### LATIMER ROAD TO WOOD LANE PEDESTRIAN/CYCLE UNDERPASS PLANNING APPLICATION PP/24/0834 REPRESENTATION FROM THE ST QUINTIN AND WOODLANDS NEIGHBOURHOOD FORUM AND ST HELENS RESIDENTS ASSOCIATION

The StQW Neighbourhood Forum was designated by RBKC in 2013, and redesignated following public consultation exercises in 2018 and 2023. The Forum shares its membership of 370 residents and businesses with the St Helens Residents Association, which acted as the 'qualifying body' in establishing the forum. This representation expresses the views of both bodies.

We have been involved in the Imperial underpass project since the original S106 commitment to provide this community benefit was entered into between the College and LB Hammersmith & Fulham in 2012.

A report was included on the agenda of the RBKC Planning Applications Committee on 11th November 2014, seeking planning consent to the entrance/exit to the underpass on the Latimer Road side of the borough boundary. We attended and spoke at this meeting, along with former councillor Judith Blakeman. A decision on the application was deferred in order that more information could be obtained about security and maintenance of the underpass, including at its entrance/exit on Latimer Road.

Subsequently the Forum took part in project meetings with Imperial College and the Westway Trust, during the many years when negotiations were taking place between Imperial College, LBHF and Network Rail on which body would take on responsibility for an 'asset protection agreement' for the underpass. This matter was finally resolved in 2022 when Network Rail confirmed their intention is that they will own and maintain the whole of the structure.

The 2018 StQW Neighbourhood Plan supports proposal for the underpass, subject to the details of the design and 24/7 monitoring of CCTV cameras (page 43 of the Plan). The current updated proposals were discussed at an open meeting of the forum/residents association on December 9th 2024, attended by 45 members.

On a hand vote, a motion on whether to support or oppose the underpass proposals was near unanimous in expressing support. A second motion, as below, was also strongly supported

# Do we want commuter/delivery cyclists prevented from speeding and encouraged to use cycle route through Westway sports centre rather than Oxford Gardens.

This remains the position taken by the forum/association in this representation. We have been tracking responses to the application on the RBKC website and have noted the levels of support and opposition, and points raised by respondents.

We particularly support the comments of the Notting Dale Campus, saying We would like to see clear signage and wider improvements to the signposting to the Latimer Road Tube Station and the Notting Dale Campus on exiting the tunnel, and encouragement of the Westway Trust to improvement the neglected streetscape and lighting of the adjoining Westway Leisure Centre.

Following publication of the planning application and supporting documents in January 2025, we have maintained contact with the Associate Provost at Imperial College and with the Westway Trust. It has been disappointing that the applicants have not convened a session with the Forum and the Trust at which questions about potential pedestrian/cycle conflicts at the eastern end of the underpass Latimer Road underpass could be discussed. Our comments below, and our request for planning conditions, are based on the content of the supporting documents to the application. We hope that some of these questions can be answered at the Planning Committee/Planning Applications Committee at which the application is determined.

### What is the forecast use of the underpass by pedestrians and cyclists?

The Transport Statement prepared for Imperial by Stantec includes a Network Impact Assessment. This states Although the initial volume estimates for the level of use by pedestrians and cyclists are generally in the low category, the expectation is the availability of the through route from Wood Lane to Latimer Road, albeit via private roads and paths and shared use of public realm areas, will result in the volumes of both pedestrians and cyclists increasing over time. Notwithstanding, it is not expected that future volumes will exceed the capacity of the proposed path dimensions.

This conclusion appears to be based on analysis of a very limited geographic 'network' confined largely to Imperial's campus rather than the wider area within the two Boroughs. The methodology used for the 'estimated path demand' is based on *three areas of likely demand; cycle trips from the East-West link to the Cycle Hub within Campus South, from the East-West Link to all areas within Campus South and Campus North, and pedestrian trips from the East-West Link to both campuses. This seems a very limited range of likely trips as compared with the totality of demand to cross the Borough boundary between North Kensington and North Hammersmith.* 

As local residents we foresee potential very high pedestrian usage of the underpass, given the longstanding lack of connectivity across the West London Line and the significant detours currently needed (both to the north and south of the underpass location).

As the Transport Statement notes *The Latimer Road area is currently poorly served by* access to public transport, and rail in particular, with PTAL scores of between 2 and 3, indicating poor to moderate accessibility. This comment applies to much of the wider StQW neighbourhood area. Lack of access to the Central Line and buses along Wood Line has been a continuing frustration for RBKC residents in the 13 years it has taken for this project to reach the stage of a potential planning consent.

In terms of cyclists, we foresee the same significant increase in volume of traffic. A particular concern is that once this new through route appears on Waze and Google maps, delivery bikes, scooters, and cargo-bikes will vey swiftly recognise the savings in time and distance. This leads on to our second question:

# What types of 'cycle' will be permitted to use the underpass and how will this be controlled at the Latimer Road end?

We are not finding a clear answer in the application documents. The **Transport Strategy** states at 3.1.3 *No vehicular access is to be permitted through the underpass*. How is this to be enforced?

The Transport Strategy concludes Notwithstanding, the future demand is not expected to exceed the capacity and level of service that the proposed path widths and segregation will provide. The existing path and public realm areas within Campus North are generally wider than the proposed new path and **include existing bollards that will assist in managing cyclist speeds as the enter the campus, where considerate cycling is permitted (**our emphasis).

We accept that the College may prove able to '*manage cyclist speeds*' and ensure '*considerate cycling*' on Campus North itself. We believe that the College will find that its areas of 'public realm' and 'permissive public space' are much harder to manage once a new through route is opened up — with residents in the wider area making increasing use of doorstep deliveries in addition to growing east-west cycle commuter traffic.

As shown in the January 2025 Panorama programme (the <u>Battle for our Streets</u>) regulatory responses to control the anti-social and unsafe use of e-bikes and scooters are only beginning to emerge. While the Mayor and the Boroughs are due to gain new powers on dumping of e-bikes, problems of misuse of illegal e-bikes and of cyclist behaviour more generally (ignoring traffic lights, road signage, riding on pavements) has been a major change to the lives of Londoners in recent years.

Our understanding of the current (very confused) position on what is a 'vehicle' and what is a 'cycle' is that e-bikes which are throttle controlled and do not require use of pedals to move off, are classed as a moped and hence as a 'vehicle'. While privately owned e-bikes and ride on scooters are in theory not allowed on the highway (whereas rented e-bikes are) their use on London's streets now seems widespread.

Similar questions apply to ride-on 'e-scooters'. Use of cargo bikes for last mile delivery is positively encouraged as part of the Mayoral transport strategy in *TfL's Cargo Bike Action Plan*. A few years back, delivery company Getir operated 24 hours a day from one

of the light industrial units in Latimer Road, with a fleet of e-scooters. Attempts to deliver orders from North Hammersmith residents would no doubt have been made, night and day, via the underpass.

The Transport Strategy states It is therefore appropriate to consider some form of physical access control to prevent unwanted vehicle access. On the College campus side, these measures will include bollards and planters, along with supervision by CCTV and College on-site staff.

On the Latimer Road side, the proposals are as follows: *Therefore, a row of bollards is proposed across the entrance to the path adjacent to back (sic) of the Latimer Road footpath with a spacing of 1.5 metres. This will need careful design and very clear lighting to ensure cyclists have adequate awareness when approaching the path, particularly when turning onto the path from Latimer Road where forward visibility will be limited.* We do consider that a row of bollards with this spacing will deter use by mopeds and e-scooters, or even motor bikes. Such bollards will barely slow down such users.

The **Security Statement** submitted with the application gives more detail on Imperial's security arrangements. This document provides some reassurance on levels of lighting and CCTV coverage in at both ends of the underpass.

In terms of the Latimer Road end, we do not see how Imperial College will prove able to exercise and significant 'management' or 'control'. While CCTV images may be available, what sanctions, penalties or other forms of action will the College be able to undertake? Is the College going to deploy its security staff, night and day, at this end of the underpass?

The section of the Security Statement on 'Anti Vehicle Measures' states *Physical* barriers will be installed at each end to prevent the access of motorcycles and mopeds, while still allowing free access for pedestrians and cyclists, in alignment with the Transport for London 'Cycling for all strategy' dated 2023. Planters are proposed on the east and west approaches.

We do not see bollards spaced at 1.5m as a 'physical barrier'. For this reason we are asking that a planning consent be conditioned to include installation of staggered steel barriers at the Latimer Road entrance/exit to the underpass, as an alternative to bollards. We appreciate that barriers are less visually appealing, but they at least require riders to slow right down and to dismount if using heavier and more powerful e-bikes or scooters.

Such barriers are used at e.g. the alleyway at Verity Close, off Lancaster Road (see below).





A third and separate explanation of proposed measures was provided to us in an email from the College's Associate Provost in an email in January, responding to our concerns. This read:

In accordance with the Highway Code, only pedal cycles and rental electric scooters will be permitted to use the cycle path. We will align with TfL and use CCTV camera in key, and visi-ble, locations to deter drivers of vehicles from breaking the rules. The Imperial CCTV system already interfaces with the LBHF CCTV control room, therefore LBHF will also be able to monitor.

The White City Campus is private land, with clear signage. Vehicle access to the campus is controlled at its boundaries; north and south entrances. Mopeds are not permitted to access the campus but physically can due to the cycle path, which will also be the case at the East-West Link entrance. In addition to the continuous CCTV monitoring, there is on site presence 24/7.

If a moped, or other unauthorised vehicle (e.g. electric scooter) enters the campus the user will be stopped and educated and politely informed that it is trespassing and asked to leave the campus; if the problem persists it would be treated as anti-social behaviour. However, Imperial is pleased to say that it has minimal issues at White City with unauthorised users (e.g. Mopeds), and the planned mitigations outlined for the East-West link are intended to continue the management and monitoring of such unauthorised activities.

We are doubtful that the College will prove able (via use of signage alone) to 'allow only rented e-bikes and scooters' (i.g. Lime, Forest etc) to enter the underpass from the Latimer Road end. On emerging into the College's 'permissive public realm' will non-

rental users be asked to go back to Latimer Road? Privately owned e-scooters (the stand-on variety) appear frequently on the streets of North Kensington and distinguishing these on sight from rented versions is not always easy.

We accept that the College may have 'minimal issues' at the present time at its 'northern campus'. But the objective of this new 'east-west link' relates to wider longterm plans for a major north/south pedestrian/cycle route through College's northern and southern sites, the residential towers at White City Living, and the Westfield Centre and Shepherds Bush Green.

While this north/south route is only beginning to be used (alongside Imperial's Scale Space buildings) it will ultimately become a major pedestrian/cycle thoroughfare for Kensington and Hammersmith residents. This long-term 'vision' dates back to the 2004 masterplan from the Office of Metropolitan Architecture and LBHF's OAPF for White City East. We do not understand why Imperial seems to be underplaying the likely levels of use of an underpass that forms a critical part of this wider spatial planning framework.

# What needs to happen in the area between the Latimer Road entrance/and the Westway Sports Centre?

This location has long been viewed by those living nearby as unsafe after darkness falls, and as a hotspot for crime and anti-social behaviour. Because there is currently low footfall and few 'eyes on the street' outside the working day, the pedestrian cycle routes through the sports centre to Latimer Road Underground and southwards to Notting Dale are not as much used as they could be. One of the positive benefits of the proposed underpass is that this context will change, with much increased footfall.

The Security Statement from Imperial gives information on video surveillance, as below:

The VSS cameras will be linked directly back to the Imperial security centre. There will be an interface for the Metropolitan Police via the LBHF network. The cameras will be fixed IP based cameras capable of providing positive identification of persons using the underpass.

The cameras will comply with the minimum technical requirements as defined by the Metropolitan Police Designing Out Crime Officer (DOCO) and the LBHF security masterplan. The cameras installed in and around the underpass will make use of video analytics where a feed will be directly transmitted to the Imperial security control room if a person or persons are gathered for a pre-determined length of time. **At least one camera will be turned towards the Latimer Road approach, thus ensuring surveillance across the whole area** (our emphasis added).

The Forum considers it essential that there is full CCTV coverage in the wider area at the Latimer Road entrance/exit, extending into the boundary of the land held by Westway

Trust. We suggest that RBKC should implement streetscape improvements at this location. Our recollection is that the Council drew up proposals a decade ago as a bid for Mayoral funding, which were not pursued. Westway Trust has its own plans for improvements to pedestrian/cycle routes throughout the 23 acres which it manages.

Imperial as applicants point out that signage beyond the Latimer Road entrance/exit is outside its control and the scope of this project. We suggest that RBKC Highways bring forward a scheme for road markings and signage that will encourage cyclists emerging onto Latimer Road to head southwards through the Westway Trust land (if this is their intended direction of travel) rather than using Oxford Gardens as their route. Excessive cycle traffic on this section of Oxford Gardens will cause harm to residents, and will increase road safety risks in a street that already carries fairly heavy traffic and includes Oxford Gardens Primary School.

### Timetable for construction of the underpass

We ask that the Planning Committee/PAC seeks firm assurances from Imperial College on the timescales of start and completion of this project. Many of the representations expressing support for the application have pointed out the decade-long wait for the scheme to start on site.

### Conclusions

The St Quintin and Woodlands Neighbourhood Forum supports application PP/24/08435. We ask for the following conditions to be attached to any planning consent:

A) that staggered steel barriers are positioned at the Latimer Road entrance/exit to the underpass in place of the proposed 1.5m spaced bollards.

B) that RBKC transport staff undertake a road safety audit of the Latimer Road entrance/exit three months after the opening of the underpass, to assess levels of use and risks of pedestrian cycle conflicts.

St Quintin and Woodland Neighbourhood Forum St Helens Residents Association March 2025 www.stqw.org