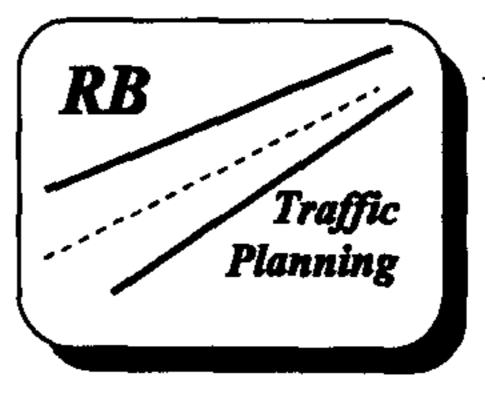
# Rowland Bilsland Traffic Planning

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PROPOSED CHANGE OF USE FROM HOSTEL TO APARTHOTEL ON FIRST, SECOND AND THIRD FLOORS AND RESIDENTIAL FLATS ON FOURTH FLOOR 34A-36, KILBURN HIGH ROAD, LONDON NW6.

TRANSPORT ASSESSMENT



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### 1.0 INTRODUCTION

- Rowland Bilsland Traffic Planning Limited are instructed by Archetype on behalf of Wickstone Limited, to advise on highway and transport matters in connection with a proposed change of use from hostel to aparthotel and residential flats at 34a to 36, Kilburn High Road, London, NW6.
- This Transport Assessment is prepared in support of the planning application submitted to the London Borough of Camden for a proposed change of use from hostel to aparthotel accommodation on the first, second and third floors, consisting of 38 self-contained suites, and 12 residential flats on the fourth floor of the existing building at 34a to 36, Kilburn High Road, London, NW6.
- 1.3 The proposed development is illustrated on a series of drawings prepared by Archetype, submitted with the planning application.
- This supporting Transport Assessment considers highway matters relevant to this proposed change of use and draw comparisons between the originally approved hotel development, the subsequently approved hostel development and the current application for aparthotel suites with residential flats.
- 1.5 Reference is made to site traffic generation and parking standards applicable for the hotel use, hostel use and the current aparthotel and residential uses.
- This report gives details of the local bus routes and details of the London
  Underground and main line train services which combine to provide a comprehensive public transport network within very easy walking distance of the application site.
- 1.7 This report draws the conclusion that the transport impact of the proposed change of use to provide aparthotel suites and residential flats is acceptable.

#### 2.0 BACKGROUND

- Full details of the background to applications for redevelopment at the application site are given in the Planning Statement, prepared by Martin Ledger Associates, submitted with the planning application. In the Transport Assessment, details are given on highway and transport matters relevant to this application for a proposed change of use.
- 2.2 This section gives brief details of the previous hotel and hostel development proposals for the application site. Originally planning application reference: PW9902721 was submitted to the London Borough of Camden and registered in March, 2000. That application was for redevelopment of the site at 34a to 36, Kilburn High Road to provide a 5 storeys plus basement building comprising a 40 bedroom hotel at first, second, third and fourth floor levels, A1 retail units at ground floor and Class D2 health club with Class B1 offices at basement level. That application was approved subject to completion of a Section 106 Agreement. It is relevant to note that that application was approved without on-site parking provision.
- 2.3 Subsequently, a further application reference: PWX0302236 was submitted to the London Borough of Camden in March, 2003 for a new 5 storey plus basement building providing Class D2 health club and snooker hall at basement level, Class A1 retail unit at ground floor level and a hostel for homeless people at first, second, third and fourth floor levels. The hostel was, at that time, approved with 40 bedrooms accommodation.
- It is relevant to note that the proposed uses for the basement and ground floor for the 2003 planning application were similar to the previously approved hotel development, but the office accommodation was replaced with a snooker hall leisure use.
- 2.5 Effectively, the second planning application was for a hostel use with 40 units of accommodation whereas the original approval was for a hotel with 40 bedrooms.

- 2.6 It is understood that the hostel application was approved subject to completion of a Section 106 Agreement.
- 2.7 The development has taken place on the application site and a 5 storey building with basement level has been completed. It accommodates the approved leisure uses at basement level and retail use at ground level. The building provides 49 units of hostel accommodation on the first, second, third and fourth floor levels. The applicant recognises that the planning permission for the hostel use referred to the original approval of 40 hostel units. The additional 9 units have been achieved by sub-division of the originally approved 40 units. It is understood that the Planning Officer has given an indication that 49 hostel units would have been equally acceptable. However, for the purpose of this Transport Assessment, reference will be made to the hostel use and to accommodation of 40 hostel rooms.
- 2.8 The development of the leisure uses at basement level and the retail use at ground floor have now been completed and are in use. Whilst the hostel accommodation has been completed on the upper four floors, it is understood that the hostel accommodation is not currently in use.

# 3.0 BRIEF DESCRIPTION OF THE APPLICATION SITE AND SURROUNDING ROAD NETWORK

- 3.1 The application site has frontage on the east side of Kilburn High Road immediately to the south of the junction with Springfield Lane, a one-way street leading eastwards from Kilburn High Road. The customer entrance to the retail use at ground level is on Kilburn High Road. Approximately midway along the frontage to Springfield Lane is the entrance for the leisure uses at basement level and the accommodation units on the first, second, third and fourth floors.
- 3.2 It is relevant to note that the hostel use has been approved, subject to a Section 106 Agreement, without on-site parking provision. This is considered to be appropriate for the application site, in a location highly accessible to the public transport network. It is relevant to note that the leisure uses at basement level and retail use at ground floor level have also been approved without on-site parking provision.
- 3.3 The network of residential streets in the general area of the application site, to the east and west of Kilburn High Road, are within the Kilburn Controlled Parking Zone (CPZ). The controlled parking zone restrictions apply between 08.30 and 18.30 hours on Mondays to Fridays. Within this zone, on-street parking is generally restricted and only available for holders of residents' parking permits. There is a very limited number of on-street parking spaces available within the zone for general car parking on a 'pay and display' basis.
- In the general area of the application site, Kilburn High Road, Cambridge Avenue and Belsize Road accommodate 8 daytime bus routes and 4 night bus routes. There are bus stops located within easy walking distance of the application site on Kilburn High Road, Cambridge Avenue and Belsize Road to all of these bus routes. Full details of the bus routes and locations of the bus stops are given in a subsequent section of this report.
- 3.5 The application site is within easy walking distance of Kilburn High Road Station on the main line railway between Euston and Watford Junction, Kilburn Park

Station on the London Underground Bakerloo Line and within reasonable walking distance of Kilburn Station on the London Underground Jubilee Line and Brondesbury Station on the main line (North London) between Woolwich, Stratford, Willesden Junction and Richmond.

3.6 Details of the London Underground and main line railway service are provided in a subsequent section of this report.

#### 4.0 PUBLIC TRANSPORT

- 4.1 It is relevant to consider the location of the application site and its accessibility to the public transport network.
- 4.2 The site is well located for access to 8 daytime and 4 night bus routes and is easily accessible to the main line railway network and to the Bakerloo and Jubilee Lines of the London Underground Railway.
- 4.3 Bus routes 16, 98, N16 and N98 run straight along Kilburn High Road. The bus stop for southbound buses, to the south of the application site, is within 70 metres of the entrance for the hostel building. The bus stop for northbound buses is within 260 metres of that entrance. Bus routes 31, 32, 206, 316, 328, 632, N28 and N31 run in each direction along Cambridge Avenue, between Kilburn High Road and Kilburn Park Station. For northbound and eastbound buses the bus stop on the north side of Cambridge Avenue is within 70 metres of the entrance to the hostel building. The bus stop for south and westbound buses is on the south side of Cambridge Avenue, within 60 metres of the entrance to the hostel building.
- 4.4 Bus routes 31, 32, 206, 316, 328, 632, N28 and N31 run from Cambridge Avenue northwards along Kilburn High Road. Then bus routes 31, N28 and N31 continue along Belsize Road whereas bus routes 32, 206, 316, 328 and 632 continue northwards along Kilburn High Road.
- 4.5 The bus stops for all of these bus routes are within easy walking distance of the entrance to the building at the application site. A summary of the bus routes and frequencies is given in Table K11, a copy of which is provided in Appendix 4.
- 4.6 The application site is within 60 metres of Kilburn High Road Station on the main line railway between Euston and Watford Junction. Table K21, a copy of which is provided at Appendix 5 gives a summary of this train service.

- 4.7 Kilburn Park Station, within 320 metres of the application site is on the London Underground Bakerloo Line. Table K22, a copy of which is provided at Appendix 6 gives a summary of this train service.
- 4.8 Brondesbury Station, on the main line (North London) railway is located adjacent to Kilburn High Road at a distance of approximately 1,125 metres, to the north of the application site. The North London Line provides a link between Woolwich, Stratford, Willesden Junction and Richmond. Table K23, a copy of which is provided at Appendix 7 gives a summary of this train service.
- 4.9 Kilburn Station on the London Underground Jubilee Line is also located adjacent to Kilburn High Road. Table K24, a copy of which is provided at Appendix 8 gives a summary of this train service.
- 4.10 For proposals in Greater London, it is relevant to consider the accessibility of an application site. The recognised method of assessing accessibility is outlined in the document entitled "Sub-Matter 5b Parking Strategy" which formed part of the Transport for London Written Submission Annex 1 to the Examination in Public of the London Plan. That document indicates the methodology for measuring Public Transport Accessibility Levels (PTALS).
- 4.11 Public Transport Accessibility Levels are a detailed and accurate measure from a specific point or site to the public transport network taking into account walk access time and service availability. The document indicates that the method is essentially a way of measuring the density of the public transport network at a particular point. The current methodology was developed in 1992 by the London Borough of Hammersmith and Fulham and the model has been thoroughly reviewed and tested and agreed by the London Borough led PTAL Development Group as the most appropriate for use across London. The document indicates that generally service frequency data is collected for the morning peak period, specifically between 08.15 and 09.15 hours.

- 4.12 Walk times are calculated from the specified point of interest (in this case the application site) to all public service access points including bus stops and railway stations within pre-defined catchment areas.
- 4.13 Walk access times are measured from the point of interest (the application site) to the service access point (SAP) and an average walk speed of 4.8 kph is used.
- 4.14 A number of parameters define the extent of the walk catchment area. For buses the maximum walk time is defined as 8 minutes or a distance of 640 metres. For rail, underground and light rail services, the maximum walk time is usually defined as being 12 minutes or a distance of 960 metres. Any service access points beyond these distances are rejected.
- 4.15 The model parameters include a Reliability Index which for a bus service is taken as 2 minutes and for a rail service is taken as 0.75 minute. The calculation of the Accessibility Index for the site is summarised in Table K41, a copy of which is provided at Appendix 11.
- 4.16 The calculation of the Accessibility Index for each of the bus routes and each of the main line railway and London Underground routes gives a combined Accessibility Index of 26.854. The conversion of the Accessibility Index to the relevant PTAL value is given in Table 3 of the Transport for London document. That table is included for convenience in Table K41 of this report. For an Accessibility Index above 25.01, the equivalent PTAL value is 6. For this site the Accessibility Index is calculated as 26.854 and consequently, the PTAL value is calculated as 6. This indicates that the site is within an area of high accessibility to the public transport network.
- 4.17 Annex 4 of the London Plan makes reference to Public Transport Accessibility Levels. It indicates at paragraph 7 that:-

"Public Transport Accessibility Levels (PTALS) have been adopted by TfL to produce a consistent London wide public transport access mapping

facility to assist boroughs with locational planning and assessment of appropriate parking provision by measuring broad public transport accessibility levels. This method provides a consistent framework which allows difference in public transport accessibility in different parts of London to be taken into account. The PTAL's method is a useful tool but does not preclude the use of additional assessment methods to assess a particular development or location."

#### Paragraph 7 continues:-

"There is evidence that car use reduces as access to public transport as measured by PTAL's increases. Therefore, given the need to avoid over provision, car parking should also reduce as public transport accessibility increases."

- 4.18 The application site is, therefore, in a location highly accessible to the public transport network, where nil on-site parking provision is considered appropriate for the proposed uses.
- 4.19 A summary of walk distances between the application site and local facilities, including the railway stations, is given in Table K31, a copy of which is provided at Appendix 9.
- 4.20 A summary of walk distances and walk times between the application site and the bus stops is given in Table K32, a copy of which is provided at Appendix 10.

#### 5.0 THE APPLICATION PROPOSAL

- This planning application is for the proposed change of use from the previously approved hostel use on the first, second, third and fourth floors of the building to an aparthotel with 38 suites on the first, second and third floors and 12 residential flats on the fourth floor.
- The original 1999 planning application for a hotel and the 2003 planning application for a hostel both included Class D Leisure Uses at basement level and Class A1 Retail Use at ground floor. This application retains the same leisure and retail uses at basement level and ground floor level. The only changes are, therefore, proposed to the upper four floors.
- 5.3 The 1999 application approved the use of the first, second and third floors for an hotel. The current planning application seeks approval for the same first, second and third floors for an aparthotel, which is equivalent in many ways to an hotel. One significant difference is that an aparthotel does not provide a bar or restaurant for guests, and does not provide any facilities for non-residents. In that respect, an aparthotel would be expected to generate few traffic movements than an hotel. It must follow that if the first, second and third floors have been approved for a hotel use, as far as highway and transport matters are concerned, the aparthotel use of the three floors must be equally acceptable or perhaps, beneficial.
- 5.4 It must, therefore, follow that for the first, second and third floors of the building, since an hotel use was approved in the 1999 planning application and a hostel use was subsequent approved in the 2003 planning application, then the use of those three floors as an aparthotel must be acceptable, as far as highway and transport matters are concerned.
- 5.5 The original 1999 planning application approved the fourth floor for an hotel use and the 2003 planning application approved the fourth floor for a hostel use. The current planning application proposes that the fourth floor of the building should be designed to provide 12 independent residential apartments.

- Since the D2 Leisure Uses at basement level and the A1 Retail Use at ground floor level have already been approved, and an hotel use and hostel use have been approved for the first, second and third floors in the previous applications, then the only change results from the proposed use of the fourth floor. The fourth floor has been approved for hotel use and for hostel use and is now proposed for residential use.
- 5.7 In the following section a comparison is drawn between hotel use, hostel use and residential use for the fourth floor level.

# 6.0 SITE TRAFFIC GENERATION – COMPARISON BETWEEN EXISTING AND PROPOSED USES

In this section, estimates are given for the number of trips which may be expected for the hotel, hostel and proposed residential use of the fourth floor of the existing building, the gross floor area of which is 715 sq. metres.

#### Vehicle Movements

- To establish an estimate for the number of traffic movements which may be expected for an hotel use, a hostel use and a residential (apartments) use, reference is made to the recognised TRICS database.
- 6.3 For the approved hotel use, reference is made to trip rate information available for TRICS Land Use 06 Hotel, Food and Drink/A Hotels. The daily trip rate is derived as 8.01 trips per 100 sq. metres of gross floor area. Application of this trip rate to the gross floor area of 715 sq. metres for the fourth floor indicates that typically, a hotel use in that area would generate in the order of 58 vehicle movements, that is, 29 arrivals with 29 departures throughout the day. The trip rate information and estimated vehicle movements for the hotel use are summarised in Table K1, a copy of which is provided at Appendix 1.
- 6.4 For the proposed residential use, reference is made to TRICS Land Use 03 Residential/C Flats Privately Owned. The combined trip rate per dwelling is derived as 2.74. Application of this trip rate to the proposal for 12 apartments on the fourth floor gives an estimate of 32 vehicle movements, that is, 16 arrivals with 16 departures. The trip rate information and estimates of vehicle movements for residential flats are summarised in Table K2 a summary of which is provided at Appendix 2.
- A comparison is now drawn between the estimated vehicle movements for the approved hotel use of the fourth floor and the proposed residential use of the fourth floor of the building. On the basis of the trip rates referred to in the preceding paragraphs, the proposal would be expected to lead to one less vehicle movement in the AM peak hour, one less vehicle movement in the PM peak hour

and 26 vehicle movements less throughout the day. In terms of vehicle movements the proposal, therefore, represents a benefit since it would be expected to attract fewer vehicle movements. This comparison of traffic movements is summarised in Table K3, a copy of which is provided at Appendix 3.

- It is, of course, recognised that the accessibility of a site has an influence on the means of travel, in this case, for visitors to the hotel or hostel, or for residents of the apartments. The application site is in a highly accessible location in easy walking distance of 8 daytime and 4 night bus routes and within easy walking distance of the railway stations at Kilburn High Road and Kilburn Park. In this highly accessible location it is expected that any of these uses would, in practice, generate fewer vehicle movements than given in these estimates. However, on the basis that a similar proportion of guests for the hotel/hostel or residents of the apartments would walk or use the public transport network, it must follow that the 12 residential apartments would be expected to generate fewer trips than an hotel/hostel use of the fourth floor. In Section 4 it has been demonstrated that the Accessibility Index of the application site is 26.854, and that the PTAL value is 6, which confirms that the application site is in an area of high accessibility to the public transport network.
- A clear conclusion is drawn, that a proposed residential use of the fourth floor, comprising 12 apartments would be expected to generate fewer trips than an hotel or hostel use of that same fourth floor.

6.8 National guidance in the form of PPG3 Housing and PPG13 Transport indicates the importance of restraint on car parking, to promote sustainable transport choice in an urban area where a site is easily accessible to a comprehensive public transport network.

#### PPG3 - Housing

6.9 I quote firstly from paragraph 59 of PPG3:-

"Local authority requirements for car parking especially off-street car parking are also a significant determinant in the amount of land required for new housing."

Secondly, I quote from paragraph 60 of PPG3:-

"Car parking standards for housing have become increasingly demanding and have been too rigidly applied often as minimum standards. Developers should not be required to provide more parking than they or potential occupiers might want, or to provide off-street parking when there is no need, particularly in urban areas where public transport is available or where there is a demand for car free housing."

Thirdly, I quote from paragraph 61 of PPG3:-

"Local authorities should revise their parking standards to allow for significantly lower levels of off-street parking particularly for developments in locations such as town centre where services are readily available by walking, cycling or using public transport."

6.10 The general thrust of this advice is that local authorities should reduce their parking standards to encourage use of alternative modes of transport. Paragraph 60 specifically indicates that local authorities should not require developers to provide more parking than they or potential occupiers might want or to provide off-street parking when there is no need.

#### PPG13 - Transport

- 6.11 Chapter 3 of PPG13 deals with managing travel demand. Paragrah 51 is particularly relevant. I quote from this paragraph:-
  - "(i) Local authorities should ensure that as part of a package of planning and transport measures levels of parking provided in association with development will promote sustainable transport choices.
  - (ii) Local authorities should not require developers to provide more spaces than they themselves wish other than in exceptional circumstances which might include, for example, where there are significant implications for road safety which cannot be resolved through the introduction or enforcement of on-street parking controls."
- 6.12 In this case, the applicant considers that no on-site parking is required for the proposed development in this highly accessible location, confirmed by the PTAL value of 6, close to extensive retail, leisure and commercial facilities of Kilburn High Road and the surrounding area. This same conclusion has previously been reached by the London Borough of Camden since the previous hotel and hostel uses at first, second, third and fourth floor levels, with leisure and retail uses at basement and ground floor levels have previously been approved without on-site parking provision.

#### 7.0 COMMENTS ON PARKING STANDARDS

- 7.1 The relevant car parking standards are given in the Camden Unitary Development Plan approved in 2003. Appendix 6 of the UDP gives details of the parking standards for various land uses including hotels, hostels and residential apartments. The document provides standards for cycle parking, car parking for disabled persons, arrangements for service vehicles, pick-up and set-down facilities for coaches and taxis, staff parking for hotel and hostel uses and resident parking for hotels and hostels. For residential development it refers to parking for cycles, parking provision for disabled persons and general car parking
- 7.2 Firstly, it is relevant to note that in all cases, the specified parking standard for hotels is the same as that for hostels. In other words, for the approved hotel use, the permitted hostel use and the proposed aparthotel use of the first, second and third floors of the building, the parking requirements are identical. The hotel use and hostel use have been approved without any on-site parking provision, without taxi or coach pick-up facilities, without cycle parking and without on-site parking provision for use by disabled persons.
- 7.3 It must, therefore, be reasonable to draw the conclusion that for the proposed aparthotel on the first, second and third floors of the building, the same conclusion can be drawn on parking provision and on pick-up and drop-off facilities.
- 7.4 On that basis, it is only the fourth floor of the building for which parking provision should now be considered, since it is that floor for which a change of use is proposed, from hotel or hostel to residential apartments.
- 7.5 For general car parking for residential uses, the Camden UDP indicates that a maximum of 0.25 space per dwelling would be permitted. For the proposed 12 apartments, a maximum of 4 spaces would be permitted. It is understood that in this central location, easily accessible to the public transport network and to all local facilities, the London Borough of Camden would not permit any on-site parking for residential development.

- 7.6 The parking standard document (Appendix 6) deals with parking for people with disabilities. It indicates that for general housing, where justified by the likely occupancy of the dwelling and reserved for use by people with disabilities, above a threshold of 30 units, 1 space per 10 units, or part thereof, with dimensions suitable for use by people with disabilities should be provided. The apartments at fourth floor level are not proposed specifically for use by people with disabilities, and at fourth floor level the apartments are unlikely to attract such demand. It follows, therefore, that there is no on-site parking requirement for parking by people with disabilities for the residential use.
- 7.7 In the CPZ area, in the network of residential streets adjacent to the application site there are dedicated parking spaces for disabled persons, including spaces on Springfield Lane, immediately to the rear of the building.
- 7.8 The UDP makes reference to the need for cycle parking provision for residential dwellings. It indicates that one cycle storage or cycle parking space should be provided per dwelling for residents. The application proposal includes secure cycle storage for 28 cycles for this development, at ground floor level. Twelve of these cycle parking spaces are allocated for the proposed residential use whilst the remaining 16 cycle spaces are allocated for the aparthotel use. This cycle parking provision complies with the Camden UDP.

## 8.0 SUMMARY AND CONCLUSIONS

- 8.1 This Transport Assessment is prepared to support the planning application submitted to the London Borough of Camden for a proposed change of use from the previously approved hostel use on the first, second, third and fourth floors of the building to the proposed aparthotel use on the first, second and third floors and residential (apartments) use on the fourth floor of the recently constructed building.
- Reference has been made to the original 1999 planning application approved for hotel use and the more recent 2003 planning application approved for hostel use of the building.
- 8.3 It is concluded that, as far as highway and transport matters are concerned, since an hotel use had previously been approved for the first, second and third floors of the building, there is no practical difference between that use and the proposed aparthotel use of those same three floors.
- The proposed change of use does, however, affect the fourth floor of the building. An hotel use and more recently a hostel use have been approved for the fourth floor. In all cases the gross floor area of the respective floors of the building have remained the same for the original hotel proposal, the subsequent hostel proposal and the current aparthotel and residential proposal.
- As far as highway and transport matters are concerned, the use of the fourth floor as an hotel has now been compared with the proposed use of the fourth floor as 12 residential apartments.
- Reference to the TRICS database shows that fewer trips would be expected for the proposed residential use than for the previously approved hotel use, in that same gross floor area of 715 sq. metres. On that basis, since the hotel use was acceptable, the proposed residential use should be equally acceptable.

- Parking requirements for the existing and proposed uses have been considered on the basis of the Camden UDP requirements. It has been concluded that the only difference which arises is that 12 secure cycle parking spaces should be provided for the 12 residential apartments, whereas fewer cycle parking spaces would have been required for the use of the fourth floor of the building as an hotel.
- Reference to the Camden UDP parking standards indicates that 16 cycle parking spaces should be provided for the hotel use on the first, second and third floors of the building together with the requirement for 12 cycle parking spaces for the residential apartments on the fourth floor. That gives a requirement for 28 cycle parking spaces. The application drawing shows that 28 secure cycle parking spaces would be provided at ground level for the proposed aparthotel and residential uses. The cycle parking provision, therefore, satisfies the respective cycle parking standards given in the Camden UDP.
- 8.9 The original hotel use and the subsequent hostel use have both been approved without on-site car parking provision and without any specific pick-up and drop-off facility for taxis and coaches. Since those arrangements have been approved for the original hotel use, it is concluded that those same arrangements would be appropriate for the proposed aparthotel use.
- 8.10 For the original proposal it was agreed that servicing for the retail unit on the ground floor of the building could take place from vehicles parked on the public highway, subject to time restrictions imposed for loading and unloading. That same arrangement was acceptable for the previous hotel use and should, therefore, be acceptable for the proposed aparthotel use.
- 8.11 The application site, located on Kilburn High Road, within the main High Road shopping centre is easily accessible to the extensive range of retail and commercial facilities of the town centre. The application site is well located for easy access to bus stops on Kilburn High Road, Cambridge Avenue and Belsize Road for access to 8 daytime and 4 night bus routes. The application site is within easy walking distance of Kilburn High Road Station on the main line railway,

Kilburn Station on the London Underground Bakerloo Line, Brondesbury Station on the main line railway and Kilburn Station on the London Underground Jubilee Line.

- 8.12 To demonstrate the accessibility of the application site to the public transport network, the Public Transport Accessibility Level (PTAL) calculation shows the Accessibility Index to be 26.854 which gives a PTAL value of 6. This PTAL value confirms that the site is highly accessible to the public transport network.
- 8.13 Consideration has been given to the Camden UDP parking standards and it has been demonstrated that the application proposal complies with those standards, recognising that the site has previously been approved for hotel use and hostel use.
- 8.14 The conclusion is reached that the transport impact of the application proposal is acceptable.