

A Planning Application by
ST MUNGO'S

In respect of
**Arches 30-38, Prowse Place,
LONDON BOROUGH OF CAMDEN**

Transport Statement

February 2020



DOCUMENT SIGNATURE AND REVIEW SHEET**Project Details**

Project Title:	Arches 30-38, Prowse Place, LONDON BOROUGH OF CAMDEN		
Project No.:	1911-047	Report No.:	1911-047/TS/01B
Client:	St Mungo's		

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Date	19/02/2020	19/02/2020	20/02/2020

Document Review

Revision	Date	Description	Checked By
A	25/02/20	Minor Amendments	TAM
B	27/02/20	Minor Amendments	TAM

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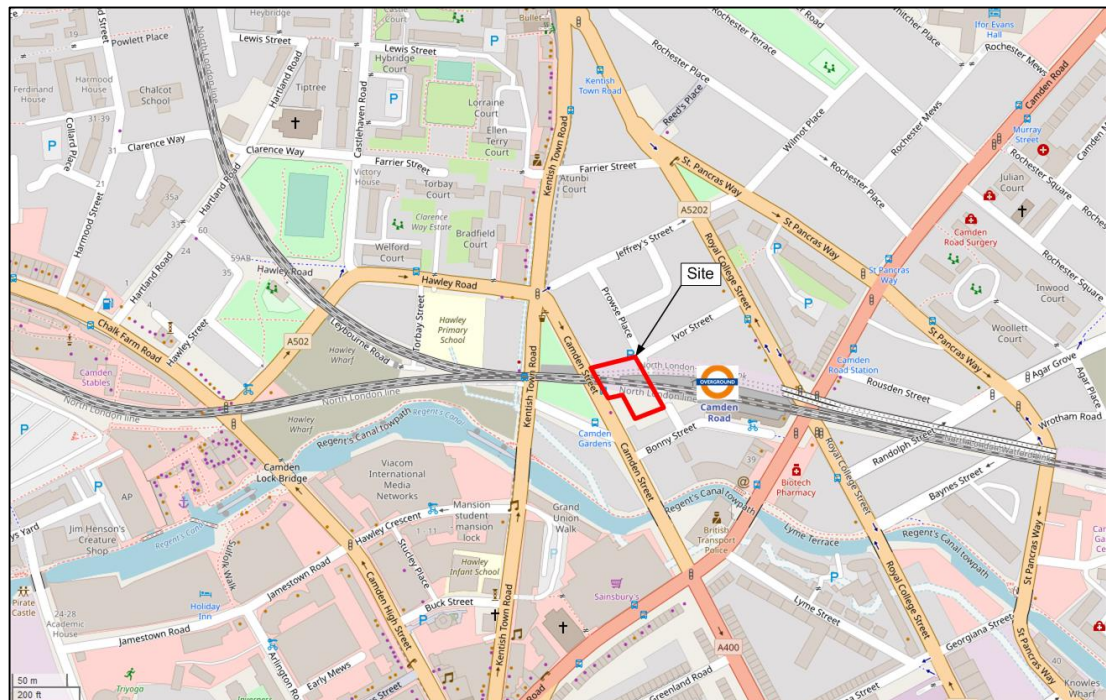
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1 INTRODUCTION

- 1.1 St Mungo's has appointed Transport Planning Associates (TPA) to provide transport planning consultancy services for a proposed change of use at Arches 30-38, adjacent to 5 Prowse Place and 156 Camden Street, formerly 3a Prowse Place (Site), in Camden Town. **Figure 1.1** below shows the Site location, which falls within the London Borough of Camden (LBC).

Figure 1.1 Site Location Plan



Source: © OpenStreetMap

Note: Indicative Site boundary

- 1.2 TPA prepared this report in relation to a planning application that St Mungo's will submit to LBC for the:

“Change of use of site from Sui Generis to a mixed D1, B1 and A1 use and other associated works including minor alterations to the external facades to accommodate new plant and the provision of landscaping and cycle parking.”

- 1.3 The Arch Company, the freeholder of the Site, sought pre-application advice from LBC in October 2019. The response (**Appendix A**) highlighted, in terms of transport impact, that:

“[...] the Council would seek car-capped development for any change of use permitted, meaning that the new businesses/uses could not apply for parking permits within the CPZ and that numbers of parking bays on site are capped at existing. This would be secured by s106 legal agreement in accordance with policy T2 Parking and car-free development. There will also be a need to ensure that suitable cycle parking provision is made

within the site in accordance with London Plan standards for the relevant land use types.”

Report Structure

1.4 TPA prepared this Transport Statement to consider the highway and transport aspects of the proposed change of use as part of a suite of documents supporting the above planning application. It will set out the baseline position, describe the scheme, and consider its impact on the surrounding highway network. The remainder of this report is set out as follows:

- **Chapter 2** – Transport Baseline Conditions;
- **Chapter 3** – Development Proposals;
- **Chapter 4** – National and Local Planning Policy;
- **Chapter 5** – Trip Attraction; and
- **Chapter 6** – Summary and Conclusion

2 TRANSPORT BASELINE CONDITIONS

The Site

- 2.1 The application Site relates to a row of double height arches beneath a London Overground line, which runs east to west across the Site towards Camden Road station, and associated front and rear parking/courtyard areas. The existing floor space in the arch totals 1,355 m² Gross Internal Area across the ground and mezzanine levels. The railway arches are linked internally at the ground floor level. **Appendix B** includes the red line boundary, together with the existing and proposed layout.
- 2.2 The Site was previously occupied by a single tenant (Warren Evans) who operated on site for a period of at least 10 years before going into receivership in 2018. The Site has remained vacant since this point and its lawful use is a Sui Generis use, composed of a mixture of retail show rooms (Class A1), office space (Class B2) as well as some storage space (Class B8) as approved under permission LPA Ref: 2008/4000/P granted in March 2009.
- 2.3 The main access points to the Site are two sets of gates leading onto Prowse Place. In addition, there is a doorway access that leads onto Camden Street (A400) on the southwest side of the Site, although this currently provides emergency escape only.
- 2.4 The Site includes a large area of hardstanding that can be used for car parking. However, the area does not contain marked spaces and parking is informal and uncontrolled.
- 2.5 The residential units along Prowse Place provide the northern boundary of the Site, Prowse Place bounds the Site to the east, commercial units to the south, and Camden Street (A400) to the west.

Pedestrian and Cycle Accessibility

Walk

- 2.6 Prowse Place provides the main pedestrian access to the Site via an approximately 1.0 m wide footway along the east of the Site that runs between Jeffrey's Street and Bonny Street. West of the Site, the footway connects with Camden Street (A400). The Bonny Street footways south of the Site are approximately 2.0 m wide. The Jeffrey's Street footways north of the Site are approximately 1.5 m wide. There are footways on both sides of the carriageway along Prowse Place, Jeffrey's Street, and Bonny Street.
- 2.7 Bonny Street provides pedestrian access to Camden Road station and the bus stop on Camden Gardens via Camden Street (A400). Jeffrey's Street provides pedestrian access to Kentish Town Road (A400) and Prince of Wales bus stops. From the Jeffrey's Street fire

- access, the A502 provides access to the Camden Market bus stop on Camden High Street (A502).
- 2.8 Bonny Street provides access to Camden Road and Camden Town stations via Camden Street (A400) and Camden Road (A503).
- 2.9 There are controlled pedestrian crossings across each of the roads that form the junction adjacent Jeffery's Street fire access. A controlled pedestrian at the junction between Camden Road (A400) and Camden Street (A503) provides access to Camden Gardens from the Site. Controlled pedestrian crossings at the Camden Town station provide access to the station from the Site. There are pedestrian crossings on all arms of the A502 junction west of the Site.
- 2.10 In relation to acceptable walking distances, Manual for Streets (MfS) offers the following guidance in Section 4.4 "The walkable neighbourhood":

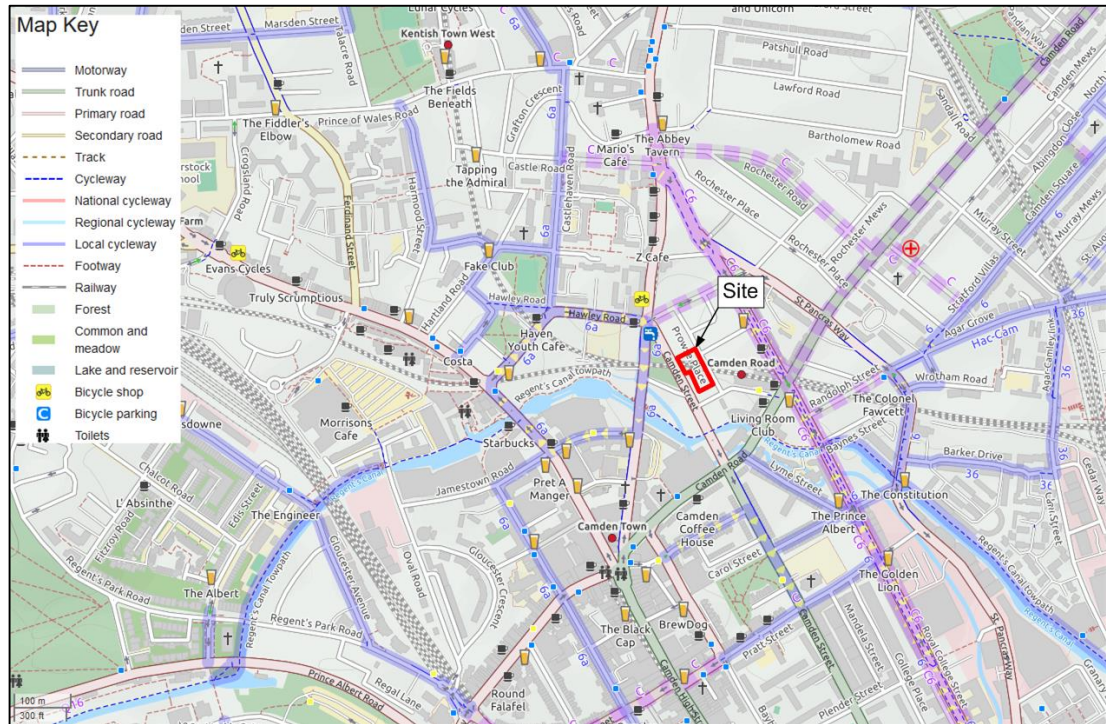
"Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and ... walking offers the greatest potential to replace short car trips, particularly under 2 km. MfS encourages a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance of most residents."

- 2.11 Residential areas within Camden Town, Kentish Town, and Chalk Farm are within a desirable or acceptable walking distance of the Site.

Cycle

- 2.12 The nearest cycle route is Cycleway 6, running along Jeffery's Street and Royal College Street (A5202) to the east, which provides a link to Gospel Oak and Elephant and Castle. London Cycle Network (LCN) 6a, running along Kentish Town Road (A400) to the west, provides a link to Highgate and Parliament.
- 2.13 Sheffield stands at the junction between Camden Street (A400) and Jeffrey's Street to the north provide cycle parking near the Site. **Figure 2.1** below shows the cycle infrastructure near the Site and demonstrates that it is highly accessible by cyclists.

Figure 2.1 Cycle Network Plan



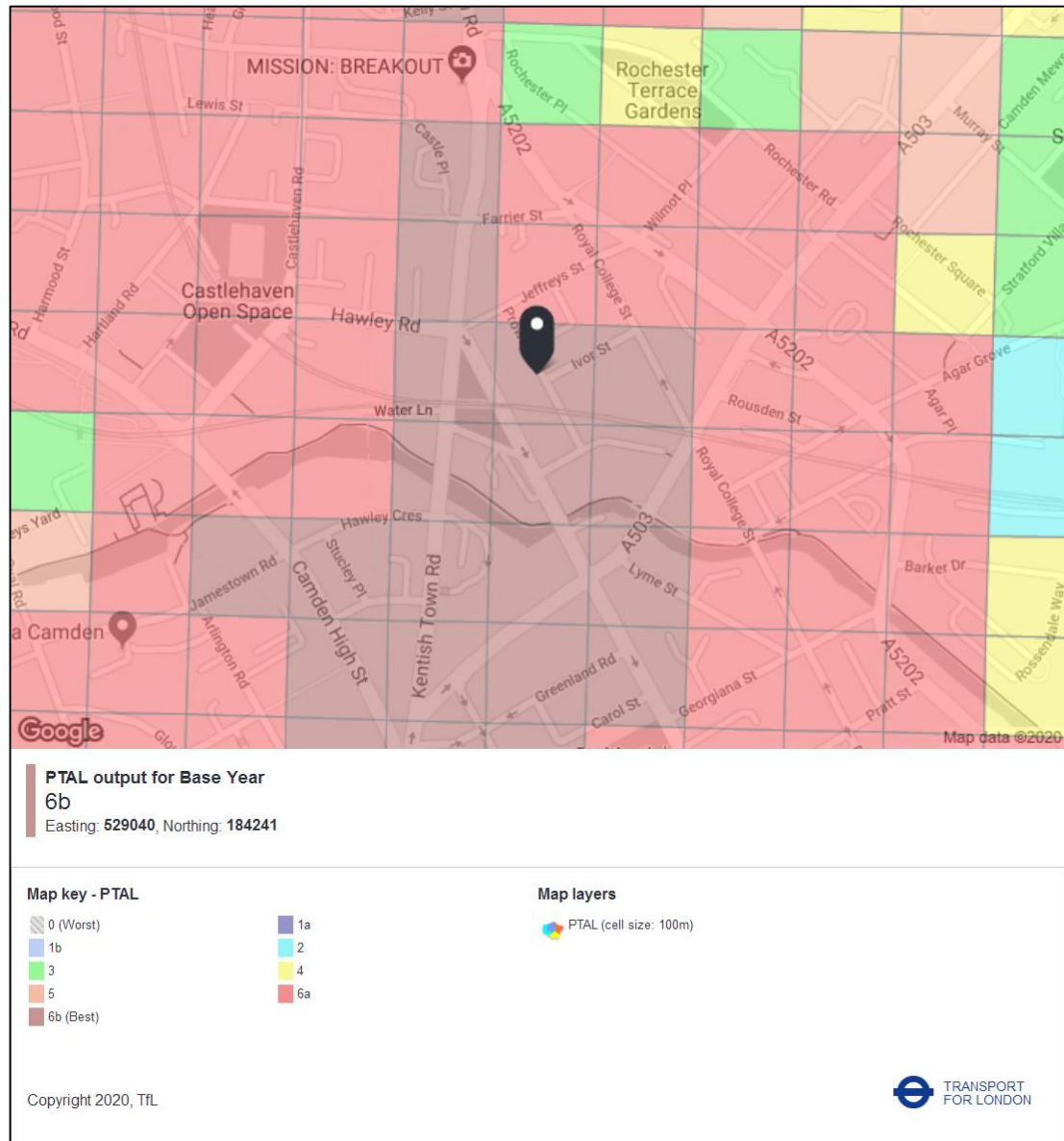
Source: © OpenStreetMap

Public Transport Accessibility

Public Transport Accessibility Level

- 2.14 The Public Transport Accessibility Level (PTAL) rating of a site within London denotes the degree to which public transport services serve the site, via a score between 0 (no accessibility) and 6a/6b (excellent accessibility). PTAL is a function of the distance and frequency of bus services available within 640 m and underground/railway services available within 960 m.
- 2.15 The PTAL at the Site is 6b (**Figure 2.2**), which is a reflection of its many bus and underground services (Bus and Rail Services below) and confirms its excellent public transport accessibility.

Figure 2.2 PTAL



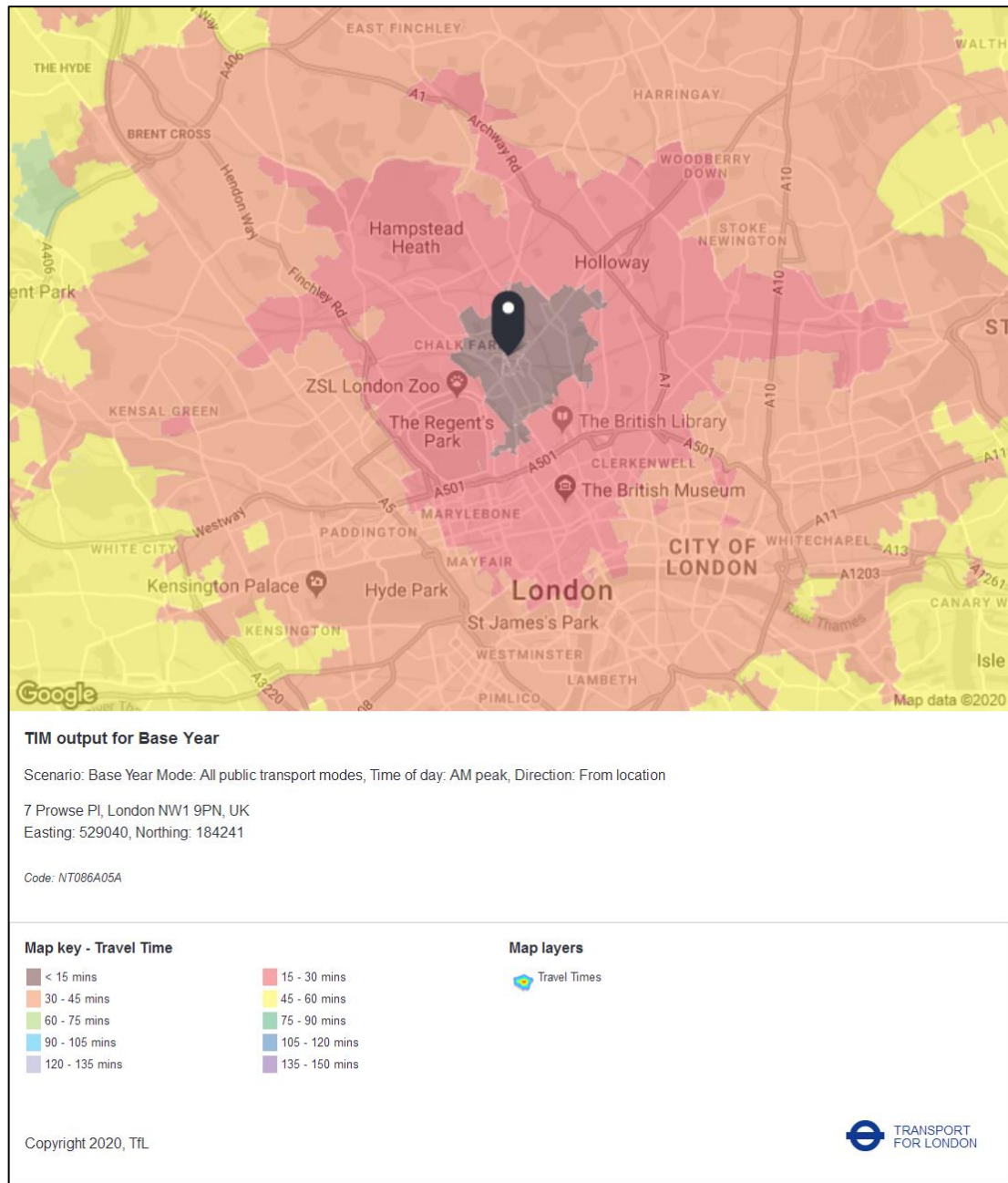
Source: © Transport for London

Transport for London Time Mapping

2.16 A significant limitation of PTAL is that while it shows an area has a good level of bus and/or train services, it does not indicate how useful those services are with regard to the desired destination. Of more use is the time taken to travel from a given point by public transport. Transport for London (TfL) provides data relating to morning peak hour journey times via its online service WebCAT.

2.17 **Figure 2.3** below shows the Time Mapping analysis for the Site and demonstrates it is accessible within 15-30 minutes from many residential and commercial areas in north and central London.

Figure 2.3 Transport for London – Time Mapping



Source: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat>

Bus Services

2.18 The closest bus stops to the Site are Camden Gardens and Camden Road station, 215 m (three minutes) walk south of the Site, and Prince of Wales Road, Camden Market, Kentish Town Road (A400) 500 m (six minutes) west. **Table 2.1** below details the bus routes that service the Camden Gardens bus stop (D), Camden Road station bus stops (F, H, G), Prince of Wales Road bus stop (KM), Camden Market bus stop (CQ), and Kentish Town Road (A400) bus stop (KP) and summarises their frequency.

Table 2.1 Bus Services

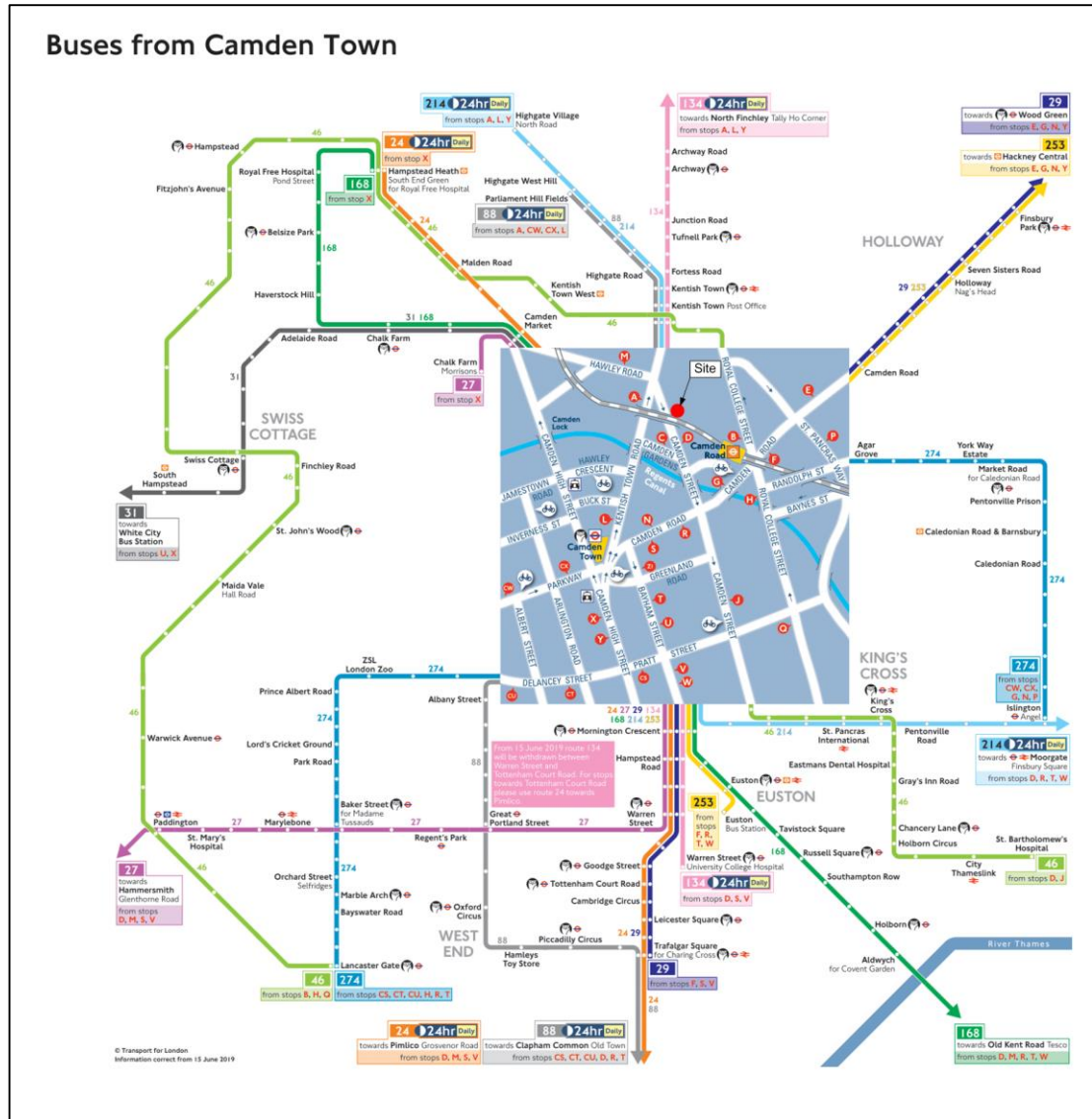
Route Number	Route	Peak Frequency (mins)		
		Weekday	Saturday	Sunday
24	Grosvenor Road to Royal Free Hospital	8-12	9-12	11-13
27	Glenthorne House to Chalk Farm	6-10	8-12	
29	Trafalgar Square to Wood Green	4-8	5-8	7-8
31	Camden Town Station to White City	9-11	8-12	9-12
46	St Bartholomew's Hospital to Lancaster Gate	8-12	9-11	15
88	Omnibus Clapham to Parliament Hill Fields	6-9	6-10	9-13
134	University College Hospital to Tally Ho Corner	6-10	7-10	9-11
168	Dunton Road to South End Green		8-12	10-13
214	Finsbury Square to Highgate Village		6-10	11-13
253	Euston Bus Station to Hackney Central	5-8	5-9	6-10
274	Lancaster Gate Station to Islington	10-13	9-13	9-12
393	Lea Bridge Roundabout to Chalk Farm Morrisons		11-13	15

Source: © TfL

Notes: Based on services available at Camden Gardens, Camden Road station, Prince of Wales Road, Camden Market, and Kentish Town Road (A400)

2.19 **Table 2.1** above shows that 12 routes service the closest bus stops to the Site. These connect to local areas such as Grosvenor Road and Glenthorne House, as well as to London Underground and Overground stations and a number of local residential areas and commuter opportunities found within central and north London. **Figure 2.4** below shows the Buses from Camden Town Spider Map.

Figure 2.4 Buses from Camden Town / Camden Road Spider Map



Note: © TfL

Rail Services

- 2.20 The Site is within an approximately 150 m (two minutes) walk from Camden Road Overground station and a 500 m (seven minutes) walk from Camden Town Underground station.
- 2.21 Camden Road station is on the Stratford to Clapham Junction branch of the London Overground. Camden Town station is the part of the Northern Line and all branches converge at this location. The stations provide regular services to a number of local destinations and residential areas as well as south and central London. Collectively the services result in approximately a 2 to 3-minute frequency during the peak periods. **Table 2.2** below summarises the Overground/Underground services available.

Table 2.2 Summary of TfL Services at Camden Road/Camden Town

Train Destination	Service Frequency (mins)		
	Weekdays	Saturday	Sunday
Clapham Junction*	9	15	20
Stratford*	9	5	8
Morden**	5	5	8
Kennington**			
High Barnet**	6	6	8
Mill Hill**			
Edgware**	3	3	6

Source: © TfL

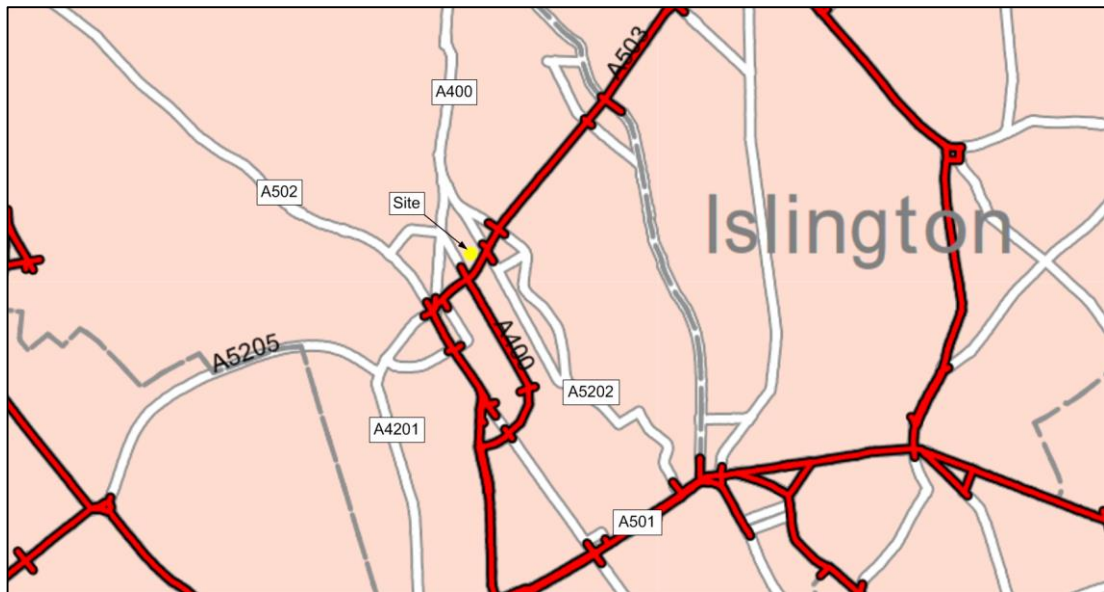
Note: *available from Camden Road

**available from Camden Town

Local Highway Network

- 2.22 Prowse Place is a single-carriageway lit road, subject to a 20 mph speed limit, provides vehicle access to the Site, and connects with the Overground station via Bonny Street to the south. Prowse Place narrows to single-lane for a limited section under the railway. It commences at a priority junction northwest of the Site with Jeffery's Street and terminates at a priority junction to the southwest with Bonny Street.
- 2.23 Bonny Street, south of the Site, is also part of the 20 mph zone. It has on-street parking along its entire length. After the first 50 yards, it is subject to a 17 t weight restriction.
- 2.24 Bonny Street connects to Camden Street (A400), which provides a link to Archway. North of the Site, Camden Street (A400) continues past the junction between A400 and A502 as Kentish Town Road (A400). Further north Royal College Street (A5202) merges with Kentish Town Road (A400). The A400 continues north after splitting into Fortess Road (A400) and Highgate Road (B518). The A400 provides strategic connections to Victoria Embankment, Euston, and Islington.
- 2.25 The A400, Camden Street, continues to the south as Oakley Square past the junction with the B512. **Figure 2.5** below shows the Site in the context of the wider network and demonstrates that the Site is well connected in terms of the strategic highway network.

Figure 2.5 Local Highway Network and Red Routes

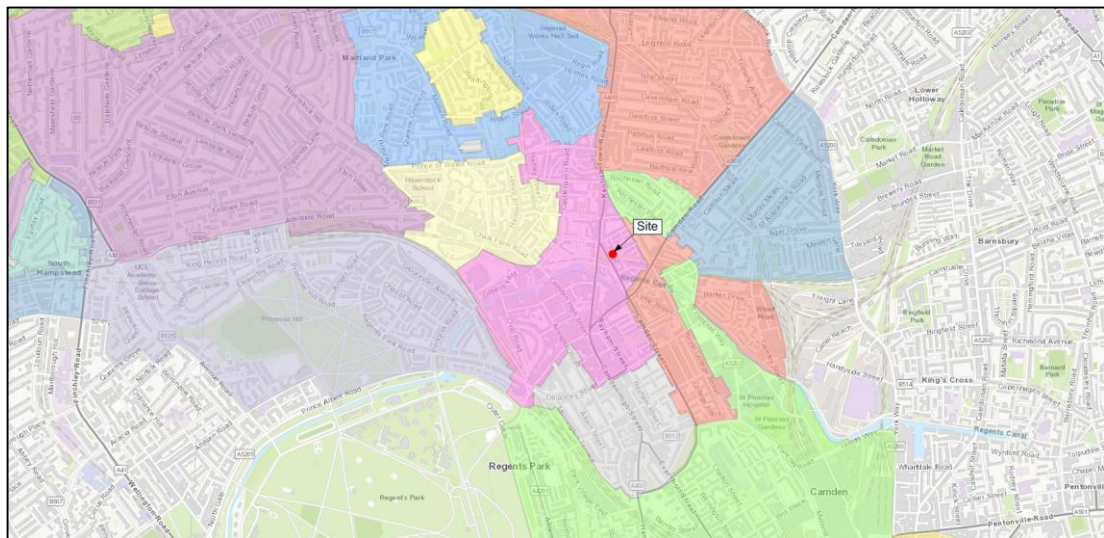


Source: © TTL

Parking

2.26 The Site within a Controlled Parking Zone (CPZ) that restricts parking to resident permit holders only on the adjacent residential roads, from Monday to Friday between 08:30 and 18:30, Saturday 09:30 – 17:30, and Sunday 09:30 – 17:30. **Figure 2.6** below shows the Site in relation to the CPZ in Camden. The Site is in zone CA-F(n), shaded pink below.

Figure 2.6 CPZ near the Site



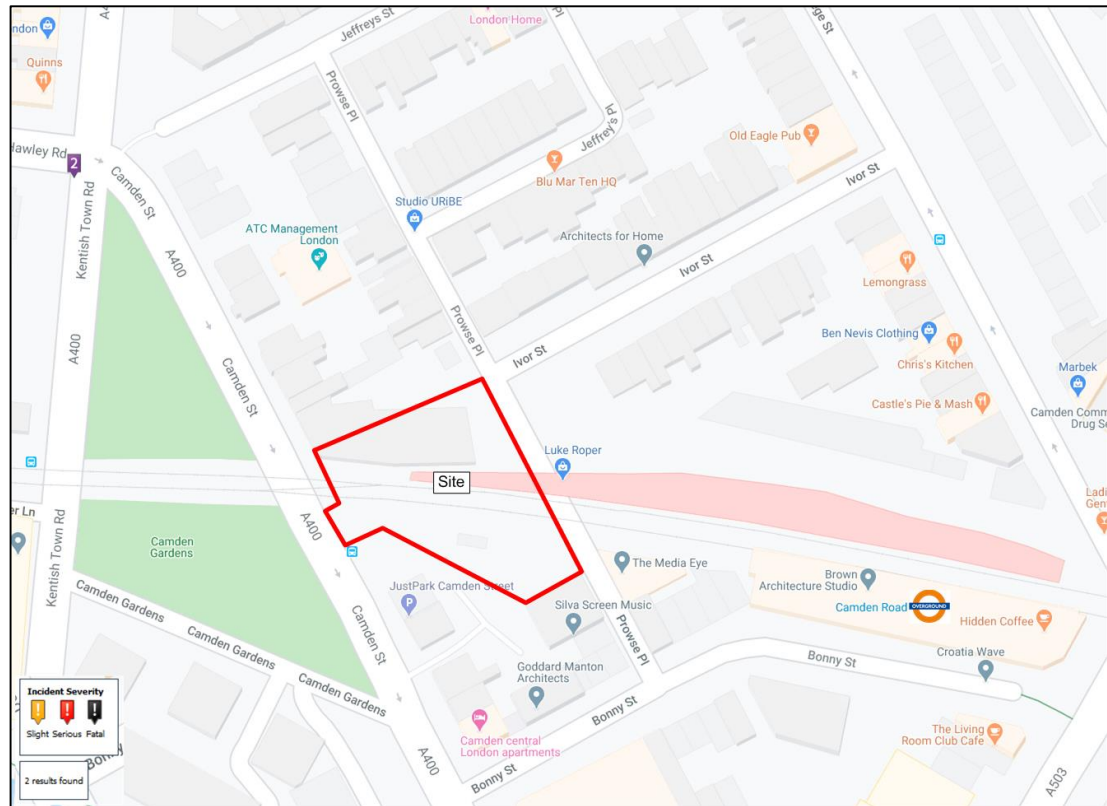
Source: © LBC

Road Safety

2.27 This report includes Personal Injury Collision (PIC) data from CrashMap for the most recent five years up to 2018 near the Site. CrashMap compiles data collected by the police, when a

road traffic collision occurs on British roads results in injury, into an easy to use format showing each collision on a map.

Figure 2.7 CrashMap Data



Source: © CrashMap

Note: Indicative Site boundary

- 2.28 The search revealed that no serious or fatal PICs occurred along Prowse Place over the five-year period. In the wider area, within 150 m, CrashMap recorded two serious PICs at the junction between the Jeffrey's Street junction with the A400 and the A502.
- 2.29 Overall, in light of the quantum and location of collisions, and the predicted trip attraction associated with the proposals, we consider that there are no existing road safety issues near the Site likely to be exacerbated by the proposed change to mixed D1, B1, and A1 use.

3 DEVELOPMENT PROPOSALS

- 3.1 The development comprises a change of use of three railway arches (1,200 m² Gross Floor Area) at Arches 30-38 from a previously occupied Warren Evans (Sui generis, with a mix of A1, B2, and B8 uses) to a St Mungo's Recovery College (mixed D1, B1, and A1 use). No additional floor space is proposed to the existing and minor external alterations to the unit include the provision of new plant units for air conditioning and services. The Site is within the Jeffery's Street Conservation Area but the railway arches are not listed buildings.
- 3.2 Facilities to be provided within the Recovery College include classrooms, computer suites, event/ teaching/ mediation rooms, offices, staff facilities and storage. Part of the unit will also provide a Construction Skills facility and an ancillary Class A1 use is sought to enable the potential sale of plants grown as part of St Mungo's Putting Down Roots, a horticultural training programme.
- 3.3 The St Mungo's Recovery College will operate Monday – Friday with no weekend working. Clients are anticipated to attend between 10:00 and 15:00. Some staff will arrive as early as 07:30 in the Construction Skills section but will be finished between 15:00 and 16:00. All the office and event/staff training for the Recovery College element will work normal office hours Monday – Friday.
- 3.4 When the Site is occupied at full capacity, a maximum of 51 staff and 92 visitors could be on site at any one time (refer to Planning Statement for breakdown of services and staff/visitor numbers). However, St Mungo's anticipate the day to day actual staff figures will be around 30 with 30 – 40 visitors. These daily figures are comparable to numbers experienced at St Mungo's existing Rushworth Street Recovery College that is being relocated as part of the proposals. This report uses the actual staff/visitor numbers as part of our assessment.
- 3.5 The existing floor space in the arch totals 1,355 m² Gross Internal Area across the ground and mezzanine levels. The railway arches are linked internally at the ground floor level. **Appendix B** includes the proposed Site plan. Of the 1,020 m² Net Internal Area (NIA), approximately 533 m² will be D1 use, 232 m² B1, and the remaining 255 m² will be a mix of B1 and D1 use. The A1 use will be ancillary and utilise the external courtyard, therefore it is unallocated in terms of the floor space.

Car and Cycle Parking

Car Parking

- 3.6 The scheme will be car-free, in line with pre-application advice. However, a disabled bay, Construction Skills parking bay, and loading delivery bay will be provided on Site. Staff and visitors will travel to the Site via public transport, cycling, or walking. In accordance with Policy T2 Parking and car-free development, a S106 legal agreement would prevent new businesses/uses applying for parking permits within the CPZ.

Cycle Parking

- 3.7 The scheme will provide six covered and secure Sheffield bike stands (12 cycle parking spaces), in the southern courtyard for staff.
- 3.8 The scheme will provide four Sheffield bike stands (8 cycle parking spaces), in the southern courtyard for visitors.

Access

- 3.9 The scheme proposes retaining the existing pedestrian, cycle, and vehicle access arrangement from Prowse Place and opening the Camden Street (A400) access to pedestrians.

Refuse Collection, Servicing, and Deliveries

- 3.10 The existing refuse collection and servicing arrangements for the previous uses will remain unaltered.

4 NATIONAL AND LOCAL PLANNING POLICY

4.1 This chapter will provide the transport planning policy and guidance background for the scheme. The policy and guidance documents utilised include:

- The National Planning Policy Framework (February 2019);
- The London Plan (March 2016);
- The Intend to Publish London Plan (December 2019); and
- Camden Local Plan (July 2017).

National Planning Policy Framework (2019)

4.2 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and the application thereof. It provides a framework within which local authorities can produce locally prepared plans for development.

4.3 Defining sustainable transport mode:

“Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport” (annex 2, pg.72).

4.4 Regarding sustainability:

“The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs” (para 7).

4.5 Regarding travel plans and transport assessments and statements:

“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed” (para 111).

4.6 Regarding parking standards:

“Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport... In town centres, local authorities should seek to improve the quality of parking so that it is

convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists” (para 106).

4.7 Considering development proposals:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe” (para 109).

4.8 **Chapter 2** shows the Site is in a sustainable location. The scheme will provide parking in line with local standards and TPA prepared this report to assess the potential impact and it demonstrated that it would not be severe. Therefore, the scheme is in line with the guidelines, recommendations, and prescriptions included in the NPPF.

London Planning Policy

The London Plan (March 2016)

4.9 The Greater London Authority (GLA) adopted the London Plan in 2011 with alterations in 2013, 2015, and 2016. The London Plan (March 2016) concerns all 32 London boroughs and the Corporation of London, sets out policies to accommodate the expected growth of the city in a sustainable way covering the period until 2031, and states the maximum car and minimum cycle parking standards.

4.10 Enabling sustainable modes of transport supports the Mayor's vision. The London Plan (March 2016) states that London should be:

“A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system which actively encourages more walking and cycling, makes better use of the Thames and supports delivery of all the objectives of this Plan” (para 1.53).

4.11 The Mayor intends to better integrate transport and development by:

“encouraging patterns and nodes of development that reduce the need to travel, especially by car...

seeking to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand...

supporting development that generates high levels of trips at locations with high levels of public transport accessibility...

promoting walking by ensuring an improved urban realm” (Policy 6.1).

Intend to Publish London Plan (December 2019)

- 4.12 In December 2019, the Mayor of London issued to the Secretary of State his intention to publish the London Plan. The current London Plan (2016) is still the adopted Development Plan. However, the Intend to Publish London Plan (December 2019) indicates the direction of future development policy within the city. Therefore, the Intend to Publish London Plan should be a material consideration as part of planning decisions.
- 4.13 Hence, the proposed development should seek to place itself within the constraints of both policy frameworks.

The Current and Intend to Publish London Plan Parking Standards

- 4.14 **Table 4.1** below summarises the maximum car parking standards from the London Plan.

Table 4.1 Car Parking Standards

Use	London Plan	Intend to Publish London Plan
D1	N/A	N/A
B1	1 per 600 m ²	1 Disabled Bay
A1	1 per 40 m ²	

Source: © GLA London Plan

- 4.15 The scheme complies with this standard by providing one disabled space.
- 4.16 The London Plan also sets out the following minimum cycle parking standards. **Table 4.2** below and **Table 4.3** below summarise these.

Table 4.2 Long-stay Cycle Parking Standards

Use	London Plan	Intend to Publish London Plan
D1 – College	1 space per 4 FTE staff + 1 space per 20 FTE students	

Source: © GLA London Plan

Table 4.3 Short-stay Cycle Parking Standards

Use	London Plan	Intend to Publish London Plan
D1 – College	1 space per 7 FTE students	

Source: © GLA London Plan

- 4.17 The London Plan (March 2016) and Intend to Publish London Plan (December 2019) require 10 long-stay and six short-stay cycle parking spaces. The scheme complies with this standard by providing 12 long-stay and eight short-stay cycle parking spaces.

Local Policy

London Borough of Camden

4.18 LBC adopted the Camden Local Plan in July 2017. It sets out the Council's planning policies and replaces the Core Strategy and Development Policies planning documents (adopted in 2010). It ensures that Camden continues to have robust, effective, and up-to-date planning policies.

4.19 The Local Plan conforms to national and regional documents. The LBC document sets out parking standards within Policy T2 Parking and car-free development. The policy states:

"...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..."

limit on-site parking to:

i. spaces designated for disabled people..."

4.20 The Camden Local Plan requires development to provide cycle parking facilities exceeding the minimum standards the London Plan (March 2016) outlines. The Camden Planning Guidance on transport (March 2019) states LBC seeks 20% over and above the London Plan (March 2016). Since the London Plan (March 2016) and the Intend to Publish London Plan (December 2019) require 10 long-stay and six short-stay cycle parking spaces, an additional 20% would be 12 long-stay and 7 short-stay cycle parking spaces.

5 TRANSPORT IMPACT

- 5.1 The change of use from Sui generis (with A1, B2, and B8) to a Recovery College (mixed use D1, B1, or A1) of a Site with no car parking in a PTAL 6b area is unlikely to result in any noticeable impact on the highway network.
- 5.2 Future staff and visitors will be able use sustainable modes of travel to reach the Site and this is expected (and driven) by the lack of staff/visitor parking. **Chapter 2** demonstrates the Site is near cycle routes and bus/underground/rail services. The Site represents an excellent location for a car-free development (in line with pre-application requirements).
- 5.3 Therefore, the Site is unlikely to attract vehicular traffic, except for occasional disabled users and operational movements, which are likely to be very small and in any case comparable to (or smaller than) previous use (beds retailer).
- 5.4 Impact on bus, London Underground, and Overground services would be immaterial due to the scale of the development and the existing provision is likely to accommodate any increased demand.

6 SUMMARY AND CONCLUSION

Summary

- 6.1 St Mungo's has appointed Transport Planning Associates to provide transport planning consultancy services in relation to a proposed change of use at Arches 30-38, Prowse Place, Camden Town. The Site comprises three railway arches underneath a London Overground line. The scheme comprises a change of use from a previously occupied Warren Evans (Sui generis, with A1, B2, and B8) to mixed use (D1, B1, and A1) Recovery College.
- 6.2 The Site is in a sustainable location, near two London cycle routes. It is in an area of excellent public transport accessibility (PTAL 6b), approximately 150 m from Camden Road Overground station and associated bus stops and within a short walk from Camden Town station (Northern Line). This report has not identified any road safety issues in the surrounding highway network.
- 6.3 The scheme intends to utilise the existing pedestrian, cycle, and vehicle access arrangements off Prowse Place, with additional pedestrian access from Camden Street.
- 6.4 The scheme will be car-free, except for the provision of one disabled parking space, one Construction Skills parking space, and one loading/delivery bay for operational needs. Staff and visitors will travel to the Site via public transport, cycling, and walking. To support the proposed development, the Site will also provide cycle parking spaces in accordance with the standards.
- 6.5 In consideration of its car-free nature, the Site is predicted to result in no vehicular trips, except for the occasional disabled users and operational movements.

Conclusion

- 6.6 In conclusion, the proposed development will be compliant with national, regional, and local policies. It is unlikely to result in a severe impact and therefore there are no transport or highways grounds for application refusal.

APPENDIX A



Planning Solutions Team
Planning and Regeneration
 Supporting communities
 Directorate
 London Borough of Camden
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 N1C 4AG

Date: 30.10.2019
Our ref: 2019/4689/PRE
Contact: John Diver
Direct line: 020 7974 6368
Email: john.diver@camden.gov.uk

Luke Sumnall
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By email

www.camden.gov.uk/planning

Dear Luke,

Re: Arches 30-38, Site adj to no.5 Prowse Place and 156 Camden Street, London, NW1 9PN (formerly 3a Prowse Place)

Thank you for submitting a pre-planning application enquiry for the above property. This advice was informed by a site visit completed on the 9th October 2019 as well subsequent discussions with relevant colleagues.

1. Site description & background

- 1.1. The application site relates to a row of double height arches beneath the London Overground line that runs east-west across the site towards Camden Road station as well as associated front and rear parking/courtyard areas. These are labelled Arches 30 – 38 on submitted plans, although they currently remain a single planning unit. The main access points in and out of the site are two sets of metal gates leading onto Prowse Place. There is a small doorway access that leads onto Camden Street to the south western side of the site though this currently provides emergency escape only.
- 1.2. The application site is located within the Jeffrey's Street Conservation Area and within the Camden Town business improvement district. The Council's registers also highlight the site as being at risk of contaminated land issues. The site is covered by a number of Article 4 Directives which have been applied to removed rights such as those that permit a change from office (B1) to residential (C3) without express consent. There are no trees protected by tree preservation orders on the application site. The site also abuts the Kentish Town Neighbourhood boundary area to its western boundary.
- 1.3. The entire site was occupied by a single tenant (Warren Evans) who operated on site for a period of at least 10yrs before going into receivership in 2018. The site has remained vacant since this point. The site retains its lawful Sui Generis use, composed of a mixture of retail show rooms, office space as well as some storage space, as established in a committee report / decision from 2008. During our site visit it was noted that the property remains in the same layout as per this previous use.

2. Proposal

- 2.1. Advice is requested in relation to flexible options for a change of use across the entire property to aid its marketing. The exact development proposed is as follows:

Change of use of site from Sui Generis to flexible permission to include business, retail or non-residential institution (Use Classes B1/A1/D1)

- 2.2. Such a flexible permission, would permit the site to be used for each of these options individually, in its entirety, or any combination of those uses across the site. Such a flexible consent would apply for a period of 10yrs, after which point the uses in place would become the permanent lawful use of the site in perpetuity.
- 2.3. No detailed plans or areas schedules have been provided and as such the following advice is based on the principles of land use only. No consideration of external alterations can be provided at this time. Following a request for at least the total area of the site, you pointed to the 2008 committee report that states that the combined GIA of the site was 634sqm and so this is assumed to remain accurate for the purposes of this advice.

3. Summary of advice:

- 3.1. Although the existing lawful use of the site remains in a sui generis use class, it is in fact constituted of a number of separate uses that includes employment floorspace (i.e. use class B1). The Council would seek to protect this employment floorspace as a minimum and, as such, I would advise that officers would not support the proposed flexible options proposed. This would chiefly be a result of the potential loss of employment floorspace combined with amenity and transport concerns arising from the use of the whole site for either use class A1 or D1 purposes.
- 3.2. Notwithstanding the above, I would advise that each of the proposed uses would likely be permissible on site on a restricted basis. I would also advise that the use of the entire premise for B1 purposes would likely be supported, subject to suitable provision for Small and Medium scale Enterprises (SMEs).

4. Justification

- 4.1. As set out above, given that a flexible permission is sought, officers would need to be satisfied that the 'worst case' scenario in terms of options for implementation remains satisfactory in order to be accepted. In this instance, this would represent the entirety of the site being used for each one of the three options proposed. These options are discussed below.

Proposed B1 use class

- 4.2. The B1 use class would permit a range of business uses including offices (B1a), R&D (B1b) or light industrial (B1c). A prerequisite of all B1 uses is that they can be carried out in any residential area without causing detriment to the amenity of the area, meaning that heavier/more intensive uses would be discounted from this class.
- 4.3. The existing lawful use of the site contains a fair proportion of floorspace that would be best described as offices, principally at mezzanine levels as well as in some areas at ground floor levels. The supporting text to policy E1 (Economic Development) of the Camden Local Plan makes clear that Sui Generis uses that are similar to B1/B2/B8 uses will be regarded as 'employment floorspace' for policy purposes (para.5.5). No detailed plans have been submitted as part of this request and so no commentary on exact floor areas can be provided, however, policy E2 (Employment sites) would seek the retention of this area as a minimum, unless it was convincingly demonstrated that there was no longer a demand for such a use. This requirement would be based on maintaining the existing quantum of employment floorspace, though this could be redistributed across the site as part of a mix of uses rather than being retaining in its existing locations if this was preferable.

- 4.4. Policy E1 seeks to direct new office development into designated centres or the Central Activities Zone. Whilst the site is located outside of either of these designated areas, it is noted that it is well suited for employment use. It remains highly accessible (PTAL of 6b – highest possible) and just a short walk from the designated centres of Camden Town and Kentish Town. Owing to its industrial heritage, it also features tall floor to ceiling heights and would be less suited to sensitive uses such as housing. However, it is also noted that the site is surrounded by residential development to the north and east and that the main access into the site is down a narrow residential street. As such, the use of the entire site for B1 purposes is also likely to be supported by officers, subject to more detailed assessment of the resulting operational impacts (i.e. servicing and transport assessments) as well as ensuring suitable provision for SMEs.
- 4.5. Were permission sought for the use of the entire site for B1 purposes, then you would need to demonstrate that the site could be let flexibly to a range of sizes of enterprise. It would be critical to demonstrate that the space could be broken down into much smaller units that might attract smaller businesses, or that entire or even several arches could be combined to allow for larger tenants. Any such permission would be expected to increase employment opportunities for local residents, including training and apprenticeships, meaning that an Employment and Skills Plan would likely be sought as an s106 legal agreement. Depending on the exact quantum of floor areas across the whole site, it may also be the case that a provision of affordable workspace would be expected to be secured by s106 legal agreement. These obligations are discussed further in the Employment sites and business premises CPG (2019).

Proposed A1 use class

- 4.6. As discussed above, the ground floor in the majority of arches was previously used as retail showroom space for the previous bed company. Policy TC1 (Quantity and location of retail development) of Camden Local Plan seeks to focus new shopping and related uses in Camden's designated growth areas and existing centres, having regard to the level of capacity available in these locations. The site is not within any designated centre or frontage, and is sited in a recessed and fairly concealed location which does not receive high levels of footfall. I would advise that the use of the entirety of the site for retail purposes is unlikely to be supported at application stage as this would not be regarded as a suitable location for a new, major retail centre. It is also noted that the levels of coming and goings necessary to support a fully retail use of the site in terms of deliveries and customers would be significant and that this could give rise to amenity issues to neighbouring residential properties.
- 4.7. Notwithstanding the above, it is evident that the previous occupiers operated a comparison retail use at ground floor levels successfully for a number of years. Given that this use is established, re-providing the existing amount of retail on site as part of a mixture of other uses would not be objectionable as it would effectively be no different to the previous arrangement. This would have to be capped at a maximum floorspace of the existing quantum.

Proposed D1 use class

- 4.8. The D1 Use Class is broad and contains a range of potential uses from health centres to exhibition halls to nurseries. Given this wide range of potential uses, it is difficult to gauge the potential operational impacts that might arise from the introduction of such a use on site. Needless to say, in a similar fashion to an A1 use, the levels of coming and goings and site activity associated with the use of the entire site for 'open' D1 purposes would mean that it would be unlikely to be accepted given the proximity to residential properties. Whilst it might be possible to secure a permission for a specific end user within the D1 use class subject to appropriate mitigation measures (i.e. a museums or exhibition halls), such an open ended and vague consent would be resisted. That being said, a capped proportion of a specified D1 use

proposed as part of a mix of uses across the whole site could be considered appropriate, though this would need much more supporting information to be submitted at application stage and adequate mitigation.

Requirements for all proposed uses

- 4.9. Regardless of which uses are eventually sought, you should be aware that the Council would seek car-capped development for any change of use permitted, meaning that the new businesses/uses could not apply for parking permits within the CPZ and that numbers of parking bays on site are capped at existing. This would be secured by s106 legal agreement in accordance with policy T2 Parking and car-free development. There will also be a need to ensure that suitable cycle parking provision is made within the site in accordance with London Plan standards for the relevant land use types.
- 4.10. In addition, assuming that the change of use would involve a 'deep refurbishment' (i.e. all fixtures and fittings and servicing and power equipment replaced), then there will be a need to demonstrate how the development minimises the effects of climate change and meets the highest feasible environmental standards that are financially viable during construction and occupation. Such details and measures would need to be submitted and secured as part of an Energy and Sustainability Plan in accordance with policy CC1 Climate change mitigation and CC2 (Adapting to Climate Change). This applies to all development over 500sqm. For advice regarding the preparation of these documents, please see the Sustainability CPG (link can be found in appendix to this report).

5. Conclusion

- 5.1. I would advise that an 'open' flexible permission to include use classes A1/B1/D1 would be unlikely to be supported by officers owing to the lack of clarity relating to the resulting operational impacts, potential loss of employment floorspace, potential impacts upon neighbouring communities as well as inappropriate siting.
- 5.2. The site is considered best suited to employment uses, and so this would be the option that would be most likely to be supported at application stage. A mix of uses that could include some small provision of (specified) D1 and/or retail provision (with quantum not to exceed existing) could also be supported subject to adequate reporting and mitigation. This would have to be as part of a predetermined split of uses across the site though and not as part of an open, flexible consent.
- 5.3. Please see appendix for a full list of relevant planning policies and guidance as well as the planning history of the site.
- 5.4. It is likely that that a proposal of this size would be determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers. For more details click [here](#).

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter or the attached document please do not hesitate to contact me direct.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

John Diver

Senior Planning Officer
Regeneration and Planning
Supporting Communities
London Borough of Camden
Telephone: 02079746368
Web: camden.gov.uk

APPENDIX

Relevant planning history

The following planning history is relevant to this site:

9500265: Planning permission was refused on the 12/07/1996 for the 'Retention of stables for temporary period'

2008/4000/P: Planning permission was granted on the 23/03/2009 for the 'External alterations to the facades and associated yards for the existing manufacturing and showroom use (Use classes A1, B2 and B8).'

2008/5425/C: Planning permission was granted on the 23/03/2009 for the 'Demolition of structures within the north and south yards and demolition of the entrance annexe on the Camden Street frontage of the building (Use classes A1, B2 and B8'

Other sites:

PEX0200596: @ 11-14 Ivor Street: Planning permission granted for refurbishment of 5 rail arches and insertion of mezzanine floors, insertion of windows to the north elevation of Arches 1, 2 and 3 with louvre panels to Arches 2 and 3, provision of replacement boundary wall with planters and gates, erection of single storey LEB sub-station and bin store on the forecourt, provision of brick wall on relocated boundary with the rear of nos. 15, 16 and 17 Ivor Street, and refurbishment of the entrance from Prowse Place, in connection with the use of the site for purposes within the B1 Use Class.

Relevant policies and guidance

- [National Planning Policy Framework \(2019\)](#)
- [London Plan \(2016\)](#)
- Emerging [New London Plan \(draft\) 2019](#)
- LB [Camden Local Plan \(2017\)](#)
 - G1 - Delivery and location of growth
 - C1 - Health and well-being
 - C2 - Community facilities
 - C3 – Cultural and leisure facilities
 - C5 - Safety and security
 - C6 - Access for all
 - E1 - Promoting a successful and inclusive Camden economy
 - E2 - Employment premises and sites
 - A1 - Managing the impact of development
 - A4 - Noise and vibration
 - D1 - Design
 - D2 - Heritage
 - CC1 - Climate change mitigation
 - CC2 - Adapting to climate change
 - CC3 - Water and flooding
 - CC4 - Air quality
 - CC5 - Waste
 - TC1 - Quantity and location of retail development

- TC3 - Shops outside of centres
- TC6 - Markets
- T1 - Prioritising walking, cycling and public transport
- T2 - Parking and car-free development
- T3 - Transport infrastructure
- T4 - Sustainable movement of goods and materials
- DM1 Delivery and monitoring
- **Kentish Town [Neighbourhood Plan](#) (2016)**
- **[Camden Planning Guidance](#):**
 - Access for All CPG - March 2019
 - Amenity CPG - March 2018
 - Community uses, leisure and pubs CPG - March 2018
 - Design CPG - March 2019
 - Developer Contribution CPG - March 2019
 - Employment sites and business premises CPG - March 2018
 - Energy efficiency and adaptation CPG - March 2019
 - Planning for health and wellbeing CPG - March 2018
 - Town centres and retail CPG - March 2018
 - Transport CPG - March 2019
- **Jeffrey Street [Conservation Area Statement](#)**

Planning application information

If you submit a planning application which addresses the outstanding issue detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application (assuming no external alterations / extensions are proposed):

- Completed form – [Full Planning]

Plans

- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red.
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'

Supporting Information / Reports

- Design and access statement
- Planning Statement
- Transport Statement / Assessment
- Noise Impact Assessment (if replacement of any external plant is required)
- Energy and Sustainability Statements
- The appropriate fee (based on sqm)

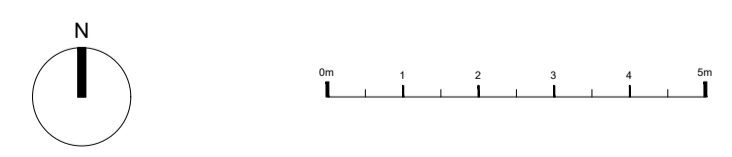
Please see [supporting information for planning applications](#) for more information

APPENDIX B

SCHEDULE OF ACCOMMODATION		
ROOM:	AREA:	ACTIVITY:
G.01	34m ²	Event Space - Room 1
G.02	37m ²	Event Space - Room 2
G.03	143m ²	Heart Space
G.04	24m ²	Meditation Room
G.05	39m ²	Office
G.06	45m ²	Office
G.07	19m ²	Staff Room
G.08	49m ²	Office
G.09	20m ²	Server Room
G.10	47m ²	Construction Skills
G.11	70m ²	Construction Skills
G.12	20m ²	Construction Skills Store



1 Ground Floor GA Plan
1:100 @ A1



General Notes: This drawing is to be read in conjunction with all other drawings, structural, mechanical & electrical engineer's drawings. Written dimensions take precedence over scales. All dimensions to be confirmed on site. All details and dimensions are approximate and subject to change. All details are indicative of design intent. Specialist design subcontractors are to develop and co-ordinate final details for the contract administrators comments. All installations are to be in accordance with manufacturers' recommendations, any discrepancy is to be notified to the contract administrator immediately. These notes do not absolve the responsibility for the accuracy of the existing building survey upon which these drawings are based.	Notable Hazards & Risks: N/A	Level: N/A	Notes: Site Address: 30-38 The Arches, Prowse Place NW1 9PH	Notes:	Rev: PL1	Date: 12.02.20	Description / Comments: FOR COMMENT	Drn: NF	Chk: KC	Project Name: Prowse Place Recovery College	Drawing Title: Ground Floor GA Plan Proposed
										Client: St Mungos	Job No.: 0541
Scale: 1:200@A3 (1:100@A1)										Scale: 1:200@A3 (1:100@A1)	Scale: 1:200@A3 (1:100@A1)
Scale: 1:200@A3 (1:100@A1)										Scale: 1:200@A3 (1:100@A1)	Scale: 1:200@A3 (1:100@A1)
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PLANNING

KC+A