



PAUL MEW ASSOCIATES
TRAFFIC CONSULTANTS LTD

TECHNICAL NOTE

Author:	Emily Scott-Holt
Date:	18/08/2016
Project:	PI364: 45 Maresfield Gardens, Camden, London, NW3 5TE Application Number: 2016/2827/P
Subject:	Response to the Council's Delegated Report and Decision Notice

1. Paul Mew Associates have been instructed by Shai Greenberg, on behalf of Mr Chervinski, in relation to the ongoing planning application at 45 Maresfield Gardens, Camden, London, NW3 5TE.
2. The proposed development at 45 Maresfield Gardens consists of the revision of the forecourt parking layout and the alteration of one on-street permit holder parking bay to extend the existing crossover. The planning application reference is 2016/2827/P.
3. This Technical Note has been prepared in response to the Delegated Report and Decision Notice issued by Camden Council, which recommends the proposed development for refusal based on Highways related grounds.
4. A summary of the reasons for refusal presented by Camden in their Decision Notice is listed below for ease of reference. Further justification explaining why these recommendations have been made are presented in Camden's Delegated Report.
 - i. *"The proposed gates and gate piers on the front boundary form an arrangement which is considered to be detrimental to highway safety by virtue of inadequate sightlines for vehicles leaving the site, contrary to the London Borough of Camden Local Development Framework Core Strategy 2010 policies CS5 (Managing the impact of growth and development), CS14 (Promoting high quality places and*

conserving our heritage), and the London Borough of Camden Local Development Framework Development 2010 Policy DP19 (Managing the impact of parking) and DP21 (Development connecting to the highway network).

- ii. *The proposed gates and gate piers on the front boundary form an arrangement which when in use results in the loss of part of an on-street residential parking bay, contributing unacceptably to parking stress in the surrounding area, contrary to the London Borough of Camden Local Development Framework Core Strategy 2010 policies CS5 (Managing the impact of growth and development), CS14 (Promoting high quality places and conserving our heritage), and the London Borough of Camden Local Development Framework Development 2010 Policy DP19 (Managing the impact of parking) and DP21 (Development connecting to the highway network)."*
5. Please find below PMA's responses to Camden's comments, with specific reference made to the Delegated Report, which provides justification as to why the recommendation for refusal was provided.
 6. This document should be read in conjunction with a previous Rebuttal Note, prepared by ourselves, Paul Mew Associates, in December 2015 addressing the concerns and objections raised by local residents to the proposed development. A copy of the December 2015 Rebuttal Note is presented in Appendix A of this report for ease of reference.

PMA's RESPONSES

"The proposed gates and gate piers on the front boundary form an arrangement which is considered to be detrimental to highway safety by virtue of inadequate sightlines for vehicles leaving the site..."

7. As discussed in the previous Rebuttal Note, Camden do not prescribe their own vehicle to pedestrian sightline requirements, nor has it been communicated what they would accept as 'adequate' vehicle to pedestrian sightlines. Therefore it has been necessary to refer to national sightline standards, specifically the standards prescribed in Manual for Streets (MfS).

8. Camden in their Delegated Report have stated that MfS Sightline requirements are primarily for junction layouts rather than crossovers and therefore not specifically applicable to crossovers / private driveways which are the subject of this application.
9. The specific extract of MfS which refers to vehicle to pedestrian visibility is extracted below for ease of reference:

“Visibility along the street edge

Vehicle exits at the back edge of the footway mean that emerging drivers will have to take account of people on the footway. The absence of wide visibility splays at private driveways will encourage drivers to emerge more cautiously. Consideration should be given to whether this will be appropriate, taking into account the following:

- 1. the frequency of vehicle movements;*
- 2. the amount of pedestrian activity; and*
- 3. the width of the footway.”*

10. This section of text is presented in Chapter 7: Street Geometry of MfS and refers to the whole design of streets, rather than just how to connect streets. When examining the wording of the text it refers to the ‘*edge of the footway*’ which indicates that a vehicle will need to pass over the footway, otherwise vehicles would not need to take account of pedestrians. The text goes on to say “*the absence of wide visibility splays at private driveways will encourage drivers to emerge more cautiously*”. It seems unreasonable, therefore, not to apply these standards to the proposed development, as the standards do reference ‘private driveways’, and the crossing of a footway which pedestrians will be traveling along; all of which are applicable to the proposed development.
11. Comments have been raised by Camden stating that it cannot be assumed pedestrians will use the middle of the footpath to complete their journey, when pedestrians are free to use the whole of the footpath. Camden then go on to suggest that parents (with children) or dog walker, will place themselves on the outside of the pavement to act as a barrier between the carriageway and their child / dog.

12. If this is the case then by virtue of the fact that parents / dog owners are walking closer to the kerb, their visibility will be enhanced to emerging vehicles, thereby increasing the safety of pedestrians on Maresfield Gardens.
13. Camden have also noted that children are less predictable in terms of their journeys along the footpath, as they have a tendency to run ahead of their parents and could be on scooters, therefore travelling faster and ahead of their parents. It should be stressed that the application is for one crossover, and the number of vehicle trips associated with one crossover is low (estimated to be one vehicle trip out and one vehicle trip into the forecourt parking opportunity on a typical weekday). It is, therefore, unlikely that a vehicle will be exiting the crossover when children and parents arrive/ depart local schools.
14. If the vehicle using the forecourt parking opportunity is being used for commuting, it is likely the vehicle will leave before 0815-0830 when pupils will be arriving to school, and 1515-1530 when pupils will be departing school. The proposed forecourt layout therefore does not present a significant safety concern to / for pedestrians.
15. As part of the proposed forecourt arrangement a 'central nib' will be located between two crossovers to create a pedestrian refuge between the existing and new crossover. Camden have intimated that the addition of this nib would likely lead to an increased level of maintenance cost for the Council, as vehicles will run over this nib and cause damage to the kerb / pavement.
16. The design and location of this nib is in keeping with existing nibs already on Maresfield Gardens, and therefore is considered to be appropriate.
17. The design of the nib has also been designed with large rounded corners to prevent vehicles overrunning the nib and causing damage when entering and exiting the forecourt parking opportunities.
18. Camden in April 2016, upon the client's request, proposed two alternative forecourt layouts to accommodate two vehicles parking without the need to extend the site's crossover. Both proposals involved the removal of the front gates and piers to create two open parking opportunities starting from the site's southern boundary.

19. It would appear contradictory of the Council to approve their suggested layouts, when their layouts would create reduced vehicle to pedestrian sightlines for vehicles emerging the southern parking opportunity, similar to the 'inadequate' vehicle to pedestrian sightlines for the client's proposed forecourt layout with northern parking opportunity.

20. These arguments are made in connection with the arguments already presented in the submitted Rebuttal Note dated December 2015 (refer to Appendix A); which concluded *"the forecourt layout does not harm highway safety or hinder pedestrians due to the low frequency of vehicles using the forecourt on a daily basis, the low frequency of pedestrian movements, and the sufficiently wide width of the footway"* for the following reasons:

- The footpath adjacent to 45 Maresfield Gardens is sufficiently wide (2.76 metres); allowing pedestrians to travel away from the properties boundary edge where their visibility is reduced;
- The results of the pedestrian count survey demonstrates a total of 226 pedestrian movements on Maresfield Gardens, traveling both north and southbound on both footways on Maresfield Gardens;
- The peak pedestrian flow directly outside 45 Maresfield Gardens occurred between 0830-0835 with a total of 21 pedestrian movements (travelling both north and southbound on both sides of Maresfield Gardens) within a five minute interval;
- At the peak pedestrian flow (0830-0835), an average of four pedestrians a minute walked past the application site on both footpaths; equating to a pedestrian density of 0.15 P/m²/minute. Taking into consideration MfS, a pedestrian density of 0.15 P/m²/minute is considered to be low pedestrian density, with an associated low number of pedestrian movements.

21. The front boundary arrangement is therefore deemed to be acceptable with the provision of 'adequate' vehicle to pedestrian sightlines in accordance with MfS due to the low frequency of vehicle movements associated with the single forecourt parking opportunity, the low flow of pedestrian movements along Maresfield Gardens, and the sufficiently wide width of the footway.

“The proposed gates and gate piers on the front boundary form an arrangement which when in use results in the loss of part of an on-street residential parking bay, contributing unacceptably to parking stress in the surrounding area...”

22. The Council within its Delegated Report, argues that the proposed forecourt layout with amended parking bay will result in a loss of one on-street parking opportunity which is unacceptable for the following reasons:

- In this particular circumstance, Camden Council do not support the use of the Lambeth Methodology, but accepts that it provides a steer for on-street parking considerations;
- Camden Council count a parking opportunity to be 4.8 metres in length, rather than five metres prescribed within the Lambeth Methodology;
- The parking survey only showed a small snapshot, and was undertaken by a consultant commissioned by the applicant;
- It was not clear if the parking survey included Single Yellow Line parking;
- The Council has concerns over the validity of the parking survey when compared to the photos provided by local residents showing the uptake of permit holder parking in the vicinity of the site, and when compared to the number of permits issued within the CPZ;
- There is a lack of other ‘safe’ parking spaces on Maresfield Gardens (lit by streetlights and away from overhanging trees).

23. Paul Mew Associates have in the very recent past conducted parking surveys in Camden in accordance with the commonly accepted industry standard Lambeth Parking Survey Methodology to assess the uptake of parking by local residents overnight (when resident parking demand will be at its highest).

24. It has since come to light through the comments provided by Camden Council that *“in this particular situation”* Camden do not agree with the use of the Lambeth Methodology. This comment is made in particular reference to the measurement of a minimum length of five metres to count as a viable parking opportunity.

25. Presently just to the north of the site is a 19.1 metre length Permit Holder Only (PHO) parking bay, which in accordance with the Lambeth Methodology can accommodate three vehicles. The argument has been presented that the parking bay could be reduced by up to 4.1 metres to accommodate the extended drop kerb to the proposed forecourt parking opportunity, without resulting in a loss an on-street parking opportunity.
26. Camden have since stated that the Lambeth Methodology *"is primarily designed for use in the London Borough of Lambeth, and as such is not directly linked to the London Borough of Camden"*. Camden then go onto state they base their assessment of on-street parking use by common practice, and as such the number of parking opportunities have been rounded up to four, instead of rounding down to three.
27. Camden have judged the number parking opportunities in this parking bay based on photos submitted by, or on the behalf of, local residents objecting to the application showing that four (average to below average sized) vehicles can park in the discussed parking bay, and because the result of the overnight parking surveys do not correlate with the number of parking permits issued.
28. The photo's submitted by, or on the behalf of, local residents only shows the parking uptake in the parking bay that is proposed to be shortened, rather than parking uptake within the whole survey area where residents could justifiably park. The photos are also subjective, showing that four vehicles can park in the parking bay, but not evidencing the feasibility of vehicle egress. The photos are therefore not considered to present typical parking practices.
29. Camden Council state that within CPA CA-B, 117 permits are issued for every 100 parking opportunities within the CPZ. This form of analysis does not take into consideration the number of vehicles that do park in the CPZ regularly rather than vehicles who are registered. It is therefore our professional opinion that the results of the parking survey are more accurate in assessing the uptake of kerb-side parking, which demonstrates that there is spare PHO parking capacity overnight.
30. The parking survey results presented in the submitted Transport Statement (October 2015) were based on a parking opportunity consisting of a 5 metre stretch of kerb-side in accordance with the Lambeth Methodology. Camden have since stated that in Camden the

average vehicle length is considered to be 4.5 metres, and that a 4.8 metre stretch of kerb-side counts as a viable parking opportunity.

31. Camden have only applied this revised methodology to the length of parking bay which the applicant proposed to shorten. However when applied to the whole parking survey area it results in an additional four parking opportunities, revising the average overnight parking stress down by 2% from 72% to 70%. The proposed removal of one parking space (even though it is not one space in accordance with the Lambeth Methodology) will therefore have a lesser impact on the local parking stress with an average of 33 parking spaces available within the survey area overnight.
32. Camden do note that the overnight parking stress is high on Maresfield Gardens and Netherhall Gardens, with an average parking stress above 80%, and that Nutley Terrace which is lightly parked (47%), reduces the overall parking stress. The Lambeth Methodology prescribes a 200 metre or two minute walk as a reasonable distance for a resident to park away from their property. There is therefore no issues (in accordance with the Lambeth Methodology) in including Nutley Terrace within the parking stress calculations.
33. Camden Council do not formally prescribe a parking survey methodology, hence why in the past the Lambeth Methodology has been accepted by Camden and why it was used for this project. It is therefore considered that in the lack of Camden's own parking survey methodology the Lambeth Methodology should be maintained. The proposal will therefore not result in a loss of an on-street parking opportunity.
34. The Council also questions the figures provided within the parking survey results, as to whether the results have included SYL parking, and have intimated that the results provided are skewed, as the parking surveys were undertaken by a consultant commissioned by the applicant.
35. The results presented in the October 2015 Transport Statement did not include SYL parking in the parking stress calculations, as in accordance with the Lambeth Methodology only parking opportunities where residents can legally park for 24 hours should be included. The parking stress results have been revised to include SYL parking. The results, presented in Appendix B, demonstrate that an average of four vehicles park overnight on SYL.

36. Paul Mew Associates would like to confirm to Camden that all the parking surveys were taken in a purely objective manner, and were conducted by one of our surveyors who does not live or have any significant connections within the borough. The surveyor also had no knowledge of the development proposal to ensure the results that we received were a true reflection of the parking uptake overnight.
37. Concerns have also been raised regarding the small quantity of parking surveys undertaken, presenting a 'small snapshot' of parking uptake surrounding the site. The parking surveys were conducted in accordance with the widely perceived industry standard Lambeth methodology. Two overnight surveys were conducted to capture the peak demand for residential parking surrounding the site, as the proposal will have the biggest impact on longer-term residential parking.
38. It is noted by Camden that the forecourt and permit holder layout cannot be accommodated as the layout will not account for any overhang of vehicles parking in the PHO bay. This is not the case, please refer to Figure 1 of this report, which demonstrates the revised parking bay will be 16.1 metres in length, with sufficient space for vehicle overhang the parking bay.
39. It is not considered that the proposed development will result in a crossover being located in a way that may effect on-street parking provision, and the safe movement of vehicles around the site.
40. To help alleviate concerns that the proposal will result in a loss of one on street parking opportunity (however the parking opportunity is measured), the applicant is prepared to fund the conversion of SYL kerb side to PHO parking opportunities within close proximity to the site, to provide a minimum of one replacement on-street parking opportunity for the shortening of the PHO bay adjacent to the site.
41. It is noted that to the north of the site there is a 13.7, 11.4 and 16.4 metre stretch of SYL which could accommodate at least three PHO parking opportunities comfortably, helping to reduce local parking stress. To the south of the site there is also 12.7 metre stretch of SYL which could be converted to PHO parking opportunities. Refer to Figure 2 which shows the locations of these potential PHO parking opportunities.

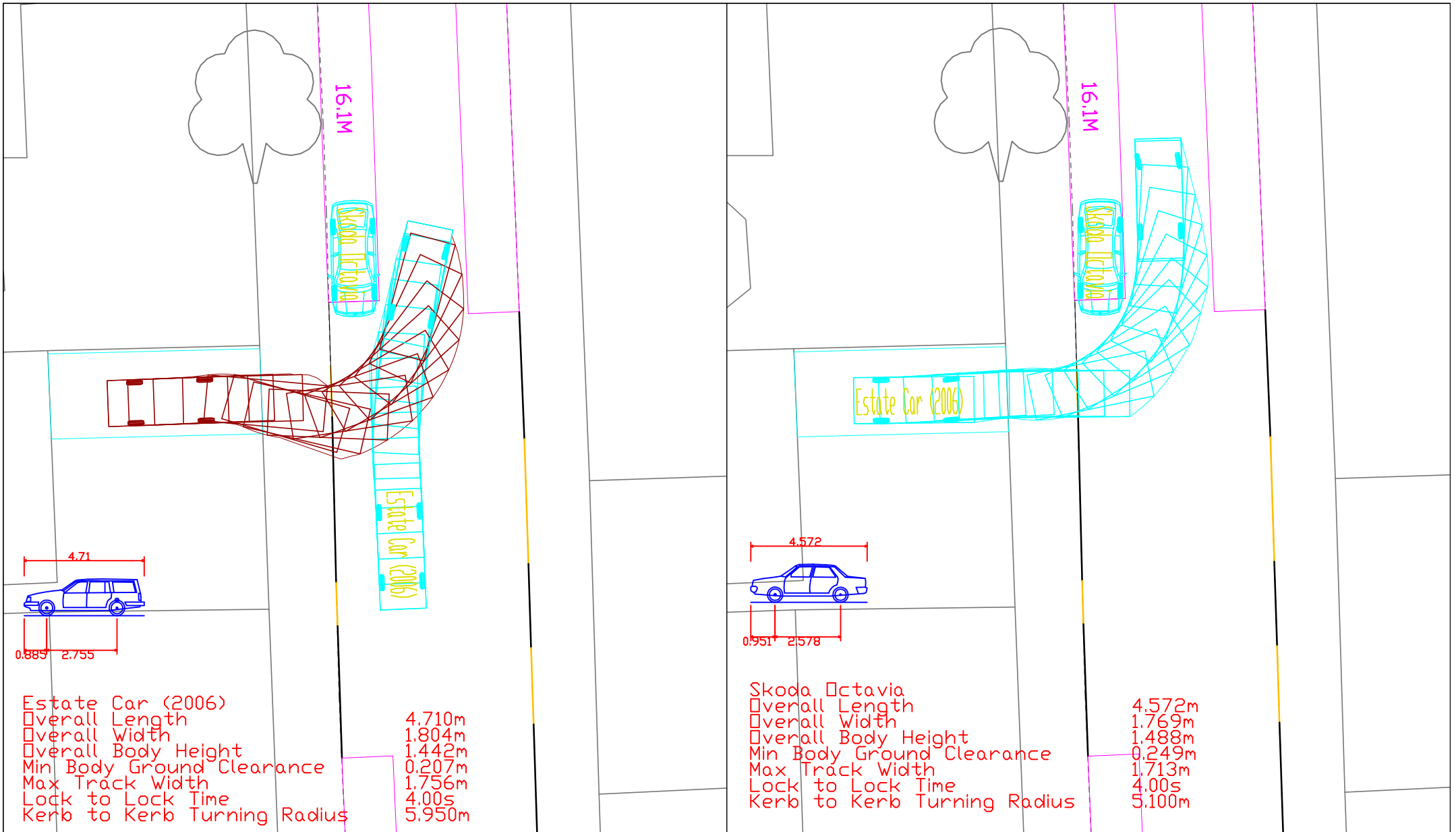
42. Neighbours have raised the issue that in general on Maresfield Gardens there are a lack of well lit (overnight) parking opportunities (helping to prevent robbery / damage to their vehicles) and a lack of parking opportunities that are not under tree's (damage to vehicles from braches / bird droppings).
43. If the conversion of SYL to PHO parking opportunities is approved, there will be more parking spaces for residents not under trees. If the 12.7 metre stretch of SYL to the south of the site was converted to PHO parking opportunities, there would be additional parking opportunities provided near to existing lampposts, providing more well-lit parking opportunities on Maresfield Gardens.
44. Comments have been received from neighbours complaining that Maresfield Gardens and surrounding roads get very congested at peak school drop-off and pick up times with parents parking. Maresfield Gardens and the surrounding roads are located in CPZ CA-B with parking restrictions in place 0900 till 1830 Monday to Friday and 0930 till 1300 Saturday.
45. In the morning peak residents will most likely be at home and parked, and thus will not be in conflict with parents parking in PHO parking spaces.
46. If Maresfield Gardens and surrounding roads become congested in the afternoon due to parents parking in the PHO parking spaces resulting in a lack of parking opportunities for residents, this is due to a lack of enforcement of the CPZ by the Council, and should not negatively affect the applicant.
47. Increasing the number of residents parking on-street during the day could help to reduce the congestion caused by local schools, as there will be less spaces for parents to park (legally or illegally), encouraging the use of more sustainable forms of transport.

SUMMARY

48. The proposed development at 45 Maresfield Gardens is not considered to result in conditions prejudicial to the safe movements of pedestrians along Maresfield Gardens and the provision / availability of PHO parking.

49. The proposed development provides adequate vehicle to pedestrian sightlines in accordance with MfS in the absence of Camden prescribing its own 'adequate' standards.
50. The proposed development, in accordance with the Lambeth Parking Survey Methodology, will not result in the loss of one on-street parking opportunity.
51. To recognise and amend the discrepancy in Camden's approach to measuring parking uptake to this application, the applicant is prepared to fund the provision of at least one additional PHO parking opportunity within the vicinity of the site. The development therefore will not have an effect on the existing parking stress surrounding the site.
52. Regardless of the method used to calculate parking stress, on a typical weekday night there is a minimum of 29 parking spaces available within the survey area, demonstrating there is sufficient spare on-street PHO parking capacity to accommodate the proposed crossover. The proposal is therefore not considered to contribute 'unacceptably' to parking stress.

FIGURES



Date: August 2016
 Scale: 1:200@A4
 Source: OS / PMA
 Drawing No. PI364/TN/01



PI364: 45 Maresfield Gardens, London, NW3 5TE
 Figure 1a.
 Swept Path Analysis: Estate Car



PAUL MEW ASSOCIATES
 TRAFFIC CONSULTANTS
 The Mission Hill, Walkers Place, Putney, London SW15 1PP
 Tel: 0208 780 0426 Fax: 0208 780 0428

Email: paulmew@pma-traffic.co.uk Website: www.pma-traffic.co.uk



Date: August 2016
 Scale: 1:200@A4
 Source: OS / PMA
 Drawing No. PI364/TN/01



PI364: 45 Maresfield Gardens, London, NW3 5TE
 Figure 1b.
 Swept Path Analysis: Estate Car



PAUL MEW ASSOCIATES
 TRAFFIC CONSULTANTS
 The Mission Hill, Walkers Place, Putney, London SW15 1PP
 Tel: 0208 780 0426 Fax: 0208 780 0428

E-mail: paulmew@pma-traffic.co.uk Website: www.pma-traffic.co.uk



Date: August 2016
 Scale: 1:500@A4
 Source: OS / PMA
 Drawing No. PI364/TN/02



PI364: 45 Maresfield Gardens, London, NW3 5TE
 Figure 2.
 Potential PHO Parking Opportunities



PAUL MEW ASSOCIATES
 TRAFFIC CONSULTANTS
 The Mission Hill, Walkers Place, Putney, London SW15 1PP
 Tel: 0208 780 0426 Fax: 0208 780 0428

Email: paulmew@pma-traffic.co.uk Website: www.pma-traffic.co.uk

APPENDIX A

December 2015 Rebuttal Note



PAUL MEW ASSOCIATES
TRAFFIC CONSULTANTS LTD

REBUTTAL NOTE

Author:	Emily Scott - Holt; Paul Mew
Date:	December 2015
Project:	PI364: 45 Maresfield Gardens
Subject:	Rebuttal Note

PROPOSAL

1. The proposal is to maintain the built forecourt parking layout at 45 Maresfield Gardens, which is formed of two forecourt parking opportunities separated by a footpath, a hedge, and gates and gate piers.
2. Concerns have been raised by the Council and neighbours regarding the most northern of the two forecourt parking opportunities as not being in accordance with Development Policy 19 (DPI9): Managing the Impact of Parking of Camden's Core Strategy. DPI9 is extracted below for ease of reference:

"The Council will seek to ensure that the creation of additional car parking spaces will not have negative impacts on parking, highways or the environment, and will encourage the removal of surplus car parking spaces. We will resist development that would:

- a) harm highway safety or hinder pedestrian movement;*
- b) provide inadequate sightlines for vehicles leaving the site;*
- c) add to on-street parking demand where on-street parking spaces cannot meet existing demand, or otherwise harm existing on-street parking conditions;*
- d) require detrimental amendment to existing or proposed Controlled Parking Zones;*
- e) create a shortfall of parking provision in terms of the Council's Parking Standards for bicycles, people with disabilities, service vehicles, coaches and taxis;*
- f) create a shortfall of public car parking, operational business parking or residents' parking;*

g) create, or add to, an area of car parking that has a harmful visual impact.

The Council will require off-street parking to:

h) preserve a building's setting and the character of the surrounding area;

i) preserve any means of enclosure, trees or other features of a forecourt or garden that make a significant contribution to the visual appearance of the area; and

j) provide adequate soft landscaping, permeable surfaces, boundary treatment and other treatments to offset adverse visual impacts and increases in surface run-off.

The Council will only permit public off-street parking where it is supported by a transport assessment and is shown to meet a need that cannot be met by public transport. The Council will expect new public off-street parking to be subject to a legal agreement to control the layout of the parking spaces, the nature of the users and the pricing structure. We will also seek a legal agreement to secure removal of parking spaces in response to any improvement to public transport capacity in the area.

Where parking is created or reallocated, Camden will encourage the allocation of spaces for low emission vehicles, car clubs, pool cars, cycle hire and parking, and electric vehicle charging equipment."

RESPONSES TO PROPOSAL

3. This rebuttal note has been prepared to provide further justification for the discussed forecourt parking layout. A summary of the concerns which have been raised by the Council, neighbours, and Motion Traffic Consultants (acting on the behalf of 45 Maresfield Gardens Limited), are presented below for ease of reference:

- The footway adjacent to 45 Maresfield Gardens is not wide (two metres) and carries a high volume of traffic;
- Pedestrian trips on both sides of the road should be considered, as pedestrian journeys can easily be undertaken on the opposite footpath;
- Pedestrian counts only show two snapshots of pedestrian activity, and were undertaken at an inappropriate time therefore are not an accurate representation;

- The forecourt parking layout provides inadequate vehicle to pedestrian sightlines for exiting vehicles, creating a dangerous environment for pedestrians;
- The forecourt parking layout will result in a loss of on-street parking opportunities, exacerbating parking stress in an area where 110 permits are issued for every 100 parking bays, and where it is '*impossible*' for residents to park close to their homes;
- The forecourt layout creates an excessive distance between points of safety for pedestrians on the footpath;
- No parking restrictions have been placed on the residents of the property;
- Vehicles using the parking opportunity are unable to enter from the north, and exit left without crossing to the other side of the road;
- The swept path analysis has not taken into consideration the location of on-street parking bays;
- Exiting vehicles will cause damage to the manhole cover;
- The previous layout of the forecourt parking opportunities accommodates two vehicles parking off-street without compromising pedestrian safety;

PMA RESPONSES

"The footway adjacent to 45 Maresfield Gardens is not wide (two metres) and carries a high volume of traffic."

"Pedestrian trips on both sides of the road should be considered, as pedestrian journeys can easily be undertaken on the opposite footpath."

"Pedestrian counts only show two snapshots of pedestrian activity, and were undertaken at an inappropriate time therefore are not an accurate representation"

4. The footpath directly adjacent to the property is 2.76 metres wide which is considered to be a wide footpath. MfS states that "*the minimum unobstructed width for pedestrians should generally be 2 metres*" for lightly used streets, however footpaths can be narrower or wider, with no prescribed maximum standards.
5. MfS recognises the minimum width of footway required for a person with a push chair and another person walking to the side is 1.5 metres, and the minimum width of a

footway for a person and a child walking side by side is 1.2 metres. In accordance with MfS minimum footway standards, the footway on Maresfield Gardens can accommodate multiple pedestrians walking side by side along the street; and is therefore considered to be a sufficiently wide footpath.

6. Detailed pedestrian surveys were undertaken on Thursday 24th September 2015, during normal school term time, between the hours of 0730-0930 and 1430-1630, thus capturing the peak period of pedestrian activity along Maresfield Gardens, particularly in terms of more vulnerable pedestrians (children arriving / departing school). Therefore the pedestrian surveys are considered to be an accurate representation of the pedestrian usage of Maresfield Gardens.

7. The results of the pedestrian surveys are presented in Table 1 and 2 below:

Table 1: Maresfield Gardens Pedestrian Traffic Volume Morning Survey Results

Time	Maresfield Gardens				
	Number of Pedestrians				
	East Side		West Side		TOTAL
	Northbound	Southbound	Northbound	Southbound	
0730-0735	1	1	0	0	2
0735-0740	0	0	1	0	1
0740-0745	0	0	1	1	2
0745-0750	0	0	0	1	1
0750-0755	0	2	3	2	7
0755-0800	1	4	3	6	14
0800-0805	1	3	2	3	9
0805-0810	3	5	5	3	16
0810-0815	0	2	3	1	6
0815-0820	1	7	9	1	18
0820-0825	4	2	6	6	18
0825-0830	0	1	4	15	20
0830-0835	5	4	6	6	21
0835-0840	1	0	6	4	11
0840-0845	0	1	3	7	11
0845-0850	2	6	4	0	12
0850-0855	2	6	4	1	13
0855-0900	0	0	1	1	2
0900-0905	2	2	2	3	9
0905-0910	1	3	2	3	9
0910-0915	2	0	2	5	9
0915-0920	2	1	1	2	6
0920-0925	1	0	0	3	4
0925-0930	1	2	1	1	5
TOTAL	30	52	69	75	226

Source: PMA Survey

Note: East Side = Opposite footpath to the site, West Side = Adjacent footpath to the site.

- The results of Table 1 demonstrate that there are a total of 226 pedestrian movements on a typical weekday morning travelling northbound and southbound on both footpaths on Maresfield Gardens.

Table 2: Maresfield Gardens Pedestrian Traffic Volume Afternoon Survey Results

Time	Maresfield Gardens				
	Number of Pedestrians				
	East Side		West Side		TOTAL
	Northbound	Southbound	Northbound	Southbound	
1430-1435	0	0	1	1	2
1435-1440	1	0	3	1	5
1440-1445	1	2	2	0	5
1445-1450	1	2	1	0	4
1450-1455	1	2	1	1	5
1455-1500	0	0	0	1	1
1500-1505	0	1	1	1	3
1505-1510	1	1	3	2	7
1510-1515	1	2	4	0	7
1515-1520	1	3	9	2	15
1520-1525	0	0	4	3	7
1525-1530	4	2	3	1	10
1530-1535	3	3	3	0	9
1535-1540	3	0	10	2	15
1540-1545	0	2	10	1	13
1545-1550	0	2	6	0	8
1550-1555	5	2	6	1	14
1555-1600	1	0	3	0	4
1600-1605	0	3	1	0	4
1605-1610	1	2	3	3	9
1610-1615	1	2	1	4	8
1615-1620	3	4	6	1	14
1620-1625	0	1	5	1	7
1625-1630	1	2	2	3	8
TOTAL	29	38	88	29	184

Source: PMA Survey

9. The results in Table 2 demonstrate that there are a total of 184 pedestrian movements on a typical weekday afternoon, travelling northbound and southbound on both footpaths on Maresfield Gardens.

10. The footpath directly adjacent to the application site is 2.76 metres wide and 10.35 metres in length; therefore the total area of the footpath in front of the application site is 28.5m². The peak pedestrian flow outside of 45 Maresfield Gardens occurred between 0830-0835 with a total of 21 pedestrian movements within a five minute interval travelling on both footpaths on Maresfield Gardens. The pedestrian flow on Maresfield Gardens at all other times of the day were lower.

11. A footpath of 2.76 metres wide is a sufficiently wide footpath to allow pedestrians not to travel directly adjacent to properties boundaries on Maresfield Gardens, where their visibility is reduced.

12. At the peak pedestrian flow (0830-0835), an average of four pedestrians a minute walked past the application site on both footpaths; equating to a pedestrian density of 0.15 P/m²/minute. Taking into consideration MfS (see below), a pedestrian density of 0.15 P/m²/minute is considered to be low pedestrian density, with an associated low number of pedestrian movements.

Diagram of Pedestrian Density (MfS)

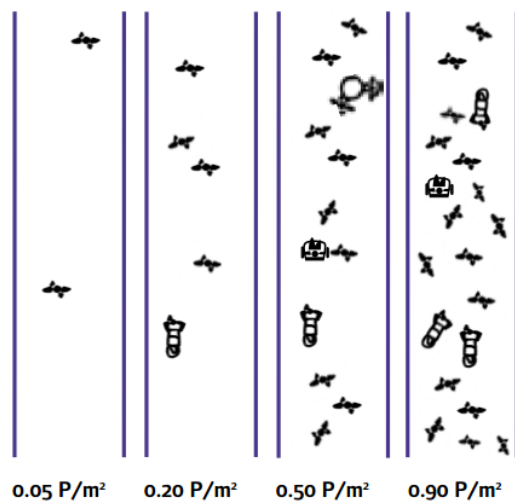


Figure 6.9 Diagram showing different densities of use in terms of pedestrians per square metre. Derived from *Vorrang für Fussgänger*⁹.

13. The number of pedestrians using both footpaths on Maresfield Gardens has been used to calculate the pedestrian density adjacent to 45 Maresfield Gardens, as suggested by the Council. Therefore this is a worst case scenario assessment as in practice (and as observed in Table 2) not all pedestrians will use the western footpath of Maresfield Gardens to complete their journey.

“The forecourt parking layout provides inadequate vehicle to pedestrian sightlines for exiting vehicles, creating a dangerous environment for pedestrians.”

14. Camden Council does not prescribe a required visibility envelope for vehicles to pedestrian sightlines, but refer to Manual for Streets (MfS), which states:

“Visibility along the street edge

Vehicle exits at the back edge of the footway mean that emerging drivers will have to take account of people on the footway. The absence of wide visibility splays at private driveways will encourage drivers to emerge more cautiously. Consideration should be given to whether this will be appropriate, taking into account the following:

- 1. the frequency of vehicle movements;*
- 2. the amount of pedestrian activity; and*
- 3. the width of the footway.”*

15. As discussed in the Transport Statement, the forecourt parking opportunity is expected to generate a total of one two-way vehicle movement (a vehicle exiting and entering the forecourt parking opportunity) over the course of a typical weekday.

16. Therefore the current provision of vehicle to pedestrian sightlines is considered to be appropriate, and not inadequate, given the low frequency of vehicles accessing and egressing the forecourt parking opportunity, the sufficiently wide width of the footway (2.67 metres), and the low frequency of pedestrians travelling past the application site.

17. Furthermore the reduced visibility of vehicles exiting the site “*will encourage drivers to emerge more cautiously*” (MfS), increasing the safety of pedestrians.

18. The forecourt parking layout is therefore considered to be in accordance with Camden's DPI9, as the site is providing sufficient sightlines for emerging vehicles, and is not hindering highway safety or pedestrian movements.

“The forecourt parking layout will result in a loss of on-street parking opportunities, exacerbating parking stress in an area where 110 permits are issued for every 100 parking bays, and where it is ‘impossible’ for residents to park close to their homes.”

19. It is a common practice that London Borough Councils issue more parking permits than there are spaces to park. The test Boroughs rely on to assess the uptake of parking in an

area is a 'parking stress' survey, which is based upon on-street observations of parking practices.

20. A parking stress survey was undertaken in accordance with the Lambeth Methodology (refer to Appendix A), to assess the uptake of parking within a 200 metre walking distance of the site (refer to the Transport Statement).
21. As part of the parking stress survey the length of available kerbside parking opportunities in close proximity to the site were measured on site using a measuring wheel. The Permit Holder Only (PHO) parking bay located adjacent to 45 Maresfield Gardens, which is proposed to be shortened to accommodate a drop kerb to the forecourt parking opportunity, measured 19.1 metres in length.
22. In accordance with the Lambeth Council Parking Survey Guidance (refer to Appendix A), 5 metres constitutes a viable parking opportunity, therefore the 19.1 metre stretch of PHO parking bay can only accommodate a total of three cars. The proposal to shorten the PHO parking bay by a maximum of 4 metres to accommodate a drop kerb will therefore not result in the loss of a parking opportunity.
23. It has been noted that the 19.1 metre stretch of PHO parking 'can' accommodate up to four vehicles, assuming an average vehicle length of 4.5 metres. If / when four vehicles do park in the 19.1 metre stretch of PHO parking bay, assuming that they are all an average size this would leave a total of 1.1 metres between all four parked cars for manoeuvring. Therefore the reduction of 19.1 the PHO parking bay by 4 metres is considered to be an improvement upon current parking practices, as currently there is not enough manoeuvring space to safely accommodate four vehicles parking in the PHO parking bay.
24. The results of the on-street overnight parking stress surveys demonstrated that the PHO parking stress on the roads adjoining the site is 72% (counting the 19.1 metres as three parking opportunities), with an average of 29 PHO parking opportunities available on a typical weekday night. The parking stress survey has demonstrated that there is sufficient reserve parking capacity on the roads adjoining the site to accommodate any displaced parking resulting from the forecourt parking layout, despite "*110 permits being issued for every 100 parking bays*".

25. In accordance with the Lambeth Methodology a 200 metre walk is a reasonable distance to park a vehicle away from your home. The parking stress survey has also demonstrated that it is possible for residents to park within a *reasonable* walking distance of their homes, with an average of 29 PHO parking opportunities available within 200 metres of 45 Maresfield Gardens.

26. As demonstrated by the parking stress survey, the proposal does not require detrimental amendment to the local Controlled Parking Zone (CPZ), and will not result in a shortfall in public (PHO) parking; therefore the forecourt layout is considered to be in accordance with DPI9.

“The forecourt layout creates an excessive distance between points of safety for pedestrians on the footpath.”

27. The forecourt layout will create, with the extension of the drop kerb, a crossover which is approximately 10.5 metres in length.

28. There is already a precedent for large crossovers on Maresfield Gardens, the longest crossover currently measuring 12.0 metres outside 49 Maresfield Gardens. As there is already a precedent for crossovers on Maresfield Gardens, pedestrians are already aware of potentially emerging vehicles from crossovers.

29. As already discussed, the forecourt parking opportunity is expected to generate a total of one two-way vehicle movements over the course of a typical day. The proposed crossover (which accommodates two forecourt parking opportunities) is predicted to generate a total of two two-way vehicle movements over the course of a typical weekday, which is a very low frequency of vehicle movements.

30. The proposed crossover has been designed in two ways, as a large single crossover, and as two smaller crossovers with a central refuge for pedestrians, refer to Appendix B. Both crossovers are considered to be appropriate and in keeping with other crossovers on Maresfield Gardens, however the provision of a pedestrian refuge between two smaller crossovers is a safer design for pedestrians, by providing shelter from vehicles using the crossover.

31. Given the low frequency of vehicle movements across the crossover, and the precedent of long crossovers already on Maresfield Gardens, neither of the crossover designs are considered to create *“an excessive distance between points of safety for pedestrians on the footpath”*.

32. The forecourt layout is therefore considered to be in accordance with DPI9, as the layout will not hinder the movement of pedestrians or create an unsafe environment for pedestrians.

“No parking restrictions have been placed on the residents of the property.”

33. The parking stress survey has demonstrated that there is sufficient reserve parking capacity within 200 metres of Maresfield Gardens, with an average of 29 available PHO parking spaces on a typical weekday night. It is not considered that the development at 45 Maresfield Gardens would harm current on-street parking conditions, as there is sufficient on street parking available for residents not to have parking restrictions placed upon them.

34. A draft legal agreement has been offered, whereby residents of 45 Maresfield Gardens will only be able to apply for two parking permits (rather than three), however this is not considered necessary as there is sufficient capacity on-street to accommodate overspill parking from 45 Maresfield Gardens.

“Vehicles using the parking opportunity are unable to enter from the north, and exit left without crossing to the other side of the road.”

“The swept path analysis has not taken into consideration the location of on-street parking bays.”

35. Swept path analysis has been conducted to demonstrate that a vehicle is able to enter the forecourt parking opportunity when approaching from the north, and exit to the north, without crossing the other side of the road or any PHO parking bays. Refer to Appendix C.

36. A large estate car has been used in the swept path analysis to demonstrate that the manoeuvres are possible with an above average length of vehicle.

“Exiting vehicles will cause damage to the manhole cover.”

37. It is predicted that one-two way vehicle movements will be generated by the forecourt parking layout, meaning on a daily basis there will be a very low frequency of lightweight vehicles passing over the man-hole cover. Depending on the way that vehicles enter and exit the parking opportunity depends on how much of the man-hole-cover is travelled over (if any), however the movement of lightweight vehicles do not damage man-hole covers. It is therefore anticipated that no damaged will be caused to the man-hole-cover by vehicles entering and exiting the forecourt parking opportunity.

“The previous layout of the forecourt parking opportunities accommodates two vehicles parking off-street without compromising pedestrian safety.”

38. The previous forecourt parking layout could accommodate up to three vehicles in a non-policy compliant arrangement, therefore the rationalisation of the forecourt parking layout to provide parking for only two vehicles is considered to be an improvement, and in keeping with the Council's parking expectations.

39. In addition the previous layout was inefficient and caused conflict between the two neighbours in terms of where they parked their vehicles.

40. The layout of the forecourt parking opportunity is not considered to have a harmful visual impact in terms of car parking, and is therefore in accordance with DPI9.

SUMMARY

41. In summary, the forecourt parking layout is considered to be satisfactory, and in accordance with DPI9 as:

- The forecourt layout does not harm highway safety or hinder pedestrians due to the low frequency of vehicles using the forecourt on a daily basis, the low frequency of pedestrian movements, and the sufficiently wide width of the footway.

- Camden does not prescribe a required visibility envelope for emerging vehicles onto the highway; therefore MfS has been referred to which the forecourt parking layout is in accordance with. Therefore sufficient sightlines have been provided.
- As demonstrated by the parking stress survey within the Transport Statement, the forecourt parking does not harm on-street parking condition as there is more than sufficient PHO in the vicinity (200 metres) of the site to cope with any overspill / displaced parking.
- The parking stress survey has also demonstrated the reduction of the 19.1 PHO parking bay by up to 4 metres will not result in a loss of public (PHO) parking opportunities, as in accordance with the Lambeth Methodology only three vehicles can park the 19.1 metre PHO bay, the same as a 15 metre length of PHO parking bay.
- The layout of the forecourt parking opportunity is not considered to have a harmful visual impact in terms of car parking, and therefore in accordance with DPI9.

APPENDIX A
Lambeth Council Parking Survey Guidance Note

LAMBETH COUNCIL PARKING SURVEY GUIDANCE NOTE

1. INTRODUCTION AND POLICY BACKGROUND

Most forms of development have the potential to increase the amount of on-street parking, more commonly known as parking stress. High parking stress can affect highway safety, the free-flow of traffic, amenity, access by emergency services, refuse collection and delivery of goods. Investigation of this impact forms an important part of the Council's analysis of proposed developments and therefore it is essential that enough information is submitted by a developer to allow a full analysis of the issue. An unacceptable increase in parking stress, or the submission of an insufficient level of information, can lead to a recommendation for refusal of a planning application.

Lambeth's policies on parking related to new development are based on the Mayor's London Plan, the Core Strategy and the saved policies of the Council's Unitary Development Plan 2007 (UDP). Developers are particularly advised to read Chapter 6 (London's Transport) of The London Plan, and the policies and standards, particularly Table 6.1 Parking Standards, contained therein. Chapter 6 of The London Plan can be viewed on the GLA's website at the following address:

<http://www.london.gov.uk/shaping-london/london-plan/strategy/chapter6.jsp>

Developers are also advised to read Criteria (f) of Core Strategy Policy S4, and the saved elements of UDP policies 14 and 17, although policy 39 may also be relevant. The Core Strategy and the saved policies of the UDP can be viewed on the Council's website at the following address:

<http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/PlanningPolicy/LDFCoreStrategy.htm>

Ordinarily the Planning Department will not validate a residential planning application without a parking survey. In some cases parking surveys are required for commercial developments as well, depending on the scale and nature of the development. Submitting a survey enables the Council to make an informed decision, within statutory planning timescales, and benefits applicants in obtaining a quick decision.

A developer can propose on-site parking bays up to the maximum stated in Table 6.1 of the London Plan but in areas of high PTAL and within a CPZ a car free development (and permit exempt) would be expected unless acceptable justification is provided. However, even where on-site parking is proposed this may not accommodate all cars generated by a development, so a parking survey may still be required. An assessment of likely car ownership of future occupants can then be undertaken to understand the scale of any overspill parking. The cumulative effect of other consented development in the immediate area will also need to be taken into account when assessing the effect of parking on street.

Advice on whether a survey is required can be obtained from the Council's Transport Planning team by emailing transportplanning@lambeth.gov.uk with details of the proposed development. If a survey is not required a written response will be provided confirming this and should be submitted with the planning application.

Lambeth Council
Transport Planning & Strategy
1st Floor Blue Star House
234-244 Stockwell Road
London SW9 9SP

Telephone: 020 7926 9000
Fax: 020 7926 9001
Email: transportplanning@lambeth.gov.uk
www.lambeth.gov.uk

2. UNDERTAKING A SURVEY

The following guidelines should be followed when undertaking a survey. If these guidelines are not followed the Council may not be able to make a full and proper assessment of the proposal.

Residential Developments

The Council requires a parking survey to cover the area where residents of a proposed development may want to park. This generally covers an area of 200m (or a 2 minute walk) around a site. For further detail see 'Extent of survey' below.

The survey should be undertaken when the highest number of residents are at home; generally late at night during the week. A snapshot survey between the hours of 0030-0530 should be undertaken on two separate weekday nights (ie. Monday, Tuesday, Wednesday or Thursday).

Commercial Developments

Surveys for commercial developments should cover an area within 500m walking distance (or a 5 minute walk) of a site. For further detail, see 'Extent of survey' below. Surveys should generally be done during proposed opening hours on an hourly beat basis.

Excluding the extent and time of the surveys the same principles apply as a survey for a residential development as set out below, but developers should contact the Council for further advice.

Survey times

For sites close to any of the following land uses, additional survey times may be necessary:

- Town centre locations: surveys should be undertaken Monday-Wednesday only.
- Regular specific evening uses close to the site (eg. church, etc): additional surveys should be undertaken when these uses are in operation.
- Commercial uses close to the site: morning and early evening surveys may also be required due to conflict with commuter parking. In these cases surveys between the hours of 0700-0830 and 1800-1900 may be required, noting the amount of parking on a 15-minute basis over this time.
- Railway stations/areas of commuter parking: additional morning and evening peak hour surveys will be required in order to assess the impact of commuter parking. These should be done between 0700-0800 and 1730-1830.

Surveys ***should not*** be undertaken:

- in weeks that include Public Holidays and school holidays and it is advised that weeks preceding and following holidays should also be avoided;
- on or close to a date when a local event is taking place locally since this may impact the results of the survey.

In some cases, the hours of the survey may need to be extended or amended. Applicants should contact the Council prior to undertaking a survey if there is any doubt.

Lambeth Council
Transport Planning & Strategy
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Fax: 020 7926 9001
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www.lambeth.gov.uk

Extent of survey

All roads within 200 metres (or 500m for commercial uses) walking distance of the site. Note this area is **NOT** a circle with a 200/500m radius but a 200/500m walking distance as measured along all roads up to a point 200/500m from the site.

Since people are unlikely to stop half way along a road at an imaginary 200/500m line so the survey should be extended to the next junction or shortened to the previous one, or taken to a suitable location along a road.

The following areas should be *excluded* from surveys:

- If the site is in a CPZ any parking bays in an adjoining CPZ should be excluded.
- If the site lies adjacent to, but not in, a CPZ then all roads in that CPZ should be excluded.
- Areas that fall outside of Lambeth should be excluded.
- Places where drivers are unlikely to want to park, for example:
 - If there is no possibility of parking somewhere within the 200m boundary
 - If drivers would not wish to park in an area, due to perceived safety issues, or difficulty in accessing the parking for example.

Common sense should be applied in all cases and the extent of the survey area and justification for any amendments should be included in the survey. If inadequate justification is provided for a survey area then amendments may be required or a recommendation made accordingly.

Required Information

The following information should be included in the survey results, to be submitted to the Council:

- The date and time of the survey.
- A description of the area noting any significant land uses in the vicinity of the site that may affect parking within the survey area (eg. churches, restaurants, bars and clubs, train stations, hospitals, large offices, town centres etc).
- Any unusual observations, e.g. suspended parking bays, spaces out of use because of road works or presence of skips, etc.
- A drawing (preferably scaled at 1:1250) showing the site location and extent of the survey area. All other parking and waiting restrictions such as Double Yellow Lines and Double Red Lines, bus lay-bys, kerb build-outs, and crossovers (vehicular accesses) etc should also be shown on the plan.
- The number of cars parked on each road within the survey area on each night should be counted and recorded in a table as shown below. It would be helpful to note the approximate location of each car on the plan (marked with an X).
- Photographs of the parking conditions in the survey area can be provided to back-up the results. If submitted, the location of each photograph should be clearly marked.

Areas Within A Controlled Parking Zone (CPZ)

Only Resident Permit Holder (RPH) Bays and Shared Bays which allow residents parking (these may be shared with Pay-and-Display parking and/or Business Permit Holders) should be counted.

To calculate parking capacity each length of parking bay must be measured and then converted into parking spaces by dividing the length by 5 (each vehicle is assumed to measure 5m) and rounding down to the nearest whole number. For example a parking bay measuring 47m in length would provide 9 parking bays ($47/5=9.4=9$). The capacity of each separate parking bay must be calculated separately and then added together to give a total number of parking spaces for each road in the survey area.

The results should generally be presented in the following format (figures given as an example):

Street Name	Total Length (m) of parking spaces	No. of RPH parking spaces	No. of cars parked in RPH bays	RPH Parking Stress (%)
A Street	350	70	70	100
B Street	250	50	40	80
C Street	150	30	10	33
Total	750	150	120	80

A separate note should be made of any areas where cars can legally park overnight. These are generally Single Yellow Lines or Single Red Lines (SYL/SRL) or short term parking or Pay-and-Display bays (ST). The number of cars parked in these areas should be counted and presented separately.

Areas Not In A Controlled Parking Zone (CPZ)

All areas of unrestricted parking should be counted. To calculate parking capacity each length of road between obstructions (such as crossovers, kerb build-outs, yellow lines, etc) must be measured and then converted into parking spaces by dividing the length by 5 and rounding down to the nearest whole number. For example a length of road measuring 47m in length would provide 9 parking bays ($47/5=9.4=9$). The capacity of each section of road must be calculated separately and then added together to give a total number of parking spaces for each road in the survey area.

The distance between crossovers should be measured in units of 5m. For example, if the distance between 2 crossovers or a crossover and a junction is 12m then only 10m should be counted in the survey, and any space between crossovers measuring less than 5m should be discounted from the calculation. For reasons of highway safety, the first 5m from a junction should also be omitted from the calculation.

A map or plan showing the measurements used in calculating parking capacity should be supplied so that this can be verified by the Council. The parking survey may not be accepted if this is not supplied.

The results should generally be presented in the following format (figures given as an example):

Street Name	Total Length (m) of kerb space	Length of unrestricted parking (m)	No. of parking spaces	No. of cars parked on unrestricted length of road	Unrestricted Parking Stress (%)
A Street	400	350	70	70	100
B Street	300	250	50	40	80
C Street	200	150	30	10	33
Total	900	750	150	120	80

UNDERSTANDING THE RESULTS

The results of the parking survey will be analysed by the Council in accordance with the London Plan and saved policies in the Council's UDP, any Supplementary Planning Documents produced by the Council in relation to parking, and any other Transport policy guidance produced by the Council, Transport for London, or nationally.

The Council will also take into consideration the impact of any recently permitted schemes in determining the acceptability or not of each proposed development.

Note that stress levels of over 100% stress (or 100% occupancy level) are possible. This is because small cars may need less space than 5 metres to park, meaning that additional cars can be accommodated.

FURTHER ASSISTANCE

For further assistance or explanation please contact the Council's Transport Planning and Strategy team at the address below

Spanish

Si desea esta información en otro idioma, rogamos nos llame al 020 7926 2618.

Portuguese

Se desejar esta informação noutra idioma é favor telefonar para 020 7926 2618.

Yoruba

Tí ẹ ba ẹ imoràn yí, ní èdè Òmíràn, ẹjọ, ẹ kàn wà l'ágogo 020 7926 2618.

French

Si vous souhaitez ces informations dans une autre langue veuillez nous contacter au 020 7926 2618.

Bengali

এই তথ্য অন্য কোনো ভাষায় আপনার প্রয়োজন হলে অনুগ্রহ করে ফোন করুন 020 7926 2618.

Twi

Se wope saa nkaeboy yi wo kasa foforo mu a fre 020 7926 2618.

Lambeth Council

Transport Planning & Strategy

1st Floor Blue Star House
234-244 Stockwell Road
London SW9 9SP

Telephone: 020 7926 9000

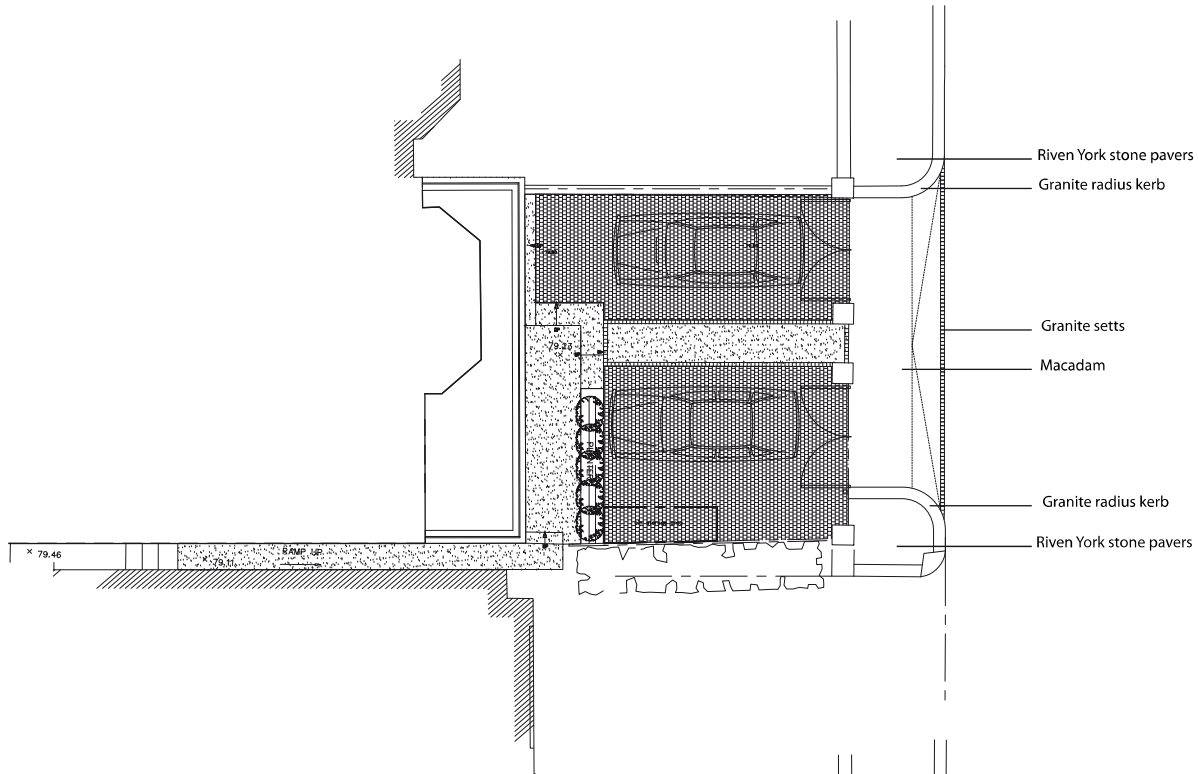
Fax: 020 7926 9001

Email: transportplanning@lambeth.gov.uk
www.lambeth.gov.uk

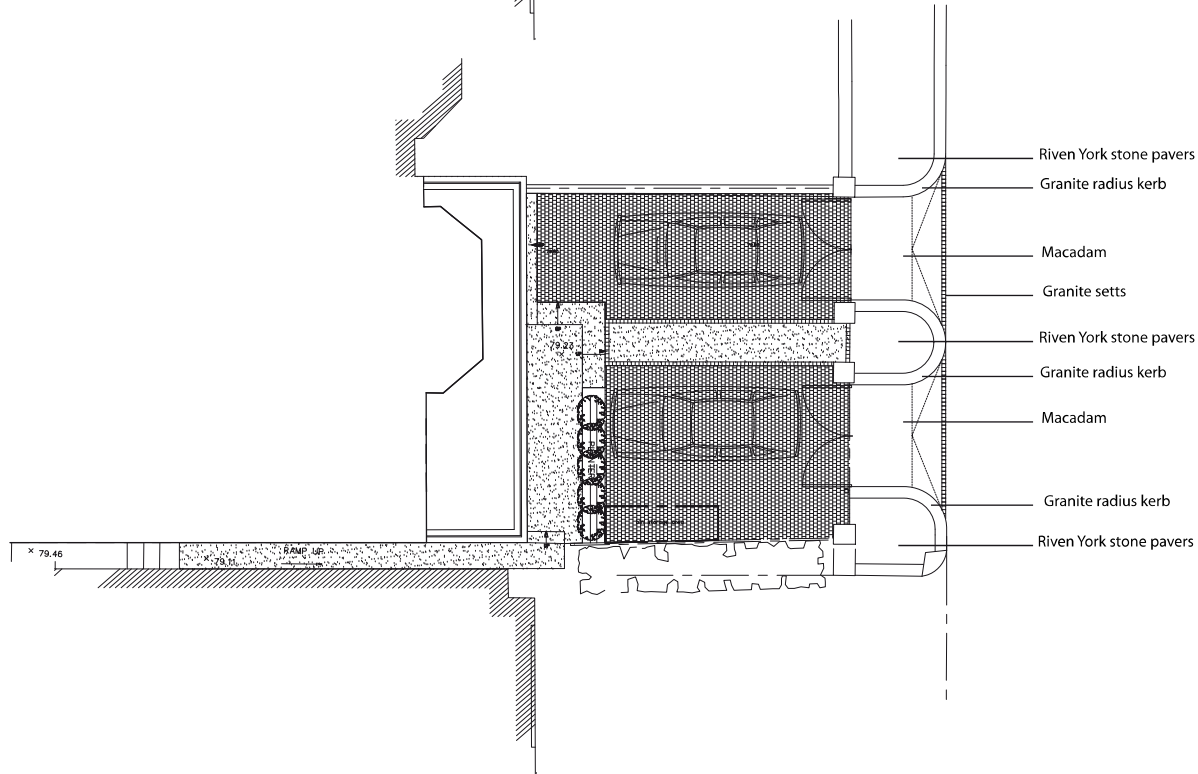
APPENDIX B

Proposed Crossover Layouts

Option One



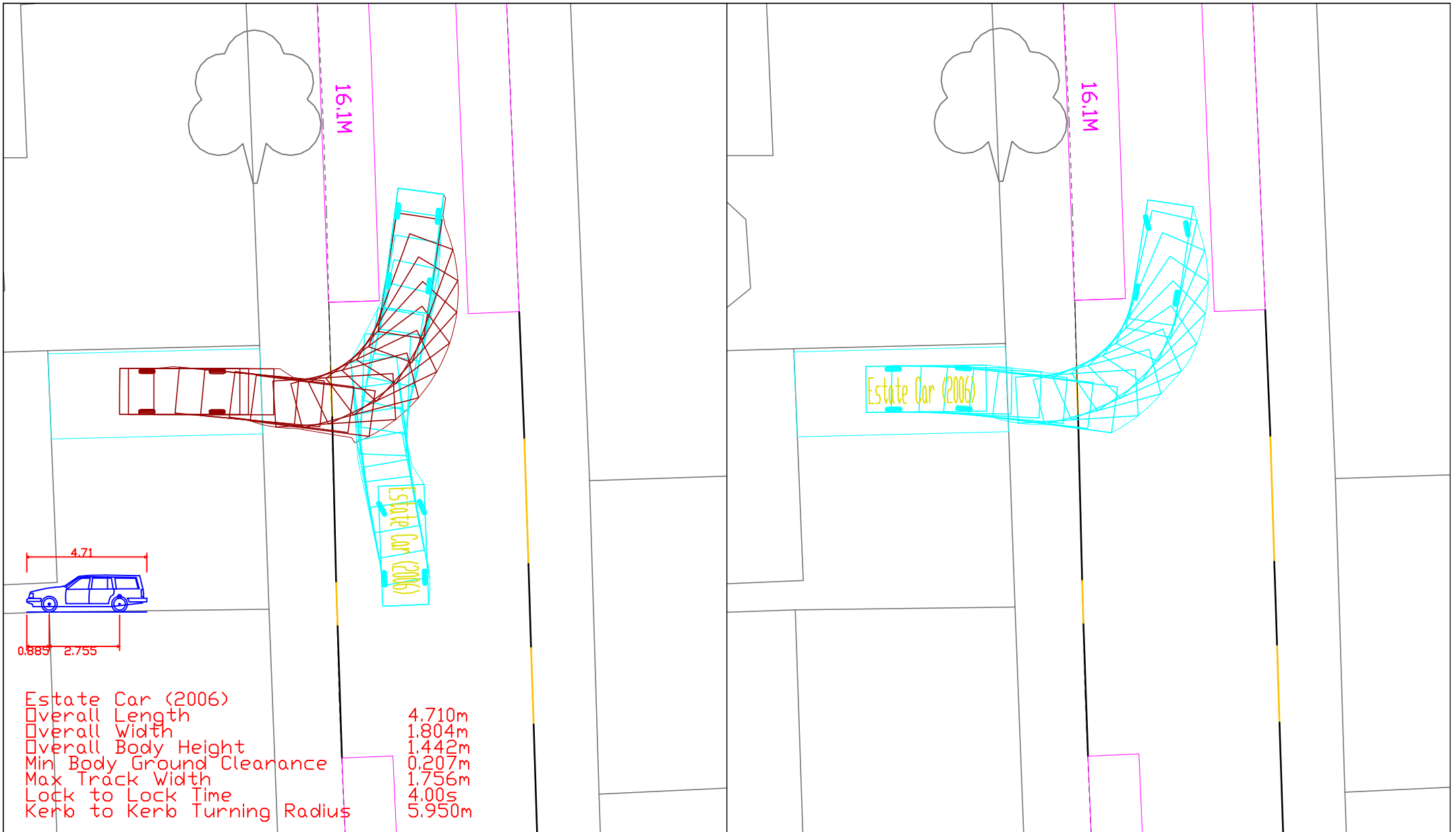
Option Two



Proposed Crossover Layout Options 45 Maresfield Gardens Enforcement Appeal

APPENDIX C

Swept Path Analysis



Date: December 2015
 Scale: 1:200@A4
 Source: OS / PMA
 Drawing No. PI364/RN/0C

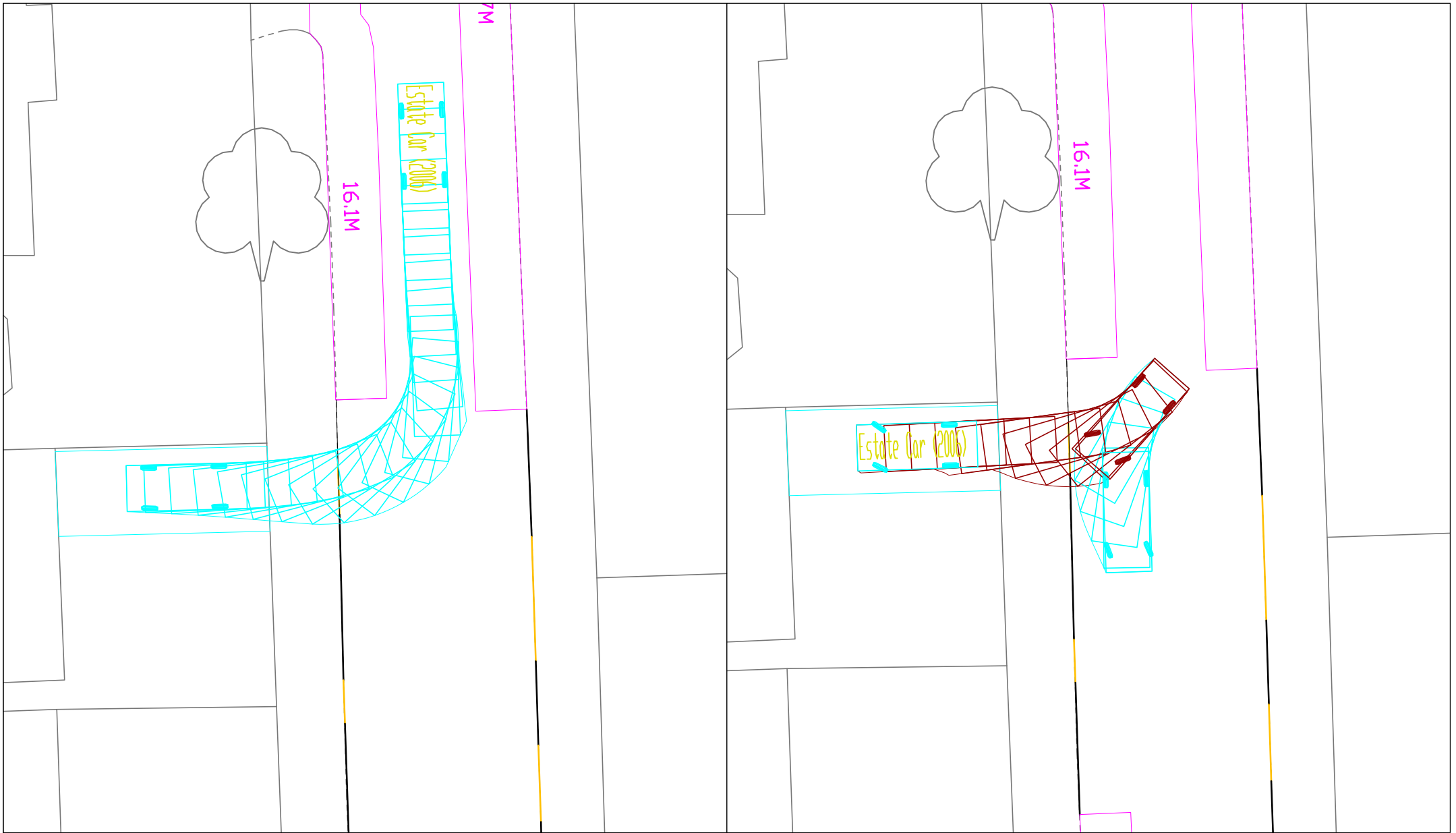


PI364: 45 Maresfield Gardens, London, NW3 5TE
 Appendix C.
 Swept Path Analysis: Estate Car



PAUL MEW ASSOCIATES
 TRAFFIC CONSULTANTS
 The Mission Hill, Walkers Place, Putney, London SW15 1PP
 Tel: 0208 780 0426 Fax: 0208 780 0428

Email: paulmew@pma-traffic.co.uk Website: www.pma-traffic.co.uk



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PAUL MEW ASSOCIATES
 TRAFFIC CONSULTANTS
 The Mission Hill, Walkers Place, Putney, London SW15 1PP
 Tel: 0208 780 0426 Fax: 0208 780 0428

E-mail: paulmew@pma-traffic.co.uk Website: www.pma-traffic.co.uk

APPENDIX B

Parking Survey Results

PI 364: 45 MARESFIELD GARDENS, LONDON, NW3 5TE

Overnight Parking Survey 1: Wednesday 23rd September 2015 at 0030

Road	PHO			P&D			SYL		
	Spaces	Number of Cars Parked	Parking Stress	Spaces	Number of Cars Parked	Parking Stress	Spaces	Number of Cars Parked	Parking Stress
Maresfield Gardens	61	49	80%	9	0	0%	23	2	9%
Netherhall Gardens	15	12	80%	-	-	-	2	0	0%
Nutley Terrace	29	12	41%	12	0	0%	10	0	0%
Total	105	73	70%	21	0	0%	35	2	6%

Source: PMA Survey

Note: Some Arithmetic errors due to rounding's

Overnight Parking Survey 2: Thursday 24th September 2015 at 0030

Road	PHO			P&D			SYL		
	Spaces	Number of Cars Parked	Parking Stress	Spaces	Number of Cars Parked	Parking Stress	Spaces	Number of Cars Parked	Parking Stress
Maresfield Gardens	61	51	84%	9	0	0%	23	5	22%
Netherhall Gardens	15	13	87%	-	-	-	2	1	50%
Nutley Terrace	29	15	52%	12	0	0%	10	0	0%
Total	105	79	75%	21	0	0%	35	6	17%

Source: PMA Survey

Note: Some Arithmetic errors due to rounding's

Average Overnight Parking Stress

Road	PHO			P&D			SYL		
	Spaces	Number of Cars Parked	Parking Stress	Spaces	Number of Cars Parked	Parking Stress	Spaces	Number of Cars Parked	Parking Stress
Maresfield Gardens	61	50	82%	9	0	0%	23	4	15%
Netherhall Gardens	15	13	83%	-	-	-	2	1	25%
Nutley Terrace	29	14	47%	12	0	0%	10	0	0%
Total	105	76	72%	21	0	0%	35	4	11%

Source: PMA Survey

Note: Some Arithmetic errors due to rounding's