LONDON FILM SCHOOL, 39 - 41 PARKER STREET

TRANSPORT STATEMENT

PROJECT NO. 23/112 DOC NO. D001

DATE: JULY 2023

VERSION: 1.0

CLIENT: LONDON FILM SCHOOL

Velocity Transport Planning Ltd

www.velocity-tp.com

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Transport Planning

DOCUMENT CONTROL SHEET

Document Reference

Project Title	London Film School, 39 - 41 Parker Street
Document Title	Transport Statement
Project Number	23/112
Document Number	D001
Revision No.	2
Document Date	JULY 2023

Document Review

	Name	Date completed
Prepared By	AM	July 2023
Reviewed By	DF	
Authorised By	DF	

Notes

The document reference number, revision number and date are given on the footer of each page

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1 INTRODUCTION

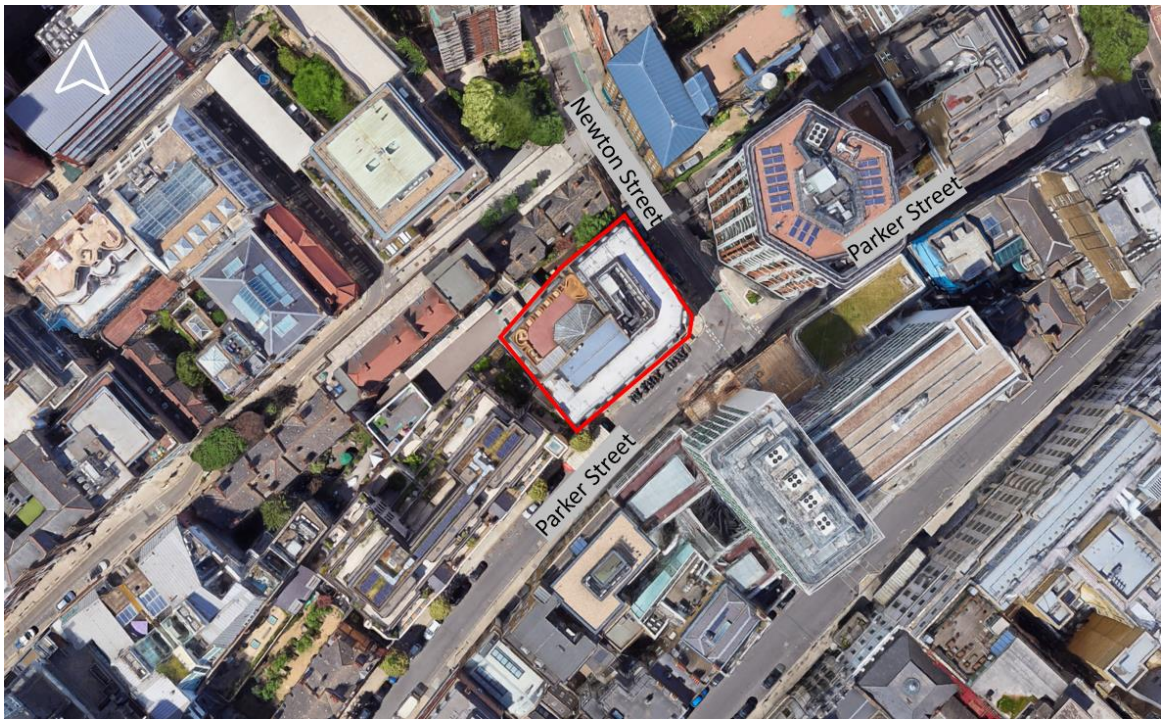
1.1 APPOINTMENT

1.1.1 Velocity Transport Planning has been appointed by the London Film School (LFS) to prepare this Transport Statement (TS) in support of the change of use proposals associated with 39 – 41 Parker Street (the site), situated within the London Borough of Camden.

1.2 SITE LOCATION

1.2.1 **Figure 1-1** indicates the location of the site, with the existing building bound by commercial buildings to the north and west, Newton Street to the east and Parker Street to the south.

Figure 1-1: Site Location and Local Context



1.3 EXISTING SITE

1.3.1 The building itself comprises ground and three upper storeys with a mansard extension and basement. The three upper storeys are currently in use as office, whilst the basement and part of the ground floor is mixed use (primarily office with cinema), consented under ref: 2013/3792/P. The cinema currently operates as The Garden Cinema, a two screen, digitally equipped, independent cinema with an ancillary café/bar. The upper three storeys of the building are currently vacant. The mansard extension is out of the scope of this application, but the floor is currently in use as office space and will continue to be used as such.

1.4 PROPOSED DEVELOPMENT

1.4.1 The proposal seeks a change of use at 39-41 Parker Street from office to educational use for the London Film School (LFS). This includes refurbishment of the existing building to provide studio and teaching space on the first, second and third floors of the building.

1.4.2 The Garden Cinema currently occupies part of the building at ground and basement levels and operates two cinema screens on site. As part of the proposals, a third screen would be installed at ground floor level primarily for the use of the LFS, however it is also expected to be used by the Garden Cinema on an ad hoc basis.

1.4.3 No structural changes are proposed to the building, and no alterations would be made to the quantum of floorspace provided. Changes to the building would be internal cosmetic/ layout changes only.

1.4.4 London Film School (LFS) is the oldest film school in the UK and currently operates facilities on Shelton Street in Westminster, with in the order of 250 students and 85 staff associated with the school. LFS has been the place for emerging creative talent to hone their craft, find their voice and engage directly with the vibrant UK screen industries. The school offers three full-time MA programmes, a Ph.D. Film by Practice, and a full calendar of short courses.

1.5 REPORT STRUCTURE

1.5.1 This Transport Statement (TS) assesses the transport impacts of the proposed development and details the access, parking and servicing facilities. The TS has been prepared in line with London Plan and LB Camden Guidance. The remainder of this report is set out as follows:

- Section 2: sets out the national, regional and local policy context;
- Section 3: reviews the site's accessibility;
- Section 4: includes details of the baseline highway network;
- Section 5: undertakes and Active Travel Zone assessment;
- Section 6: sets out the existing site arrangements;
- Section 7: describes the proposed transport strategy;
- Section 8: provides an assessment of anticipated travel demand; and
- Section 9: sets out the summary and conclusions of the report.

2 POLICY CONTEXT

2.1 INTRODUCTION

2.1.1 This section sets out details of relevant transport-related policies. National, regional and local planning policies place a focus on encouraging development that maximises the use of sustainable travel modes in areas with good public transport connectivity and which reduces the need to travel by car.

2.2 NATIONAL PLANNING POLICY FRAMEWORK (2021)

2.2.1 The National Planning Policy Framework (NPPF) was revised in July 2021 and sets out the Government's planning policies for England and provides a framework within which locally prepared plans for housing and other development can be produced. At its heart the NPPF sets out a presumption in favour of sustainable development (Paragraph 11).

2.2.2 The NPPF promotes sustainable transport. It notes that transport issues should be considered at the earliest stages of development proposals.

2.2.3 Chapter 9 of the NPPF sets out the requirements for promoting sustainable transport advising that 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. The NPPF advises that 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.

2.2.4 In Paragraph 108 the NPPF sets out that maximum parking standards should only be set when there is clear justification that they are necessary to manage the local road network or optimise the density of development in urban areas that are well served by public transport services. The London Plan sets out maximum parking standards for London, which will be discussed below.

2.2.5 Paragraph 110 states that when considering development proposals, it should be ensured that:

a) *appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*

b) *safe and suitable access to the site can be achieved for all users;*

c) *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*

d) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree*.

2.2.6 Paragraph 111 states that "*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*."

2.2.7 Paragraph 112 states that applications for developments should:

a) *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;*

b) *address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*

c) *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;*

d) *allow for the efficient delivery of goods, and access by service and emergency vehicles; and*

e) *be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*

2.3 LONDON PLAN (2021)

2.3.1 The London Plan was published in March 2021. 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.

2.3.2 Policy T1 notes that development proposals should target 80% of all trips in London are 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."*

2.3.3 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.

2.3.4 Policy T2 also sets out how development proposals should demonstrate how they will:

- *Deliver improvements that support the ten Healthy Streets indicators, in line with TfL Guidance;*
- *Reduce the dominance of vehicles on London's streets; and*
- *Be permeable by foot and cycle and connect to local walking and cycling networks, as well as public transport.*

2.3.5 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 in the vicinity of the new development.

2.3.6 Policy T5 sets out that development should encourage cycling and provide minimum cycle parking standards. Cycle parking and cycle parking areas should allow easy access and provide facilities for larger and adapted bikes and all cyclists. In places of employment, supporting facilities are recommended, including changing rooms, maintenance facilities, lockers and shower facilities. The policy also states that all cycle parking should be designed in accordance with the guidance contained within the London Cycle Design Standards (LCDS).

2.3.7 Table 10.2 of the London Plan provides the minimum cycle parking standards for land use classes prior to changes to use classes arising from the Town and Country Planning (Use Classes) (Amendment) (England) regulations 2020. Relevant cycle parking standards are shown in **Table 2-1:**

Table 2-1: London Plan – Minimum Cycle Parking Standards

LAND USE CLASS		LONDON PLAN MINIMUM CYCLE PARKING STANDARDS	
		Long-Stay	Short-Stay
D1	Universities and colleges	1 space per 4 FTE staff and 1 space per 20 FTE students	1 space per 7 FTE students

2.3.8 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. Policy T6.5 states that all non-residential elements of a development should provide at least one on or off-street disabled persons parking bay.

2.3.9 Policy T7' Deliveries, Servicing and Construction', sets out inter alia:

> *"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."*
>
> *"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."*

2.4 MAYOR'S TRANSPORT STRATEGY (2018)

2.4.1 The Mayor's Transport Strategy (MTS) was published in March 2018 and sets out the mayor's policies and proposals to reshape transport in London over the next 25 years.

2.4.2 The central aim of the MTS is for 80% of all trips in London to be made on foot, by cycle or using public transport y 2041.

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

1. Healthy Streets and healthy people

The MTS promotes a new Healthy Streets approach to reduce car dependency and increase active, efficient and sustainable travel. Street environments should be designed to encourage walking and cycling to assist Londoners with staying healthy.

2. A good public transport experience

For longer trips, public transport is the most efficient way for people to travel and should be attractive to facilitate a mode shift away from car use. Improvements to the public transport network are outlined including new infrastructure.

3. New homes and jobs

This section of the MTS highlights the projected growth of London's population, over the coming decades and sets out the need for the city's growth to be shaped by the Good Growth principles. Promoting high density, mixed use and well-connected developments that enable the city to grow sustainably and positively.

2.4.4 The MTS outlines transport principles of Good Growth as being:

- Good access to public transport;
- High-density, mixed-use developments;
- People choose to walk and cycle;
- Car-free and car-lite places;
- Inclusive, accessible design;
- Carbon-free travel; and
- Efficient freight.

2.5 LB CAMDEN LOCAL POLICY

CAMDEN LOCAL PLAN (2017)

2.5.1 The Camden Local Plan sets out the Council's vision for the borough for the period from 2016-2031.

2.5.2 The transport chapter of the Plan states that encouraging and facilitating mode shift away from motor vehicles toward walking and cycling is a key aim. This mode shift also enables two of the Council's other goals; improving air quality and improving health and wellbeing through promoting physical activity.

2.5.3 Policy T1 'Prioritising walking, cycling and public transport' promotes sustainable travel within the borough. The policy sets out requirements for developments to provide high-quality public realm and to improve the pedestrian environment. The Council seeks to promote and facilitate cycling within developments through the provision of cycle storage and infrastructure. Finally, Policy T1 states that development should promote the provision of public transport and contribute towards improvements where future travel demands exceed capacity.

2.5.4 Policy T2 'Parking and car-free development' limits car parking availability for new development. New development within the borough is required to be car-free, other than spaces designated for disabled people where necessary and/or essential operational or servicing needs.

2.5.5 Policy T4 'Sustainable movement of goods and materials' states that the Council will promote sustainable means of freight transport and seek to minimise the movement of goods and materials by road. Developments of over 2,500sqm likely to generate significant movement of goods or materials by road (both during construction and operation) will be expected to:

- *"minimise the impact of freight movement via road by prioritising use of the Transport for London Road Network or other major roads;*
- *accommodate goods vehicles on site; and*
- *provide Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments where appropriate."*

2.5.6 The Council's preference is for servicing bays to be accommodated within a development.

CAMDEN SUPPLEMENTARY PLANNING GUIDANCE – TRANSPORT (2021)

2.5.7 The Camden Planning Guidance (CPG) on Transport was adopted in 2021 and provides detailed guidance on transport matters, in line with the Camden Local Plan policies.

2.5.8 The Guidance cover a range of transport issues including assessing transport impact, Travel Plans, Delivery and Servicing Plans, car parking, vehicle access, cycling facilities and pedestrian/cycle movement. The Guidance sets out expectations for Transport Statements/Assessments Travel Plans, Delivery and Servicing Plans and Car Parking Management Plans.

2.5.9 Car-free development is expected through the Borough with onsite parking limited to spaces designated for disabled people where these are needed. Paragraph 5.20 notes that for minor development the Council will seek to accommodate Blue Badge parking on-street. As Blue Badge / Green Badge holders are able to use parking spaces in Controlled Parking Zones without a parking permit, providing disabled parking provision on-street may be considered acceptable if the on-street provision is adequate.

2.5.10 The Guidance refers to the London Plan minimum cycle parking standards and Paragraph 8.6 of the SPG notes that the Council will seek an additional 20 per cent of spaces above the London Plan minimum quantum to support the expected growth in the borough.

2.5.11 Section 4 of the CPG covers servicing and states that developments with no access to on site loading facilities should clearly state via a Delivery and Servicing Plan where deliveries would occur, as well as details of existing kerbside restrictions within the immediate vicinity.

2.5.12 Paragraph 4.17 states that *"When considering the location of the on-street loading, applicants should try to avoid, where possible, high streets or busy main roads where loading could be carried out from the rear or a side road as an alternative, or within close proximity to bus stops and junctions. Loading must also not prevent the safe operation of highways infrastructure such as cycle lanes and crossing facilities."*

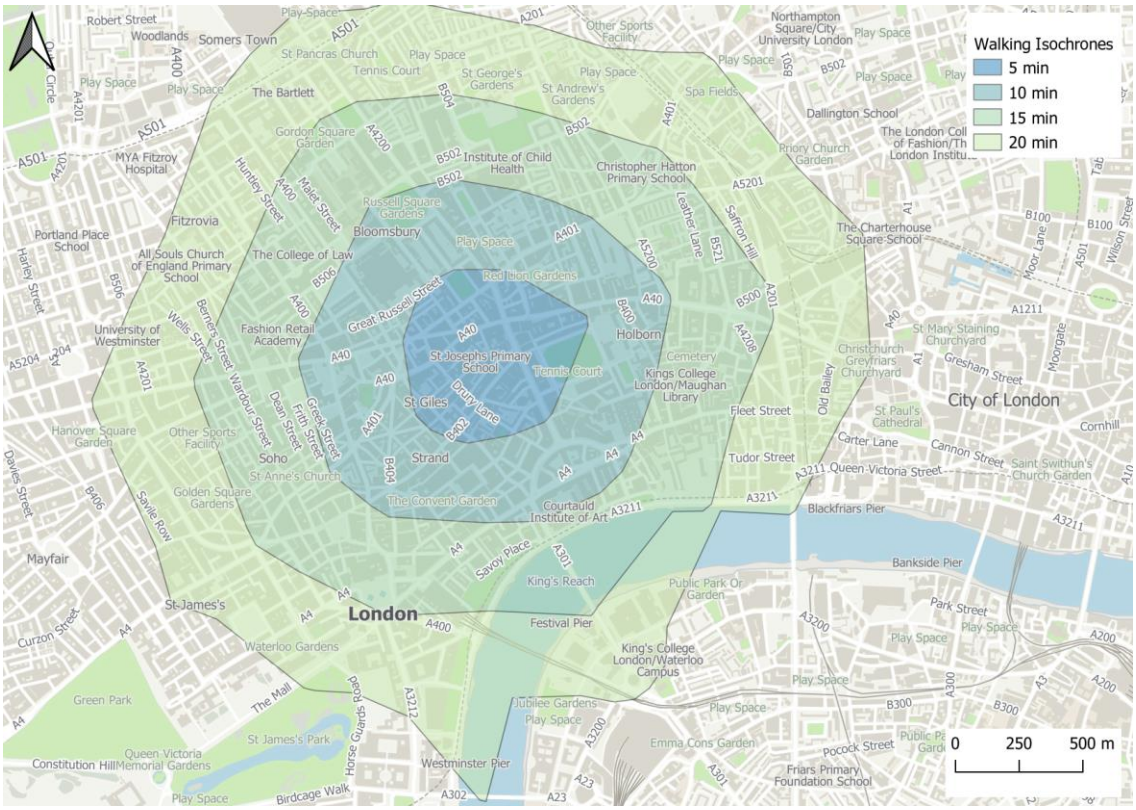
3 SITE ACCESSIBILITY

3.1 PEDESTRIAN NETWORK

3.1.1 The National Travel Survey notes that walking is the most frequent travel mode used for short-distance trips (within 1 mile / 1.6km). Infrastructure that supports efficient travel on foot is therefore of great importance to promoting sustainable and active travel and walking as a viable alternative to trips by car.

3.1.2 **Figure 3-1** shows the 5, 10, 15 & 20 minute walk catchments of the site demonstrating that large parts of Camden and Westminster can be easily accessed on foot. There is also a network of footways and crossings catering for pedestrian movement throughout the local area.

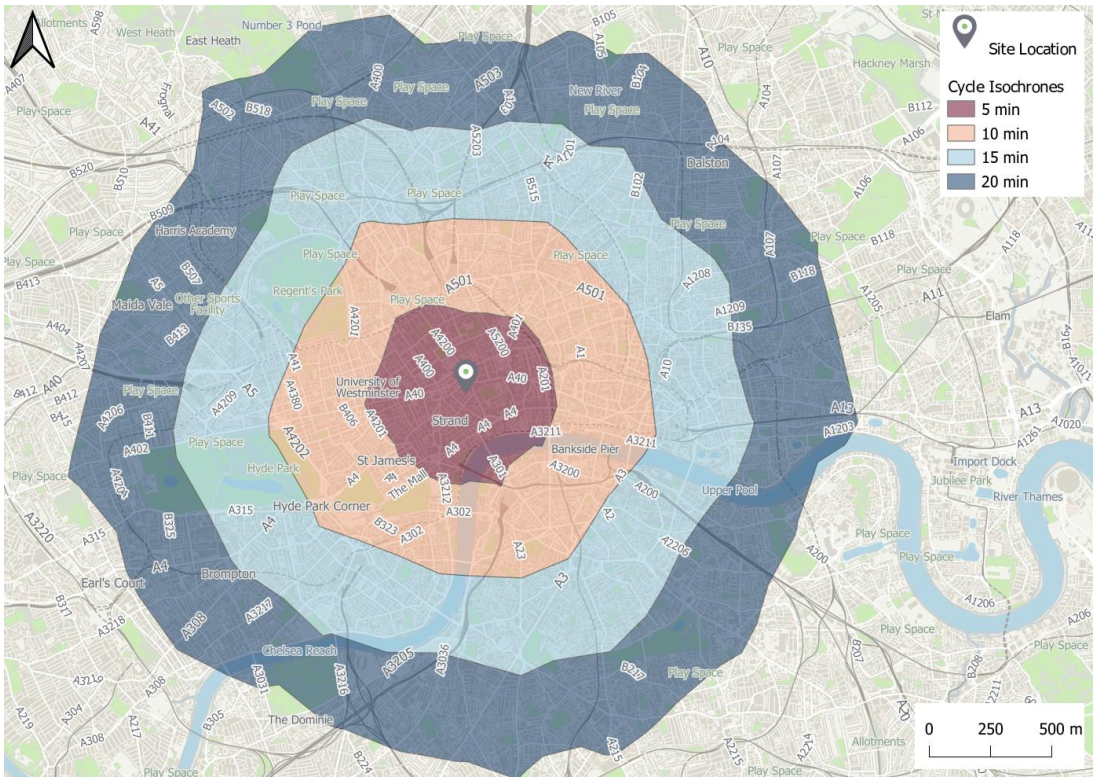
Figure 3-1: Walk Catchment Travel Times



3.2 CYCLING NETWORK

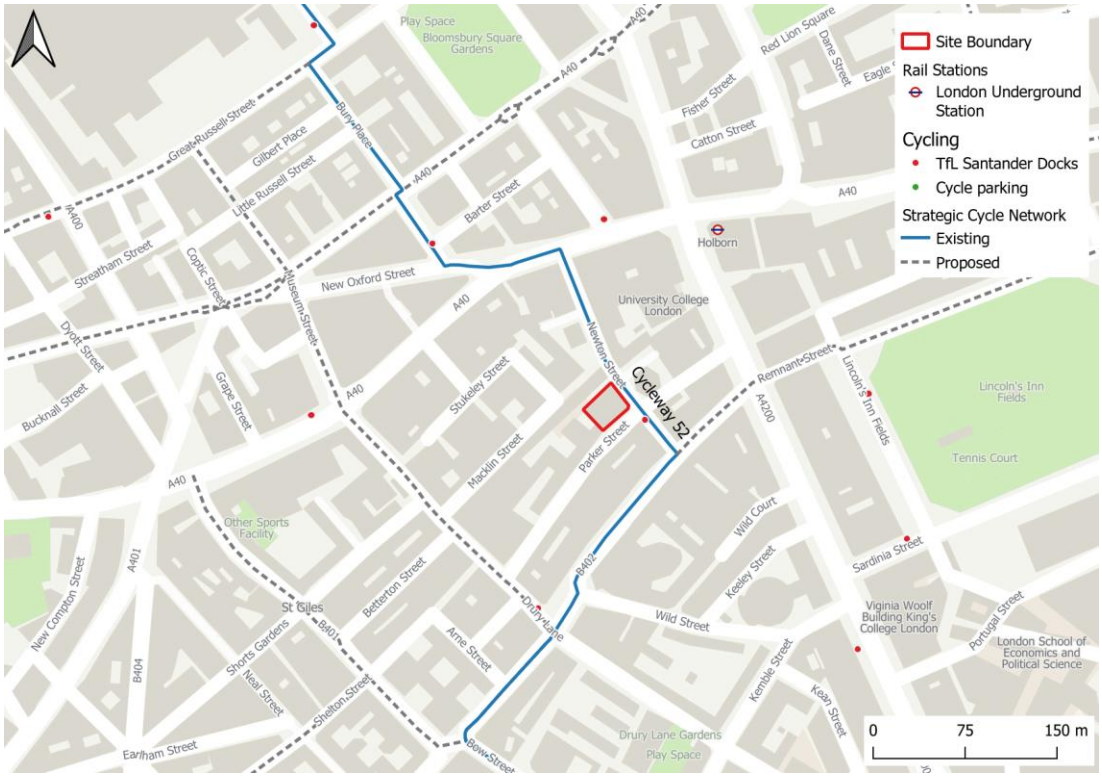
3.2.1 Cycling is a healthy means of travel and has the potential to substitute for short car and public transport trips, particularly those less than five kilometres in length albeit many cyclists will travel further when commuting. **Figure 3-2** shows 5, 10, 15 and 20 minute cycle catchments from the site, which shows that large areas of central London are accessible within a 10 minute cycle of the site, and areas such as Kennington, Earls Court, Islington and Bow are accessible within a 20 minute cycle of the site.

Figure 3-2: Cycle Catchment Travel Times



3.2.2 The site is well-connected for cyclists, with several cycle routes in close proximity of the site. **Figure 3-3** shows the local cycle routes.

Figure 3-3: Local Cycling Routes and Docking Stations



3.2.3 Cycleway 52 runs to the east of the site and provides a link between Euston to the west and Covent Garden to the east. The cycle way also interfaces with Cycleway 10 providing further cycling access across London.

3.2.4 There is a Santander Cycles Station on Newton Street which provides 24 cycle hire docking stations and is located within a 25m walk of the site.

3.3 PUBLIC TRANSPORT NETWORK

PUBLIC TRANSPORT ACCESS LEVEL

3.3.1 PTAL is used to assess the connectivity of a site to the public transport network in consideration of the access time and frequency of services. It considers rail stations within a 12-minute walk (960m) of the site and bus stops within an eight-minute walk (640m) and is undertaken using the AM peak hour operating patterns of public transport services. An Access Index (AI) score is calculated that is used to define a PTAL score.

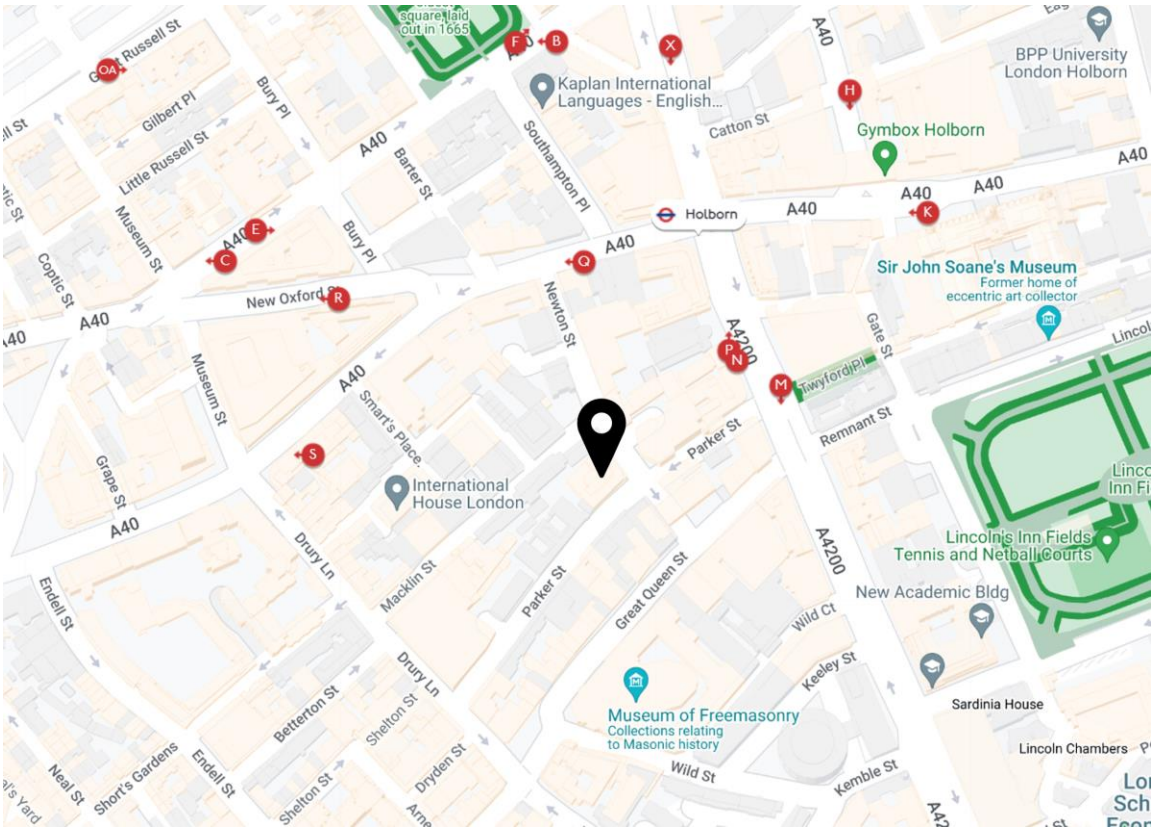
3.3.2 TfL's online WebCAT tool shows that the site achieves a PTAL level of 6b (excellent). The WebCAT PTAL map is shown in **Figure 3-4**, which shows that the site and the surrounding area have excellent access to public transport facilities. The site's location, near to Holborn, Covent Garden, Tottenham Court Road and Temple London Underground Stations is also shown.

Figure 3-4: Site PTAL Map

BUS NETWORK

3.3.3 The closest bus stops to the site are located on Kingsway and New Oxford Street, which are located east and north respectively. Kingsway bus stops offer a total of 6 bus routes and New Oxford Street offers a further 5 bus routes. There are further bus stops within a suitable walking distance of the site, as set out in **Figure 3-5.**

Figure 3-5: Surrounding Bus Stops



3.3.4 The local bus routes are summarised in **Table 3-1.**

Table 3-1: Local Bus services

STATION	NO	ROUTE	FREQUENCY (MINUTES/ SERVICE)	
			Monday - Friday	Saturday
Bus Stop 'N' Kingsway	59	Telford Avenue – King's Cross Station/York Way	4-8	6-10
	68	St Julian's Farm Road – Euston Bus Station	6-9	8-12
	91	Tottenham Lane Y M C A – Whitehall/Trafalgar Square	6-10	8-12
	168	Royal Free Hospital – Dunton Road	5-8	7-11
	N91	North Greenwich Station – Russell Square	6-10	7-10
	X68	Cockfosters Station – Whitehall/Trafalgar Square	Night bus service from 00:58 – 5:28, 2 services / hr	
Bus Stop 'R' New Oxford Street	98	Pound Lane/Willesden bus Garage – Red Lion Square	6-10	6-8
	N8	The Lowe – Holles Street	Night bus service from 0:22 to 6:00, 3 services/ hr	
	N25	Holles Street – Hainault Street	Night Service from 01:17 to 5:00, every 7 – 13 minutes	
	N98	Stanmore Station – Red Lion Square	Night Service from 00:32 to 06:00, 4 per hour	
	N207	Uxbridge Station – Bloomsbury Square	Night Service from 00:00 to 05:15, 4 per hour	

LONDON UNDERGROUND

3.3.5 Due to the central location of the site, there are many London Underground Stations within walking distance which are listed below with walking distance and time.

- Holborn Underground Station - 350m (5 minute walk);
- Tottenham Court Road Underground Station - 650m (9 minute walk);
- Covent Garden Underground Station - 450m (5 minute walk);
- Leicester Square Underground Station - 700m (8 minute walk);
- Piccadilly Circus Underground Station - 1.2km (14 minute walk); and
- Charing Cross Underground Station - 1.1km (14 minute walk).

3.3.6 Piccadilly Line services are available from both Holborn and Covent Garden stations providing access towards locations between Heathrow and Cockfosters. Services operate every 2-3 minutes.

3.3.7 Additionally, Central Line services are also available from Holborn Station and Tottenham Court Road providing access towards stations between West Ruislip and Epping. Services operate every 2-3 minutes. Northern and Bakerloo line services can also be caught from Tottenham Court Road and Piccadilly Circus Underground Stations respectfully.

RAIL NETWORK

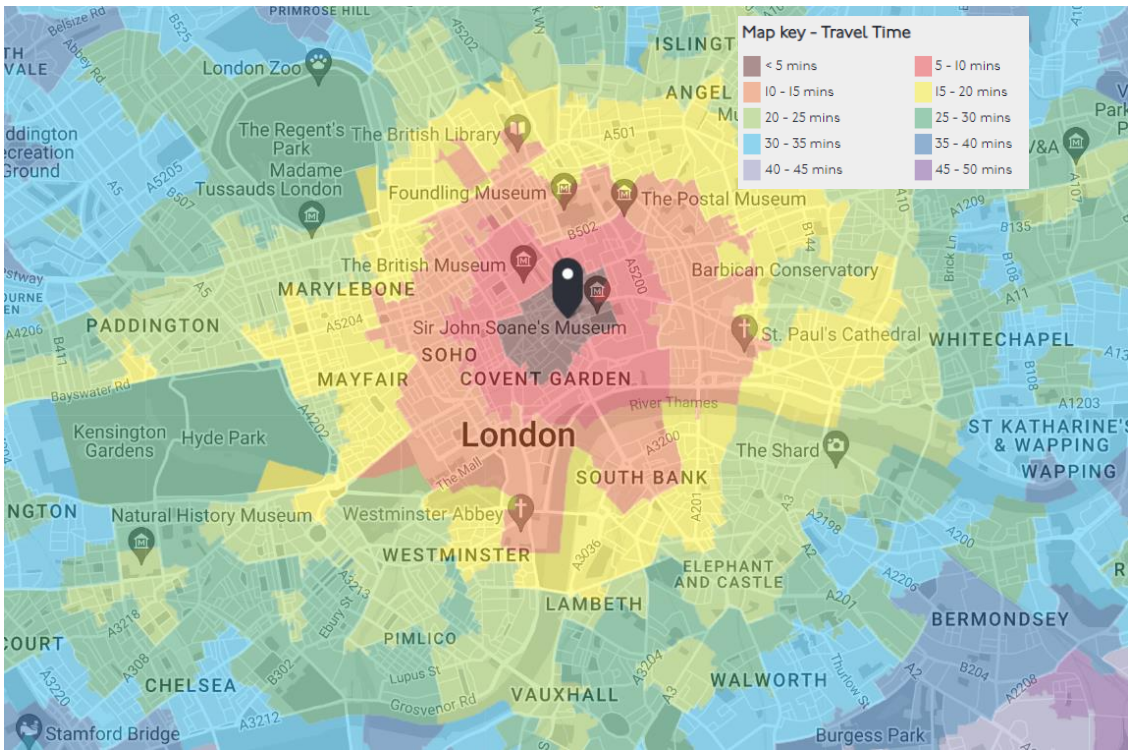
3.3.8 Charing Cross Rail Station is located 1.2km (15 minutes walking) south of the site, it offers onward travel south of the river Thames to destinations such as Dartford, Ashford, Dover, Gravesend, Hayes, Sevenoaks, Tonbridge and Tunbridge.

PUBLIC TRANSPORT TIME MAPPING

3.3.9 Time Mapping (TIM) is a tool developed by TfL within their WebCAT suite of tools to assess connectivity in terms of travel times, taking account of public transport service ranges and interchange opportunities. Time Mapping by public transport during the AM peak is presented in **Figure 3-6.**

3.3.10 This shows that within a 5 - 10 minute walking radius of the site, areas such as the Barbican, Bloomsbury and Westminster can be accessed. Furthermore, within a 15 – 20 minute walk, the Southbank, Angel and Mayfair can be accessed.

Figure 3-6: Public Transport TIM Mapping



3.4 SUMMARY

3.4.1 There is an established network of footways and pedestrian connections surrounding the site, including crossing facilities with tactile paving and a number of cycle ways, providing safe cycle routes across London. Furthermore, the site is located near to a range of public transport options and has a PTAL of 6b (excellent), demonstrating excellent public transport accessibility.

4 BASELINE HIGHWAY NETWORK

4.1 ROAD NETWORK

4.1.1 The site is located on Parker Street a local road for which the LB Camden is the Highway Authority. The nearest part of Transport for London's Road Network (TLRN) is the A3211 Victoria Embankment, located 700 metres to the south of the site, shown within **Figure 4-1**.

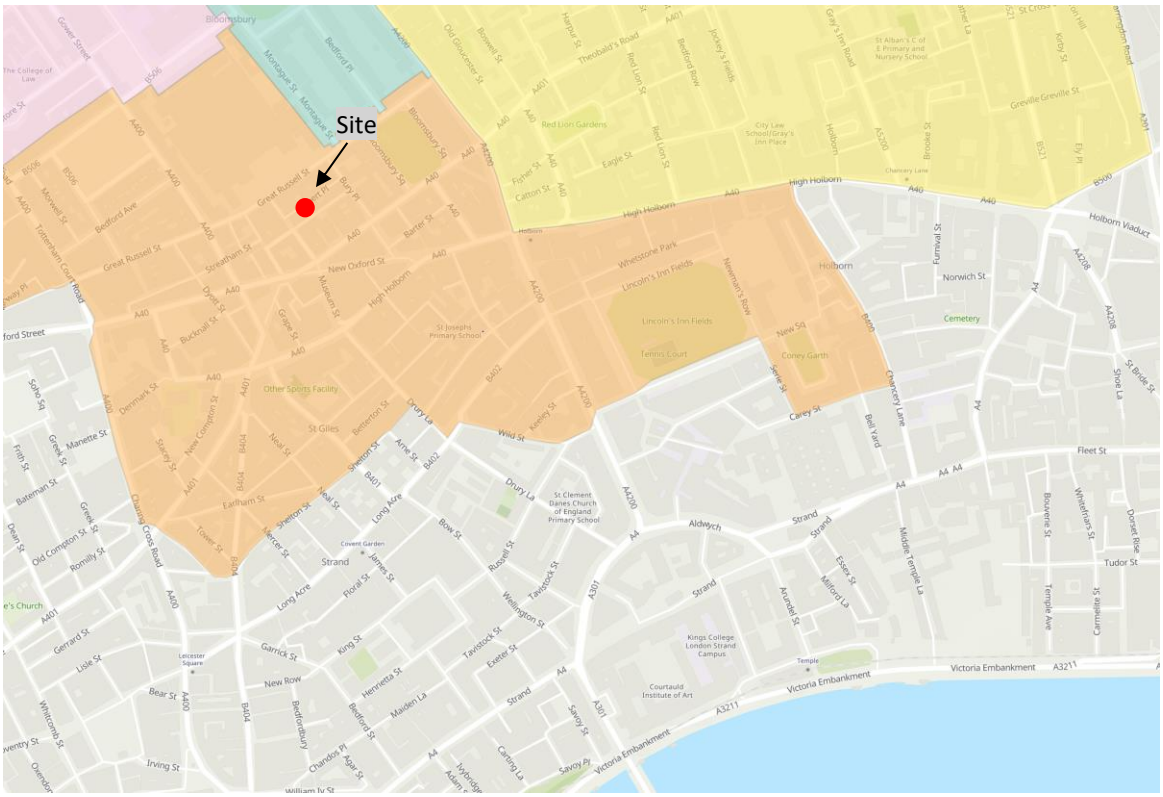
4.1.2 Newton Street operates in a one way direction in the vicinity of the site, with vehicles travelling northbound only immediately east of the site, and southbound only, south of the site. Parker Street in front of the site operates as a two way road but becomes one way westbound to the east of the site after its junction with Newton Street.

Figure 4-1: Local Road Network

4.2 PARKING AND LOADING PROVISIONS AND RESTRICTIONS

4.2.1 **Figure 4-2** below shows an extract of the LB Camden CPZ Map, the site is located within Controlled Parking Zone 'CA-C', which operates from Monday to Friday: 8:30am – 6:30pm and Saturday: 8:30am – 6:30pm.

Figure 4-2: Local CPZs



4.2.2 There are a number of pay and display bays on Parker Street along with stretches of yellow line which provide opportunity for parking and loading near to the site.

4.2.3 Any vehicle may load or unload for up to 20 minutes within a resident permit bay or paid for parking bay. Loading or unloading can also take place on single or double yellow lines (without kerb markings) for an unlimited time before 11:00 and after the end of controlled hours or 18:30 (whichever is earlier). After 11:00 and until the end of controlled hours or 18:30 (whichever is earlier), heavy goods vehicles (3.5 tonnes and above) can load or unload for up to 40 minutes, cars and light goods vehicles for up to 20 minutes.

5 ACTIVE TRAVEL ZONE ASSESSMENT

5.1.1 This Active Travel Zone (ATZ) Assessment has been carried out in line with the TfL Transport Assessment guidance, which aims to show how the proposed development supports Vision Zero and the Healthy Streets policies.

5.1.2 There are three parts to the ATZ assessment process, which are as follows:

- **Map One**: The ATZ and potential key active travel destinations;
- **Map Two**: Neighbourhood safety and the most important journeys with supporting text, including a vision zero analysis and safety improvement ideas;
- **Neighbourhood Photo Survey**: ATZ neighbourhood key routes check based on the Healthy Streets indicators.

NEIGHBOURHOOD PHOTO SURVEY

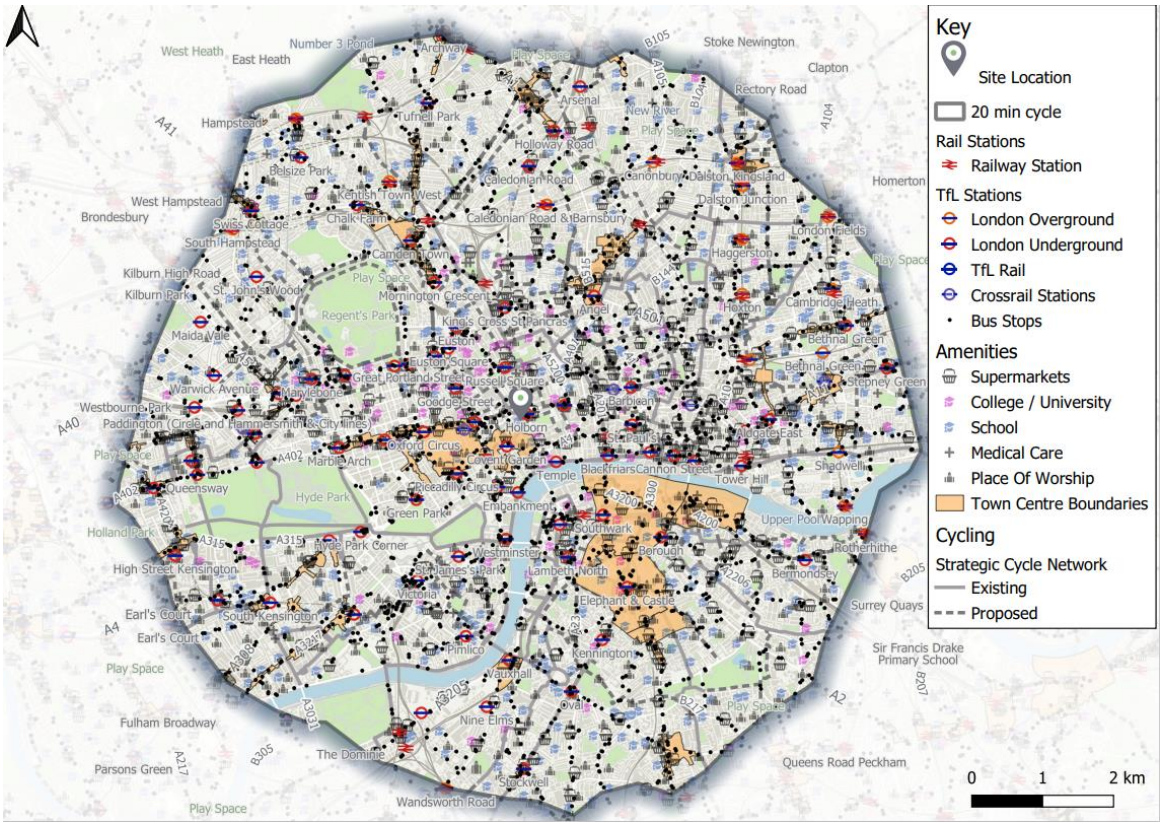
5.1.3 The Neighbourhood Photo Survey site visit was undertaken on Thursday 29th June 2023 between 13:00 – 15:00. Throughout the site visit, consideration was given to how pedestrians/cyclists may feel about travelling via the key routes during evening hours.

ACTIVE TRAVEL ZONE

5.1.4 **Figure 5-1** is the initial map required as part of the ATZ guidance. This shows potential key destinations, as determined by the guidance, that are within the ATZ. These include:

- Public transport stops and stations;
- London's current and future London-wide strategic cycle network;
- Town centres;
- Parks/green space;
- Schools/colleges/universities;
- Medical care facilities (including hospitals and general practitioners); and
- Places of worship.

Figure 5-1: Active Travel Zone Map 1



5.1.5 **Figure 5-1** shows that large parts of London could be easily walked or cycled to from the site, and many key destinations for future users of the site are within a 20-minute walk or cycle.

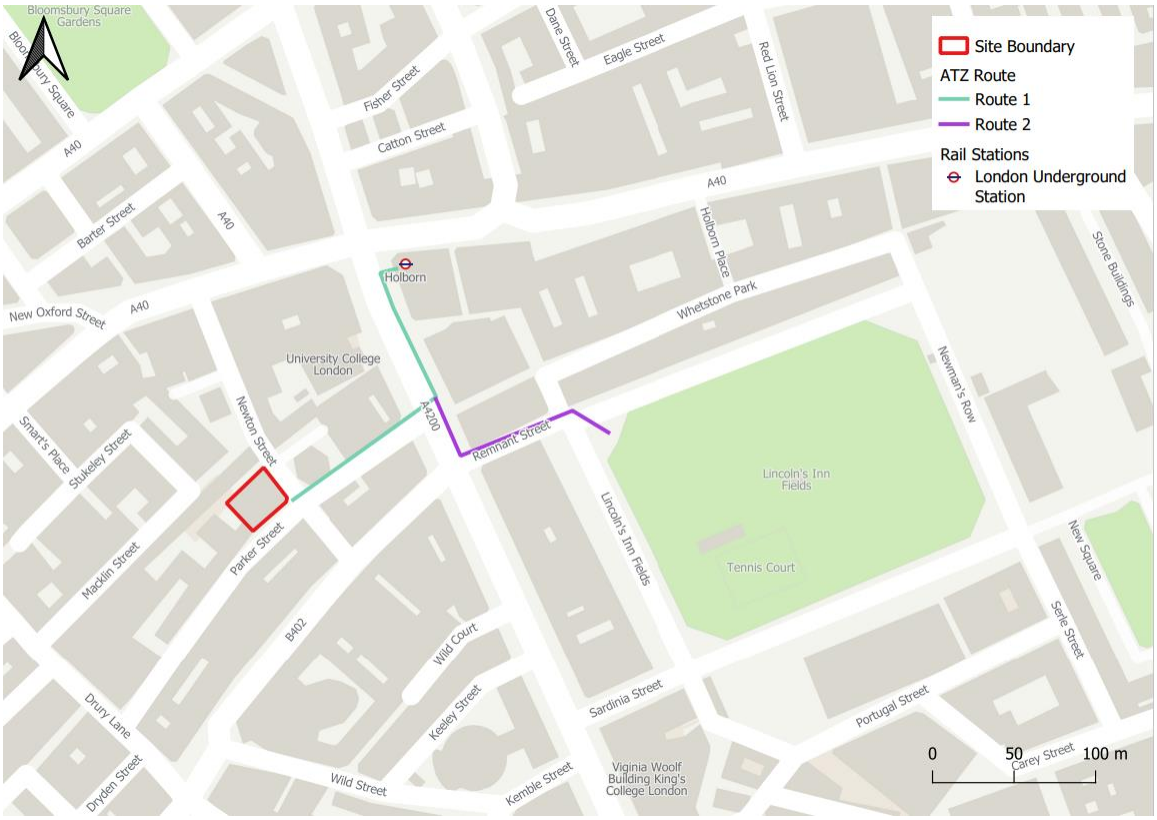
5.1.6 The map shows that multiple amenities and facilities are within a 20-minute cycle catchment; these include green spaces, transport services (i.e. bus and rail), the existing and proposed cycle network, shopping facilities as well as places for leisure and worship.

ATZ NEIGHBOURHOOD – KEY DESTINATIONS

5.1.7 For the purpose of this ATZ assessment, two key routes have been plotted, which cover a number of key destinations, namely Holborn London Underground Station and Lincoln's Inn Fields (an area of green space).

5.1.8 The neighbourhood-scale map and routes to key destinations are set out in **Figure 5-2.**

Figure 5-2: Neighbourhood Zone Map 2



5.1.9 As can be seen in Map Two **(Figure 5-2**), two key routes have been identified. The destinations have been grouped into the following routes:

- **Key Journey One**: Holborn London Underground Station.
- **Key Journey Two**: Lincoln's Inn Field.

5.2 ATZ KEY ROUTE ASSESSMENT

5.2.1 As per the ATZ guidance, a site visit was undertaken to assess each of the key routes identified as part of the desk-based stages of the ATZ assessment. These routes have been walked and cycled to understand the quality of the most important active travel routes from the site. The site visit took place between 13:00 – 15:00 on 29th June 2023.

5.2.2 During the site visit, the worst point of each route was identified. 'Worst' is defined as that deemed to be the most unpleasant or potentially unsafe part of a route for pedestrians and/or cyclists.

5.2.3 The worst part of each route has been reviewed and assessed against eight of the 10 Healthy Streets Criteria (criteria 3 – 10), in line with TfL's ATZ and Healthy Streets TA Guidance. The following eight criteria have been assessed:

- Easy to cross.
- People feel safe.
- Things to see and do.
- Places to stop and rest.

- People feel relaxed.
- Not too noisy.
- Clean air.

KEY ROUTE 1

5.2.4 Route 1 connects the site with Holborn London Underground Station and passes a variety of commercial units and amenities on the route. The route is approximately 250m in length and is well-connected to transport facilities and local amenities. The route is well equipped for pedestrians and cyclists with crossing facilities and cycle facilities provided. There are multiple things to see and do, including retail units, and cycle parking is provided along the A4200 Kingsway as well as in proximity to Cycleway 52, where a Santander docking station is located on Newton Street. This route is expected to be perceived to be safe due to the high footfall and passive surveillance provided.

5.2.5 The worst part **(Figure 5-3),** was identified as the narrow footway on the southern side of Parker Street which poses a safety issue between pedestrians walking and oncoming vehicular traffic, which is compounded by high footfall together with high levels of vehicular traffic.

5.2.6 This area could be improved by widening the footway or providing guard railing to ensure greater safety for pedestrians walking. However, it is noted that the size of the issue is too significant to be resolved by the proposed scheme, and would require highways land.

5.2.7 **Table 5-1** assesses the worst part of the route against eight of the 10 Healthy Streets Criteria.

Figure 5-3: Key Route 1 – Worst Point – Parker Street Southern Footway

Table 5-1: ATZ Assessment Route 1 | Healthy Streets Indicator Analysis

HEALTHY STREETS INDICATOR	INDICATOR MET?	REASONING	SUGGESTED IMPROVEMENT
Easy to cross	Yes	Within proximity to this point informal junction crossings are equipped with tactile paving and dropped kerbs. The Narrow carriageway width and one-way system heading westbound on Parker Street allows for a shorter and safer crossing.	N/A
People feel safe	No	This section of the route has a moderate level of vehicular traffic. The narrow southern footway on Parker Street puts pedestrians at risk of being involved in a collision with oncoming vehicles. This is compounded due to larger vehicles using this road for site deliveries.	A wider footway would ensure greater pedestrian safety when walking. However this would require the use of third party highway land, which is outside of the scope of this application.
Things to see and do	Yes	Whilst this point is overlooked by a combination of residential properties and office buildings, within a short walking distance there are plentiful retail opportunities provided along the length of the A4200 Kingsway.	N/A
Places to stop and rest	No	There are no places to stop and rest at this point.	Public seating may not be appropriate in this area due to the high pedestrian flows on street.
People feel relaxed	Partial	Due to the presence of larger goods vehicles, the moderately trafficked nature of the road and a narrow southern footway, people do not feel relaxed along this section of the road.	Additional street trees on low level planters could be provided in the area to provide pedestrian separation, noise barrier, improve air quality and provide shade and shelter. This would require third party highways land, which is outside of the scope of this application.
Not too noisy		Due to the nature of the road, there are heightened levels of noise at this location.	
Clean air		According to the London Air Quality Network, this section of the route fails the annual mean objective for NO2 air pollution.	
Shade and shelter		Overshadowing from surrounding buildings to the north and south provide shade and some shelter.	

KEY ROUTE 2

5.2.8 Route 2 connects the site with Lincoln Inn Field's via the A4200 Kingsway and Remnant Street.

5.2.9 The route is approximately 250m in length and is well accommodated for pedestrians and cyclists, with wide footways, crossing facilities and advanced cycle stop lines at crossings. There are multiple things to do, as well as seating and cycle parking facilities in the form of Sheffield stands and a Santander docking station adjacent to Lincoln Inn Field's. This route is expected to be perceived to be safe due to the high footfall and passive surveillance provided.

5.2.10 The worst part **(Figure 5-4),** was identified as an informal crossing on Lincoln's Inn Field which is positioned in accordance with a pedestrian desire line, however, it lacks tactile paving on the western side of the crossing. This area could be improved by tactile paving to ensure mobility impaired users and those pushing buggies can cross safely and conveniently.

5.2.11 **Table 5-2** assesses the worst part of the route against eight of the 10 Healthy Streets criteria.

Figure 5-4: Key Route 2 – Worst Point – Informal Crossing on Lincoln Inn Field's

Table 5-2: ATZ Assessment Route 1 | Healthy Streets Indicator Analysis

HEALTHY STREETS INDICATOR	INDICATOR MET?	REASONING	SUGGESTED IMPROVEMENT
Easy to cross	No	The informal crossing point lacks tactile paving on the western side of the crossing making it difficult for mobility impaired road users to cross safely.	Provide tactile paving on the western side of the crossing.
People feel safe	Yes	This section of the route has a moderate level of vehicular traffic, however, a high pedestrian footfall and congregation of people within Lincoln's Inn Field provides passive surveillance.	N/A
Things to see and do	Yes	Numerous amenities are provided within Lincoln's Inn Field such as a restaurant and tennis courts and there are a variety of mature trees within open green space which is visually appealing.	N/A
Places to stop and rest	Yes	Plentiful public seating is provided within Lincoln's Inn Field and Sheffield stands and a Santander docking station are situated adjacent to the primary access point allowing commuting cyclists to stop and rest.	N/A
People feel relaxed	Yes	This point features wide footways and the roads are generally well maintained and clean. A variety of mature trees and open green space is provided within Lincoln's Inn Field.	N/A
Not too noisy	Partial	Due to the nature of the road, there are heightened levels of noise at this location.	Street trees planted along the route provide noise barrier, clean the air and provide shade and shelter. Additional street trees could be provided to further improve the routes assessment against these indicators.
Clean air		According to the London Air Quality Network, this section of the route fails the annual mean objective for NO2 air pollution.	
Shade and shelter		Within Lincoln's Inn Field there are a variety of mature street tress which provide shade and shelter onto the footway.	

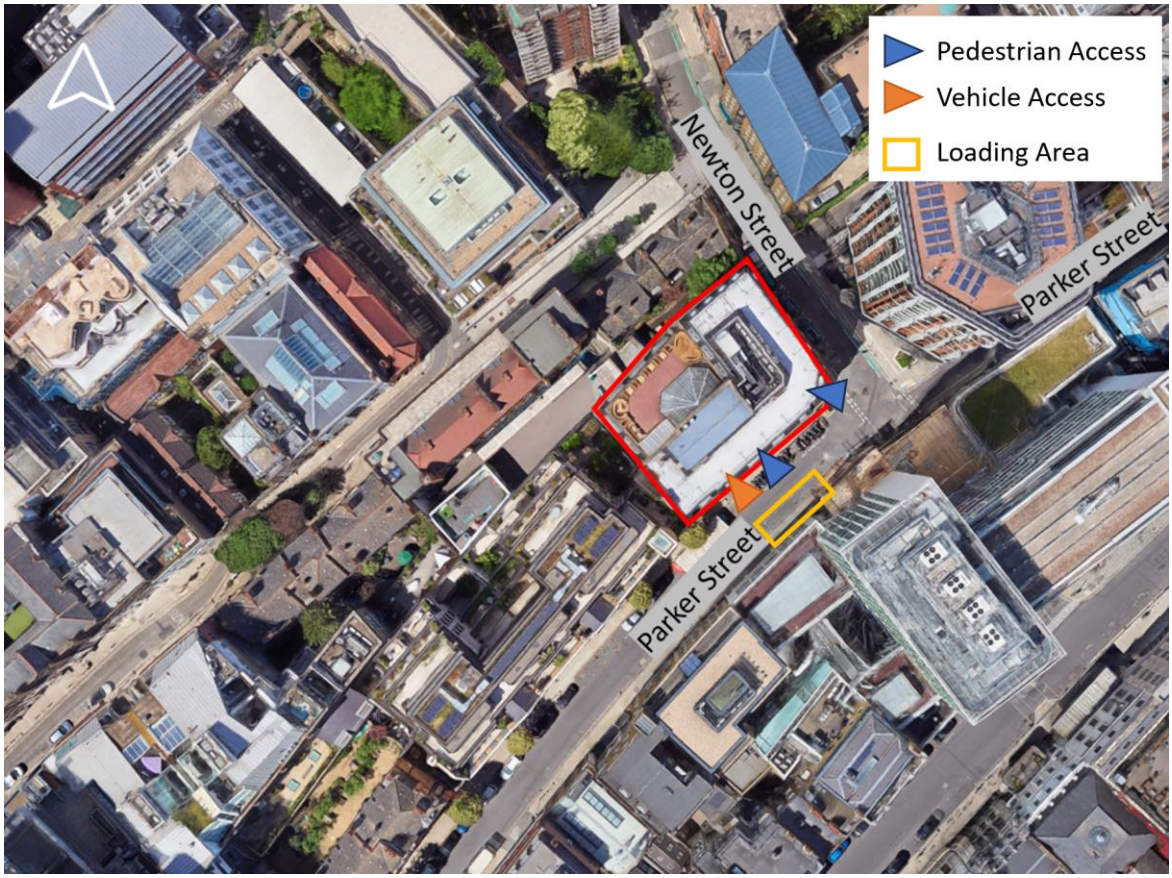
HEALTHY STREETS INDICATOR	INDICATOR MET?	REASONING	SUGGESTED IMPROVEMENT
		However, at this particular point there is limited shade and shelter.	

6 EXISTING SITE OPERATIONS

6.1 EXISTING ACCESS

6.1.1 Pedestrian access is gained from the building's entrances on Parker Street and Newton Street. **Figure 6-1** shows the existing access locations. Delivery and servicing activity associated with the existing office predominantly takes place on-street opposite the site, whilst vehicular access for the cinema is provided via Parker Street to basement level.

Figure 6-1: Existing Access Locations



6.1.2 The existing access arrangements are illustrated on photos in **Figure 6-2.** The main entrance is located on the north-west junction of Parker St and Newton Street.

Figure 6-2: Existing Building Entrances

MAIN ACCESS (NEWTON STREET/PARKER STREET)

GARDEN CINEMA PARKER STREET PEDESTRIAN AND VEHICLE ACCESS

7 PROPOSED TRANSPORT STRATEGY

7.1 INTRODUCTION

7.1.1 The proposals consist of the change of use of the existing building at first, second and third floor levels to provide studio and teaching space for the London Film School. In addition, a third cinema screen would be introduced, predominantly for use by the school. No structural changes would be made to the building, as the proposals entail internal works only. The following facilities would be provided:

- Film Studios;
- Camera, Lighting and Sound Equipment Stores;
- Teaching Rooms;
- Editing and Sound Studios; and
- Cinema Screen.

7.1.2 The school would operate broadly on the following basis. Starting at the end of September, there would be three terms in an academic year, each 13 weeks long with a break in-between (September - December, January – April, May – July).

7.1.3 During the 39 weeks of term time, the teaching hours are limited to:

- Monday – Friday between 1000 and 1700 (As a consequence, most of the staff and students are onsite between 0930 and 1730 Monday - Friday)

7.1.4 During the 39 weeks of term time, our broader operating hours where the building will be open to staff and students but with no teaching and a limited service, are:

- Monday – Sunday between 0800 and 2300 (excluding bank holidays).

7.1.5 Academic and Professional services staff numbers total to 85 excluding occasional visiting lecturing staff. Within term time, the typical daily total onsite is 40 (Monday – Friday).

7.1.6 Student numbers are 250 at any given time. Within term time the typical daily onsite is 125 (Monday – Friday).

7.1.7 Visitor total average is 10 per day (Monday- Friday).

7.1.8 A typical weekday at LFS is: class 1000 – 1300, lunch break 1300 – 1400, class 1400 – 1700.

7.2 ACCESS

7.2.1 Existing access arrangements would be retained, with students and staff accessing the site using the existing entrance on the corner of Parker Street and Newton Street. This access would be secured by a card system that would enable access to staff and students.

7.3 DELIVERIES AND SERVICING

EXISTING ARRANGEMENTS

7.3.1 Currently, servicing associated with the office takes place on street with no formal loading or servicing area provided. Loading and unloading therefore typically takes place using a stretch of yellow line marking on Parker Street which enables legal loading and unloading.

PROPOSED ARRANGEMENTS

7.3.2 The existing servicing arrangements would be retained, with vehicles stopping adjacent to the site on Parker Street and loading using the stretch of yellow line marking.

7.3.3 There is estimated to be in the order of 6 vehicles attending the school on average per day to account for deliveries, refuse collections, cleaning, etc. Waste would be collected under a private contract agreement.

7.3.4 Office developments generally generate 0.406 servicing movements per day, based on data extracted from the TRICS database (sites selected are the same as those used in the existing trip generations section). Using this metric, the site would generate a total of 8 servicing movements per day. This generation in servicing movements is marginally more than what is expected to be generated by the proposed development, and therefore, there is considered to be no impact in this regard.

7.4 CAR PARKING

7.4.1 No car parking is proposed for the London Film School, in accordance with London Plan and Camden Local Plan policy requirements. This is considered appropriate given the location of the site.

7.5 CYCLE PARKING

7.5.1 Cycle parking standards are set out in the London Plan whilst Camden Planning Guidance for Transport states that the Council will seek an additional 20% cycle parking provision above the London Plan requirements.

7.5.2 As the proposals relate to the change of use of the building, predominantly at upper levels, the ability to provide cycle parking, in accordance with standards, is limited. Furthermore, it is understood that cycle parking demand at the existing school is low and at a level less than cycle parking standards require. As such, it is proposed that the London Film School will monitor demand and seek to dedicate storage areas, where possible, within the building as appropriate for staff. For students, similar provision will be explored, however, given the constraints of the site, it may be considered more appropriate to provide a contribution towards providing short-stay spaces in the local area.

8 TRAVEL DEMAND

8.1 INTRODUCTION

8.1.1 This section quantifies existing and proposed travel demand to determine the likely scale of the effect associated with the change of use.

8.2 EXISTING TRIP GENERATION

8.2.1 The existing office associated with the change of use provides approximately 2,045 sqm (GEA) of floorspace. Based on approximately 1 employee per 10sqm of floorspace, the existing floorspace is likely to be able to accommodate in the order of 205 employees.

8.2.2 A peak hour trip generation assessment has been carried out for the existing office floorspace (2,045 sqm GEA) using sites selected from the TRICS database. Sites were selected using the following criteria.

8.2.3 TRICS sites have been selected based on the following criteria and are summarised in **Table 8-1.**

- Location: Greater London
- PTAL: 6a-6b
- Survey Date 2016 – 2019
- Land use: Employment – Office

Table 8-1: Selected TRICS Office Sites

REFERENCE	LOCATION	PTAL	FLOOR AREA (SQM GFA)	SURVEY DATE
CN-02-A-03	Fitzrovia	6b	26,639	06/12/17
HM-02-A-01	Hammersmith	6b	2,036	13/11/17
LB-02-A-01	Vauxhall	6b	10,200	11/19/18
LB-02-A-02	Streatham	6a	3,054	05/11/19

8.2.4 The resultant trip rates extracted from the TRICS database for the peak hours are shown in **Table 8-52.**

Table 8-2: Office Total Person Trip Rates

PERSON TRIPS	AM PEAK HOUR (08:00-09:00)			PM PEAK HOUR (17:00-18:00)		
	In	Out	Total	In	Out	Total
Trip Rates	2.95	0.30	3.25	0.21	2.75	2.96

MODE SHARE

8.2.5 The mode share for the existing office use has been extracted from the 2011 Census Method of Travel to Work for the surrounding area. Given the highly accessible location of the site, the car driver/car passenger trips have been distributed to the other modes pro-rata. **Table 8-3** shows the census mode share and adjusted mode share for the existing development. The majority of trips are expected to be undertaken by active modes or public transport.

Table 8-3: Forecast Mode Share

MODE	EXISTING MODE SHARE (2011 CENSUS) %	ADJUSTED FORECAST MODE SHARE %
Underground	37	37
Train	35	35
Bus	11	11
Taxi	0	0
Motorcycle	1	1
Car/ Van Driver	5	0
Car/ Van Passenger	0	0
Bicycle	6	9
On Foot	5	8
Total	**100**	**100**

*Numbers may not sum due to rounding

EXISTING DEVELOPMENT TRAVEL DEMAND

8.2.6 The resultant trips split by mode, for the existing development during peak hours are shown below in **Table 8-4.**

Table 8-4: Existing Trips

MODE	MODE SHARE	AM (8-9AM)			PM (5-6PM)		
		In	Out	Total	In	Out	Total
Underground	37%	22	2	24	2	21	22
Train	35%	21	2	23	1	20	21
Bus	11%	7	1	7	0	6	7
Taxi	0%	0	0	0	0	0	0
Motorcycle	1%	1	0	1	0	1	1
Car/ Van Driver	0%	0	0	0	0	0	0
Car/ Van Passenger	0%	0	0	0	0	0	0
Cycle	9%	5	1	6	0	5	5
On Foot	8%	5	0	5	0	4	5
Other	0%	0	0	0	0	0	0
Total	**100%**	**60**	**6**	**67**	**4**	**56**	**61**

*Numbers may not sum due to rounding

8.3 PROPOSED TRIP GENERATION

8.3.1 A first principles approach has been used to calculate the travel demand of the site, and has been based on data provided by the London Film School. This methodology is considered to be best placed to provide a robust trip generation assessment.

8.3.2 The trip generation exercise has been carried out based on the following information:

- Students: 250 students overall, with 125 students within the building on average;
- Academic and professional staff: 85 overall, with 40 staff members within the building on average;
- The LFS operates teaching hours of 10am – 5pm Monday to Friday; and
- On average 10 visitors access the site per day.

8.3.3 The above suggests that there would be typically 175 people on-site during the day, which is considered less than the existing office. However, for the purpose of this assessment, a review of peak hour travel has been undertaken. As such, in addition to using the above data, the following assumptions have been made:

- Average occupancy rates for staff and students have been used to calculate the likely trip generation for the site;
- 85% of staff and students are expected to access the site for the first teaching hour (10am) and leave after the final hour (5pm), with 5% of staff and students travelling against the peak flows; and
- Ten visitors are presumed to access the site daily.

8.3.4 The total person trip rates for the peak hours are shown in **Table 8-5.**

Table 8-5: School Total Person Trip Rates

PERSON TRIPS	AM PEAK HOUR (09:00-10:00)			PM PEAK HOUR (17:00-18:00)		
	In	Out	Total	In	Out	Total
Trip Rates	149	9	158	9	149	158

MODE SHARE

8.3.5 The 2011 Census has been examined to establish the method of journey to work for employees in the area (associated with the longest part of their journey). This indicates that, in the Middle Layer Super Output Area, 83% of employees use public transport, and 11% of employee's movements are undertaken by active modes of travel.

8.3.6 The employee mode shares are considered suitable to apply to staff and students for the purpose of this assessment. However, as the proposed development would not be served by parking, the car driver/car passenger trips have been reallocated toward walking and cycling, which are considered to be likely modes for staff and students.

8.3.7 **Table 8-6** shows the census mode share and adjusted mode share for the proposed development. The majority of trips are expected to be undertaken by active modes or public transport.

Table 8-6: Forecast Mode share

MODE	EXISTING MODE SHARE (2011 CENSUS) %	ADJUSTED FORECAST MODE SHARE %
Underground	37	37
Train	35	35
Bus	11	11
Taxi	0	0
Motorcycle	1	1
Car/ Van Driver	5	0
Car/ Van Passenger	0	0
Bicycle	6	9
On Foot	5	8
Total	**100**	**100**

*Numbers may not sum due to rounding

PROPOSED DEVELOPMENT TRAVEL DEMAND

8.3.8 **Table 8-7** shows the expected travel demand associated with the proposed development.

Table 8-7: Proposed Travel Demand by Mode

MODE	MODE SHARE	AM (9-10AM)			PM (5-6PM)		
		In	Out	Total	In	Out	Total
Underground	37%	55	3	58	3	55	58
Train	35%	52	3	55	3	52	55
Bus	11%	16	1	17	1	16	17
Taxi	0%	0	0	0	0	0	0
Motorcycle	1%	1	0	2	0	1	2
Car/ Van Driver	0%	0	0	0	0	0	0
Car/ Van Passenger	0%	0	0	0	0	0	0
Cycle	9%	13	1	14	1	13	14
On Foot	8%	12	1	13	1	12	13
Total	**100%**	**150**	**9**	**159**	**9**	**150**	**159**

*Numbers may not sum due to rounding

8.3.9 The proposed development will result in 55 train journeys in the AM and PM Peak, along with 58 underground trips in the AM and PM Peak and 17 bus trips in the peak hours. The proposed development will also result in 14 cycle journeys in the peak hours.

8.4 NET TRIP GENERATION ASSESSMENT

8.4.1 The LFS will accommodate in the order of 175 people on the site each day, whereas the existing office is considered to have the potential to accommodate circa 205 people. As such, the number of daily trips associated with the change of use is not expected to significantly differ. However, the trip generation assessment suggests that the school could generate more arrivals and departures in the peak hours as it assumes the large majority of school trips would take place in one given hour.

8.4.2 **Table 8-8** shows the net increase in trip generation on site, due to the proposed change of use.

Table 8-8: Net Trip Generation

MODE	AM (9-10AM)			PM (5-6PM)		
	In	Out	Total	In	Out	Total
Underground	33	1	34	1	34	36
Train	31	1	32	2	32	34
Bus	9	0	10	1	10	10
Taxi	0	0	0	0	0	0
Motorcycle	0	0	1	0	0	1
Car/ Van Driver	0	0	0	0	0	0
Car/ Van Passenger	0	0	0	0	0	0
Cycle	8	0	8	1	8	9
On Foot	7	1	8	1	8	8
Total	90	3	92	5	94	98

*Numbers may not sum due to rounding

8.5 IMPACT ASSESSMENT

PUBLIC TRANSPORT

8.5.1 The site is located within a central London location and in close proximity to several public transport services. It also achieves a PTAL rating of 6b, the highest score possible, and therefore, presuming trips are distributed evenly between local services, the trip generation associated with the site is considered to have a negligible impact on the public transport network.

PEDESTRIAN IMPACT

8.5.2 The site is located in between Covent Garden and Holborn London Underground Stations, as well as near to a number of bus stops. It is therefore considered that pedestrians accessing the site would approach the site from all directions due to the volume of public and active transport facilities available. Given the site's location in Central London, and established street network surrounding the site, the additional pedestrians in peak hours, are not considered to have a significant impact on the area.

9 SUMMARY AND CONCLUSIONS

9.1.1 Velocity Transport Planning has been appointed by the London Film School to prepare this Transport Statement in support of the change of use proposals associated with 39 – 41 Parker Street, situated within the London Borough of Camden.

9.1.2 In summary:

- **Accessibility:** the site is located in a highly accessible, Central London location, in close proximity to several public transport services. As such, it lends itself to travel by non-car modes;
- **Access:** the site will retain accesses as existing, with no changes made to the building;
- **Car Parking:** The school will not be served by any car parking which is considered in accordance with standards and considered appropriate given the location of the site;
- **Cycle parking:** given the nature of the change of use proposals, the ability to provide appropriate cycle parking in accordance with standards is limited, therefore, LFS will seek to accommodate cycle parking demand on-site where possible and provide a contribution towards short-stay spaces in the local area;
- **Servicing:** Servicing would take place on street in the same manner as the existing building. Servicing demand will be slightly reduced compared to the existing office use, and, therefore, there is no associated impact in this regard; and
- **Trip Generation:** The number of people on-site at any one time is not anticipated to significantly differ as a result of the change of use. Furthermore, all trips are expected to be undertaken by non-car modes. Given the local public transport network has significant station and service capacity, any changes in travel demand are expected to be accommodated without a perceptible impact**.**

9.1.3 Based on the above, the proposals are therefore considered acceptable in transport terms.