

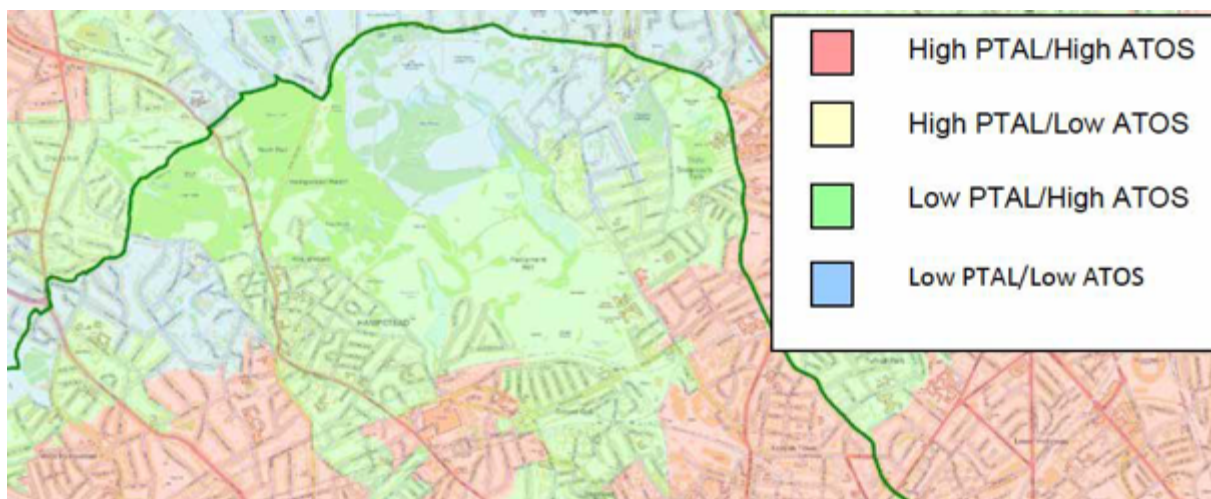
SD 3 AIR QUALITY

CONNECTIVITY

Section 5 of Camden’s Local Plan Evidence Report on car-free development (February 2016) demonstrates that Camden has high and improving public transport accessibility levels (PTAL) and connectivity¹. New methods of assessing connectivity (e.g. Access To Opportunities and Services (ATOS) and time mapping (TIM) have become available, showing that levels of connectivity within the borough are higher than had been represented in 2010 using PTAL as the sole indicator. It is expected that connectivity will continue to rise due to the delivery of infrastructure improvements.

Furthermore, Camden’s 2017 Local Plan Evidence Base has successfully demonstrated that, when using combined PTAL and ATOS measures “there are very few areas where there is a combined low PTAL and low ATOS score (blue areas)”² in the map below and “although some parts of the borough may not have high PTAL ratings (green), these areas are still well provided by essential local services within a relatively short distance on foot or by public transport”.

Map SD 1 Combined PTAL and ATOS Levels for Redington Frogнал, 2001



Source: Camden data from 2001 Census

Car-free development is supported by planning appeal decisions, even relating to Camden’s earlier Core Strategy and Development Policies³. These have found that off-street parking provision would prejudice the achievement of sustainable travel by undermining attempts to promote and encourage cycling, walking and public transport use and that off-street parking spaces within an area of high PTAL rating did not amount to sustainable development.

The Local Plan Evidence Report observes that, whereas trips by car in Camden declined by 31%, and total motor vehicle trips fell by 27% over the period between 2006 and 2014, the Frogнал & Fitzjohn’s ward experienced an opposite trend.

Although vehicle ownership per household is in decline in Camden, Frogнал and Fitzjohn’s is the one ward in which vehicle ownership increased between 2001 and 2011.

¹ Connectivity is much broader in its scope than public transport accessibility as it includes elements such as the proximity to jobs, shopping opportunities or essential services.

² It should also be noted that large parts of the blue areas cover Hampstead Heath, which is largely unpopulated.

³ APP/X5210/A/14/2222537 and APP/X5210/A/14/2213004

Table SD 1 Change in Vehicle Ownership by Ward, 2001 to 2011

	House-holds 2001	All cars or vans 2001	House-holds 2011	All cars and vans in 2011	% change in house-holds	% change in total cars or vans	% change in cars or vans per house-hold
Belsize	6,151	3,689	6,131	3,532	-0.3	-4.3	-3.9
Bloomsbury	3,977	1,165	4,819	1,134	21.2	-2.7	-19.7
Camden Town with Primrose Hill	5,371	3,119	5,905	3,004	9.9	-3.7	-12.4
Canteloves	4,718	2,504	5,094	2,226	8.0	-11.1	-17.7
Fortune Green	4,768	3,267	5,324	3,015	11.7	-7.7	-17.4
Frogna! and Fitzjohns	5,303	4,338	4,940	4,081	-6.8	-5.9	1.0
Gospel Oak	4,815	2,630	4,912	2,370	2.0	-9.9	-11.7
Hampstead Town	4,988	3,964	5,200	3,856	4.3	-2.7	-6.7
Haverstock	5,052	2,442	5,254	2,232	4.0	-8.6	-12.1
Highgate	4,844	3,494	4,788	3,316	-1.2	-5.1	-4.0
Holborn and Covent Garden	5,259	1,849	6,114	1,836	16.3	-0.7	-14.6
Kentish Town	5,204	2,752	5,793	2,535	11.3	-7.9	-17.3
Kilburn	5,223	2,375	5,758	2,105	10.2	-11.4	-19.6
King's Cross	4,394	1,385	4,594	1,072	4.6	-22.6	-26.0
Regent's Park	5,292	2,333	5,602	2,046	5.9	-12.3	-17.2
St Pancras and Somers Town	5,313	1,984	5,588	1,768	5.2	-10.9	-15.3
Swiss Cottage	5,843	3,847	5,860	3,662	0.3	-4.8	-5.1
West Hampstead	5,088	2,824	5,858	2,811	15.1	-0.5	-13.5
All	91,603	49,961	97,534	46,601	6.5	-6.7	-12.4

Source: Camden Annual Parking Report, 2014

AIR QUALITY

The Redington Frogna! Plan Area suffers from high NO₂ levels in excess of the permitted EU maximum: the European Emissions Standard for NO₂ is 40 µg/m³, averaged over one year.

Movements of private vehicles are encouraged and exacerbated by the grant of planning consents for specific off-street parking areas, both above and below ground. In Kidderpore Avenue, for example, basement parking allocations from three planning consents will result in 423 vehicles across three developments in one narrow street by end 2018.

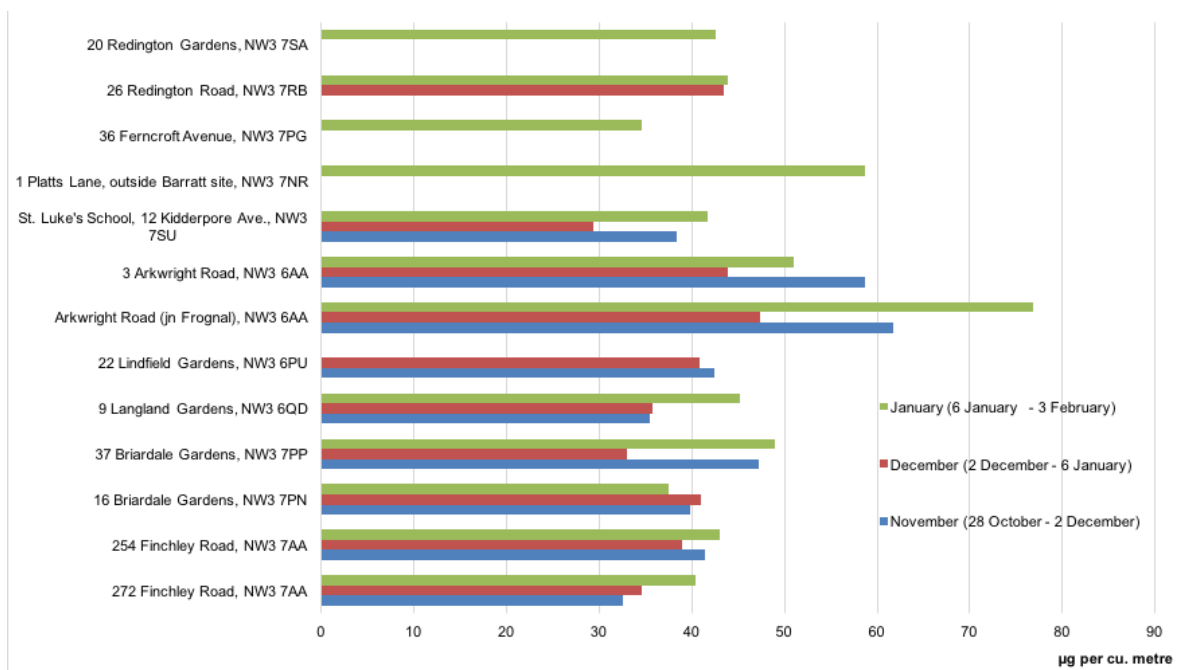
Redington Frogna! Association⁴ undertook diffusion tube monitoring for a period of three months from November 2015 to January 2016 at a variety of location types, from a quiet backwater to busy commuter routes. For almost all locations, average NO₂ readings were above permitted levels, ranging from 36 µg per cubic metre for a tube sited in a well-vegetated front garden with trees, close to the junction of Finchley Road and

⁴ umbrella group for street and residents' associations in the Redington Frogna! area. <http://search3.openobjects.com/kb5/camden/cd/results.page?pollingdistrict=17&borough=1&communitychannel=2-3-21>

Froggnal Lane, to as high as 62 µg per cubic metre for Arkwright Road, a very busy school-run and commuter route

It should be noted that these readings were taken prior to the completion of several recent consents for large underground car parks, notably Mount Anvil's Kidderpore Avenue north site and Barratt's Kidderpore Avenue south site. Air quality will since have deteriorated further.

Figure SD 1 Average NO2 Concentrations, November 2015 to January 2016



Source: Redington Froggnal Association

FINANCIAL VIABILITY

A Financial Viability Study, commissioned as part of the evidence to support Camden's Local Plan, tested the ability of a range of development types throughout the borough to viably meet planning policy requirements of the Local Plan. This concluded that overall, the car-free development policy "would have only a minor impact on the viability of development across the borough". Moreover, by omitting the provision of car parking, more space would become available to deliver "larger residential units and more communal and/or amenity space" and that there "would also be cost savings associated with not delivering car parking, which in the case of basements in particular could be very significant".

RECENT PLANNING CONSENTS

Despite Local Plan Policy T2 and the Redington Froggnal Conservation Area appraisal, off-street parking has continued to proliferate, front gardens have been lost and street scenes have become degraded to the extent that Redington Froggnal Association had presented to Camden in 2011 a case for the imposition of an Article 4 Direction. The case was accepted in June 2011 by **Joanna Ecclestone**, Camden's Conservation and Historic Buildings Advisor and further photographic evidence was compiled, as requested, and presented to **Caroline Welch**, Camden's Conservation and Historic Buildings Advisor in 2013.

An example of a planning consent granted since Policy T2 was introduced is 2017/1229/P for off-street parking in relation to new development at 5 Templewood Avenue (Evidence Base document (13) Camden Planning Committee Members' Briefing). Officers chose to apply a very narrow interpretation of the Policy, whereby the Policy is to be applied only where a completely new building is planned. As a result of this interpretation, consent was granted for a car lift, off-street / basement parking for eight vehicles, to be shared between two flats .

The provision of off-street parking was found to be at variance with sustainable development noted in appeal decision APP/X5210/A/14/2213004 in relation to an application concerning 3 Fellows Road (Evidence Base document (15)).

A planning inspectorate decision, APP/X5210/W/17/3178421 of 10 October 2017 in relation to 13 Fitzjohn's Avenue (Evidence Base document 16), further supports the need to retain front-boundary treatments. In this appeal, one of the main issues was whether the proposed development would preserve or enhance the character or appearance of the [Fitzjohn's/Netherhall] Conservation Area. The planning inspector concluded that "the partial loss of the boundary wall would unacceptably harm the character and appearance of the FNCA" (conservation area).