

9 Arkwright Road, NW3
Change of Use B1 Office to C3 Residential

Transport Statement

for

Mr & Mrs J San

January 2013

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1.0 Introduction

- 1.1** Motion has been instructed on behalf of the applicants at 9 Arkwright Road to provide transport planning advice relevant to the current application (reference 2012/3115/P) for the creation of a large family home. The application was submitted to the Council in June 2012 and comprises the remodelling, refurbishment and extension of a 19th Century former residential building with 20th Century additions most recently in use as offices.
- 1.2** The existing building occupies a large plot on the south side of Arkwright Road, a predominantly residential street running between Finchley Road in West Hampstead and Rosslyn Hill in Hampstead. Over several floors the former offices provided 1,534 square metres of floor space. An existing vehicle crossover on Arkwright Road provides access via a driveway along the eastern boundary of the plot and serving a hard-surfaced parking area offering approximately 8 parking opportunities.
- 1.3** The proposed works to the building and conversion to residential use will provide a substantial family home offering 7 bedrooms, living and entertainment space, accommodation for a nanny and two bedrooms for domestic staff. Improvements to the building include making the property accessible to wheelchair users with a platform lift proposed to overcome level differences to access the front of the property and with an internal passenger lift serving each of the basement, garden, ground, first and second floors.
- 1.4** The remodelling to the rear of the property includes the partial removal of the open hardstanding offering car parking to the former office use but the crossover and driveway is proposed for retention and will provide ramped access to up to 4 “underground” parking spaces at the basement level. It is the proposed retention of car parking spaces at this property which triggers the need for a Transport Statement to accompany the planning application, in accordance with the requirements of Camden’s Core Strategy.

2.0 Policy Considerations

LB Camden Development Policies

Policy DP18

- 2.1** The Council's main objective is to limit the supply of car parking in order to address congestion in the borough. Policy DP18 states that the Council "will seek to ensure that developments provide the minimum necessary car parking provision". Car-free development is expected in certain town centres and areas of high accessibility that are also within controlled parking zones.
- 2.2** The property at 9 Arkwright Road is within the controlled parking zone "CA-H" where permits are required Monday to Saturday between 9.00am and 8.00pm. It also benefits from excellent accessibility due to its proximity to bus route corridors and Finchley Road and Hampstead stations.
- 2.3** Policy DP18 also refers to the Council's car parking standards in Appendix 2 and to the requirements of Policy DP19.
- 2.4** The Development Policies go on to note that "*the Council generally expect development in low parking provision areas to be car-free*" (our emphasis). It is considered relevant that the Core Strategy does not explicitly state that it "requires" development in low parking provision areas to be car-free and, further, it notes that the inclusion of general car parking will be "*resisted*" unless supported by a Transport Assessment or other compelling justification.
- 2.5** The Development Policies continues that the objectives of car-free development include:
- 1) Freeing space on a site to allow additional housing, cycle parking, amenity space, etc;
 - 2) To enable additional development where parking provision would not be acceptable due to congestion and on-street parking stress; and
 - 3) To help to promote alternative more sustainable forms of transport.
- 2.6** The proposals at 9 Arkwright Road are predominantly for a change of use to an existing building. As such the proposed scheme does not prejudice objectives 1 and 2 listed above.
- 2.7** With regard to the promotion of sustainable means of transport, the retention of on-site car parking does facilitate car ownership but this in itself should not be considered to be contrary to policy; it is the type of vehicle and how it is used that can be unsustainable. The proposed development is able to contribute positively to the

promotion of alternative sustainable means of transport with the installation of infrastructure to support electric vehicle use.

Policy DP19

2.8 Policy DP19 deals with managing the impact of parking, commenting that it can affect the environment through loss of landscape features and increased surface run-off through additional hard surfacing.

2.9 It is evident from the existing and proposed drawings submitted with the planning application that there is little or no change in the area of hard landscaping associated with the driveway and parking area and hence no negative impacts arise as a result of the proposals.

2.10 Policy DP19 also encourages the removal of surplus parking spaces. The number of parking spaces at the property will be reduced from the existing level, in accordance with this objective.

2.11 Policy DP19 goes on to note that development will be resisted which:

- ▶ *Harms highway safety or hinders pedestrian movement*
 - Motion response: The vehicle crossover exists already. It measures 3.0m in width which is suitable to serve a single dwelling although the application proposes a slight widening. The number of spaces the crossover serves will be reduced, expected to lead to a reduction in vehicle movements, particularly during peak periods when passing pedestrian movements may be higher. Hence the proposals are not considered to cause harm to highway safety or hinder pedestrian movement;
- ▶ *Provide inadequate sightlines for vehicles leaving the site*
 - Motion response: The existing footway width in the vicinity of the existing crossover measures 2.4 metres and consequently suitable visibility splays are achievable in both directions for drivers leaving the site, the usual setback for measurement being 2.4 metres behind the edge of the carriageway. The nearside kerb is visible in both directions at 43 metres in both directions, appropriate for a 30 mph speed limit. Hence the proposals do not provide inadequate sightlines;
- ▶ *Add to on-street parking demand*
 - Motion response: The proposals to retain car parking on-site, including a wheelchair accessible space, will remove the need for vehicles to park on-street. The applicant is prepared to accept a planning

obligation that no permits to park within the controlled parking zone will be issued for this property address, offering further assurance to the Council that this development will not add to on-street parking demand;

- ▶ *Require detrimental amendments to existing controlled parking zones*
 - Motion response: No changes to existing on-street parking controls are required, the vehicle crossover serving the retained parking spaces already exists and is fit for purpose;
- ▶ *Create shortfall of parking provision in terms of cycle parking, disabled parking, service vehicles, taxis, etc*
 - Motion response: The proposed modifications to the building will offer improved access from an on-site disabled car parking space and offer on-site cycle storage. The development is not of a scale or nature to require dedicated on-site provision for servicing and taxi pick-up / drop-off and these activities will be able to take place from the street. As such there is no shortfall of provision;
- ▶ *Create a shortfall of public parking*
 - Motion response: The property neither requires nor provides public car parking.
- ▶ *Create or add to an area of parking that has a harmful visual impact*
 - Motion response: It is apparent from the drawings showing the proposed garden floor plan that the appearance of the driveway and hard standing offers an enhancement to the visual appearance at the rear of the building. The removal of surface parking and replacement with an underground parking area also reduces the visual impact of the parking area. At the front of the property the proposed retention of the existing crossover and entrance position does not introduce a harmful visual impact;
- ▶ *The council will require off street parking to preserve a building's setting and the character of the surrounding area*
 - Motion response: The proposed retention of off street parking has no impact on the setting or character of the building given its location to the rear of the property;
- ▶ *Preserve any means of enclosure, tree, etc that make a significant contribution to the visual appearance of the area*

- Motion response: The proposed retention of the existing crossover and driveway has no impact on the visual appearance of the area;
- ▶ *Provide adequate soft landscaping, permeable surfaces, etc to offset adverse visual impacts and increase in surface run-off.*
- Motion response: The driveway will be reconstructed with materials offering improved permeability. No increase in surface run-off is expected.

Appendix 2 Parking Standards

2.12 The Appendix 2 Parking Standards aim to “*deter unnecessary car use*” and are set at maximum levels. With the exception of residential development standards for general parking are based on a ratio per square metre of development. For residential development 1 space is allowed for wheelchair housing. For general car parking a maximum of 0.5 spaces per dwelling is allowed in low parking provision areas and in the rest of the borough the standards are 1 space per dwelling.

2.13 The accompanying notes to Appendix 2 state that calculations for a specific scheme should be rounded down to the nearest whole number, noting that “*this practice will ensure that marginal floorspace increases are not used as a justification for excess spaces*”.

2.14 The parking standards do not specifically refer to the approach for deriving residential car parking when there is an odd number of dwellings. Similarly there is no differentiation in respect of dwelling size.

London Plan

2.15 The Mayor’s London Plan refers to residential car parking standards based on an increasing level of provision as the size of the dwelling increases although it is acknowledged that development in areas of good public transport accessibility should aim for less than one space per unit. The recently published Housing SPG recommends up to one space per unit for large dwellings in areas of excellent accessibility but also notes that there is a need for flexibility. It quotes:

“...the approach to parking provision for smaller dwellings is sometimes literalist in the sense that ‘less than 1 space per unit’ is interpreted as being as far below 1 as possible rather than embracing the flexibility of the Plan to enable provision to be ‘up to 1’. Policy should be applied appropriately in the local circumstances of each case, having regard to the degree of flexibility inherent in strategic policy. More generally, relevant authorities should seek to ensure that a balanced approach, taking proper account of all material considerations, is taken when implementing parking policy.”

2.16 The Mayor's Housing SPG continues:

"...Account should also be taken of the planned social composition of a development and its bearing on parking demand, more general changing attitudes towards car ownership and use, and the need to coordinate on- and off-street parking provision to address local amenity, congestion and safety concerns".

[National Planning Policy Framework](#)

2.17 In setting car parking standards the March 2012 NPPF advises local authorities to have regard to the accessibility of a development in addition to the type, mix and use, local car ownership levels and an overall need to reduce the use of high-emission vehicles.

Policy Summary

2.18 Policy DP18 explains that the Council will "*generally expect*" development to be car-free but does not require it to be. Proposals for car parking will be "*resisted*" and should be supported by an assessment. The Core Strategy sets out the three objectives car-free development in respect of freeing space, allowing additional development in congested areas and promoting sustainable modes of transport. The proposed development is considered to be compatible with these objectives, such that they are relevant.

2.19 Policy DP19 presents ten parking related considerations for which non-compliance would cause the Council to resist the proposals. These include impact on highway safety, visual amenity and impact on on-street parking demand. Given that the proposed development seeks to retain part of an existing parking supply at the property and enhance the appearance of an existing driveway and crossover the proposed development is considered to be compatible with the considerations of Policy DP19.

2.20 With regard to the Appendix 2 Parking Standards the proposed dwelling will be fully accessible for wheelchair users and will benefit from direct access to the property's lift via the basement parking area. The Standards require a disabled parking space for wheelchair accessible housing. With regard to general residential parking Appendix 2 does not take account of the size of a dwelling.

2.21 The London Plan does acknowledge an increasing demand for car parking as the size of the dwelling increases. The Housing SPG recommends that the local circumstances of each application are considered, that a degree of flexibility is applied and to consider the social composition of a development on parking demand.

2.22 Finally, the NPPF also asks that parking policies reflect the type and size of development and likely levels of car ownership.

3.0 Practical Considerations

- 3.1** As a former office building offering 1,534 square metres of floor space there would be a noticeable demand for travel to and from the building, both by private vehicle and by public transport, with additional vehicular trips arising from servicing activity.
- 3.2** Examination of the TRAVL database suggests a total of 120 two-way person trips would be generated during each of the 8.00am - 10.00am and 5.00pm – 7.00pm peak periods. Of these, 8 two-way vehicle trips are expected during the morning period and 15 two-way vehicle trips are expected during the evening period.
- 3.3** By comparison a single dwelling is expected to generate significantly less demand for travel and fewer vehicle trips in particular.
- 3.4** As a consequence the proposals offer an improvement to conditions on both the footway and the adjacent road network, compatible with the Council's policy objectives.
- 3.5** Given that the vehicle crossover already exists there is no harmful impact on the supply of existing on-street car parking and given the reduction in demand for vehicle movements there is a demonstrable benefit to other road users.
- 3.6** The economic reality of a dwelling as substantial as that proposed is that a level of car ownership is to be expected, with the proposed house offering 7 bedrooms plus accommodation for a nanny and two bedrooms for house staff. The size of the building is a material consideration, a factor acknowledged in both the NPPF and recent London Plan planning guidance.
- 3.7** Hence there are a number of compelling justifications to support the proposed retention of residential car parking:
- ▶ The previous use of the building and the level of traffic generation and other travel demands;
 - ▶ The existence of on-site car parking for 8 vehicles and an existing vehicle crossover meaning that a new crossover is not required;
 - ▶ The significant reduction in vehicle trips and travel demand associated with the change of use;
 - ▶ There is consequently a positive impact on highway safety, traffic flows and the pedestrian environment;
 - ▶ Visually the existing parking area will be enhanced;

- ▶ The Council's current approach to parking standards is not realistic to the varying demands of larger family dwellings;
- ▶ The size of the dwelling is likely to be atypical of what was envisaged when the parking standards were drafted;
- ▶ It should be expected that the size and type of dwelling will generate a level of car ownership;
- ▶ The London Plan and NPPF invites councils to take a flexible approach; and
- ▶ On-site disabled parking provision is required.

4.0 Summary and Conclusion

- 4.1** The proposed change of use at 9 Arkwright Road from office to residential, including external modifications, has been considered in light of the intention to retain 4 on-site car parking spaces in a basement. At least one of the spaces will be wheelchair accessible with access throughout the house offered by a lift between each floor. The spaces will be served via an existing vehicle crossover and driveway which previously offered access to 8 car parking opportunities to support the office.
- 4.2** It is evident that there will be a significant reduction in travel demand as a result of the change of use, including vehicle trips made to and from the former office building during traditional peak periods.
- 4.3** Given the established use at the site there are demonstrable benefits from the proposed development in respect of highway and pedestrian safety; the site benefits from an existing crossover which provides suitable visibility splays for drivers leaving the site.
- 4.4** Having regard to other policy considerations, such as visual impact and demand for on-street car parking, the proposals accord with policy objectives.
- 4.5** The dwelling will offer substantial family accommodation with 7 bedrooms plus accommodation for staff. Hence the development's size, nature and market is such that it is unrealistic to expect that a car-free lifestyle would be appropriate.
- 4.6** It is considered inappropriate to strictly apply the Appendix 2 Parking Standards in this instance as they are not relevant to the particular realities of development of this nature. Factors such as size, type, mix and social composition are relevant considerations by reference to the London Plan and NPPF.
- 4.7** In conclusion the retention of a reduced number of on-site car parking spaces to serve the residential development will not cause harm to the public highway, will not harm pedestrians, will not impact on on-street car parking demand, will not cause congestion. It will lead to a reduction in travel demand overall and to vehicle trip generation in particular and is considered to be acceptable development in this context.

