



ttp consulting
transport planning specialists

Karawana Ltd

**29 New End, Hampstead, LB
Camden**

Summary Proof of Evidence

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1 INTRODUCTION

1.1 My name is Nick Bond.

1.2 TTP have been retained by Karawana Ltd (“the appellant”) to provide traffic and transport advice in relation to the proposed redevelopment of 29 New End (“the appeal site”) in the London Borough of Camden since 2011.

2 EXISTING CONDITIONS

- 2.1 The site comprises a former 75 bedroom hostel, which is currently vacant but retains a lawful use for that purpose.

Parking

- 2.2 The site lies within CPZ zone CA-H, with controls in place 09:00 to 20:00, Monday to Saturday.

Public Transport

- 2.3 The planning application site is reasonably well served by public transport, being within walking distance of Hampstead Station and a number of bus routes served by dedicated bus stops on Heath Street.
- 2.4 The site has a PTAL rating of 2/3 which suggests that the appeal site has reasonable accessibility to public transport and is an appropriate location in principle for residential development.

3 PLANNING POLICY

National Planning Policy

- 3.1 The NPPF, which postdates all local policy takes a deliberately pragmatic and reasonable approach to parking and states (at para 39) that car parking standards should take account of the accessibility of a development and, importantly, "*the type, mix and use of development*".
- 3.2 Earlier at paragraph 32 (third bullet point), it states that "*Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*" This is a new and deliberate attempt to ensure that transportation issues do not stand in the way of economic activity unless such impacts are severe.
- 3.3 My view is that there are no "severe" residual transport impacts arising from the appeal proposal.

Regional Planning Policy

- 3.4 The latest emerging standards are provided in the Draft Further Alterations to the London Plan (January 2014) and are:

4 or more beds: up to 2 spaces per unit
3 beds: up to 1.5 spaces per unit
1-2 beds: 0-1 per unit

- 3.5 These figures are not to be applied mechanistically. The adjacent location and PTAL matrix in the FALP indicates that parking provision of up to 1.5 spaces per unit can be appropriate in urban locations with a PTAL range of 2 to 4.
- 3.6 My view is that when seen against this most up-to-date and relevant policy matrix the provision of 17 spaces strikes the appropriate balance between providing sufficient spaces to promote new development and not so many as to promote excessive car parking, particularly when considered in the context of the public transport accessibility of the site, the mix of units proposed and local car ownership levels.

Local Planning Policy

- 3.7 The Council has produced a Core Strategy and Development Policies Document. In addition, Supplementary Planning Guidance – CPG7 Transport supports the policies in the Core Strategy and Development Policies Document.

- 3.8 Both documents predate the NPPF and its emphasis on transportation reasons for refusal, which requires impacts to be severe.

Policy DP18

- 3.9 Policy DP18 - Parking standards and limiting the availability of car parking provides the Council's detailed approach to parking in new development.
- 3.10 Car parking standards in the borough are to comply with those set out at Appendix 2 of the Development Policies Document.
- 3.11 In the "rest of the Borough" area which includes the appeal site, the provision is 1 space per dwelling. The development is compliant with this provision.

Policy CPG7

- 3.12 Paragraph 5.4 states that car-free and car-capped requirements will apply to developments in the central London area, town centres and other areas of high PTAL (car-free) and where the creation of a new access could lead to on street parking problems. Car-capped will apply to those schemes that would have an unacceptable impact on on-street parking conditions or highway management and safety.

Policy DP19

- 3.13 The potential impacts of parking associated with development in terms of on-street parking conditions and wider environmental conditions are addressed at Policy DP19 "Managing the impact of parking".
- 3.14 The appeal proposal will not, in my view, have a negative impact on parking and is, therefore, compliant with Policy DP19.
- 3.15 With regard to Policies DP20 and DP26 the appellant has worked with Camden to agree a two-way traffic working strategy to reduce the travel distance of construction vehicles through the area and the potential impacts of the construction process have been considered in consultation with the Council and mitigated where practical and officers noted in their report that *"At this stage it is considered that the CMP demonstrates that it is possible to carry out the development in such a way that minimises its impact on local amenity and transport conditions as far as possible, given the large scale of the works involved and the constrained context of the site."*

4 REASONS FOR REFUSAL

Third Reason for Refusal

Car Ownership and Parking Stress

- 4.1 Officers have set out in their report to Committee that with the site having a lawful hostel use it could be occupied by students, medics or professional people which could have higher car ownership and that even if only 10% of past or future occupants secured parking permits that an additional 7 cars could then seek to park in the permit bays surrounding the development were the building on site to be reused in its current configuration.
- 4.2 Therefore in principle I consider that the loss of the 1-2 on-street parking spaces required to provide the vehicular access to the site would represent an improvement in parking stress conditions over what would occur with the reuse of the building on the site.
- 4.3 Were a car free development to be provided disabled badge holders would still be able to apply for permits and to park on-street, giving a potential reduction in parking availability equivalent to the creation of the proposed vehicular access.
- 4.4 Census 2011 data sets out that 45% of households in the local ward do not own a car, somewhat lower than the Borough average of 61%.
- 4.5 On average each household in the ward owns 0.74 cars, compared to an average of 0.48 across the Borough.

Policy Context

- 4.6 The NPPF states that local planning authorities are encouraged to take account of the accessibility of a development and, importantly, "*the type, mix and use of development*" when determining applications and the relevant car parking provision.
- 4.7 Furthermore, in light of the location and the mix of residential units proposed, it is highly likely that many of the 3 and 4 bedroom flats proposed will be occupied by families and a proportion of the 2 bedroom flats by smaller families.
- 4.8 The NPPF also states that car parking standards should take account of "*local car ownership levels*".
- 4.9 A review of car ownership data for Camden indicates that the Hampstead Town Ward exhibits a significantly higher level of car ownership than the Borough average.

- 4.10 The site has a moderate level of public transport accessibility and taking account of the mix of units proposed, the proposed level of car parking at 1 space per residential unit is totally compliant with London Plan parking standards and the Council's own parking standards as set out in policies DP18 and CPG7. The site is clearly not solely dependent on car usage and therefore is in accordance with the requirements of Camden's Policy DP17.
- 4.11 Given the above it is considered that the level of car parking proposed, together with a permit free S.106 Planning Obligation, is in line with the Council's own parking policies.

Traffic Generation

- 4.12 A review of the Trip Rate Assessment Valid for London (TRAVL) database indicates that an inner London residential site of 17 units with a parking ratio of 1.26 spaces per unit (higher than that proposed) would have a peak traffic generation of 5 cars per hour.
- 4.13 It is inconceivable that this level of additional traffic, less than 1 vehicle every 10 minutes could be considered to add materially to any congestion in the area.

Sixth Reason for Refusal

- 4.14 A range of mitigation measures were discussed and agreed with LB Camden in order to minimise the impact of construction vehicles as far as possible.
- 4.15 Some temporary disruption to areas surrounding the development cannot be avoided during construction and this in itself cannot be allowed to prevent the delivery of much needed housing and other development across London.

5 SUMMARY AND CONCLUSION

5.1 The appeal site currently comprises 75 self-contained hostel units, whilst the appeal proposal envisages a redevelopment to provide 17 C3 residential units supported by 17 car parking spaces at basement level, served by a new vehicular access on New End.

5.2 My view is that the level of parking proposed is acceptable for a number of reasons:

- Car Ownership Data – the NPPF, which postdates all relevant local policy states that consideration should be given to local car ownership levels. The Hampstead Town Ward in which the appeal site is located has a high level of car ownership in comparison to the average for the London Borough of Camden reflecting the mix of units in the Ward and, also, the accessibility characteristics. (vis-à-vis the topographical conditions in the area).
- Commercial requirements – a reduction in car parking would impact upon the value of the proposed residential units.
- Policy guidance – the proposals are in line with Camden’s own parking policy and the London Plan, taking account of the accessibility of the site and the mix of units proposed.

5.3 In light of the above, my view is that the level of parking proposed is acceptable in traffic and transport planning terms and will not give rise to any, much less severe harm and, thus, would be wholly in accordance with the requirement of the NPPF as stated at paragraph 32.

5.4 With regard to the impacts of construction traffic the appellant has put in place mitigation measures in order to minimise the residual effects of construction traffic insofar as can be reasonably achieved. These effects are temporary and cannot be avoided and should not be allowed to prevent the delivery of housing on this site.

5.5 The development is not particularly large and schemes of such scale are regularly constructed within London.

Conclusion

5.6 In light of the above, I conclude that the appeal proposal is acceptable in traffic and transport terms.