

TRANSPORT STATEMENT

68-70 Red Lion Street, London, WC1R 4NY

Site and Location

The site is located at 68-71 Red Lion Street, London, Holborn, a highly accessible central location. The building is located within the Holborn Growth Area.

Development Proposals

The application seeks permission for "Change of use from office use (Class B1) to a flexible B1/D1 use".

Background

BPP is a well-known and respected higher education provider and has been in occupation of the building since 30 July 2001.

The proposal does not include any internal or external alterations, nor will any additional floorspace be provided as a result of the application. The existing operating hours are Monday – Thursday 7.00-23.00, Friday 7.00-22.00, Saturday 8.00-20.00, Sunday 8.00-22.00. These opening hours will not change as a result of the proposal.

BPP own this building and have been operating in it for over ten years, using it for teaching and offices. They have no intention to leave the building which operates as their law school, nor is there is there any intention to change the operation of the building. The purpose of the application is to regularise BPP's use within the building and allow them to continue using the building in the way they have been for over ten years.

Vehicular Movements

The site does not include any car parking, nor is there any scope to provide any. The proposal therefore will not cause any change in trip generation.

The site does however, provide, 12 cycling spaces, thus encouraging sustainable transport modes in line with PPG13.

Public Transport

The site is highly accessible with a PTAL rating of 6b which equates to an "Excellent" rating within TFL's Transport Assessments Best practice guidance document. As there is no car parking available on site, students and staff travel to the building on public transport, on foot or bike. The following table shows distances to the closest bus stops and underground stations.

TABLE: DISTANCES FROM PUBLIC TRANSPORT FACILITIES

Stop	Route	Distance (meters)	Walk time (mins)
BUS			
High Holborn – Brownlow Street	242	191.89m	2.4 mins
	521	191.89m	2.4 mins
	8	191.89m	2.4 mins
	25	191.89m	2.4 mins
Holborn Police Station	243	250.26m	3.13 mins
	38	250.26m	3.13 mins
	55	250.26m	3.13 mins

Conway Hall	19	297.16m	3.71 mins
Bloomsbury Red Lion SQ	98	273.09m	3.41mins
Holborn Station Kingsway	91	432.78m	5.41mins
	X68	432.78m	5.41mins
	68	432.78m	5.41mins
	171	432.78m	5.41mins
	168	432.78m	5.41mins
	188	432.78m	5.41mins
	1	432.78m	5.41mins
	59	432.78m	5.41mins
LU /LRT			
Holborn	Central Line	389.31m	4.87 mins
	Piccadilly Line	389.31m	4.87 mins

Servicing

There is no off street loading bays and the on street loading bays are used for deliveries.

Travel Plan

Transport for London's Transport Assessment Best Practice Guide, states that, the primary aim of travel plans, is to reduce car travel to and from a proposed site and encourage the greater promotion of more sustainable forms of transport.

In this case, it is unreasonable to impose a condition requiring a Travel Plan, as the only means of access to the building is by public transport and by foot or bike. The site does not include any car and it is a car free development. Circular 11/95 'Use of Conditions in Planning Permission' states that conditions should not be imposed unless they are both necessary and effective, and do not place unjustifiable burdens on applicants. This Circular states that conditions should be:

- i) Necessary;
- ii) Relevant to planning;
- iii) Relevant to the development to be permitted;
- iv) Enforceable;
- v) Precise; and
- vi) Reasonable in all other respects.

As the site in question does not include any car parking, the sole means of accessing the site is by sustainable means such as, public transport, on foot or bike. Imposing a condition whereby a Travel Plan is required is both unnecessary and unreasonable and thus goes against the requirements laid out in the Circular.

Conclusions

BPP have occupied the building for over ten years. The application for B1/D1 use will regularise their use of the building. The proposal does not include any additional floorspace nor will it change the nature of the use in the building.

The building is not served by any car parking but is served by 12 cycle parking spaces and excellent public transport facilities.

The previously approved use of the building was B1 and the proposed B1/D1 use will not generate any additional vehicular movements on the local highway. Students and staff associated with either a B1 or D1 use would continue to travel to the building by sustainable modes of transport.