

Appeal at 265 Burlington Road, LB Merton

Supplementary Statement of Common Ground – Transport Matters

1st December 2020

1. This Supplementary Statement of Common Ground (SSoCG) has been prepared by the Council and the Appellant in relation to the above appeal and in relation to part of the first draft reason for refusal of the application.
2. The Council and the Appellant have continued to work collaboratively to narrow the issues for discussion at the Inquiry.
3. Within the transport and highways evidence of Mr. Mike Savage submitted to the Inquiry on the 10th November, he set out an alternative approach to looking at impacts on the site's junction with Burlington Road, which forms part of the first draft reason for refusal. The Council, having now had an opportunity to consider the approach set out in Mr Savage's evidence no longer consider that they could sustain a reason for refusal on that basis.
4. Furthermore, the Council accept that the modelling and assumptions made by Mr. Savage in respect of the schemes impacts on that junction are accurate and this aspect of the scheme would be acceptable in planning terms.
5. The Council is therefore satisfied that the reflection of travel demand set out in Mr Savage's tables 10 (existing uses), 12 and 13 (proposed uses), 15 (net change in trips for all modes), 16 (net change for vehicular trips) and Tables 17 and 18 (net change in flows on the network) reflect a realistic assessment of the implications of the development.
6. In terms of the test set out in national, regional or local policies the change in traffic flows, taking into account the potential of the extant use of the site, are low., The development, with respect to its impact on traffic flow and congestion, would not have a significant impact or a severe highways impact.
7. It is therefore proposed to amend the first draft reason for refusal as set out below, with the text ~~struck through~~ no longer forming part of the Council's case.

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; and
- 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).

8. The Council intends to continue to contest the second aspect of that draft reason for refusal relating to parking impacts.

9. It has been agreed between the Council and Appellant that neither side will be making an application for costs in relation to this issue as both parties have worked collaboratively and in good faith.

End.