

**ARDENT**  
CONSULTING ENGINEERS

AN EMPLOYEE OWNED COMPANY

**REF APP/D5120/W/22/3293225**

**Proposed Carehome Development 2, 4, 6, 8 Danson  
Road, Bexleyheath on behalf of Carebase Ltd**

**PROOF OF EVIDENCE: TRANSPORT**

**Of Ian Wharton**

**BA (Hons) MCIHT**

**REPORT REF.  
190320-10**

**NOVEMBER 2022**

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## 1. The Witness

- 1.1 My name is Ian Wharton. I am an Associate Director with Ardent Consulting Engineers (ACE) based in their Essex office with oversight of transport planning work of the London, Essex and Kent office teams. Prior to joining Ardent in 2017 I worked for Boreham Consulting Engineers (subsequently Waterman Group) for 11 years.
- 1.2 I have a Bachelor of Arts in Geography from the University of Oxford. I am a Member of the Chartered Institution of Highways and Transportation (MCIHT).
- 1.3 I have over 16 years' experience as a Transport Planner, working for the private sector, with experience in highway development control matters.
- 1.4 My experience includes the planning promotion of residential, carehome, retail and employment developments principally in the southeast of England including London.
- 1.5 ACE is a transport, infrastructure engineering, flood risk and environmental services consultancy working in a wide range of projects within the UK.
- 1.6 I have worked for ACE since June 2017, and have represented the appellant, Carebase Ltd, on other carehome schemes, including supporting them in Appeal situations, most recently on a scheme in the neighbouring authority of the London Borough of Bromley which was allowed at Appeal in 2021 (**CD10.1**).
- 1.7 With the benefit of my experience, I have been retained by Carebase for the Appeal at the Danson Road site, following my involvement at the planning application stage. ACE were first appointed on this site in 2019 and have been involved in the development of the scheme and have engaged with the London Borough of Bexley Highways Department throughout the planning application process.
- 1.8 I am familiar with the Appeal Development and the surrounding area, having visited it on a number of occasions. This evidence has been prepared in

accordance with the guidance of my affiliated institution (CIHT) and the opinions expressed are my true professional opinions.

## 2. Scope Of Proof of Evidence

- 2.1 The planning application subject to this Appeal was made to the London Borough of Bexley (LBB) under planning reference number 19/03072/FULM, and was recommended for approval by officers, with no objection raised on highways grounds. Nevertheless, elected members of the planning committee took a contrary view and the application was refused, with six reasons cited in the decision notice.
- 2.2 The six reasons for refusal included: **Reason 2** regarding intensity of vehicle movements having a detrimental effect on highway safety and congestion, and **Reason 3** regarding insufficient on-site car parking leading to increased parking stress on surrounding streets.
- 2.3 Initially, the Appeal was to be held as an Informal Hearing but was subsequently upgraded to a Public Inquiry format and as a result, this Proof of Evidence (PoE) has been prepared to respond to the change in process.
- 2.4 On 7<sup>th</sup> November 2022, it was confirmed to the Planning Inspectorate by the LBB that following a review of the case that they would not be contesting any of the reasons for refusal, inclusive of those matters relating to highway safety, congestion and car parking.
- 2.5 A Statement of Common Ground (SoCG) with LBB has been prepared and is provided at **CD5.3**) which confirms that LBB find no harm or severity of impact on highway safety, congestion or parking grounds. This is in accordance with the *National Planning Policy Framework (NPPF, 2021 – CD8.12)* test at Paragraph 111, which is considered at the relevant section of this PoE.
- 2.6 The Danson Neighbours Residents' Group (hereafter known as the "Rule 6 Party") has made representations through the Appeal process and submitted a request for Rule 6 status. This was granted by PINS on 19<sup>th</sup> October 2022. The Rule 6 Party has submitted a Statement of Case (submitted on 1<sup>st</sup> November 2022, received by Appellants on 3<sup>rd</sup> November 2022).

- 2.7 The Rule 6 Party raise issues in relation to Road Safety (Paragraphs 5.1 to 5.25) and Parking (Paragraphs 6.1 to 6.16) which largely follow the points originally raised by LBB in their reasons for refusal. These points have now been confirmed by LBB as being acceptable in the confirmation that they will not be defending the reasons for refusal at the Inquiry and through the signed SoCG, however it is understood (at the time of preparation of this Proof of Evidence) that the Rule 6 Party will continue to contest these aspects.
- 2.8 Through my PoE I specifically address the transport and parking matters raised by the Rule 6 Party. I also offer a response to the third-party objector comments submitted to the Inspectorate as part of the Appeal, grouping matters together where common themes occur.
- 2.9 This PoE comprises a series of sequential points. Before responding to them, I consider it is necessary to put the overall contention in the context of national guidance. In particular, paragraph 111 of the *NPPF* (**CD8.12**) advises that: -
- "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."*
- 2.10 It will be noted that the statutory consultee for highway matters (LBB Highways) offered no objection to the planning application, subject to the imposition of planning conditions. The Local Highway Authority (LHA) confirmed within the *Committee Report* (**CD4.21**) that *"all possible material highway impacts have been fully assessed and found to be acceptable"*.
- 2.11 Significant weight should be given to LBB's position on highways through the planning application where they offered no objection to the scheme, and subsequently through the Appeal process where they have confirmed they are not defending the reasons for refusal. It is the LHA's duty is to assess the impact of development on the local highway network including highway safety, congestion and parking.
- 2.12 It is therefore clear that the impact on highway safety is considered by the Appellant and the LHA as being acceptable, and that the residual cumulative impacts on the road network are not considered by either party to be "severe".

2.13 This is contrary to the position of the Rule 6 Party. This PoE will therefore draw further evidence as to why the position of the Appellant and the LHA is indeed correct in these assertions.

2.14 The Statement of Case of the Rule 6 Party submitted to the Inspector raises the following alleged issues with the development: -

- The accessibility of the site;
- The level of parking provision;
- The safety of the access / egress points onto Danson Road including the ability to control or restrict right turning movements out of the site egress position;
- The impact of the development proposals upon the nearby signal-controlled junction known as the Crook Log (junction of Park View Road and Danson Road);
- The impact of alternative routes for vehicles upon leaving the site; and
- The appropriateness of mitigation measures as proposed.

2.15 There are a number of third-party objections submitted for the Appeal, and they by and large follow the same issues as outlined above by the Rule 6 Party. I have therefore considered that the points addressed regarding the Rule 6 Party apply also to those of the third-party objectors. The only specific objection that differs from the points raised is that in relation to Miss Harpreet Bria of 5 Danson Road. Consideration of her specific circumstances is outlined within this PoE, concluding that the Appeal scheme would not prejudice her care.

2.16 In seeking to address the above and assist the Inspectorate in its determination of the appeal, my PoE is structured as follows: -

- (a) I consider the site's locational characteristics and the ability to access the site by modes other than the private motor vehicle which has a bearing on both the parking provision proposed and the traffic impacts of the development;

- (b) I outline the site's predicted development impacts with particular reference to the Crook Log junction and Danson Road;
  - (c) I review the safety considerations of the proposed development and its access and egress points;
  - (d) I highlight the engagement process and decision-taking process of the LHA in its role as the statutory consultee responsible for the maintenance of highway safety, congestion levels and parking application; and
  - (e) I refer to the Policy context of the above matters a) to d) within the relevant sections.
- 2.17 Where referenced, the appendices which I have provided in my evidence will be prefixed by 'IW' (e.g. Appendix IWA, IWB, etc) for clarity with other submitted proofs.
- 2.18 This evidence should be considered in conjunction with the evidence provided by Ms Nicola Coveney, Carebase Ltd's Managing Director.



### 3. Location of Development

- 3.1 The location of the Appeal site is important in considering the effects of the development on both highway impact and the level of provision of car parking at the site.
- 3.2 As has been agreed with LBB in the Statement of Common Ground (**CD5.3**) the site is contained within a Public Transport Accessibility Level (PTAL) of 3 to 4. PTAL is based on the weekday morning peak period services at bus stops within 640m (8 minutes' walk) and railway stations within 960m (12 minutes' walk). The northern section of the site comprising numbers 2 and 4 Danson Road are rated as "good" (PTAL 4), and the southern section of the site comprising numbers 6 and 8 Danson Road are rated as "moderate" (PTAL 3).
- 3.3 In essence however, the PTAL score of a site will not markedly change on such a short distance, with people easily able to use public transport (specifically bus services) from this site. Bus services operate extensively in the area, with services running from early morning (services 89 and 96 run from around 5am) to late evening inclusive of weekends.
- 3.4 A copy of the PTAL extract for the site is contained at **Appendix IWA**.
- 3.5 In addition to the raw approach taken by PTAL, the WebCAT planning tool developed by Transport for London (TfL) (<https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>) allows Time Mapping (TIM) to be undertaken on sites. This effectively identifies the distance a person could travel by public transport from a given location in a specific time.
- 3.6 **Figure 1**, below, shows the locations in which people can access the site from in the AM peak period by time of travel on public transport for a 2021 scenario to the Appeal site. It should be noted that as WebCAT is a TfL program, this does not include locational analysis outside of the London Borough areas. **Figure 2** provides the same analysis for a PM peak period from the Appeal site.

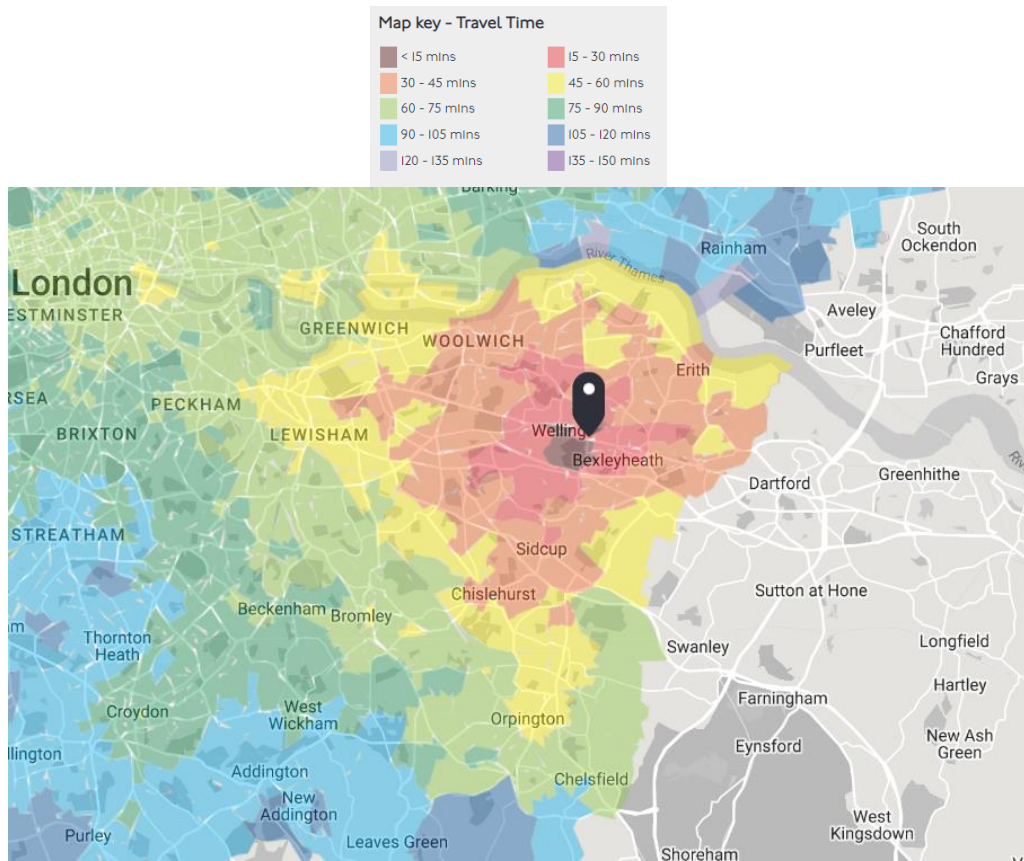


Figure 1 – AM (2021) TIM Map of Travel to Location

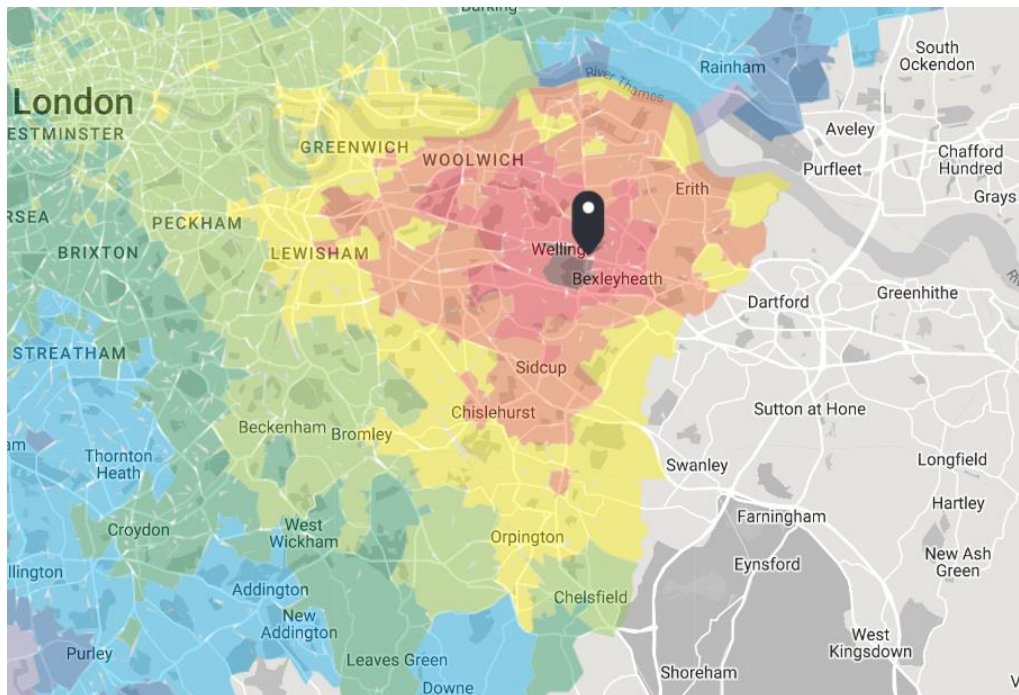
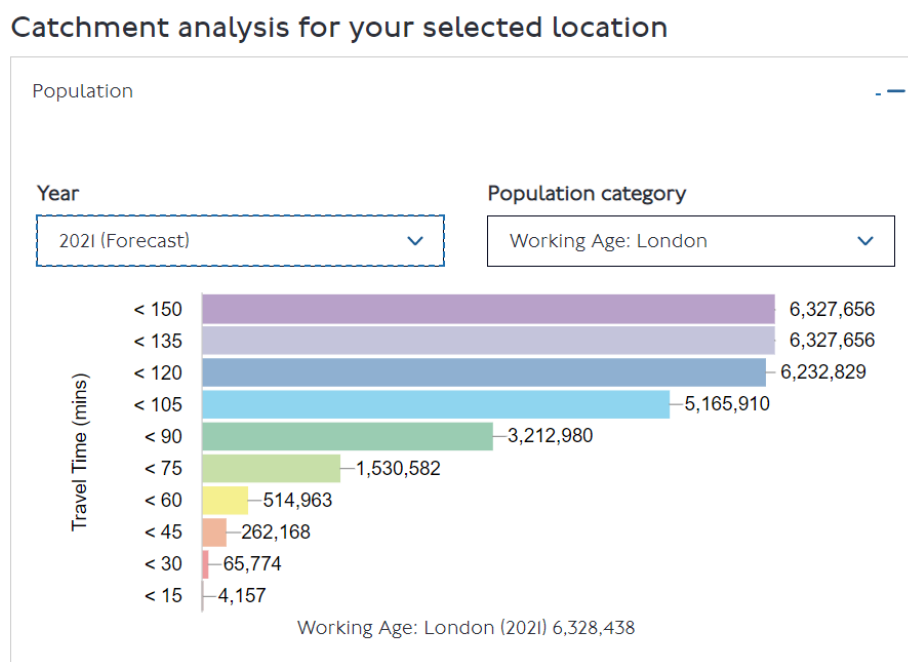


Figure 2 – PM (2021) TIM Map of Travel from Location

- 3.7 The site is clearly accessible by public transport with significant parts of south-east London being covered on public transport trips up to 60-minute travel time.
- 3.8 In addition to TIM mapping, the program also allows for population data to be extracted.
- 3.9 The data calculates (**Figure 3**, and full extract at **Appendix IWB**) that there are over 500,000 working age people within a 60-minute public transport trip of the Appeal site. Again, this should be noted as excluding populations outside of the London Borough areas in which further population numbers would be located e.g. Kent.



**Figure 3 – Population Working Age within Public Transport Travel Time of Appeal Site**

- 3.10 It is therefore clear that there is a large workplace population within an hour’s public transport journey of the Appeal site.
- 3.11 This is further highlighted by Carebase Ltd’s own analysis which identified that for the Heathfield Court site located at Northumberland Heath (also within LBB

authority area), that 79% of staff reside within a 3-mile radius of the carehome (see the evidence of Ms Nicola Coveney, paragraph 5.4 and her appendix 10).

- 3.12 The Institution of Highways and Transportation (IHT) *Guidelines for Providing Journeys on Foot* (2000, extract at **Appendix IWC**) identifies preferred maximum distances for commuting purposes as being 2km (approximately 1.25 miles). Ms Nicola Coveney's evidence (paragraph 5.4 and her appendix 10) identifies that some 41% of staff are located within 1-mile of the Heathfield Court site, and a further 26% between 1 and 2-miles of the site. This is supported by the National Travel Survey of 2021 (NTS, published August 2022, extract at **Appendix IWD**) which indicates that 82% of personal trips under one mile are made on foot.
- 3.13 The ability for a large proportion of staff to be employed at the Appeal scheme to therefore walk to work is clear.
- 3.14 If staff are not within walking distance of the site, then there is the ability to commute by cycling. The Appeal scheme is providing on-site cycle parking to the required standards, as confirmed by LBB in their Report to Committee (**CD4.21**). This is further secured via an appropriate condition (draft condition number 12 contained within the SoCG, **CD5.3**) which secures the approval of such spaces and their completion and installation prior to first occupation.
- 3.15 Statistics on personal travel trips from the Department for Transport (DfT) within the Cycling and Walking Investment Strategy (2016) which are referenced in Local Transport Note 1/20 on Cycle Infrastructure Design (July, 2020) (**Appendix IWE**) show that two out of every three personal trips are less than five miles in length.
- 3.16 Noting that Nicola Coveney's evidence identifies 79% of staff of the Heathfield Court site live within 3 miles of the carehome, there is a significant potential catchment of staff (and visitors) that could use cycling as a mode of travel.

- 3.17 The evidence provided by Nicola Coveney also indicates that 58% of the Heathfield Court residents have been referred to the carehome from within 3-mile radius of the carehome itself (paragraph 2.10 and her appendix 4).
- 3.18 Given that a high proportion of residents are from a local catchment area it is logical that many of them will have family or friends seeking to visit them. This gives those visitors the opportunity to travel by public transport, walking or cycling to the carehome. As has been identified in **Figures 1 and 2**, even travel beyond a 3-mile radius can be achieved well within a 1-hour travel time by public transport (for example, Orpington, Lewisham and Greenwich are within a 45 – 60-minute public transport journey of the appeal site and are further than the 3-mile catchment used within the Heathfield Court analysis by Carebase Ltd).
- 3.19 In summary, it is my opinion that the site is well-located for travel by non-car modes given its access to public transport and the large local residential population. Carebase Ltd’s own analysis of their nearest site also identifies the fact that staff and residents are expected to be drawn from a largely local catchment area, allowing for walking, cycling and public transport trips to be a genuine option. The effect that these travel modes have on the development is discussed in relation to the car parking level proposed and the impact of the development is now discussed.

## 4. Consideration of Parking Provision

### Parking Policy

4.1 The following policy documents are relevant for the purpose of the consideration of parking provision for the Appeal scheme.

### **LBB – UDP (Adopted 2004, Addendums with updates in 2007 and 2012) – CD8.1**

4.2 Policy T17 states: -

*"Applicants should make provision for off-street car parking spaces in their developments, including applications for changes of use.*

*In the case of smaller developments, the applicant may be required to demonstrate how the travel needs arising from the development will be met in circumstances where there are concerns about the impact of on-street parking on amenity and traffic flow.*

*Parking spaces should be located so as to discourage on-street parking and respect the amenity of near-by residents."*

*\*Saved UDP (2007) Transport policies T17-T22 on parking regulations/standards are in general conformity with the 2011 London Plan, however annex one on parking standards has been replaced by the London Plan parking standards set out in table 6.2. In interpreting the London Plan parking standards reference should be made to paragraph 4.7.14 of the Core Strategy.*

4.3 It is therefore necessary to review the parking policy in further detail as advised by the footnote to Policy T17, noting however that parking standards have also been further updated in various documents since 2011.

**2011 London Plan Parking Standards – Table 6.2**

- 4.4 The (now superseded) 2011 London Plan was adopted in July 2011 and was in place at the time of the UDP review in 2012.
- 4.5 No specific standards are available for carehomes or nursing homes in Table 6.2 of the 2011 London Plan.
- 4.6 The preamble to Table 6.2 in the 2011 London Plan states that *"If no standard is provided but there is an equivalent in PPG13, that PPG13 standard should be taken as a maximum although boroughs wish to consider use of a lower maximum to reflect London's higher levels of public transport accessibility when compared to the national picture. If there is no standard provided in either the London Plan or PPG13 the level of parking should be determined by the transport assessment undertaken for the proposal and the availability of on and off-street parking."*
- 4.7 It is noted that there were no specific standards for a carehome or nursing home in *PPG13: Transport* (which was withdrawn in 2012 when it was replaced by the original version of the *NPPF*). Therefore, the presumption is that parking should be determined by the TS submitted with an application, and the availability of on and off-street parking.
- 4.8 To this end, the TS submitted with the application has outlined the parking level requirements for the site, based upon the developer's operational needs and through the use of comparable traffic surveys of a local site. This approach has been accepted by LBB Highways in their response to the planning committee as follows: -

*"The proposed development would provide seventeen (17) car parking spaces for staff and visitors. One space would be provided for disabled parking, which is considered to be acceptable in the view of the Local Highways Authority. The London Plan (2021) does not set out a parking requirement for this use with discretion for the LPA to define what would be acceptable. Given the PTAL of 3-4 (Moderate-Good) and the proposed use, movements of staff and visitors,*

*the car parking provision proposed would be considered acceptable.*" [my emphasis added]

- 4.9 The LBB has since agreed within the SoCG (**CD5.3**) that the parking level proposed (as highlighted previously within the statutory response at the planning stage) is appropriate in this location and for this land use.

**LBB Core Strategy – paragraph 4.7.14 – CD8.2**

- 4.10 The UDP notation at the end of Policy T17 also requires the policy to be read in conjunction with paragraph 4.7.14 of the Core Strategy.

- 4.11 This states:

*"4.7.14 ...the Council's Parking Strategy seeks to contribute to the competitiveness, regeneration and environmental quality of the borough through the appropriate amount, location and design of parking facilities."*

- 4.12 The Core Strategy paragraph is considered to be consistent with the development proposals given the level of parking for the site has been demonstrated through the TS and evidenced from existing site operations, and agreed with LBB Highways as appropriate.

**Additional Policy Considerations**

- 4.13 In addition to Policy T17 (including London Plan 2011 version and the Core Strategy Paragraph 4.7.14) there are further considerations as to the policy situation with regards to parking standards.

- 4.14 Mainly these are in relation to the change in policy documents since the UDP / Core Strategy was adopted.

- 4.15 The following adopted parking policy is considered relevant.

**2021 London Plan Parking Standards – adopted – Policy T6 (Car Parking) – CD8.3**



- 4.16 As with the earlier (superseded) 2011 version of the London Plan, the London Plan (2021 version – **CD8.3**) does not include specific standards for a carehome or nursing home land use. However, land use car parking standards contained within the London Plan are noted as being maximum standards.
- 4.17 In this case, the 2021 London Plan states "*Where no standard is provided, the level of parking should be determined on a case-by-case basis taking account of Policy T6 Car parking, current and future PTAL and wider measures of public transport, walking and cycling connectivity*" [emphasis added].
- 4.18 The elements of Policy T6 considered relevant to the development proposals are as follows: -

*"A - Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.*

*B - Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy.*

*C - An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.*

*D - The maximum car parking standards set out in Policy T6.1 Residential parking to Policy T6.5 Non-residential disabled persons parking should be applied to development proposals and used to set local standards within Development Plans.*

*E - Appropriate disabled persons parking for Blue Badge holders should be provided as set out in Policy T6.1 Residential parking to Policy T6.5 Non-residential disabled persons parking.*

*G - Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles in line with Policy T6.1 Residential parking, Policy T6.2 Office Parking, Policy T6.3 Retail parking, and Policy T6.4 Hotel and leisure uses parking. All operational parking should make this provision, including offering rapid charging...*

*I - Adequate provision should be made for efficient deliveries and servicing and emergency access.*

*J - A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design.*

*K - Boroughs that have adopted or wish to adopt more restrictive general or operational parking policies are supported, including borough-wide or other area-based car-free policies. Outer London boroughs wishing to adopt minimum residential parking standards through a Development Plan Document (within the maximum standards set out in Policy T6.1 Residential parking) must only do so for parts of London that are PTAL 0-1. Inner London boroughs should not adopt minimum standards. Minimum standards are not appropriate for non-residential use classes in any part of London.*

- 4.19 The current London Plan is considered relevant to the consideration of the parking provision, given it is an updated document over and above that which was set out 10 years previously.
- 4.20 The proposals are considered to accord with the aspects of Policy T6 as set out above. In particular, it is important to note that the Mayor of London's guidance suggests that at part A and B of the Policy that car-free development should be the starting point for any development proposal, and that this is for sites in areas well-connected to public transport.
- 4.21 The proposals are already acknowledged as having a PTAL of "Moderate to Good" (3-4) and are therefore considered to comply in this respect.

- 4.22 In addition, the absence of on-street parking restrictions should not [my emphasis added] be considered a barrier to restricting car parking at development sites. This is explored further later in my evidence.
- 4.23 Again, LBB Highways Officers have accepted that the proposed parking level is appropriate for this development proposal and therefore the evidence-based approach as is requested by London Plan policy is considered appropriate in this situation.

**LBB – Draft Local Plan (Regulation 19 and Regulation 22 version) – CD8.6**

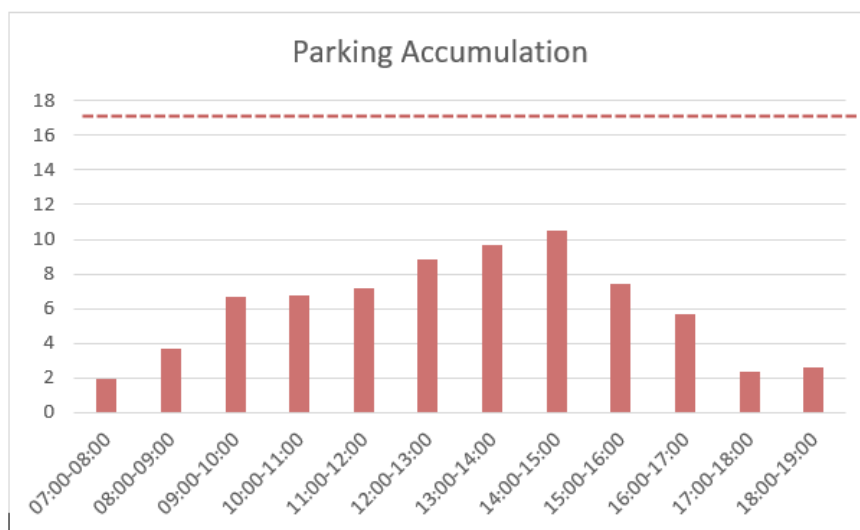
- 4.24 The Draft Local Plan (submission draft version, 2021) for Bexley has not been adopted and therefore does not carry full weight.
- 4.25 However, for completeness, the Regulation 22 version (main modifications) has been reviewed for the parking standards that Bexley are seeking to apply – this being the version as amended following Inspector review at Examination.
- 4.26 Draft Policy DP23 – Parking Management sets out the requirements for car parking. Paragraphs 1 and 2 set out the principles for sustainable development with a focus on the parking provision for residential land use class. Whilst the Appeal scheme is class C2, it does not strictly operate as a residential land use class given the likely age and frailty of residents and the fact it provides significant employment on the site.
- 4.27 However, it is noteworthy that parking provision levels for residential land use (paragraph 2) below the London Plan maximum standards may be acceptable in PTAL 3-4 areas where a parking stress survey demonstrates sufficient off-site parking capacity. This is considered further in my evidence.
- 4.28 Paragraph 4 does however set out standards for specialist housing for older people. This suggests that a “case by case” review will be undertaken using the London Plan residential parking standards as a starting point and considering any particular needs of visitors and staff. This all needs to be

considered within the context of the levels of public transport accessibility and the characteristics of the carehome and its residential make-up.

- 4.29 It then goes on to say that this should be informed by a TS and other appropriate information. Extract from the Local Plan Main Modifications document relating to draft Policy DP23 is provided at **Appendix IWF**.
- 4.30 Whilst it is considered that the draft Local Plan has limited weight in comparison to the other policy documents that are adopted, the development proposals do accord with Policy DP23. The proposed parking level has been set out through review in the TS, and the proposed site operator is content with the amount of parking provided with respect to staffing levels, visitor levels and the inability of their residents to operate a vehicle given their level of care requirements.
- 4.31 It is therefore considered that the scheme is still consistent with the emerging policy requirements.

#### **Level of Provision and Sufficiency**

- 4.32 The LBB Highways Officer raised no objection to the proposed development at the planning application stage (**CD4.21**), and LBB has since agreed that parking provision levels are sufficient through the SoCG (**CD5.3**).
- 4.33 A parking accumulation exercise has been undertaken to provide an estimate of the parking demand using the trip rates from the TS (from Table 5.2 of the TS, **CD1.16**) extracted from the TRICS database for weekdays between 0700-1900hrs. The graph below shows the accumulation of arrivals and departures throughout the day. As can be seen, the peak demand is shown to be well below the 17 spaces proposed and so can be accommodated within the site.



**Figure 4** – Car Parking Accumulation calculated from TRICS data from original Transport Statement submission

- 4.34 In addition to the use of TRICS data from the original report, parking accumulation surveys have been undertaken at the Heathfield Court site as a proxy for the usage levels at the proposed scheme (**CD3.1**).
- 4.35 The Heathfield Court site is the nearest Carebase Ltd-operated carehome and it is considered a good match in terms of location, although it has a much lower PTAL score than the appeal site, with a rating of 1b (poor).
- 4.36 A survey of the Heathfield Court site was undertaken in February 2020 (pre-COVID pandemic conditions), and the analysis indicated that maximum parking accumulation of the site was 12 vehicles occupying an 18-space car park (67% capacity). Results of the parking survey were provided to the LBB as part of the planning application and accepted as appropriate for comparison purposes – **CD3.1**).
- 4.37 On the basis of the above evidence, it has been shown that there is a lack of specific parking policy requirement for a carehome land use. In the absence of parking requirements and in line with both the 2011 and 2021 London Plans, evidence has been provided to provide a case-specific proposal taking account of existing public transport accessibility and connectivity.

- 4.38 As such, parking demand has been calculated using trip rates from the TRICS database and a survey undertaken at another similar carehome by the same operator in the LBB area. Both calculations show the proposals include sufficient parking on site to accommodate demand.
- 4.39 As has been highlighted previously, the appellant is an existing care home operator, with a number of sites across southeast England.
- 4.40 A review of some of the Carebase sites was undertaken to consider the level of car parking provided for each one. As each site does differ in terms of its accessibility the most appropriate site was then surveyed.
- 4.41 The following sites are currently operating by Carebase of a similar scale to that proposed.

**Table 4.1: Existing Carebase sites**

<b>Site Location</b>	<b>Number Bedrooms</b>	<b>Number of Car Parking Spaces</b>	<b>Number spaces per bedroom</b>
Watermill House, Hemel Hempstead	70 bedrooms	16	0.24
Heathfield Court, Bexley	66 bedrooms	18	0.27
Cherrywood, Chelmsford	66 bedrooms	20	0.30
Appeal Site – Danson Road	70 bedrooms	17	0.24

- 4.42 As can be seen above, there are a number of 66 to 70-bedroom residences operating by Carebase in Southeast England. Each site has an on-site parking provision similar in level to the proposals.
- 4.43 The proposed development would have the same ratio of spaces to bedrooms as the facility at Hemel Hempstead, and marginally lower than that of Heathfield Court. The latter has a worse PTAL than the Danson Road site which is significantly more accessible by non-car modes.

- 4.44 Given the site's recognised PTAL of 3-4 and its location within Greater London which has greater population and ease of access to public transport in comparison to other settlements, this is considered appropriate.
- 4.45 The proposed level of on-site car parking provision associated with the appeal scheme is considered to be appropriate and in keeping with the site's location, and the requirements of the operator.
- 4.46 The evidence shows that there is sufficient on-site car parking provision for visitors and staff. This will prevent overspill car parking from occurring and resulting in detrimental impact to the amenities of local residents as alleged by the Rule 6 Party.
- 4.47 This level of parking and approach to provision has been accepted by LBB Highways in the Report to Committee (**CD4.21**) and subsequently within the SoCG (**CD5.3**).

#### **On-Street Capacity**

- 4.48 The sufficiency of car parking spaces on-site as demonstrated above (and accepted by LBB Highways during the planning application and within the SoCG), together with Travel Plan (**Appendix IWG**) measures to encourage staff to travel to the site sustainably will prevent overspill car parking from occurring. Therefore, I would not expect any significant adverse impacts to occur as a result of this development in road safety terms.
- 4.49 Irrespective of the above, concerns by the Rule 6 Party in relation to parking capacity on local roads has been raised.
- 4.50 In order to review this potential, an exercise has been undertaken to understand the existing parking pressures in the local area.
- 4.51 Parking beat surveys, using the recognised "Lambeth methodology", were undertaken on Wednesday 30th and Thursday 31st March 2022 every 3 hours between 06:30-18:30 for the roads within 500m surrounding the site. This is the standard methodology applied across Greater London for non-residential land

uses (as whilst carehomes are residential in nature, they are more akin to non-residential sites as only staff and visitors are expected to travel to/from the site, not the residents themselves, who would not be expected to own a car due to their frailty or condition) – see extract at **Appendix IWH**.

- 4.52 The results showed that during the working day, parking pressure in the local area varied from around 50% occupation of spaces at 06:30, peaking at around 73% occupancy at 12:30. To put the absolute numbers in context, this means that there were 180 to 200 available parking spaces on roads within 500m of the site.
- 4.53 A copy of the parking surveys has been provided at **Appendix IWI**.
- 4.54 It is considered that the parking provision for the scheme is sufficient based upon the existing operational site at Heathfield Court and a review of the TRICS data, and the measures being set out within the Travel Plan to encourage sustainable travel. However, even if any overspill of demand did occur, then there is sufficient on-street capacity in the surrounding area to withstand the small number of additional vehicles that would likely be displaced.
- 4.55 It is noted that the **London Plan** (2021 – **CD8.3**) states at Policy T6 C that:
- "An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets."*
- 4.56 I also refer to the draft Bexley Local Plan paragraph 2 of Policy DP23 which accepts that parking provision below London Plan maximum standards may be acceptable in areas that have a PTAL of 3-4 that are outside of CPZ and where it can be demonstrated through a parking survey that there is sufficient on-street capacity.
- 4.57 It is therefore considered that the Appeal scheme accords with the adopted and emerging local and regional standards, and parking is provided to an acceptable level, noting that this has also been accepted by the LHA and Local Planning Authority through their agreement within the SoCG (**CD5.3**).



4.58 The implementation of a Staff Travel Plan, although not specifically requested by LBB during the application stage would further seek to reduce the need to travel by car, and therefore alleviate concerns regarding parking pressures at the site. A draft Staff Travel Plan has been provided at **Appendix IWG**, and there is a draft planning condition 17 as referenced in the SoCG – **CD5.3** which requires the Travel Plan to be approved and implemented prior to occupation of the premises.

### **Servicing Trips**

4.59 Servicing trips account for a very small proportion of trips to and from a carehome.

4.60 There is sufficient space within the car park for large vehicles of the size expected to frequent the site to enter and exit in forward gear. This is shown on the vehicle tracking drawings contained at **Appendix IWJ**.

4.61 As is evidenced in the Heathfield Court parking survey results (**CD3.1**) servicing movements of only one servicing vehicle was recorded within the survey. This was classified as an Other Goods Vehicle 1 (OGV1) i.e. a 2-axle vehicle of 3.5-7.5 tonnes such as a box van. This vehicle was present on-site for no more than 30 minutes in the middle of the day (arrival between 11:45 and 12:00, departure between 12:00 and 12:15).

4.62 This is considered typical of a carehome, with some deliveries (e.g post) also occurring in smaller vehicles. Refuse collection services (e.g. medical waste) are privately contracted and this can help in specifying the size of vehicle required to service the site.

4.63 Access to the site is achievable by vehicles up to a 7.5 tonne box van (8m in length) which is a typical vehicle size for a land use such as this. This is further exemplified by the data contained in the TRICS analysis within the TS (**CD1.16**) which identifies 2 arrivals and 2 departures per average day for OGVs and Public Service Vehicles.

4.64 For servicing of the site, there is flexibility over the operation of the car park. It is acknowledged within the SoCG (**CD5.3**) that a Car Park Management Plan

and a Servicing and Delivery Management Plan are to be conditioned which will detail the allocation of parking spaces to any staff, and the approach to servicing and delivery arrangements in more detail.

4.65 The north-western most bay of the car park has been provided extra room for use as a disabled bay. This is close to the entrance of the premises and allows extra room around the vehicle in this location. Carebase Ltd have confirmed that on many of their sites the disabled spaces are dual-used by ambulances on the rare occurrence that ambulances are required on site.

4.66 As is noted, within the parking provision consideration section, it is estimated from both the TRICS data and the Heathfield Court data that parking accumulation levels at the site would not reach the total of 17 spaces provided, and so car parking management could, if necessary, allocate spaces for dual-use as servicing locations on specific days. However, based upon both the TRICS data and the survey data from Carebase Ltd's other premises, this is unlikely to be considered necessary.

## 5. Development Impact

### Development Impact - Policy

5.1 The following policy documents are relevant for the purpose of the consideration of development impact.

#### National Planning Policy (NPPF) – adopted July 2021 – CD8.12

5.2 The *NPPF* sets out the Government’s position in relation to the approach to considering sustainable development.

5.3 **Paragraph 110** states that the assessment of development sites should ensure four items are achieved, these being:

*a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*

*b) safe and suitable access to the site can be achieved for all users;*

*c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and*

*d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*

5.4 The proposed development was adjudged by LBB Highways Officers during the planning application (**CD4.21**) process to have complied with Paragraph 110 of the NPPF. This has also subsequently been confirmed by LBB through the SoCG (**CD5.3**).

5.5 This is summarised in the Report to Committee (**CD4.21**) which states “*The Highway Authority considers all possible material highway impacts have been fully assessed and found to be acceptable and therefore has no objections subject to the imposition of conditions*”. [my emphasis added]

- 5.6 The NPPF then goes on at **Paragraph 111** to confirm that “*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.*”
- 5.7 As has clearly been evidenced in the Report to Committee (**CD4.21**), LBB Highways, in their role as statutory consultee on highway matters, considered that “all possible material highway impacts” had been assessed and “found to be acceptable” [my emphasis added]. There is clearly no conflict with either Paragraphs 110 or 111 of the *NPPF*.
- 5.8 The level to which the site can be considered to have safe and suitable access and negligible levels of highway traffic impacts are discussed further in this section.

**The London Plan (2021) – current adopted version – CD8.3**

- 5.9 The London Plan (2021) provides details at **Policy T4** on assessing and mitigating transport impacts.
- 5.10 This Policy is a wide-ranging policy that helps determining authorities to assess the transport impacts of developments and set out mitigation of the impacts.
- 5.11 Policy T4 states: -

**"POLICY T4: ASSESSING AND MITIGATING TRANSPORT IMPACTS**

*A Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.*

*B When required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans,*

*Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.*

*C Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.*

*D Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will be contingent on the provision of necessary public transport and active travel infrastructure.*

*E The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.*

*F Development proposals should not increase road danger."*

**LBB – Core Strategy (Adopted January 2012) – CD8.2**

- 5.12 This document is now quite dated given it was adopted in 2012, prior to the publication of the original version of the *NPPF*. The key focus of Policy CS15 is to "achieving an integrated and sustainable transport system".
- 5.13 Much of the policy focus is on the requirements of the Council e.g. to implement or provide certain sustainable transport measures.
- 5.14 The delivery of these integrated transport systems achieved by a number of elements being implemented. The key ones in respect to the development are paragraphs g, i and k as reproduced below: -

*"g adopting a parking policy that addresses the need for appropriate controls to secure a sustainable environment within the borough, whilst recognising the need to help viable development in town centres and major employment areas;*

*i encouraging walking and cycling within the borough through implementation of local and strategic walking and cycling programmes, school travel plans,*

*local safety schemes and the provision of facilities within development proposals and environmental improvement projects;*

*k effectively maintaining and managing the existing highway network to ensure the free flow of traffic, improve the environment, in particular air quality, and promote safety, health and wellbeing.”*

- 5.15 Paragraph g has been covered at length within the previous section.
- 5.16 Paragraph i sets out the need to encourage walking and cycling and the implementation of Travel Plans (for schools). Given the site is restricting car parking and is located in an accessible area, again it is considered that this paragraph has been covered. Notwithstanding that, a Travel Plan has been produced and is attached at **Appendix IWG** as previously discussed.
- 5.17 It is considered that against policy the alleged breach is with regards to paragraph k. This relates to maintaining and managing the existing highway network and to promote safety.
- 5.18 With respect to this, as will be evidenced, the site does not impact the local highway network to a level that would constitute a breach of this policy, nor significantly impede the free flow of traffic in comparison to the operation of the existing site uses. The design of the scheme has been such that travel to and from it is to be minimised as far as practicable, and the design of the site access junction has been subject to significant scrutiny throughout the planning process by both LBB Highways, as well as through an independent Stage 1 Road Safety Audit (RSA) undertaken by suitably qualified individuals (**CD3.14**). The design of the site access was ultimately deemed safe and suitable by LBB Highways as evidenced in their consultation response (**CD4.21**) and subsequently in the SoCG (**CD5.3**) and therefore it is considered that the site is not in breach of Policy CS15.

**LBB – Unitary Development Plan (UDP, adopted 2004, Addendums with updates in 2007 and 2012) – CD8.1**

5.19 **Policy T6** sets out a series of elements with regards to the review of development proposals and their impacts upon the local highway network.

5.20 Policy T6 states that: -

*"The Council will normally refuse any development proposals that would either cause local traffic flows to rise above the design flow for a road or would generate additional traffic on a road on which flows are already considered to exceed design flow, unless:*

*either the affected road is included in an improvement programme that would increase the design flows to a level capable of accepting increased demands from the base flow and the development or the applicant is prepared, and in a position, to undertake un-programmed road improvements, including traffic management and environmental measures, to increase the design flow capacity of relevant highway links to a level capable of safely accommodating increased demands from the development; and*

*there are no environmental, or other planning or road traffic objections to such highway improvements taking place.*

*(Calculation of base flow shall take account of developments permitted but not yet implemented.)"*

5.21 Review of this policy is contained within the following section of my Proof, but again it is noteworthy that LBB Highways did not request any additional traffic modelling to be undertaken throughout the application process at any stage having been content with the information contained within the TS. LBB Highways were however categorical in their summary to Committee (**CD4.21**) in that "all possible material highway impacts have been fully assessed and found to be acceptable".

- 5.22 Irrespective of the above, my evidence further clarifies this position.
- 5.23 It is therefore clear that the adherence with **Policy T6** has been met, and this is confirmed by LBB Highways Officers in their role as statutory consultee at both the planning application stage (**CD4.21**) and more recently through the SoCG (**CD5.3**). I concur with the LBB Highway Officer's position.

#### **Site Access and Egress - Background**

- 5.24 It is important to note that the position and design of the site access and egress has been subject to extensive discussion and a rigorous review process.
- 5.25 Following the preparation and submission of the planning application, LBB Highways was consulted in their role as a statutory consultee.
- 5.26 Within the original TS (**CD1.16**) the design of the access point was an in-bound entrance only at the southern end of the site, with the egress being an all-movement exit point towards the northern boundary of the site.
- 5.27 Following the submission of the application, LBB did provide comments on the acceptability of the site access junction design.
- 5.28 This resulted in an independent Stage 1 Road Safety Audit (**CD3.14**) being undertaken and modifications to the exit point to restrict right turning vehicles (**CD3.16**).
- 5.29 This design was agreed through these discussions and following submission of the additional work, LBB Highways Department did not offer an objection to the scheme.
- 5.30 LBB Highways Officer's consultation response (**CD4.21**) does not consider that the proposals are in any way unacceptable in this location, that access is deficient of safety, nor that there are expected to be unacceptable adverse impacts caused by this design.



5.31 Locational issues and highway safety would be matters falling within the remit of the Highway Department in their role as the statutory consultee on these matters. Again, this has since been confirmed through the SoCG (**CD5.3**) produced with LBB.

5.32 The committee report (**CD4.21**) summarises the response from the Highway Authority as follows: -

*"The Highway Authority considers all possible material highway impacts have been fully assessed and found to be acceptable and therefore has no objections subject to the imposition of conditions."*

5.33 The remainder of this section considers the relevant transport matters considered in relation to the design of the access / egress points, the intensity of movements and the safety and capacity of the network.

5.34 There are a number of broad areas that have been raised by the Rule 6 Party, which have been set out as follows: -

- Road Safety Audit and Design of the Access;
- Personal Injury Accident Data review of Danson Road;
- Control measures;
- Highway Impact.

#### **Design of Access / Egress and Road Safety Audit**

5.35 As designed and confirmed by LBB Highways both through the response at the planning application stage (**CD4.21**) and the SoCG (**CD5.3**), there is no indication that the design of the access / egress points is lacking in any way.

- 5.36 As has been highlighted above, the original design of the site access and egress point were all-movement access and egress points, much in the same way as occurs on the existing property driveways along Danson Road i.e. there are no restrictions on vehicle use levels, timing of movements or direction in which vehicles can turn.
- 5.37 There are four such property driveways encompassing the site, each leading to their own individual, large, driveway. This is consistent with other properties along this section of Danson Road on both sides of the carriageway and is a very common arrangement within urban areas on main roads subject to 30 and 40mph speed limits.
- 5.38 As has previously been identified an independent Stage 1 RSA (**CD3.14**) was undertaken along with amendments to the junction at the request of LBB Highways.
- 5.39 This was reflected within the Highways Technical Note (reference 190320-06, document **CD3.15**) submitted during the consultation period. The Stage 1 RSA was submitted as a separate document during the planning stage along with the accompanying Designer's Response (**CD3.14**) as is noted in the SoCG.
- 5.40 No significant issues of material concern were raised by the RSA, with only a single point raised regarding allowing for gaps within traffic for right turning vehicles out of the site. A recommendation for "Keep Clear" markings to be installed on the northbound lane of Danson Road was made, and the design was therefore revised in order to incorporate this recommendation. It is important to note that the RSA did not consider the prevention of right turning vehicles as being a recommendation of the audit.
- 5.41 At the request of LBB, further measures were introduced to prevent right turning traffic at the egress despite this not being a recommendation of the RSA.
- 5.42 The Highways Technical Note (**CD3.15**) provided an updated drawing to indicate how the kerblines at the egress point would be angled to encourage

left-out only movements from the site, along with enhanced signage. This also included changes requested as part of the Stage 1 RSA (**CD3.14**).

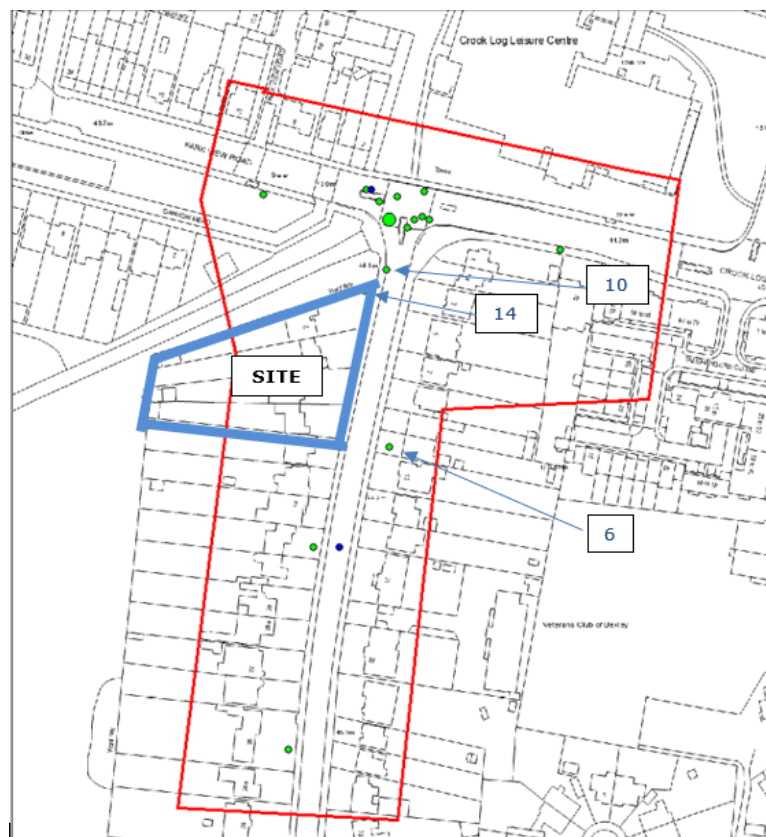
- 5.43 The proposed access design is provided on **ACE Drawing 190320-004 Rev B** as contained within the Highways Technical Note (document **CD3.15** and provided separately at **CD3.16**).
- 5.44 LBB Highways confirmed that the revised design along with the additional information provided was sufficient information and detailing to enable to consider the scheme favourably.
- 5.45 As has been outlined in the Highways Technical Note (**CD3.15**), there were additional measures proposed to be implemented to advertise and announce the restriction on turning right out of the site exit. This is covered in the next section.
- 5.46 The site egress has therefore been reviewed by an independent RSA team and LBB Highways, with all recommendations incorporated within the revised design of the egress point.
- 5.47 The existing site has four individual property driveways with no restrictions on turning movements into or out of the properties, two of which are to be closed as part of the scheme, with that closest to the signal junction to be the egress, with vehicles only permitted to turn left out of the site, while the entrance into the scheme will be via the access furthest from the signals.
- 5.48 LBB Highways has confirmed both at planning application stage (**CD4.21**) and through the SoCG (**CD5.3**) that the proposed site access and egress points are appropriate and would not be predicted to raise highway safety concerns. The position of the LHA in this regard should be afforded great weight.

### **Personal Injury Accident Data**

- 5.49 In the supporting TS (**CD1.16**), 12 no. Personal Injury Accidents (PIAs) were reported in close proximity to the development site in the period 2014-2018. All were recorded as "slight" in severity, with 7 occurring at the signal junction

of the Crook Log. There were no accidents recorded on the immediate site frontage of the development site, although a small number of accidents occurred slightly further south on Danson Road.

5.50 Detailed accident records have been obtained from TfL for the latest available 60-month period. These set out accident plots and summary information as to the location and suggested cause of the accident (a full version is provided at **Appendix IWK**).



**Figure 5 – Accident Data Plot (60 months to November 2021) (Source: TfL)**

5.51 The data from TfL indicates that a small number of PIAs have occurred along the frontage of Danson Road. In particular, the 3 no. closest accidents have been reviewed in more detail.

5.52 Accident labelled as number 6 (ref 01170009782) occurred when the driver of a vehicle travelling southbound failed to perceive the movement of a delivery

vehicle pulling away from the kerb and collided with the rear of it. It was suggested that the driver of the car failed to judge the situation.

- 5.53 Accident labelled as number 10 (ref 01180149946) occurred when a pedestrian (13 years old) was clipped by a car in a slow-speed situation. The causation of the collision was adjudged to have been as a result of the pedestrian failing to look properly.
- 5.54 Accident labelled as number 14 (ref 01190184384) occurred when a pedestrian (14 years old) was contacted by a vehicle in slow moving traffic. There were no specific details on how the collision occurred, but it was suggested that the pedestrian did not judge the movement of the vehicle.
- 5.55 The LBB conclusion based upon the details contained within the TS was that the site access design is safe, particularly when considering the changes proposed to restrict right turning vehicles out of the site (**CD3.15**).
- 5.56 The detailed accident review of the accidents in close proximity to the site frontage does not raise any issues in relation to turning vehicles at the proposed development site frontage, which would be a small increase in turning movements in comparison to the existing situation, with the number of accesses reduced from four to two.
- 5.57 It is noted that the Rule 6 Party raise the issue of a right turning vehicle at the site access being involved in a serious accident dated April 2019. Upon review of the accidents recorded, this PIA (accident 7 – ref 01190177108) occurred 126m south of the Crook Log junction. This is approximately around number 16 or 18 Danson Road and is the blue dot further south from the site shown on **Figure 5**.
- 5.58 There are around 70 properties along Danson Road between the junction of The Grove and the Crook Log junction. Each property by and large has its own driveway (or at the minimum a shared driveway). Accident 7 as detailed above is the only accident recorded in relation to a right turning vehicle leaving a

driveway and colliding with traffic moving along Danson Road within the interpreted listings obtained from TfL in the previous 5 years.

5.59 Again, it should be finally noted that this is a situation where there are no restrictions on any turning movements from any of these individual driveways, whether they are in close proximity to the Crook Log junction or not. The proposals seek to restrict and prevent right turning movements out of the site egress and in doing so will provide mitigation measures to restrict such turning movements in any case.

5.60 The TS (**CD1.16**) concluded that the proposed development would not exacerbate the existing accident rate around the site on the basis of the limited increase in traffic compared to the permitted land use. LBB Highways did not consider the site access location to be unsafe, confirming so in their response to Committee (**CD4.21**) and subsequently within the SoCG (**CD5.3**). Nor did the independent Stage 1 RSA (**CD3.14**) raise any concerns on these grounds.

### **Control Measures**

5.61 As outlined in the Highways Technical Note (**CD3.15**), Carebase as the site operator expect to advertise and enforce the restrictions to turning movements out of the site exit.

5.62 The summary measures are as follows:

- Kerb alignment to position vehicles so that a right turn is made difficult as shown on Drawing 190320-004 Rev B;
- Provide signage to advise of the left only turn out of the site;
- Orientate car parking spaces to encourage entry from the southern access and departure from the northern most access;
- Monitor the movement using CCTV (to be situated on-site);
- Introduce the right turn mitigation strategy (as shown within Appendix A of the Highways Technical Note – **CD3.15**);

- Management can enforce staff to exit left and remove parking rights for staff failing to adhere to the situation;
- Management can make visitors aware of the exit left arrangement when they sign in / out of the reception;
- Management can advise residents and families of the restrictions when they become residents as part of their contract;
- Provide information on the carehome website to inform of the left only exit; and
- Advise all suppliers of the left only exit.

5.63 A copy of the advertising document produced by Ardent and Carebase was contained within the document 190320-06 (**CD3.15**).

5.64 Again, it is reiterated that LBB Highways as the statutory consultee for highway safety and congestion matters considered the access designs to be safe and appropriate, and that the proposed mitigation measures (banned right turn) are acceptable to them. This has been confirmed through the consultation response at the planning stage and more recently through the SoCG (**CD5.3**).

5.65 The SoCG (**CD5.3**) includes a contribution of £7,697 secured via the proposed Section 106 Agreement towards *"the cost to the Council of additional mitigation measures as follows: Advertisement of TMO banning right turn out of the site at egress and right and left turn into the site at egress plus installation of all associated signage, posts, sign lights and electrical connections and implementation of keep clear markings at access"*.

5.66 All redundant crossovers at the existing site entrances are to be reinstated as full height kerbs.

### **Highway Impact**

5.67 The TS (**CD1.16**) showed that there would be a net increase of 10 and 8 two-way vehicle movements during the weekday AM and PM peak periods respectively, when taking account of the permitted/historic residential use at the site.

- 5.68 The 2007 document Guidance on Transport Assessments (GoTA), published by the DfT and former Department for Communities & Local Government, set out suggested thresholds above which the preparation of a TS or TA would be appropriate, based upon scenarios which would be expected to generate 30 two-way peak hour vehicle trips. Paragraph 2.11 stated: *Whilst there is no suggestion that 30 two-way peak hour vehicle trips would, in themselves, cause a detrimental impact, it is a useful point of reference from which to commence discussions.* Whilst this document was withdrawn in 2012, it has not been replaced by any new guidance. The predicted increase in traffic is well below 30 movements in each peak hour.
- 5.69 Count data from the Department for Transport (DfT) website (provided at **Appendix IWL**) from the most recent counts available (2021) for the peak hours on Danson Road (count site 26805) indicates the weekday network peak hour flows are as follows: -
- 08:00-09:00 = 1,696 two-way vehicles (923 northbound, 773 southbound); and
  - 17:00-18:00 = 1,919 two-way vehicles (971 northbound, 948 southbound).
- 5.70 This data has been compared to pre-pandemic levels from data in 2017 which showed: -
- 08:00-09:00 = 1,860 two-way vehicles (1,008 northbound, 852 southbound); and
  - 17:00-18:00 = 2,052 two-way vehicles (879 northbound, 1,173 southbound).
- 5.71 The impact of the predicted additional development traffic on the local highway network is therefore 0.5% and 0.4% during the AM and PM peak respectively, which is well within the generally recognised +/-10% daily variation of traffic on a road network.
- 5.72 An increase of +10% in peak hour traffic is generally regarded as material in terms of the impact on highway capacity and represents the typical day-to-day



variation in flows. Such an increase has historically been taken as the threshold for determining whether or not the impact of development traffic on highway capacity should be assessed, reduced to +5% in areas already subject to congestion, or expected to be within the timescale considered. The +5% and +10% thresholds were originally set out in the 1994 *Guidelines for Traffic Impact Assessment* published by the IHT.

- 5.73 The 1993 Guidelines for the Environmental Assessment of Road Traffic, published by the Institute of Environmental Assessment (IEA), also refer to the +/-10% daily variation and state that:

*"projected changes in traffic of less than 10% create no discernible environmental impact."*

- 5.74 The IEA Guidelines go on to state that an increase of +30% in traffic flows has a "slight" impact on severance, compared to +60% for a "moderate" impact, while a doubling (i.e. +100% increase) in flows, or the proportion of HGVs, is required to have a discernible impact particularly on noise levels."

- 5.75 On the basis of the above, the increase of well under 30 movements and below 1% above base flows on Danson Road shows that the additional traffic cannot be described as "severe" in the context of the NPPF 2021 (as referenced in paragraph 111).

- 5.76 TfL's Road Task Force has produced a number of Technical Notes on key issues within the Greater London Area. TfL Technical Note 10 *"What is the Capacity of the road network for private motorised traffic and how has this changed over time?"* (see appendix **IWM**) considers the question and provides details of TfL's position on road traffic volumes. This Technical Note refers to the *Design Manual for Roads and Bridges (DMRB)* document *TA 79/99 Traffic Capacity of Urban Roads*. *TA 79/99* provided information on link capacities, taking into account factors such as parking restrictions, bus stops, pedestrian crossings, frontage access, etc, and while now withdrawn, has not been replaced.

- 5.77 Table 2 within Technical Note 10 (extracted from TA 79/99) outlines the various road types and widths with corresponding peak hour flow link capacity. Danson Road is approximately 9m wide along the site frontage, and the characteristics of the road would place it within the road type of "UAP3". This includes a description as follows "variable standard road carrying mixed traffic with frontage access, side roads, bus stops and at-grade pedestrian crossings".
- 5.78 On this basis, the one-way flow capacity in the busiest direction (based on a stated 60:40 directional split) would be 1,530 vehicles per hour. Reviewing the data set out above, the highest recorded flow level in 2017 was 1,173 vehicles (southbound in the weekday PM peak hour). This is far below the theoretical capacity of the link. Values in 2021 are lower still.
- 5.79 Even with projected traffic growth of around 8% as established for the local area from the DfT Trip Ends Model Program (TEMPro) from 2017 to a future year of 2027, this would result in the busiest directional flow being around 1,270 vehicles, again still well below of the theoretical capacity of the road type considered here.
- 5.80 In summary, the expected increase of less than 30 vehicle movements and under 1% above baseline traffic flows on the local highway network resulting from the appeal scheme is well below the thresholds for detailed analysis and is not considered a "severe" impact in relation to the *NPPF*.
- 5.81 The site access has been designed to minimise interaction with traffic flows and queuing on Danson Road through providing the site entrance at the southern end of the site (furthest from the signals) and restricting right turning out of the site. The current situation has four independent points of access with no restrictions on movements or level of intensity, which will be reduced to two under the appeal scheme, although it is accepted that there will be more movements as a result of the development than the existing housing, overall.
- 5.82 The impact of the development in highway terms has been accepted by the statutory consultee, LBB Highways, with no material concerns raised by the

independent Stage 1 RSA (**CD3.14**), and confirmed to the planning committee (**CD4.21**) and subsequently through the SoCG (**CD5.3**).

- 5.83 Notwithstanding the fact that LBB Highways has accepted the proposals will not have a severe detrimental effect on junction capacity, it should be noted that in the peak hour of travel as outlined in the TS (**CD1.16**) submitted with the application, there would be an additional 10 vehicles (two-way) on the local road network. Even if all these vehicles travelled through the Crook Log junction, that is only one additional vehicle every 6 minutes at the junction. That simplistic consideration will be lessened by traffic arriving from the south that will not pass through the junction.
- 5.84 As outlined in the Highways Technical Note (**CD3.15**) the consideration accepted by LBB Highways was that around 50% of traffic would come to / from the south. This is considered reasonable given the Danson Road traffic data shows a broad 50:50 split throughout the day.
- 5.85 At the Crook Log junction, the proportion of traffic that has reached the junction has been assumed to distribute equally east and west (thereby distributing 25% of the total vehicles in each direction) – this was agreed during the planning application with LBB Highways. The impact of the additional traffic has therefore been considered by LBB Highways on the local highway network.
- 5.86 Restricted movements at the junction will limit the turning of vehicles to left-out egress only. This has been agreed as acceptable by LBB Highways. This will be supported by a range of advertising and through monitoring of the exit, along with the design of the junction to deter right turners. The alternative routes available to vehicles wishing to travel south are considered further.

### **Alternative Routes**

- 5.87 As was identified in the Highways Technical Note (**CD3.15**) the LBB Highways requested consideration of alternative routes for vehicles wishing to travel south from the site that would be prevented from turning south at the egress.

5.88 To this end, 3 principal options were identified. These are set out in the Technical Note but are summarised as follows: -

- Turning left at the Crook Log junction and then turning into Danson Mead before returning onto Park View Road to turn right at the Crook Log junction;
- Turning right at the Crook Log junction before turning into Dallin Road and then Sydney Road and The Grove before turning left onto Danson Road; or
- Turning right at the Crook Log junction before turning right into Upton Road and heading south to the A2.

5.89 The decision on which route will be taken will largely depend upon the driver and their end destination. However, satellite navigation is now common and if used, will route the driver on the quickest route available at the time of day and considering the local road conditions.

5.90 As identified in the Highways Technical Note (**CD3.15**), based upon the distributions and predicted increases in vehicle traffic from the TRICS database (see figures 2.1 and 2.2 of the Highways Technical Note). The volume of traffic requiring such alternative routes in the peak hours (when most vehicles are to leave the site) was no more than 4 vehicles. When split onto these routes the effects would not be discernible from daily traffic volumes.

5.91 There are no inherent safety issues on these routes that would be considered a cause for concern by the additional peak hour movements of a small proportion of trips (fewer than 5 vehicles in an hour) wishing to head south and having to use alternative routes.

5.92 As has been confirmed by LBB Highways through the report to committee (**CD4.21**) and the SoCG (**CD5.3**), the effects of the development on the surrounding road network are not considered to be severe in NPPF terms.

### **Additional Considerations**

- 5.93 The representation on behalf of Miss Harpreet Briaah of 5 Danson Road has been received. In her representation she makes clear that she has concerns regarding highway safety and parking provision and the impacts it would have on her care and disability access at 5 Danson Road.
- 5.94 I will not repeat the points made in relation to the highway safety aspects of the site access / egress points that have been covered previously and agreed as acceptable and safe by LBB, nor the level of parking provision which has been demonstrated to be adequate, and again agreed with LBB as appropriate.
- 5.95 Miss Briaah's concern relating to parking overspill alleges that staff and visitors will park along Danson Road and therefore jeopardise access to her property. However, Danson Road has consistent double-yellow lining along its length which would prevent parking use by staff and visitors. Notwithstanding the above, it has been demonstrated and agreed with LBB that the parking level is sufficient for the land use being proposed.
- 5.96 Miss Briaah's concerns also relate to the impact of additional development traffic on emergency response times. As has been evidenced in the previous section, the proposals are predicted to increase peak hour traffic by up to 10 vehicles in the busiest hour (an additional vehicle every 6 minutes on average). By and large the change in traffic from the Appeal scheme would be single figure vehicles per hour. Such a level of traffic increase has been demonstrated to be well within daily traffic fluctuation levels, and the impact of the development has been accepted by the statutory party responsible for the maintenance of road operation, LBB Highways as appropriate, and not severe.
- 5.97 Whilst I appreciate Miss Briaah's concerns relating to development impacts upon her situation, it is my considered opinion that this development would not jeopardise her care.

## **6. Conclusions**

- 6.1 It is considered that the proposed development accords with the relevant London Plan and LB Bexley policies. It is also in accordance with paragraphs 110 and 111 of the NPPF.
- 6.2 Evidence has been provided that access can be provided to the site by all modes safely.
- 6.3 The specific nature of the facilities will result in residents remaining on site and not leaving the site unoccupied. The design of the facilities is such that residents are provided with everything they require for day to day living.
- 6.4 Bus stops can all be accessed within TfL's guidance on maximum walking distances in the calculation used in the PTAL assessment and are close to the limits for the nearest railway station. These routes offer access to employees and visitors to the site by non-car modes. Walking and cycling are also viable alternatives to the private car.
- 6.5 A Travel Plan is to be introduced at the site to encourage sustainable travel and reduce the reliance on the private vehicle, particularly for staff. This will be supported at a senior level by Carebase management through incentives. This is secured via draft condition 17.
- 6.6 Car parking for disabled motorists and electric charging spaces (draft condition 14) are to be provided in accordance with the required standards, and cycle parking too will adhere to requirements (draft condition 16). The level of on-site car parking provision is ample for expected demand based on surveys of other existing comparable sites and the TRICS database. In the unlikely event parking overspill did occur (which is not my view), it could be accommodated on-street as evidenced by parking stress surveys.
- 6.7 Car Park Management and Servicing and Delivery Management Plans are expected to be conditioned for the site.

- 6.8 The proposed access and egress arrangements involve a reduction from the current four accesses to two, with that furthest from the signals for entering traffic, and that nearest for egress only, restricted to left turning out of the site. The proposed arrangements have been subject to an independent Road Safety Audit which raised no material issues of concern and LBB has no objection in its capacity as LHA. A contribution to be secured via Section 106 Agreement is to be made to implement the required Traffic Management Order and appropriate signage and markings.
- 6.9 The predicted net increase in weekday peak hour traffic associated with the scheme is well below the suggested threshold of 30 movements set out in national guidance, and at under 1% above base flows is well within the typical daily variation of +/-10%.
- 6.10 The professional judgment of the LBB Highways Department is that the scheme should be granted planning permission, as confirmed within the signed Statement of Common Ground.
- 6.11 I consider that the scheme is in full accordance with the Policies identified within my evidence, and there is no reason to withhold consent for the scheme on highways and transportation grounds.
- 6.12 Based upon the above and the evidence contained herein, it is my professional judgment that this scheme should be granted planning permission and that the reasons raised by the Rule 6 Party to refuse the scheme are not merited.