MAY 2025

Intelli-Park Car Park, Parker Mews

Transport Statement

ICENI PROJECTS LIMITED
ON BEHALF OF CP CO 13
LIMITED

Iceni Projects Limited on behalf of
CP CO 13 Limited

May 2025

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1. INTRODUCTION

Overview

1.1 This Transport Statement (TS) has been prepared by Iceni Projects on behalf of CP CO 13 Limited ('the Applicant') to support a planning application for a self-storage development situated within he former Intelli-Park London Covent Garden car park facility, at Parker Mews, WC2B 5NT. The site is situated within the administrative jurisdiction of the London Borough of Camden (LBC), who are the acting local planning and highway authority.

1.2 The proposal seeks the change of use from Sui Generis to Use Class B8 (Storage and Distribution) to deliver the following description of development.

"*Change of use of the basement carpark from Sui Generis to B8 (self-storage)"*

Executive Summary

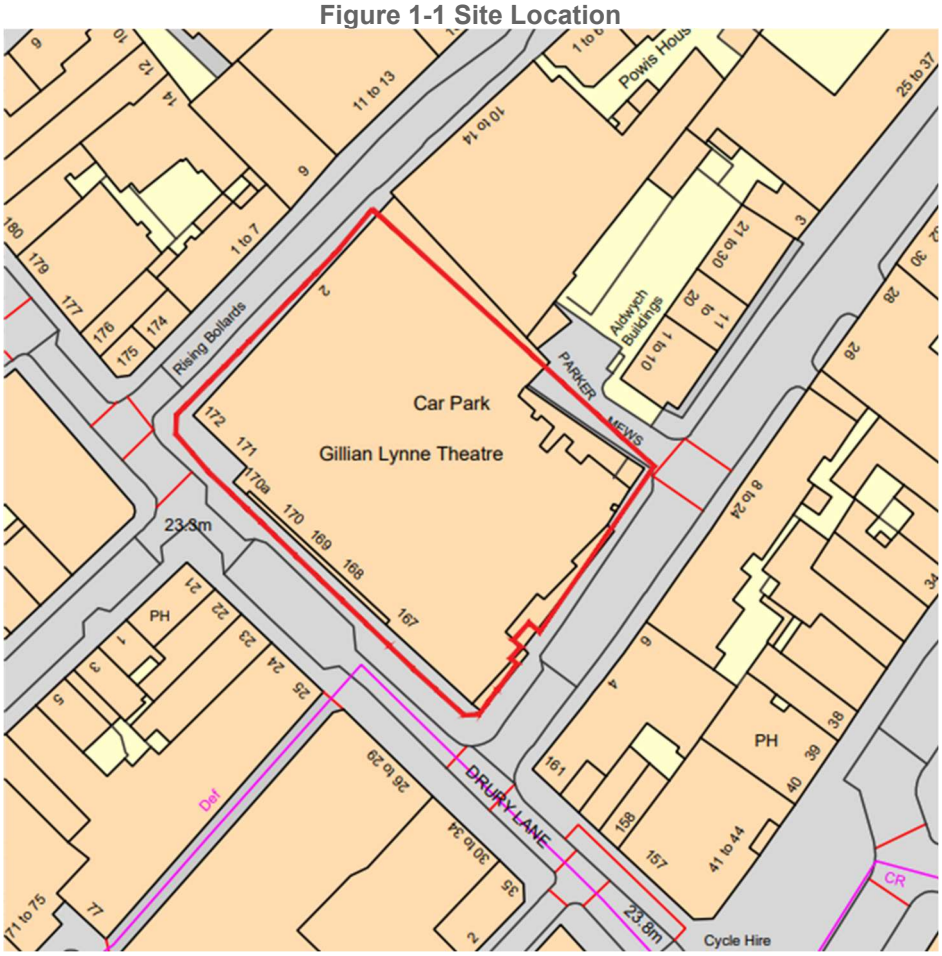
1.3 The proposals reduce the existing car park capacity from no.327 to no.151 spaces to deliver a B8 storage use within the lower levels of the existing Site. Repurposing part of the car park not only meets the demand for storage space within the city but also contributes to a more sustainable and functional urban environment.

1.4 Furthermore, the site's Central London location means that it is well served by public transport nodes, which in turn will ensure minimal disruption to traffic patterns locally, particularly as self-storage operations typically generate lower vehicular movements compared to both the existing and other potential commercial uses.

Site location

1.5 The site's location is demonstrated broadly in red on **Figure 1-1**, with the proposed development layout provided at **Appendix A1**.

Figure 1-1 Site Location



Report Structure

1.6 This TS therefore sets out the following chapters:

- **Section 2 Planning Policy**

  This Section sets out the relevant National and Local relevant planning policy and considers how the proposed development complies with this.

- **Section 3 Existing Situation**

  This Section outlines the local context within which the site is located, inclusive a review of the local road network and sustainable transport connectivity.

- **Section 4 Development Proposals**

  This Section describes the proposed development, including matters relating to access, layout, car parking, cycle parking and servicing.

- **Section 5 Trip Generation**

This Section sets out the forecast traffic impact for the proposals.

- **Section 6 Summary and Conclusion**

  This Section summarises the matters of the TS and ultimately concludes that planning permission should not withheld on transport grounds.

2. PLANNING POLICY

2.1 This section summarises the relevant National and Local transport policy in relation to the development site.

2.2 Relevant policy guidance related to the development is comprised of the following documents:

- National Planning Policy Framework (NPPF) – February 2025
- National Planning Practice Guidance (NPPG) – February 2024;
- The Mayors Transport Strategy – 2018;
- The London Plan – 2021;
- LBC Local Plan 2017; and
- LBC Planning Guidance – Transport - 2021.

National Planning Policy Framework (2025)

2.3 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced. Planning law requires that applications for planning permission be determined in accordance with local development plans and that the NPPF must be considered when preparing the development plan and is therefore a material consideration in planning decisions. The main objective of the NPPF is to achieve sustainable development.

2.4 The 2012 NPPF superseded PPG13 (Transport), which was formerly used as a basis for national transport policy. Whilst no longer policy, there are two key aspects within PPG13 which are still of relevance when determining a site's level of sustainable travel access, as stated below:

- *"Walking is the most important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly under two kilometres. Walking also forms an often forgotten part of all longer journeys by public transport and car."*
- *"Cycling also has potential to substitute for short car trips, particularly those under five kilometres, and to form part of a longer journey by public transport"*

2.5 It is considered that the walking and cycling distances referred to in PPG13 remain valid and should not be overlooked when determining the walking and cycling accessibility of development sites.

2.6 With regard to transport policy, the revised NPPF includes a chapter on 'Promoting sustainable transport' which includes the following text, relevant to this proposal:

Paragraph 110

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

Paragraph 113

"Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists. "

Paragraph 116

*"*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, following mitigation, would be severe, taking into account all reasonable future scenarios."*

Paragraph 117

"Within this context, applications for development 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."*

Paragraph 118

"All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored."

NPPG - February 2024

2.7 The NPPG provides advice for travel plans, transport assessments and statements in decision-*making*.

- *"Travel Plans, Transport Assessments and Statements are all ways of assessing and mitigating the negative transport impacts of development in order to promote sustainable development. They are required for all developments which generate significant amounts of movements."*

2.8 This report follows the advice within the guidance and accords with providing the information which should be included as part of a Transport Statement.

2.9 The site is located in an area with good public transport accessibility providing good opportunities for visitors and employees to use modes other than the car if and where possible.

2.10 Furthermore, it is anticipated that the proposed use will generate a net reduction in two way vehicle movements across the day and during the typical peak hours on the highway network and, as such, any impact on the surrounding highway network will be negligible. This is discussed in more detail in Section 5 of this report.

The Mayor's Transport Strategy

2.11 The Mayor of London published the Mayor's Transport Strategy in March 2018. This document sets out the Mayor's policies and proposals to reshape transport in London.

2.12 The strategy sets out a number of policies to help achieve the stated aims. Those relevant to this proposal are explored below.

- Policy 1 – This aims to reduce Londoners' dependency on cars in favour of active, efficient and sustainable modes of travel, with the target being 80% of all trips in London being made on foot, by cycle or using public transport by 2041.

- Policy 2 – This seeks to make London a city where people chose to walk and cycle more by improving street environments, with all Londoners doing at least 20 minutes of active travel each day by 2041.

- Policy 3 – This relates to Vision Zero, which aims for all deaths and serious injuries from road collisions to be eliminated from London's streets by 2041.

- Policy 7 – This seeks to make London's transport network zero emission by 2050 to contribute towards the creation of a zero carbon city.

- Policy 14 – This aims to enhance London's streets and public transport network to enable disabled and older people to face less issues when travelling.

- Policy 21 – The Mayor will ensure that new homes and jobs are delivered in line with the transport principles of 'good growth' which will enable the creation of high-density, mixed-use places and unlock growth potential in underdeveloped parts of the city.

2.13 As shown throughout this report the proposed development has been designed on reflection of the Mayor's Strategy, with a heavy focus placed towards encouraging sustainable travel within the locality through repurposing part of a large car park facility within a highly sustainable part of the city. Removal of no.176 car parking spaces from within the existing facility will naturally encourage modal shift.

The London Plan

2.14 The London Plan is the primary Mayoral policy addressing the key housing and employment issues in order to shape the way London develops. The London Plan was first adopted in 2011 but has since been the subject of a number of alterations, with the current London Plan adopted in March 2021.

2.15 The 2021 London Plan's key ambition is to ensure that 80% of all trips in London will be by foot, cycle, or public transport by 2041.

2.16 The relevant transport policies are noted below and are addressed throughout this report as necessary.

- T1 - *Strategic Approach to transport*

- T4 - *Assessing and mitigating transport impacts:*

- T5 – *Cycling*

- T6 – *Car Parking*

- T7 - *Deliveries, servicing and construction*

London Borough of Camden Planning Policy

2.17 LBC's planning policies are contained within their Development Plan, which incorporates their adopted Local Plan (2017). This Local Plan which spans the period of 2016 to 2031 and replaced the previous policy documents, including the Core Strategy and Camden Development Policies.

2.18 The relevant policies contained within the Local Plan are detailed in **Table 2.4**, all of which are then explored further in the noted section of this TA, as necessary.

2.19 It is also noted that LBC have started work on the review of the 2017 Camden Local Plan and are in the process of drafting a new Local Plan. At the time of writing this report, the responses from the consultation are under review and a published version of the local plan will be released for further consultation later this year. It is therefore considered that no weight should be put towards this emerging plan within this planning application submission. Notwithstanding, a review of the draft policies has been undertaken and it is considered that should these come forward for adoption, the summaries set out within this chapter and report remain valid, with an overall ambition to increase the use, reliance and provision of sustainable modes of travel.

2.20 In addition, Camden have a supplementary planning document (SPD) specific to transport, which is their January 2021 adopted 'Camden Planning Guidance – Transport'. This document has therefore also been reviewed and accounted for within the development design.

2.21 The key LBC policies considered throughout this TS are noted below

- A1 - Managing the impact of development

- T1 - Prioritising walking, cycling and public transport

- T2 - Parking and car-free development

- T3 - Transport infrastructure

- T4 - Sustainable movement of goods and materials

2.22 LBC's Local Plan policy T2 outlines that the council support the redevelopment of existing car parks for alternative uses. Therefore the policy directly supports applications of this nature, which seeks to reduce the capacity of the existing public car park facility to deliver B8 storage use within the Site.

Summary

2.23 It is considered that the Site and the Proposed Development accords with national, regional and local policy, as will be demonstrated throughout this report.

2.24 The Proposed Development accords with the NPPF policies being well located in an urban part of London, close to everyday needs of future employees and visitors. The Site has good connectivity to pedestrian and cycling opportunities as well as links to public transport making it well suited for the proposed development, in accordance with national policy.

2.25 Furthermore, the proposals have been designed and progressed on reflection of the pertinent regional and local planning policies, reflecting on both the aspirations of the Mayors Transport Strategy / London Plan, and the policies set out within LBC's adopted documents.

3. EXISTING SITUATION

Overview

3.1 This section reviews the context of the Site regarding the local transport network and accessibility to local facilities.

Existing Site

3.2 The Site comprises the former Intelli-Park car park facility located within the lower levels of New London House, which is a mixed-use building that, in addition to the car park, provides office and retail space, as well as an element of residential accommodation within the West Ends cultural and entertainment centre.

3.3 The immediate surrounding area is broadly residential in nature however there is an extensive range of land uses located in the vicinity of the Site, including and not limited to financial services, office uses, restaurants, convenience stores and bars.

3.4 The existing car park facility currently comprises a total of no.327 existing car parking spaces across five separate lower levels, and benefits from an existing Spokesafe cycle parking facility, which is to be retained on-site. The Spokesafe facility provides personal storage lockers, a bike repair station and pump, e-bike charging facilities and accommodates no.32 cycle parking spaces across a mix of a two-tiered rack system and several Sheffield stands, inclusive of spaces dedicated for larger cargo styled bikes and Ebikes.

3.5 Vehicular access into the Site is gained via a ramped facility from Parker Mews via a priority junction with Parker Street. Parker Street is a mixed used street located within the district of Holborn and on the periphery of Covent Garden, to the south of the borough. Lift and staired access cores for pedestrians are located along the Sites southeastern façade onto Parker Street.

3.6 Parker Street is a two-way street which runs between Dury Lane in the west to Newton Street in the east. Its carriageway is subject to a controlled 20mph zone and falls within a Controlled Parking Zone (CPZ) which restricts access to on the street parking bays that are available along its northern side, to resident permit holders only at all times (CPZ CA-C).

Figure 3.1 – CPZ Signage (Parker Street)

3.7 Loading bays are available to the northern side of the carriageway fronting the Site, which are subject to the restrictions illustrated within **Figure 3.2** as well as two car club bays, which limit access to Car Club permit holders only as shown within **Figure 3.3**. Double yellow lines are present to the southern edge of the carriageway within the immediate vicinity of the Site. Additionally, restrictions for single yellow lines operate Monday to Saturday from 8:30am to 6:30pm.

Figure 3.2 – Loading bay restrictions adjacent to Site (Parker Street)

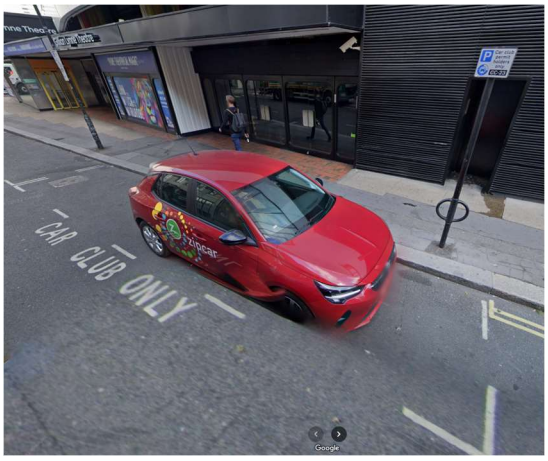


Figure 3.2 – Car Club Bay adjacent to Site (Parker Street)

3.8 Drury Lane forms the western boundary of the Site and facilitates one-way northeasterly vehicle movements between Aldwych, to its junction with the A40 circa 300m to the north of the Site. From the A40, connections can be made to/from the A4202 and A5 to the west, which both form part of TfL's network of Red Routes.

3.9 Within the vicinity of the Site, Drury Lane's carriageway narrows in places to reduce crossing distances across its carriageway for pedestrians. An on-footway, shared surface taxi drop off facility capable of accommodating set down of up to no.3 taxi's, is also provided within the highway, adjacent to the Sites western façade to the eastern edge of the carriageway, along with several 'pay by phone' on -street parking bays subject to the restrictions noted in Figure 3.3.

Figure 3.3 – 'Pay by phone' on street parking adjacent to Site (Drury Lane)

3.10 The site is located within the area covered by TfL's Congestion Charge. This is an area within Central London, which most vehicles have to pay a daily charge of £15.00 to enter. The Congestion Charge zone operates from 07:00 to 18:00 Monday to Friday and 12:00 to 18:00 on Saturday and Sundays. There is no charge between Christmas day and New Year's Day bank holiday (inclusive). The site is also located within the area covered by TfL's Ultra Low Emission Zone (ULEZ). Vehicles that do not

meet the emission standards are required to pay a charge of £12.50 (cars, motorcycles and Light Goods Vehicles under 3.5 tonnes) or £100 for heavier vehicles (Heavy Goods Vehicles over 3.5 tonnes and buses / coaches over 5 tonnes). The ULEZ operates 24 hours a day, seven days a week (except Christmas day). The ULEZ currently covers all areas within the North and South Circular Road. From August 2023, the ULEZ is proposed to expand to cover all London Boroughs.

Walking and Cycling

3.11 There is an excellent standard of pedestrian infrastructure provided throughout the local area. Wide, well-lit pedestrian footways continue from the Site's pedestrian entrance points on Parker Street in both directions. The network of high-quality footways continues throughout the local area, providing safe and convenient routes for staff commuting to the site, as well as those who may visit the Site on foot from the surrounding area.

3.12 The local area is well suited to cycling with a number of dedicated cycle routes located in close proximity to the site. There are sections of both on-street and off-street cycle lanes provided along the A40 to the north of the site and a marked cycle lane is provided along the entirety of Newton Street to the east (Quietway 1). There are advanced stop lines provided for cyclists at several nearby road junctions. The network of cycle routes locally can be seen within **Figure 3.4**, which are extracts taken from both TfL' s Cycleways Map and LBC's Cycle Network Map.

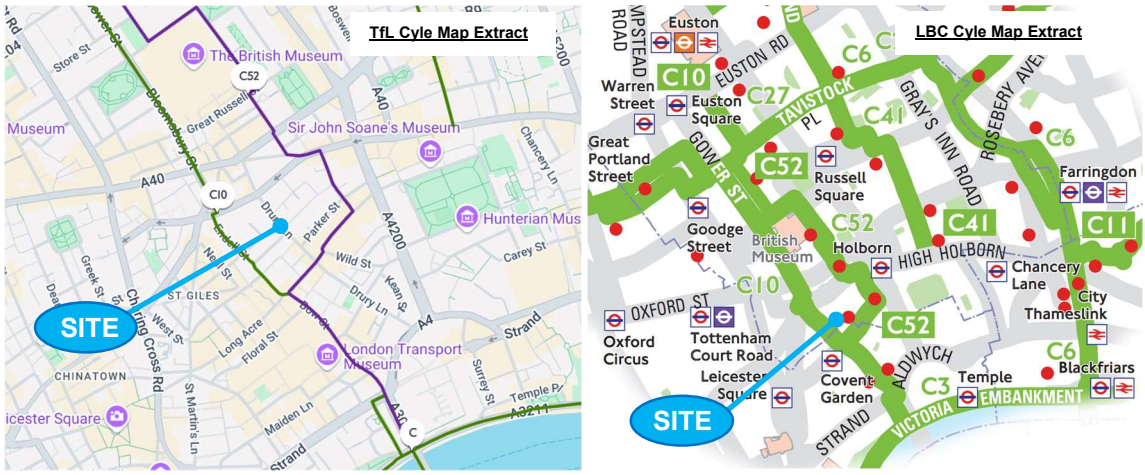


Figure 3.4 – Local Cycle Routes (TfL & LBC)

3.13 The A4200 Kingsway to the east is considered to be a 'cycle friendly' route and there are cycle parking facilities provided within sections of the road's central reservation. There are also secure cycle parking stands along Drury Lane adjacent to its junctions with Parker Street and Betterton Street, immediately adjacent to the Site. Further, a Santander Cycle hub is located on Dury Lane, immediately south of its junction with Parker Street.

Public Transport Accessibility

3.14 The site has a public transport accessibility level (PTAL) rating of 6b which is an 'excellent' rating as defined by Transport for London's (TfL) WebCAT tool. The PTAL methodology has been adopted by the GLA and TfL as a means of quantifying and comparing accessibility by public transport for a given site. The current methodology is based on a walk speed of 4.8kph and considers rail stations within a 12-minute walk (960m) of a site and bus stops within an eight-minute walk (640m) of a site.

3.15 This PTAL rating indicates the Site is well positioned within a desirable location for future development, as any future scheme would benefit from excellent access to/from frequent, high-capacity public transport, thus negating the need for this excessive existing provision of car parking.

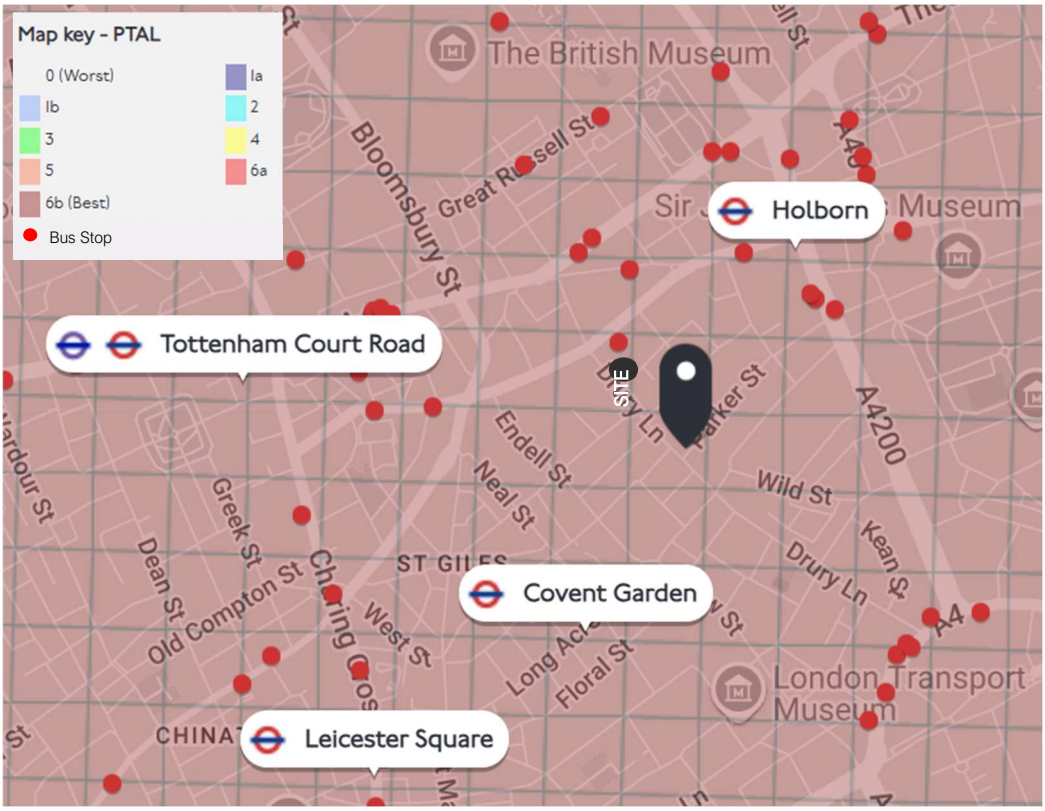


Figure 3.5 – PTAL Rating

3.16 As shown within the PTAL mapping at Figure 3.4, the Site is conveniently located centrally between both Holborn (Picadilly Line) and Covent Garden (Picadilly Line / Central Line) underground stations, both of which can be accessed within a 350m (5-minute) walk from the Site and provide frequent services throughout the day with wide area coverage. A wide range of bus services are also available, with the nearest bus stops accessible along the A40 to the north, and A4200 to the east.

3.17 Using TfL's Time Mapping (TIM) tool, it is clear that a large proportion of Greater London is accessible within approximately an hours journey from the Site when using public transport. The TIM mapping is demonstrated on **Figure 3.6**

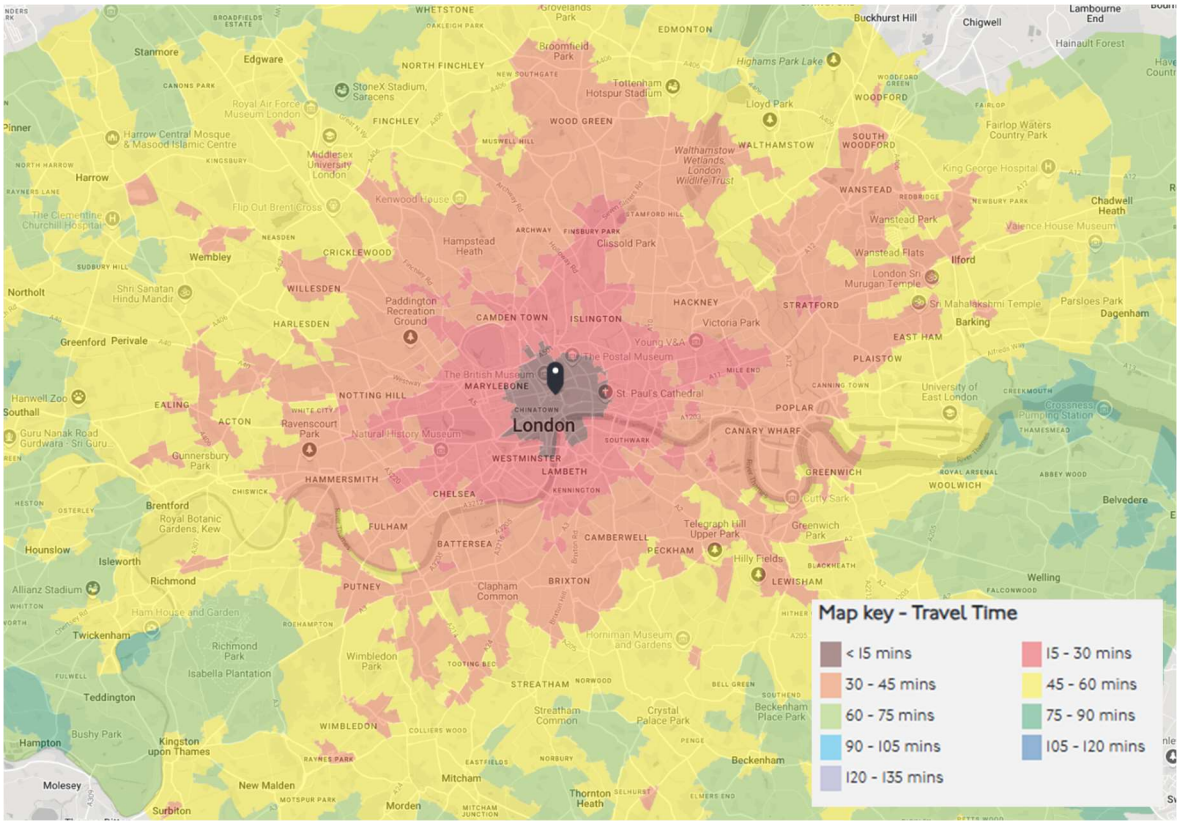


Figure 3.5 – TIM Mapping

3.18 The list of Central London and local town centre locations accessible from the Site based on TfL's TIM tool are demonstrated in **Table 3.2**.

Table 3.1 Central London and Local Town Centre Locations – TIM

Location	Travel Time
Soho, Clerkenwell, St Pancras, Blackfriars, Waterloo and Southbank	Less than 15 minutes
Elephant and Castle, Southwark, Kennington, Vauxhall, Victoria, Islington, Angel, Mayfair, Westminster, Knightsbridge, South Kensington, Belgravia, Earls Court, Holland Park, Paddington, St Johns Wood, Kentish Town, Finsbury Park, Shoreditch City of London, Marylebone, Camden Town, Mile End	15 – 30 minutes
Canary Wharf, Hackney, Wanstead, Wood Green, Hampstead Heath, Willesden, Notting Hill, Hammersmith, Fulham, Battersea, Putney, Clapham Common, Brixton, Peckham, Greenwich, Lewisham, Stratford,	30 – 45 minutes
Ealing, Greenford, Richmond, Wimbledon, Croydon, Northolt, Edgeware, Walthamstow, Chingford, Chadwell Heath, Dagenham	45 – 60 minutes

Summary

3.19 The foregoing demonstrates that the Site, as it exists, benefits from a robust level of connectivity to sustainable transport infrastructure in the locality, inclusive of regular underground and bus services which provide connectivity across Greater London and a widespread pedestrian and cycle network from which a diverse range of amenities are locally available to site users, and therefore the existing situation supports the presumption in favour of sustainable development as set out within the NPPF, para 11.

4. DEVELOPMENT PROPOSALS

Overview

4.1 This section sets out the details of the scheme being proposed, inclusive of access, layout, car and cycle parking, in addition to refuse and servicing for the proposals.

Development Description

4.2 The development proposals include the change of use of the basement carpark from Sui Generis to B8 (self-storage) for the future operation of a Here Self Storage facility. This will result in the removal of no.176 existing parking spaces from the Intelli-Park facility, which is to partly remain operational across floors -2 Level A and -3 Level A-B, to deliver no.822 drive up self-storage units across floors -4 Level B-C, -5 Level C-D and -6 Level D, equating to 2995.3m2 GFA of B8 use. The proposed site plans are provided at **Appendix A2.**

Access Arrangements

4.3 In terms of access to/from the proposed storage facility, it is proposed that vehicles will navigate through the Intelli-Park facility into the lower levels of the Site, where a signed and gated vehicular access into the storage facility will be located (at -4 Level B-C). Details regarding operational practices, including information around the gated access into the storage facility is provided in later paragraphs.

4.4 It is proposed to retain the vehicle circulation access aisles that connect the various levels throughout the Site, to enable easy access into the storage facility from the adjacent car park. Once through the controlled storage facility entrance, the retained circulatory access aisles allow vehicles and/or cycles/cargo bikes to navigate through the floors within the Site toward their respective storage unit and temporarily set down adjacent to the unit to load (whilst not blocking circulation of the facility for other vehicles). When loading activity is complete, those exiting the Site are to navigate back to the Site entrance and through the adjacent car park facility before rejoining the highway via the existing vehicular access onto Parker Mews.

4.5 The headroom restrictions (maximum 2.1m height clearance) upon entry to the Intelli-Park car park restrict vehicles to motorcycles, cars and vans. This restriction will be communicated to all customers of the storage facility through the marketing and sign-up processes, website and over the phone. Vehicles larger than a transit van will be denied access to the self-storage centre.

4.6 Customers who are arriving for the first time to check in to the self-storage facility will arrive by appointment only. The check in procedure will be undertaken within a dedicated reception area which

is at ground level and accessed via Parker Street. The operator typically has no.2 staff on-site at any one time to assist with check ins and storage solution services.

4.7 If the customer chooses to arrive by vehicle, staff will inform the customer of the arrivals process and also of the physical height restrictions that limit the type of vehicles that can access the site prior to arrival, prohibiting vehicles larger than this from visiting the site or unloading on the adjacent highway. 24-hour access will be granted to all customers following their initial check in via an entry system that utilises Bluetooth technology that is to be installed at both the vehicle and pedestrian entrances.

Vehicle Parking Provision

4.8 As the proposed site is intended to operate as a 'drive through' facility, with all vehicles arriving at the Site required to temporarily set down to load adjacent to their respective storage unit, before egressing the Site and rejoining the adjacent highway, no parking or designated set down bays are to be provided internal to the Site.

4.9 In terms of parking for staff, as detailed extensively throughout this TS, the Site is in a highly sustainable location, benefitting from easy access to two Central London underground stations and a range of bus stops which provide an extensive range of services throughout Greater London and beyond. These nearby facilities therefore provide excellent opportunities for future employees to travel to the Site without the need to use a private vehicle. In addition, the position of the Site ensures that a substantial range of services / amenities are available within a very short distance to cater for day-to-day needs of employees during lunch breaks and outside of working hours.

4.10 It is therefore considered that, in terms of provision of parking for all users, this Site is suitable to adopt a car-free parking strategy and therefore no car parking spaces are proposed for this development.

4.11 Should there be demand for accessible parking for future staff, accessible 'pay and display' parking is available within the retained section of the Intelli-Park car park facility which is present within the levels immediately above the storage facility. As outlined within Section 2, lift and staired access cores serve each floor, which can be used by any disabled employees that chose to use these 'pay and display' parking spaces. These access cores also accommodate access from street level for pedestrians via the Sites southeastern façade onto Parker Street.

4.12 This will then meet the requirements of Policy T2 within LBC's LP which support the redevelopment of existing car parks for alternative uses and requires all new developments in the borough to be car-free. It is considered that no impact on local on-street parking facilities is anticipated through the removal of this existing parking due to the vast range of sustainable alternative modes of transport available that provide access to the Site, as well as the presence of the CPZ in which the Site is

located, that restricts parking to resident permits, preventing the possibility of any overspill following the removal of these parking spaces.

4.13 In addition to the parking options available within the retained Intelli-Park facility, alternative 'pay by phone' parking is also available immediately adjacent to the Site on Drury Lane for short term parking activity.

Cycle Parking Provision

4.14 Further to the above, the proposals provide access to a range of storage units that vary in size and storage capacity, and therefore it is considered that those looking to access the smaller units could do so without the need to transport items via use of a private vehicle, arriving by bike or on foot as part of a multi modal round trip.

4.15 As previously outlined, for those visiting the Site via bikes and/or cargo bikes, to load at their designated storage unit, it is proposed that access is to be taken via the ramped access into the Site via Parker Mews, before routing through the site via the circulatory access aisles toward their designated storage unit.

4.16 Given the above, and the scheme's proposed land use as a self-storage facility, the likelihood of demand for cycle parking facilities is significantly reduced as trips associated with such a facility would most commonly be undertaken via car journeys. Nevertheless, staff trips associated with the development would be more likely to be undertaken via alternative modes to the private car and therefore the London Plan cycle parking standards for B8 use class has been reviewed to inform the proposed provision of cycle parking at the development.

4.17 The London Plan cycle parking standards are therefore set out in **Table 4.2**, these standards represent a minimum provision.

Table 4.1 London Plan 2021 Cycle Parking Standards – Minimum

Land Use / Use Class	Recommended Minimum Provision
B2-B8 general industrial, storage or distribution	1 long stay space per 500 sqm / 1 short stay space per 1000 sqm

4.18 Based on the above and the 1,975m2 of proposed GIA, the proposed development is required to provide a minimum of no.4 long stay spaces an no.2 short stay spaces (no.6. total spaces).

4.19 As outlined within Section 3, the existing Site benefits from a Spokesafe cycle parking facility which is to be retained. The facility provides personal storage lockers, a bike repair station and pump, e-

bike charging facilities and accommodates no.32 cycle parking spaces across a mix of a two-tiered rack system and several Sheffield stands, inclusive of spaces dedicated for larger cargo styled bikes.

4.20 The proposed Site is to be a secured site with security-controlled access, meaning that all provision will be both covered and secure, and provided across a mix of types of provision, in accordance with London Plan standards

4.21 It is therefore considered that the exiting cycle parking facilities which are to be retained, are sufficient to accommodate the proposals.

4.22 Short stay cycle parking facilities are also available within the highway within the immediate vicinity of the Site on Drury Lane, which is sufficient to accommodate temporary cycle parking needs, if required.

Refuse and Servicing

4.23 The self-storage site is anticipated to produce limited volumes of commercial waste. The majority of commercial waste associated with the self-storage industry takes the form of disused boxes and packing materials, which are typically collected on a weekly or fortnightly basis, depending on the scale of the operation on-site. Any commercial waste will be removed by the operators accordingly and transported to a recycling facility as appropriate.

4.24 As set out previously, the headroom restrictions (maximum 2.1m height clearance) upon entry to the car park restrict vehicles to motorcycles, cars and vans. This restriction will be communicated through the marketing process, website and over the phone. Vehicles larger than a transit van will be denied access to the self-storage centre.

5. TRIP GENERATION

Overview

5.1 This section considers the potential vehicle trip generation and parking demand likely to be associated with the proposed development.

Trip Assessment Methodology

5.2 In order to be robust, this assessment considers that current usage of the car park and network remains the same, despite the fact that the overall number of spaces to be provided within the car park is reducing. It should be noted that this car park could operate at full capacity at any point and therefore the conclusions of this assessment should be viewed as a very worst case. Importantly the network and car parking technically could accommodate full operation at full capacity under the current permission.

Existing Development Trips

5.3 Data has been collected via the Automatic Number Plate Reader (ANPR) system that is installed at the Site entrance to understand the current vehicular activity at the existing car park. Data has been extracted covering the 7-day period between 20/03/25 and 26/03/2025, which is considered representative of a typical and recent week. The data is summarised within **Table 5.1** and can also be found appended at **Appendix A3**.

Table 5.1 Existing Car Park Data (Arrivals)

Day	20/03/ 2025 (Thursday)	21/03/ 2025 (Friday)	22/03/ 2025 (Saturday)	23/03/ 2025 (Sunday)	24/03/ 2025 (Monday)	25/03/ 2025 (Tuesday)	25/03/ 2025 (Wednesday)
Arrivals	103	125	157	45	99	93	102

5.4 The data shown within Table 5.1 identifies that Saturday is the busiest day of the week in terms of arrivals at the Site, with the least arrivals occurring on a Sunday. When averaged over a 5-day period (Mon-Fri), the Site typically generates circa no.104 arrivals each day. Arrivals remain broadly consistent Monday through to Thursday, with an increase noted on Friday and Saturday and a considerable decrease noted on Sundays.

Proposed Development Trips

Staff

5.5 The applicant has confirmed that two employees would be required to be on-site at any one time. No specific on-site car parking would be provided for staff except as given the site's location (PTAL 6b) it is anticipated that employees would use public transport and / or active travel modes for their travel to / from work.

General

5.6 In order to ascertain the proposed development trips, the TRICS (version 7.11.3) database has been interrogated, with the following parameters selected:

- Selected category: 02 'Employment';
- Selected subcategory: E 'Warehousing (Self-Storage);
- Selected regions: England (Greater London);

5.7 The above search resulted in no surveyed sites being available for inclusion within the site selection, which meant that a subsequent trip rate could not be determined. A further assessment was undertaken, which considered additional regions outside of Greater London, however the surveyed sites available were not considered comparable in terms of location, with many of the sites being in more suburban areas and therefore not representative of the sustainable location of the Site.

5.8 A review of consented applications in the borough has been undertaken, to assess how trip generation assessments for similar use classes (B8 self-storage) have been considered, however no comparable applications that have obtained planning consent from LBC within the previous 3-year period could be located.

5.9 The abovementioned search of the planning portal was extended into neighbouring boroughs, throughout areas which also share the characteristics of a Central London location with an excellent level of accessibility to public transport (PTAL 6b). An application that was approved by Westminster City Council (WCC) in July 2017 for the change of use of part of the existing NCP Edgware Road basement car park at Water Gardens on the Hype Park Estate in Paddington to be used as storage space (Use Class B8) was identified (planning ref: 17/03780/FULL).

5.10 The trip generation assessment presented within the TS submitted to WCC in support of the consented scheme presented survey data collected from operational Safestore self-storage facilities

in Paddington and Notting Hill which was assessed to understand how many trips the proposed storage facility would likely generate.

5.11 The Paddington facility is located in the City of Westminster, has 2,306m2 (GIA) of floor space, 389 storage units and two parking spaces. The Notting Hill facility is located in the Royal Borough of Kensington and Chelsea (RBK&C), has 4,491m2 (GIA) of floor space, 536 storage units and four parking spaces.

5.12 These operational sites included within the above-mentioned TS are considered comparable to the proposed development, being based in Central London locations which are well connected to existing public transport infrastructure, as well as comparable in size, with low parking ratios. Whilst it is appreciated that the survey data used to inform this trip generation assessment was recorded in 2017, it is considered that travel behaviours associated with uses of this nature (B8 self-storage) has not differed and is still representative of a facility that is operational during the present day.

5.13 It is therefore proposed to utilise the survey data and subsequent vehicular trip rates detailed within the abovementioned consented application, within this trip generation assessment to determine the likely level of trip generation generated by the proposed development.

5.14 **Table 5.2** summarises the results of the surveys at the Paddington and Notting Hill stores. Extracts taken from the NCP Edgware Road basement car park TS, which provides the full results of the surveys, are provided at **Appendix A4**.

Table 5.2 Safestore Paddington and Notting Hill Stores Existing Trip Generation Data

	Paddington (2,306 sqm)		Notting Hill (4,491 sqm)	
	Weekday	Weekend	Weekday	Weekend
Average Daily Vehicle Arrivals	14	11	16	13
Daily Trip rate	0.598	0.455	0.347	0.289

5.15 In order to estimate how many vehicle trips the proposed facility would generate, the trip rates associated with the Paddington and Notting Hill sites, which are considered comparable to the proposed development, have been applied to the floor area of the proposed site (1,975m^2).

Table 5.3 Proposed Site Trip Generation Data (based on trip rates for the consented Safestore Paddington and Notting Hill Stores)

	Paddington		Notting Hill	
	Weekday	Weekend	Weekday	Weekend
Average Daily Vehicle Arrivals (Based on 1,975m2 GIA)	12	9	7	9

5.16 Table 5.2 demonstrates that should the daily amount of movements be further broken down across the day, the number of vehicle trips that could be generated by the proposed storage facility per hour would be low and consequently the proposal would not have a material impact on the operation of the public highway network, especially when compared to the existing use of the site as a public car park.

5.17 As a worst-case assessment, it is noted that the number of spaces within the operational car park will reduce from no.327 to no.151—a reduction of no.176 spaces. If it is assumed that this reduction does not impact the overall level of daily trip generation, and the average weekday number of trips remains at no.104 trips per day, then the addition of no.12 daily trips associated with the proposed storage facility would result in a combined total of no.116 daily trips. This level of activity would still fall within the typical daily fluctuations observed at the existing site (see Table and, notably, remains lower than the number of trips recorded on its busiest days of operation (such as Fridays or Saturdays).

6. SUMMARY AND CONCLUSION

Summary

6.1 This TS has been prepared by Iceni Projects on behalf of CP CO 13 Limited to support a change of use application from Sui Generis to Use Class B8 (Storage and Distribution) at the former Intelli-Park London Covent Garden car park facility, at Parker Mews, WC2B 5NT.

6.2 It is considered that this proposed part conversion of the existing car park to deliver B8 storage use within the Site is in line with the changing needs of the area and not only meets the demand for storage space but also contributes to a more sustainable and functional urban environment.

6.3 The site benefits from an excellent level of accessibility to nearby transport networks, which is reflected in the sites PTAL scoring of 6b. Furthermore, the Site benefits from being within close proximity of a Car Club bay and Santander cycle hub, meaning that the Site can be easily accessed by future staff and visitors via various sustainable alternatives over use of a private car.

6.4 The existing car park facility currently comprises a total of no.327 existing car parking spaces across five separate lower levels. A total of no.176 car parking spaces are to be removed from the Site to provide no.822 self-storage units. This will reduce the existing Intelli-Park facility down to a total of no.151 car parking spaces.

6.5 Considering the ‘drive through’ nature of the proposals and the Sites highly sustainable location, no specific car parking is to be provided for customers or staff. Any staff parking activity associated with the development, if any, can be accommodated via the ‘pay and display’ spaces available within the adjacent Intelli-Park facility.

6.6 The existing access arrangements and circulatory lanes within the Site are to be retained. Access to the Site when checking in to a storage unit for the first time will be via appointment only, which will help the operator manage circulation of traffic flow throughout the Site. 24-hour access will then be granted via the mechanism of a Bluetooth operated security system.

6.7 Marked parking bays are not demarcated on the proposed layout as vehicles will access the site on an ad-hoc basis and will park adjacent to the self-storage units to undertake loading/unloading.

6.8 The site benefits from an existing Spokesafe cycle parking facility, which is to be retained on-site. The Spokesafe facility provides a total of no.32 cycle parking spaces across a mix of a two-tiered rack system, and several Sheffield stands. This is inclusive of spaces dedicated for larger cargo styled bikes and Ebikes, as well as personal storage lockers, a bike repair station and pump, e-bike

charging facilities. It is therefore considered that the facility to be retained is sufficient, in its current form, to accommodate the needs of the proposed development.

6.9 The site is anticipated to produce little in terms of waste. Any commercial waste will be removed by the operators accordingly and transported to a recycling facility as appropriate.

6.10 The trip generation assessment presented in this Transport Statement is informed by survey data collected from the existing Site, and from two sites located in Central London that are comparable to the proposed use. The analysis assumes that, in the proposed scenario, the average daily trip generation of no.104 trips associated with the current car park would remain consistent, even with a reduction in capacity from no.327 to no.151 spaces. Under this assumption, the addition of no.12 daily trips generated by the proposed storage use would result in a total of no.116 trips per day—still within the normal range of daily fluctuations observed at the site and lower than levels recorded on the busiest days.

Conclusion

6.11 On the above basis, this TS has considered all relevant National and Local guidance and demonstrates how the development will result in a significant net reduction in traffic on the local road network, whilst also bringing the site back into productive use. Therefore, there are no transport-related reasons as to why planning permission should be withheld for the development.

A1. SITE LOCATION

EXISTING LEVEL C-D BLOCK PLAN

SCALE BAR @ 1:500

0 10 20 30

METRES

LOCATION PLAN

SCALE BAR @ 1:1250

20 40 60

METRES

Revisions	Date	Drawn	Chk'd

Client

FACTOR 9 DESIGN

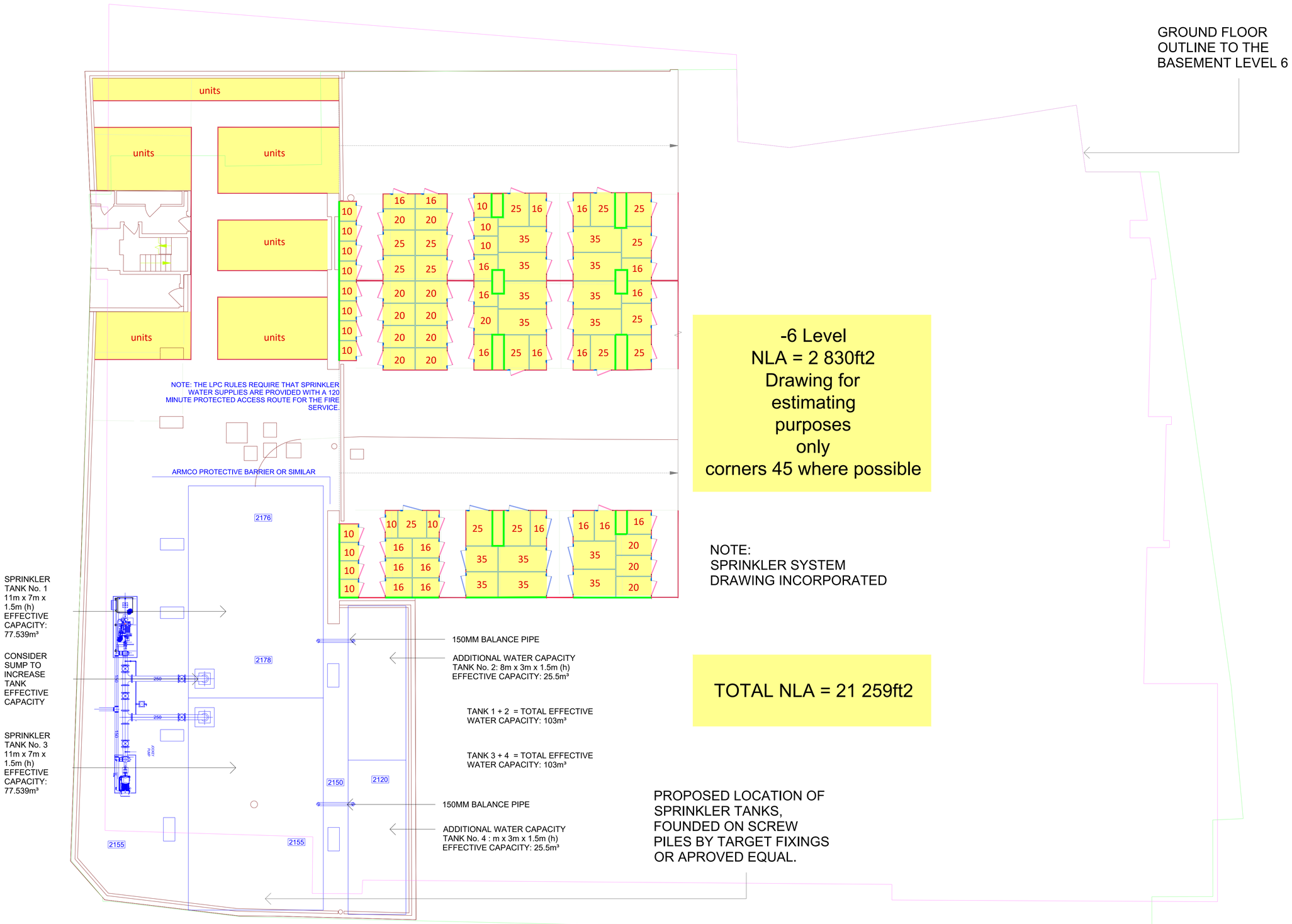
Unit 536 Linen Hall
162-168 Regent Street
London
W1B 5TD
Phone 02078215650
Email :
email@factor9design.co.uk

Project

NCP Covent Garden
Parker Mews
London WC2B 5NT

Drawing Title	Status
EXISTING CARPARK LEVEL C-D BLOCK PLAN & LOCATION PLAN	Planning
	Scale - unless otherwise stated 1:500 at A3
	Drawing Number **24.162 /01** Rev

A2. PROPOSED SITE PLANS



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Legend is not to scale

Corner Protectors: 90° 45°
Mesh: special areas m² | all boxes m²
Soffits
Mezzanine Columns: C-1 C-2 C-upper | C-1 C-2 C-upper
Doors with nokē: Wired Example
Doors with Mini-Mullions
Single Swing & Double Swing Doors: Single - 75cm | Single -1m | Double swing 1.5m | Double swing 2m
Manhattans Doors: 1m x 3 | 0.75m x 3 | 1m x 2 | 0.75m x 2
Roller Shutter Doors: Blue is always = 2m | see description
Partitions | Walls: Corridor - White | Corridor - White - Flat | Internal - Zinc | Liner - Zinc
Wall Plate on White Wall | Wall Plate on Stud Wall

All unit sizes are rounded up/down to the closest whole number in m² or every 5ft² in ft² terms. The dimensions on the "Construction Drawing" are measured from the centre of one wall to the centre of another.

General Notes 1. Do not scale drawings, read figured dimensions only | 2. Drawing to be read in conjunction with specification sheets & engineers details
3. If drawing contains information from others, Janus Europe cannot accept responsibility for the accuracy of such information
4. All works to be in accordance with British building regulations and other relevant codes | 5. Refer any discrepancies to Janus Europe prior to the continuation of the project.

ISO 9001:2015

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Customer approval: *I understand this drawing and accept responsibility for any further changes*
Signed: Date:
Date: 8-May-25 Drawn: ZP
Job Number: C036422-No-E Sheet: 00 Rev: E
Scale: 1:100 @ A1
Issue Status: PROPOSAL DRAWING
Drawing Title: Level D - C
Client Name: Here Self Storage
Site Address: Covent Garden

JANUS INTERNATIONAL EUROPE

Stair Core Included in GIA
22.8 sq m
245 sq ft

Stair Core Included in GIA
16.1 sq m
173 sq ft

BOH Included in GIA
91.3 sq m
983 sq ft

Void Included in GIA
6.5 sq m
70 sq ft

-5 Level
NLA = 9 300ft2
Drawing for
estimating
purposes
only
corners 45 where possibl

LEVEL C
CAR PARK

LEVEL D

LEVEL D
CAR PARK

LIFT MOTOR ROOM

Last saved by: Zofia.Polak

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Legend is not to scale

Corner Protectors	Mesh	Soffits	Mezzanine Columns	Doors with nokē	Doors with Mini-Mullions	Single Swing & Double Swing Doors	Manhattans Doors	Roller Shutter Doors	Partitions | Walls
90° 45°	special areas m² / all boxes m²		C-1 C-2 C-upper / C-1 C-2 C-upper	Wired Example	dm/2 dm	d75 Single - 75cm; Single -1m; d1.5m Double swing 1.5m; Double swing 2m	1m x 3; 0.75m x 3; 1m x 2; 0.75m x 2	Blue is always = 2m; see description	Corridor - White; Corridor - White - Flat; Internal - Zinc; Liner - Zinc

All unit sizes are rounded up/down to the closest whole number in m² or every 5ft² in ft² terms. The dimensions on the "Construction Drawing" are measured from the centre of one wall to the centre of another.

Wall Plate on White Wall | Wall Plate on Stud Wall

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Scale: 1:100 @ A1

Job Number: C036422-No-E Sheet: 01 Rev: E

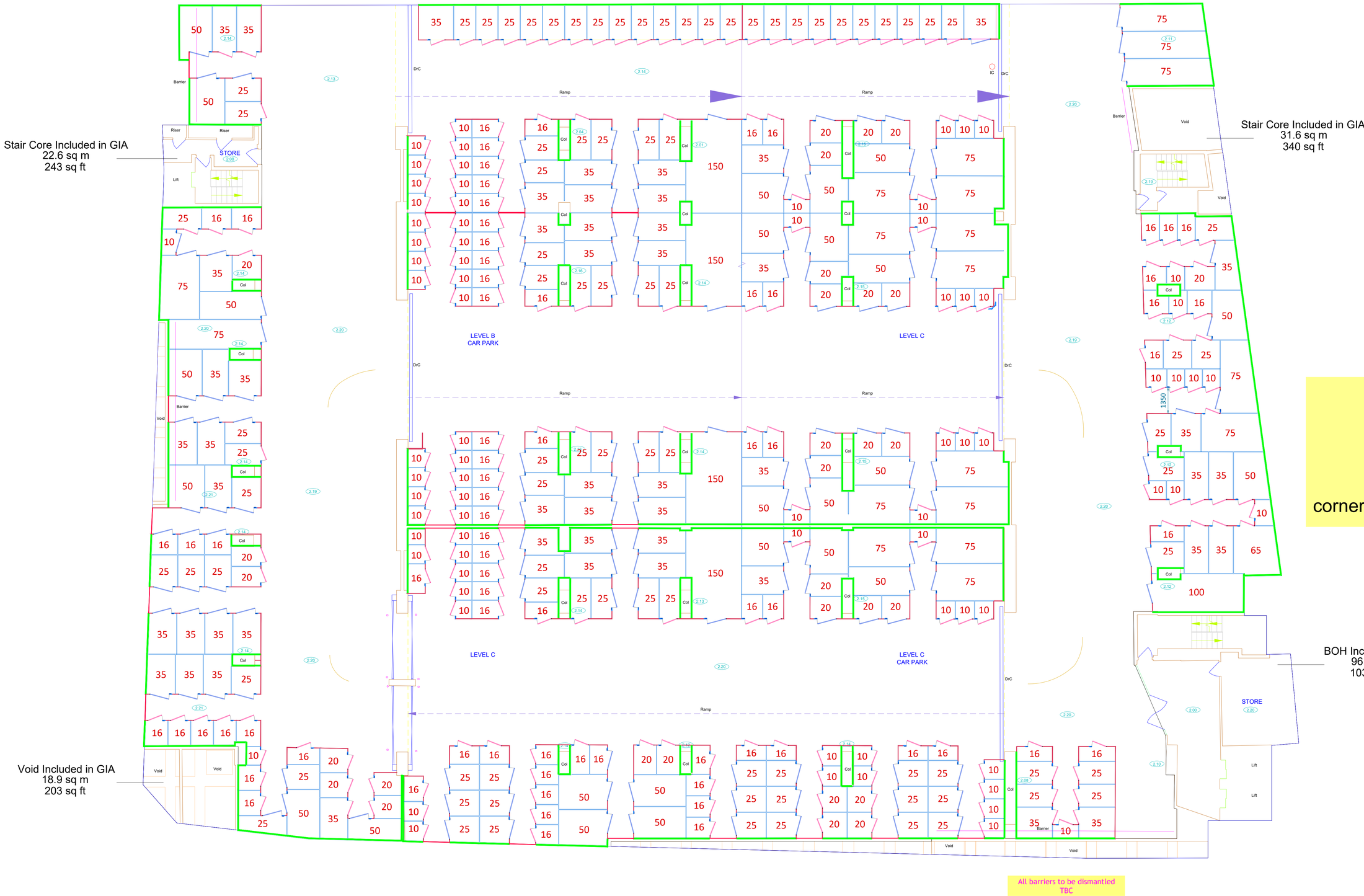
Issue Status: PROPOSAL DRAWING

Drawing Title: Level D - C

Client Name: Here Self Storage

Site Address: Covent Garden

JANUS INTERNATIONAL EUROPE



-4 Level B-C
Drawing for
estimating
purposes
only
corners 45 where possib

Unit Mix Table		
Level -4 : B-C		
Size	No	Total
10	76	760
16	74	1184
20	30	600
25	87	2175
35	50	1750
20	25	500
35	1	35
75	19	1425
100	1	100
150	4	600
TOTALS	367	9129
GROSS FLOOR AREA		12999
AVERAGE UNIT SIZE		24.87
YIELD		70%

Legend is not to scale

Corner Protectors: 90° 45°
Mesh: special areas m² | all boxes m²
Soffits
Mezzanine Columns: C-1 C-2 C-upper | C-1 C-2 C-upper
Doors with nokē: Wired Example
Doors with Mini-Mullions: d=75 d=m
Single Swing & Double Swing Doors: d75 Single - 75cm | Single -1m | d=1.5m Double swing 1.5m | Double swing 2m
Manhattans Doors: 1m x 3 | 0.75m x 3 | 1m x 2 | 0.75m x 2
Roller Shutter Doors: Blue is always = 2m | see description
Partitions | Walls: Corridor - White | Corridor - White - Flat | Internal - Zinc | Liner - Zinc
Wall Plate on White Wall | Wall Plate on Stud Wall

All unit sizes are rounded up/down to the closest whole number in m² or every 5ft² in ft² terms. The dimensions on the "Construction Drawing" are measured from the centre of one wall to the centre of another.

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Signed: Date:
Date: 8-May-25 Drawn: ZP
Scale: 1:100 @ A1
Job Number: C036422-No-E Sheet: 02 Rev: E
Issue Status: PROPOSAL DRAWING

Drawing Title: Level C - B
Client Name: Here Self Storage
Site Address: Covent Garden

JANUS INTERNATIONAL EUROPE

A3. EXISTING CAR PARK DATA

Filter Reset filter

01-10-2024 ~ 27-03-2025

Location

Covent Garden

Company

Greenpoint c/o Global Mutual

Region

Default Region

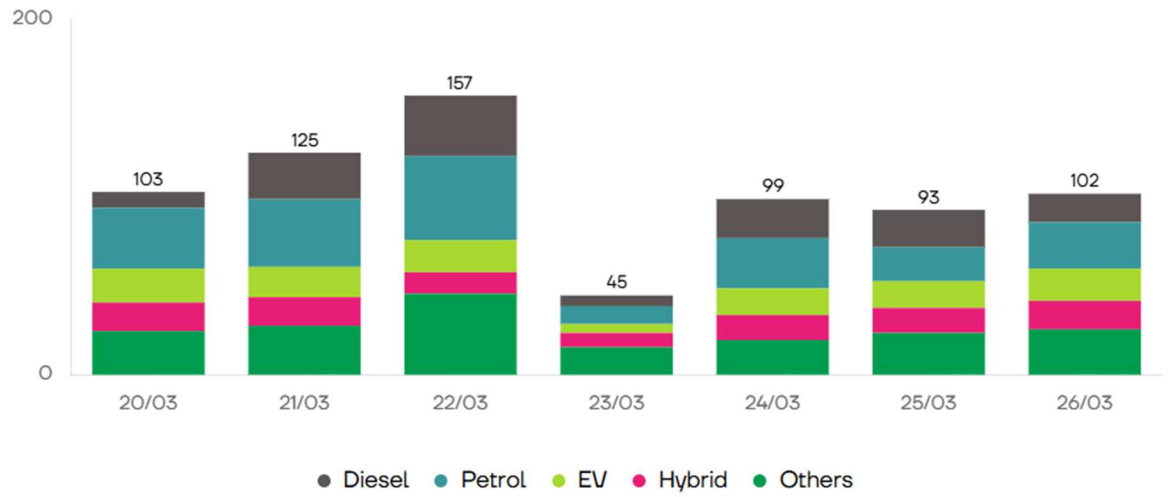
Zone

Select more

Daily visits

Number of visits per day (ANPR).

View insight



Summary

Total visits	Avg. per day
724	103
(EV) 107	(EV) 15

Date with most visits	22/03/2025
Number of visits	157

Date with fewest visits	23/03/2025
Number of visits	45

View insight

A4. DATA FOR TRIP GENERATION (PLANNING REF: 17/03780/FULL – WESTMINSTER CITY COUNCIL)

		Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	TOTAL	AVERAGE
Paddington	Total hours	9h 9m	1h 36m	5h 39m	2h 36m	7h 4m	7h 48m	1h 44m	35h 36m	5h 5m
	Average dwell time	0h 32m	0h 9m	0h 24m	0h 12m	0h 28m	0h 31m	0h 17m		0h 22m
	Total number of movements	17	10	14	13	15	15	6	90	13
	Average movements per trading hour	1.5	1	1.4	1.1	1.4	1.4	0.8		1.24
		Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	TOTAL	AVERAGE
Notting Hill	Total hours	13h 20m	13h 13m	10h 8m	9h 57m	22h 10m	8h 0m	2h 9m	78h 57m	11h 16m
	Average dwell time	0h 44m	0h 44m	1h 7m	0h 35m	1h 23m	0h 26m	0h 16m		0h 45m
	Total number of movements	18	18	9	17	16	18	8	104	15
	Average movements per trading hour	1.7	1.8	0.9	1.7	1.5	1.8	1.2		1.5

SUNDAY 29/01/17

Camera Location: Paddington				
VEHICLE TYPE	ARRIVAL TIME	DEPART TIME	DURATION OF STAY (Hrs:Mins)	ACTIVITY INFORMATION
Car	10:33	11:28	0h 55m	customer
Transit	11:49	11:52	0h 3m	customer
Car	12:29	12:50	0h 21m	customer
Car	12:45	12:49	0h 4m	customer
Car	15:36	15:47	0h 11m	customer
Transit	20:47	20:57	0h 10m	customer
Total			1h 44m	
Total Number of Movements:			6	
Average Dwell Time:			0h 17m	
No. Movements per Trading Hour:				
10:00-11:00			1	
11:00-12:00			1	
12:00-13:00			2	
13:00-14:00			0	
14:00-15:00			0	
15:00-16:00			1	
Average:			0.8	

Camera Location: Notting Hill				
VEHICLE TYPE	ARRIVAL TIME	DEPART TIME	DURATION OF STAY (Hrs:Mins)	ACTIVITY INFORMATION
7.5t Panel	09:50	10:40	0h 50m	customer
Car	11:39	11:48	0h 9m	customer
Car	12:20	13:02	0h 42m	customer
Car	13:44	13:52	0h 8m	customer
Car	13:56	14:00	0h 4m	customer
Car	15:23	15:30	0h 7m	customer
Car	15:24	15:31	0h 7m	customer
Car	15:40	15:42	0h 2m	customer
Total			2h 9m	
Total Number of Movements:			8	
Average Dwell Time:			0h 16m	
No. Movements per Trading Hour:				
10:00-11:00			0	
11:00-12:00			1	
12:00-13:00			1	
13:00-14:00			2	
14:00-15:00			0	
15:00-16:00			3	
Average:			1.2	