

**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**

**SUMMARY PROOF OF EVIDENCE: TRANSPORT**

**Of Ian Wharton**

**BA (Hons) MCIHT**

**REPORT REF.  
190320-11**

**NOVEMBER 2022**

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## 1. Scope of Evidence

- 1.1 This Summary Evidence should be read in conjunction with my main evidence (190320-10).
- 1.2 The planning application 19/03072/FULM was recommended for approval by LBB officers, with no objection raised on highways grounds. The application was refused at committee, with six reasons cited in the decision notice.
- 1.3 LBB has confirmed they will not be contesting any of the reasons for refusal, including those relating to highway safety, congestion and car parking.
- 1.4 Paragraph 111 of the *NPPF* advises: -  
  
*"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."*
- 1.5 LBB confirmed within the *Committee Report* that "all possible material highway impacts have been fully assessed and found to be acceptable".
- 1.6 A SoCG confirms that LBB find no harm or severity of impact on highway safety, congestion or parking grounds.
- 1.7 Significant weight should be given to LBB's position offering no objection to the scheme at planning and confirming through the SoCG that the highway impacts are satisfactory. It is LBB's duty is to assess the impact of development on the local highway network including highway safety, congestion and parking.
- 1.8 The Rule 6 Party raise issues in relation to Road Safety and Parking which largely follow the original reasons for refusal.

## **2. Location of Development**

- 2.1 The site is contained within a PTAL 3-4 (“moderate” to “good”). Bus services operate extensively in the area, running from early morning to late evening inclusive of weekends.
- 2.2 Over 500,000 working age people are within a 60-minute public transport journey of the site.
- 2.3 Carebase’s data from Heathfield Court, shows 41% of staff are located within 1-mile and 67% within 2-miles of the carehome – commutable distances on foot. 79% of staff reside within 3-miles of Heathfield Court – commutable distance by cycle.
- 2.4 Cycle parking is provided to standards and secured via condition for the approval of spaces and their installation prior to first occupation.
- 2.5 58% of the Heathfield Court residents have been referred from within a 3-mile radius of the carehome. This gives visitors the opportunity to travel by public transport, walking or cycling to the carehome.
- 2.6 The site is well-located for travel by non-car modes given its access to public transport and the large local residential population. Location of a development affects its traffic impacts and required parking provision.

### 3. Consideration of Parking Provision

- 3.1 The current London Plan does not include specific standards for carehomes but 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".*
- 3.2 Policy T6 qualifies that car-free development should be the starting point for any development proposal, in areas well-connected to public transport and the absence of on-street parking restrictions should not be considered a barrier to restricting car parking at development sites.
- 3.3 The evidence-based approach as is also reflected in the Draft Bexley Local Plan parking standards at Policy DP23.
- 3.4 Paragraph 4 identifies for specialist housing for older people that a "case by case" review will be undertaken within the context of PTAL and the characteristics of the carehome and informed by a TS.
- 3.5 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 and visitor levels.
- 3.6 The scheme is consistent with emerging Policy DP23.

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

- 3.7 Parking demand has been calculated using the TRICS database and a survey undertaken at the nearest Carebase facility. Both calculations show the proposals include sufficient parking on site to accommodate demand.
- 3.8 Other Carebase facilities indicate parking provision levels similar to the proposals.
- 3.9 The evidence shows that there is sufficient on-site car parking provision for visitors and staff. This will prevent overspill car parking from occurring.

3.10 This level of parking and approach to provision has been accepted by LBB at planning and within the SoCG.

### **On-Street Capacity**

3.11 The sufficiency of car parking spaces on-site will prevent overspill car parking from occurring. For completeness, parking beat surveys were undertaken showing occupancy equating to around 180 available parking spaces on roads within 500m of the site.

3.12 Parking provision has been demonstrated to be sufficient, however, even if any overspill demand did occur, then there is available on-street capacity in the surrounding area to withstand the small number of additional vehicles that would be displaced. This approach is consistent with London Plan Policy T6 and draft Bexley Local Plan Policy DP23.

3.13 The implementation of a Staff Travel Plan would further seek to reduce the need to travel by car.

### **Servicing Trips**

3.14 Servicing trips account for a small proportion of trips of a carehome. The Heathfield Court parking survey results show only one servicing vehicle was recorded on a typical day.

3.15 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. Access to the site is achievable by vehicles up to a 7.5t van size.

3.16 CPMP and SDMPs are to be conditioned which will detail the allocation of parking spaces and set out delivery patterns for the site.

## 4. Development Impact

### NPPF

- 4.1 The proposed development was adjudged by LBB during planning to have complied with Paragraph 110 and 111 of the NPPF. This has since been confirmed through the SoCG.
- 4.2 The Report to Committee 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*".

### London Plan (2021)

- 4.3 The London Plan provides details at **Policy T4** on assessing and mitigating transport impacts. It is a wide-ranging policy that helps determining authorities assess the transport impacts of developments and set out mitigation measures.

### LBB – Core Strategy

- 4.4 **Policy CS15** requires: -

*"k effectively maintaining and managing the existing highway network to ensure the free flow of traffic."*

- 4.5 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 when compared to the existing site. The scheme seeks to minimise travel by car, and the design of the site access/egress has been scrutinised by both LBB and an independent RSA. The design of the site access was deemed safe and suitable by LBB at planning and in the SoCG. It is considered that the site is not in breach of Policy CS15.

### LBB – UDP

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

- 4.7 LBB confirmed that “all possible material highway impacts have been fully assessed and found to be acceptable” through the comparison of traffic flows undertaken.
- 4.8 It is therefore clear that the adherence with **Policy T6** has been met, and this is confirmed by LBB at the planning application stage and via the SoCG.

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

- 4.9 Access and egress points were all-movement junctions in the original submission, as occurs at the existing (four) property driveways i.e. no restrictions on movements.
- 4.10 An RSA was undertaken, and no significant issues were raised. A recommendation for “Keep Clear” markings was accepted with the design updated. The RSA did not consider the prevention of right turning vehicles as being necessary, although LBB requested this addition.
- 4.11 LBB has confirmed through the SoCG that the proposed site access and egress points are appropriate and would not be predicted to raise highway safety concerns. The position of LBB in this regard should be afforded great weight.

#### **Accident Data**

- 4.12 Detailed accident records have been obtained from TfL for the last 5 years with no specific accident trend being identified from the data that would be exacerbated by the proposals.
- 4.13 An accident recorded around 125m south of the Crook Log junction did involve a right turning vehicle out of an access point. There are some 70 properties along Danson Road between Crook Log and The Grove, with this the only such accident recorded in 5 years.
- 4.14 There are no restrictions on turning movements from any driveways along Danson Road. The proposals seek to ban right turning movements out of the site which will simplify vehicle movements at the egress.



4.15 LBB did not consider the site access location to be unsafe at planning nor within the SoCG. The RSA did not raise any concerns that have not been addressed.

### **Control Measures**

4.16 Carebase expect to advertise and enforce the restrictions to turning movements at the site exit.

4.17 LBB considered the access designs to be safe and appropriate, with the mitigation measures acceptable. This has been confirmed through the SoCG, including a contribution towards implementing signage and lining.

### **Highway Impact**

4.18 The TS showed that there would be a maximum net increase of 10 two-way vehicle movements during the weekday AM peak period, well below 30 movements in each peak hour set out in the DfT's *Guidance on TAs*.

4.19 2021 Count data from Danson Road (site 26805) has been compared to pre-pandemic levels (2017). The impact of the additional development traffic on traffic flows is predicted to be around 0.5%, far below +10% in peak hours which represent the typical daily variation in flows.

4.20 TfL Technical Note 10 provides details of road capacity using TA 79/99 guidance on link capacities, using localised road characteristics. Danson Road is a road type "UAP3". The one-way flow capacity in the busiest direction would be 1,530 vehicles per hour which is not exceeded in 2017 or 2021 data inclusive of the proposals.

4.21 Even if all additional vehicles travelled through the Crook Log junction, this is one additional vehicle every 6 minutes.

4.22 The impact of the additional traffic has been considered by LBB as a minimal change in traffic flows compared with the baseline. The increase of 10 peak hour vehicles (less than 1% of baseline traffic) is considered not to be "severe".

**Alternative Routes**

- 4.23 Three alternative routes have been considered for traffic wishing to travel south from the site. The decision on which route will be taken will largely depend upon the driver and their end destination.
- 4.24 The volume of traffic requiring such alternative routes in the peak hours was no more than 4 vehicles - imperceptible from daily traffic variations.

**Additional Considerations (Miss Briah's representation)**

- 4.25 Danson Road has double-yellow lining along its length preventing parking use by staff and visitors. LBB agree that the parking level is sufficient for the proposals.
- 4.26 Emergency response times would not be predicted to change traffic within daily traffic fluctuation levels, and the impact of the development has been accepted by LBB.
- 4.27 It is my considered opinion that this development would not jeopardise Miss Briah's care.

## **5. Conclusions**

- 5.1 The professional judgment of LBB is that the scheme should be granted planning permission, as confirmed within the SoCG.
- 5.2 I consider that the scheme is in full accordance with the appropriate Policies, and there is no reason to withhold consent for the scheme on highways and transportation grounds.
- 5.3 Based upon my professional judgment this scheme should be granted planning permission and that the reasons raised by the Rule 6 Party to refuse the scheme are not merited.