

The Council's Highway Engineer has commented as follows. Please note the abbreviation 'LM' refers to the Lambeth Methodology.

(1) KEPA: -

With specific reference to the following statements by the Kelsey Estate Protection Association (KEPA);

RPS point out that the detailed application of the LM is not prescribed and is designed to be flexible and common sense should prevail. However, they fail to mention that its application is proscribed by the test of rationale and reasonableness and a judgement about rationale and reasonableness is implicitly referenced against the 200m non-commercial and 500m commercial limits, otherwise that distinction within the LM would be meaningless.

.....RPS should not have presented 500m survey data and whilst the traffic officer may not have realized the error the Authority should have taken remedial action once and at whatever point the error was pointed out.

I make the following comments:

A school is not a residential development. There is distinct difference between the parents visiting a school at peak times and occupiers of a residential development where during the evening the private cars are parked on street for long periods. Nowhere in the LM guidance does it specify that parking surveys should be limited to 200m of a school. The LM guidance does state that common sense should be applied in all cases.

Professional judgement was used to accept a greater distance than 200m as this equates to not more than an extra 2 minutes' walk. This is entirely consistent with the LM guidance to use 500m for non-residential development. This distance is not meant to be rigid and should take into account logical break points such as road junctions so the actual distance used may be greater or less than 500m depending on local circumstances.

There was no error in accepting the survey data provided; therefore no remedial action was required.

(2) Applicants: -

With reference to RPS Technical Note for Project JNY8123 - Harris Academy, Beckenham

I agree with its contents; the survey may have extended beyond a 200m radius but this does not mean that the report is misleading. An additional walking distance of 300m would add an extra 2 to 3 minutes to the walking time which is negligible. Please bear in mind that a 200m radius mentioned in the Lambeth methodology generally covers where the occupiers of a proposed residential development may want to park. The Guidance Note goes on to say that commercial developments should cover an area within 500m (or a 5 minute) walking distance. Therefore the survey carried out by RPS group is not misleading.