of Pelham Street with Brompton Road, Fulham Road and Sloane Avenue, formal signalised pedestrian crossing facilities are only provided on the Brompton Road arm of the junction. There are no signals at the western end of Pelham Street.
- 2.10 It is questioned why the applicant has included detailed information on Onslow Square which is some distance from the application site.
- 2.11 With regards current loading restrictions. Para 3.4.1 states that to the front of the site single yellow line waiting restrictions and loading restrictions are provided on both sides of the street. In actual fact most of the site frontage is taken up with Pay & Display parking bays with double yellow line waiting restrictions. Figure 3.4 shows regulations on Pelham Street to the east of the site and not directly outside the site.
- 2.12 Para 3.5.2 sets out that parking surveys were carried out in line with the industry standard Lambeth Methodology which requires parking 'lengths' to be assessed at 5.0m, but the applicant has incorrectly assumed a parking 'length' of 5.5m. Erroneous information from the consultants fee proposal are included at bullet point 3. No information is given as to why parking surveys have been carried out or the dates on which parking surveys were conducted.
- 2.13 Para 3.5.10 details the results of parking surveys on the Pay & Display bays adjacent to the site, citing 8 spaces. The applicant has previously detailed this facility providing 7 spaces (Para 3.3.2).
- 2.14 Automatic traffic count surveys were carried out at two locations on Pelham Street as part of the study. It is noted that these were conducted from 18th to 24th March 2020 – in the immediate run up to the first National Covid-19 lockdown which came in to effect on 23rd March 2020. During the surveyed period schools, pubs, cinemas, nightclubs, theatres, gyms and leisure centres had already closed. The use of survey data from this period would not be considered to represent typical activity. As above, no dates are shown for when the parking surveys were carried out so it is not possible to ascertain if these too would have been impacted by Covid-19 restrictions.

Site Accessibility

- 2.15 The figures in Section 4.5 showing the results of the pedestrian flows surveys are illegible and Tables 4.1 and 4.2 which present the results of the pedestrian level of comfort analysis do not identify the locations of the assessments. It is noted that in Tables 4.1 and 4.2 the clear footway widths on Pelham Street are detailed at up to 4.1m in width. Para 4.3.3 sets out that footways within the vicinity of the site are provided on both sides of Pelham Street and are approximately 1.5 to

1.8m in width. The lack of clarity makes it impossible to assess the validity of the findings presented.

- 2.16 An error in Table 4.5 suggests that total passenger numbers for all Underground services at South Kensington Station are in fact just the passenger numbers for westbound District line services.

Proposed Development

- 2.17 The current carriageway adjacent to the site is around 8.0m in width. Allowing for a 2.0m wide area for parking on the north side, the remaining current carriageway width for through traffic is around 6.0m. Within the Proposed Development section, it is set out that servicing of the development is to be carried out from on-street with the amendment to parking provision on the north side of Pelham Street to provide 2 loading bays, Pay & Display bays and motorcycle parking. This will lead to the reduction of the carriageway width for through traffic to 5.5m – a reduction in through traffic width of 0.5m compared to the current situation.
- 2.18 Manual for Streets (DfT 2007) at Para 6.5.7 sets out that streets on bus routes should not generally be less than 6.0 m wide. As such the proposed carriageway narrowing is likely to cause problems for bus operations.
- 2.19 Figure 7.4 of the Transport Assessment shows swept path analysis for a goods vehicle entering the proposed loading bay and 2 vehicles passing adjacent to the loading bay. It also suggests that there would be insufficient width for 2 buses to pass one another.
- 2.20 This problem was identified in the Stage I Road Safety Audit (Appendix E) which set out that:

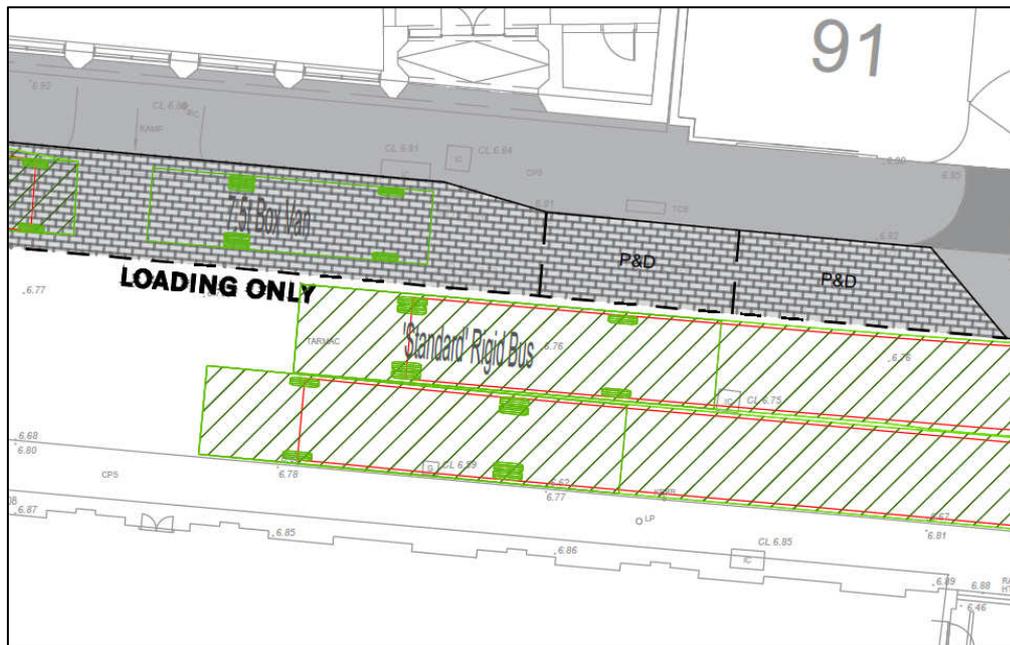
The northern footway is being widened to accommodate shared use parking / loading bays. However, the width of the carriageway at this point is being narrowed to 5.5m and there is a two-way local bus service with a frequency of every 12 minutes. Swept paths of buses were provided for assessment, where the margin for error is minimal, which could lead to vehicle incursion into shared use parking / loading bays, the opposing running lane or collisions with pedestrians on the southern footway.

Large vehicle incursion into shared use parking / loading bays could lead to collisions with parked vehicles or vehicle to pedestrian collisions, whilst incursion into the opposing running lane could lead to side swipe collisions.

It is recommended that the northern footway width should be reduced, allowing the carriageway width to be widened thereby increasing the margin of error for passing buses and other large vehicles.

- 2.21 The applicant has not provided a 'designer's response' to the problems raised in the Safety Audit and no amendments to the layout appear to have been made.

- 2.22 An extract of the swept path analysis presented as part of the submission is shown below and illustrates that there would be insufficient space for 2 buses to pass. Loading Bay / Carriageway Width Issue



Source: Submitted DSP

Existing & Future Travel Demand

- 2.23 Chapter 8 of the Transport Assessment sets out trip generations for the current and proposed development in terms of 'total person' trips and delivery / servicing trips.
- 2.24 These are based on assessments from the TRICS database, which is the industry standard database for forecasting trip generations for new development and is made up of surveys from over 7,000 locations and covering 100 different land use categories.
- 2.25 A total of 4 TRICS sites have been used by the applicant's transport consultant, but upon checking the TRICS database with the same criteria as used in the Outline Delivery & Servicing Plan (office sites in PTAL 5+ locations from 2017 onwards) it was found there are 6 sites which qualify. It is questioned why the 6 applicable sites have not been used. It is noted with regards delivery and servicing that at one of the 6 sites did not include delivery and servicing surveys.
- 2.26 In lieu of this, we have carried out analysis of the 6 applicable TRICS sites for 'total person' trip generations, and the 5 applicable TRICS sites for delivery and servicing trip generations.
- 2.27 The Transport Assessment cites a 'total person' trip rate of 20.518 trips per 100sqm of floor area. With 9,823sqm of office space proposed, this would suggest 2,015 'total person' trips per day. If the 6 applicable TRICS sites are used a trip rate of 22.030 trips per 100sqm of floor area is shown. This would suggest the proposed office space would generate 2,164 'total person' trips per day.

2.28 With regard delivery and servicing trip generations, the applicant has suggested a servicing trip rate of 0.32 servicing trips per 100sqm of floor area. As can be seen from the assessment of the 5 applicable TRICS sites for delivery and servicing trip generations, the true TRICS trip rate is 1.09 servicing trips per 100sqm of floor area.

Table 1. TRICS Sites Assessment – Servicing & Delivery Trips

TRICS Site	Floor Area (sqm)	No. Surveyed Trips				Resulting Servicing Trip Rate Per 100sqm			
		OGV I&2	LGV	Car	All Vehicles	OGV I&2	LGV	Car	All Vehicles
CN02A03	26639	14	12	96	122	0.053	0.045	0.360	0.458
HM02A01	2036	0	0	0	0	0.000	0.000	0.000	0.000
KN02A01	2255	0	6	23	29	0.000	0.266	1.020	1.286
TH02A01	7049	0	26	14	40	0.000	0.369	0.199	0.567
LB02A01	10200	8	130	83	221	0.078	1.275	0.814	2.167
Total	37979	22	174	216	412	0.058	0.458	0.569	1.085
Split		5%	42%	52%	100%	5%	42%	52%	100%

Source: TRICS Database

2.29 On this basis the proposed development could be expected to generate 107 servicing trips per day (made up of 6 OGVs I&2, 45 LGVs and 56 cars). This compares to the applicant's significantly lower forecast of 32 servicing trips per day.

2.30 By way of explanation; OGV I&2 (Other Goods Vehicles 1 defined as all rigid goods vehicle over 3.5 tonne gross weight and 2 or 3 axles and includes box vans and similar large vans, while Other Goods Vehicles 2 defined as rigid goods vehicles with four or more axles and all articulated vehicles). LGVs are Light Goods Vans.

2.31 The Transport Assessment goes on to set out that based on an average dwell time of 12 minutes 36 seconds, the proposed loading bay would be able to accommodate 48 delivery / servicing vehicles over a 6 hour period from 10:00 to 16:00. As set out above, the true level of servicing trip generation could be 107 trips per day, made by 54 delivery / servicing vehicles. This would mean that both proposed loading bays would be in use 100% of the time and there would still be unmet demand. It also assumes that delivery / servicing vehicles would arrive / leave at exact times so that no overlap between delivery / servicing vehicles occurs. In reality it is likely that multiple delivery / servicing vehicles will arrive at the same time leading to the possibility of delivery / servicing vehicles additionally parking on-street (outside the proposed loading bays) and thus causing congestion and delays to bus services.

2.32 The Transport Assessment presents a summary of trip generation taking in to account the proposed development at No.40 Pelham Street (PP/21/00457) suggesting a total trip generation of 36 delivery and servicing trips per day for both sites combined. This contrasts with assessments carried out as part of this audit and a similar audit of the No.40 Pelham Street of 121 delivery and servicing trips per day.

Summary

- 2.33 In summary, the Transport Assessment submitted contains a significant number of errors and omissions which erodes confidence in how the document was formulated and the findings / recommendations it presents.
- 2.34 The proposed reduction in the carriageway width to accommodate new loading bays will result in the potential for conflict between buses and other large goods vehicle and other road uses, cyclists and pedestrians. This issue was raised as part of the Stage I Safety Audit but no proposed solution is presented.
- 2.35 The applicant has underestimated the number of 'total person' trips and delivery / servicing trips the proposed development will generate. The capacity of the proposed loading bay falls short of expected demand which could lead to delivery / servicing activity that causes congestion and delay to bus services.

3.0 OUTLINE DELIVERY & SERVICING PLAN

3.1 In the 'Scope of Plan' section of the Outline Delivery & Servicing Plan it is set out that the;

DSP aims to ensure that servicing at the development can be carried out sustainably and efficiently. The aspiration of this is to achieve wider benefits for the local highway network including contributing towards a reduction in congestion and the environmental and improved road safety conditions.

3.2 In the 'Planning Policy' section, extracts from relevant planning policy documents have been provided including;

- The London Plan Intend to Publish Version, 2019: Policy T7 (f) (Freight and servicing) notes that development proposals should *facilitate sustainable freight and servicing, including through the provision of adequate space for servicing and deliveries off-street*
- Transport for London's DSP Guidance which includes requirements to manage deliveries in terms of location and time of day, reviewing supply chain operations to reduce / minimise frequencies, working with suppliers to use low / no emissions vehicles
- RBK&C Local Plan 2019, Policy CR7 of which requires that servicing does not hinder the local road network, give rise to traffic congestion, conflict with pedestrians or be detrimental to residential amenity. To this end the Local Plan requires on-site servicing and where this is not possible to demonstrate that proposals can function satisfactorily without giving rise to adverse effects on traffic congestion, pedestrian safety, residential amenity or impact on bus routes.
- RBK&C Transport and Streets Supplementary Planning Document (2016) which states that servicing facilities should be designed and managed to avoid undue impacts on highway users, the streetscape or neighbour amenity, while being effective in satisfying developments' servicing needs.

3.3 It is noted that the new London Plan (March 2021) supersedes the Intend to Publish Version cited by the applicant. Policy T7 (G & H) Deliveries, Servicing and Construction of the new London Plan now sets out that:

G. Development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. 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.

H. Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.

3.4 The Aims and Objectives section of the Outline Delivery & Servicing Plan sets out that the aim of the plan is to '*Assist in the management of refuse, delivery and*

servicing activities at the development by improving the efficiency of these activities and reducing the impact of the development on the local road network.

- 3.5 It is against these policy / planning guideline requirements and aims that the Outline Delivery & Servicing Plan has been assessed and should be determined in terms of planning consent.

Existing Vehicle Access and Servicing Arrangements

- 3.6 The Outline Delivery & Servicing Plan sets out an assessment of the current servicing arrangements of the site citing that due to layout issues, the largest service vehicle that could enter and exit the site would be a 4.6t Transit type van. Servicing by larger vehicles takes place on-street.

Proposed Servicing Strategy

- 3.7 The Outline Delivery & Servicing Plan sets out that it is proposed to accommodate deliveries on-street within 2 new loading bays on the north side of Pelham Street adjacent to the site. As has previously been reported in the preceding chapter, this will lead to the reduction of the carriageway width to 5.5m.
- 3.8 The current carriageway is around 8.0m in width. Allowing for a 2.0m wide area for parking on the north side, the remaining current carriageway width for through traffic is around 6.0m. Manual for Streets (DfT 2007) at Para 6.5.7 sets out that streets on bus routes should not generally be less than 6.0 m wide. As such the proposed carriageway narrowing to 5.5m is likely to cause problems for bus operations.
- 3.9 Figure 5.1 of the Outline Delivery & Servicing Plan shows swept path analysis for a goods vehicle entering the proposed loading bay and 2 vehicles passing adjacent to the loading bay. It also suggests that there would be insufficient width for 2 buses to pass one another. An extract of this figure is shown in the previous chapter.
- 3.10 This problem was identified in the Stage 1 Road Safety Audit reported in the Transport Assessment which set out that:

The northern footway is being widened to accommodate shared use parking / loading bays. However, the width of the carriageway at this point is being narrowed to 5.5m and there is a two-way local bus service with a frequency of every 12 minutes. Swept paths of buses were provided for assessment, where the margin for error is minimal, which could lead to vehicle incursion into shared use parking / loading bays, the opposing running lane or collisions with pedestrians on the southern footway.

Large vehicle incursion into shared use parking / loading bays could lead to collisions with parked vehicles or vehicle to pedestrian collisions, whilst incursion into the opposing running lane could lead to side swipe collisions.

It is recommended that the northern footway width should be reduced, allowing the carriageway width to be widened thereby increasing the margin of error for passing buses and other large vehicles.

- 3.11 The applicant has not provided a ‘designer’s response’ to the problems raised in the Safety Audit and no amendments to the layout appear to have been made.

Servicing Demand

- 3.12 With regard delivery and servicing trip generations, Table 6.2 of the Outline Delivery & Servicing Plan suggests a servicing trip rate of 0.18 servicing trips per 100sqm of floor area. This is based on 4 TRICS sites which the applicant has assessed. Within the Transport Assessment at Table 8.4 a servicing trip rate of 0.32 servicing trips per 100sqm of floor area is proposed - also based on the same 4 TRICS sites. There is no explanation why a lower trip rate is used in the Outline Delivery & Servicing Plan from that used in the Transport Assessment.
- 3.13 As set out in the previous chapter, there are actually 5 sites within the TRICS database that meet the criteria set by the applicant. Analysis of these 5 applicable TRICS sites for delivery and servicing trip generations shows that the true TRICS trip rate is 1.09 servicing trips per 100sqm of floor area.

Table 1. TRICS Sites Assessment – Servicing & Delivery Trips

TRICS Site	Floor Area (sqm)	No. Surveyed Trips				Resulting Servicing Trip Rate Per 100sqm			
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HM02A01	2036	0	0	0	0	0.000	0.000	0.000	0.000
KN02A01	2255	0	6	23	29	0.000	0.266	1.020	1.286
TH02A01	7049	0	26	14	40	0.000	0.369	0.199	0.567
LB02A01	10200	8	130	83	221	0.078	1.275	0.814	2.167
Total	37979	22	174	216	412	0.058	0.458	0.569	1.085
Split		5%	42%	52%	100%	5%	42%	52%	100%

Source: TRICS Database

- 3.14 On this basis the proposed development could be expected to generate 107 servicing trips per day (made up of 6 OGVs I&2, 45 LGVs and 56 cars). This compares to the applicant’s significantly lower forecasts of 18 servicing trips per day in the Outline Delivery & Servicing Plan (Table 6.2) or 32 servicing trips per day in the Transport Assessment (Table 8.10).
- 3.15 By way of explanation; OGV I&2 (Other Goods Vehicles 1 defined as all rigid goods vehicle over 3.5 tonne gross weight and 2 or 3 axles and includes box vans and similar large vans, while Other Goods Vehicles 2 defined as rigid goods vehicles with four or more axles and all articulated vehicles). LGVs are Light Goods Vans.
- 3.16 The Outline Delivery & Servicing Plan goes on to set out that based on an average dwell time of 12 minutes 36 seconds, the proposed loading bay would be able to accommodate 48 delivery / servicing vehicles over a 6 hour period from 10:00 to 16:00. As set out above, the true level of servicing trip generation could be 107

trips per day, made by 54 delivery / servicing vehicles. This would mean that both proposed loading bays would be in use 100% of the time and there would still be unmet demand. It also assumes that delivery / servicing vehicles would arrive / leave at exact times so that no overlap between delivery / servicing vehicles occurs. In reality it is likely that multiple delivery / servicing vehicles will arrive at the same time leading to the possibility of delivery / servicing vehicles additionally parking on-street (outside the proposed loading bays) and thus causing congestion and delays to bus services.

Servicing Management and Measures

- 3.17 Within the proposed measures, the applicant has committed to a protocol whereby drivers of delivery vehicles loading from on-street will be asked by the office receptionist / manager to load from the proposed loading bays. If they do not comply their delivery will be rejected.
- 3.18 It is questioned how in reality this would work and be applied. It is likely that the first the office receptionist / manager would know about this, is when the delivery driver is standing at the office door with the delivery. It is questioned as to whether the office receptionist / manager would really ask the delivery driver to return to their vehicle with the delivery, and then the delivery driver would move their vehicle in to the loading bay before returning to the office door with the delivery.

Summary

- 3.19 The proposed reduction in the carriageway width to accommodate new loading bays will result in the potential for conflict between buses and other large goods vehicle and other road uses, cyclists and pedestrians. This issue was raised as part of a Stage 1 Safety Audit but no proposed solution is presented.
- 3.20 The applicant has presented two differing assessments of the number of servicing trips the development could generate, both of which are significantly below the actual level of servicing trips generation that could be expected.
- 3.21 As a result, the capacity of the proposed loading bay could fall short of expected demand and lead to delivery / servicing activity on the adjacent carriageway that causes congestion and delay to bus services.

4.0 WASTE MANAGEMENT STRATEGY

- 4.1 The applicant sets out that the Waste Management Strategy for Nos.63-81 Pelham Street considers the potential impacts that may arise from waste generated during the operational phase of the proposed development, with the overall aim of developing a strategy for legislative compliance and good practice in the separation, storage and collection of waste arising
- 4.2 The Waste Management Strategy sets out at Section 3.2 the waste generation assessment carried out as part of the study is based on BS 5906: 2005 Waste Management in Buildings – Code of Practice. This details that office developments should provide 50 litres of waste storage per employee. To ascertain the number of employees the applicant assumes 1 member of staff per 10sqm.
- 4.3 This contradicts the waste generation assessment in the Waste Management Strategy for No.40 Pelham Street which cites RBKC's Planning for Waste Management – Waste Design Guidelines for Architects' (2017) which the applicant sets out requires 2,600 litres of waste storage per 1,000m².
- 4.4 There is therefore a lack of consistency in the approach taken for the 2 applications in terms of waste generation.
- 4.5 With 9,823sqm of office space proposed for the No.63-81 Pelham Street development (as stated in Para 1.3.1 of the submitted Transport Assessment), 982 staff would be accommodated on the basis of 1 member of staff per 10sqm. Hence, under BS 5906: 2005 guidelines, 49,100 litres of waste would be generated per week for the office element. Table 3.3 of the Waste Management Plan states that the office waste generation would be 28,101 litres but this is based on 5,615sqm of office space, rather than 9,823sqm of office space as stated in the submitted Transport Assessment. As such the assessment presented in Table 3.3 of the Waste Management Strategy represents a significant underestimation of office waste generation.
- 4.6 For the gym element, the Westminster guidance the applicant has used sets out D1 land use waste generation as 2,000 litres per 1,000sqm gross floor space. The applicant has used net floor space. If gross floor space is used – as it should be, the resulting gym waste generation forecast is 1,648 litres per week, and not 1,240 litres as set out in Table 3.3.
- 4.7 The assessment goes on to detail that waste will comprise of general waste, dry recyclable waste and food waste, with stores located at basement level. Waste will be collected daily – as such there could be 15 waste collections per working week with bins being wheeled back and forth across the footway, potentially leading to conflict with pedestrian flows.
- 4.8 In summary, the applicant suggests a total waste generation of 29,341 litres per week, whereas the correct figure is 50,748 litres and hence the number of bins that would need to be provided, and as a result the amount of time it will take for bins to be emptied in to waiting refuse vehicles and the number of bin transfer

across the footway will be greater than suggested by the Waste Management Strategy.

5.0 CONSTRUCTION TRAFFIC MANAGEMENT PLAN

- 5.1 The Construction Traffic Management Plan details that consultation has been carried out with local residents' groups and that the main issues raised related to construction traffic and impact on local roads, likelihood of road closures, mitigation for noise and dust, and programme timeframes.
- 5.2 It goes on to set out that during the post consent phase newsletters and meetings with relevant community groups will be actioned to communicate;
- the start date, duration and nature of the project
 - the principal stages of the project
 - all significant operations that have potential to cause disturbance from noise and vibration
 - approximate start and end dates of potentially disruptive works
 - outline details of noise and vibration mitigation steps that are to be used
 - contact names and numbers of appropriate site personnel
- 5.3 A procedure will be put in place to address any issues raised by local community groups. It is set out that works relating to the proposed development at Nos.63-81 Pelham Street are not expected to coincide with works at No.40 Pelham Street or at South Kensington Station. It is suggested that an explicit commitment is made to ensure there is no coincidence with these other two schemes to reduce the impact of construction works on local residential amenity.
- 5.4 Works are proposed to be carried out Monday to Friday from 08:00 to 18:00 but there may be exceptions to this. No deliveries will be accepted before 09:30 or after 15:00. The construction programme is planned to take 22 months from Q1 2023 to Q4 2024.
- 5.5 The Construction Traffic Management Plan includes details of the routeing of demolition, excavation and construction vehicles. This suggests that vehicles will approach the site on Pelham Street from South Kensington Station and leave the site by turning left on to Brompton Road.
- 5.6 Swept path analysis is shown for the in and out bound routeings (unusually on aerial photography rather than an Ordnance Survey mapping base). For the left turn adjacent to the florist stall outside South Kensington Station having entered Pelham Street from Old Brompton Road this shows the construction vehicle significantly over running the centre of the road and the south / west bound traffic lane. The swept path even shows how a construction vehicle would conflict with a bus travelling in the opposite direction as illustrated in the extract below. Given that the south / west bound lane of Pelham Street is congested at all times of the day, this manoeuvre does not seem practical or safe.

Extract of Swept Path Analysis – Entry to Pelham Street



Source: Construction Traffic Management Plan

- 5.7 Demolition, substructure, superstructure and envelope site layouts are shown in response to Q11 of the Construction Traffic Management Plan. For all phases a hoarding line will include the current footway and parking bays along the north side of Pelham Street adjacent to the site frontage. As a result, the northern footway of Pelham Street adjacent to the site will be closed to pedestrian traffic, with diversions to the footway on the south side of Pelham Street.
- 5.8 No analysis of the impact of the closure of the footway on the northern side of Pelham Street has been carried out in terms of Pedestrian Level of Comfort or from a road safety perspective. Additionally, no information is provided on how or where pedestrians will be diverted to the southern footway.
- 5.9 In relation to footway widths, it is relevant to consider the appeal decision made in July 2016 with regards RBKC Application Reference PP/15/04274 in relation to a development proposal at 40 Pelham Street. In dismissing the appeal, the inspector considered that a 2.0m footway width in an area with high pedestrian flows and an active frontage would constitute a road safety concern, with pedestrians having to ask for passage or more likely step out in to the carriageway to pass other footway users. The southern footway opposite Nos.63-81 Pelham Street has a width of around 1.5m and such already 'constitutes a road safety concern'. Additional pedestrian flows diverted from the northern footway will further exacerbate this problem.
- 5.10 In lieu of the applicant's lack of assessment, we have used data from the Transport Assessment that suggests that in the AM peak hour (08:00 to 09:00) 1,195 pedestrians use the east and west bound footways adjacent to the site. During the PM peak hour (17:00 to 18:00) this increases to 1,347. Under the proposals

all of these flows would have to be accommodated on the footway on the south side of Pelham Street which has a width of around 1.5m. At peak times there could be 22 pedestrians per minute on the southern footway. Given its limited width, pedestrians may have to step out in to the carriageway to pass. With a solid hoarding line along the northern edge of the through carriageway, the effective width of the carriageway will be reduced. In conjunction with increase flows on the southern footway, this raises serious concerns over the safety of pedestrians.

- 5.11 In response to Q12 which asks if vehicles will enter / leave the site, the applicant has taken this to mean the current building via existing vehicle access points. For the sake of the Construction Traffic Management Plan the 'site' should include the land within the hoarding line and therefore would include the current footway and parking bays on the north side of Pelham Street. Swept path analysis should have been provided to show how construction vehicles would enter and leave the area within the hoarding line. It is likely that such manoeuvres will be tight and may require accessing / egressing vehicles to cross to the westbound traffic lane. As set out above, Pelham Street is congested for most of the day and as such there would be potential conflict between construction vehicles and stationary / moving westbound traffic.
- 5.12 In response to Q16 which asks if any road closures are required, the applicant has stated that no road closures are required. Q16 requires that pedestrian passage is maintained at all times. The response to Q16 should have included the fact that the northern footway will be closed and that existing parking bays will be suspended, all to be enclosed behind the hoarding line. The effective remaining carriageway width should also have been detailed.
- 5.13 With regards to scheduling, interim data suggests during the peak of the development 31 HGVs and 6 LGV's could visit the site each day.
- 5.14 In response to Q22 which asks '*How will you protect pedestrians from the construction works, particularly vulnerable users*' the applicant has responded;
- The construction site is set well back from the public highway. The existing access will be gated with hoarding panels allowing construction vehicles to reverse into the site with the footway and carriageway left unobstructed.*
- Traffic marshals at the site entrance will ensure that vulnerable road users are protected from vehicle access and egress.*
- 5.15 It is questioned how the footway will be left unobstructed, when the footway will be closed due to the proposed hoarding line as set out in their response to Q25;
- Yes – it is anticipated the northern footpath of Pelham Street will be closed with diversion onto the southern footpath.*
- 5.16 The applicant has committed to deploying traffic marshals to ensure pedestrian and other road user safety.

- 5.17 In summary, swept path analysis of construction vehicles accessing Pelham Street from Old Brompton Road demonstrates that it is likely to lead to conflict with other road users.
- 5.18 The closure of the footway on the northern side of Pelham Street during demolition / construction phases has not been assessed in terms of 'pedestrian level of comfort' on the southern footway or in terms of road safety issues caused by potential pedestrian congestion on the southern footway.
- 5.19 The applicant has not demonstrated that demolition / construction vehicles can manoeuvre in and out of the hoarding line area without conflict with other road users.

6.0 SUMMARY & CONCLUSION

- 6.1 In summary, the Transport Assessment submitted contains a significant number of errors and omissions which erodes confidence in how the document was formulated and the findings / recommendations it presents.
- 6.2 The proposed reduction in the carriageway width to accommodate new loading bays will result in the potential for conflict between buses and other large goods vehicle and other road uses, cyclists and pedestrians. This issue was raised as part of the Stage I Safety Audit but no proposed solution is presented.
- 6.3 The applicant has underestimated the number of 'total person' trips and delivery / servicing trips the proposed development will generate. The capacity of the proposed loading bay falls short of expected demand which could lead to delivery / servicing activity that causes congestion and delay to bus services.
- 6.4 The applicant has presented two differing assessment of the number of servicing trips the development could generate, both of which are significantly below the actual level of servicing trips generation that could be expected. As a result, the capacity of the proposed loading bay could fall short of expected demand and lead to delivery / servicing activity on the adjacent carriageway that causes congestion and delay to bus services
- 6.5 With respect to the Waste Management Plan, the applicant suggests a total waste generation of 29,341 litres per week, whereas the correct figure is 50,748 litres and hence the number of bins that would need to be provided, and as a result the amount of time it will take for bins to be emptied in to waiting refuse vehicles and the number of bin transfer across the footway will be greater than suggested by the Waste Management Strategy.
- 6.6 Finally in relation to the Construction Traffic Management Plan, swept path analysis of construction vehicles accessing Pelham Street from Old Brompton Road demonstrates that it is likely to lead to conflict with other road users.
- 6.7 The closure of the footway on the northern side of Pelham Street during demolition / construction phases has not been assessed in terms of 'pedestrian level of comfort' on the southern footway or in terms of road safety issues caused by potential pedestrian congestion on the southern footway.
- 6.8 The applicant has not demonstrated that demolition / construction can manoeuvre in and out of the hoarding line area without conflict with other road users.
- 6.9 In conclusion the applicant has not presented a fully detailed and accurate assessment of the traffic implications of the development to allow planning consent to be granted.