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tp bennett
architecture
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planning

17 September 2015

Jim Kehoe
Chief Planner
London Borough of Bromley
Civic Centre
Stockwell Close
BROMLEY
Kent
BR1 3UH

Dear Mr Kehoe

**REPLACEMENT SECONDARY ACADEMY AND NEW PRIMARY ACADEMY AT
HARRIS ACADEMY BECKENHAM, MANOR WAY, BECKENHAM BR3 3SJ (LBB ref: 15/00909/FULL1)
PRE-ACTION LETTER – JUDICIAL REVIEW**

I refer to the above application and to the Kelsey Estate Protection Association's (KEPA) pre-action letter received by LB Bromley on 24 July 2015. The application was considered by the LB Bromley Development Control Committee on 13 July 2015 when it was resolved to grant planning permission subject to completion of a legal agreement securing a financial contribution of £40,000 towards highways maintenance and reimbursement of the Council's associated legal costs. While the draft S106 agreement has been agreed, it has not been engrossed and no planning decision has been issued.

I am the planning agent to the applicant, Kier Construction Ltd (KCL); KCL in turn are contracted to the Education Funding Agency (EFA) to deliver these new schools which are operated by the Harris Federation. In this capacity you have provided me with copies of KEPA's original letter and of your subsequent correspondence – namely your letters of 6 August and 4 September 2015, and KEPA's letters of 12 August and 7 September 2015.

In invoking the Judicial Review Pre-Action Protocol you have sought to meet with KEPA to discuss their concerns, and a meeting was arranged for 11 September at which the applicants, as an interested party, were to be represented. KEPA, however, withdrew from that arrangement on the basis that they did not consider it appropriate for us to be present. To avoid any further delay, your letter of 11 September therefore invites us to provide any further written representations on the matters raised by KEPA; a similar request has been made to KEPA I understand. The Council will then make a decision whether or not to take the matter back to Committee.

Thank you for this opportunity to comment. The EFA, the Harris Federation and KCL are anxious that the planning decision is issued as soon as possible. The Primary Academy is now operating in temporary accommodation on the site and it is vital that its students move into permanent accommodation as soon as possible. The hold up in issuing the planning permission has already delayed the anticipated delivery of the new building beyond September 2016, resulting in very significant additional costs to the public purse.

File Reference: [R:\Active Projects\BUP\P2766 Maris Beckenham\Documents\400 Statutory Authorities\401 Local Planning Authority\JR\150917 HPABE JR response final.doc]

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I set out in the attached document a summary of the applicant's views on the substantive issues that KEPA have raised. We believe these were adequately and appropriately considered at the 13 July committee meeting.

We urge that the matter is brought back to Development Control Committee at the earliest opportunity to enable the planning decision to be issued and work on delivering this much-needed community facility to commence.

Yours sincerely,

Mike Ibbott
Director
for tp bennett

cc Gordon Carter, KCL
Gordon Powell, Stuart Sands, EFA
Jonathan Coad, Harris Federation

File Reference: [R:\Active Projects\BUP\P2766 Maris Beckenham\Documents\400 Statutory Authorities\401 Local Planning Authority\JR150917 HPABE JR response final.doc]

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HARRIS ACADEMIES BECKENHAM:

APPLICANT'S COMMENTS ON PRE-ACTION MATTERS

18 September 2015

1. LBB Development Control Committee resolved on 13 July 2015 to grant planning permission for the replacement secondary and new primary academies at Harris Academy Beckenham in Manor Way (LBB ref: 15/00909/FULL1) subject to various planning conditions and completion of a legal agreement securing a financial contribution of £40,000 towards highways maintenance and reimbursement of the Council's associated legal costs.
2. The same committee also granted planning permission for the secondary academy replacement only (LBB ref: 15/00908/FULL1).
3. KEPA (Kelsey Estate Protection Association) lodged a pre-action letter for judicial review with the LPA on 24 July 2015. The letter set out the challenge on the basis that the decision "was predicated on erroneous purposefully [sic] statistics and conclusions in the Planning Officer's report [sic] ... and was thereby fundamentally administratively flawed."
4. In the applicant's view, the matters of educational need and parking stress were very adequately addressed by the officer's report. KEPA's lengthy representations on these matters were received by the LPA on 10 July but were seen by the applicant only on the day of the committee (13 July). Nevertheless the applicant responded specifically to these issues in addressing the committee, expanding on the summary of the overall planning approach to the planning decision that had been sent in advance to Members of the Committee (on 9 July).
5. These matters were also specifically addressed by Tim Horsman (Head of Development Management) in introducing the applications to the committee and by KEPA's planning consultant Mark Batchelor (Peacock and Smith Ltd). Cllr Philpott (Assistant Portfolio Holder for Education) also addressed the committee. Members' subsequent debate made clear they understood these issues and how they weighed in the planning balance.
6. In these terms, while KEPA may disagree with the conclusions reached and the decision taken, there is no basis on which to challenge the Council's administration of that decision.
7. This note briefly restates the merits of the planning decision in the terms of the key policy test in London Plan Policy 3.18D:

"Are [there] demonstrable negative local impacts of the proposal which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the appropriate use of planning conditions or obligations?"

8. In other words, is the alleged parking stress arising from the new primary school on this site (as assessed by the Lambeth Methodology) sufficient to outweigh the educational need that is disputed by KEPA?

Educational need

9. KEPA suggest that there is no educational need and that LBB's own statistics do not show such a need. They suggest that advent of the proposed school at Langley would meet this need.
10. Since committee, this matter has been addressed in detail by the Council in Appendix A to its letter to KEPA of 4 September. In summary, the Council's Primary School Development Plan shows that there is a shortage of primary places in Planning Area 2 from the current academic year (2015/16) even with the additional 60 places provided at Harris Beckenham. This shortfall stabilises at 21-23 places by 2023/24. The Council's response of 4 September refers to a much larger deficit of some 75 places by 2020/21 if Harris Beckenham and the usual 5% allowance for parental choice are excluded.
11. The PSDP records a surplus of primary places if Planning Areas 1 and 2 are taken together, from 20 in the current academic year to a maximum of 41 in subsequent years. This is predicated, however, not only on Harris Beckenham but also Crystal Palace Primary School (2FE), and 1FE expansion at both Stewart Fleming and James Dixon Primary Schools. Of these, only Harris Beckenham has planning permission, and that only for a temporary period, and with the current application now subject to threat of Judicial Review. There remains considerable uncertainty about delivery of this additional primary capacity.
12. KEPA suggest that the proposed Park Langley School could meet this shortfall. The Council's latest data show that the educational need is such that both schools are required, serving different catchments within Planning Area 2. In any case, the Park Langley School remains a school in name only, a point stressed at the 13 July committee; there are no planning proposals for it and there is no vacant space to accommodate it even temporarily on the Langley Park Boys and Girls Schools sites which are both operating above their capacity.
13. Since Committee on 13 July, the new Harris Primary Academy Beckenham has opened in temporary accommodation on the site.
14. The Education Funding Agency reiterates its support for the permanent provision of this school. Dominic Herrington, the Regional Schools Commissioner for the South East and South London has commented to the Council as follows:

I would like to reiterate my support for this free school, which has not diminished now that the school has opened.

The Department has signed a funding agreement for the school to open; we did this on the basis that we fully expect it to offer a good quality education for primary pupils in this part of Bromley. I have confidence in the trust running the school –

Harris has considerable experience of successfully providing places at a number of other outstanding schools in London. Bromley continues to need places for primary children, and you have rightly included the school in your place planning.

Building works on the proposed permanent accommodation have not been able to start until planning permission has been granted, which is now likely to mean that pupils will be in temporary accommodation longer than originally intended. This is not in the best interest of the pupils and I hope it will be resolved shortly.

15. It seems KEPA expects these pupils to be disbursed elsewhere when the temporary permission runs out on 31 July 2017 and “the temporary schools desists in that year.” This is to ignore the detrimental impact on those pupils and the school, the on-going need for primary places in Planning Area 2, and the significant educational benefits of having a new primary school co-located with a partner secondary.

Parking stress

16. KEPA opines that the methodology agreed with the highways officer for assessing the impact of drop-off and pick-up of pupils was fundamentally flawed: they suggest that the Lambeth Methodology should only have been applied to areas within 200m walking distance of the school entrance – where their own parking survey showed parking stress of up to 125%.
17. The applicant responded to this at committee, and the applicant’s transport consultants have subsequently prepared a detailed Technical Note (attached) which was provided to KEPA with the Council’s letter of 4 September.
18. As stated at committee, the Lambeth Methodology is only a guideline; it has no policy status. The 200m distance relates specifically to permanent parking for residential development; there is an equivalent distance of 500m for commercial development. There is no such guideline for schools where parking visits are brief. Rather a common sense approach is advocated that may involve extending a survey to the next junction or other suitable location along a road.
19. This approach was agreed with the Council’s highways officer in pre-application discussions, and surveys were undertaken on 4 February 2014 and again on 6 February 2015, both Fridays when all secondary pupils start and finish at the same time – ie the maximum peak parking demand. These surveys yielded no instances of double parking.
20. The Council’s highways officer closely examined the Transport Assessment and supplementary information submitted with the planning application. He concluded that the proposal was acceptable in highways terms, subject to appropriate mitigation by way of a financial contribution of £40,000 towards highways maintenance of Manor Way (secured by planning obligation) and approval of a School Travel Plan (by condition). The proposed planning condition is worded as follows (emphasis added):

(i) Before any of the new school buildings hereby approved are first brought into use a Travel Plan shall be submitted to and approved in writing by the Local Planning Authority

(ii) The Travel Plan should include measures to promote and encourage the use of alternative modes of transport to the car and shall also include a timetable for the implementation of the proposed measures and details of the mechanisms for implementation and for annual monitoring and updating. The Travel Plan shall be implemented in accordance with the agreed timescale and details.

Reason: In order to ensure appropriate management of transport implications of the development and to accord with Policy T2 of the Unitary Development Plan

Planning balance

21. As noted above, London Plan Policy 3.18D sets out the balance to be considered in determining planning applications for new or replacement schools:

“... proposals for new schools, including free schools should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the appropriate use of planning conditions or obligations.”

22. In this case, there is a demonstrable need for additional primary school places to serve this part of the Borough. The new Primary Academy is now open and these pupils would need to be accommodated elsewhere if the permanent school were not built.

23. The design of the proposals responds appropriately to its Urban Open Space setting and has no detrimental impact on the character or appearance of the adjoining Manor Way Conservation Area.

24. The intensification of the existing school site has some impacts in terms of increased traffic. It has been demonstrated that there is more than sufficient capacity to accommodate on-street drop-off and pick-up. Impacts will be mitigated by the promotion of alternative means of travel through a school travel plan which is secured by planning condition. A financial contribution of £40,000 will also be made towards highways maintenance by way of planning obligation.

25. All other technical matters have been addressed and measures secured by planning condition as appropriate.

26. On this basis, the proposals should be granted planning permission as recommended by planning officers.

27. It is important that a decision on the new permanent accommodation for the primary school is not further delayed. KEPA's intervention has already delayed the school opening beyond

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September 2016. This is at very considerable public cost given the inefficiencies introduced into the complex construction programme while the Secondary Academy remains in operation and the need now fully to implement the temporary accommodation with four classrooms.

Mike Ibbott

Planning Director, tp bennett LLP

on behalf of Kier Construction Ltd, contractor to the Education Funding Agency

HARRIS ACADEMIES BECKENHAM:

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18 September 2015 (amended)

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Harris has considerable experience of successfully providing places at a number of other outstanding schools in London. Bromley continues to need places for primary children, and you have rightly included the school in your place planning.

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Parking stress

16. KEPA opines that the methodology agreed with the highways officer for assessing the impact of drop-off and pick-up of pupils was fundamentally flawed: they suggest that the Lambeth Methodology should only have been applied to areas within 200m walking distance of the school entrance – where their own parking survey showed parking stress of up to 125%.
17. The applicant responded to this at committee, and the applicant’s transport consultants have subsequently prepared a detailed Technical Note (attached) which was provided to KEPA with the Council’s letter of 4 September.
18. As stated at committee, the Lambeth Methodology is only a guideline; it has no policy status. The 200m distance relates specifically to permanent parking for residential development; there is an equivalent distance of 500m for commercial development. There is no such guideline for schools where parking visits are brief. Rather a common sense approach is advocated that may involve extending a survey to the next junction or other suitable location along a road.
19. This approach was agreed with the Council’s highways officer in pre-application discussions, and surveys were undertaken on Tuesday 4 February 2014 and again on Friday 6 February 2015; Friday was specifically chosen with the Council to assess the maximum peak parking demand when all secondary pupils start and finish at the same time. These surveys yielded no instances of double parking.
20. The Council’s highways officer closely examined the Transport Assessment and supplementary information submitted with the planning application. He concluded that the proposal was acceptable in highways terms, subject to appropriate mitigation by way of a financial contribution of £40,000 towards highways maintenance of Manor Way (secured by planning obligation) and approval of a School Travel Plan (by condition). The proposed planning condition is worded as follows (emphasis added):

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(ii) The Travel Plan should include measures to promote and encourage the use of alternative modes of transport to the car and shall also include a timetable for the implementation of the proposed measures and details of the mechanisms for implementation and for annual monitoring and updating. The Travel Plan shall be implemented in accordance with the agreed timescale and details.

Reason: In order to ensure appropriate management of transport implications of the development and to accord with Policy T2 of the Unitary Development Plan

Planning balance

21. As noted above, London Plan Policy 3.18D sets out the balance to be considered in determining planning applications for new or replacement schools:

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22. In this case, there is a demonstrable need for additional primary school places to serve this part of the Borough. The new Primary Academy is now open and these pupils would need to be accommodated elsewhere if the permanent school were not built.
23. The design of the proposals responds appropriately to its Urban Open Space setting and has no detrimental impact on the character or appearance of the adjoining Manor Way Conservation Area.
24. The intensification of the existing school site has some impacts in terms of increased traffic. It has been demonstrated that there is more than sufficient capacity to accommodate on-street drop-off and pick-up. Impacts will be mitigated by the promotion of alternative means of travel through a school travel plan which is secured by planning condition. A financial contribution of £40,000 will also be made towards highways maintenance by way of planning obligation.
25. All other technical matters have been addressed and measures secured by planning condition as appropriate.
26. On this basis, the proposals should be granted planning permission as recommended by planning officers.
27. It is important that a decision on the new permanent accommodation for the primary school is not further delayed. KEPA's intervention has already delayed the school opening beyond

September 2016. This is at very considerable public cost given the inefficiencies introduced into the complex construction programme while the Secondary Academy remains in operation and the need now fully to implement the temporary accommodation with four classrooms.

Mike Ibbott

Planning Director, tp bennett LLP

on behalf of Kier Construction Ltd, contractor to the Education Funding Agency



TECHNICAL NOTE

Project Title: Harris Academy, Beckenham, Kent
Reference: SRD/gm/JNY8123-09
Date: 13 August 2015

RESPONSE TO KEPA JUDICIAL REVIEW REQUEST

Introduction

- 1 This Technical Note has been produced by RPS in response to the Pre-Action Letter – Judicial Review produced by Kelsey Estate Protection Association (KEPA) in respect of planning application number DC/15-00909-FULL1 approved by London Borough of Bromley (LBB) on Monday 13 July 2015.
- 2 The KEPA letter requests a Judicial Review on the grounds that the Development Control Committee, in approving the above application, was subject to procedural impropriety in respect of the content of the reports to the Committee submitted by the LBB traffic officer, conservation officer and planning officer.
- 3 The report to committee by the LBB highway officer refers to parking beat traffic surveys undertaken on behalf of RPS. These were included in the Transport Assessment dated February 2015 (RPS ref SRD/NB/sb/JNY8123-02D), which was submitted with the planning application.
- 4 An Objection to the above planning application was submitted on behalf of KEPA by Peacock & Smith Ltd to the Planning Authority immediately prior to the scheme being considered at Planning Committee.
- 5 With regard to the highways and transportation aspects of the proposals, the basis of the objection was the perceived opinion that the Transport Assessment uses flawed methodology in respect of the parking surveys.

Review of KEPA statement

- 6 An Objection to the proposals was submitted on behalf of KEPA by Peacock & Smith Ltd to the Planning Authority immediately prior to the scheme being considered at Planning Committee. This set out KEPA's reasons for objection.
- 7 Dealing specifically with the parking issues associated with the proposals, Paragraph 7.17 of the Peacock & Smith report states that the parking beat surveys undertaken by RPS did not rigidly adhere to the Lambeth Methodology for parking surveys, as this requires surveys of links within 200 metres walking distance of the site. It further states that:

'It is plainly practically implausible to suggest that school children from the age of 4 years would be dropped off by parents such a long distance from the school's entrance and the fact that the applicant seeks to rely on such evidence serves only to undermine the credibility of its case'.

- 8 On that basis it was suggested that the parking beat surveys 'do not conform to the requirements of the Lambeth Methodology', and therefore 'the Transport Assessment has resulted in an erroneous analysis'.
- 9 Pursuant to this, KEPA appointed SLR Consulting to commission a parking beat survey to these parameters which demonstrated a parking stress of up to 125%, within 200 metres of the school gates. This appears to form the basis of KEPA's position that the transport assessment contains erroneous analysis and their ongoing objection to the proposals on grounds of excessive parking demand at dropping off and picking up times during school term-time.
- 10 The parking beat surveys were agreed with LBB transport officer and undertaken in accordance with the Lambeth Methodology set out in Lambeth Council Parking Survey Guidance (November 2012). The initial parking surveys were undertaken on Tuesday 4th February 2014 and supplementary additional surveys undertaken on Friday 6th February 2015.
- 11 The latter survey was undertaken on a Friday when all secondary pupils start and finish school at the same time, rather than the staggered start and finish times applied by the school between Monday and Thursday. This ensured that the maximum peak parking demand for the school was observed.

Response to KEPA statement

- 12 KEPA suggest that the parking beat surveys 'do not conform to the requirements of the Lambeth Methodology', and therefore 'the Transport Assessment has resulted in an erroneous analysis'.
- 13 An Objection to the proposed development was submitted on behalf of KEPA was by Peacock & Smith Ltd to the Local Authority setting out its reasons for objection. This stated in Para 7.17 that the parking beat surveys undertaken by RPS was not correctly followed as the Lambeth Methodology requires surveys of areas within 200 metre walking distance of the site.
- 14 On that basis KEPA instructed SLR Consulting to commission a parking beat survey to these parameters which demonstrated a parking stress of up to 125%, within 200 metres of the school gates. This forms the basis of their view that the transport assessment contains erroneous analysis.
- 15 In response, it is pertinent to consider the wording and general content of the Lambeth Guidance note, the most recent Lambeth Methodology is dated November 2012 and attached at **Appendix 1**. It should be noted that nowhere in the guidance note does it state that parking surveys should be undertaken within 200 metres of a school gate.
- 16 The 200 metres distance set out in the guidance specifically refers to residential development, to cover the area where residents of a proposed development may want to walk, and generally covers an area of 200 metres around a site.
- 17 For commercial developments the area should cover an area within 500 metres walking distance of a site. It does not specifically refer to a school site. With regard to the extent of the survey, the guidance note actually states:

'Since people are unlikely to stop half way along a road at an imaginary 200 / 500 metre line so the survey should be extended to the next junction or shortened to the previous one, or taken to a suitable location along a road'.

- 18 The guidance also specifically states 'that common sense should be applied in all cases.' The above does not appear to have been taken into account by KEPA or its consultants.
- 19 In practical terms, if no parking was available within 200 metre dropping off distance of the school access at a given time, parents would be likely to park slightly further away as they do in all similar situations elsewhere. They would not be stopping on the carriageway or double parking in immediate proximity to the access. Indeed, the parking beat surveys confirmed that no double parking was undertaken on the carriageway, including during the peak periods.
- 20 Parents would not be restricted to parking only within a maximum distance of 200 metres from the school gate, and therefore the area of survey should be extended further than the set distance to a reasonable point.
- 21 In line with this specific guidance, all roads within a 200 metre walk of the school have been included. Manor Way has been surveyed up to the footway north of Kelsey Way, with the full length of Kelsey Way and Little Acre, which are considered as being appropriate, rather than using a set cut off point.
- 22 There is flexibility in how the Lambeth guidelines are applied to other types of development. This is particularly pertinent in this instance as the issue relates to short term dropping off parking where available spaces are only briefly occupied, unlike residential / commercial development where spaces may be occupied by a single vehicle for a large part of the day.
- 23 Given the above, there would be no foreseeable impact in the condition of highway safety in the vicinity of the school.
- 24 In terms of walking distances to schools, the Institution of Highways & Transportation document 'Guidelines for Providing for Journeys on Foot' sets out, in Table 3.2, the suggested acceptable walking distance of 500 metres. The extent of the parking beat surveys is therefore considered to be well within acceptable distances over which pupils may be reasonably expected to walk to school, especially for older pupils.
- 25 It is important to note that the Parking Survey Guidance Note produced by Lambeth Council is aimed purely at providing guidance within the London Borough of Lambeth. It is not intended to form a policy or standard that needs to be rigorously complied with. Indeed, the guidance states that applicants should contact the Council prior to undertaking a survey. Although the guidance states that the guidelines should be followed, if they are not then the Council may choose not to make a full assessment rather than being in a position of being unable to do so.
- 26 Furthermore, although the Lambeth Guidance is often used as a basis for carrying out assessments within other London Boroughs, the document has no policy status. As such, there is no prescriptive reason why any supporting documents for a planning application situated wholly within the London Borough of Bromley would need to comply with guidance produced by an adjoining borough.
- 27 The Highway Authority, (LBB), has been consulted with regard to the extent and methodology of the surveys. The KEPA letter is incorrect in its statement that the Highway Authority does not have locus and discretion to agree the terms of the Lambeth Methodology, as Lambeth Council itself sets out that these are guidelines to be agreed in consultation with the Council and based on common sense rather than a prescriptive threshold. These guidelines can be applied by other Local Authorities as they feel appropriate.

- 28 The KEPA letter states that these points were raised with the Local Authority prior to the Committee with a request for the Transport Assessment to be reviewed. The letter omits the fact that this request was raised in the email of 10th July 2015 from Peacock and Smith, with the Committee date on the 13th July 2015, leaving unreasonable time to review and provide a full response to the objections.

Conclusions

- 29 This Technical Note has been produced by RPS in response to the Pre-Action Letter – Judicial Review produced by Kelsey Estate Protection Association (KEPA). This Technical Note considers the matters raised by KEPA in the letter regarding the report by the traffic officer, which specifically refers to the parking beat traffic surveys undertaken by RPS, and set out in the Transport Assessment dated February 2015.
- 30 KEPA state that the traffic surveys undertaken do not adhere precisely to the methodology set out in the Lambeth Council Parking Survey Guidance Note and therefore the assessment provides a dilution of the existing and projected parking situation. These statements by KEPA are based specific references within the guidance notes and ignore further advice within the document that the parking surveys should not be restricted to the specific distances to suitable locations on a road but based on common sense.
- 31 The 200 metre distance repeated by KEPA indeed only refers to residential development rather than specifically to school development. The parking beat surveys were agreed with the Highway Authority in line with parameters set out within the Lambeth guidance, and is therefore considered to be appropriate.
- 32 Overall, regardless of the precise nature of the methodology employed, it is clear that the proposed development would not lead to increased long term parking demand, fly-parking in a dangerous manner or any other perceptible highway impact. The Highway Authority has fully considered the proposals and has no objection to the proposed development.

APPENDIX 1 – LAMBETH COUNCIL PARKING SURVEY GUIDANCE NOTE

The survey is designed to provide an overview of the current parking situation in Lambeth Council areas. It will identify areas where parking is a problem and provide information on the current parking situation. The survey will also identify areas where parking is not a problem and provide information on the current parking situation. The survey will also identify areas where parking is not a problem and provide information on the current parking situation.

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For more information, please contact the Parking Survey Team at Lambeth Council. For more information, please contact the Parking Survey Team at Lambeth Council. For more information, please contact the Parking Survey Team at Lambeth Council.

LAMBETH COUNCIL PARKING SURVEY GUIDANCE NOTE

1. INTRODUCTION AND POLICY BACKGROUND

Most forms of development have the potential to increase the amount of on-street parking, more commonly known as parking stress. High parking stress can affect highway safety, the free-flow of traffic, amenity, access by emergency services, refuse collection and delivery of goods. Investigation of this impact forms an important part of the Council's analysis of proposed developments and therefore it is essential that enough information is submitted by a developer to allow a full analysis of the issue. An unacceptable increase in parking stress, or the submission of an insufficient level of information, can lead to a recommendation for refusal of a planning application.

Lambeth's policies on parking related to new development are based on the Mayor's London Plan, the Core Strategy and the saved policies of the Council's Unitary Development Plan 2007 (UDP). Developers are particularly advised to read Chapter 6 (London's Transport) of The London Plan, and the policies and standards, particularly Table 6.1 Parking Standards, contained therein. Chapter 6 of The London Plan can be viewed on the GLA's website at the following address:

<http://www.london.gov.uk/shaping-london/london-plan/strategy/chapter6.jsp>

Developers are also advised to read Criteria (f) of Core Strategy Policy S4, and the saved elements of UDP policies 14 and 17, although policy 39 may also be relevant. The Core Strategy and the saved policies of the UDP can be viewed on the Council's website at the following address:

<http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/PlanningPolicy/LDFCoreStrategy.htm>

Ordinarily the Planning Department will not validate a residential planning application without a parking survey. In some cases parking surveys are required for commercial developments as well, depending on the scale and nature of the development. Submitting a survey enables the Council to make an informed decision, within statutory planning timescales, and benefits applicants in obtaining a quick decision.

A developer can propose on-site parking bays up to the maximum stated in Table 6.1 of the London Plan but in areas of high PTAL and within a CPZ a car free development (and permit exempt) would be expected unless acceptable justification is provided. However, even where on-site parking is proposed this may not accommodate all cars generated by a development, so a parking survey may still be required. An assessment of likely car ownership of future occupants can then be undertaken to understand the scale of any overspill parking. The cumulative effect of other consented development in the immediate area will also need to be taken into account when assessing the effect of parking on street.

Advice on whether a survey is required can be obtained from the Council's Transport Planning team by emailing transportplanning@lambeth.gov.uk with details of the proposed development. If a survey is not required a written response will be provided confirming this and should be submitted with the planning application.

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1st Floor Blue Star House
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2. UNDERTAKING A SURVEY

The following guidelines should be followed when undertaking a survey. If these guidelines are not followed the Council may not be able to make a full and proper assessment of the proposal.

Residential Developments

The Council requires a parking survey to cover the area where residents of a proposed development may want to park. This generally covers an area of 200m (or a 2 minute walk) around a site. For further detail see 'Extent of survey' below.

The survey should be undertaken when the highest number of residents are at home; generally late at night during the week. A snapshot survey between the hours of 0030-0530 should be undertaken on two separate weekday nights (ie. Monday, Tuesday, Wednesday or Thursday).

Commercial Developments

Surveys for commercial developments should cover an area within 500m walking distance (or a 5 minute walk) of a site. For further detail, see 'Extent of survey' below. Surveys should generally be done during proposed opening hours on an hourly beat basis.

Excluding the extent and time of the surveys the same principles apply as a survey for a residential development as set out below, but developers should contact the Council for further advice.

Survey times

For sites close to any of the following land uses, additional survey times may be necessary:

- Town centre locations: surveys should be undertaken Monday-Wednesday only.
- Regular specific evening uses close to the site (eg. church, etc): additional surveys should be undertaken when these uses are in operation.
- Commercial uses close to the site: morning and early evening surveys may also be required due to conflict with commuter parking. In these cases surveys between the hours of 0700-0830 and 1800-1900 may be required, noting the amount of parking on a 15-minute basis over this time.
- Railway stations/areas of commuter parking: additional morning and evening peak hour surveys will be required in order to assess the impact of commuter parking. These should be done between 0700-0800 and 1730-1830.

Surveys **should not** be undertaken:

- in weeks that include Public Holidays and school holidays and it is advised that weeks preceding and following holidays should also be avoided;
- on or close to a date when a local event is taking place locally since this may impact the results of the survey.

In some cases, the hours of the survey may need to be extended or amended. Applicants should contact the Council prior to undertaking a survey if there is any doubt.

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Extent of survey

All roads within 200 metres (or 500m for commercial uses) walking distance of the site. Note this area is **NOT** a circle with a 200/500m radius but a 200/500m walking distance as measured along all roads up to a point 200/500m from the site.

Since people are unlikely to stop half way along a road at an imaginary 200/500m line so the survey should be extended to the next junction or shortened to the previous one, or taken to a suitable location along a road.

The following areas should be *excluded* from surveys:

- If the site is in a CPZ any parking bays in an adjoining CPZ should be excluded.
- If the site lies adjacent to, but not in, a CPZ then all roads in that CPZ should be excluded.
- Areas that fall outside of Lambeth should be excluded.
- Places where drivers are unlikely to want to park, for example:
 - If there is no possibility of parking somewhere within the 200m boundary
 - If drivers would not wish to park in an area, due to perceived safety issues, or difficulty in accessing the parking for example.

Common sense should be applied in all cases and the extent of the survey area and justification for any amendments should be included in the survey. If inadequate justification is provided for a survey area then amendments may be required or a recommendation made accordingly.

Required Information

The following information should be included in the survey results, to be submitted to the Council:

- The date and time of the survey.
- A description of the area noting any significant land uses in the vicinity of the site that may affect parking within the survey area (eg. churches, restaurants, bars and clubs, train stations, hospitals, large offices, town centres etc).
- Any unusual observations, e.g. suspended parking bays, spaces out of use because of road works or presence of skips, etc.
- A drawing (preferably scaled at 1:1250) showing the site location and extent of the survey area. All other parking and waiting restrictions such as Double Yellow Lines and Double Red Lines, bus lay-bys, kerb build-outs, and crossovers (vehicular accesses) etc should also be shown on the plan.
- The number of cars parked on each road within the survey area on each night should be counted and recorded in a table as shown below. It would be helpful to note the approximate location of each car on the plan (marked with an X).
- Photographs of the parking conditions in the survey area can be provided to back-up the results. If submitted, the location of each photograph should be clearly marked.

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Areas Within A Controlled Parking Zone (CPZ)

Only Resident Permit Holder (RPH) Bays and Shared Bays which allow residents parking (these may be shared with Pay-and-Display parking and/or Business Permit Holders) should be counted.

To calculate parking capacity each length of parking bay must be measured and then converted into parking spaces by dividing the length by 5 (each vehicle is assumed to measure 5m) and rounding down to the nearest whole number. For example a parking bay measuring 47m in length would provide 9 parking bays ($47/5=9.4=9$). The capacity of each separate parking bay must be calculated separately and then added together to give a total number of parking spaces for each road in the survey area.

The results should generally be presented in the following format (figures given as an example):

Street Name	Total Length (m) of parking spaces	No. of RPH parking spaces	No. of cars parked in RPH bays	RPH Parking Stress (%)
A Street	350	70	70	100
B Street	250	50	40	80
C Street	150	30	10	33
Total	750	150	120	80

A separate note should be made of any areas where cars can legally park overnight. These are generally Single Yellow Lines or Single Red Lines (SYL/SRL) or short term parking or Pay-and-Display bays (ST). The number of cars parked in these areas should be counted and presented separately.

Areas Not In A Controlled Parking Zone (CPZ)

All areas of unrestricted parking should be counted. To calculate parking capacity each length of road between obstructions (such as crossovers, kerb build-outs, yellow lines, etc) must be measured and then converted into parking spaces by dividing the length by 5 and rounding down to the nearest whole number. For example a length of road measuring 47m in length would provide 9 parking bays ($47/5=9.4=9$). The capacity of each section of road must be calculated separately and then added together to give a total number of parking spaces for each road in the survey area.

The distance between crossovers should be measured in units of 5m. For example, if the distance between 2 crossovers or a crossover and a junction is 12m then only 10m should be counted in the survey, and any space between crossovers measuring less than 5m should be discounted from the calculation. For reasons of highway safety, the first 5m from a junction should also be omitted from the calculation.

A map or plan showing the measurements used in calculating parking capacity should be supplied so that this can be verified by the Council. The parking survey may not be accepted if this is not supplied.

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The results should generally be presented in the following format (figures given as an example):

Street Name	Total Length (m) of kerb space	Length of unrestricted parking (m)	No. of parking spaces	No. of cars parked on unrestricted length of road	Unrestricted Parking Stress (%)
A Street	400	350	70	70	100
B Street	300	250	50	40	80
C Street	200	150	30	10	33
Total	900	750	150	120	80

UNDERSTANDING THE RESULTS

The results of the parking survey will be analysed by the Council in accordance with the London Plan and saved policies in the Council's UDP, any Supplementary Planning Documents produced by the Council in relation to parking, and any other Transport policy guidance produced by the Council, Transport for London, or nationally.

The Council will also take into consideration the impact of any recently permitted schemes in determining the acceptability or not of each proposed development.

Note that stress levels of over 100% stress (or 100% occupancy level) are possible. This is because small cars may need less space than 5 metres to park, meaning that additional cars can be accommodated.

FURTHER ASSISTANCE

For further assistance or explanation please contact the Council's Transport Planning and Strategy team at the address below

Spanish

Si desea esta información en otro idioma, rogamos nos llame al 020 7926 2618.

Portuguese

Se desejar esta informação noutro idioma é favor telefonar para 020 7926 2618.

Yoruba

Tí ẹ ba ẹ imoràn yí, ní èdè Òmiràn, ẹjẹ, ẹ kàn wà l'ágogo 020 7926 2618.

French

Si vous souhaitez ces informations dans une autre langue veuillez nous contacter au 020 7926 2618.

Bengali

এই তথ্য অন্য কোনো ভাষায় আপনার প্রয়োজন হলে অনুগ্রহ করে ফোন করুন 020 7926 2618.

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