

**ADVICE from Primrose Hill Conservation Area Advisory Committee**  
12A Manley Street, London NW1 8LT

16 October 2013

**Utopia Village, 7 Chalcot Road, NW1 8LH 2013/6589/P**

1.0 The Advisory Committee reviewed the revised scheme at its meeting on 16 October 2013. We do not repeat general comments made in our advice on 21 August 2103 on the previous application, 2013/5111/P, although our dismay over the destructive nature of this proposal on the local community is undiminished. We also note that we have not been offered any pre-application discussion by the applicant.

2.0 We strongly urge the Council to agree that prior approval will be required, essentially on the grounds of the transport and highways impact of the proposals. We also strongly advise that prior consent should be refused on transport grounds.

3.0 We are convinced that the transport issues are of sufficient weight to justify the rejection of the scheme. This is based on vehicle movements into and out of the site.

3.1 The transport study by Robert West on behalf of the applicant does not provide a sound assessment of the effect of the change of use on transport. Its conclusion that 'there are no traffic and transport reasons to prevent a C3 residential re-use' (para 8.7 p. 11) is insufficiently substantiated to be rational.

3.2 For example, it assumes that all 'trips' are equal: that is, pedestrian access and car access are treated equally as 'trips'. The key tables aggregate trips, even though each mode, particularly vehicle or foot, is profoundly different in terms of safety, environmental impact, and energy use. This is unrealistic, absurd, and dangerous.

3.3 So, the total number of trips, by all modes, is compared in Table 5.2 (p. 10) and suggests that the proposed development would reduce the total number of trips from 128 to 78 or 142 to 58. But this fails to identify movements by car or other motor vehicle. We note that in the existing use the number of car trips given in Table 4.3 (p. 8) is identified as only 4 and 7. That is, of the 128 morning trips only 4 are by car, of the 142 evening trips only 7 are by car. There is no assessment in these tables of car trips alone in the case of residential use of the site.

3.4 It is not believable that with 53 dwellings the number of car trips will not increase very considerably on the total of 11 car trips identified in the current use.

3.5 While we note that the number of on-site car-parking spaces is reduced from 20 to 11, we would expect car trips not to be limited only to resident's driving in to park.

3.6 In this context it appears from the application that there will be 11 on-site spaces, but provision for 20 car-parking spaces under a legal agreement with Camden. Where will these further spaces be? Will they use the parking provision on surrounding streets, already under serious stress? And why should those residents parking off-site not drive into the site to deliver or collect, adding to the trips accessing the site?

3.7 What estimate would be reasonable for trips by taxi? In a high-cost development, with limited car-parking, taxi use might be expected to be high.

3.8 No measurement has been made of delivery vehicles, although many local residents have deliveries by Ocado and other shopping delivery companies. These

deliveries are made to each front door. Why will Utopia Village residents not use such services?

3.9 We also note again, that Chalcot Road is a predominantly residential street, and an important pedestrian route, including a safe route to our local school.

3.10 Robert West's statement (para 5.9 at p. 10) that they have 'felt it unnecessary to undertake a detailed direct comparison between the "proposed" and "existing" generation of the site' is informative of their approach. Their claim that this is because the 'proposed 53 unit residential scheme has a much smaller footprint than the same floorspace as B(1)a office space' is hard to understand as the building envelope is not to be changed.

4.0 We advise that the transport issues are so harmful, and potentially dangerous, that the Council should agree that prior approval would be required in this case, and that prior approval should be refused.

A handwritten signature in black ink, appearing to read 'Richard Simpson', with a long horizontal flourish extending to the right.

Richard Simpson FSA  
Chair