

Redrow Homes Limited  
**265 Burlington Road, New Malden**  
Proof of Evidence Mike Savage

Final | 9 November 2020

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 274852-00

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**ARUP**

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# 1 Experience

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## 1.1 Mike Savage

- 1.1.1 I am a Chartered Member of the Institute of Logistics and Transport. I hold an Honours Degree in Civil Engineering; a Master of Science in Transport Planning and Management and I am also a Member of the Chartered Institution of Highways and Transportation.
- 1.1.2 I am a Director at Arup working in the transport team based in the London office. I have 30 years' professional experience providing transport planning advice to clients in relation to development proposals and transport strategies.
- 1.1.3 I provide transport planning advice to developers and local authorities throughout all stages of the planning process. This includes pre-application and post-application discussions with planning and highways authorities and preparation of Transport Assessments to support planning applications.
- 1.1.4 I am instructed by Redrow Homes Limited (hereafter referred to as Redrow) to act as an expert witness in matters relating to transport and highways.
- 1.1.5 I was approached by the client to provide expert witness evidence for this Inquiry in March 2020. Prior to that stage I had not been involved in the project.

## 1.2 Declaration of Truth

- 1.2.1 I confirm that the evidence which I have prepared and provide for this application in this proof of evidence is true and has been prepared and is given in accordance with the guidance of my professional institute. I understand that my duty is to provide my untrammelled professional opinion to the inquiry, irrespective of by whom I am instructed. Accordingly, I confirm that the opinions expressed within this proof are my true and professional opinions.

## 2 Scope of Evidence

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- 2.1.1 My evidence covers transport issues relating to the proposed development.
- 2.1.2 There were no transport related objections raised by London Borough of Merton officers to the proposed development and officer recommended approval within the committee report dated 13 February 2019.
- 2.1.3 Councillors at the committee resolved against the officer's recommendation and subsequently have drafted the following reasons for refusal, these are:

*1. The proposals by reason of the number of units proposed, the location of the main vehicle access coupled with the prevailing intermittent road congestion arising from the operation of the nearby level crossing, and in the absence of a controlled parking zone or other additional parking controls operating locally, would be likely to:*

- Exacerbate potential for congestion, already prevalent in the vicinity of the application site and at the nearby junction of West Barnes Lane and Burlington Road, precipitated by the level crossing that results in significant queuing, impacting on the road and various junctions and more so at the existing egress to the site, leading to a harmful impact on the overall environment including safety and the efficient operation of the highway network within the vicinity of the appeal site. The proposals would contribute towards a motorised vehicle dominant environment which diminishes the quality of environment for pedestrians and cyclists and does not encourage sustainable modes of movement.*
- Exacerbate pressure on kerbside parking locally to the detriment of the amenities of existing residents, as a controlled parking zone or other additional parking controls operating locally, could not be implemented unilaterally by the Council as Traffic Authority on the basis of a S106 undertaking, any such proposal being subject to consultation processes and Cabinet member approval and thus any outcome cannot be pre-judged.*

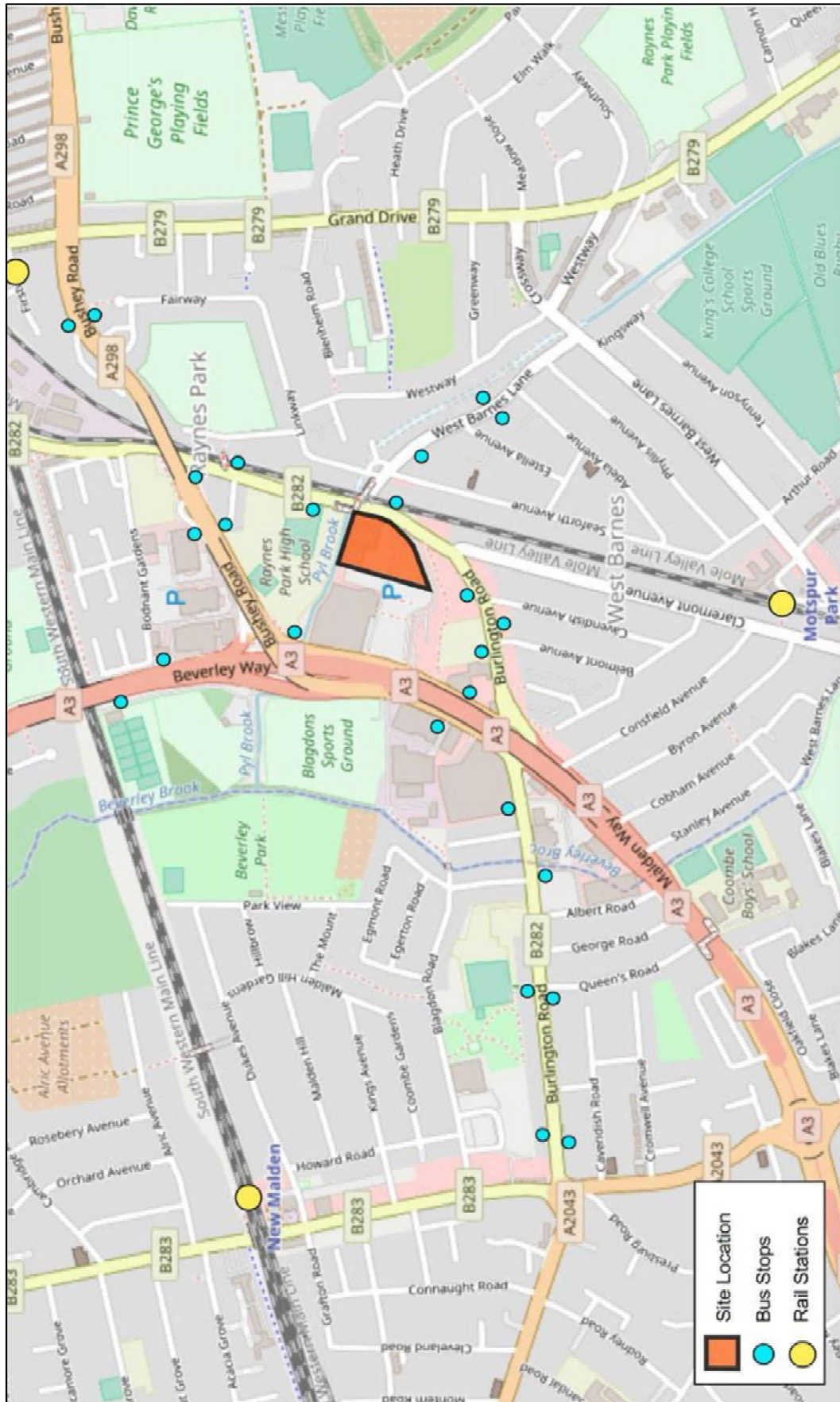
*The proposals would be contrary to policies 6.3 and 6.10 of the London Plan (2016), policies CS18 and CS20 of the Merton Core Planning Strategy (2011), and policy DM.T2 of the Merton Sites and Policies Plan (2014).*

*2. Notwithstanding metropolitan planning objective of optimising housing potential, as set out in policy 3.4 of the London Plan, the proposals by reason of their size, massing and bulk, would result in an overdevelopment of the site that would be overly dominant and unduly prominent, failing to relate positively and appropriately to local character to the detriment of the visual amenities of the area and failing to deliver a housing development of the highest quality in relation to its context.*

*The proposals would be contrary to policies 3.5, 7.4 and 7.6 of the London Plan (2015), policy CS.14 of the Merton Core Planning Strategy (2011), and policy DM.D2 of the Merton Sites and Policies Plan (2014).*

- 2.1.4 My evidence addresses the first reason for refusal and relies upon the work undertaken by Mott McDonald in preparing the Transport Assessment [CD8.5 *Transport Assessment May 2019*]
- 2.1.5 In addition, to the south and west of the commercial premises is further car parking associated with the adjacent Tesco store. Tesco is located immediately to the west of the proposed development site and includes car parking to the south of the store, as well as a small element of car parking comprising 98 spaces which will be redeveloped and form part of the proposed site. Tesco has confirmed that it does not require these spaces which are located on the proposed site and will retain 577 spaces to serve the store on the adjacent site. I am advised that the loss of the 98 spaces will have no impact upon the usual operation of the store and upon the trips that it presently generates (see letter in Appendix D).
- 2.1.6 The site is served by a single access, which is formed of a priority all movement junction with Burlington Road on the eastern boundary, broadly in the centre of the site. This junction also facilitates pedestrian access to and from Tesco as well as acting as a secondary vehicular egress point from the store. The principal Tesco access junction is formed to the west and comprises a left-in left-out junction with Beverley Way which runs parallel to the A3 on the western boundary of the site.
- 2.1.7 A site location plan can be seen in Figure 1.

Figure 1: Site Location Plan

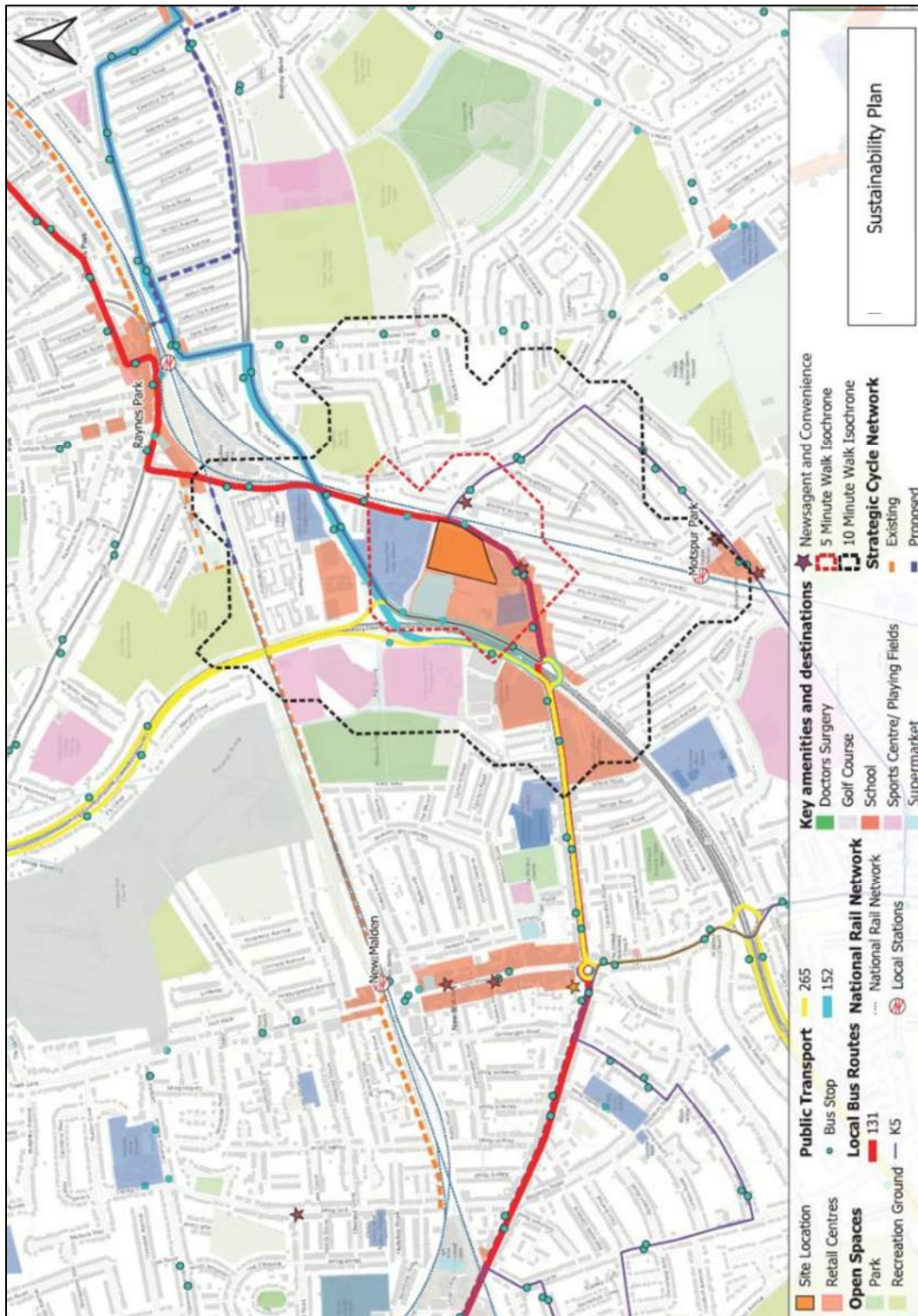


## 2.2 Pedestrians

- 2.2.1 All local roads in the vicinity of the site, including Burlington Road, West Barnes Lane, Beverley Way and Claremont Avenue are lit and include appropriately dimensioned footways adjacent to the carriageway.
- 2.2.2 The nearest bus stops are within a two-minute walk of the site entrance, located on Burlington Road. The bus stops are accessible via the footways from the site on Burlington Road. Both controlled and uncontrolled crossings points are provided for pedestrians. Tactile paving is provided at crossing points and recent improvements to the Shannon Corner roundabout help facilitate the movement of pedestrians and cyclists through the network.
- 2.2.3 Access to local facilities, including retail, education and public transport is illustrated in Figure 2. It can be seen that the site is well located for local facilities.



Figure 2: Sustainability Plan



## 2.3 Cyclists

- 2.3.1 There are some existing cycleways on the streets around the site. Advanced Stop Lines are provided at all signal-controlled junctions in the vicinity of the site. Cycle parking is available at all three railway stations in the study area and at key locations, like Tesco and at New Malden High School. Figure 3 below shows strategic cycle routes relative to rail stations and the local area, whilst Figure 4 shows routes recommended for cyclists using TfL Cycle maps.
- 2.3.2 Parking is nonetheless ubiquitous in the conurbation and for those who wish to travel by bike a wide range of facilities are readily accessible by this mode notwithstanding that there is not a comprehensive coverage by cycleways. I note that there have been a number of initiatives this year in the wake of the Covid crisis to encourage more cycling (such as removal of traffic lanes in nearby Kingston), with the use of electric bicycles being seen as a potential ‘game changer’.

Figure 3: Cycle Map

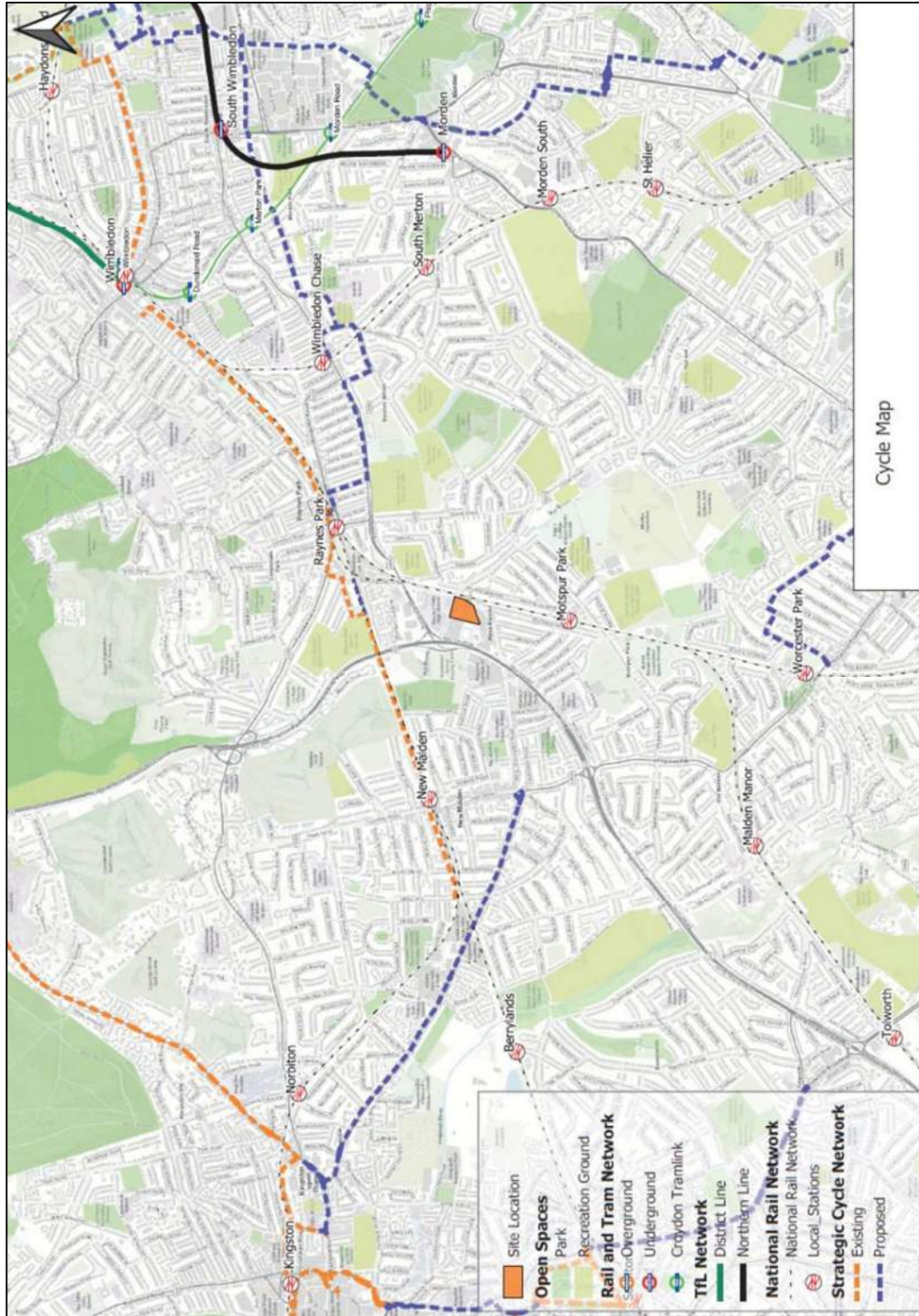


Figure 4: TfL Cycle Map



## 2.4 Public Transport

2.4.1 There are four bus services within 400 metres of the site, serving local routes within Merton and routes into Central London.

Table 1: Existing Bus Services

Bus Service	Nearest Stop	Walking distance from site (metres)	Frequency (Bph)	Walk Time to site (mins)
131	West Barnes Level Crossing	213	8	3
265	New Malden Tesco	400	5	5
152	New Malden Tesco	400	5	5
K5	West Barnes Level Crossing	213	1	3

2.4.2 The routes are:

- 131 – east-west service from Fairfield Bus Station in Kingston-upon-Thames to Tooting Broadway in the east;
- 265 – north-south service, from Putney Bridge in the north, through to Tolworth in the south;
- 152 – east-west service from Pollards Hill in the east routing through Mitcham, Colliers Wood and Wimbledon, terminating at New Malden to the west; and
- K5 – east-west service from Ham in the north west, through Kingston and New Malden, serving Motspur Park Station to Morden Station in the east.

2.4.3 In addition, the site is around a 12-minute walk to Motspur Park rail station, and a 16-minute walk to Raynes Park rail station. Crossrail 2 is at a very early stage, but the current prospective alignment stops at both of these stations. There is therefore potential for the site to become more accessible in later years, if the proposed CR2 scheme goes ahead with this alignment option. Nonetheless, because of the very early stage of this project, and current uncertainties over its support from Government I have not taken account of this potential to increase the

site's already good accessibility profile when assessing it for the purposes of this appeal.

2.4.4 Table 2 outlines the local bus services used for the PTAL calculations and outlined in Table 1 and Table 2.

Table 2: Existing and future rail services

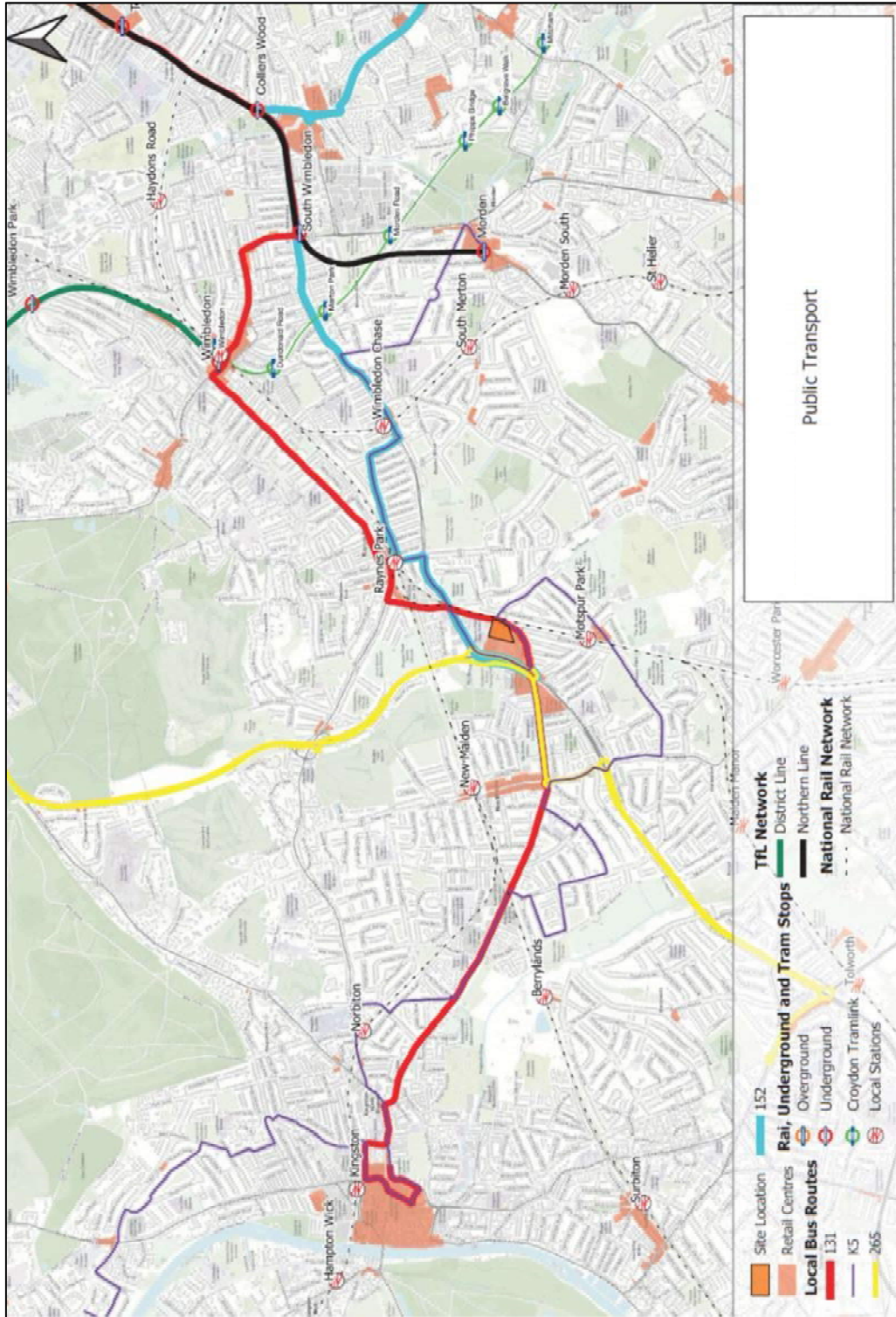
Rail Station	Walking Distance from site (metres)	Frequency, one-way (tph)	Walk Time (mins)
Motspur Park – National Rail	750m	12	9 minutes
Raynes Park	1300m	19	16 minutes
Motspur Park – Crossrail 2 <sup>1</sup>	750m	Up to 10	9 minutes
Raynes Park- Crossrail 2 <sup>2</sup>	1300m	Up to 20	16 minutes

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<sup>1</sup> <https://crossrail2.co.uk/stations/raynes-park/>

<sup>2</sup> <https://crossrail2.co.uk/stations/motspur-park/>

Figure 5: Local Public Transport Services Network Map

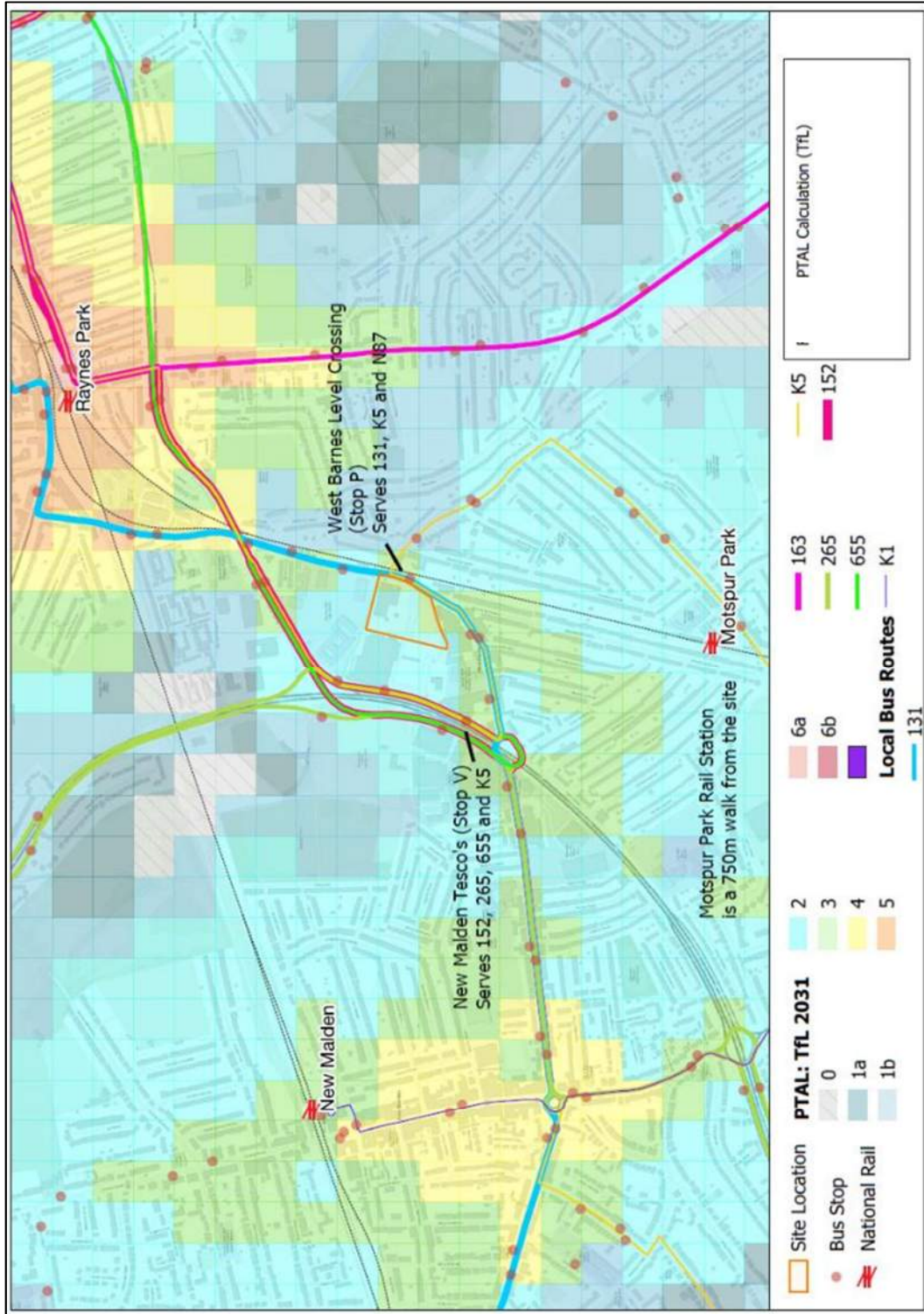


## 2.5 Existing and Future PTAL

- 2.5.1 The TA assessed the existing public transport accessibility of the site using TfL's online WebCAT planning tool. The TA appraisal found that the majority of the site is PTAL 3, but with the western part of the site resulting in a PTAL 2 as shown in Figure 6.
- 2.5.2 Whilst paragraph 10.6.4 of the Intend to Publish London Plan (CD2.2) states that in connection with parking standards for instance, the highest existing or future PTAL should be used, the grid-based structure of WebCAT planning tool does not always represent site specific accessibility accurately. It is therefore best practise to verify the PTAL scores of a site using manual calculations, which can identify where pedestrian connections or services may be missing in calculations.



Figure 6: Existing PTAL (WebCAT Output)



2.5.3 Due to the grid-based structure, the WebCAT tool does not for example include Motspur Park for the PTAL calculation of the western part of the site, and is instead reliant on bus routes 131, 152, 265 and K5 accessed via bus stops at West Barnes Lane Crossing and New Malden Tesco. The services included in the WebCAT calculation for the western part of the site are provided in Table 3.

Table 3: Public Transport Services included (WebCAT)

Mode	Stop	Route	Frequency (vph)
Bus	WEST BARNES LN CROSSING	131	7.5
Bus	NEW MALDEN TESCO'S	265	5
Bus	NEW MALDEN TESCO'S	152	5
Bus	WEST BARNES LN CROSSING	K5	1

2.5.4 A revised assessment of public transport accessibility levels (PTAL) levels has therefore been manually undertaken to verify the actual level of accessibility for the site. This manual assessment found that the walking distance to Motspur Park is around 750m, roughly a nine-minute walk from the site. Including Motspur Park (with onward connections to London Waterloo, Chessington South, Dorking and Guildford) into the manual PTAL analysis the site is considered to achieve PTAL 3 throughout. I would add that it is well recognised from multiple surveys that nationally most journeys of under a mile are on foot.

2.5.5 The public transport services included in this manual assessment are provided in Table 4.

Table 4: Public Transport Services included (Manual PTAL Assessment)

Mode	Stop	Route	Frequency (vph)
Bus	WEST BARNES LN CROSSING	131	7.5
Bus	NEW MALDEN TESCO'S	265	5
Bus	NEW MALDEN TESCO'S	152	5
Bus	WEST BARNES LN CROSSING	K5	1
Rail	Motspur Park	Waterloo - Dorking	2
Rail	Motspur Park	Dorking - Waterloo	1
Rail	Motspur Park	Waterloo - Epsom	0.33
Rail	Motspur Park	Guildford - Waterloo	1.33
Rail	Motspur Park	Waterloo - Guildford	1.67
Rail	Motspur Park	Effingham - Waterloo	0.67
Rail	Motspur Park	Epsom - Waterloo	1
Rail	Motspur Park	Waterloo – Chessington South	2
Rail	Motspur Park	Chessington South - Waterloo	2

2.5.6 Raynes Park is around 1300 m to the north, which is beyond the walk 'limit' assumed for the PTAL calculations of 960m but is nonetheless around a 16-minute walk from the site. In reality, some residents will walk to and from Raynes Park station as it would only be 7 minutes longer than walking to Motspur Park. The frequency of trains at Motspur Park is every 5 minutes whereas at Raynes Park there are trains every 3 minutes. This flexibility and resilience available to residents will encourage more to utilise public transport.

2.5.7 The WebCAT tool also includes anticipated changes in future year service frequencies. It should be noted that some minor bus service frequency improvements are anticipated from 2021. WebCAT does not however reflect the s106 commitment made by this development to contribute to further improvements to services, which includes a £450,000 contribution to providing an additional bus journey in each peak period.

2.5.8 Crossrail 2, if given the go ahead, will further improve public transport accessibility to the site, however this is not anticipated to result in an

increase in PTAL level and in any event is at a very early stage with the timing of its delivery very uncertain.

- 2.5.9 Overall the site has good access by walking, cycling, and public transport, having four frequent bus routes that serve the site and access to a number of rail stations. The site has a PTAL of 3 but this does not take into account access to Raynes Park station which is just 16 minutes walk (but over the threshold walking distance for PTAL). The site is accessible with access to a range of local facilities as described within the Transport Assessment and illustrated in Figure 2 of this proof

## 2.6 Highway Network and Car Parking

- 2.6.1 The site is located off Burlington Road, which forms the eastern boundary of the site. The A3 runs in a north-south direction to the west of the Tesco site and the A298 forms a grade separated junction north west of the Tesco store and runs from the A3 in a north-east direction. Burlington Road runs from the Fountain Roundabout in the west through the Shannon Corner junction with the A3/Beverley Way running roughly east turning north and form the eastern boundary of the site. Burlington Road runs to the junction with West Barnes Lane which continues north beneath the A298 towards Raynes Park.
- 2.6.2 The principle vehicular access for Tesco is from the southbound slip road between the A298 and Shannon Corner running parallel to the A3 (designated the B282). The Tesco access from the B282 is left in left out, and customers are able to egress to the east onto Burlington Road through the proposed site. The Tesco's site access from Burlington Road is one way eastbound.
- 2.6.3 There are three local CPZs within the LB Merton relevant to the site. These are zones RP, WB1, and WB2. The restrictions of each are listed below, these have also been marked up on Figure 7:
- RP: Mon – Fri, 08:30 – 18:30
  - WB1: Mon – Sat, 07:00 – 19:00
  - WB2: Mon – Fri, 10:00 – 16:00

## 2.7 Parking Survey Data

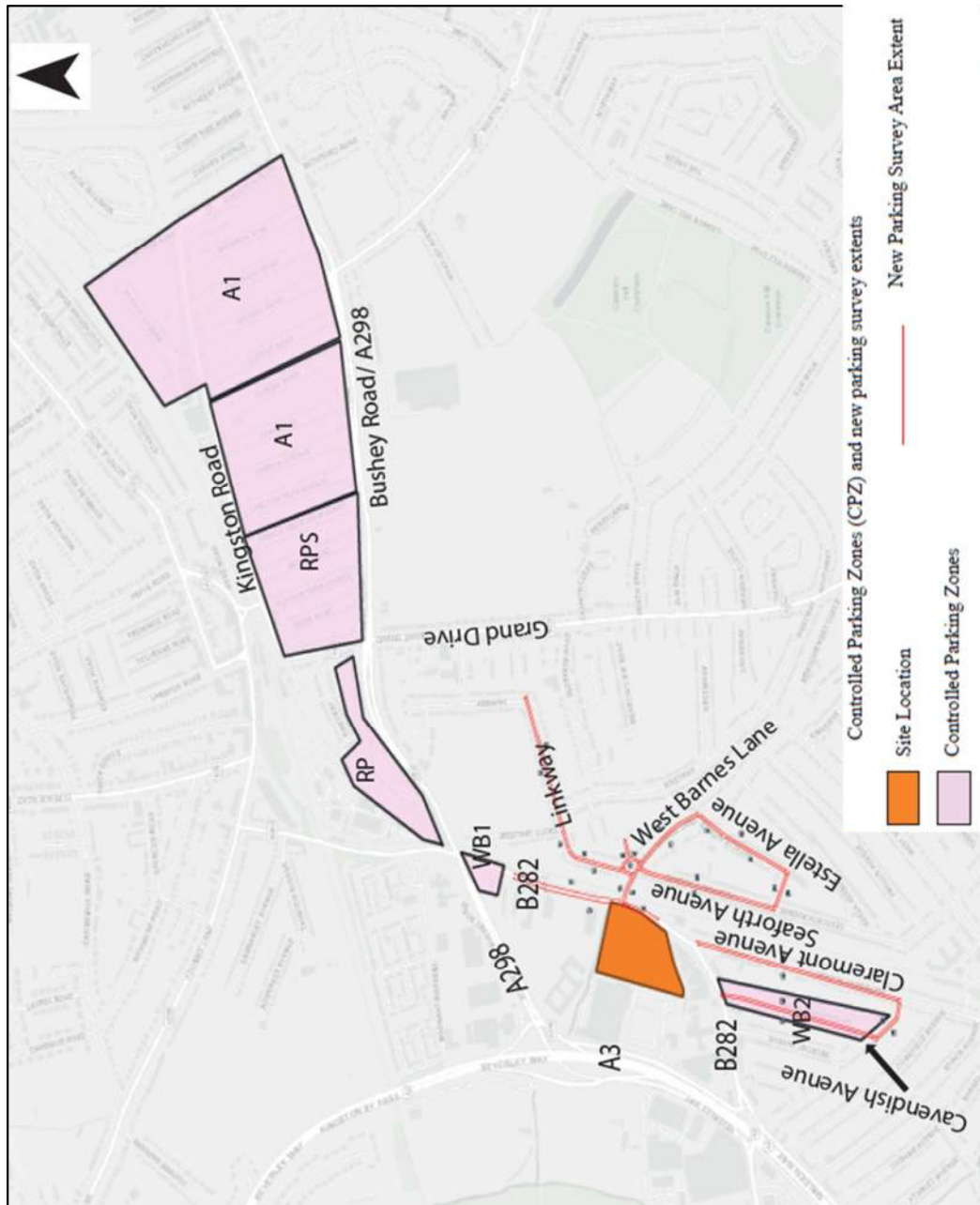
2.7.1 As part of the planning application, a parking survey was conducted on two weekdays between the hours of 00:30 and 05:30 to determine overnight capacity. Parking surveys were undertaken by an independent specialist survey company and included all roads within 200m walk of the site and extending to the end of each road or junction. The survey area was discussed and agreed in advance with LBM. The results of the survey are set out in Table 5.

Table 5: Observed on-street parking demand versus capacity

Road/Link	Capacity	Observed Occupancy Wed 11/10/18		Observed Occupancy Thu 12/10/18	
	Spaces	Spaces	%	Spaces	%
Burlington Rd (B282)	9	1	11.1	3	33.3
West Barnes Lane (B282)	22	14	63.6	14	63.6
Belmont Avenue	4	5	125.0	5	125.0
Cavendish Avenue	74	57	77.0	56	75.7
Claremont Avenue	83	83	100.0	81	97.6
Douglas Avenue	16	12	75.0	12	75.0
Estella Avenue	71	67	94.4	61	85.9
Linkway	53	22	41.5	24	45.3
Seaforth Avenue	95	86	90.5	81	85.3
West Barnes Lane	12	9	75.0	7	58.3
<b>Total</b>	<b>439</b>	<b>356</b>	<b>81.1</b>	<b>344</b>	<b>78.4</b>

2.7.2 The results of the parking surveys indicated that 356 and 344 of the 439 available car parking spaces were occupied on Wednesday and Thursday respectively. Current observed parking demand is therefore between 78.4% and 81.1%, below the 90% threshold which represents the point at which an area is considered to exhibit parking stress so as to warrant intervention. The CPZ zones are shown on Figure 7.

Figure 7: CPZ Zones



2.7.3 As noted in Section 2 Richard Lancaster of PWLC Projects on behalf of LBM has undertaken an updated Car Parking Survey. The survey covers a similar area to the previous survey undertaken by Mott MacDonald. The PWLC survey was undertaken during lockdown conditions as a result of the Covid 19 Global Pandemic with severe restrictions on travel (for business and pleasure) when many people were working from home and avoiding unnecessary travel. As such it is expected that the latest survey would show a higher level of demand when compared to pre Covid conditions.

2.7.4 The results from the surveys in aggregate form are shown in Table 6.

Table 6: Observed on-street parking demand versus capacity

	Day 1			Day 2			Average		
<b>September 2020 survey</b>	CAP	TOT	%OCC	CAP	TOT	%OCC	CAP	TOT	%OCC
B282 Burlington Road	-	-	-	-	-	-	-	-	-
B282 West Barnes Lane	22	10	45%	22	9	41%	22	9.5	43%
Belmont Avenue	3	5	167%	3	6	200%	3	5.5	183%
Cavendish Avenue	77	62	81%	77	50	65%	77	56	73%
Claremont Avenue	73	74	101%	73	69	95%	73	71.5	98%
Douglas Avenue	15	12	80%	15	11	73%	15	11.5	77%
Estella Avenue	68	64	94%	68	65	96%	68	64.5	95%
Linkway	62	57	92%	62	56	90%	62	56.5	91%
Seaforth Avenue	96	80	83%	96	78	81%	96	79	82%
West Barnes Lane	14	13	93%	14	12	86%	14	12.5	89%
<b>Total</b>	<b>430</b>	<b>377</b>	<b>88%</b>	<b>430</b>	<b>356</b>	<b>83%</b>	<b>430</b>	<b>366.5</b>	<b>85%</b>

- 2.7.5 Overall the survey shows an average occupancy of 85% which is broadly in line with the original survey which show 81% average over the two days pre Covid pandemic.
- 2.7.6 The revised survey failed to capture data for Burlington Road which in the original survey was lightly occupied. There were reductions in demand on West Barnes Lane and Cavendish Avenue both of which have controlled parking zones. Linkway showed an increase in demand but the most recent survey extended the length of Linkway included in the assessment as shown in Figure 8.
- 2.7.7 LBM officers had previously concluded that as demand was below 90% that parking controls were not required, and this would still be the case.



Figure 8: PWLC Parking Survey Comparison



## 3 Description of Site

### 3.1 Site Use

- 3.1.1 The northern part of the site comprises commercial buildings with extant permission for B1(a) use and a total floor area of 3,880sqm. These commercial facilities are served by 100 existing on-site car parking spaces. This part of the site is currently unoccupied. An application for prior notification for conversion of the building to C3 residential use (38 dwellings) has been approved.
- 3.1.2 The Southern part of the site comprises part of the existing Tesco Extra car park with some 98 spaces. Minor changes are also required to the layout and configuration of the retained Tesco car park to accommodate the new development, improve facilities for customers and circulation around the site. Tesco have confirmed (see letter in Appendix D) that the spaces lost are surplus to its operational requirement and the remaining 577 spaces west of the site will be retained and are sufficient to serve their customers' needs.

### 3.2 Proposed Site Use

- 3.2.1 The proposed land uses relating to the redevelopment comprises 456 dwellings plus commercial as set out in Table 7. The residential apartments will comprise a mix of privately owned and affordable / rented dwellings shared between one, two and three-bedroom homes.

Table 7: Summary Proposed Development

Land Use	Proposed
Office	499 sqm
Private Residential (flats)	313 units
Affordable Residential (flats)	85 units
Intermediate Tenure (flats)	58 units
Total Residential	456 units

- 3.2.2 It should be noted that the 2019 TA appears to have assessed the proposed office use in terms of service vehicle movements only on the basis that employment trips would be internal to the site (served by

residents). I have considered the full implications of these trips to ensure a robust assessment of the development.

### **Access**

- 3.2.3 The proposed development will retain the existing vehicular site access junction with Burlington Road which will serve the proposed development with the highway to remain in private ownership.
- 3.2.4 Footways will be provided on both sides of the access road which will run all the way through the site. This will retain the pedestrian connection to the Tesco store for residents and the local community, whilst significantly improving the quality of the street and attractiveness of the route.
- 3.2.5 New surface treatments will be carried through the site access road and will provide a more attractive route and environment for pedestrians than is currently available and encourage a slow speed environment.
- 3.2.6 The provision of a right turn lane from Burlington Road into the site was recommended as part of a Stage 1 Road Safety Audit which was accepted by the designer. However, a right turn lane has not been incorporated into the proposed scheme following discussions with LBM officers who confirmed that they would not support such a facility as it would take capacity away from northbound traffic. A second Stage 1 Road Safety Audit has been commissioned by Richard Lancaster of PWCL and I will deal with the issues raised in this audit in Section X.
- 3.2.7 Loading bays capable of accommodating a pantechicon or large refuse vehicle are provided on both the northern and southern side of the access road for refuse collection and service/ delivery vehicles serving the site. Service and delivery vehicles will enter and exit the site via the Burlington Road access and turn using the bell mouth of the proposed southern parking area access junction. However, it should be noted that Redrow has agreed with Tesco that a small number of service vehicles will be permitted to access a plant room in the north-west corner of the site via the Tesco site.
- 3.2.8 Where feasible, companies with regular deliveries will be encouraged to arrange these outside of highway peak hours through a Delivery and Servicing Plan (DSP) (TA Appendix F). Redrow will identify a member

of the site management team to be an initial point of contact concerning delivery and servicing matters prior to occupation.

- 3.2.9 The proposed access road will continue to provide egress for cars exiting the Tesco car park with Tesco service vehicles continuing to access/ egress the Tesco site via Beverley Way.
- 3.2.10 During the two-year site construction period a temporary vehicle and construction access will be provided on land currently occupied by 247 Burlington Road to be considered under a separate Planning Application 19/P2578, which has now been approved. This will also involve the relocation of an existing bus stop on Burlington Road which has been agreed with TfL and the owners of the stop JC Decaux.
- 3.2.11 The cessation of the temporary access on completion of the proposed access road would be secured through S106 obligation volunteered as part of the planning application for the site.

### **Parking**

- 3.2.12 A total of 220 car parking spaces, including 9 which will be allocated for disabled users, will be provided for the development. This level of disabled provision equates to 4% of the total provision and exceeds the latest guidance set out within the new draft London Plan. The car park facilities offered at the site have also been designed, such that further spaces could be made available for disabled users in the future should there be sufficient demand, which again accords with the emerging guidance.
- 3.2.13 The total provision of 220 spaces is equivalent to a parking offer of approximately 50%, which has been agreed in principle with both LBM and TfL. Active and passive electric charging facilities will be provided in accordance with the current London Plan requirements.
- 3.2.14 Five surface car parking spaces are provided including one Car Club space plus the potential for one additional Car Club space should the operator confirm sufficient commercial demand for the service. Surface spaces to be managed by the site management team/ concierge team and

are intended for short duration visits including delivery/ servicing activities.

- 3.2.15 A Car Park Management Plan (CPMP) (Appendix G of the TA) establishes the principles which the site management team will employ. This includes the management and annual review of allocated parking through the use of parking permits which will need to be displayed. Non-residents or other unauthorised individuals will be deterred from parking within the development. Further details of enforcement methods are provided in the CPMP.
- 3.2.16 A Residential Travel Plan was submitted as part of the planning application with the overriding aim to reduce travel to and from the site by car, and furthermore to increase the efficiency of unavoidable car journeys. The Residential Travel Plan identifies a number of measures to encourage walking, cycling and public transport use that will be put forward.
- 3.2.17 The Residential Travel Plan highlights that all households within the development will be offered free membership to the car club, which will be funded by Redrow, for a minimum of one year to encourage new residents to use the car club and that other car club members in the local area would benefit from the use of any car club vehicles provided on site.
- 3.2.18 Minor changes are also required to the layout and configuration of the retained Tesco car park to accommodate the new development, improve facilities for customers and circulation around the site. 577 customer car parking spaces will be retained.
- 3.2.19 Cycle parking set out in the TA was in accordance with the London Plan guidelines, totalling 798 spaces across the development. Following planning submission it was agreed to increase cycle parking to reflect the then Draft London Plan (2017) standards to provide a total of 912 cycle parking spaces. 899 long-stay spaces will be provided in secure stores distributed throughout the site at both ground and first floor levels. In addition, 13 short-stay cycle parking space will be provided,

again in accordance with the Draft London Plan (2017), in communal areas of the site for visitors to use.

- 3.2.20 Eight long stay cycle parking facilities will also be provided within the commercial units, for employees, plus 20 further short stay spaces for customers / visitors.
- 3.2.21 The development therefore provides a total of 940 cycle parking spaces.
- 3.2.22 The level of cycle parking proposed is technically above the standards set out within the Intend to Publish New London Plan (Dec 2019) which would require 855 long stay and 13 short stay for the residential with seven long stay and one short stay for the commercial use, giving a total of 876 spaces. The proposals therefore more than adequately provide cycle parking for the development as set out in Table 8.

Table 8: Cycle parking requirement and provision

Land Use	ItP New London Plan cycle parking requirement	Proposed cycle parking
Residential long-stay	855	899
Residential Short-stay	13	13
Commercial long-stay	7	8
Commercial short-stay	1	20
Total	876	940

## 4 Transport Assessment and Review

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### 4.1 TA Scoping

- 4.1.1 The trip generation methodology applied in the Transport Assessment (TA) dated May 2019 as agreed with LBM at that time, was to treat the original site as B1 office use only and derive vehicular trip rates only using the industry standard TRICS database for this single land use. Whilst this approach would have forecast vehicular trips it fails to accurately account for all journey purposes and accurately forecast aggregate mode share.
- 4.1.2 At the scoping stage only vehicular residential trip rates were presented with other modes subsequently disaggregated using the all person trip rates and census data at the request of LBM.
- 4.1.3 Following discussions with LBM the applicant was requested to consider person trip rates for residential and then to use work based mode share assumptions which I do not consider to be an accurate approach. I have reviewed this methodology further.
- 4.1.4 Officers made a positive recommendation for approval and this included a number of s106 commitments

### 4.2 Policy Review

- 4.2.1 The submitted TA reviewed the:
- National Planning Policy Framework (2019)
  - London Plan (2016)
  - Mayor's Transport Strategy (2018)
  - LB Merton Local Development Framework Core Planning Strategy (2011)
  - LB Merton Sustainable Transport Strategy Local Implementation Plan (LIP2) 2011-2031 (2010)
- 4.2.2 The submitted TA did not review the Draft London Plan. In addition, since submission, the LIP2 been superseded by the LIP3 (2019) and the London Plan is due to be replaced by the Intend to Publish New London Plan (2019, with a likely finalised publish date in 2020). TfL has also

released new guidance for transport assessments using the Healthy Streets framework.

#### LB Merton Transport Strategy: Third Local Implementation Plan (LIP3) (Jun 2019)

4.2.3 The LB Merton Transport Strategy has been designed around a series of objectives, which are:

- *Make Merton a safer place by reducing of collisions on our streets through an evidence led approach that targets implementation of measures where they will have the most effect and support the Mayor's Vision Zero objective.*
- *Reduce the impacts of climate change and improve air quality through a co-ordinated approach, by pulling together air quality, noise impacts, flooding, waste, open space, design and transport to create places that prioritise and enable active travel modes and reduce the dominance of motor vehicles.*
- *Improve connectivity and whole journey experience to the public transport network, especially for people with restricted mobility to support a more inclusive society through a high quality and attractive streets and public spaces free of clutter that support walking, cycling and public transport.*
- *Reducing health inequalities and childhood obesity by opening up access to green spaces and removing barriers to people adopting more active lifestyles.*
- *Support good growth, especially around the town centres at Colliers Wood and South Wimbledon, Morden and Wimbledon, where this supports improved walking, cycling and public transport infrastructure.*
- *Redefine the way our streets are laid out and used so as to encourage the take-up of more active and healthier lifestyles where people feel confident to walk and cycle in safety.*

4.2.4 The strategy is furthermore divided into a series of borough objectives in direct response to identified outcomes from the Mayor's Transport Strategy. Relevant borough objectives to the development from the outcomes include:

- *LO5: Merton Council will work with land owners, developers, Mitcham and Wimbledon Common trustees, National Trust, Park Friends and other internal and external stakeholders to deliver an expanded cycle network across Merton;*
- *LO12A: Aim to make all our main roads safer places for cyclists and where road widths allow aspire to provide dedicated facilities;*



- *LO16: The council will align its spatial policies in accordance with the MTS, Draft London Plan and sister documents. This will support the adoption of stricter parking and cycling standards to reduce car ownership;*
- *LO37: The council will use the planning process to secure complimentary improvements to support better access to public transport facilities;*
- *LO41: To use the planning system to encourage major new development to explore wider health issues associated with the local built environment, transport and air quality;*
- *LO43: To use spatial policy and the planning system to ensure that new development promotes healthy streets principles into their designs in line with T2 of the London Plan;*
- *LO44: To use the planning system to promote permit free and low-car development;*
- *LO45: To use the planning system to ensure new development meets parking and cycling standards as set out in London Plan;*
- *LO47: To secure S106 and CIL improvements and/or contributions to mitigate the impact on transport from development.*

4.2.5 Overall, the LIP3 intends to correlate borough policy with policy derived from the New London Plan and TfL's Healthy Streets guidance.

#### **Intend to Publish New London Plan (Dec 2019 -CD2.2))**

4.2.6 The New Draft London Plan was published in August 2018, prior to the submission of the TA. Subsequent to that the Intend to Publish New London Plan (CD2.2) was published in December 2019

4.2.7 Policy T1 states that development proposals should facilitate *the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041.*

4.2.8 Policy T2 states that development proposals *should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling* and that development proposals should:

- 1) *demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance*
- 2) *reduce the dominance of vehicles on London's streets whether stationary or moving*
- 3) *be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.*

4.2.9 Policy T4 states that development proposals should *reflect and be integrated with current and planned transport access, capacity and connectivity, and that transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development.* The policy continues:

*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.*

*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 the necessary public transport and active travel infrastructure.*

4.2.10 Policy T5 states that development proposals should *help remove barriers to cycling and create a healthy environment in which people choose to cycle through securing the provision of appropriate levels of cycling parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards.* The policy then sets out cycling minimums for developments.

4.2.11 Policy T6 states that *car parking should be restricted in line with levels of existing and future transport accessibility and connectivity;* it also states that *where car parking is provided in new developments, provision should be made for electric or other Ultra-Low Emission vehicles.* The policy also states that *where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.* The Intend to Publish London Plan draft added: *some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.* The policy then sets out parking maximum standards for developments by use class.

4.2.12 Policy T6 part C specifically states *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. Part D sets out maximum parking standards in Policy T6.1 which should be applied and used to set local standards.*

- 4.2.13 Policy T9 states that *planning obligations (Section 106 agreements), including financial contributions, will be sought to mitigate impacts from development, which may be cumulative. Such obligations and contributions may include the provision of new and improved public transport services, capacity and infrastructure, the expansion of the London-wide cycle networks and supporting infrastructure, and making streets pleasant environments for walking and socialising, in line with the Healthy Streets Approach.*

### **TfL Healthy Streets Guidance**

- 4.2.14 TfL has released guidance for Transport Assessments within London that follow Vision Zero and the Healthy Streets Approach. According to Healthy Streets Explained, the Healthy Streets Approach is *a system of policies and strategies to put people, and their health, at the heart of decision making*, using ten primary indicators:

- Pedestrians from all walks of life;
- Easy to cross;
- Shade and shelter;
- Places to stop and rest;
- Not too noisy;
- People choose to walk, cycle and use public transport;
- People feel safe;
- Things to see and do;
- People feel relaxed; and
- Clean air.

- 4.2.15 The Healthy Streets Approach helps development proposals meet the transport policy requirements of the London Plan, and asks developers to explicitly state how development proposals support Healthy Streets, Vision Zero, and the Mayor's Transport Strategy. It also explicitly states that the development should explain how *strategic transport policies will be delivered, not just what they are and the integration*

*between transport and the proposed development's key characteristics, principles and design.*

- 4.2.16 I recognise that the development proposal for this site needs to address how the development interacts with Healthy Streets principles, particularly as they are explicitly referenced in the local (LB Merton LIP3) and London-wide (New London Plan) policy documents. The current Transport Assessment does not mention Healthy Streets in the main body text. I have therefore assessed this in my analysis later in this evidence.

### **NPPF**

- 4.2.17 The National Planning Policy Framework (NPPF) (2018) states in paragraph 108

*108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

- 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; and*
- c) 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.*

- 4.2.18 Paragraph 109 goes onto say: *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.*

## Cited Policies for Rejection

4.2.19 A number of policies were cited in the rejection of the application. These policies are detailed below:

### London Plan Policies

- Policy 6.3 Assessing Effects of Development on Transport Capacity

*Development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.*

- Policy 6.10 Walking

*Development proposals should ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space by referring to Transport for London's Pedestrian Design Guidance.*

### LB Merton Core Strategy

4.2.20 Policy CS18 Active Transport states

*We will promote active transport by:*

- Prioritising for the access and safety of pedestrian, cycle and other active transport modes;*
- Supporting schemes and infrastructure that will reduce conflict between pedestrians, cyclists and other transport modes;*
- Encouraging infrastructure appropriate for all abilities and ages, catering for both commuter and recreational users and designed in accordance with Secure by Design;*
- Working to ensure the pedestrian environment in the borough is safe, enjoyable and attractive;*
- Partnership working to deliver high quality links or the enhancement of existing pedestrian and cycle networks, including the Capital Ring, Wandle Trail, Wandle Beverly Brook Link, the Greenways Network, the Cycle Super Highway, and the London Cycle Network;*
- Requiring the submission of Travel Plans to accompany development proposals which meet or exceed the Department for Transport's indicative thresholds for Transport Assessment or the thresholds in relevant Transport for London guidance;*
- Encouraging design that provides, attractive, safe, covered cycle storage, cycle parking and other facilities (such as showers, bike cages and lockers).*

#### 4.2.21 Policy CS20 Parking, Service and Delivery

*We will seek to implement effective traffic management by:*

- a) *Working with Transport for London and other partners to progress a range of transport improvements in key town centres, in particular, to enhance the environment and bring about significant improvements for all road users;*
- b) *Prioritising for people with restricted mobility and protecting vulnerable road users;*
- c) *Supporting development that includes car club bays and electric vehicle charging points;*
- d) *Requiring developers to demonstrate that their development will not adversely affect pedestrian and cycle movements, safety, the convenience of local residents or the quality of bus movement and/or facilities; on-street parking and traffic management;*
- e) *Providing car parking in accordance with the council's current parking standards;*
- f) *Considering new or expanding existing Controlled Parking Zones (CPZ) where it is deemed to reduce trip generation, promote road safety and protect existing residential amenity;*
- g) *Supporting permit-free developments in areas within CPZ's benefiting from good access to public transport (PTAL 4 - 6), with good access to facilities and services and/or in a town centre location. Permit free agreements may apply to proposals with or without off-street parking;*
- h) *Incorporating Merton's road hierarchy and Merton's Vehicle Crossover Information Pack when locating and designing access arrangements to developments;*
- i) *Requiring developers to incorporate adequate facilities for servicing to ensure loading and unloading activities do not have an adverse impact on the public highway or create areas which are unsafe at night or hours of low usage in accordance with standards set by the Freight Transport Association;*
- j) *Requiring developments to incorporate safe access to and from the public highway as well as on-site parking and manoeuvring for emergency vehicles, refuse storage and collection, and for service and delivery vehicles;*
- k) *Implementing measures to discourage/reduce pavement parking in industrial areas of the borough, particularly at Willow Lane, South Wimbledon/Morden Road and Weir 184 Road / Durnsford Road;*
- l) *Including measures for visitor drop-off and pick-up areas, taxis, bus/coach parking, off street parking, set-down and pick-up facilities and Community Transport (e.g. Dial-a-ride) in development where appropriate;*

- m) *Seeking planning obligations to mitigate the impact of development proposals and provide improvements to the highway network/public realm;*
- n) *Promoting measures to reduce the impact of goods vehicles on residential areas and town centres.*

4.2.22 Paragraph 26.22 of LBM adopted Core Strategy explains that Parking Controls, CPZ's and standards are essential to manage traffic generation by restraining car movements within the context of improving road safety and access, and point echoed in paragraph 26.25.

### **LB Merton Sites and Policies**

4.2.23 DM T2 Transport Impacts of Development states: *a) Planning permission will be granted for development proposals provided they do not adversely impact on the road or public transport networks, safety or congestion particularly on strategically important routes.*

## **4.3 Section 106 Contributions**

4.3.1 The recommendation to the Planning Applications Committee 13 February 2019 (Agenda Item 7) was to grant planning permission subject to s106 agreement and s278 agreement as below.

S106 legal agreement:

- £150K to improve pedestrian and cycle infrastructure in the surrounding area,
- £100K towards pedestrian crossing facility and junction improvement at Burlington Road/Claremont Avenue junction,
- Travel Plan with £2K monitoring contribution,
- The developer agreement to provide a 3 year membership to a car club for each residential unit of the development at the cost of the developer;
- £450K contribution towards an additional bus journey in each peak period,
- carbon offset contribution of £651,060,
- £24,600 contribution towards off-site children's play facilities
- £22K for Air Quality Service Impact,
- £9K contribution to the Council's Air Quality Action Plan
- The developer agreeing to meet the Council's costs of preparing (including legal fees) the Section 106 Obligations.

S278 agreement:

- The upgrading of bus stops Stop B (9154) – Cavendish Road, Stop C (9155) – Burlington Road / Shannon and Bus Stop E (27392) – West Barnes Level.

4.3.2 The committee report highlights that at consultation there was a suggestion that a CPZ is introduced (but not at existing residents' expense) (para. 5.1), and that the Council's Transport Planner advised that the introduction of a new Controlled Parking Zone (CPZ) is not warranted in neighbouring residential roads due to the availability of parking in the surrounding area (para 7.10.23).

4.3.3 The Supplementary Agenda (Modifications Sheet) Item 7 provides additional comments in relation to the introductions of a CPZ as below. The document refers to *Planning Agent additional comments (in relation to funding a consultation for the introduction of a CPZ in the vicinity)*:

*Redrow are aware of the concerns expressed by some residents in relation to the impact of overspill parking from the development at 265 Burlington Road.*

*As you know, the parking stress survey has shown that parking in the area is operating below 'stress' capacity and therefore this does not trigger the need for parking controls.*

***Notwithstanding this, my client is prepared to offer a financial contribution within the s106 agreement to fund the cost of a CPZ consultation if this is considered necessary by Members (up to a maximum of £40,000). We would be grateful if this is put forward at tomorrow's committee meeting.***

*The s106 would also include an obligation that in the event a CPZ is introduced, residents of the development would not be eligible to apply for parking permits. (emphasis added)*

4.3.4 The 'Officer comment' stated that *Whilst the parking stress survey showed there to be spare parking capacity in surrounding roads, officers recognise that parking availability is a concern of existing residents and given the number of proposed residential units this offer*



*from the applicant would go some way to relieve that concern and is welcomed.*

- 4.3.5 The proposal to fund CPZ still stands and therefore the assessment of the scheme must be considered in light of this commitment, together with the other committed s106 and s278 obligations.

## 5 Original Trips and Mode share

- 5.1.1 As the majority of the original land uses have been vacated, it is appropriate to calculate the trip generation of the previous operational site using the industry standard trip generation database (TRICS), rather than surveying existing travel characteristics. This analysis enables the likely number of trips from the original land use<sup>3</sup> to be forecast, based on a fully occupied site.
- 5.1.2 At the TA scoping stage it was agreed with LBM officers that the whole site (3,880sqm GFA) would be treated as Office use utilising trip rates derived from TRICS. Vehicular trip rates and trip generation (all vehicles only) were presented in the 2019 TA, however a full breakdown of the all vehicle trips are presented in Table 9.

Table 9: Office Trips Generation (2019 TA)

Mode	AM Peak (0800-0900)			PM Peak (1700-1800)			Daily (0700-1900)		
	In	Out	Total	In	Out	Total	In	Out	Total
Car/ LGV	23	3	26	5	22	28	136	125	261
Taxis	0	1	1	1	1	2	4	4	7
OGVs	0	0	0	0	0	0	1	1	3
PSVs	0	0	0	0	0	0	1	1	3
Cyclists	4	0	4	0	5	5	10	10	20
<b>All Motor Vehicles</b>	<b>23</b>	<b>4</b>	<b>27</b>	<b>7</b>	<b>23</b>	<b>30</b>	<b>142</b>	<b>132</b>	<b>274</b>

NB. Figures are subject to rounding

- 5.1.3 It should be noted that the vehicular trip rates applied in the 2019 TA include Taxis, Other Goods Vehicles (OGVs), Public Service Vehicles (PSVs) and Cyclists; therefore, the car demand is lower than the total vehicles generated.
- 5.1.4 Notwithstanding the agreed position with LBM, an alternative multi-modal trip generation assessment has been undertaken to further consider trips generated by other modes. Further details of the

<sup>3</sup> Mr Murch explains that whilst the B1(a) use has ceased that nonetheless it represents a lawful fall back for which there is a realistic prospect of the use resuming in the event that a beneficial redevelopment of the site could not be secured and therefore this represents an appropriate baseline for consideration. Should the above referenced prior notification be consented then this too will be assessed as an alternative baseline in due course.

alternative assessment methodology are set out in Appendix A with the resultant alternative trip generation by mode set out in Table 10.

5.1.5 The alternative assessment in my view represents a more accurate assessment of the car based travel demand and the relationship between the availability of car parking and the likely level of car travel. This assessment also uses a car mode share proportion that is well below the observed percentage car mode share for employment surveyed in the 2011 Census.

Table 10: Office Alternative Multi-modal Trip Generation (Wembley TRICS Site Only)

Mode	AM Peak (0800-0900)			PM Peak (1700-1800)			Daily (0700-1900)		
	In	Out	Total	In	Out	Total	In	Out	Total
Car Driver	27	2	29	4	29	33	205	186	391
Taxi	0	0	0	0	0	0	1	1	2
Car /Taxi Passenger	5	0	5	1	5	5	34	30	64
Bus	25	2	26	4	26	30	184	167	351
Underground	8	1	9	1	9	10	61	55	117
Train	18	1	20	3	19	22	137	124	261
Walk	19	1	20	3	20	22	140	127	267
Bicycle	0	0	0	0	0	0	1	1	2
Motorcycle	1	0	2	0	1	2	10	10	20
<b>Total</b>	<b>104</b>	<b>7</b>	<b>111</b>	<b>16</b>	<b>109</b>	<b>124</b>	<b>773</b>	<b>701</b>	<b>1474</b>

NB. Figures are subject to rounding

5.1.6 The trip generation set out in Table 10 shows that the alternative multi-modal trip generation results in a slightly higher number of car driver and taxi trips than the all vehicle trip generation for the original uses applied in the 2019 TA for the AM peak, PM peak and Daily two-way vehicle movements.

5.1.7 Therefore, whilst flows are of a similar order, this alternative multi-modal trip generation would therefore result in a more accurate and marginally higher baseline against which to assess proposed land uses. This essentially corroborates the earlier work, but I have used the more accurate figure for my assessment.

## 6 Proposed Trips and Mode Share

- 6.1.1 The 2019 Transport Assessment explains in paragraph 6.2.2 that the approach to estimating the trip generation associated with the proposed development presented in the TA Scoping Report was based around the application of vehicular trip rates, derived from TRICS, to the proposed accommodation schedule. Once the vehicular trips had been established, a mode share derived from Census (2011) data would then be applied to estimate the proportionate trips expected to be made by other modes.
- 6.1.2 On that basis, paragraph 6.2.3 explains that the proposed trip rates to be applied to privately owned and affordable / rented dwellings were presented in the scoping report. The application of these rates to the final accommodation schedule would result in 55 (AM) and 52 (PM) vehicular trips being expected to be generated by the proposed dwellings. The TA continues to explain that whilst these trip levels were considered to be acceptable to LBM and TfL, it was requested that total person trip rates be derived from TRICS and Census journey to work mode share data be applied to this instead. This approach was therefore followed for the Transport Assessment and the resulting trips are set out in Table 11.

Table 11: Total Proposed Trip Generation (Residential and Office Uses) (2019 TA)

Mode	AM Peak (0800-0900)			PM Peak (1700-1800)		
	In	Out	Total	In	Out	Total
Motor Vehicles	15	68	83	43	26	69
Bus	3	17	20	11	6	17
Underground	19	112	131	70	38	108
Train						
Walk	3	15	18	10	5	15
Bicycle	2	9	11	5	3	8
<b>Total</b>	<b>42</b>	<b>221</b>	<b>263</b>	<b>139</b>	<b>78</b>	<b>217</b>

NB. Figures are subject to rounding

- 6.1.3 Paragraph 6.2.12 of the TA states that when the commercial trips are combined with the proposed residential trips, the development is therefore predicted to generate 83 (AM) and 69 (PM) vehicular trips. This alternative approach therefore increases the amount of vehicle trips in the morning from 55 two way trips to 83 trips. In my judgement this

is a significant over-estimate and results from erroneously applying journey to work data to all peak hour trips.

- 6.1.4 Journey to work mode share data is not considered to represent actual residential mode shares as this does not take account of other journey purposes such as education, retail and leisure, which form a significant proportion of peak hour trips, as well as the differential constraints and opportunities at different times of the day. Also, as only a single Census data set was used to forecast mode share, differences between private and affordable mode shares were not considered in the 2019 TA.
- 6.1.5 Appendix B sets out my alternative approach to more accurately forecast the proposed development trips. The mode shares for private and affordable units follows more closely the methodology proposed in the TA Scoping report. The mode shares for car driver, taxi, walking and cycling have been derived using the multi-modal trip rates for these modes as a percentage of the all person trip rate (2-way daily). Only the remaining public transport modes have been proportioned in line with 2011 census journey to work origin-destination data for the mid-layer super output area which covers the site (E02000704 as a place of residence). The use of journey to work data (in the absence of the public transport proportions within TRICS) is considered appropriate to reflect the proportion of trips by different local public transport modes, whilst the total public transport mode share reflects all journey purposes.
- 6.1.6 Alternative Trip Generation by Mode in Appendix B is summarised in Table 12.

Table 12: Alternative Proposed Trip Generation by Mode (Excluding Servicing)

Mode	AM Peak (0800-0900)			PM Peak (1700-1800)			Daily (0700-2100)		
	In	Out	Total	In	Out	Total	In	Out	Total
Car Driver	7	39	46	25	13	38	210	216	426
Taxi	1	3	4	2	2	4	22	21	43
Car / Taxi Passenger	5	30	35	19	10	29	160	164	324
Bus	5	8	13	6	7	12	71	69	140
Underground	4	13	17	8	6	15	83	83	166
Train	10	37	47	24	16	40	221	225	446
Walk	18	84	102	51	31	83	465	472	936
Bicycle	1	4	5	2	2	4	25	25	50
Motorcycle	0	2	2	1	1	2	11	11	22
<b>Total</b>	<b>52</b>	<b>220</b>	<b>273</b>	<b>139</b>	<b>88</b>	<b>227</b>	<b>1267</b>	<b>1287</b>	<b>2554</b>

NB. Figures are subject to rounding

Table 13: Alternative Proposed Trip Generation Total (Servicing Trips Only)

Mode	AM Peak (0800-0900)			PM Peak (1700-1800)			Daily (0700-2100)		
	In	Out	Total	In	Out	Total	In	Out	Total
LGV	3	2	5	4	3	7	65	62	126
OGV	0	0	0	0	0	1	8	9	17

6.1.7 This more accurate forecast of residential trips shows that peak hour two way car trips would amount to some 46 car trips in the AM and 38 in the PM, and when combined with servicing trips this amounts to 51 trips AM and 45 trips PM. This is a more accurate approach and demonstrates that the TA significantly over estimated vehicular peak hour generation.

6.1.8 It should also be noted that the proportion of trips by car and taxi as a proportion of total daily trips is in line with the Mayors Transport Strategy for 80% of travel demand to be foot, cycle or public transport. This is positive given that the 80% target is an average for the whole of London with greater modal shift expected in Central and Inner London with Outer London expected to have a lower average.

## 6.2 Net Change in Trips

6.2.1 In this section I will compare the net change in travel demand between the original travel demand from the existing lawful B1(a) office use of the Site and the proposed development. I have presented the figures using the original Transport Assessment approach and the revised analysis I have derived within this evidence.

6.2.2 Table 14 sets out the net changes in predicted vehicular travel generation in the Transport Assessment.

Table 14: Net Change in Original (Table 9) and Proposed (Table 11) uses set out in the TA (Including Servicing Trips)

Mode	AM Peak (0800-0900)			PM Peak (1700-1800)		
	In	Out	Total	In	Out	Total
Original Office Trips (motor vehicles)	23	4	27	7	23	30
Proposed Residential Trips (motor Vehicles)	12	67	79	42	23	65
Proposed Office Trips (motor Vehicles)	3	1	4	1	3	4
Total Proposed Trips (motor vehicles)	15	68	83	43	26	69
<b>TA Net Change (Total Proposed – Original Trips)</b>	<b>-8</b>	<b>64</b>	<b>56</b>	<b>36</b>	<b>3</b>	<b>39</b>

NB. Figures are subject to rounding

6.2.3 The above table shows that the net increase in hourly trips included in the Transport Assessment amounts to 56 two way trips in the AM and 39 in the PM. This amounts to less than one vehicle a minute in the AM and one vehicle every 1.5 minutes in the PM. I will discuss in section 8 whether this level of change would be discernible against existing traffic flows on the local road network.

6.2.4 I have then gone on to review the travel demand and found that the Transport Assessment under estimated the likely level of vehicular demand for the original uses and that the LBM request to use work based journey to daily work mode shares grossly overestimated the proposed travel demand arising from the appeal proposals. Therefore

the TA overestimated the traffic implications of the development albeit LBM officers considered that change in demand acceptable.

6.2.5 The net change in travel demand using my updated original and proposed uses is set out in Table 15.

Table 15: Net Change in Alternative Original (Table 10) and Alternative Proposed land uses (Table 12) (Excluding Servicing Trips)

Mode	AM Peak (0800-0900)			PM Peak (1700-1800)			Daily (0700-2100)		
	In	Out	Total	In	Out	Total	In	Out	Total
Car Driver	-21	37	16	21	-15	6	5	30	36
Taxi	1	3	4	2	2	4	21	21	41
Car Passenger	1	30	30	18	5	24	126	134	260
Bus	-19	6	-13	2	-19	-17	-113	-97	-210
Underground	-4	12	8	7	-2	5	21	28	49
Train	-9	36	27	21	-3	18	85	101	186
Walk	-1	83	82	48	12	60	325	345	669
Bicycle	1	4	5	2	2	4	24	24	48
Motorcycle	-1	2	1	1	-1	0	1	2	2
<b>Total</b>	<b>-51</b>	<b>213</b>	<b>162</b>	<b>123</b>	<b>-20</b>	<b>103</b>	<b>495</b>	<b>586</b>	<b>1081</b>

NB. Figures are subject to rounding

6.2.6 This revised forecast results in a 21 vehicle increase in the AM peak hour and a 10 vehicle increase in the PM peak (includes cars, taxis and motorcycles). This amounts to an additional vehicle every 3 minutes in the AM and every 6 minutes in the PM. Interestingly it also forecasts that the amount of bus passengers would fall with the proposed development. However, if some rail/underground passengers use bus to access the relevant stations then overall some small increase in passenger numbers would arise.

6.2.7 The above table does not include servicing trips, and to allow a comparison between the different uses on the highway network I have included these flows in the table below, adding all vehicles together.



Table 16: Net Change in Vehicular Trips (Car, Taxi and motorcycle, LGV, OGV, PSV) Alternative Original Uses (Table 7) and Alternative Proposed land uses (Tables 9 and 10) (Includes Servicing Trips)

Mode	AM Peak (0800-0900)			PM Peak (1700-1800)			Daily (0700-2100)		
	In	Out	Total	In	Out	Total	In	Out	Total
Alternative Original (Including servicing)	31	2	33	5	32	37	232	211	443
Alternative Proposed (Including Servicing)	11	46	58	33	19	52	315	318	633
<b>Total Net Change</b>	<b>-20</b>	<b>44</b>	<b>24</b>	<b>28</b>	<b>-13</b>	<b>15</b>	<b>83</b>	<b>108</b>	<b>191</b>

NB. Figures are subject to rounding

6.2.8 Table 16 shows that overall there would be an additional 24 vehicles per hour, equivalent to a vehicle every 2 minutes in the morning peak hour and an additional 15 vehicles equivalent to an additional vehicle every 4 minutes in the evening peak hour.

6.2.9 Table 16 shows that the net change in vehicle trips between the alternative proposed and alternative original land uses are significantly below the 56 AM and 39 PM net change in vehicle trips forecast in the 2019 TA (Table 12 above). The revised forecast is half that considered in the Transport Assessment for the AM forecast and one quarter of the PM forecast.

6.2.10 The original assessment therefore in my view substantially overstated the likely net vehicular trip generation arising from the proposed development, which in reality is very much lower. Even with this higher impact the LBM officers considered that change in demand acceptable.

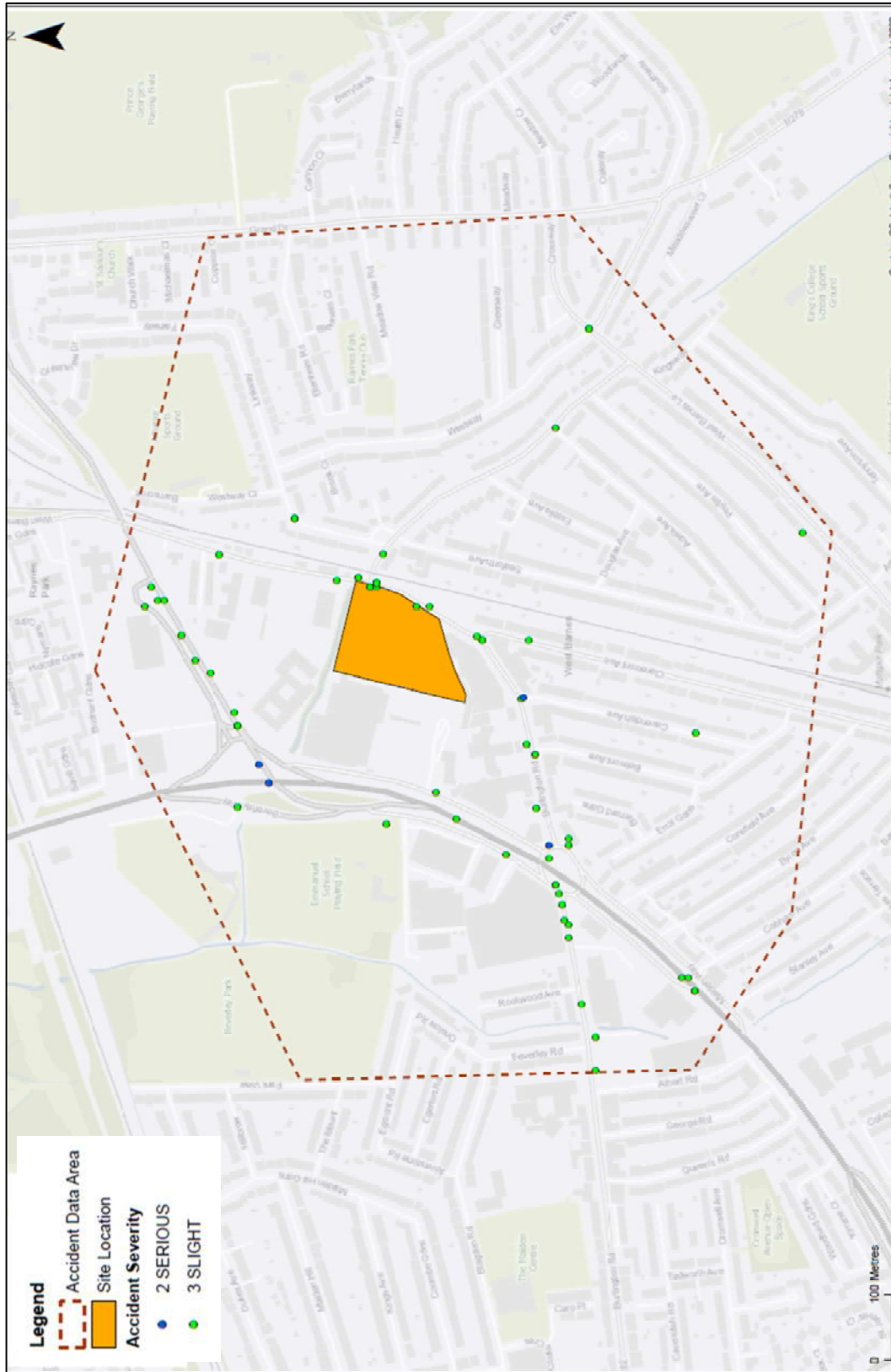
## 6.3 Operational Analysis

6.3.1 I have considered the analysis set out within the Transport Assessment report 2019 for the existing (section 5 of the TA) Do Minimum and Do Something scenarios (Section 7 of the TA).

6.3.2 Section 5.2 of the Transport Assessment undertook a Road Safety Review and concludes in paragraph 5.2.7 that there appears to be no clear pattern of accidents in the vicinity of the proposed development

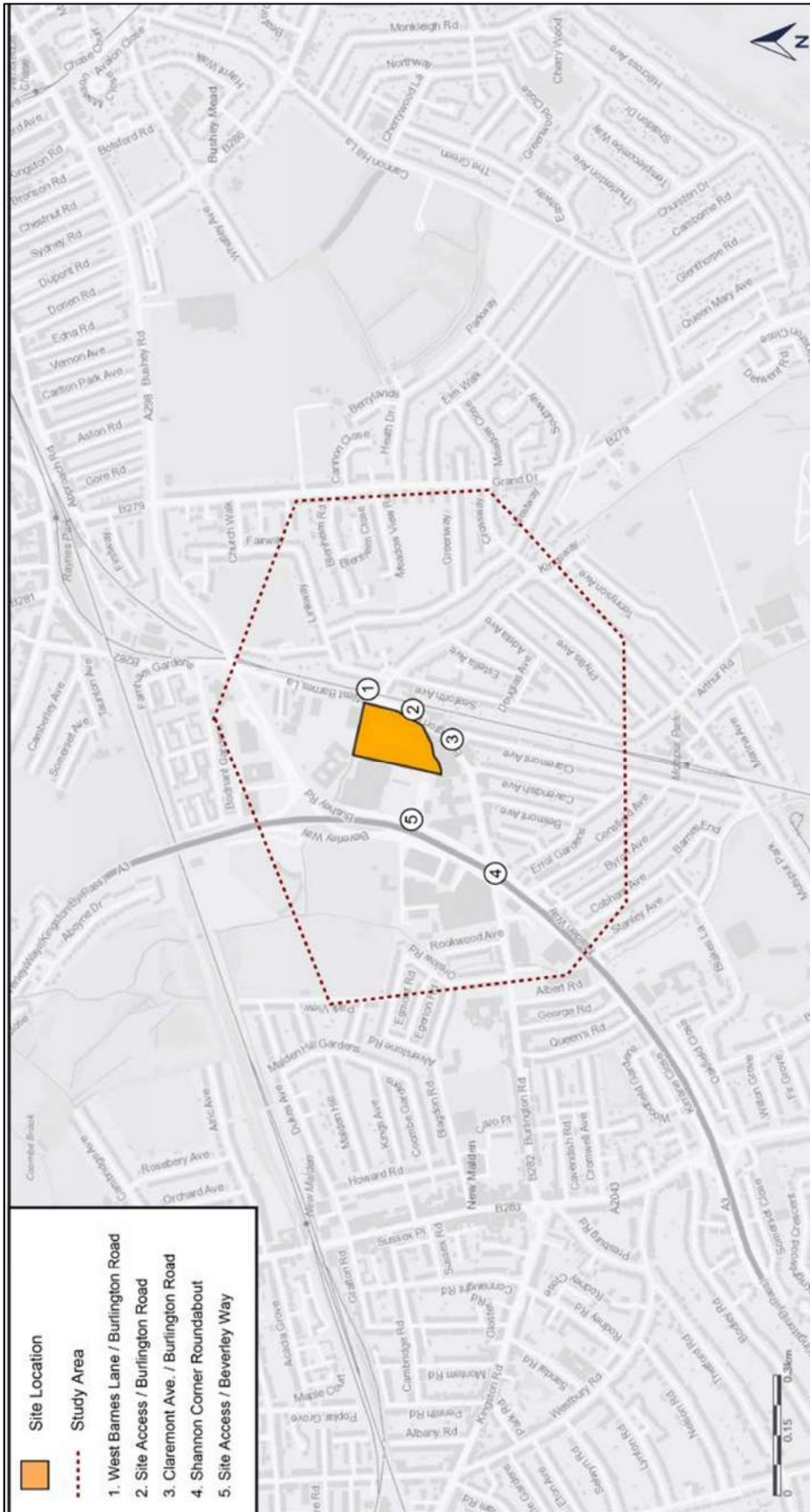
and no accidents that can be directly attributed to highway design or layout. I have reviewed more recent data for the area as a whole and have concluded that there is no material change in the conclusions made within the Transport Assessment. Personal injury accident locations for the latest three years (2017-2019) are provided in Figure 9.

Figure 9: Personal injury accident locations for the latest three years (2017-2019)



6.3.3 Tables 7.1 and 7.2 of the TA demonstrate that the site access junction would operate well within capacity with little discernible change between the two scenarios. The location of junction capacity assessments as identified in the TA (TA Figure 5.1) are provided in Figure 10.

Figure 10: TA Junction Capacity Assessment Study Area



- 6.3.4 Tables 7.3 and 7.4 of the TA identify that the mini roundabout junction of Burlington Road and Claremont Road already operates close to capacity in both peak hours and that the TA forecast traffic flows would worsen this operation to some degree.
- 6.3.5 These junction capacity results were discussed with LBM as explained in paragraph 7.3.4 of the Transport Assessment and officers stated that no capacity improvements would be required. Instead officers requested improvements to pedestrian facilities and the urban environment, no doubt in line with the Mayors Transport Strategy to focus on active modes of travel and pursue a policy of encouraging Healthy Streets.
- 6.3.6 A scheme of improvements was developed with Exterior Architecture which is described further in paragraph 7.3.5 and in Appendix L of the Transport Assessment. These measures will facilitate better pedestrian facilities and encourage residents to utilise walking and sustainable modes rather than the car.
- 6.3.7 Tables 7.5 and 7.6 of the TA summarise the performance of the Burlington Road and West Barnes Lane junction performance and concludes that the impact of the proposals at this location is expected to be negligible (paragraph 7.2.10).
- 6.3.8 The Transport Assessment also reviews the performance of the Shannon Corner junction in Tables 7.7 and 7.8 and concludes that queuing is consistent between the 2021 Do Minimum and Do Something scenarios with changes of less than one pcu (passenger car unit) in all cases. As such it can be concluded that there is no material change in the performance at this junction. Paragraph 7.10.42 of the Committee Report [CD7.1 *Planning Officers Report to Committee*] confirms that TfL has reviewed the modelling and confirmed that the modelling is acceptable and does not indicate the need for mitigation measures on the TfL Network.
- 6.3.9 In relation to the changes in traffic flows forecast within the submitted Transport Assessment 2019 officers stated (paragraph 7.10.15 that the trip generation is robust) and I would agree, in the sense that it overestimated the impact of the development. Nevertheless, even with

these amplified forecasts officers raised no objections to the proposed development on traffic grounds.

- 6.3.10 I have demonstrated in my review of the original and proposed development flows that the difference between the Do Minimum and Do Something scenarios is much smaller than assumed within the Transport Assessment. The difference in traffic flows is half what the TA assumed in the AM peak and a quarter of what the TA assumed in the PM peak.
- 6.3.11 The actual level of change in junction performance between Do Minimum and Do Something would therefore be substantially less than that found acceptable by LBM officers and TfL.

## 7 Response to Reasons for Refusal and Third Party Objections

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- 7.1.1 I have set out the reasons for refusal in section 2 above. I have considered each aspect of the reasons for refusal below, set against Planning Policy.
- 7.1.2 The first part of the first reason for refusal refers to the number of units (scale of development), the location of the access and prevailing highway and parking conditions.
- 7.1.3 From a transport perspective the number of units would result in a level of travel demand which has been assessed within the Transport Assessment and has been reassessed in this evidence, providing what I consider to be a more accurate assessment. The Transport Assessment concluded that the development proposals were acceptable, officers of LBM agreed as did TfL in respect of their network. I have reassessed the level of travel demand and found that the likely net change is substantially less than that found acceptable to LBM and TfL.
- 7.1.4 Highway officers of LBM and TfL rightly considered that the proposals were acceptable, even though they assessed the implications of the scheme based on materially higher levels of demand and likely net change.
- 7.1.5 The location of the access is the same as the existing condition, and there is no evidence that this position has resulted in any adverse capacity of road safety issues. There is an extant use on the site and this access can continue to be utilised, and as such the net change is only related to the changes in traffic flows, which have been assessed.
- 7.1.6 The reason for refusal then focusses on two key areas, one bullet point related to traffic environment and the other bullet relating to parking. I will consider each of these aspects in turn in more detail below.

### 7.2 Part 1: Traffic and Congestion

- 7.2.1 London Borough of Merton officers assessed the technical details of the Transport Assessment and concluded that the level of traffic flow assessed within the TA was acceptable. I have reviewed that assessment and concluded that in my judgement the net change in traffic



flows resulting from the development would be likely to be significantly lower.

- 7.2.2 I set out in paragraph 7.2.8 above my forecast that the net change in traffic flows resulting from the development would add a vehicle every 2 minutes in the morning and every 4 minutes in the evening peak hours (24 and 15 vehicles per hour in the AM and PM respectively).
- 7.2.3 The Observed traffic flows onto which this net change would be added, are set out in Figures 5.2 and 5.3 of the Transport Assessment show that on Burlington Road north of Claremont Avenue the two way traffic flows would be 1237 vehicles in the AM and 1423 in the PM. The TA shows that the worst case Do Minimum traffic conditions occur in the PM peak (locally PM about 15% higher than AM) and the net change in traffic flows due to the development are lower in the PM peak when compared to AM.
- 7.2.4 Table 6.5 of the Transport Assessment identifies that only 17.4% of development trips would travel north from the site access and the remainder travelling south.
- 7.2.5 In order to consider the net change in flows I have utilized the revised original development flows, and my revised development flows with the TA distribution assumptions in both cases and summarized these in Table 17 and Table 18. I have also compared these to the figures produced in the TA.
- 7.2.6 The table refers to the external routes into the local network, and I have also included the net change in flows on the network immediately south of the site access where the implications would be greatest.

Table 17: AM peak traffic flow Do Minimum (DM) and Do Something (DS) summary

Road Name	TA				Alternative Trip Generation			
	DM	DS	Net Change	%	DM	DS	Net Change	%
West Barnes Lane (North)	910	915	4	0.5%	911	911	0	0.0%
West Barnes Lane (East)	623	619	-5	-0.7%	625	618	-7	-1.1%
Claremont Avenue	307	305	-2	-0.6%	308	305	-3	-0.8%
A3 Malden Way (South)	1238	1271	33	2.6%	1240	1259	19	1.6%
Burlington Road (West)	1353	1357	4	0.3%	1354	1354	0	0.0%
A3 Beverley Way (North)	1136	1158	22	1.9%	1137	1151	14	1.2%
Total	5568	5624	56	1.0%	5574	5598	24	0.4%
Burlington Road South of the Site	1291	1348	56	4.4%	1295	1326	31	2.4%

NB. Figures are subject to rounding

Table 18: PM peak traffic flow Do Minimum (DM) and Do Something (DS) summary

Road Name	TA				Alternative Trip Generation			
	DM	DS	Net Change	%	DM	DS	Net Change	%
West Barnes Lane (North)	995	991	-4	-0.4%	999	988	-10	-1.0%
West Barnes Lane (East)	905	898	-7	-0.8%	908	898	-10	-1.1%
Claremont Avenue	254	253	-1	-0.3%	254	253	-1	-0.3%
A3 Malden Way (South)	1742	1771	29	1.7%	1742	1763	21	1.2%
Burlington Road (West)	1452	1457	4	0.3%	1453	1455	3	0.2%
A3 Beverley Way (North)	1310	1328	18	1.4%	1310	1323	13	1.0%
Total	6658	6697	39	0.6%	6665	6680	15	0.2%
Burlington Road South of the Site	1476	1526	50	3.4%	1477	1512	35	2.4%

NB. Figures are subject to rounding

- 7.2.7 The revised, more realistic travel demand forecasts show that the proposed development would have very little aggregate effect on the wider network and in some cases a net reduction in traffic. Looking at the highest change immediately south of the site access the Alternative Trip generation I have utilized shows that the percentage change in both peaks is 2.4% (31 and 35 vehicles in the AM and PM respectively).
- 7.2.8 Focusing on the highest evening peak flows the Do minimum traffic flows south of the access equate to a vehicle every 2.44 seconds and would increase in frequency to every 2.38 seconds. (These are so close that the time would be 2.4 seconds in both cases to one decimal place) Trying to observe the difference in vehicles per minute changing from 24.6 vehicles per minute in Do Minimum to 25.2 per minute in the Do Something with the development would not be possible to pedestrians or casual observers.
- 7.2.9 The proposals which deliver a number of improvements secured through s106, that improve pedestrian and cycle infrastructure, provide a Travel Plan, fund a car club and funding towards public transport. The Transport Assessment and my updates included in this evidence have assessed the implications of the development in accordance with London Plan Policy 6.3 and LB Merton Policy DM T2 and Policy CS20.
- 7.2.10 LB Merton officers have specifically stated that no highway capacity improvements need to be delivered at the Claremont Avenue Burlington Road junction and that pedestrian and public realm improvements should be progressed instead. These measures, together with the reduced car parking on site (which accord with standards), commitments to fund a car club, travel plan and funding of bus services demonstrate that this is a proposal that accords with London Plan Policy 6.10 Walking, and LB Merton policy CS18 promoting Active Travel. I agree with officers that this is the right approach, and demonstrates that this proposal embraces the Mayors Transport Strategy, hierarchy of modes (focused on active travel) and Healthy Streets approach. There is simply no evidence therefore that the proposed development would 'contribute towards a motorised vehicle dominant environment' suggested in the reason for refusal. In my judgement there is in fact no material change in traffic flow resulting from the development.
- 7.2.11 Even if the extant use were to be ignored and the development were considered in absolute terms, the vehicle trips generated would be 58

trips in the AM and 52 trips in the PM. Again, assuming only 17.4% of these travel to the north this equates to 48 and 43 vehicle trips an hour to/ from the south in the AM and PM peaks respectively. This would represent an increase of only 3.7% in the AM and 2.9% in the PM against observed traffic flows. Again, this is well below likely daily fluctuations in peak hour traffic (+10%). A pedestrian observing traffic flow could not distinguish between 21.6 vehicles a minute passing on average and 22.1 vehicles passing every minute (or a vehicle every 2.78 seconds changing to a vehicle every 2.71 seconds). This change in traffic flow would not be noticeable.

7.2.12 The road safety conditions have been assessed within the Transport Assessment and it was concluded that no accidents that can be directly attributed to highway design or layout. There is no evidence to suggest that the small changes in traffic flow, or the continued use of the existing access would give rise to a 'harmful impact on the overall environment including safety'.

7.2.13 A second Stage 1 Road Safety Audit has been commissioned by Richard Lancaster of PWLC so that auditors could undertake a site visit during peak hours. I have reviewed that second RSA and prepared a designer's response which is enclosed as Appendix C which includes plans that illustrate amendments to the layout. Of the 4 issues raised, the designer's response can be summarised as follows:

- Crossings and tactile paving is already incorporated into the scheme but was not illustrated on the plan given to auditors. We have updated the auditors plan to provide all the information in one location.
- We have widened the central refuge island to 2m in line with TfL guidance and agree that this is a positive adjustment in line with Healthy Streets objectives.
- The access junction already serves existing movements without a keep clear facility however we could include this within the scheme if LBM agree to the loss of one vehicle length of queuing space
- The final point raised relates to a compliance issue not in our judgement a material road safety issue.

- 7.2.14 Having reviewed the second RSA and our response I do not consider that there are any outstanding road safety issues and none that would warrant reason for refusal.
- 7.2.15 The Development is located in an accessible location and has taken appropriate opportunities to promote sustainable transport modes, by keeping car parking to maximum policy standards, and funding improvements to buses, walking and cycling measures and provision of a car club. These measures mitigate the relatively minimal impacts of the development in terms of capacity and congestion and address highway safety by improving measures for more vulnerable road users. Safe and suitable access to the site can be achieved for all users.
- 7.2.16 In terms of the test set out in NPPF the change in traffic flows as a direct result of the proposed development are very low, and would not be noticeable, and the development provides funding for environmental and sustainable transport initiatives to help reduce the need to travel by car. In my judgement therefore the development cannot be considered to have a significant impact let alone a 'severe' one and therefore the proposals accord with national planning policy.

### 7.3 Part 2: Parking

- 7.3.1 The proposed level of parking equates to about 0.5 spaces per dwelling and LBM rightly officers state (paragraph 7.10.20 of the Committee report [CD7.1 *Planning Officers Report to Committee*]) that the parking provision would accord with London Plan and Draft London Plan policies.
- 7.3.2 Paragraph 7.10.22 of the committee report indicates that the Council's transport planner advises that the introduction of a new CPZ is not warranted in the neighboring residential roads due to the availability of parking in the surrounding area. I have highlighted the availability of parking in section 3.7 of my evidence including the most recent survey undertaken on behalf of PWLC which broadly corroborates the earlier

surveys but reflects an increased demand during the Covid 19 global pandemic.

- 7.3.3 The appellant has nonetheless indicated their willingness to fund a CPZ through s106 to address resident concerns, and this would give certainty that pressure on kerbside parking would not be exacerbated.
- 7.3.4 LBM Policy (CS20 part f) is to consider new or expanded CPZ where it is deemed to reduce trip generation, promote road safety and protect existing amenity. Therefore, it is expected that LBM would support the introduction of the CPZ given the funding being made available, and should this be considered necessary by the decision maker.
- 7.3.5 The Intend to Publish London Plan (CD2.2) says specifically *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.* This should be another compelling reason for LBM to support the implementation of a CPZ as a potential benefit of the scheme.
- 7.3.6 Policy therefore supports the introduction of CPZ and this is something that LBM should consider in light of wider aspirations for development with the area. Notwithstanding this point the Intend to Publish London Plan states that an absence of on street controls should not be a barrier to new development and therefore the proposals should not be refused on this basis.

## 7.4 Rule 6 Objections

- 7.4.1 The Raynes Park and West Barnes Residents Association (RPWBRA) have been awarded Rule 6 status and have submitted a Rule 6 statement. I have dealt with the transport related comments in this section.
- 7.4.2 Section 2.3 of the RPWBRA's Rule 6 Statement states *The Proposals would add considerably to traffic congestion in the area, contrary to Merton's Transport Policy DM T2 and Design Policy DM D2.* The text within that section suggests that the site is beyond reasonable walking distance of Raynes Park and Motspur Park stations. In my judgement both stations are within a reasonable walking distance, and whilst I acknowledge within section 3.5.4 that Raynes Park is beyond the arbitrary cut off distance used in the PTAL calculation, residents will

in my judgement still walk there based on my own commuting experience and National Travel Survey data relating to walk distances . Motspur Park is only 750m away and therefore well within the PTAL walking distance and very convenient.

- 7.4.3 Overall PTAL level for the site is 3 which should be considered in context, because the majority of households in outer London are in PTAL 1-3 and therefore in relative terms this reflects a good choice of transport modes. The Intend to Publish London Plan (2019) Policy H1 (2) states that:

*To ensure that ten-year housing targets are achieved, boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:*

*a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a station or town centre boundary’.*

- 7.4.4 The site therefore meets the characteristic set out in the Intend to Publish London Plan (2019) Policy H1 2a as a reservoir of housing land (*Proof of Evidence Jonathan Murch, Draft London Plan, para 4.16-4.22*).

- 7.4.5 The existing access is two way and has served the extant permitted use on the site. It is only the access between the access road and the Tesco car park that is eastbound or egress only, and this restriction has been maintained within the development proposals. I have reviewed the change in travel demand as a result of the development and considered the road safety implications and as I have set out within this evidence I do not consider the proposals to be contrary to policy.

## 8 Summary and Conclusions

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- 8.1.1 My evidence covers transport issues relating to the proposed development.
- 8.1.2 There were no transport related objections raised by London Borough of Merton officers to the proposed development and officer recommended approval within the committee report dated 13 February 2019.
- 8.1.3 Councillors at the committee resolved against the officer's recommendation and subsequently have drafted reasons for refusal which I have considered in my evidence.
- 8.1.4 My evidence relies upon the work undertaken by Mott McDonald in preparing the Transport Assessment [CD8.5 *Transport Assessment May 2019*] and associated documents in support of the planning application. I have however taken the opportunity to review some of the assumptions and agreements reached in the course of negotiations with LBM and TfL. Where I have developed an alternative approach to the conclusions I have sought to explain the reasons for that approach within my evidence.
- 8.1.5 The northern part of the site comprises commercial buildings with extant permission for B1(a) use and a total floor area of 3,880sqm. These commercial facilities are served by 100 existing on-site car parking spaces. The southern part of the site is currently used as part of the existing Tesco car park and is no longer required to serve the store. The site utilises an existing access onto Burlington Road which would be retained and enhanced with the development.
- 8.1.6 Overall the site has good access by walking, cycling, and public transport, having four frequent bus routes that serve the site and access to a number of rail stations. The site has a PTAL of 3 but this does not take into account access to Raynes Park station which is just 16 minutes walk (but over the threshold walking distance for PTAL). The site is accessible with access to a range of local facilities. This will help to deliver sustainable travel patterns in line with the Mayors Transport Strategy.
- 8.1.7 The recommendation of the Planning Applications Committee 13 February 2019 (Agenda Item 7) was to grant planning permission



subject to s106 agreement and s278 agreement which provides a number of contributions towards transport improvements.

- 8.1.8 At the TA scoping stage it was agreed with LBM officers that the whole site (3,880sqm GFA) would be treated as Office use utilising trip rates derived from TRICS. Some of the sites selected for review included sites with zero parking and I have revised the forecast to better match the location and availability of parking (some 100 spaces) at the site.
- 8.1.9 The 2019 Transport Assessment explains in paragraph 6.2.2 that the approach to estimating the trip generation associated with the proposed development presented in the TA Scoping Report was based around the application of vehicular trip rates, derived from TRICS, to the proposed accommodation schedule. Once the vehicular trips had been established, a mode share derived from Census (2011) data would then be applied to estimate the proportionate trips expected to be made by other modes.
- 8.1.10 Journey to work mode share data is not considered to represent actual residential mode shares as this does not take account of other journey purposes such as education, retail and leisure, which form a significant proportion of peak hour trips. I have therefore set out an alternative approach to more accurately forecast the proposed development trips. The mode shares for private and affordable units follows more closely the methodology proposed in the TA Scoping report. The mode shares for car driver, taxi, walking and cycling have been derived using the multi-modal trip rates for these modes as a percentage of the all person trip rate (2-way daily) which accounts for all journey purposes.
- 8.1.11 Table 16 of my evidence shows that there would be an additional 25 vehicles per hour, (equivalent to a vehicle every 2 minutes) in the morning peak hour and an additional 14 vehicles (equivalent to an additional vehicle every 4 minutes) in the evening peak hour.
- 8.1.12 This net change in vehicle trips between the alternative proposed and alternative original land uses are significantly below the 56 AM and 39 PM net change in vehicle trips forecast in the 2019 TA. That scale of change had been accepted by LBM and TfL officers as acceptable given the mitigation in place. The revised AM forecast net change in traffic is half that considered in the Transport Assessment and one quarter of the PM forecast net change. The actual net change in traffic flows

would therefore be well below that already accepted by LBM and TfL officers.

- 8.1.13 It should also be noted that the revised forecast for the proposed development shows that the proportion of trips by foot cycle or public transport (as a proportion of total daily trips) is in line with the Mayors Transport Strategy for 80% of travel demand to be by these priority modes.
- 8.1.14 I have considered the reasons for refusal in turn, dealing firstly with the traffic reason and I concluded that the development is in accordance with policy and that the residual effects of the traffic are not severe. Indeed far from member's concerns being warranted – my assessment has concluded that the original TA over-estimated impacts and that there was no proper highways reason for refusal.
- 8.1.15 In relation to car parking the provision on site is in accordance with policy as accepted by officers, and s106 funding is intended to be made available to enable LBM to implement a CPZ. London Plan and LBM policy supports the implementation of CPZ where required and the Intention to Publish London Plan states 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.*
- 8.1.16 In my judgement the proposed development accords with national, regional and local policy, the net change in traffic is negligible, the travel demand can be accommodated on the transport network and there are no transport reasons why this development should not be approved. I consider the first (putative) reason for refusal to be unfounded therefore.