



ttp consulting
transport planning specialists

The Linton Group

28 Redington Road

Appeal Statement

July 2017

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1 INTRODUCTION

1.1 TTP Consulting has been commissioned by The Linton Group ("The Appellant") to provide traffic and transport advice in relation to the Planning Appeal associated with No. 28 Redington Road ("the Site"), located in the London Borough of Camden (LBC).

1.2 A Planning Application (Ref: 2016/2997/P) was submitted in May 2016 for the:

"Erection of 4 storey plus basement building (with accommodation at 4th floor level within the roof) to provide 8 flats (1 x 1 bed, 5 x 2 bed, 1 x 3 bed and 1 x 4 bed) including front balcony and rear roof terraces, hard and soft landscaping and 7 basement car parking spaces with car lift, following demolition of the existing building (Class C3)"

1.3 An Appeal was lodged in April 2017 for non-determination, however, Camden's Statement of Case has stated that the planning application would have been rejected for various reasons, some of which relate to traffic and transport matters. These include:

Reason 6

In the absence of accurate swept path diagrams, the applicant has failed to demonstrate that the proposed development would not harm highway safety or hinder pedestrian movement contrary to policy CS11 (Promoting sustainable and efficient travel) of the London Borough of Camden Local Development Framework Core Strategy and policy DP19 (Managing the impact of parking) of the London Borough of Camden Local Development Framework Development Policies; and policy A1 of the Camden Local Plan Submission Draft 2016.

Reason 7

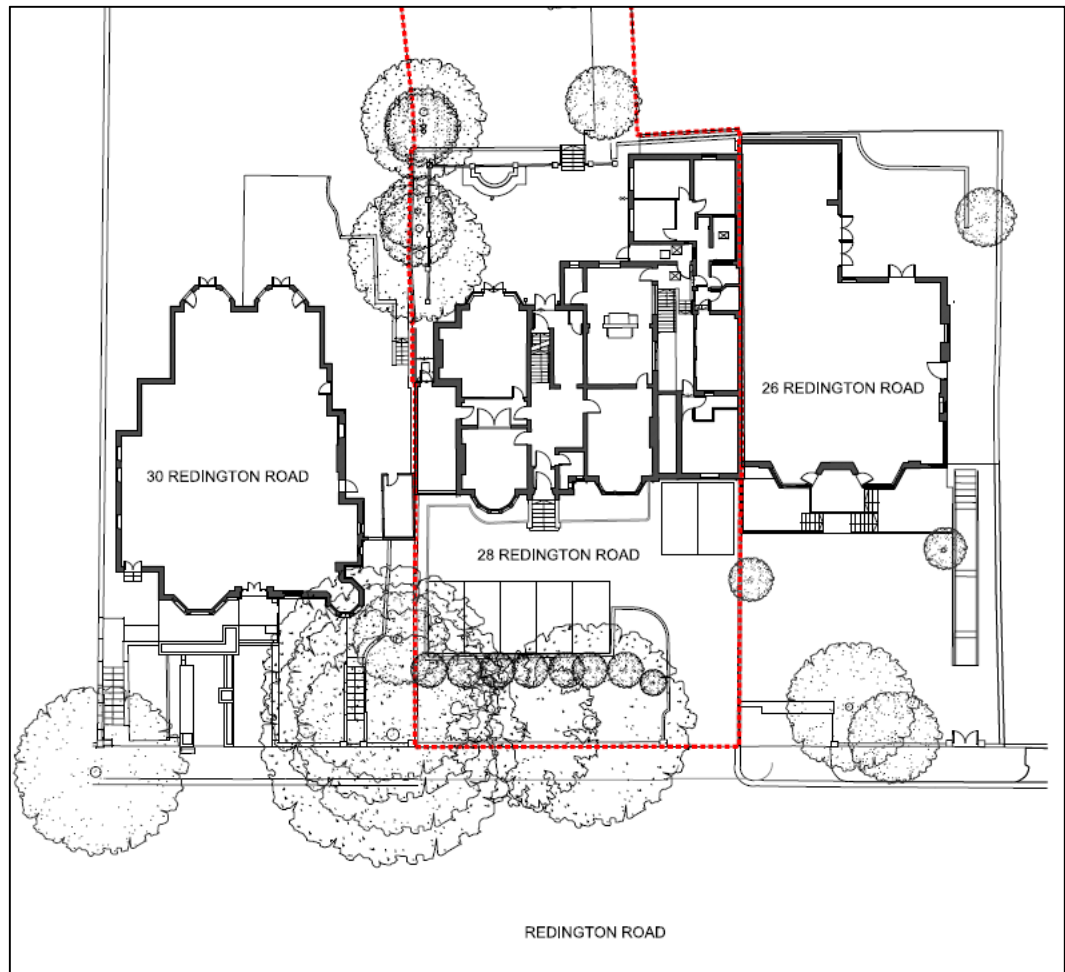
The proposed development, by reason of the increased size of the crossover, would result in the loss of on-street parking adding to existing parking problems and increasing parking pressure contrary to policy CS11 (Promoting sustainable and efficient travel) of the London Borough of Camden Local Development Framework Core Strategy and policy DP19 (Managing the impact of parking) of the London Borough of Camden Local Development Framework Development Policies; and policy A1 of the Camden Local Plan Submission Draft 2016.

1.4 This note seeks to address these suggested reasons for refusal, which are considered resolvable, and demonstrate that the development is acceptable in transport terms.

2 EXISTING SITUATION

Site

- 2.1 The site currently comprises 4 storeys of residential floor space. Forecourt / driveway parking is provided at the site frontage, with up to 7 cars noted to park within this area, as shown below within the existing site plan.



Existing Site Plan

- 2.2 Vehicular access to the forecourt parking is provided via a crossover from Redington Road. **Photo 1** provides a viewpoint of the existing site access and kerblines arrangement. At the back of the footway the width of the access measures 4.6m between the front wall and concrete bollard. It is relevant to note that the driveway varies in width between 4.7m and 5.1m once within the site. Furthermore, it is relevant to highlight the position of the curved kerbstone on the left hand side of the crossover which does not coincide with the edge of the access entrance.



Photo 1 – Site Access Junction

Local Highway Network

- 2.3 Redington Road is a two-way single lane carriageway that connects with Froggnal to the south and West Heath Road to the north. Permit holder only on-street parking is provided on both sides of the carriageway in the vicinity of the site. The road is subject to 20mph speed restrictions.
- 2.4 The site lies within a Controlled Parking Zone (CPZ), Zone CA-S, where parking controls are operational Monday through Friday between the hours of 12:30 and 14:30.

3 APPEAL PROPOSAL

- 3.1 The Appeal Proposal seeks to erect a 4 storey plus basement building (with accommodation at 4th floor level within the roof) to provide 8 flats (1 x 1 bed, 5 x 2 bed, 1 x 3 bed and 1 x 4 bed) including front balcony and rear roof terraces, hard and soft landscaping and 7 basement car parking spaces with car lift, following demolition of the existing building (Class C3).

Parking

Car Parking

- 3.2 The Appeal Proposal retains 7 off-street car parking spaces, proposed at the new basement level, including 1 space suitable for accessible needs. This level of provision does not exceed the existing number of car parking opportunities and is in accordance with policy which seeks to limit the introduction of additional residential car parking.
- 3.3 The development will be car capped with residents prevented from applying for parking permits. This would be secured via legal agreement and accords with Council policy objectives.

Cycle Parking

- 3.4 A total of 16 cycle parking spaces will be provided to serve resident and visitor cycle parking demand. The cycle parking stands will be located at lower ground floor level and provided with step free access via a passenger lift that has sufficient space to accommodate a cycle.
- 3.5 The proposed level of cycle parking provision is in accordance with London Plan cycle parking standards.

Access / Egress

- 3.6 The existing access and vehicle crossover will be retained as part of the Appeal Proposal.
- 3.7 Vehicular access and egress into the basement car park will be provided via a car lift. Adequate space will be provided off the highway in front of the entrance to the car lift and at basement level so that a vehicle can wait whilst another vehicle exits/enters respectively without impeding other vehicles or pedestrians.

Servicing and Refuse Collection

- 3.8 All servicing activity including refuse collections will be undertaken on-street in line with existing arrangements.

- 3.9 A dedicated refuse and recycling store will be provided at lower ground floor level. Bins will be transferred to the roadside prior to collection via the car lift.

4 REASONS FOR REFUSAL

4.1 This section discusses the suggested reasons for refusal that have been included within the London Borough of Camden's Statement of Case. It is considered that the matters raised are resolvable and require greater clarification to ensure that the development is acceptable in highways terms.

4.2 Reasons 6 and 7 of Camden's Statement of Case relate to the following highways matters:

- Swept path diagrams;
- The increased size of the crossover; and
- The loss of on-street parking.

4.3 These matters are reviewed in more detail in paragraphs 6.73-6.82 of the Statement of Case. Our response to these matters are provided in the following paragraphs. It is relevant to note that our assessment has always been on the basis of maintaining the existing crossover, however it is acknowledged that the drawings were not accurate.

Swept Path Diagrams

4.4 The architect's base plan for the proposed ground floor layout, on which the originally submitted vehicle swept paths were based, was inaccurate in two areas. Firstly it did not show the existing road markings for the on-street parking bays (Photo 1 shows the start of the bay on the left hand side of the image). Secondly, the layout showed a revision to the left hand radius kerb, aligning it to coincide with the edge of the driveway. For clarification, there is no intention to rely on a revision to the crossover and it is not proposed to widen it.

4.5 Revised swept path diagrams are provided at **Appendix A**. The drawings have been prepared and based on the existing access arrangement which will be retained. The drawings also include the existing on-street parking bays. In addition, the drawings demonstrate how vehicles would pass each other within the site at ground and basement level in the event two vehicles met before entering or exiting the car lift.

- 4.6 The revised drawings indicate that vehicles can enter and exit the site without harm to highway safety or hinder pedestrian movement. Furthermore, given there is no change to the existing access arrangement and given the development would accommodate the same number of on-site parking spaces as existing, there is expected to be no material change in highways terms. In summary, the relationship between the driveway and the crossover of the footway leading to Redington Road is to remain as existing.

Size of the Crossover

- 4.7 The original architect's plans and swept path analysis submitted with the planning application showed a widened crossover that allowed the kerblines to align with the edge of the site access. This was an error as the kerbstone associated with the existing vehicle crossover does not currently align with the edge of the access entrance and instead encroaches circa 0.8m into the access.
- 4.8 The Appeal Proposals will not amend the existing crossover. As such there is no widening proposed. This is considered to represent Option 1 – retain existing crossover arrangement.
- 4.9 The access will continue to serve the same number of parking spaces as it does currently therefore the existing vehicle crossover is considered to be able to accommodate the likely level of vehicle movements. Furthermore, the following photograph was taken during a site visit in June 2017 which demonstrates that there is no evidence of damage to the existing kerbstones or evidence of "tyre scrub" over the surfacing, suggesting that vehicles are not cutting across this corner in order to access the driveway. This therefore suggests that the existing access is fit for purpose.



Photo 2 – Option 1 (retain existing kerbstone)

- 4.10 Notwithstanding the above, if the highways authority considered that the kerbline should align with the site access boundary then there are two additional options available that would not result in the loss of any on-street parking and which the appellant would be prepared to fund. These are discussed in the following paragraphs.
- 4.11 Option 2 would seek to remove the existing straight kerbstone that is located between the start of the on-street parking bays and the existing curved kerbstone which forms part of the vehicle crossover. The curved kerbstone could then be moved closer to the on-street parking bays to align with the access.

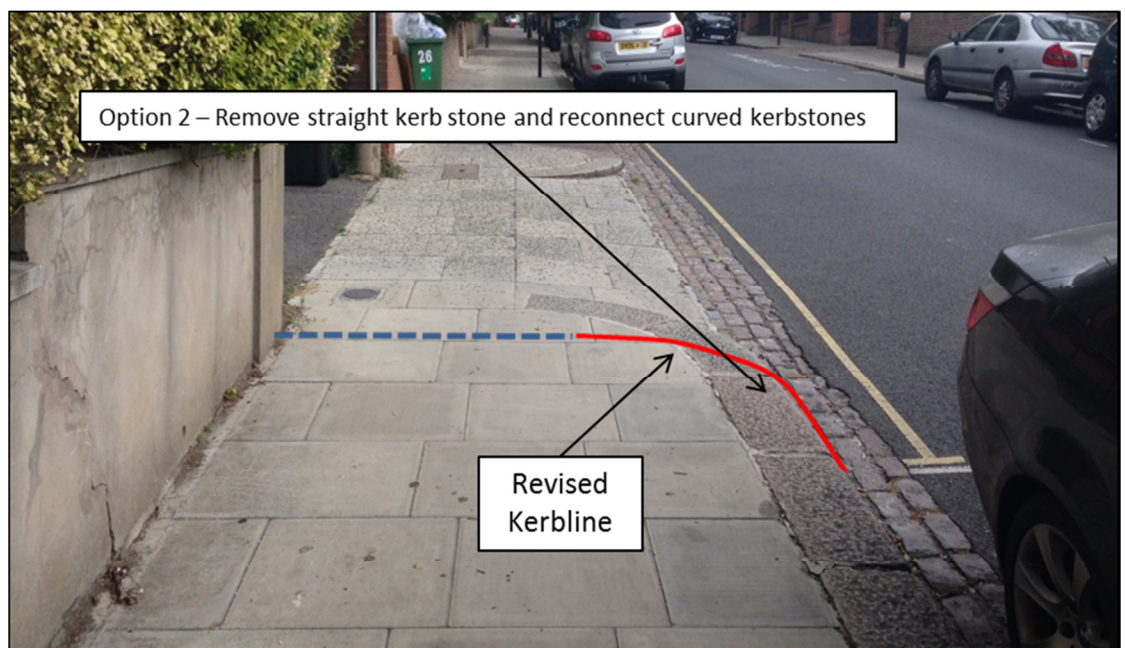


Photo 3 – Option 2 (remove straight kerbstone and reconnect kerbs)

- 4.12 Option 3 would seek to reduce the kerb radius of the existing curved kerbstone and replace with a bull nosed kerbstone similar to other access arrangements along Redington Road.



Photo 4 – Option 3 (install bull nosed kerb)

4.13 It is pertinent to note that both options to amend the existing kerbline would not change the existing relationship between the position of the on-street parking bays and the existing left hand side of the access. As such, there would be no impact on on-street parking.

4.14 The relationship between the edge of the driveway and the start of the parking bays is no different between Option 1 - the Do-Nothing approach, Option 2 and Option 3 scenarios. There will be no widening of the driveway and hence no need to revise the on-street parking arrangement.

Loss of On-street Parking

4.15 The inaccurate vehicle swept path drawing submitted with the application has invited doubt as to whether or not the driveway and crossover were being revised and with no parking bay markings shown it was consequently unclear whether or not there would be a revision to the parking bays.

4.16 It has since been demonstrated that there are no proposals to widen the driveway and that the existing crossover, whilst unconventional in its appearance, does not necessitate any revisions as a result of the development. Vehicles will be able to enter and exit as freely as they do now.

- 4.17 However, should the highway authority wish that the curved kerbstone be revised in order to coincide with the edge of the driveway then two additional options have been presented. Such work would be delivered by the applicant on behalf of the Council by way of a Section 278 highway agreement.
- 4.18 None of the options necessitate any revisions to on-street parking bays and hence there is no loss of on-street parking capacity.

5 POLICY REVIEW

- 5.1 A review of local policy has been undertaken with focus on the specific policies outlined by Camden in their Statement of Case. This section highlights the relevant policy and how the scheme complies. It is relevant to note that there is no intention to revise the existing crossover and it is not proposed to widen it. As such there would be no loss in on-street parking.

Camden Core Strategy Local Development Framework (2010-2025)

Policy CS11 – 'Promoting sustainable and efficient travel'

- 5.2 *"As part of its approach to minimising congestion and addressing the environmental impacts of travel, the Council will:*

k) minimise provision for private parking in new developments, in particular through:

– car free developments in the borough's most accessible locations and

– car capped developments;

n) ensure that growth and development has regard to Camden's road hierarchy and does not cause harm to the management of the road network."

- 5.3 There are no proposals to increase the number of on-site parking opportunities when compared with the existing situation. Furthermore, the development would be car capped with residents prevented from applying for parking permits. This is proposed to be secured via legal agreement.

- 5.4 There are also no proposals to amend the existing crossover. Revised swept path drawings have been prepared to demonstrate that the existing access arrangement is fit for purpose and therefore it is considered that there would be no change to the existing road network.

- 5.5 On this basis, the proposals are considered to be in accordance with Policy CS11.

Camden Development Policies Local Development Framework (2015-2025)

Policy DP19 – 'Managing the impact of parking'

- 5.6 *"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;”*

5.7 Paragraph 19.4 of this document in respect of on-street parking states:

"Development that will reduce the amount of on-street parking or add to on-street parking demand will be resisted where it would cause unacceptable parking pressure, particularly in areas of identified parking stress. Policy DP18 states that, where the need for parking is accepted, developments in areas of high on-street parking stress should be 'car capped'. Our Camden Planning Guidance supplementary document gives details of areas where there is parking stress in the borough."

5.8 Paragraph 19.9 refers to creating private off-street car parking and states:

"Development of off-street parking will be resisted where it would cause unacceptable parking pressure, particularly in identified areas of parking stress. Off-street parking may also be resisted to protect the environment, highway safety and pedestrian movement. Our Camden Planning Guidance supplementary document gives details of areas of parking stress, the necessary dimensions for off-street parking spaces, visibility requirements at access points, and environmental concerns that arise from garden and forecourt parking."

5.9 The existing access arrangement is not proposed to change. Furthermore, there is no increase in the number of parking opportunities that the access will serve. As such the existing conditions are relevant and therefore considered to not harm highway safety, hinder pedestrian movements or provide inadequate site lines.

5.10 The existing on-street parking conditions will not change as part of the proposals given the existing access arrangement will be retained. There will be no loss to existing on-street parking opportunities and the development will be car-capped. As such, there would be no additional pressure on parking.

5.11 Revised swept path drawings demonstrate that the existing access is fit for purpose and that there is no requirement to lose any on-street parking.

5.12 Based on the above, the proposals are in accordance with policy and would not harm highway safety or hinder pedestrian movement.

Camden Planning Guidance Transport CPG 7

5.13 Paragraph 7.19 of CPG 7 states

"In each case, an area should be provided within the site for all vehicles waiting for a traffic signal, barrier or vehicle lift. This area should be sufficient to accommodate the maximum likely number of queuing vehicles, without any obstruction to pedestrians and vehicles using the public highway. Where a lift, ramp or other access is only available to one vehicle or direction of flow, there must be space at each end for leaving vehicles to pass those queuing to enter."

5.14 Space has been provided at ground and basement level within the site to allow vehicles to pass each other in the event the lift is in operation and queuing occurs. This has been shown on the swept path drawings.

Camden Local Plan Adopted Version (June 2017)

5.15 The Local Plan was recently adopted in June 2017 and replaces the Core Strategy and Development Policies planning documents (adopted in 2010). The document still however refers to the importance of Camden's Planning Guidance documents.

5.16 The relevant policies set out in the Local Plan are set out below.

Policy A1 – 'Managing the impact of development'

5.17 *The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity.*

5.18 *We will:*

a) Resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and

b) Require mitigation measures where necessary.

5.19 The transport impacts associated with the development have been assessed and addressed and it is considered that the proposals do not create a harmful impact in highways terms. Mitigation measures have also been proposed if considered necessary.

Policy T2 – Parking and car-free development

- 5.20 *"The Council will limit the availability of parking and require all new developments in the borough to be car-free. We will not issue on-street or on-site parking permits in connection with new developments and use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits".*
- 5.21 The applicant is prepared to enter into a legal agreement to ensure that future occupants are not entitled to on-street parking permits.

6 SUMMARY AND CONCLUSION

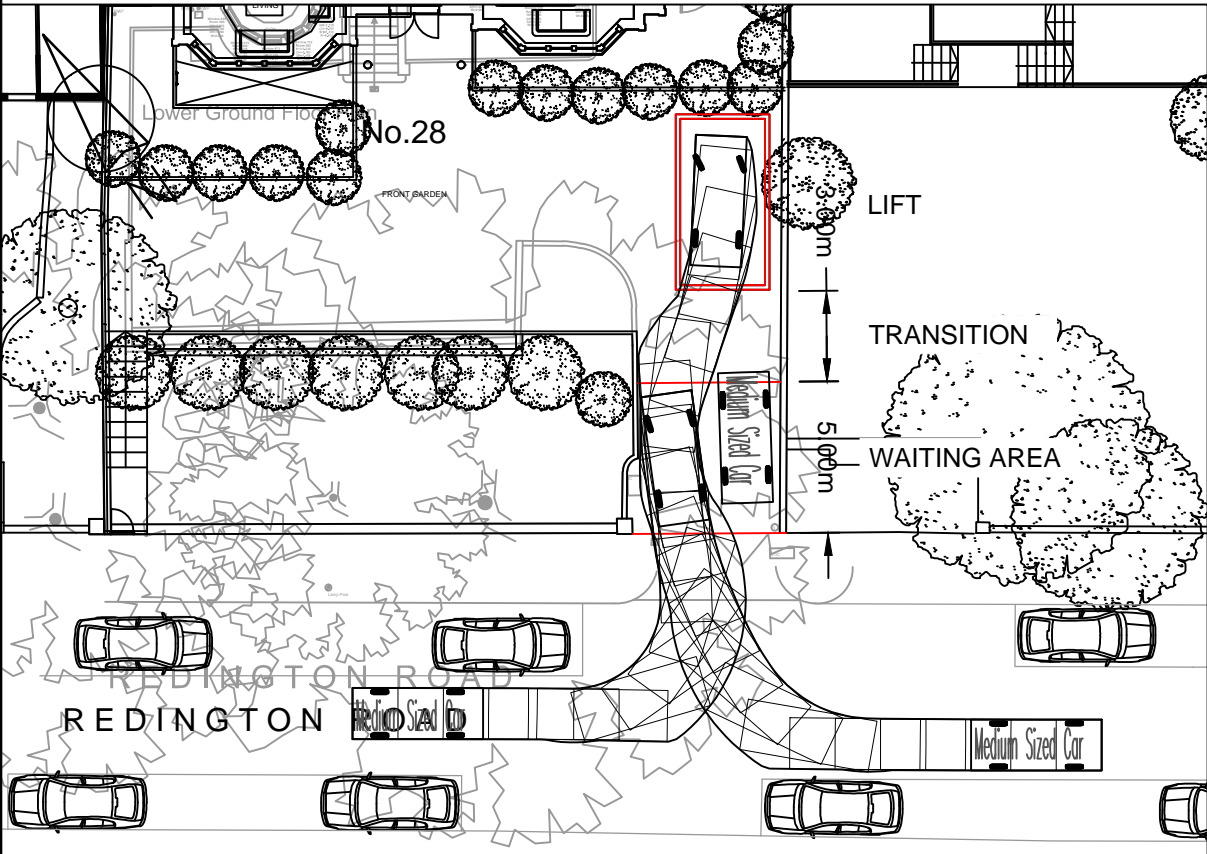
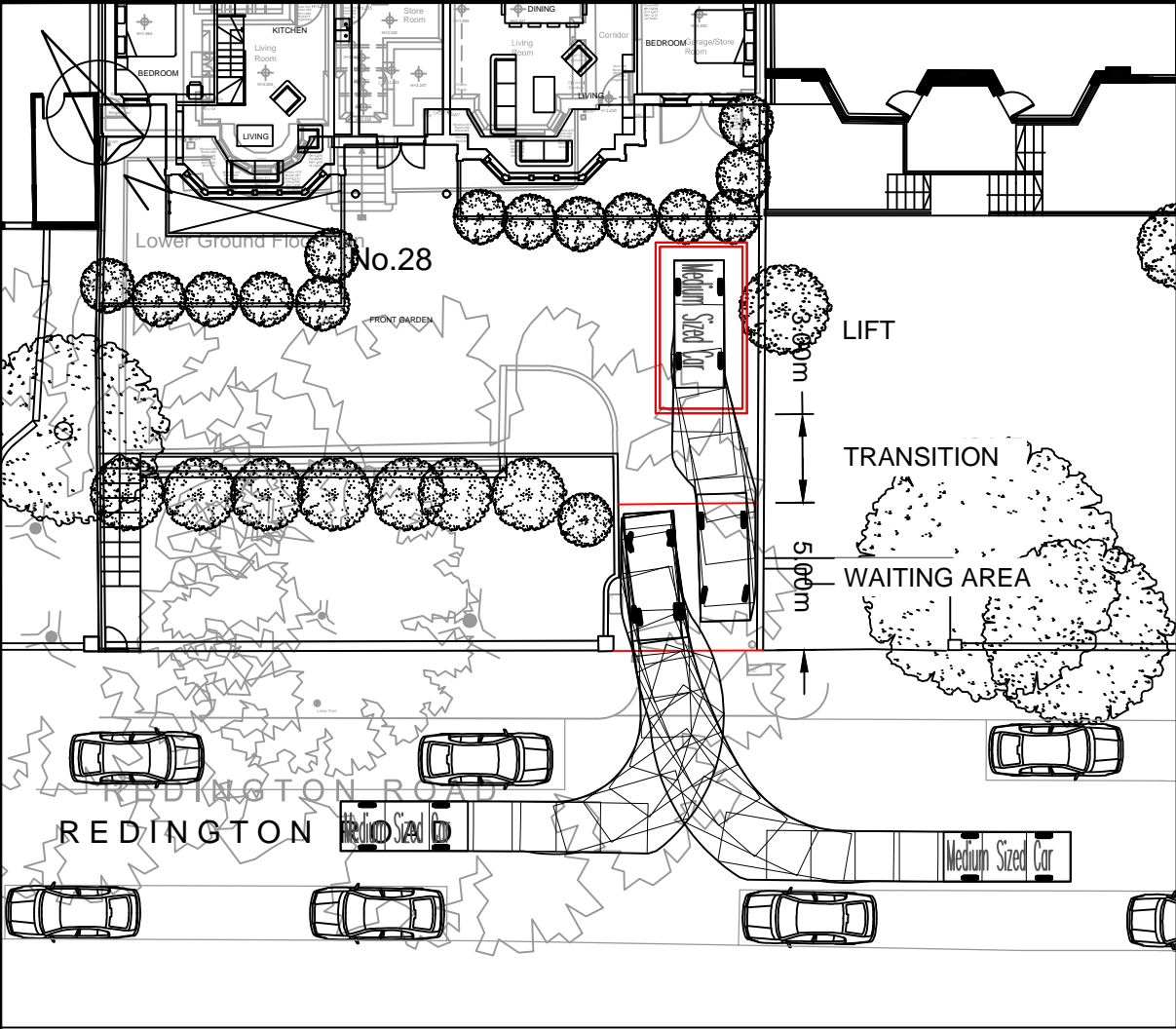
Summary

- 6.1 TTP Consulting has been commissioned by The Linton Group ("The Appellant") to provide traffic and transport advice in relation to the Appeal Proposal at No. 28 Redington Road ("the Site"), located in the London Borough of Camden (LBC).
- 6.2 The Appeal was submitted for non-determination, however, the London Borough of Camden has stated that the application would have been refused for various reasons including those relevant to traffic and transport matters. In our view these matters are resolvable, therefore, in summary:
- The Appeal Proposals would make use of the existing access which will serve the same number of on-site parking spaces as existing. As such, there is no change in the likely level of vehicle traffic and therefore the existing access is considered fit for purpose;
 - Revised swept path diagrams have been prepared to demonstrate that the existing access and vehicle crossover is suitable. The drawings now accurately show the existing kerblines and include the on-street parking bays;
 - The swept path drawings demonstrate that there is sufficient space on-site at ground floor and basement level to accommodate two cars passing without any obstruction to pedestrians and vehicles using the public highway;
 - There are no proposals to widen the crossover. As such there is no requirement to lose any on-street parking. Should however the Council deem it appropriate to revise the existing kerbline it is considered that there are 2 potential options available to undertake these changes without any loss in on-street parking.

Conclusion

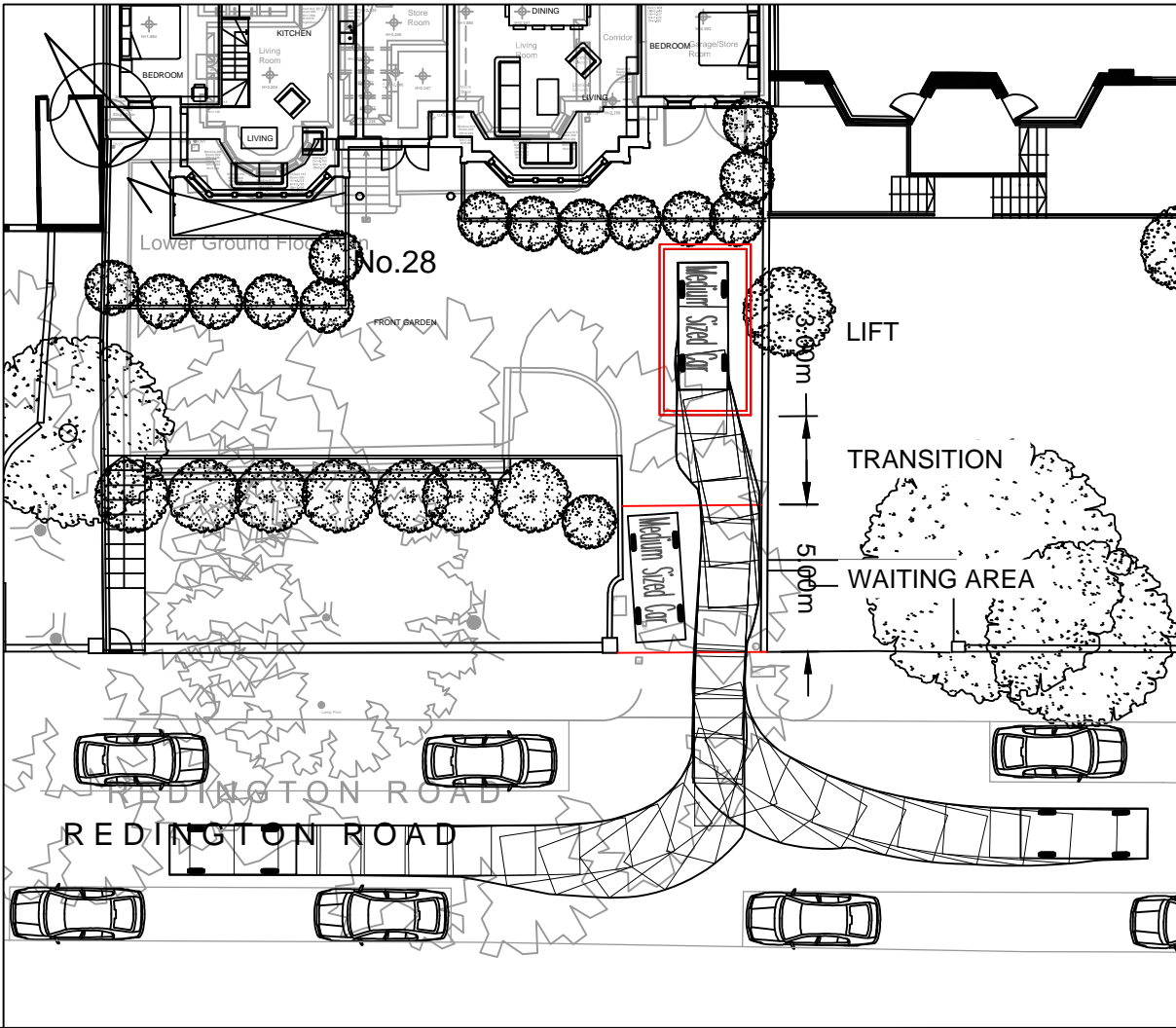
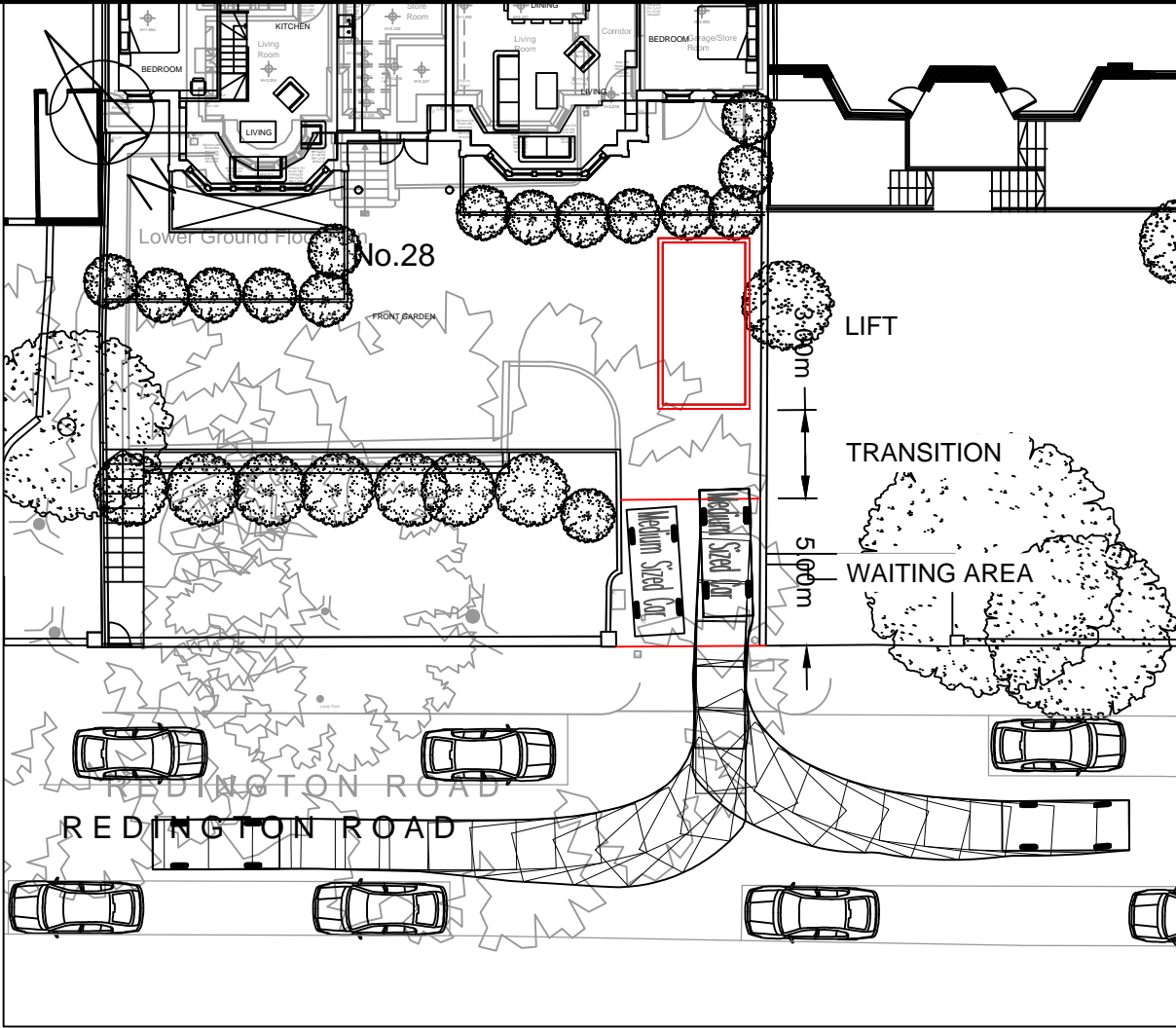
- 6.3 The proposed development is in accordance with local policy. Furthermore, and in accordance with NPPF paragraph 32, the residual cumulative impacts of the development are not considered severe, and, as such, should not be prevented or refused on transport grounds.

Appendix A



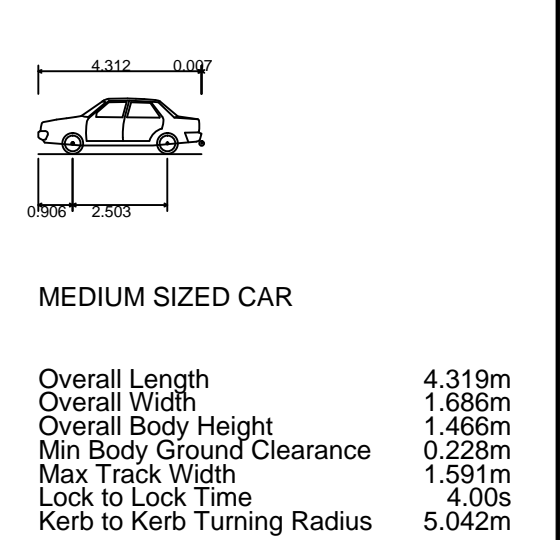
NOTES:

1. Do not scale from this drawing.
2. This drawing is to be read & printed in colour.
3. This drawing is for illustrative purposes only.
4. The internal layout has been provided by Jo Cowen Architects (Drawing. No. JCA-RR-PR-011), and TTP shall not be liable for any inaccuracies or deficiencies.



Rev	Details	Drawn	Checked	Date
A	Architects base & tracking updated	AS	DF	29.03.16
B	Architects base & tracking updated	AS	DF	15.04.16
C	Architects base & tracking updated	AS	DF	17.05.16
D	Architects base & tracking updated	AS	DF	05.07.17
E	Topo survey added	DW	DF	11.07.17
F	Notes and North point amended	DW	DF	20.07.17

VEHICLE DETAILS:



	FORWARD MOVEMENTS ARE SHOWN IN BLACK (design speed for all forward movements - 5kph)
	REVERSE MOVEMENTS ARE SHOWN IN RED (design speed for all reverse movements - 2.5kph)

Client
The Linton Group

Project
Redington Road

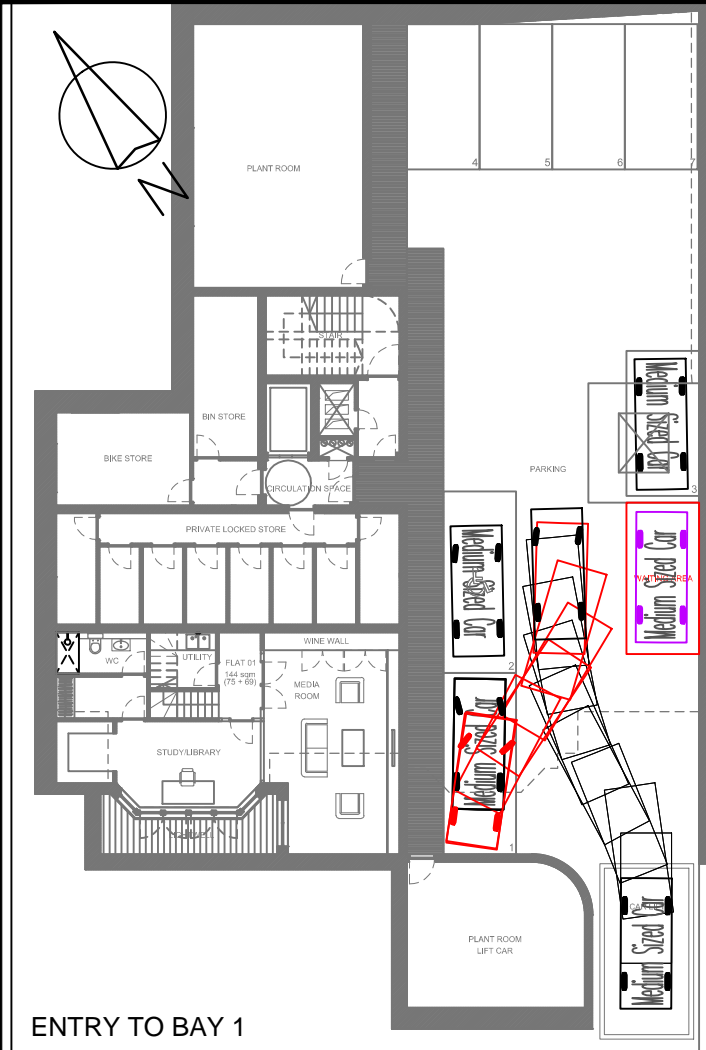
Drawing Title
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Drawn	AS	04.09.15	
Checked	DF	04.09.15	

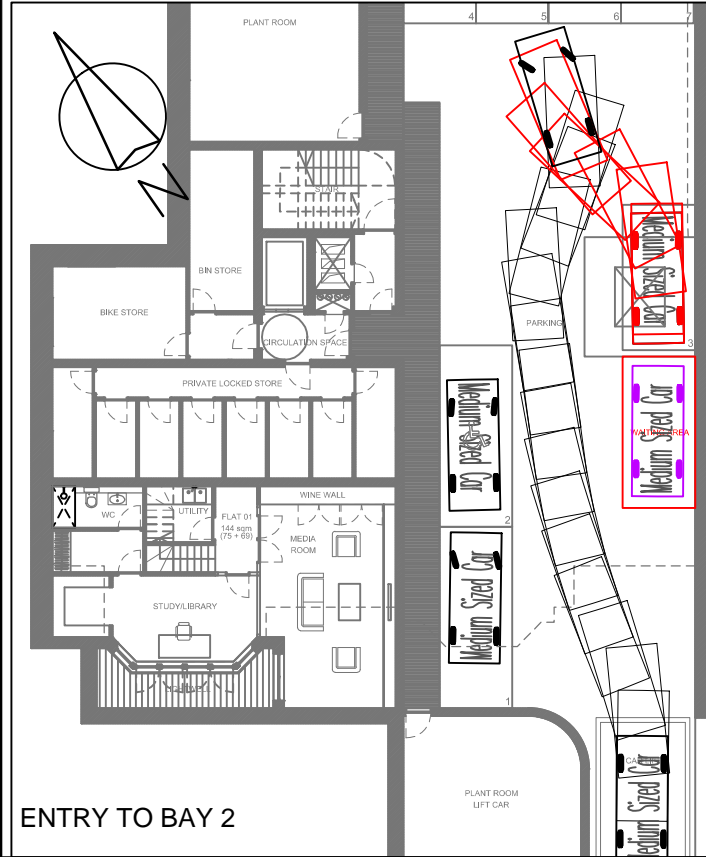


111 - 113 Great Portland Street
London
W1W 6QQ
Tel. No. 0207 1000 753

Drawing Number	2015-2538-AT-004	Rev	F
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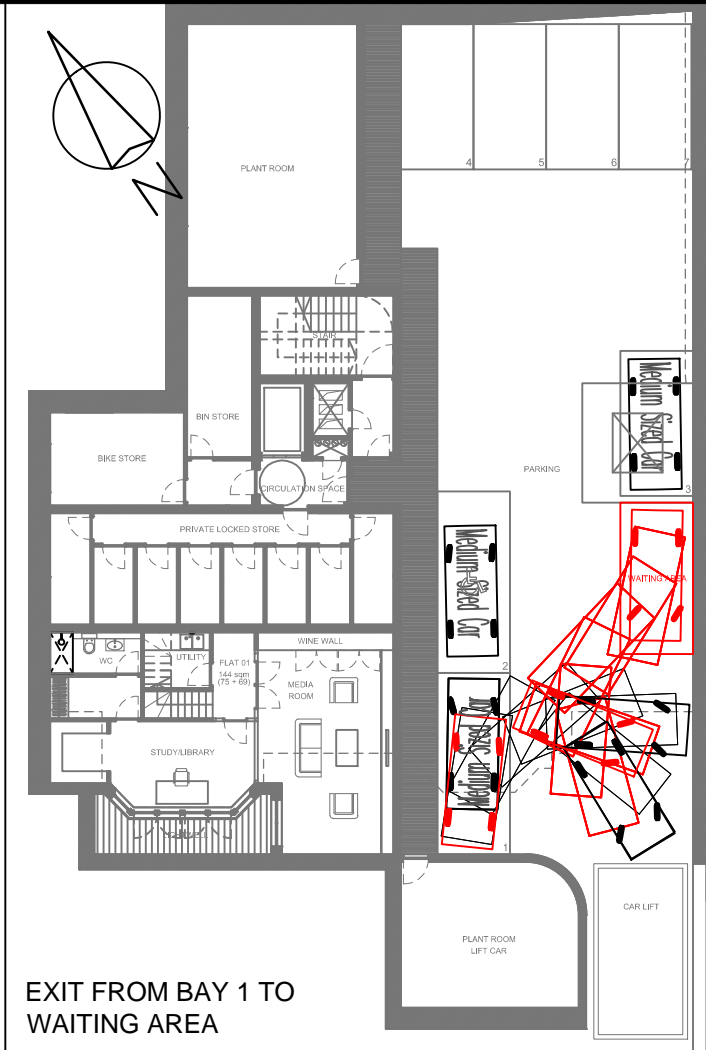


ENTRY TO BAY 1

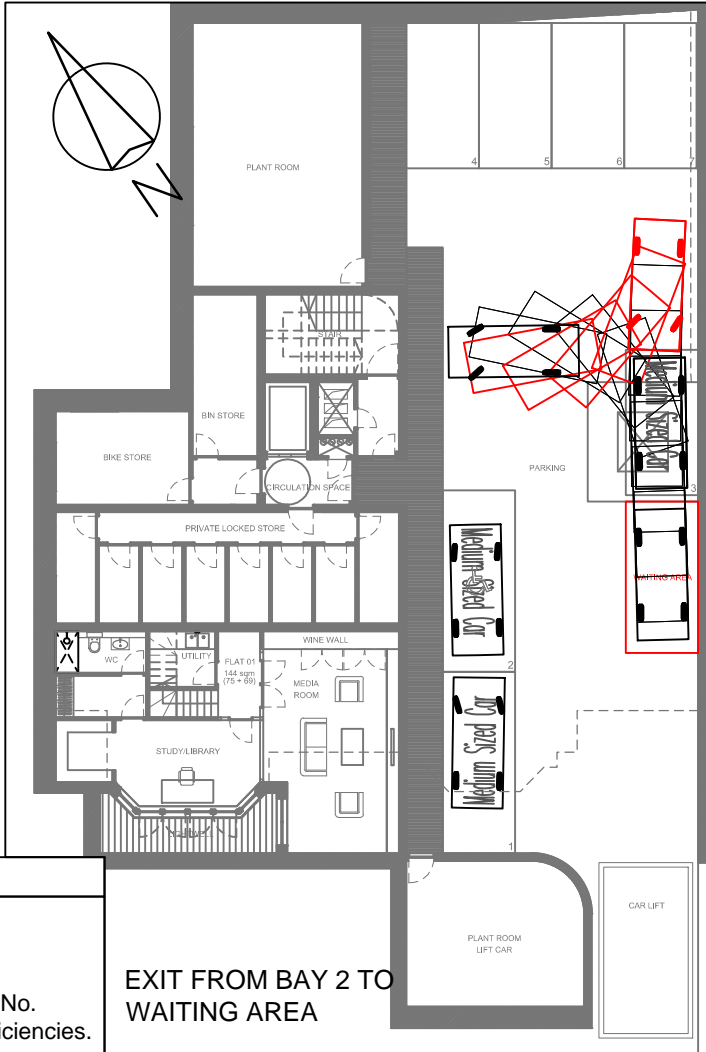


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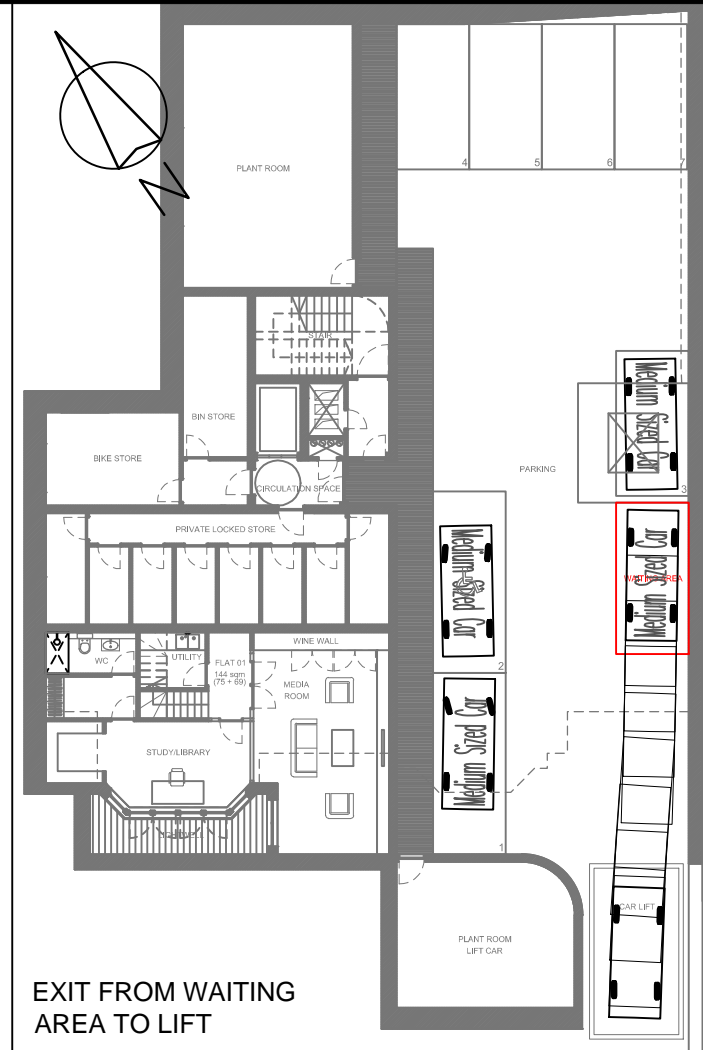
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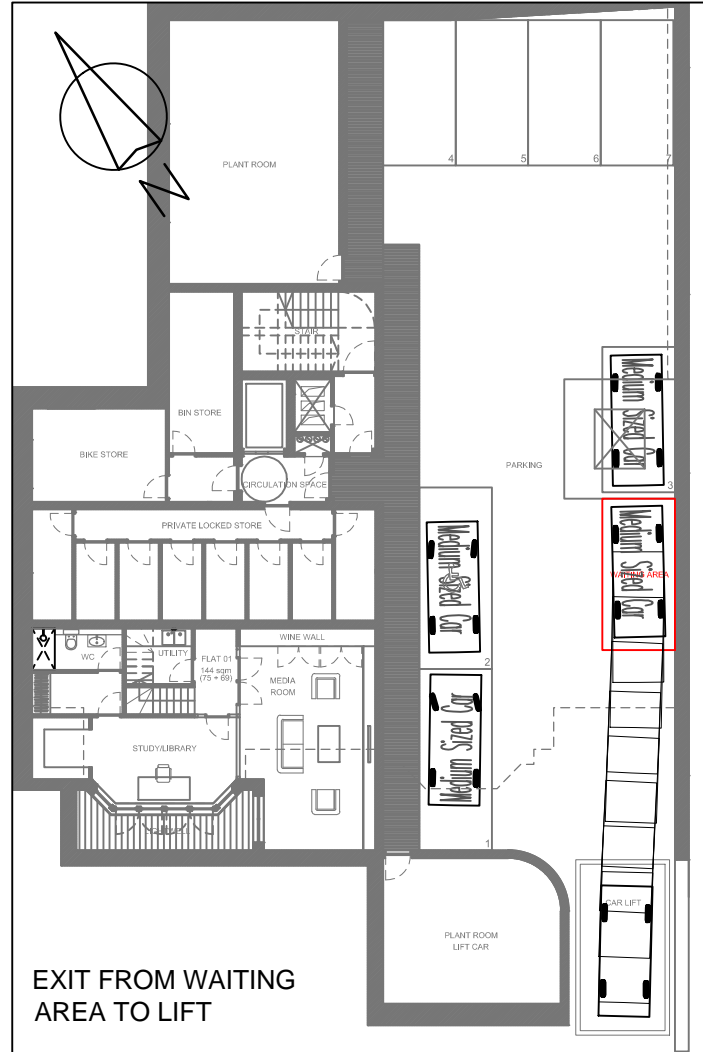
EXIT FROM BAY 1 TO
WAITING AREA



EXIT FROM BAY 2 TO
WAITING AREA



EXIT FROM WAITING
AREA TO LIFT



EXIT FROM WAITING
AREA TO LIFT

Rev	Details	Drawn	Checked	Date
A	Architects base & tracking updated	AS	DF	29.03.16
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C	Architects base & tracking updated	AS	DF	03.07.17
D	Notes and North point amended	DW	DF	20.07.17

VEHICLE DETAILS:

MEDIUM SIZED CAR

Overall Length 4.319m
Overall Width 1.686m
Overall Body Height 1.466m
Min Body Ground Clearance 0.228m
Max Track Width 1.591m
Lock to Lock Time 4.00s
Kerb to Kerb Turning Radius 5.042m

FORWARD MOVEMENTS ARE SHOWN IN BLACK
(design speed for all forward movements - 5kph)

REVERSE MOVEMENTS ARE SHOWN IN RED
(design speed for all reverse movements - 2.5kph)

Client
The Linton Group

Project
Redington Road

Drawing Title
Swept Path Analysis using a Medium Size Car (Basement)

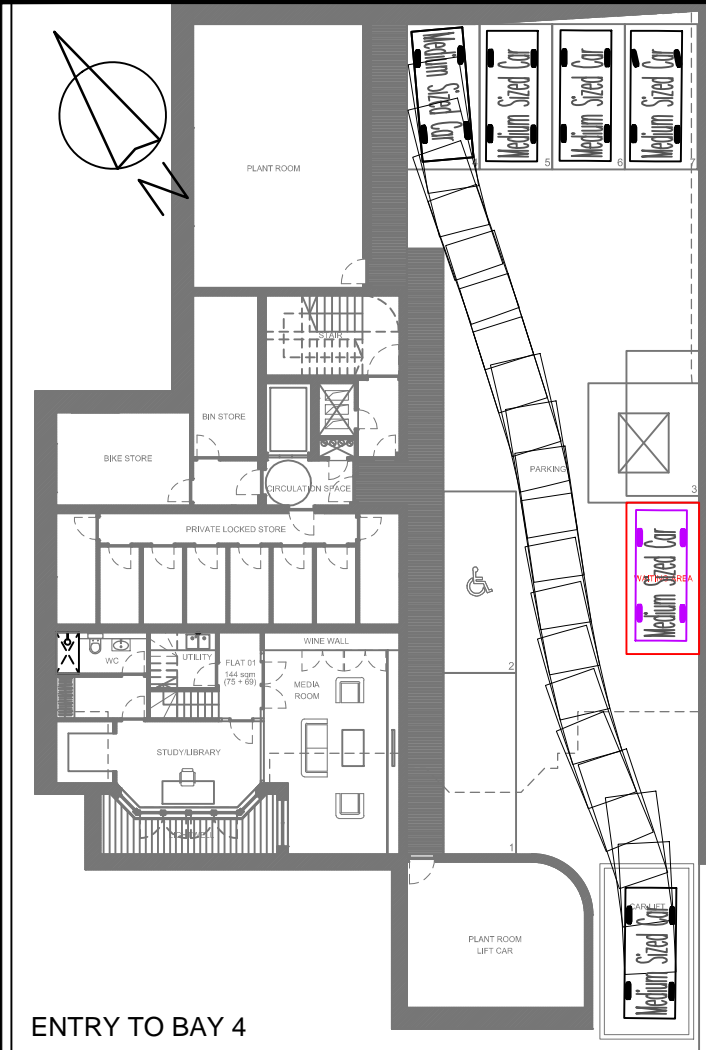
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Checked DF 04.09.15

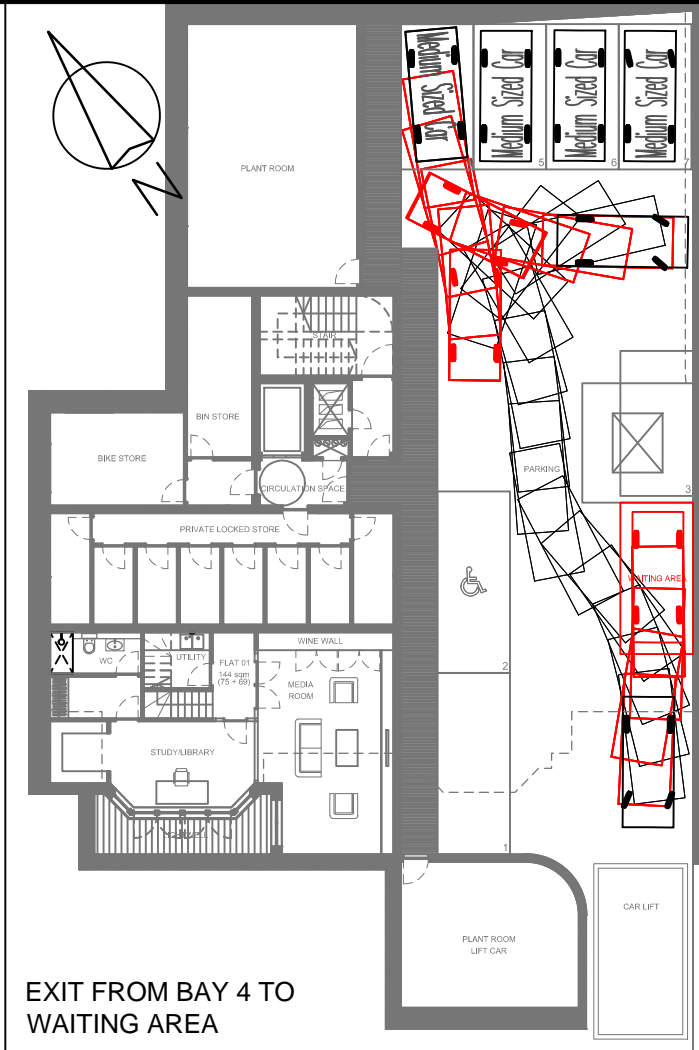
transport planning specialists

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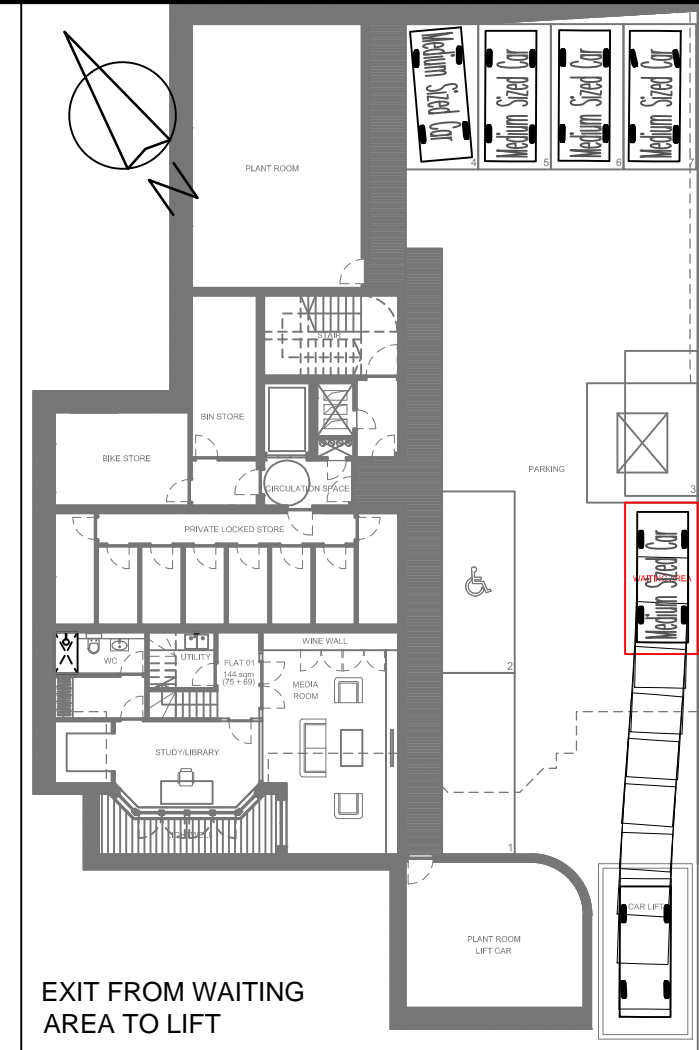
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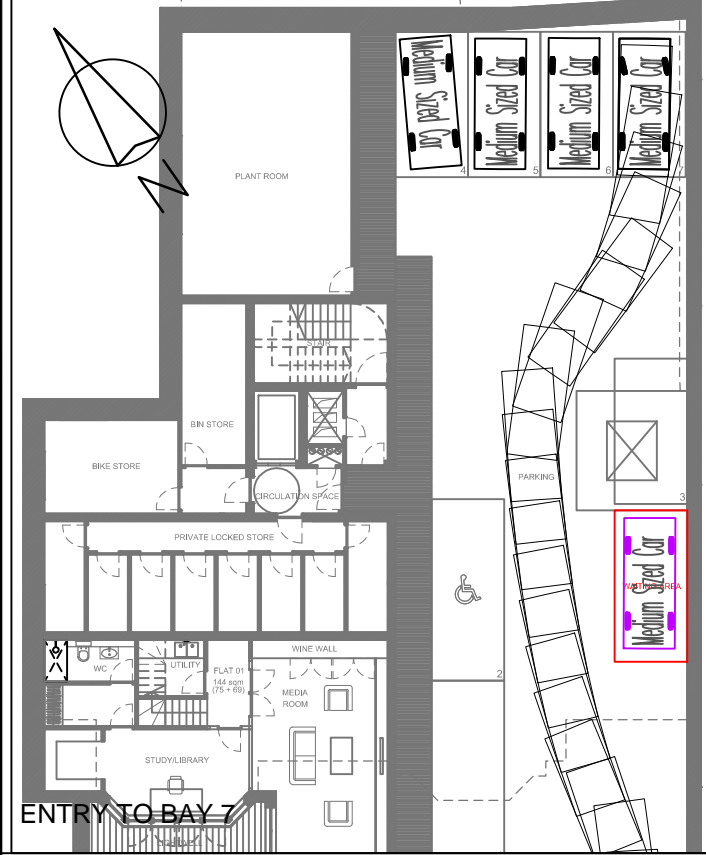
ENTRY TO BAY 4



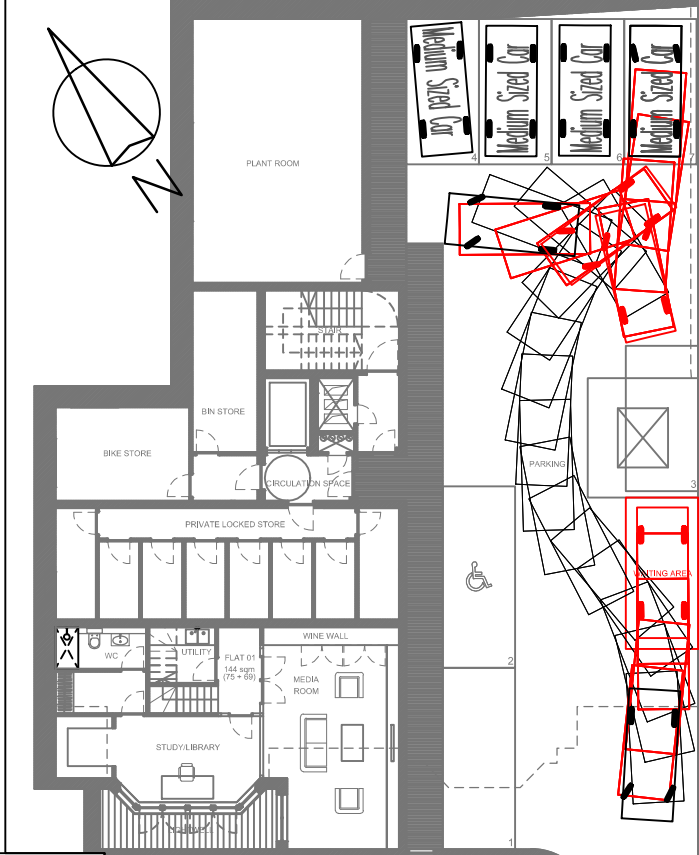
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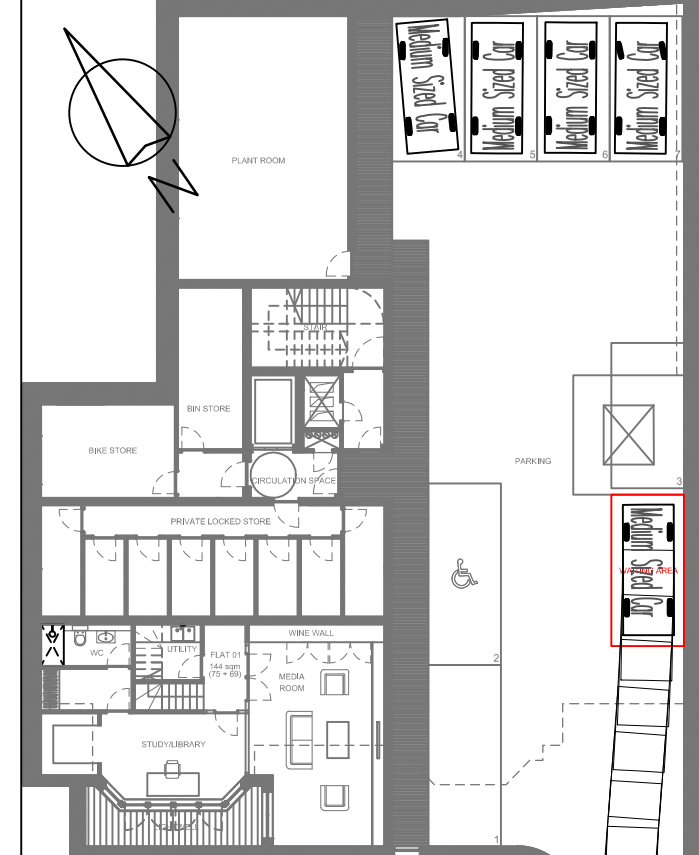
EXIT FROM WAITING AREA TO LIFT



ENTRY TO BAY 7



EXIT FROM BAY 7 TO WAITING AREA

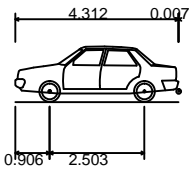


EXIT FROM WAITING AREA TO LIFT

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D	Notes and North point amended	DW	DF	20.07.17


VEHICLE DETAILS:



MEDIUM SIZED CAR

Overall Length	4.319m
Overall Width	1.686m
Overall Body Height	1.466m
Min Body Ground Clearance	0.228m
Max Track Width	1.591m
Lock to Lock Time	4.00s
Kerb to Kerb Turning Radius	5.042m

	FORWARD MOVEMENTS ARE SHOWN IN BLACK (design speed for all forward movements - 5kph)
	REVERSE MOVEMENTS ARE SHOWN IN RED (design speed for all reverse movements - 2.5kph)

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