

One Housing Group

Bangor Wharf

LPA Reference: 2016/1117/P

PINS Reference: APP/X5210/W/16/3165200

Proof of Evidence (Main Text – Volume 1)

Neil Brant MSc, CMCILT

October 2017

REPORT CONTROL

Document: Proof of Evidence (Main Text Volume 1)

Project: Bangor Wharf

Client: One Housing Group

Job Number: 151955B

File Origin: X:\Projects\150000\151955 - Bangor Wharf, Camden\151955B - Bangor Wharf
Appeal\WORD\151955B_R01-VP+NB-Proof of Evidence-Transport_Final_231018.docx

Document Checking:

Primary Author	N. Brant	Initialled:	NB
-----------------------	----------	--------------------	----

Contributor	V. Porter	Initialled:	VP
--------------------	-----------	--------------------	----

Review By	N. Brant	Initialled:	NB
------------------	----------	--------------------	----

Issue	Date	Status	Checked for Issue
1	07.09.17	1 st Draft	N Brant
2	08.10.17	2 nd Draft	N Brant
3	16.10.17	3 rd Draft	N Brant
4	18.10.17	4 th Draft	N Brant
5	23.10.17	FINAL	N Brant

Contents (Volume 1)

1	THE WITNESS	3
2	SCOPE OF EVIDENCE	5
	Introduction	5
	Matters Addressed in this Evidence	8
3	RELEVANT POLICY COMPLIANCE	9
	Introduction	9
	National Planning Policy Framework (NPPF)	9
	London Borough of Camden Local Plan 2017	12
	Policy T1 Prioritising walking, cycling and public transport	12
	Policy T3 Transport infrastructure	14
	Camden Planning Guidance 7 : Transport	15
	London Plan Chapter 6 : London's Transport	16
	Section Summary	16
4	BACKGROUND	17
	Site Location	17
	Site Accessibility	17
	Public Transport	19
	Car Club	21
	Proposed Scheme	21
	Pedestrian Access	21
	Cycle Parking	21
	Travel Plan	22
	Section Summary	22
	Bangor Wharf Alternative Cycle Parking Options	23
5	REASON FOR REFUSAL 8	26
	CPG 7 Criteria	26
	Accessibility	28
	Security	31
	Section Summary	32
6	SUMMARY AND CONCLUSIONS	34
	Summary	34
	Conclusions	35
7	SIGNED AFFIRMATION	36

Figures (Volume 2)

- Figure NB1** - Site Location Plan
- Figure NB2** - 2km Accessibility Plan
- Figure NB3** - 5km Accessibility Plan
- Figure NB4** - Location of Nearest Cycle Docking Station
- Figure NB5** - Site Layout

Appendices (Volume 2)

- Appendix NB-A** – Drawing 151955/A/06 – Proposed Highway Works
- Appendix NB-B** – London Plan Chapter Six Table 6.3
- Appendix NB-C** – Extract of TfL London Cycle Guide 7 (2012/13)
- Appendix NB-D** – TfL WebCAT PTAL Output

Summary Proof (Volume 3)

1 THE WITNESS

- 1.1 My name is Neil Brant. I have a Master of Science Degree in Transport Planning and Highway Engineering from the University of Southampton. I am a Chartered Member of the Chartered Institute of Logistics and Transport. I have over 30 years' experience working for consulting engineers in the UK and my career has been focussed on providing expertise in the traffic engineering and transport planning aspects of development related projects.
- 1.2 I am a Board Director of Vectos, consultants in traffic and transport, where I have worked since 2015. Before this I was a Technical Director for WSP, responsible for the traffic and transportation teams across the West and South West of England, and prior to this I held a number of senior positions in Consultancy's responsible for the provision of traffic and transport advice to private and public sector clients.
- 1.3 My professional experience includes considering the transport impact of major developments, the design of infrastructure and the integration of non-car travel solutions into developments.
- 1.4 I have presented expert witness evidence dealing with transportation at planning appeal inquiries and hearings and at local plan inquiries.
- 1.5 Vectos is a renowned transport planning consultancy providing a wide range of services to the development sector. With over 100 transportation and infrastructure professionals employed in the UK, its reputation as one of the foremost transport and infrastructure specialists has been developed over many successful projects. Vectos has a broad base of Blue Chip clients in the planning and development sector and as such the company has significant experience in the issues that are relevant to this Inquiry.
- 1.6 My evidence will deal with traffic and transport issues relating to the Appeal scheme at Bangor Wharf. For the purposes of giving evidence I have familiarised myself with the site and the surroundings and reviewed such material as necessary to enable me to form a judgement on the matters that I deal with at this Inquiry.

- 1.7 This Proof of Evidence has been prepared in response to the concerns expressed about cycle parking provision proposed as part of the development, within the reasons for refusal issued by the London Borough of Camden.
- 1.8 My evidence sets out details of the proposed cycle parking provision at Bangor Wharf together with a number of alternative cycle parking options that were put forward for consideration by the London Borough of Camden post submission. I also reference details of the proposed measures to encourage cycle uptake by future residents of the proposed development.
- 1.9 My evidence demonstrates that the proposed cycle parking provision is provided in accordance with Council Policy in a manner which does not discourage use by cyclists in the future.
- 1.10 The evidence which I have prepared and provide for this Inquiry in this Proof of Evidence is true and has been prepared and is given in accordance with the guidance of my professional institute and I confirm that the opinions expressed are my true and professional opinions, irrespective of by whom I am instructed.

2 SCOPE OF EVIDENCE

Introduction

- 2.1 In September 2015 Vectos were appointed by One Housing Group (here after referred to as the Appellant) to prepare a Transport Statement report (TS) and Travel Plan Statement (TPS) to support a full planning application for development at Bangor Wharf (the appeal site) to provide 46 new residential units and 604 sqm. of B1a floorspace.
- 2.2 The TS and TPS (**CD-D6**) were submitted to London Borough of Camden (the Council) in support of the planning application (LPA Reference 2016/1117/P) in February 2016 with the application registered on 3rd March.
- 2.3 In a response from the Council dated 6th May 2016 a number of specific transport queries were raised. In summary, the Council queries were:
- “How will people be prevented from accessing the main forecourt and parking there?”
 - “How will people be prevented from parking in the area to the north of the gates in the tunnel?”
 - “The cycle parking does not meet design standards, as they appear to be semi vertical stands which we do not accept due to them not being accessible and is not in line with Camden’s Core Strategy 11, Camden Planning Guidance 7 and Development Policy16. We only accept Sheffield Stands of two tier Josta and must meet design standard as set out in CPG7, section 9.”
- 2.4 Vectos submitted a detailed response to the Council’s queries (**CD-D6**), dated May 2016.
- 2.5 The application was refused and the decision notice, dated 17th June 2016, stated the reasons for refusal on transport matters:

8. The proposed development, by reason of the type of cycle parking and its layout and location, would discourage the ownership and use of cycles as a sustainable form of transport, contrary to Policy CS11 (Promoting sustainable and efficient travel) and policies DP16 (The transport implications of development), (DP17) Walking, cycling and public transport and DP18 (Parking standards and limiting the availability of car parking) of the London Borough of Camden Local Development Framework Development Policies.

13. The proposed development, in the absence of a travel plan, would be likely to give rise to significantly increased car-borne trips, contrary to policies CS11 (Promoting sustainable and efficient travel) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policies DP16 (Transport implications of development) and DP17 (Walking, cycling and public transport) of the London Borough of Camden Local Development Framework Development Policies.

14. The proposed development, in the absence of a legal agreement to secure a carfree development, would be likely to contribute unacceptably to parking stress and congestion in the surrounding area and would fail to provide access for people with mobility difficulties, contrary to policies CS6 (Providing quality homes), CS11 (Promoting sustainable and efficient travel) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policy DP18 (Parking standards and the availability of car parking) of the London Borough of Camden Local Development Framework Development Policies.

2.6 I understand that the Council no longer rely on reasons for refusal 11-13 and 16-17 and as such I do not address these issues in my evidence.

2.7 With regards to reason for refusal 14, the Appellant has included within the unilateral s106 provision for the following highways works:

- Payment of the sum of £2,500 (two thousand five hundred pounds) to be paid by the Owner to the Council in accordance with the terms of this Agreement and to be applied by the Council in event of receipt for the carrying out works to the

public highway and associated measures in the vicinity of the Property such works to include the following (“the Highways Works”):-

- Works for the reinstatement of 2 No. redundant vehicular crossovers as footway, as identified in Vectos Drawing No. 151955/A/06;
 - Works for the reconstruction of 1 No. vehicular crossover to be retained, as identified in Vectos Drawing No. 151955/A/06;
 - any other works the Council acting reasonably requires as a direct result of the Development
- all works will be subject to final measure and any level adjustment required and for the avoidance of doubt the Council in accepting this sum does not undertake any responsibility in connection with any required statutory undertakers works and excludes any statutory undertakers costs

2.8 Drawing 151955/A/06 is attached at Appendix NB-A of my proof of evidence.

2.9 In July 2017 the Council adopted their new Local Plan (CD-F9) and the subsequent Statement of Case issued by the Council made reference to the new adopted policies relevant to their reasons for refusal. In respect of reason for refusal 8, the Council’s Statement of Case states:

8. The proposed development, by reason of the type of cycle parking and its layout and location, would discourage the ownership and use of cycles as a sustainable form of transport, contrary to policies T1 (Prioritising walking, cycling and public transport), T3 (Transport Infrastructure) of the Camden Local Plan 2017.

2.10 The Camden Local Plan sets out the Council’s planning policies and replaces the Core Strategy and Development Policies planning documents (adopted in 2010). In respect of my evidence I shall assess the adherence of the appeal scheme proposals to the Adopted Local Plan policies T1 and T3 in place of superseded policies CS11, DP16, DP17 and DP18 stated in the decision notice.

- 2.11 In August 2017, Vectos was instructed by the Appellant to prepare evidence in support of the appeal (PINS reference APP/X5210/W/16/3165200) and specifically matters relating to Reasons for Refusal 8, 13 and 14.
- 2.12 Section 3 of my evidence sets out how the Appeal scheme complies with relevant parts of the policies set out within the National Planning Policy Framework (NPPF) and adopted Policies T1 and T3 of the Camden Local Plan 2017 and Camden Planning Guidance 7: Transport, insofar as these relate to the Statement of Case.
- 2.13 Section 4 of my evidence summarises key information from the TS, TPS and Response to the Council (CD-D6) which was produced by Vectos to support the planning application.
- 2.14 Section 5 of my evidence addresses the Reasons for Refusal 8.
- 2.15 Section 6 of my evidence concludes that the proposed development cannot be considered to be contrary to the requirements of the NPPF, in that in view of its car free basis, excellent public transport accessibility and provision for other sustainable modes of travel should be considered as sustainable development in the context of paragraph 14 of NPPF.

Matters Addressed in this Evidence

- 2.16 My Proof of Evidence therefore addresses the Council's Reasons for Refusal 8 by way of comprehensively demonstrating that the concerns raised have been adequately considered within the Appeal scheme and that there are no substantive highway or transport related reasons for not granting permission for this proposal.

3 RELEVANT POLICY COMPLIANCE

Introduction

- 3.1 This section of my evidence addresses the policy basis quoted by the Council for reasons for refusal 8, namely the National Planning Policy Framework (NPPF) and adopted Policies T1 and T3 of the Camden Local Plan 2017 and guidance contained in Camden Planning Guidance 7: Transport, insofar as these relate to matters of highways and transportation.

National Planning Policy Framework (NPPF)

- 3.2 The NPPF **(CD-F1)** identifies the core principles behind the planning for and delivery of sustainable development. My evidence refers to the key policies in relation to sustainability and key planning principles in relation to transport.
- 3.3 The key overarching policies of the NPPF are set out in paragraphs 6 to 10 in terms of defining sustainable development, and paragraphs 11 to 16 in respect of the delivery of sustainable development. Paragraph 17 sets out the Core Planning Principles of the NPPF. The policy extracts that I consider of particular relevance in respect of my evidence are set out below, and I have not included full paragraphs or bullet points where I consider the omission does not affect the meaning of the policy in highway accessibility, transport or sustainability.
- 3.4 Section 4 of the NPPF covers sustainable transport and how the impact of development should be considered from the transport perspective.
- 3.5 Paragraph 7 defines the three strands of sustainability, economic, social and environmental:
- 3.6 Paragraph 8 sets out how the three roles should be interpreted recognising that they are mutually dependant recognising that well-designed buildings and places can improve the lives of people and communities. The planning system should play an active role in guiding development to sustainable solutions.
- 3.7 Paragraph 9 sets out some of the positive improvements that should be sought by sustainable development.

- 3.8 Paragraph 10 identifies the need for 'local circumstances' to be considered for development in different areas. Effectively removing 'a one size fits all' approach to sustainability and allowing the benefits of a sites location to be recognised.
- 3.9 Paragraphs 11, 12 and 13 set out the basis of the 'plan led system' and the status and use of the NPPF within the plan-making and decision-taking process. This is then clearly set out in paragraph 14.
- 3.10 Paragraphs 15 and 16 set out the need for appropriate policies to be in place to enable the delivery of sustainable development through the development plan, as well as providing the basis for neighbourhood plans.
- 3.11 Paragraph 17 sets out core land-use principles that should be applied to plan-making and decision-taking, and bullet point 11 of 12 is the key transport related principle.
- 3.12 In terms of congestion, highway safety, accessibility to bus stops and schools, the NPPF states the following:

[Paragraph 30] Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.

[Paragraph 32] All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and sustainable access to the site can be achieved for all people; and
- Improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should

only be prevented or refused on transport grounds where the residual cumulative impacts of the development are severe.

[Paragraph 35] Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to: ...

- give priority to pedestrian and cycle movements and have access to high quality public transport facilities;
- create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones; and
- consider the needs of people with disabilities by all modes of transport.

3.13 Paragraph 32 makes it clear that there is no set level of provision that is adequate, by stating that consideration is '*depending on the nature of the site*'. It goes on to state that the focus is to '*reduce the need for major transport infrastructure*'. I consider this to clearly direct development, in a hierarchical manner, with preference to locations requiring only small or moderate scales of transport infrastructure improvement, such as the appeal scheme.

3.14 In summary of my Section 4, the proposed development is well integrated and connected with existing transport infrastructure as demonstrated within the Transport Statement (**CD-D6**). The site has a PTAL of 6a, making it one of the most accessible sites in the Borough with excellent public transport infrastructure connections, furthermore a Travel Plan statement (**CD-D6**) has also been submitted.

3.15 Therefore, I am of the view that the opportunities for sustainable transport have been fully taken into account within the Appellant's proposals. Accessibility to public transport and other services and facilities have been comprehensively reviewed.

3.16 All of these measures will encourage and promote, so far as they are able, sustainable travel opportunities to and from the Appeal scheme in accordance with the requirements of Paragraphs 30, 32 and 35 of the NPPF.

- 3.17 In conclusion of my review against the requirements of the NPPF, I do not consider there to be any remaining material deficiencies that are sufficiently severe as to outweigh the benefits of the development and I believe that the Appellant has proposed to take available opportunities to make the site more sustainable within its context, in accordance with the impetus of the NPPF.

London Borough of Camden Local Plan 2017

Policy T1 Prioritising walking, cycling and public transport

- 3.18 Camden Local Plan (CD-F9) Policy T1 relates to promotion of sustainable and accessible travel. T1 states that:

The Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.

Walking

In order to promote walking in the borough and improve the pedestrian environment, we will seek to ensure that developments:

- a. improve the pedestrian environment by supporting high quality public realm improvement works;*
- b. make improvements to the pedestrian environment including the provision of high quality safe road crossings where needed, seating, signage and landscaping;*
- c. are easy and safe to walk through ("permeable");*
- d. are adequately lit;*
- e. provide high quality footpaths and pavements that are wide enough for the number of people expected to use them. Features should also be included to assist vulnerable road users where appropriate; and*
- f. contribute towards bridges and water crossings where appropriate.*

Cycling

In order to promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will seek to ensure that development:

g. provides for and makes contributions towards connected, high quality, convenient and safe cycle routes, in line or exceeding London Cycle Design Standards, including the implementation of the Central London Grid, Quietways Network, Cycle Super Highways and;

h. provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within our supplementary planning document Camden Planning Guidance on transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development;

i. makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers;

j. is easy and safe to cycle through ('permeable'); and

k. contribute towards bridges and water crossings suitable for cycle use where appropriate.

Public Transport

In order to safeguard and promote the provision of public transport in the borough we will seek to ensure that development contributes towards improvements to bus network infrastructure including access to bus stops, shelters, passenger seating, waiting areas, signage and timetable information. Contributions will be sought where the demand for bus services generated by the development is likely to exceed existing capacity. Contributions may also be sought towards the improvement of other forms of public transport in major developments where appropriate.

Where appropriate, development will also be required to provide for interchanging between different modes of transport including facilities to make interchange easy and convenient for all users and maintain passenger comfort.

- 3.19 In my evidence I will set-out that the proposed development is well integrated and connected with existing high-quality transport infrastructure as demonstrated within the Transport Statement **(CD-D6)**.
- 3.20 The site has a PTAL of 6a, making it one of the most accessible sites in the Borough with excellent public transport infrastructure connections, furthermore a Travel Plan Statement has also been submitted **(CD-D6)**.
- 3.21 Georgiana Street between Royal College Road and St Pancras Way is part of a network signed or marked for use by cyclists on a mixture of quieter or busier roads. The local area more generally has very good provision for cyclists which include segregated cycle ways (on-carriageway, but segregated by fixed infrastructure) on Royal College Street and St Pancras Way. There is signage available for cyclists (e.g. on Georgiana Street, west of its junction with Royal College Street and also on Georgiana Street, west of its junction with St Pancras Way). The Grand Union Tow Path is also a cycle route.
- 3.22 In addition, the number of cycle parking proposed meets the standards set by the Council and offers a number of cycle storage locations within the development to suit differing needs of future residents. On this basis it is considered that there are no transport grounds to object to the proposed development under Policy T1.

Policy T3 Transport infrastructure

The Council will seek improvements to transport infrastructure in the borough. We will:

- a. not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure improvement projects; and*
- b. protect existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport, from removal or severance;*

- 3.23 Appendix 1 of the Local Plan identifies the 32 key transport projects across the Borough, ranging from HS2, Cross Rail, Night Tube Services through to Strategic Cycle Infrastructure. It is noted that Items 51-57 & 59 of Appendix 1 relate to cycle infrastructure schemes. Item 53 relates to:

53 : Camden and Kentish Town and Wider Area Scheme - Improving cycle permeability with a focus on east-west routes and extending the Royal College Street cycle route.

- 3.24 Policy T3 provides for the safeguarding of future strategic transport improvements across the Borough. In my evidence I am unable to find any aspect of the development which will cause harm to or prejudice the future delivery of the 32 stated key transport projects. To the contrary, I establish that a car free development within an area identified at scheme 53 for improved cycle permeability, will further increase the demand resulting in improved viability and cost benefit, of such a scheme. Therefore, there are no transport grounds to object to the proposed development under Policy T3.

Camden Planning Guidance 7 : Transport

- 3.25 The Local Plan 2017 confirms at Paragraph 1.13 confirms that the Council relies upon a number of other documents that provide advice and guidance on how it's planning policies will be applied for certain topics, areas or sites known as Supplementary Planning Guidance (SPG).

- 3.26 It is noted that at 1.13 it confirms that:

These documents do not have the same weight in decision making as Camden development plan documents but they are important supporting documents.

- 3.27 CPG7: Transport (**CD-F16**) is confirmed as being one of these documents.

- 3.28 Part 9 of CPG7 relates to cycling facilities and provides:

'guidance on meeting cycle parking standards in an effective way, so that cycle parking is convenient and secure, and users of a development are more likely to use bicycles to travel to and from the site.'

- 3.29 The guidance advises on the location, layout and design of off-street cycling facilities within development.

London Plan Chapter 6 : London's Transport

- 3.30 Camden Local Plan Policy T1 part h. states that the Council will seek development to provide for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) attached at Appendix NB-B of my evidence.

Section Summary

- 3.31 This section has detailed the transport aspects of policy cited in the London Borough of Camden's reason for refusal of the application to redevelop Bangor Wharf for residential purposes as well as overarching national policy on promoting and supporting accessible and sustainable development.
- 3.32 I have referenced evidence within my Proof of Evidence where appropriate to demonstrate that the cited policies provide no basis to object to the proposed development on transport grounds.

4 BACKGROUND

Site Location

- 4.1 A site location plan is contained at **Figure NB1** for reference.
- 4.2 The site location is as described at Paragraph 3.1 of the SoCG but in summary for the purposes of my evidence can be stated as located at Bangor Wharf, Georgiana Street, London, NW1 0QS. The site is bound by established residential units to the north and west, Georgiana Street to the south and the Grand Union (Regents) Canal to the east. The local area is characterised predominantly by residential dwellings although the site is located opposite a commercial centre, 'The Camden Studio', and close to public houses, such as The Prince Albert (60m west of the site) and The Constitution (45m east of the site).
- 4.3 Existing pedestrian and vehicular access is attained via Georgiana Street, which acts as the site frontage. The site has three crossovers on Georgiana Street, of which the middle crossover is blocked by a wall.

Site Accessibility

Walking & Cycling

- 4.4 **Figure NB2** shows a two kilometre walk catchment from the site.
- 4.5 The footways on Georgiana Street are of satisfactory width and condition. At the Georgiana Street junction with Royal College Street, there are flush kerbs and tactile paving to assist the mobility and visually impaired. At this junction, a zebra crossing with a pedestrian island separating the main carriageway from the cycle way is also located across Royal College Street. There is also a zebra crossing located on the northern arm of St Pancras Way at the St Pancras Way / Georgiana Street junction.
- 4.6 There is stepped access to the Grand Union Tow Path to rear of site from St Pancras Way. Ramped access to the tow path is provided from Baynes Street close to its junction with Royal College Street.

- 4.7 **Figure NB3** shows a five kilometre cycle catchment from the site.
- 4.8 According to the TfL London Cycle Guide 7 (2012/13), as shown in Appendix NB-C, the stretch of Georgiana Street between Royal College Road and St Pancras Way is part of a network signed or marked for use by cyclists on a mixture of quieter or busier roads.
- 4.9 The local area more generally has very good provision for cyclists which include segregated cycle ways (on-carriageway, but segregated by fixed infrastructure) on Royal College Street and St Pancras Way.

On-street cycle infrastructure – Junction of Georgina Street with Royal College Street



- 4.10 There is signage available for cyclists (e.g. on Georgiana Street, west of its junction with Royal College Street and also on Georgiana Street, west of its junction with St Pancras Way). The Grand Union Tow Path is also a cycle route.

On-street cycle infrastructure – Junction of Georgina Street with St. Pancras Way



- 4.11 The closest TfL cycle hire docking station is located on Camden Street at the junction with St Martins Close, 270m west of the site and its location is illustrated in **Figure NB4**. This docking station has capacity for a maximum of 18 cycles. There is also another docking station at the junction of Camden Road and Bonny Street, located approximately 350m north of the site. This docking station has capacity for a maximum of 45 cycles.

Public Transport

- 4.12 According to TfL, the site has a Public Transport Accessibility Level (PTAL) rating of 6a on a scale of 1a ('very poor') to 6b ('excellent'). This excellent local PTAL rating is met through a combination of bus, London Underground and Overground services for which further information is provided below. The TfL WebCAT PTAL output for the appeal site is attached at Appendix NB-D.

Bus

- 4.13 The closest bus stops are located on Camden Street ('Pratt Street' stop located approximately 230m west of the site) and Royal College Street ('Camden Road' stop located approximately 260m north of the site). Information on accessible bus services are shown in **Table 2.1**.

Table 2.1: Accessible Bus Services: Approximate Peak Frequencies (Mins)

No.	Destinations	Week	Sat	Sun
C2	Parliament Hill Fields – Royal College Street – Oxford Circus – Victoria Station	6 – 10	7 – 10	9 – 12
24	Hampstead Heath – Pratt Street – Westminster Station – Victoria Station – Grosvenor Road	4 – 8	5 – 8	6 – 10
27	Chalk Farm – Pratt Street – Baker Street – Notting Hill Gate – Kensington Olympia – Chiswick Business Park	6 – 10	7 – 10	11 – 13
29	Wood Green – Finsbury Park – Pratt Street – Trafalgar Square	3 – 7	4 – 8	4 – 8
31	Bayham Street – Swiss Cottage – Westbourne Park – White City Bus Station	4 – 8	5 – 8	5 – 8
46	Lancaster Gate – St John’s Wood – Royal Free Hospital – Royal College Street – St Bartholomew’s Hospital	6 – 10	10 - 14	15
88	Camden Gardens – Pratt Street – Piccadilly Circus – Vauxhall Park – Omnibus Clapham	6 – 8	6 – 10	10 - 13
134	Tottenham Court Road – Camden Town – Friern Barnet – Tally Ho Corner	3 – 7	6 – 10	6 – 9
168	Hampstead Heath – Euston Station – Elephant & Castle – Old Kent Road	7 – 8	6 – 7	10
214	Highgate School – Kentish Town – Royal College Street – Angel – Finsbury Square	6 – 10	6 – 10	10 - 12
253	Euston – St Pancras Way – Hornsey Road – Stamford Hill – Clapton Station – Hackney Central	4 – 8	5 – 8	6 – 10
274	Angel – Camden Town – Pratt Street – Baker Street – Lancaster Gate	7 – 10	7 – 10	5 – 8

London Underground

- 4.14 The closest London Underground station is Camden Town Station located 500m west of the site. This station is located in Zone 2 of the London public transport network. Camden Town Station is served by the Northern Line which provides direct access across London to destinations such as High Barnet, Archway, Edgware, Hendon Central, Bank, Waterloo, Balham and Morden.

Overground

- 4.15 The closest Overground station is located at Camden Road, approximately 260m north of the site. Overground services from this station provide direct access to a range of destinations inclusive of Stratford, Highbury & Islington, West Hampstead, Gunnersbury and Richmond.

Car Club

- 4.16 There are three car club bays in the vicinity of the site. City Car Club has a vehicle located 250m away from the site on Lyme Street. Alternatively, Zipcar has two car club spaces on Pratt Street at a location 350m south west of the site.

Proposed Scheme

- 4.17 The proposed ground floor site plan is provided at **Figure NB5**.
- 4.18 The proposed development that is the subject of this appeal is a residential-led mixed-use development comprising 46 residential units (Use Class C3) (18 x 1 bed, 19 x 2 bed and 9 x 3 bed), new office floorspace (Use Class B1a) (686 sq.m) with associated works to highways and landscaping following demolition of existing buildings. The proposed development is car-free.

Pedestrian Access

- 4.19 Access to the site will be secured for all pedestrians including the mobility impaired.
- 4.20 The primary access will be from Georgiana Street. This access will lead directly to respective entrance points for the uses on site. Residential plot A can be accessed directly from Georgiana Street. This access is at grade to assist the mobility impaired.
- 4.21 The remaining plots will access their respective pedestrian points via the site access gates (leading from Georgiana Street) which provide direct access to the undercroft and courtyard areas. The B1 uses will have separate entrances to the C3 residential units. There will be direct access to two of the B1 units (at blocks A and B) from Georgiana Street.

Cycle Parking

- 4.22 The residential element of the scheme will have 74 residential cycle parking spaces, 2 visitor cycle spaces and 8 business cycle spaces.
- 4.23 The cycle parking will be located in secure and covered storage areas which are accessed either via the building plot A pedestrian entrance which provides an onward route through to its own

cycle storage or through the courtyard to storage for building plots B and C. The business/office cycle parking will be provided in the courtyard, in accordance to standards.

Travel Plan

- 4.24 A Travel Plan Statement (TPS) **(CD-D6)** was prepared and submitted as part of the planning application. The TPS was prepared with reference to Transport for London's (TfL's) *Urban Planning & Construction: Travel Plans* webpages and the Council's *Camden Planning Guidance 7: Transport*.
- 4.25 TfL's guidance recommends that a travel plan statement should be prepared for C3 residential development of between 50 to 80 units. Therefore, the proposed development falls under the threshold. However, the Appellant opted to submit a TPS to demonstrate their desire to encourage future residents of the development to travel to the site sustainably, particularly by promoting active modes such as walking and cycling.

Section Summary

- 4.26 To summarise the development proposals:
- One Housing Group propose a development of 46 residential units and 604 sqm. of B1a office space;
 - The site is located in a highly accessible area of Camden;
 - The quantum of cycle parking proposed meets the standards set within Camden's own parking standards;
 - A variety of cycle parking types and locations is provided to cater for the differing needs of future residents;
 - A number of alternative options have been presented to the London Borough of Camden for consideration post submission; and
 - A Travel Plan Statement has also been submitted setting out the Appellants willingness and desire to encourage future residents to travel sustainably and particularly by active modes.

- 4.27 The Council has confirmed within their Delegated Officers Report dated 18 April 2016 (**CD-B2**), that:

“the quantum of cycle parking is acceptable for the residential provision”

- 4.28 In response to the Council’s queries on cycle parking provision within the scheme the Vectos response (**CD-D6**) sets out additional information that was submitted in order to provide for a range of options and alternatives providing a balance between the quantum and form of provision with a view to overcoming their proposed reason for refusal before the Decision Notice was issued.
- 4.29 The full Vectos response is provided at (**CD-D6**) but a summary of it is provided below.

Bangor Wharf Alternative Cycle Parking Options

- 4.30 The submitted ground floor plan (drawing 194/PL05) (**CD-E5**) shows how the proposal provides 76 residential cycle parking spaces in three separate, internal and secured cycle stores. There are also 8 spaces provided in the courtyard for business use.
- 4.31 Two of the internal stores are located close to or accessed via building entrances and the third is a short walk from the building entrance. This provides a choice of storage locations to suit differing cyclists’ needs and with the one that is located underground being accessed via steps with a wheeled ramp for cycles, the same as that is found on many of the access points to the canal towpath.
- 4.32 Provision of 74 residential spaces and 2 visitor spaces fully complies with Policy 6.9 and Table 6.3 of the London Plan 2016.
- 4.33 The proposal assumed use of semi-vertical stands as these are the most efficient in terms of space and are acceptable in many London boroughs but Officers commented that they are not supported in Camden, although no specific reason is given.
- 4.34 Vectos therefore developed four further options for storage, which have differing requirements for layout and therefore total numbers to be provided, and issued these to Camden for consideration during the planning application determination period.

- 4.35 The further submission by Vectos dated May 2016 considered these space/storage options for discussion with Camden. However, we were not given the opportunity to conclude negotiations on this matter prior to the refusal notice being issued. We are confident that agreement could have been reached with Officers had this been the case and that subsequently the proposed development could have been shown to encourage ownership and use of cycles as a sustainable form of transport, in accordance with Camden's Policy T1.
- 4.36 The following Table 4.1 and 4.2 provides a useful summary matrix of the overall proposed cycle parking quantum compared to the standards applied by the Camden Development Policies (Annex 2) and the London Plan Chapter 6 (Table 6.3) options and how they relate to the required quantum of provision.

Table 4.1 – Summary of Proposed Cycle Parking Provision vs Standards

	Residential		B1 Office	
	Residents	Visitors	Staff	Visitors
Appeal Scheme Proposal	74	2	4	2
	76 spaces		6 spaces	
LB Camden Development Policies - Annex 2	46	2.6	0.74	2
	49 spaces		3 spaces	
London Plan - Chapter 6 Table 6.3	74	1.15	4.6	1.4
	76 spaces		6 spaces	

Table 4.2 – Summary of Proposed Residential Cycle Parking Provision vs Vectos Options

	Josta	Sheffield	Semi-vertical	Camden Annex 2 Compliant?	London Plan Table 6.3 Compliant?
Option 1 – 76 spaces overall	18	0	58	Yes	Yes
Option 2 – 54 spaces overall	18	36	0	Yes	No
Option 3 – 71 spaces overall	18	8	45	Yes	No
Option 4 – 50 spaces overall	18	32	0	Yes	No

4.37 It is evident from Table 4.2 above that a range in quantum of cycle parking provision can be achieved subject to the mix of parking stand types used, within the constraints of the form of the buildings. The appeal scheme and Vectos Option 1 meets or exceeds the minimum quantum required by the London Plan and Camden’s Development Policy. Vectos Options 2 to 4 meet the requirements of Camden’s Policy but not the London Plan. In summary, for the appeal scheme there is a balance to be achieved between the quantum and form of the cycle parking but given my views on accessibility given in the subsequent chapter of my evidence, I do not feel that there is a case to sacrifice the quantum of provision over Camden’s preferred form of provision.

5 REASON FOR REFUSAL 8

- 5.1 The Decision Notice, dated 17th June 2016, stated the following reason for refusal on transport matters:

8. The proposed development, by reason of the type of cycle parking and its layout and location, would discourage the ownership and use of cycles as a sustainable form of transport, contrary to Policy CS11 (Promoting sustainable and efficient travel) and policies DP16 (The transport implications of development), (DP17) Walking, cycling and public transport and DP18 (Parking standards and limiting the availability of car parking) of the London Borough of Camden Local Development Framework Development Policies.

- 5.2 In July 2017 the Council adopted their new Local Plan (**CD-F9**) and the subsequent Statement of Case issued by the Council made reference to the new adopted policies relevant to their reasons for refusal. In respect of reason for refusal 8, the Council's Statement of Case states:

8. The proposed development, by reason of the type of cycle parking and its layout and location, would discourage the ownership and use of cycles as a sustainable form of transport, contrary to policies T1 (Prioritising walking, cycling and public transport), T3 (Transport Infrastructure) of the Camden Local Plan 2017.

- 5.3 At paragraph 3.25 of my evidence I establish that in respect of cycle parking provision, Camden Planning Guidance 7 : Transport (CPG7) provides the borough's guidance and interpretation of best practice.

CPG 7 Criteria

- 5.4 Reason for refusal 8 clearly establishes that in the view of the Council, the type and layout of cycle parking would be contrary to enabling sustainable and efficient travel to the development. As such it is necessary to review the guidance contained in CPG7 so as to establish the exact purposes and objectives of their design guide, as opposed to accepting it at face value.
- 5.5 Chapter 9 of CPG7 is with respect to cycling facilities, including cycle parking. At page 48 it states:

‘Cycle parking should be provided off-street, within the boundary of the site. Cycle parking needs to be accessible (in that everyone that uses a bike can easily store and remove a bike from the cycle parking) and secure (in that both wheels and the frame can easily be locked to the stand). Security is a critical concern in the location, design, enclosure and surveillance of all cycle parking.’

- 5.6 At page 49 of CPG7 the Council stipulates that three cycle stand types meet their accessibility and security criteria.

The Council recommends the use of either “Camden” or Sheffield for the provision of off-street cycle parking, as they meet the Council’s requirements in terms of accessibility and security, provided they are laid out correctly.

- *The “Camden” stand is a new form of Sheffield Stand, which is now used for all new cycle parking installed on Camden’s public highway. Developers are encouraged to use it in place of the Sheffield stand, although the Sheffield stand is still acceptable. The Council’s Public Realm and Transport team can advice on purchasing “Camden” stands as they are not as widely available as the Sheffield stand.*

- *The Sheffield Stand is the most common type of cycle stand used in the public highway. It is recommended for use along with Josta two tier cycle parking;*

Annex 1 provides more detailed guidance on the design and layout of “Camden”, Sheffield and Josta stands.

We are willing to consider other forms of cycle parking, however you must meet our accessibility and security requirements, details of which can be obtained from the Council’s Public Realm and Transport team. Generally, designs that require cycles be lifted into place or provide insufficient opportunity to lock the cycle will not be acceptable.

- 5.7 Whilst some of the language used within CPG7, including that above, would suggest the application of statutory design standards, in fact it relates to recommendations and guidance with the view of achieving the overarching objectives of accessibility and security. I would go so far as to say that it is implausible for the Council to believe that the use of their limited range of ‘approved’ cycle stands is the only available way in which to achieve the stated criteria of accessibility and security.

- 5.8 On the basis of demonstrating that the systems proposed by the appeal development meet with the accessibility and security criteria, I have considered each in turn below.

Accessibility

Design Criteria

- 5.9 The accessibility requirement is stated at paragraph 9.8 of CPG7 as being:
- '(in that everyone that uses a bike can easily store and remove a bike from the cycle parking)'*
- 5.10 The development proposals include for two design elements that the Council contest are not accessible; the gulley that allows cycles to be wheeled in and out of the basement storage area, and, their storage in a semi-vertical configuration.

Location

- 5.11 As already discussed at paragraph 4.30 of my evidence it is proposed to provide a total of 76 safe and secure cycle parking spaces at three separate locations within the development. This will provide for immediate accessibility to cycle parking from all parts of the development scheme.
- 5.12 Included within this cycle parking provision is a basement area for 45 cycles and because of design constraints is accessed via stairs and requires the use of semi-vertical cycle stands.

Stairway Gulley

- 5.13 It is my experience that cyclists are required to occasionally dismount and lift and carry their cycle over very short distances, have to push their cycles including up and down gradients, manoeuvre their cycles within confined areas and spaces. All of this occurs on a frequent basis, an everyday occurrence, and in my view, establishes the degree of physical ability referenced by paragraph 9.8 of CPG7.
- 5.14 Bicycle wheeling ramps (or gulleys) make stairs accessible to cyclists. They enable cyclists to go up or down staircases without having to physically carry their bike; thus, making stepped access accessible to cyclists.

5.15 Several designs of ramps are available including

- Stairs filled with concrete
- Metal ramps; and
- Metal channels

5.16 The stairway gulley to the basement cycle parking area allows for cyclists to wheel their cycle in and out of the storage area without the need to lift and carry it. The gulley would run for the length of the 9 steps and a level change of 1.55m over a length of 2.25m.

5.17 Cycle ramps have been installed at numerous developments and locations across London, including to my knowledge two new sites at Hampstead Heath for London Borough of Camden¹ and one at Kings Cross Central (2015/0368/P). Further, the London Borough of Camden installed metal wheel gulleys at Savernake Bridge in 2009 to aid cyclists using the bridge.

5.18 It is my view that the need and ability to push a cycle up and down a short ramp is not uncommon or abnormal for a cyclist. The gulley does not require the cycle to be lifted or carried but to merely steady it and push it either down or up the slope and in this instance over a relatively short length of the ramp. In my opinion this would not materially impact upon accessibility to the cycle storage area as I argue that use of the gulley ramp easily falls within the general physical ability of cyclists referenced at paragraph 9.8 of CPG7.

Storage Stand

5.19 Inset below is the *Design and layout of cycle parking: Sheffield and "Camden" cycle stands* reproduced from page 49 of CPG7.

¹ <http://cycle-works.com/product/wheeling-ramps/> 11.09.17

The Council recommends the use of either “Camden” or Sheffield for the provision of off-street cycle parking, as they meet the Council’s requirements in terms of accessibility and security, provided they are laid out correctly.

- The “Camden” stand is a new form of Sheffield Stand, which is now used for all new cycle parking installed on Camden’s public highway. Developers are encouraged to use it in place of the Sheffield stand, although the Sheffield stand is still acceptable. The Council’s Public Realm and Transport team can advice on purchasing “Camden” stands as they are not as widely available as the Sheffield stand.
- The Sheffield Stand is the most common type of cycle stand used in the public highway. It is recommended for use along with Josta two-tier cycle parking;

Annex 1 provides more detailed guidance on the design and layout of “Camden”, Sheffield and Josta stands.

We are willing to consider other forms of cycle parking, however you must meet our accessibility and security requirements, details of which can be obtained from the Council’s Public Realm and Transport team. Generally, designs that require cycles be lifted into place or provide insufficient opportunity to lock the cycle will not be acceptable.

- 5.20 The Council stipulate three compliant cycle stand products that meet their accessibility criteria; Sheffield Hoop, Camden Hoop and Josta two tier rack. It is in my view overly restrictive and limit their approval to only three product types when so many equally accessible and secure designs are readily available. It is my view that the criteria are overly prescriptive to a limited range of products, whereas a better approach would be to stipulate the criteria and objectives of a suitable cycle stand. That being: accessible and secure.
- 5.21 Whilst the Sheffield and Camden systems are ground based, the Josta two tier cycle parking rack requires the cyclist to lift the whole cycle and the supporting rack when loading the upper tier. I note that the Council considers the Josta two-tier system this to be sufficiently accessible and meeting their requirements.
- 5.22 The appeal development proposes 45 semi-vertical cycle stands in the basement and within a covered, safe and secure environment. This system requires the cyclist to place the front wheel in the channel and then to roll the cycle up to an inclined angle with the rear wheel resting in a curved channel that stops it from rolling backwards.
- 5.23 The use of semi-vertical cycle stands requires only minimal physical effort comprising lifting the front wheel in to the channel and rolling the cycle forward until it is secured in place. In

my opinion this falls within the general physical ability of cyclists referenced at paragraph 9.8 of CPG7.

- 5.24 For comparative purposes I will draw comparison of the physical effort of the semi-vertical stand with the Council's preferred two-tiered system. The latter requires the cyclists to lift the whole cycle off the ground and place it in to the stand. Once secured in the stand the cyclists is required to leverage the stand from a 45-degree angle to horizontal and then push the stand inwards. It is clear to see that this operation requires considerably greater physical effort than that for a simple semi-vertical stand.
- 5.25 It is informative to compare the operation of the two cycle stand types via video footage generally available on Youtube:

Josta and other two-tier system videos:

<https://www.youtube.com/watch?v=43VTkvpzGg8>

https://www.youtube.com/watch?v=_Sq0NoFa4Es

Semi-vertical system videos:

<https://www.youtube.com/watch?v=cpA3uwFOEVM>

https://www.youtube.com/watch?v=aUR9B3esj_8

- 5.26 It is apparent to the viewer that the Josta system requires significantly greater physical effort and time to place or remove a cycle when compared to the semi-vertical types and it has to therefore be argued that the former product is less accessible than the latter.

Security

Design Criteria

- 5.27 The security requirement of CPG7 is to be able to lock both wheels and the frame to the stand. The picture below, courtesy of cyclehoop.com, clearly shows a design whereby a semi-vertical bike stand can accommodate locking of the frame to the stand. The wheels are in contact with the stand, and as such, can be locked against it.

Semi-Vertical Cycle Stands with Security Locking Hoop



<http://www.cyclehoop.com/product/shelters-canopies/semi-vertical-shelter/>

- 5.28 It is my opinion that a semi-vertical stand of an appropriate standard and design, as illustrated by the cyclehoop.com design, would satisfy the Council criterion for security and as such be attached as a planning condition.

Section Summary

- 5.29 In summary, a significant amount of evidence has been collated in respect of cycle parking types, locations and accessibility.
- 5.30 The information collected and presented within my evidence confirms that:
- Cyclists regularly access local cycle routes using stairs;
 - The type of cycle stands proposed are used in developments elsewhere within Camden and other London Borough's;
- 5.31 CPG7 outlines two specific criteria which cycle parking must meet; accessibility and security. The security criteria are that bikes must be lockable at both wheels, and the frame. The accessibility criteria are that bikes are not to be lifted.
- 5.32 There is no reason to conclude that the type and location of the proposed cycle parking will discourage future residents from cycling. In addition:

- the Appellant has shown a desire to encourage uptake of sustainable, and particularly active, modes of travel by future residents; and
- the Council has confirmed that the quantum of cycle parking proposed is already in accordance with Camden's Local Plan.

5.33 The semi-vertical parking stands require no more effort to rack bikes compared to the Josta two-tier system.

5.34 My evidence concludes that the cycle parking provided is appropriate and acceptable for a development of this type in this location. On this basis I do not consider that there is any justification on transport grounds to object to the proposed development.

6 SUMMARY AND CONCLUSIONS

Summary

- 6.1 The proposed development is consistent with national and local policy being on a site that is accessible by all modes of transport. The site records a PTAL level of 6a.
- 6.2 The only issue raised in respect of transport by the London Borough of Camden in their reason for refusal, relates to cycle parking with the reason given that the type, layout and location of cycle parking would discourage the ownership and use of cycles as a sustainable form of transport which the Council state is contrary to their Policies T1 and T3 of the Camden Local Plan 2017.
- 6.3 I have established how the development proposals meet and exceed both NPPF and local policies relating to sustainable travel and development and that when considered in the whole, refusal on the basis of one part of that is disproportionate.
- 6.4 The proposed scheme incorporates a level of cycle parking provision that satisfies the requirements of the Council's standards in terms of numbers and offers a range of types and locations to cater for the differing needs and choices of future residents. This provision has been designed with the end user in mind to encourage cycle use by future residents.
- 6.5 The Appellant has offered a number of alternative cycle parking layout options for consideration by officers at the London Borough of Camden since the planning application was submitted.
- 6.6 A Travel Plan has also been prepared and was submitted as a stand-alone document as part of the planning submission. The Travel Plan offers a range of measures including those specifically aimed at increasing cycle uptake by future residents such as information on free cycle training, participation in Bike Week, Household Travel Planning, provision of Transport for London Cycle Guides.

- 6.7 My evidence demonstrates that the cycle parking provision proposed is suitable for the development in terms of the number of spaces provided and the type and location of cycle parking spaces provided and that the development seeks to encourage the uptake of cycling and sustainable travel wherever possible.
- 6.8 My supporting evidence has demonstrated the options available for provision of cycle parking that meets the standards set by The Council and how the development satisfies Policy T1 of the Camden Local Plan.
- 6.9 I fail to find reason why the appeal scheme would prejudice the delivery of key infrastructure projects across the Borough but do conclude that in terms of being a car free development, will make a contribution to the patronage and therefore cost effectiveness of such schemes, as are safeguarded by Policy T3 of the Camden Local Plan.
- 6.10 The London Borough of Camden conclude, in their reason for refusal that the proposed provision of cycle parking would discourage cycle use by future residents. My evidence is concurrent with this assumption.

Conclusions

- 6.11 In conclusion, it is my opinion that in view that the development is car free, has excellent public transport accessibility and has provision for other sustainable modes of travel, it should be considered as sustainable development in the context of paragraph 14 of NPPF.
- 6.12 There are no highway or transportation reasons why the proposed development could be considered to result in severe residual impacts and not be granted planning consent.
- 6.13 I therefore, respectfully, recommended that planning consent be granted at appeal.

7 SIGNED AFFIRMATION

- 7.1 It is confirmed that, insofar as the facts stated in this hearing statement are within my knowledge, I have made clear which they are and that I believe them to be true, and that the opinions expressed represent our true and complete professional opinion.
- 7.2 All facts which I regard as being relevant to the opinions expressed are detailed and attention has been drawn to any matter which would affect the validity of those opinions.
- 7.3 It is confirmed that my duty is to the Inspector and the Secretary of State which overrides any duty to those instructing, and that I have understood this duty and complied with it in the preparation of this Statement.
- 7.4 I confirm that I am neither instructed, nor paid, under any conditional fee arrangement by the Appellant.
- 7.5 I confirm that I have no conflicts of interest of any kind.
- 7.6 This statement complies with the requirements of the Royal Town Planning Institute, as set down in the revised Royal Town Planning Institute "Chartered Town Planners at Inquiries – Practice Advice Note 4".

Mr Neil Brant
Director, Vectos

Signed: _____ *NDBrant* _____

Dated: _____ *23rd October 2017* _____