1.0 INTRODUCTION

1.1 This appraisal is prepared in relation to planning application 2025/4861/P ('the Application') submitted to the London Borough of Camden (LBC).

1.2 The Application seeks permission for a range of land uses on Land at Regis Road, London NW5 3EW ('the Application Site'). This mix of uses ('the Proposed Development') includes:

Demolition of existing structures (including part of the listed police station building) and phased redevelopment [of up to 24 storeys (residential equivalent) with basement levels] to include residential development (Class C3), commercial, business and service uses (Class E), film production uses (Sui Generis), education uses (Class F1), visitor accommodation (Class C1), reprovided recycling facility (Sui Generis), local community uses (Class F2), cinema (Sui Generis), drinking establishment (Sui Generis), and studio experience / museum (Sui Generis) together with supporting infrastructure including new and upgraded routes; landscaping, public realm and highway works; energy centre and plant installation; cycle parking and disabled car parking.

1.3 The Application is supported by the following documents which form the basis for this appraisal:

- Camden Film Quarter Transport Assessment (TA);
- Camden Film Quarter – Transport Supporting Information Technical Note (TAA);
- Camden Film Quarter Environmental Statement (ES);

1.4 This Appraisal considers the following matters:

- Establishment of Baseline Conditions;
- Trip Forecasting;
- Car Parking; and
- Environmental Impacts.

1.5 A summary and conclusion is provided at the end of this Appraisal which is that the assessments fail to demonstrate the Proposed Development's effects on highway safety or the local transport network and cannot be relied upon in decision-making because:

- The Transport Assessment and Environmental Statement are fundamentally unreliable.
- Baseline traffic data is outdated, unrepresentative, and site-specific surveys are absent.
- Trip forecasts underestimate movements by misapplying Census data, ignoring drop-offs, taxis, and operational traffic.
- Car parking demand is underestimated, and
- environmental impacts are based on internally inconsistent, unsupported figures. No transparent methodology is provided.

1.6 Therefore, in accordance with the NPPF paragraph 116, the planning application should be refused.

2.0 ESTABLISHMENT OF BASELINE CONDITIONS

2.1 Planning Practice Guidance sets out clear expectations regarding the baseline evidence that should underpin a Transport Assessment (TA). This includes:

- Existing levels of transport use and the availability, accessibility, and quality of public transport;
- Current traffic flows on highway links and at junctions within the study area, disaggregated by mode and vehicle type, together with identification of critical links and junctions; and
- Analysis of personal injury collision records on the public highway in the vicinity of site accesses for the most recent three-year period, or five years where a site lies within a recognised high-collision area.

2.2 The need for a robust and defensible baseline is reinforced by Institute of Environmental Management and Assessment (IEMA) guidance on the Environmental Assessment of Traffic and Movement, which emphasises that baseline data must be accurate, representative, and specific to the site and its immediate context.

The Application Site

2.3 The Application Site forms only part of the wider area referred to as the "Regis Road Growth Area" (RRGA). However, throughout the TA, references to the Application Site and the RRGA are used interchangeably. These are distinct areas and should not be conflated.

2.4 Paragraph 4.21 of the TA states that "Regis Road divides the Site in two and currently serves as the only vehicular access." This statement is factually incorrect. Regis Road divides the wider RRGA, not the Application Site. Furthermore, multiple parcels of land within both the Application Site and the wider RRGA are accessed from Holmes Road.

Traffic Surveys

2.5 The TA presents traffic survey data collected on Regis Road and Holmes Road. While these routes serve the Application Site, they also accommodate traffic associated with a wide range of unrelated land uses and destinations. Traffic generated by those uses would continue irrespective of whether the Proposed Development proceeds.

2.6 No surveys have been undertaken to quantify traffic generated by the existing uses within the Application Site itself. As a result, the TA fails to establish a true site-specific baseline against which the transport impacts of the Proposed Development can be meaningfully assessed.

2.7 Traffic data for Kentish Town Road is derived from surveys undertaken in 2012, approximately 13 years ago. The Transport Assessment Report states that this data has been uplifted to 2025 using growth factors from the National Trip End Model (NTEM). NTEM provides strategic, high-level forecasts of person trips across broad geographic zones and is not designed to capture localised changes in traffic demand or development-specific impacts. Its use to retrospectively estimate historic traffic growth on a short section of local road is inappropriate, rendering the resulting traffic flow estimates unreliable.

2.8 Kentish Town Road is an existing public highway, and standard practice would be to establish current traffic conditions through contemporaneous traffic surveys rather than modelling assumptions.

Road Collision Data

2.9 The TA includes no baseline personal injury collision data. Nor does it provide anecdotal or qualitative evidence of unreported collisions or an assessment of existing road safety risks, particularly for pedestrians and cyclists. This omission is significant given the scale and intensity of the Proposed Development.

Mode Choice

2.10 The TA estimates baseline mode share using Journey to Work Statistics (JWS) from the 2021 Census. JWS data relates solely to commuting trips and is therefore unsuitable for assessing mode choice associated with the wide range of proposed land uses. This limitation is further compounded by the fact that Census 2021 data was collected during periods of national COVID-19 lockdown, when travel behaviour was highly atypical.

2.11 Standard practice for establishing baseline mode choice involves a combination of observational surveys and questionnaire surveys of existing site users. No such surveys have been undertaken.

2.12 Baseline data that is artificially constructed and reliant on anomalous or inappropriate data sources cannot provide a sound basis for assessing the transport or environmental impacts.

Summary

2.13 The TA fails to establish a robust, site-specific transport baseline in line with Government and IEMA guidance because:

- The Application Site is repeatedly conflated with the wider Regis Road Growth Area, leading to factual inaccuracies regarding site access and configuration.
- Traffic surveys do not distinguish between traffic generated by the Application Site and traffic associated with unrelated surrounding land uses.
- No surveys have been undertaken to capture existing traffic generated by current uses on the Application Site.
- Outdated traffic data from 2012 has been inappropriately adjusted using NTEM growth factors, producing unreliable estimates of current traffic conditions.
- The TA contains no baseline road collision data and no assessment of existing road safety risks, particularly for active travel users.
- Mode share assumptions are based on Census 2021 Journey to Work data, which is unsuitable for the proposed land uses and distorted by lockdown conditions.

2.14 Overall, the baseline evidence presented is inadequate and cannot be relied upon to assess the transport and environmental impacts of the Proposed Development.

3.0 TRIP FORECASTING

Census21

3.1 Census 2021 Journey to Work statistics were collected during periods of COVID-19 lockdown, when Government guidance required large proportions of the workforce to work from home.

3.2 The TA relies on JWS data for the Camden MSOAs 003, 007, and 009. A comparison between 2011 (pre-pandemic) and 2021 data shows:

- 2021: 53.52% of people in work worked from home;
- 2011: 7.6% worked from home.

3.3 This stark contrast demonstrates the exceptional and unrepresentative nature of Census 2021 travel behaviour.

3.4 Trip and traffic forecasts derived from this data are therefore inherently unreliable.

Mode Choice Forecasts

3.5 Even if the atypical nature of Census 2021 data is set aside, JWS only describes commuting behaviour and is not applicable to other journey purposes such as leisure, education, shopping, servicing, or social trips.

3.6 Despite this, the TA applies Census 2021 mode shares indiscriminately across all journey purposes.

'Car Free' Development

3.7 The TA asserts that because the development is described as "car free," the 'Car Driver' and 'Car Passenger' mode shares should be assumed to be 0%. In practice 'Car Free', means car parking is restricted rather than motor vehicle access being prohibited.

3.8 While this assumption may partially apply to 'Car Driver,' it fails to account for increases in:

- Car Passenger trips, including drop-offs, pick-ups, and car sharing; and
- Taxi / Private Hire Vehicle trips, which commonly increase in locations where parking availability is constrained.

3.9 The TA makes no attempt to forecast the increase in these modes, despite well-established evidence that car-free developments generate higher taxi, PHV, and drop-off activity.

3.10 As a result, forecast vehicle movements are materially underestimated.

Trip Generation - Film Studio

3.11 Trip generation for the film studio element distinguishes between operational and non-operational trips.

3.12 The Applicant argues that only operational vehicle trips will occur. However, the definition of "operational" is not provided, nor is there any mechanism proposed to enforce such a restriction. In practice, staff, visitors, contractors, and ancillary activities are all integral to studio operations.

3.13 Claims that the Application Site is significantly more sustainable than comparator film studios are overstated. The site's Public Transport Accessibility Levels are broadly comparable, and existing parking demand in the area demonstrates a continued propensity for car travel.

3.14 The TA further argues that restricting parking will proportionately reduce traffic. This is a flawed and simplistic assumption, as the relationship between parking supply and traffic demand is not linear.

3.15 Evidence from other film studios shows that traffic demand persists irrespective of parking provision, with vehicles parking informally or illegally if necessary.

3.16 In the absence of robust evidence, film studio traffic forecasts are significantly underestimated, undermining the conclusions of the TA and ES.

Trip Generation - Non-Studio Land Uses

3.17 Trip generation for non-film studio uses relies on TRICS data.

3.18 While TRICS allows filtering by location and accessibility, no meaningful filtering has been applied. The dataset includes locations such as Dorset, Pembrokeshire, and County Sligo, which bear no resemblance to an inner London context.

3.19 The Applicant's claim that suitable London comparators do not exist is not credible. Alternative approaches, including first-principles forecasting or surveys of comparable inner London sites, were available but not pursued.

3.20 These errors are compounded by unrealistic mode split assumptions, including zero car passenger and zero taxi / PHV trips across all non-studio uses.

3.21 The trip forecasting methodology for non-studio uses is therefore fundamentally flawed.

4.0 CAR PARKING

4.1 The TA presents a car parking accumulation analysis indicating a requirement for 70 spaces, based on traffic generation assumptions derived from an assumed provision of 114 spaces.

4.2 This is a circular calculation: traffic generation is derived from parking supply, and parking supply is then justified by the resulting traffic generation.

4.3 In reality, film studios generate traffic regardless of parking provision. Evidence elsewhere confirms widespread informal and illegal parking associated with such uses.

4.4 The surrounding area offers opportunities for overspill parking on public and private land, which would result in disruption and adverse highway safety impacts.

4.5 The proposed parking provision is therefore likely to be insufficient, and a robust, evidence-based assessment is required.

5.0 ENVIRONMENTAL STATEMENT

5.1 Chapter 8 of the Environmental Statement (ES) assesses the environmental impacts of changes in road traffic arising from the Proposed Development.

Current Baseline Conditions

5.2 Establishing baseline conditions is fundamental to assessing the environmental impacts arising from a development.

5.3 Instead of relying on observed data, the Applicant has manipulated outdated and unrepresentative datasets using inappropriate modelling tools.

5.4 This approach is unreliable, and baseline conditions have not been properly established.

Future Baseline Conditions

5.5 The use of NTEM via TEMPRO to establish future baseline conditions is inappropriate for local roads due to insufficient spatial resolution.

5.6 Moreover, the current version of NTEM is, inter alia, based on the Office for Budget Responsibility (OBR) 2018-based population projections, using the 0% EU migration variant. These are outdated population assumptions that significantly understate current and forecast population growth. Recognising that forecasts and policy priorities can change over time, the DfT provides a range of NTEM-based trip forecast scenarios. So if any reliance is to be placed on NTEM in this instance, careful consideration needs to be given to which scenario is utilised and the reasons for why.

5.7 No justification is provided for the NTEM scenario selected.

5.8 As a result, future baseline conditions are not credible

Completed Development

5.9 It is understood that, from paragraph 8.161 onwards, the ES assesses the environmental impacts of the Completed Development.

5.10 For the reasons outlined above, the Applicant's traffic forecasts for the Proposed Development are unreliable and, in reality, are likely to be significantly higher.

5.11 A review of ES paragraphs 8.161–8.166 demonstrates a lack of correlation between the Completed Development traffic flows presented in the ES and the Forecast Traffic flows set out in the TA. Key examples include:

5.12 ES Table 8.17 asserts that no cars will travel to or from the Application Site, disregarding operational traffic, much of which will involve cars.

5.13 ES paragraph 8.164 states that, in addition to the "0" cars in Table 8.17, 504 vehicle flows are expected from delivery and servicing, of which 45 are HGVs. The remaining 459 vehicles presumably consist of cars or light vehicles and should therefore be reflected in Table 8.17. Furthermore, the source of the figure "504" cannot be traced to the TA.

5.14 TA paragraph 6.5.19 reports 995 vehicle trips per day along Regis Road associated with the Proposed Development. There is no explanation as to why this figure is not included or reconciled within the ES.

5.15 In short, the traffic volumes presented in the ES are not derived from the TA and have no other identifiable evidence base. On this basis, they appear to have been arbitrarily generated for the ES.

5.16 ES Table 8.18 purports to show percentage changes in traffic flows between the future baseline and the future baseline including development traffic. For example, it indicates that the Proposed Development will reduce traffic on both Regis Road West and Regis Road East. No supporting data or audit trail is provided. By contrast, Table 2.5 of the TAA predicts an increase of 595 vehicle movements per day on Regis Road East as a consequence of the Proposed Development. Once again, the ES figures appear unsupported and internally inconsistent.

5.17 In the absence of transparent methodology or supporting evidence, and given the clear misalignment with the TA, the assessment of traffic-related environmental impacts in the ES is unreliable and should be afforded no weight.

6.0 SUMMARY AND CONCLUSION

6.1 The Transport Assessment and Environmental Statement for the Proposed Development are fundamentally flawed.

6.2 Baseline traffic and transport conditions are unreliable due to conflation of the Application Site with the wider growth area, outdated or inappropriate data, absence of site-specific surveys, and missing road safety information.

6.3 Trip generation and mode share forecasts are materially underestimated, relying on unrepresentative Census data, flawed "car-free" assumptions, and poorly filtered TRICS data.

6.4 Car parking demand is underestimated through circular reasoning, ignoring overspill and informal parking patterns.

6.5 Environmental impacts are assessed using internally inconsistent and unsupported traffic forecasts, with no transparent methodology or credible evidence base.

6.6 Collectively, these deficiencies render the transport and highway conclusions unsound, preventing any reliable assessment of the Proposed Development's impacts on highway safety or the local transport network.

6.7 Therefore in accordance with the NPPF paragraph 116, the planning application should be refused.