

# Parking Statement for Planning Application ref: 2016/0279/P

## Flats A and B, 38 Regent's Park Road

This Statement supports our client's application ref: 2016/0279/P for the erection of front, side and rear extensions and conversion of two flats at lower ground, ground and first floor level, to one flat (class C3), at the above address. The Statement sets out the justification for the retention of three existing car parking permits.

### Site Context

The site currently forms two flats, Flat A (lower ground floor), which provides two bedrooms, and Flat B (ground and first floor), which provides four bedrooms. Flat A benefits from one parking permit and Flat B from two parking permits, which allow residents to park within Controlled Parking Zone (CPZ) CA-J in Primrose Hill. The site also benefits from one off-street parking space.

The site is located within an area with a Passenger Transport Accessibility Level (PTAL) of 3.

### Proposed Car Parking

The proposal is for the amalgamation of Flats A and B, together with associated external alterations. The amalgamated residential flat will provide four bedrooms, retaining the existing bedrooms in Flat B.

Our client would like to retain the three existing car parking permits for off-street parking in association with the property, together with the existing car parking space on-site. The Council have already accepted the retention of the existing parking space on-site. However, Camden's Transport Team have suggested the development is car capped.

The following section assesses the requirement for car capped development in the context of the specific proposals of the site and relevant policy and guidance.

### Policy Review and Assessment

**Policy DP18** of Camden Development Policies 2010-2025 sets out that developments in areas of on-street parking stress should be 'car-capped'. However, the justification to this policy at paragraph 18.8 makes it clear that this relates to new developments and is in order to avoid any greater impact on on-street parking.

The proposal is for the amalgamation of two residential units into one unit, and does not propose any new replacement or additional units. The loss of a residential unit will clearly not result in any additional increase to on-street parking stress. Indeed, it will result in less demand for parking as the number of bedrooms, and thus occupants will drop. Visitor numbers and other occasional parking users will also reduce.

**Policy DP19** seeks to resist developments which would add to on-street parking demand where on-street parking spaces cannot meet existing demand, or otherwise harm existing on-street parking conditions. It also seeks to resist development that would create a shortfall of resident's parking.

This is not applicable to the application proposals.

The Council's **CPG7 Transport SPD** provides further guidance in relation to car capped development and parking. Paragraph 5.4 sets out the circumstances where car-capped development should be sought, including:

*"Schemes that would have an unacceptable impact on on-street parking conditions or highway management and safety through the introduction of new units with access to on-street parking permits."*

Furthermore, Paragraph 5.5 states that car-capped housing may be sought *"wherever development involves the creation of one or more additional dwellings – whether newly built, or created by a conversion or change-of-use."*

Paragraph 5.12 states that car capped development will also be sought *"where additional off-street spaces can be accommodated within the development without harming highway or on-street parking conditions, but where additional on-street car parking is not considered acceptable"*. Paragraph 5.13 goes on to explain these circumstances where *"there are parts of the Borough where increasing competition for on-street parking through introducing additional premises with on-street parking rights is not acceptable"*.

It is clear from the above guidance that the aim of car capped development relates specifically to the impact arising from the creation of new additional units, not the loss or amalgamation of residential units, as is the case here. Indeed the application proposals do not include any new additional units. There is a reduction in the number of units, bedrooms and, most likely, the number of occupants, and on this basis it is unreasonable, and indeed contrary to the council's own policies, to request that the development is car capped.

### **Other Considerations**

As per Camden Council's Parking Permits Terms and Conditions 2016/17, and confirmed with the Parking team, one parking permit is allowed per qualifying resident and up to three vehicles can be added to one permit (although only one can be parked during controlled hours).

The proposed amalgamated unit will provide four bedrooms, whereas currently Flat A provides two bedrooms and Flat B provides four bedrooms. Therefore, the number of occupants will be lower, reducing the number of potential permits that could be applied for, and the demand for on-street parking. Notwithstanding this, our client would be happy to enter into an agreement whereby no more than three parking permits are available for the use of the amalgamated property. As such, this will ensure that there will be no additional demand for parking than exists at present and no adverse impact on on-street parking provision, or for other residents, in accordance with the Council's policy objectives and guidance.

Furthermore, the planning application is a resubmission of that previously granted consent in 10 October 2013 (ref: 2013/1041/P). There was no car capping proposed as part of this approval. Indeed, the officer's report notes that:

*“The conversion also has the potential to reduce the demand for car parking on Regent’s Park Road and it is therefore not considered reasonable to seek to secure the resulting flat as car-free.”*

The Council has, therefore, already accepted that the proposal would reduce parking demand. There has been no change in policy or guidance since the grant of this consent, and the above comment, and on this basis it therefore would be unreasonable to expect the development to be car capped.

## **Summary**

The proposal will result in the loss of a residential unit, which will reduce the demand for on-street car parking, as acknowledged by the Council in the previous approval (ref: 2013/1041/P). The Council’s policies and guidance relating to car capped development clearly refer specifically to development which propose additional residential units, and do not apply to circumstances where there is a proposed loss of a residential unit. Indeed, the Council did not request this as part of the previous consent (ref: 2013/1041/P) of which this application forms a resubmission. Instead they took the opposite view and concluded it would not be reasonable to seek a restriction on parking permits. As such, it would be unreasonable to request that the development is car capped.

The reduced number of occupiers arising from the proposed reduction in the number of units will reduce the amount of car parking permits that could be applied for and consequently reduce demand for on-street parking. Notwithstanding this, our client would be happy to enter into an agreement whereby no more than the three parking permits, which exist at present, are retained for use of the amalgamated property. This will ensure that there will be no additional increase to parking stress within the street than exists at present, and no adverse impact on highways management and safety, in accordance with the Council’s policies and guidance.

As such, we respectfully request that the Council remove the suggested requirement for the property to be car capped and allow for the retention of three existing on-street car parking spaces.