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To: LB Camden
Job Title: 13 Fitzroy Street
Job No: 2018-3896
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Date: August 2019

Subject: Transport Note: Disabled Parking

Introduction

1. Caneparo Associates are appointed by Workspace Group ('the Applicant') to provide traffic and transport advice associated with 13 Fitzroy Street ('the Site'), in the London Borough of Camden (LBC).
2. The Site consists of an existing office building at No. 13 Fitzroy Street with vehicular access via Cleveland Mews to the rear. The Site provides 11,415sqm (GIA) of office floorspace (Class B1) alongside 10 off-street car parking spaces (including 1 disabled parking space).
3. The planning application seeks the extension and refurbishment of the building in order to provide an additional 197sqm of office floorspace (Class B1) alongside a qualitative upgrade to the workspace in general. This involves the removal of all existing car parking spaces.
4. A Transport Statement was submitted in March 2019 and has subsequently received comments from the Highways Officer (in *italics* below) regarding disabled parking. This Transport Note provides a response to these comments.

Disabled Parking

"The site currently accommodates 10 car parking spaces. The proposal would result in the removal of all car parking spaces. Policy T2 supports the loss of non-essential car parking. However, the proposal to remove some existing disabled parking spaces raises concerns. I appreciate James Hammond gave pre-application advice on this matter. However, I believe he was not aware that the site currently accommodates disabled parking spaces.

The number of such spaces is unclear. I suggest you ask the applicant to provide further commentary on the justification for the loss of disabled parking spaces. I am not sure this would be supported by the Council's access officer. I also suggest you ask the applicant to suggest alternative locations nearby where blue badge holders could park (i.e. on-street parking bays on Fitzroy Street)".

Pre-application Advice

5. The proposals remove all off-street car parking from the existing car park, accessible via Cleveland Mews. This includes the removal of 1 disabled parking space which is currently available upon request via the facilities management team. The removal of all car parking within this highly accessible location is considered a significant benefit of the scheme in terms of promoting sustainability and reducing car use in a busy area of Central London. It is also noted that the Site is within walking distance (850m) of Tottenham Court Road Station which provides step-free access to the London Underground network.

6. Further to this, during pre-application discussions (dated 13/09/2018), the Case Officer (Jaspreet Chana) provided specific advice regarding future disabled parking provision within the development:

"Having spoken to highways they have said that removing any general parking onsite would be welcomed. In regards to disabled parking, if the applicants do not wish to provide any then we have no concerns from a policy requirement perspective".

7. While it is recognised that pre-application advice is not binding, it is clear that the response received had fully considered the details of the development, including existing disabled parking. The response raises no concern with a future situation whereby no off-street car parking (including disabled parking) is provided for this development.

Camden's Local Plan

8. Regardless, Camden's Local Plan (2017) states under Policy T2 – Parking and car-free development – that:

"The Council will limit the availability of parking and require all new developments in the borough to be car-free. We will:

- a) *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;*
 - b) *limit on-site parking to:*
 - i) *spaces designated for disabled people where necessary, and/or*
 - ii) *essential operational or servicing needs”.*
9. The facilities management team have confirmed that the current disabled parking space receives a request to park on a very infrequent basis, and is in fact used more by employees wishing to park their electric car near to the plug socket than for disabled parking. The disabled parking space is not currently used by an employee for their travel to / from work. Therefore, it is considered that the provision of a disabled parking space is not a necessary requirement to the function of an office building for disabled people, and that the low level of demand for disabled parking could be provided elsewhere within close proximity of the Site.

Available On-street Disabled Parking

10. Building upon this, an assessment of available on-street disabled parking spaces has been undertaken, based on a circa 300m walking distance from the development i.e. 4-5 minutes' walk. The following 8 disabled parking spaces were identified:
- Howland Street: 80m south-east of the Site (requires multiplex development to finish);
 - Fitzroy Street: 120m north of the Site;
 - Whitfield Street: 150m north-east of the Site;
 - Grafton Way (west): 220m north-east of the Site;
 - Grafton Way (east): 270m north-east of the Site;
 - Cleveland Street: 270m south-west of the Site; and
 - Whitfield Street (x2): 300m north of the Site.

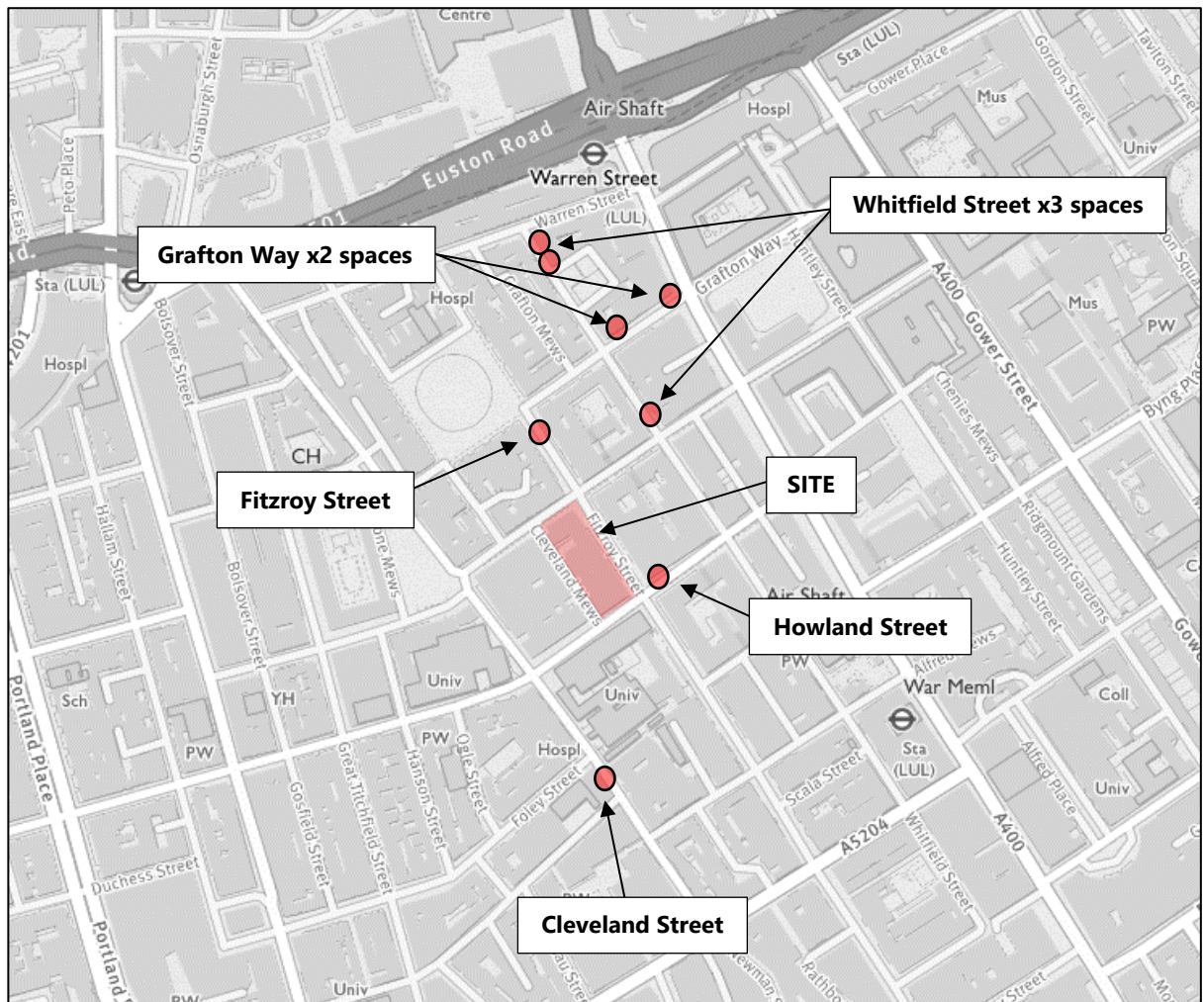


Figure 1: Disabled Parking Bay Locations (On-street)

11. **Figure 1** highlights 8 disabled parking spaces within a 300m walking distance from the Site. It is considered that these disabled parking spaces are capable of accommodating any future demand that may arise from the proposed office development for disabled parking.
12. The Site is located within Camden’s Green Badge Zone which not only requires drivers to have a blue badge to park within disabled parking spaces, but also to:
 - Live in Camden in the green badge area
 - Work in Camden (full or part-time) in the green badge area

- Study full- or part-time in Camden in the green badge area.
13. Within the Green Badge Zone, blue badge holders may legitimately park within blue badge bays or paid for parking bays with payment only, and not within resident permit bays.
 14. Moreover, it is consider that the parking restrictions imposed on this area may deter blue badge holders from outside the borough, from parking within this area. This may result in the disabled spaces being available to employees with a green badge.

Summary

15. This Transport Note has demonstrated that there has been limited use of the current single off-street disabled parking space, Moreover, this note highlights that there is a sufficient provision of disabled parking spaces within 300m of the development site. In light of this, we consider that any required disabled parking can be accommodated by the current provision of disabled spaces within close proximity to the site. Furthermore, this aligns with comments received from LB Camden as part of pre-application discussions as well as being in accordance with Local Plan Policy T2.