

From:
Sent: 19 January 2024 12:10
To: Kristina Smith
Cc: Planning
Subject: 2022/5320/P - Former Mansfield Bowls Club
Attachments: Consultation Response Note - Additional Transport Information - Former Mansfield Bowls Club.pdf

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Good Afternoon Kristina

Please see attached representation in relation to the above planning application, which relates to the further transport information provided by the applicant.

Kind Regards
Matt

Urbanspace Planning Limited (USP) and Transport Planning Associates (TPA) has now had an opportunity to review the further and updated transport documents prepared and submitted to the Council as part of the above planning application for the former Mansfield Bowling Club site.

Overall, it is evident that the conclusions provide an overly optimistic response and does not adequately address the lack of parking and key transport policy requirements for the site. We would expect the London Borough of Camden (LBC) to take a pre-cautionary approach to these matters and the onus should be on the applicant to provide the evidence base upon which judgement can be made, not the local residents. At present insufficient evidence continues to be provided by the applicant to demonstrate that the proposal is acceptable in transport and highway terms and fails to meet Development Plan policies in this regard.

It is noted from §3 (on the first page) that the proposed parking provision has been reduced from seven spaces to five. The 'Proposed Site Plan' at Appendix B is not particularly clear (or well annotated) but it appears to show five disabled parking spaces (indicated by the easement between them) but is inconsistent with the statement made in §12 (on page 4) that "5 staff members would park on-site". That inconsistency is misleading and should be explored, explained and the resulting impact on overall parking provision addressed appropriately.

The Caneparo response to the TPA observation that the application site benefits from a PTAL of 2 is to note that "the adjacent section is defined as a PTAL 4". Whilst sites in the wider area may have different accessibility levels, it is evident that the PTAL for the site is 2. Considering "adjacent" areas of accessibility does not follow the underlying methodology or application or the calculation of PTAL, whilst the arbitrary selection of one adjacent PTAL area does not provide a robust or accurate assessment of the accessibility of the site. Consideration of the site accessibility, impact of the development on transport and highways, and parking requirements needs to be based on that relating to the site, not those adjacent which will subject to different assessment and consideration.

In any event, reduced on-site parking is going to further increase on-street parking stress.

Caneparo are critical (at §§14, 22 and 26) of the TPA parking stress survey saying that "for commercial developments, a 500m walking distance would be acceptable and therefore if the scope of the surveys were extended, it is most probable that there would be additional spaces". This is not an appropriate basis for assessment of this residential care proposal. Firstly, it is not appropriate to characterise a care home as a "commercial development" in these terms – the proposal will be occupied by residents, with visitors, not employees and shoppers. Second, and fundamentally, it is incumbent on the applicant to make its case rather than to speculate on what may or may not be the parking stress status of a wider geographical area. The TPA parking stress survey provides a clear and appropriate assessment of parking provision and utilisation in the area and clearly demonstrates the lack of availability for additional capacity to account for the on-street parking that the proposed

use will delivery as a result of the density of the proposal and lack of on-site parking for staff and visitors.

Finally, and regardless of the status of the proposed on-site car parking provision (i.e. designated for use by disabled persons, or not), the level provided is clearly not suitable to support the use and scale of development proposed on site. Further reductions of car parking in a location where access to local bus services has declined; where there is limited local services in walking distance and alternative transport modes; will inevitably and logically lead to an increase in parking stress in the vicinity of the site, which it has been demonstrated it is unable to support.

The additional information fails to satisfactorily address the transport and highways impact of the development and does not demonstrate compliance with the policies of the Development Plan.