

**PROPOSED EDUCATIONAL DEVELOPMENT,  
BULLERS WOOD SCHOOL FOR BOYS, ST HUGHES PLAYING FIELD, BICKLEY**

**Review of Proposals (Planning Ref: 17/02468/FULL1) against Inspectors Reasons for Dismissal for Previous Similar Refused Proposals (Planning Ref: 16/03315/FUL)**

**1.0 Introduction**

- 1.1 This note has been prepared on behalf of the London Borough of Bromley to aid decision making with respect to a planning submission (Planning Ref: 17/02468/FULL1) for the above proposed educational development, hereinafter referred to as the 'current proposals'. The current proposals were considered by members at the committee meeting on 4 October 2017. The committee was informed by the planning officers report which recommended that the application be refused for the following reason:

*'The potential traffic generation and capacity of the existing highway network along with the proposed access arrangements raise both road and pedestrian safety concerns that have not been fully addressed in the proposal and are likely to cause severe cumulative impacts contrary to Policy T18 of the Unitary Development Plan 2006 and paragraph 32 of the National Planning Policy Framework 2012.'*

- 1.2 Notwithstanding the above recommendation for refusal, members resolved that the application for the current proposals be granted.
- 1.3 The development site was subject to a previous planning application for similar development (Planning Ref: 16/03315/FUL) which was refused by notice dated 31 January 2017, hereinafter referred to as the 'refused scheme'. The applicant appealed against this decision, however the appeal was dismissed by the inspector on highways safety grounds, decision date 11 December 2017 (Appeal Ref: APP/G5180/W/17/3181149).
- 1.4 As the appeal decision for the refused scheme was issued after the committee meeting took place, the members could not take into consideration the findings of the inspector in their consideration of the current proposals. This note therefore considers the implications of the inspector's decision letter in this context.

**2.0 Review**

- 2.1 An examination of the appeal decision shows that the refused scheme was dismissed for 8 main reasons. Each of the reasons are reproduced in the following report in italics and a review is provided to determine if and how the reasons apply to the current proposals.

Reason 1

*'The junction between Bickley Road and Chislehurst Road comprises a mini-roundabout which is situated in a physically constrained location and has single lane traffic entry on each of its three arms. A survey, undertaken by the appellant, has shown there to be significant queueing on the Bickley Road and Chislehurst Road approaches to this roundabout in the morning and evening peak periods. Indeed, I viewed the roundabout a number of times during the day of my site visit and, when I viewed it at 15.00 hours, the queue on the Bickley Road approach extended back further than the access to the appeal site. This is much greater in length than the queue recorded in the appellant's queue survey for the same time on a weekday. My observed queueing on the A222 continued beyond the roundabout to the west as far as the Plaistow Lane signal controlled junction, which is some distance from the roundabout. This indicates to me that the A222 is a busy part of the TLRN and not just heavily trafficked at the appeal site. It also leads me to the view that peak time queuing on Bickley Road is likely to include the area of the access to the appeal site between the proposed school peak traffic hours of 07.30 to 08.30 and 15.00 to 16.00.'*

- 2.2 The inspector noted that traffic currently queues back along Bickley Road from the Bickley Road/Chislehurst Road junction, past the access to the appeal site, a distance of approximately 170m (or 30 vehicles) during the School PM Peak (15:00 to 16:00).
- 2.3 The impact of the current proposals, which are the subject of this note, on the Bickley Road/Chislehurst Road junction were set out in the Technical Note (TN) issued by DHA Transport in August 2017, hereinafter referred to as the 'TN'. Table 0-7 of the TN shows the recorded queue length on Bickley Road was 5 vehicles during the School PM Peak (15:00 to 16:00).
- 2.4 The TN and associated modelling is therefore based upon different queue lengths than those noted by the inspector.

### Comment

The inspector undertook a site visit and noted that traffic is currently queueing back past the site access (30 vehicle queue) during the school PM peak. This is new information that should be considered when determining the application for the current proposals.

### Reason 2

*'The proposal would incorporate a one way pupil drop-off and pick-up traffic route within the appeal site between a new access on Chislehurst Road and the existing site access on Bickley Road. The single file route could accommodate 50 vehicles along its length and would have a specific drop-off and pick-up area which could accommodate a further 10 vehicles. The appellant's traffic forecasts suggest that 118 vehicles would need to exit this route onto Bickley Road during each of the school peak hours. The appellant's network diagram for development traffic shows that some 80% of these exit movements would be to the west along Bickley Road. For a steady flow of traffic from the appeal site, this would generally equate to a vehicle requiring exiting every 40 seconds.'*

- 2.5 Table 0-3 of the TN that accompanied the planning application for the current proposals predicts that, during the AM and PM peak, 62 and 43 vehicles respectively would exit from the site onto Bickley Road.
- 2.6 The traffic distribution predictions for both the refused scheme and the current proposals were based on the postcode information of the prospective pupil's home addresses. Appendix Z of the Transport Assessment dated November 2016, which accompanied the refused scheme, predicted that 80% of trips from the school would exit right onto Bickley Road. Whereas, Appendix AD of the Transport Assessment dated May 2017, which accompanied the application for the current proposals that are the subject of this note, predicts that 43% of trips from the school would exit right onto Bickley Road. It is unclear why the traffic distribution predictions for the refused scheme would differ so significantly from current proposals given that they are both based on postcode information, which is stated within the respective Transport Assessment and Technical Note to 'largely correspond' with the postcode information of the existing girl's school. It is noted that this information would have been available to the committee when it made its decision
- 2.7 Notwithstanding the concerns raised in paragraph 2.6 regarding the revised distribution, assuming 43% of vehicles would exit right from the school this would equate to one vehicle exiting west every 2 to 3 minutes during the network AM and School PM peak periods.

2.8 The dismissed scheme was predicted to generate a much higher level of peak-hour traffic than the current proposals. However, the TA for the current proposals assumes, amongst other initiatives, that 33% of the pupils would arrive before the AM peak to attend a Breakfast Club. The impact of these initiatives is based on assumption rather than on real data and, as previously advised, there is concern that the traffic impact during the AM peak has been underestimated within the TA. Table 1 below compares the vehicle trip generation of the refused scheme with the vehicle trip generation of current proposals based on values within Table 6.5 of the November 2016 TA and Table 0-3 of the August 2017 TN respectively.

*Table 1: Two-Way Vehicle Trip Generation Dismissed Scheme vs. Current Proposals*

Time	Dismissed Scheme	Current Proposals
07:30-08:30	245	134
15:00-16:00	235	86
17:00-18:00	40	38

2.9 Since the submission of the TA, the applicant has suggested that the right turn from the site is banned. It is noted that the banned movement would require those wishing to turn right to undertake a detour of 1.2km via Page Heath Lane and Bird-In-Hand lane. This arrangement would make the school access arrangements unattractive for drivers who would normally turn right on exit, as such they may instead choose to drop-off or pick-up on the roads surrounding the site to the detriment of highway safety.

**Comment**

Reason 2 sets out the likely frequency of vehicles exiting right out of the school, an analysis that forms part of an interrelated line of reasoning.

Reason 3

*‘Such an exit movement would need to cross the eastbound traffic on Bickley Road during peak times and could have to join a queue of traffic in the westbound direction caused by a lack of capacity in the existing highway network. This movement would not take place under managed circumstances, as would be the case at a roundabout, but would rely on the courtesy of drivers in the queue and possibly those travelling eastbound on Bickley Road. This, when combined with the frequency at which the movement would have to be made to accommodate traffic generated by the proposal, would result in a severe and unacceptable impact in terms of highway safety and suitability for those accessing the site. This would conflict with paragraph 32 of the National Planning Policy Framework and UDP1 Policy T18.’*

2.10 The proposals are predicted to result in fewer vehicles seeking to egress onto Bickley Road when compared to the refused scheme. However, without the banned right turn there would still be a significant number of vehicles attempting to turn right out of the school into the queue of traffic in the network AM peak and the school PM peak in an unmanaged fashion. Table 2 shows the number of vehicles which are predicted to turn right out of the school for both the dismissed scheme and the current proposals based on the tables and data referenced in paragraphs 2.6 and 2.8 of this note.

*Table 2: Right Turning Vehicles out of School, Dismissed Scheme vs. Current Proposals*

Time	Dismissed Scheme	Current Proposals
07:30-08:30	94	27
15:00-16:00	94	18
17:00-18:00	32	16

- 2.11 Should a banned right turn be implemented, this would be likely to result in dropping-off and picking-up on the roads surrounding the site to the detriment of highway safety as described in the review against Reason 2.

### **Comment**

The finding of the inspector regarding the severe and unacceptable impact on highway safety as a result of vehicles turning right out of the school onto Bickley Road is new evidence and should be considered when deciding the application.

### Reason 4

*'A further consequence of these circumstances would be that school related drivers, who would be likely to be very regular in their arrangements, may not choose to use the route through the site due to the nature of its exit and the potential for delay. This could mean that pupils would be dropped-off and picked-up on the surrounding roads.'*

- 2.12 The finding of the inspector that school related drivers may choose to drop-off and pick-up on the roads surrounding the site to the detriment of road safety applies similarly to the current proposals as it does to the refused scheme. This finding appears to stem primarily from the queue length observations undertaken by the inspector during the site visit.
- 2.13 As noted in the review of Reason 2, should the banned right turn be installed, those wishing to turn right out of the site may choose to park on the roads surrounding the site to avoid a lengthy diversion.

### **Comment**

The finding of the inspector that school related drivers may choose to drop-off and pick-up on street due to the poor function and lack of safety of the egress onto Bickley Road is new evidence which should be considered when deciding the application for the current proposals.

### Reason 5

*'On Bickley Road, frequent vehicle stops for such purposes would be incompatible with the strategic nature of the road and its peak queuing. On Chislehurst Road, the limited width of the road, the absence of any footway to one side and peak queuing would carry an unacceptable risk of pedestrian or vehicle conflict when vehicles stop to drop-off or pick-up. Furthermore, this road is a yellow route on the London Cycle Network, which denotes a recommended quieter route. The dropping-off or picking-up would be likely to conflict with the aims of this designation in terms of the hazards presented by short term waiting vehicles. Pines Road would be some distance from the main entrances to the school and would be less likely to be so used. As a result of all of the above, the proposal would have a severe and unacceptable cumulative impact on highway safety on Bickley Road and Chislehurst Road which are already subject to a lack of capacity at peak times.'*

- 2.14 The inspector found that school related dropping off and picking up activity would be incompatible with the existing designation and arrangement of the roads surrounding the site for the following reasons:
- Bickley Road is a strategic traffic route subject to peak queueing; and
  - Chislehurst Road has limited width, it has no footway to one side, is subject to peak queueing and is designated by Transport for London as a route on quieter roads recommended by cyclists.
- 2.15 As a result of the above, the inspector concluded that the development ‘would have a severe and unacceptable cumulative impact on highway safety on Bickley Road and Chislehurst Road’. This conclusion applies similarly to the proposals as it does to the refused scheme.

### Comment

The finding of the inspector that dropping-off and picking-up activity generated by the proposals would have a severe and unacceptable cumulative impact on highway safety on Bickley Road and Chislehurst Road applies to the current proposals and should be considered when deciding the application.

### Reason 6

*‘The appellant has suggested that delays to vehicles passing through the site would be generally 1 minute. As a result of the potential need to join a queue of traffic on Bickley Road however, I am not satisfied that this would be the case. It has also been suggested that the proposal would not have a residual and severe impact on the transport network that would conflict with paragraph 32 of the Framework. I accept that the quantum of additional traffic that would result from the proposal would not have a severe impact in this regard. It is however the mechanisms by which this traffic, and its users, would interact with other traffic on the network which is my concern and which, in my view, would be likely to prevent the achievement of safe and suitable access to the appeal site in conflict with paragraph 32 of the Framework. In terms of the limited vehicle stop times to drop-off or pick-up, this interaction would be difficult to regulate.’*

- 2.16 The conclusion that the proposals would not be likely to achieve safe and suitable access to the appeal site in conflict with paragraph 32 of the Framework stems primarily from the queue length observations undertaken by the inspector during the site visit.
- 2.17 The finding of the inspector regarding the achievement of safe and suitable access to the appeal site applies similarly to the proposals as it does to the refused scheme.

### Comment

The finding of the inspector that delays to vehicles would be longer than stated by the applicant and that the interaction between users of the access and other traffic would prevent the achievement of safe and suitable access to the appeal site in conflict with paragraph 32 of the Framework is new information and should be considered when determining the application.

## Reason 7

*'I acknowledge that the proposal would have a different car use modal split than the recently permitted Eden Park school development but, even with this different split, I have still found the proposal to be unacceptable in terms of highway safety. I recognise that queue length modelling techniques can be unstable and may over predict queue lengths where roundabouts are reaching their capacity and that the techniques can be less accurate when used on mini-roundabouts. Here however, I have seen queue lengths that are greater than those predicted and these points do not therefore add weight in favour of allowing the appeal.'*

- 2.18 The inspector noted the poor correlation of the traffic modelling with the observed queue length observations undertaken during the site visit.

### **Comment**

The finding of the inspector that the queue lengths predicted by the traffic modelling does not correlate with the queue lengths observed during the site visit is new information and should be considered when determining the application.

## Reason 8

*'I therefore conclude that the proposal would have an unacceptable adverse impact on highway safety and that it would thus conflict with UDP Policy T18 and the Framework.'*

- 2.19 The finding of the inspector regarding the unacceptable adverse impact on highway safety and the conflict with UDP Policy T18 and the Framework applies equally to the proposals as it does to the refused scheme. This finding stems primarily from the queue length observations undertaken by the inspector during the site visit.

### **Comment**

The conclusion of the inspector that the proposal would have an unacceptable adverse impact on highway safety and that it would thus conflict with UDP Policy T18 and the Framework is relevant to the current proposals and should be considered when determining the application.

## **3.0 Summary & Conclusion**

- 3.1 The inspector's key concern regarding the dismissed scheme is that vehicles would be unable or find it difficult to turn right out of the site due to the existing queueing on Bickley Road preventing the safe and proper functioning of the school access arrangements. The inspector's concern about safety at the egress is clearly an important matter to be taken into account. His additional concern as to the implications for drop-offs and pick-ups is also relevant where it will have safety implications.
- 3.2 It is concluded that the reasons the appeal was dismissed by the inspector would apply similarly to the current proposals. The applicant has therefore not demonstrated that the residual cumulative impact of the development will fall short of severe in the context of paragraph 32 of the NPPF. As such, further information should be requested from the applicant or the application should be refused.