



TRANSPORT DOCUMENT REVIEW
The Porcupine Inn, Mottingham

**Engineering, Design and
Surveying Consultants**

from inception to completion

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1.0 Introduction

- 1.1 Glanville were appointed by the London Borough of Bromley, to provide an independent review of the transport information provided in support of the planning application for the re-development of the former Porcupine Inn in Mottingham into a new Lidl food store. The site is located on the B266 Mottingham Road in Mottingham, within the London Borough (LB) of Bromley.
- 1.2 The LB Bromley planning application reference is 19/01670/FULL1.
- 1.3 The development proposals involve the demolition of the existing 324sqm public house and the construction of a 1,352sqm food store with associated 33 space car park. Vehicular access will be achieved via an improved site access off Mottingham Road, located around 30m east of the War Memorial roundabout.

Information Used Within the Review

- 1.4 The following information has been obtained from the LB Bromley planning website and assessed within this review:
- Transport Assessment (CG/18047/TA02) dated March 2019;
 - Delivery, Servicing and Waste Management Strategy (18047) dated 01 February 2019;
 - Car Park Management Strategy (JRB/18047/CPS/1) dated January 2019;
 - Technical Note 01 – Highways Response to Non-Statutory Comments (CG/18047/TN01/01) dated July 2019;
 - Technical Note 02 – Highways Response to Statutory Comments (JRB/18047/TN02/01) dated August 2019;
 - Technical Note 03 – Highways Response to Councillor Cartwright (JRB/18047/TN03/00) dated April 2020;
 - Assessment of Pedestrian Circulation Space pre and post Development (SCP/18047/TN04) dated 20 May 2020; and
 - Travel Plan (CG/18047/TP02) dated March 2019.
- 1.5 In addition to the above information, SCP Transport has provided the original speed surveys and traffic surveys used within the assessment and these have been utilised during this review. Due to the reduction in traffic levels resulting from the COVID-19 lockdown, independent traffic surveys have not been undertaken as they would not provide a representative assessment of typical traffic levels. This review is therefore based on professional experience, the original traffic surveys and national guidance in preparing Transport Assessments and assessing the cumulative impacts of the development.
- 1.6 It is supported by a site visit undertaken between 2pm and 6pm on Thursday 18 June 2020. It is acknowledged that this site visit took place during the COVID-19 lockdown. This was discussed with LB Bromley and it was agreed that the site visit should continue in order for decision to be reached on the application and that we should assess the application based on unbiased past experience. It should be noted, that at the time of the site visit, shops had re-opened, schools had re-opened for some pupils and workplaces were open for employees who were unable to work from home and therefore traffic was returning to typical levels.

1.7 Recommendations resulting from the review have been highlighted in bold and collated within Section 11 of this report.

1.8 This review is based on the following Planning Policy and guidance documents.

- National Planning Policy (NPPF) – March 2018
- The Traffic Management Act 2004: Network Management in Response to COVID-19
- The London Plan – March 2016
- The Mayor’s Transport Strategy – March 2018
- Bromley Local Plan (adopted 2019);
- Bromley Unitary Development (now superseded by the Bromley Local Plan);
- Design Manual for Roads and Bridges;
- Manual for Streets; and
- Manual for Streets 2.

Conflict of Interest

1.9 Glanville confirms that there is no conflict of Interest with the following parties which would impact the independence of this review:

- LB Bromley – the planning and highway authority;
- Lidl Great Britain Ltd – the applicant;
- SCP Transport – the Transport Consultant;
- Walsingham Planning – the Planning Consultant; and
- JHB Consulting – the safety auditors.

1.10 It is therefore confirmed that this report provides a fully independent review of the transport aspects of this planning application.

2.0 Background to the Application

2.1 This chapter provides a background to the planning application and the review.

Current Planning Application

2.2 The current planning application was submitted in May 2019 and validated by LB Bromley in June 2019. Since then, the application has been under consideration by LB Bromley.

2.3 The application consists of the demolition of the existing porcupine Public House, which closed in 2013, and replacing it with a new 1,352sqm Lidl food store with a 749sqm retail floor space. The application includes a 33 space car park which will be accessed via a new kerbed priority T-junction off the B266 Mottingham Road.

Previous Planning Application

2.4 It is understood that a previous planning application was submitted in 2013 by Lidl for the same site, although the store was slightly smaller with a 1,306sqm total floor space but it had a larger retail floor space of 800sqm, whilst 35 parking spaces were being proposed. This application was refused by LB Bromley and was appealed by the applicant. The highway related reasons for refusal were as follows:

- The proposed junction access, servicing and parking arrangements do not meet necessary criteria and will give rise to unsatisfactory vehicle and pedestrian conflicts, detrimental to conditions of safety in the highway and free flow of traffic and contrary to Policy T18 of the Unitary Development Plan.
- The proposed development by reason of the amount of buildings and hardstanding, limited landscaping and the resulting potential vehicle and pedestrian conflicts would constitute an overdevelopment of the site, harmful to the character and appearance of the area and adjacent residential properties, contrary to Policy BE1 of the Unitary Development Plan.

2.5 The appeal hearing was undertaken in 2014 by an Inspector from the Planning Inspectorate. It was rejected on highway safety grounds, amongst other non-highway reasons. The specific highway reasons for dismissal were as follows:

- During deliveries some parking spaces would need to be coned off preventing customers from using them;
- Insufficient visibility was proposed at the site access which would create a safety issue as the attention of drivers on Mottingham Road would be focussed on the adjacent War Memorial roundabout; and
- The alternative access options suggested were not considered to be suitable.

2.6 The Inspector confirmed that he was happy with the proposed parking provision of 35 spaces and that large delivery vehicles would take both sides of the carriageway when turning in and out of the site.

2.7 Following this dismissal, the applicant has submitted a revised application which responds to the Inspector's concerns.

3.0 Transport Assessment

3.1 This chapter provides a detailed review of the Transport Assessment produced by SCP Transport and dated March 2019 (document reference CG/18047/TA02).

Development Proposals

3.2 The Transport Assessment sets out that the proposed store has a total floor space of 1,352sqm and a total retail floor space of 749sqm. It will be accessed via a single kerbed vehicular access off Mottingham Road and will provide 33 parking spaces, two of which will be reserved for blue badge holders and two for parents and children. Six spaces will be electric vehicle charging spaces consisting of three active and three passive spaces. There will be six long term cycle spaces for staff and 20 short stay spaces for customers.

3.3 It is understood that there will be 6-7 staff on site at any one time out of a pool of 40 employees. No information is provided on shift patterns or how the shift turnover affects vehicle trips or parking provision. Similarly, the Transport Assessment does not provide any information on anticipated opening hours.

Policy Review

3.4 The policy section did not include a review of the Mayors Transport Strategy. This document provides the Mayor of London's aims and objectives towards transport. In particular, it aims for 80% of all trips in London to be made by walking, cycling and utilisation of public transport by 2041 (in 2015 this was 63% of 26.7 million total daily trips with an anticipated 33 million total daily trips in 2041). Therefore the proposals need to encourage sustainable transport use.

3.5 The previous application was rejected due to a conflict with Policies T6, T7 and T18 of the Unitary Development Plan. In 2019, the UDP was superseded by the LB Bromley Local Plan and therefore Glanville has undertaken a review to identify if the proposed development accords with the transport policies within the Local Plan. The following policies are considered relevant to the application and which the proposed development accords with.

- Policy 31 – Relieving Congestion
 - This policy requires developments to be located in areas accessible by sustainable modes of travel, encouraging walking and cycling, incorporating improvements to the highway network and supporting the planning applications with a Transport Assessment and Travel Plan.
- Policy 32 – Road Safety
 - The potential impact of any development on road safety will be considered by the Council to ensure that it is not significantly adversely affected.
- Policy 33 – Access for All
 - The council will ensure that development proposals are designed for people with disabilities including crossing provision and that the impact on public transport is assessed.

- Policy 34 – Highway Infrastructure Provision
 - New developments should be designed to ensure ease of access for people with disabilities or mobility impairments. New accesses should be considered subject to road safety requirements.

Accessibility of the Site

- 3.6 Chapter 4 of the Transport Assessment reviews accessibility of the site by various modes. The walking and cycling accessibility of the site has been assessed based on 2km and 5km respectively. It is considered that this is appropriate for staff, however, it is considered unlikely that shoppers would walk such distances with heavy shopping.
- 3.7 The Chartered Institute for Highways and Transport’s (CIHT) ‘Providing for Journeys by Foot’ (2000) identifies that the maximum acceptable walking distance to and from town centres would be 800m. Similarly SCP state that a typical shopping duration for Lidl shoppers is 20 minutes whilst Table 3.3 of the CIHT’s guidance identifies that for shopping durations of up to 30minutes, an acceptable walking distance for car borne shoppers is only 100m. Consequently, rather than assessing a pedestrian accessibility of 2km, it is considered that a maximum of 800m for customers would be more appropriate for walking to and from the store and 100m for shoppers who drive.
- 3.8 Glanville acknowledges that the reduction in walking distances for both residents and car borne shoppers was addressed by SCP within their Technical Note 02.
- 3.9 It is agreed that the site has a PTAL rating of 2 and it is considered that this is a typical provision for Outer London. It should also be noted that the site is on the boundary with the area classed as PTAL rating 3, i.e. the area near Court Road, based on Transport for London’s online WebCAT database and therefore is at the top end of the PTAL 2 area. Consequently, the site has better public transport accessibility than areas immediately to the north of the site.

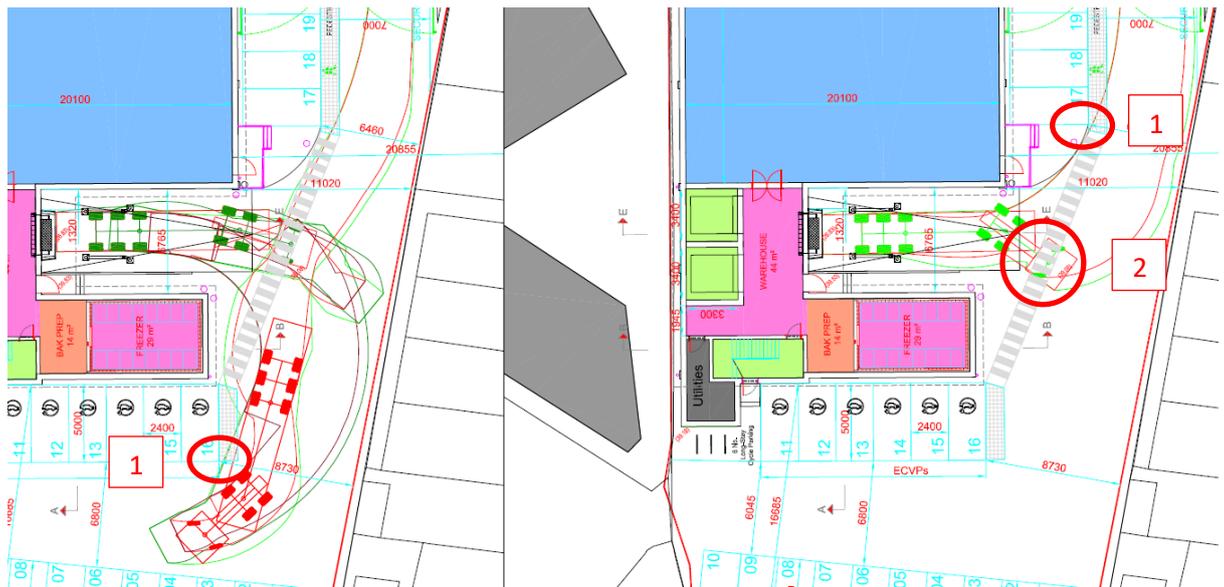
Accident Analysis

- 3.10 The accident assessment was undertaken in 2018 based on data extracted from the Crashmap website rather than obtaining detailed information from Transport for London. This data was for a period between 2013-2017 and covered fifteen collisions (14 slight and one serious). Whilst it is considered likely that the assessment years were appropriate at the time of writing, it should be noted that a further three accidents have occurred within the assessed area since the Transport Assessment was written.
- 3.11 The Transport Assessment provided a summary of each accident which occurred within the area assessed. All of these accidents were classed as driver error. However, no detailed review of each accident was undertaken which assessed the potential detailed causes of the collisions for example assessing if there were visibility concerns or that the carriageway surface resulted in a loss of grip.
- 3.12 Despite the above comments, however, Glanville have reviewed the data and confirms that there does not appear to be a defect in the highway which affects road safety and therefore the assessment is accepted. Consideration could be given, however, to updating the accident assessment to cover the latest period between 2018 and 2020 due to the length of time this application has been under consideration.

Servicing and Deliveries

- 3.13 The Transport Assessment states that there will be 'one delivery per day sometimes two during peak times e.g. the Christmas period'. This appears to contradict the servicing information provided within the Delivery and Servicing Management Strategy which identifies that there will be 1 to 2 deliveries per day and 2 to 3 during peak periods and will occur outside the store's opening hours or overnight. Similarly, the Designers Response contained within Appendix 7 of the Transport Assessment also states that there will be two deliveries per day. **Clarification is therefore required as to the number of deliveries per day and whether any deliveries will occur overnight.**
- 3.14 The servicing and delivery arrangements have been reviewed and Glanville's findings are summarised below and addressed within paragraphs 3.15 to 3.18.
- a) The swept paths provided within Appendix 6 of the Transport Assessment shows that delivery vehicles can access the site. They will, however, need to use both sides of the road to turn in and out of the site;
 - b) When accessing the site, a car and a delivery vehicle are unable to pass each other within the store access. This may cause delays on Nottingham Road whilst delivery vehicles wait for any queueing vehicles to depart the site;
 - c) The swept path of the delivery vehicle shows that the manoeuvre when accessing the loading bay is achievable although relatively tight in places. Typical sized cars will be able to fit within the bays with clearance to the bay edges, however if large cars are parked in spaces 16 and 17 then this may increase the potential for the vehicles being clipped by the delivery vehicle. Similarly, large cars are sometimes longer than 5m and therefore often stick out of the end of a parking bay which may increase the risk of large vehicles being clipped by the HGV (see points 1 within Image 1). For space 17, however, it appears that there is a bollard adjacent to the space which provides protection for the parked vehicle. It should also be noted that the tracking software provides a worst case swept path and therefore in real life, the vehicle movements tend to be better than that shown by the swept path software; and
 - d) When reversing into and when parked within the loading bay, the delivery vehicle blocks the pedestrian desire line and the marked pedestrian route between the store entrance and the rear of the car park (see point 2 in Image 1).

Image 1– Areas of concern with the HGV Turning within the Car Park



- 3.15 With respect to large delivery vehicles accessing the site (points a and b), Glanville consider that these concerns would still occur if the site reverts back to a public house as dray vehicles are also large vehicles without the added benefit of articulation. To address the two concerns about delivery vehicles accessing the site, a larger junction would be required but this would have significant adverse safety impacts on pedestrians and cyclists and therefore a balanced approach is required. It should be noted, however, that deliveries would be a relatively infrequent occurrence and therefore Glanville considers that the access junction is suitable for delivery vehicles. **It is recommended, however, that ‘Keep Clear’ markings are considered to keep the access open if there is queueing from the War Memorial roundabout** (see paragraphs 3.48 and 3.61).
- 3.16 It is understood that one of the reasons for refusal of the previous appeal was that an HGV, when manoeuvring into the loading bay, would encroach the adjacent parking bays. Whilst the HGV swept paths are relatively tight, the swept paths do show that it is possible to turn the HGV without encroaching into the bays and therefore responds to the Inspector’s concerns about having to block off parking spaces during deliveries. Similarly, it is important to note that delivery drivers are highly trained and regularly make deliveries within operational car parks and are therefore experienced at manoeuvring within confined areas amongst pedestrians.
- 3.17 With respect to Glanville’s concerns about pedestrian movements during the store delivery times, the Delivery, Servicing and Waste Management Plan (see Chapter 4) identifies that the delivery vehicles have an audible and white noise warning system to make pedestrians aware of reversing vehicles. As outlined in paragraph 3.16, it is considered that delivery drivers are used to servicing stores within car parks and are therefore fully aware of pedestrian movements. It should also be noted that vehicles will be moving slowly within the car park and therefore it is considered that the risk to pedestrians is reduced.
- 3.18 Based on the above concerns it is considered that the servicing of the store is a typical arrangement throughout the country and therefore drivers are fully aware of the risks when manoeuvring. The swept path information provided shows that vehicles are able to manoeuvre within the car park and the delivery arrangements are therefore considered to

be acceptable. **If LB Bromley have continued concerns about the servicing arrangements, then consideration could be given to using smaller delivery vehicles or restricting delivery to outside of peak shopping times.** It should be noted, however, that using smaller vehicles is likely to increase the number of daily deliveries required.

Delivery Vehicle Routings

- 3.19 Paragraph 6.13 of the Transport Assessment states that deliveries will be undertaken from the Regional Distribution Centre in Belverdere with the most appropriate route being via Eltham along the A208 and using Court Road. Whilst it is assumed that HGV's can already make these manoeuvres, no evidence has been provided to confirm that it is feasible without compromising the safety of other vehicles and pedestrians. **It is recommended that a swept path assessment is provided showing that large vehicles can safely access and egress Court Road from the A208 Mottingham Road.**
- 3.20 Similarly, no mention is made of the existing weight limit on Court Road, however, it might be that this restriction was introduced after submission of the application. This weight limit is shown within Image 2 and a similar limit is provided on West Park. Consequently, if this is to be the main route for delivery vehicles, all deliveries would need to be restricted to between Monday to Friday 7am to 9pm and on Saturday 7am to 1pm. No HGV access via Court Road would be achievable outside of these times unless a smaller delivery vehicle is utilised. **LB Bromley and Lidl may, therefore, wish to consider restricting delivery times, identify a different route or utilise a smaller delivery vehicle to service the site.**

Image 2 – Existing Weight Limit restrictions on Court Road



- 3.21 Whilst deliveries are anticipated to use Court Road, articulated HGV swept paths have been provided to show that HGVS can enter and depart the site via the War Memorial roundabout. No evidence, however, has been provided to show that an articulated HGV can safely negotiate the roundabout but, as this is an existing junction on a main road and has a wide circulatory carriageway, it is assumed that such vehicles can negotiate the roundabout safely.

Vehicle Parking

- 3.22 Glanville understands that 33 parking spaces are being proposed. The London Plan states that for food related retail, a maximum provision of one space per 20-30sqm should be provided for sites within an area with a PTAL of 2. This equates to a maximum range of

between 34 and 52 spaces allowable, based on a floor size of 1,031sqm which excludes circulation space.

- 3.23 Whilst the 33 spaces provided reflects a slight reduction on the range specified it is acknowledged that the Inspector at the Appeal considered that 35 spaces for a slightly larger retail floor space of 800sqm was appropriate. This reflected a rate of one space per 22.9sqm based on retail floor space. When this ratio is applied to the current proposed retail floor space of 759sqm, this equates to 33 spaces. As the London Plan parking standards reflect maximum requirements, it is considered that the reduction in one space is considered acceptable.
- 3.24 Glanville has checked the parking accumulation calculations provided within Figures 7.3 and 7.4 and confirms that it is correct based on the TRICS data. This indicates that on a Saturday there is likely to be one excess vehicle trying to park. Based on this data, it is considered unlikely that this would result in a severe off-site parking impact as the parking beat survey shows that there is sufficient off-site parking. However, this is dependent on the parking accumulation at this site matching the TRICS data for other Lidl stores and that the average duration for shopping at Lidl store is 20-25 minutes. **It is considered, therefore, that the provision of parking survey data and customer parking durations for similar sized Lidl stores would provide additional evidence that the parking provision is appropriate.**
- 3.25 There is considered to be a significant risk that, due to the low provision of town centre parking within Mottingham, shoppers will utilise the Lidl car park for shopping within the Town Centre. This will impact the number of Lidl related vehicles that would be able to park on-site potentially pushing customers onto neighbouring residential roads. It is acknowledged that the Car Park Management Strategy specifies that signage will be provided stating that parking is for Lidl customers only, but it is not sure how this can be enforced. **It is therefore considered that further information should be provided and a planning condition potentially considered for ensuring continued parking management.**
- 3.26 The proposed provision of two disabled spaces and two parent and child spaces, accords with the London Plan requirement for 6% of spaces to be restricted as such. The provision of three active and three passive electric car charging spaces also accords with the London Plan requirement for 10% of spaces to be suitable for electric vehicles.

Parking Beat Surveys

- 3.27 The parking beat surveys showed that there was sufficient off-site parking to accommodate any excess parking based on the TRICS parking accumulation data. It should be noted that some roads are considered to be too narrow for safe on-street parking (Mottingham Lane, College View and part of Court Farm Road), however, it is considered that even when these roads are discounted, there is sufficient off-site parking available. During the site visit, even though the lock down was in operation and more people were staying at home, there was still off-site parking available.
- 3.28 As outlined within paragraph 3.7, Table 3.3 of the CIHT's guidance on pedestrian journeys identifies that for shopping durations of up to 30 minutes, an acceptable walking distance for car borne shoppers is 100m. It is therefore considered that a parking survey covering 500m is too extensive and may distort shopping related parking availability. This was raised by LB Bromley and SCP has responded to this within Technical Note 2 which still showed sufficient off-site parking.

- 3.29 It is important to note, however, that no information has been provided for parking requirements, parking accumulation or parking duration during the peak periods for example Christmas and therefore the potential impact at these times is unknown. It is acknowledged, however, that at these busy times there will be staff on hand to ensure that vehicles do not queue out of the car park resulting in Mottingham Road being blocked.

Cycle Parking

- 3.30 The proposed six long stay cycle spaces and the 20 short stay spaces accords with the Local Plan minimum requirements. As these are minimum requirements, the provision represents the bare minimum provision required. It is recommended that consideration is given to identifying locations where additional cycle parking can be provided in the future if demand exceeds provision, particularly with respect to the new COVID 19 guidance provided by the Government.

Site Access

- 3.31 Vehicular access to the site will be via a single kerbed priority T-junction onto Mottingham Road, at a location around 30m south east of the War Memorial roundabout. This access will be 7m wide in order to accommodate the delivery vehicles associated with the store.
- 3.32 As outlined within paragraph 3.15, a delivery vehicle accessing the site will be unable to pass outbound cars queueing to leave the site. This would potentially cause queuing and delays on Mottingham Road, which may impact the operation of the War Memorial roundabout. It is considered, however, that this would be an infrequent occurrence as it is unlikely to occur every time a delivery takes place as the junction capacity modelling shows that queuing at the site access will be negligible.
- 3.33 It is considered that the site access arrangement proposed by SCP Transport is acceptable and that the visibility splays shown in SCP's drawing SCP/18246/0000/002 Rev C within Technical Note 02 are appropriate. Glanville consider that it responds appropriately to the Inspector's concerns about the previously proposed visibility splay (see Images 3 and 4).

Image 3 – Visibility to the Left



Image 4 – Visibility to the Right



- 3.34 To confirm that the visibility splays are appropriate, the 2014 speed surveys have been obtained from SCP. These showed 85%ile speeds are 29.6mph northbound and 26.4mph

southbound (averaged over surveyed days). This indicates that 43m visibility splays in accordance with Manual for Streets for 30mph are appropriate. It should be noted that these surveys are relatively old and Glanville would typically recommend that newer surveys are undertaken. No new speeds surveys were undertaken as part of this review, however, due to the Covid-19 lockdown and because they were not included within LB Bromley's scope of work. However, as the layout of the road network has not changed since 2014, in a manner which would impact vehicle speeds, it is considered that the original speed surveys remain valid and appropriate for continued use.

- 3.35 Glanville acknowledges that the site access proposals require the re-alignment of the kerb which results in the narrowing of the existing footway outside the library. This would reflect, at its greatest point, a reduction of 1.3m from 3.3m to 2.0m. The rest of the narrowing is less than one metre and ensures that a 2m footway is retained throughout.
- 3.36 Whilst this is considered to be a relatively large reduction at the point of its greatest narrowing, the retention of a 2m footway continues to meet national standards. Both Manual for Streets (paragraph 6.3.22) and Inclusive Mobility (Figure 2.3) identify that a 2m footway is sufficient for two wheelchairs to pass and for a visually impaired person with a guide dog to safely use it.
- 3.37 Glanville acknowledges the concerns about the footway narrowing occurring outside the library. There is, however, a large area of public realm / communal space immediately outside the library which provides sufficient circulation space for pedestrians and users of the library (see Images 5 and 6). It is acknowledged that SCP have undertaken a further assessment of the impact of this narrowing in light of the Government's COVID 19 guidance and this is discussed further within Section 9 of this report. However, **consideration could be given to undertaking a 'Level of Service' assessment to assess the impact of the narrowing on pedestrians, although this would be subject to obtaining suitable pedestrian surveys.**

Image 5 – Existing Footway outside of the Library



Image 6 – Existing Public Realm Outside the Library



- 3.38 It is important to note, however, that any development on this site, including a return as a Public House, will require the visibility splay to be improved. This is because, if the access is moved further north, there would be safety concerns due to its proximity with the War Memorial roundabout. Alternatively consideration could be given to reducing the speed limit on Mottingham Road to 20mph which would reduce the visibility requirements and

would benefit cyclists but would potentially require traffic calming due to the relatively straight nature of Mottingham Road.

Consideration with Respect to the CoVID-19 Guidance

- 3.39 LB Bromley has requested that the site access arrangements are considered based on the new COVID-19 guidelines from the Government (The Traffic Management Act 2004: Network Management in Response to COVID-19). This guidance requires consideration to be given towards widening footways to encourage pedestrian use. However, consideration must also be given to ensuring that a suitable carriageway width is retained and that appropriate visibility splays are provided to maintain highway safety.
- 3.40 The solution proposed by SCP works and accords with national design guidance but conflicts with the new COVID-19 guidance, although the improved footway width on the site side of Mottingham Road accords with the guidance. A balance would therefore need to be taken with this location to ensure that a safe access can be provided for any development on the site combined with minimising the impact on pedestrians and cyclists.
- 3.41 Consideration could therefore be given to assessing different options such as a build out or reducing the posted speed limit on Mottingham Road to reduce the visibility requirements.
- 3.42 Further consideration could also be given to reducing the size of the flower bed outside the library to provide additional footway width. LB Bromley has confirmed that this land falls within a third party lease to a third party who runs and maintains the library on behalf of the council. Consequently, the feasibility of this would need to be investigated and confirmed by the Council's legal department to ensure that it does not impact the terms of the lease.

Pedestrian Crossing

- 3.43 A raised uncontrolled pedestrian crossing is proposed at the site access. This has been located along the pedestrian desire line for accessing the proposed store but it is located away from the desire line for pedestrians travelling between the town centre and the War Memorial roundabout. It is important to note that the raised crossing is located around 5m from the edge of the Mottingham Road carriageway. Therefore if an inbound vehicle has to stop for a crossing pedestrian when turning into the site, the rear of any vehicle over 5m in length would stick out into the Mottingham Road carriageway. Similarly the same vehicle departing the site will partly block the pedestrian crossing. It is understood from the Designers Response to the Safety Audit that the location of the crossing will be reviewed at the detailed design stage but consideration would need to be given to ensure that it does not adversely impact the pedestrian desire line.
- 3.44 Based on the above review, it is considered the pedestrian crossing location is appropriate.

Road Safety Audit and Designers Response

- 3.45 The Stage 1 Road Safety Audit (RSA) was undertaken by JHB Consulting and a copy was provided within Appendix 7 of the Transport Assessment (JHB/LM RSA1Rev0). This Audit identified eight concerns with the proposals and Glanville consider it to be appropriate.

- 3.46 The RSA was accompanied by a Designers Response from SCP (TW/18246) and dated 13 March 2019. Glanville considers that both the RSA and the Designers Response are appropriate for this stage of the application and design process.
- 3.47 In response to concerns 3 and 4 within the Audit, Glanville agree that 'keep clear' markings should be provided to minimise the potential for queueing traffic to block the site access. With respect to the comment about the pedestrian crossing at the site access (concern 6), a balance will be required between locating the crossing and ensuring that waiting vehicles do not block Mottingham Road (see paragraph 3.44).

Trip Generation and Highway Impact Assessment

Trip Generation

- 3.48 The trip rates within the Transport Assessment have been reviewed and appear to be appropriate. They have been extracted from TRICS, the industry standard database, and are based on 'Discount Food Store' sites and retail floor space.
- 3.49 The sites selected are Lidl stores from the Midlands and, whilst none of the sites utilised are located in London, a review of TRICS has indicated that there are no London based sites with a similar PTAL rating. It is therefore considered that the trip generation and the arrival and departure profiles is going to be similar to the proposed site in Mottingham as the trip rates reflect only existing Lidl stores in areas with average to poor public transport provision.
- 3.50 The trip generation has only been provided for the weekday PM peak hour and the Saturday peak hour. There has been no assessment of the AM peak hour or a Sunday peak hour. No reason has been provided for this.
- 3.51 It should be noted that there is a travel demand associated with the proposed store during both the AM peak hour and on Sundays. Whilst there are fewer site related trips, the AM peak hour typically has a higher volume of background traffic because more traffic is typically travelling at this time due to people arriving for work by 9am and the inclusion of school traffic. Similarly, trading hours for a Sunday are constrained into a shorter period due to the 'Sunday Trading Laws' and therefore there is liable to be a heavier concentration of development flows during the peak hour. Consequently, consideration should be given to assessing the impact of the site during these times or providing justification as to why this is not required.

Pass-by Trips

- 3.52 Glanville accept that 49% of the trips will be pass-by trips based on the research undertaken within the TRICS Research Report 14/1. However, whilst these may not be new trips, they will be using the Lidl car park due to the lack of town centre parking. It is considered that the pass-by trips have been included appropriately within the assessment.

Traffic Surveys and Distribution

- 3.53 The 2018 traffic surveys and traffic distribution has been checked and can be confirmed to be acceptable. Similarly, the traffic flow diagrams contained within Appendix 10 of the Transport Assessment are considered to be acceptable.

Modal Splits

- 3.54 SCP have provided modal splits for both staff and customers. The staff modal split is taken from the 2011 census journey to work information for Bromley, Lewisham and Greenwich. This shows that 29% of staff will likely be driving to and from the store. This is considered appropriate, however it has not been applied to the total number of staff at the store. It should be noted that SCP states that the proportion of staff driving to the site presents a similar figure to car ownership levels. The car ownership proportion of 29%, however, relates to the number of people who do not own a car and therefore who would not drive to and from the site. As TRICS provides vehicle trips which include staff movements, it is considered that the modal share is more relevant for the Travel Plan.

Highway Impact Assessment

- 3.55 The Highway Impact assessment chapter assesses a weekday PM peak hour (17:00 to 18:00) and a Saturday peak hour. As outlined within paragraph 3.53, consideration should be given to assessing the AM and Sunday peak hours or justification provided as to why this is not required.
- 3.56 The TEMPRO growth factors and the 2018 traffic surveys have been reviewed and are considered acceptable.

Junction Capacity Modelling

- 3.57 The assessment of the War Memorial roundabout has been undertaken using an ARCADY model developed for the 2013 planning application. This model was validated based on queue length data obtained during the traffic surveys and confirmed as appropriate for use by the Inspector at the Appeal hearing. It is understood, however, that no re-validation was undertaken using the 2018 traffic surveys as no updated queue length surveys were undertaken.
- 3.58 Whilst the roundabout geometry is unlikely to have changed, the change in traffic flows and the potential change in distribution would potentially impact this validation. Glanville therefore consider that the junction should have been re-validated based on 2018 queue length surveys. During the PM Peak hour, however, the site observations indicated that the ARCADY modelling results outlined within Table 9.1 of the Transport Assessment provided an accurate reflection of the operation of the junction. It is important to remember, however, that the site visit was undertaken during the COVID-19 lockdown although traffic was returning to its normal levels. As no queue surveys were provided with the traffic surveys, no validation could be undertaken based on a typical day's activities but despite the untypical traffic volumes, based on past experience at similar junctions, it is considered that the modelling remains accurate.
- 3.59 The site visit did show that there was occasionally a longer queue on Mottingham Road during the period 3pm to 4pm. This was due to the number of vehicles using West Park and resulted in queues of up to 4 or 5 vehicles. However this queue very quickly dispersed and did not cause any junction capacity concerns or identify any concerns for the operation of the proposed site access. This length of queueing was not observed in the PM peak hour and so it is considered to be an infrequent occurrence. **It is again recommended, however, that 'Keep Clear' markings are provided at the site access to ensure that queueing vehicles do not block the site access.**

- 3.60 The site access PICADY model has been reviewed. It is considered acceptable with the exception of the minor road visibility being shown as 15m. In fact it is considered to be at least 20m, however, the figure modelled reflects a worst case and so it is considered to be acceptable.
- 3.61 It should be noted that the traffic flows appear to have been input into both the War Memorial roundabout ARCADY model and the site access PICADY model as vehicles, however, the settings within the models appear to reflect PCUs. This is liable to reflect a lower heavy vehicle impact. **It is therefore recommended that this is checked and either the settings changed to reflect vehicles as an input value or the flows re-input as PCUs.**
- 3.62 Based on the junction capacity modelling, it is considered that the impact of the proposed development on the operation of Mottingham Road and the War Memorial cannot be considered as severe in accordance with the NPPF. This is confirmed through the percentage impact assessment contained within Table 9.5 which indicates that the highest impact of 2.3% is experienced during the weekend peak hour.

4.0 Delivery, Servicing and Waste Management Plan

- 4.1 SCP Transport has provided a Delivery, Servicing and Waste Management Plan (DSWMP) and this is dated February 2019. This section just provides comments on the DSWMP as paragraphs 3.13 to 3.18 of this review provide Glanville's comments on the servicing arrangements of the proposed store.
- 4.2 There appears to be some contradiction between the DSWMP and the Transport Assessment with respect to delivery hours. Paragraph 6.12 (iii) of the Transport Assessment states that there will be one delivery a day although sometimes during the peak periods there will be two per day whilst these deliveries will typically take place between 6am-7am or between 10pm and 11pm. The DSWMP, however states that there will typically be one/two deliveries per day with two/three at peak periods and that deliveries will occur out of hours but that Lidl are able to take deliveries during the day. Similarly, the DSWMP also states that deliveries may occur between 23:00 and 07:00 (Concern 9). **It is therefore recommended that SCP should therefore clarify the anticipated times and frequency of deliveries to remove any confusion.**
- 4.3 It is considered that if Lidl does undertake deliveries at night, **then confirmation should be provided as to how often this will occur and a complaints procedure is set up for local residents.**
- 4.4 It is acknowledged that the deliveries will be managed by the store manager in order to ensure that the impact is minimised as much as possible and that the store will be pre-warned prior to the arrival of the delivery vehicle. Similarly, it is also acknowledged that delivery vehicles remove the waste from the store, thereby minimising delivery and servicing vehicle movements.

5.0 Car Park Management Strategy

- 5.1 SCP Transport has provided a Car Park Management Strategy (CPMS) and this is dated January 2019 (document JRB/18047/CPS/1). This report sets out how the ANPR enforcement will be undertaken in order to limit parking to 90 mins with no return within an hour. Glanville consider that the report is acceptable but is recommending that further clarification and information is provided. This is outlined below:

Parking Duration

- 5.2 No information has been provided as to how the 90 minute parking duration was identified. Within item 4 within Technical Note 2, SCP states that whilst the average shopping duration will be 25 minutes, some customers may stay for up to 40 minutes. As parking is limited within the town, consideration should be given to restrict parking to 45 minutes or 60 minute rather than 90 minutes.
- 5.3 As the parking provision will be dependent on the quick turnover of spaces, **consideration should be given to providing parking survey information from existing Lidl stores, if available, to confirm the customer parking duration. This will provide confidence in the length of duration and parking provision.**

Restriction of Town Centre Parking

- 5.4 As outlined within paragraph 3.25, people may park in the car park to visit the town centre, particularly as there is restricted off-site town centre parking, thereby reducing spaces for customers. It is acknowledged that the Car Park Management Strategy specifies that signage will be provided stating that parking is for Lidl customers, but it is not sure how this can be enforced. **Confirmation should be provided as to how this will be enforced through the ANPR system and a condition considered for ensuring continued parking management.**
- 5.5 It is assumed that the enforcement will be undertaken by a third party.

Car Parking Hours of Operation

- 5.6 No information has been provided as to the likely opening hours of the store or when the security gate will be closed. Similarly, signage should be considered to inform the public as to when the car park gate will be locked.

On-site Enforcement

- 5.7 It is considered that SCP will also need to provide confirmation as to whether the electric vehicle charging point will be available to non-customers and if not, there is no indication as to how this will be managed. It is understood that users of the car park will be restricted to a duration of 90 minutes but no clarification has been provided as to how this will impact customers who leave their electric vehicle to charge. It is assumed that this 90 minute limit will still apply but cars can take longer than this to charge depending on the type of charger provided.
- 5.8 Whilst there will be ANPR enforcement for the duration of the stay, no mention is made of whether there will be on-site enforcement to prevent non-blue badge holders from parking

in the disabled bays or customers parking outside of the parking spaces, particularly in front of the loading bay when deliveries are expected.

- 5.9 The CPMS identifies that during the peak periods such as Christmas, staff will be on hand to ensure that vehicles do not queue out of the site. No information, however, is provided on how the duration of stay changes at these peak times or what instructions will be given to drivers i.e. will they be told to park off-site or will they be informed to return at another time. Similarly, are there any proposals in place in case customers ignore the advice of the staff as this may impact the operation of Mottingham Road?
- 5.10 Glanville acknowledges that there is a mechanism for appealing the Penalty Charge Notices along with a list of exemptions where the fines will be cancelled.
- 5.11 **It is therefore recommended that consideration is given to reviewing and incorporating the above information within the CPMS, however, consideration could be given to updating the document as part of a future condition.**

6.0 Technical Note 01 – Highways Response to Non-Statutory Consultee Comments

6.1 In July 2019, a response was provided to comments raised by third party non-statutory consultees. This chapter reviews this Technical Note to identify whether the responses are appropriate and provide a suitable response. The majority of the subjects covered within this note have been covered within our comments on the Transport Assessment (Chapter 3). Where additional information is provided in response to the Technical Note, this has been outlined within this chapter.

Pedestrian Safety and Amenity

6.2 As outlined within paragraph 3.40, improvements to the visibility splay would be required for any use of the site. Glanville's assessment indicates that either the kerb needs to be realigned as per SCP's proposals or the speed limit on Mottingham Road is reduced to 20mph, however, the straight nature of Mottingham Road may make this speed reduction difficult to achieve. It is considered that the reduction in footway width accords with national standards and will not result in a detriment to highway safety as there is significant area of public amenity outside the entrance to the library.

HGV Manoeuvres

6.3 Glanville's comments on the servicing arrangement and HGV movements into, out of and with the site are discussed within paragraphs 3.13 to 3.18. As outlined within paragraph 4.2, clarification will be required to confirm when and how often deliveries will occur within the site.

Traffic Surveys

6.4 It is agreed that the 2018 surveys provide a good comparison with the 2014 flows. It is considered unlikely that the roadworks at Grove Park Station would have significantly affected the traffic volumes over the course of the hours surveyed. Similarly, based on the dates of the surveys provided, it does not appear that they were undertaken during school holiday period for either state schools or independent schools.

6.5 Glanville has undertaken a GEH statistical assessment to compare the 2014 and 2018 flows. The GEH formula was developed by Geoffrey E Havers (GEH) to provide a method of comparing two sets of traffic volumes in manner which more accurately reflects the difference in flows than by using a simple percentage difference. It is used for traffic modelling and traffic forecasting and is requested by Transport for London when developing junction capacity models. It is considered that any GEH value of less than 5.0 provides a good match/correlation between two sets of traffic data.

6.6 The GEH formula has therefore been applied to the 2014 and 2018 traffic counts identified within Table 4.1 of Technical Note 01 and the results are outlined in Table 1 overleaf.

Table 1: GEH Comparison of Surveyed Traffic Flows

Survey Year	Weekday PM Peak			Saturday Peak		
	Southbound	Northbound	Two Way	Southbound	Northbound	Two Way
2014	831	611	1,442	670	533	1,203
2018	857	518	1,375	722	639	1,361
GEH Value	0.9	3.9	1.8	2.0	4.4	4.4

- 6.7 The above GEH values indicate that there is a good correlation between the 2014 and 2018 traffic counts which shows that the roadworks did not have an impact on the traffic flows which would adversely impact the modelling results. The Saturday peak hour shows that northbound flows have a GEH value of 4.4, but as this is less than 5, it is considered that this still provides a good correlation between the two sets of traffic surveys.

Car Parking

- 6.8 Glanville's comments on the suitability of the parking provision and the parking beat surveys are outlined within paragraphs 3.22 to 3.29 and Sections 5 and 7 of this report.

7.0 Technical Note 02 – Highways Response to Statutory Consultee Comments

7.1 In August 2019, a response was provided to comments and queries supplied by LB Bromley Highways (document JRB/18047/TN02/01). This chapter reviews this Technical Note to identify whether the responses to the comments are considered appropriate and provide a suitable response to the highway queries.

7.2 The majority of the subjects covered within this Technical Note have been covered within our comments on the Transport Assessment (Chapter 3). Where additional information is provided in response to the Technical Note, this has been outlined within this chapter.

1. New Access

7.3 It is considered that the site access proposals are appropriate and confirm that they would be provided as part of a S278 agreement.

7.4 Glanville acknowledge LB Bromley’s concerns with respect to the positioning of the give-way lines. It is agreed that the markings are an offset of the centre line and it is considered that it appears that the lines are in front of the kerb as they are located on the inside of the bend. It is therefore considered that there is the risk that drivers and cyclists following the kerb may cut across the site access in a straight line, travelling from kerb to kerb thereby increasing the potential for conflict with vehicles waiting at the give-way line, particularly if waiting vehicles encroach over the road markings. This is considered, however, to be a small risk as drivers will be on the offside of the vehicle and would therefore be more likely to be following the centre line markings rather than the kerb. Similarly, the safety auditors did not identify this as a concern.

7.5 The swept paths provided within Appendix 1 of the Technical Note shows that two articulated HGVs can safely pass each other. Whilst the proposed 6.5m carriageway has sufficient width it is acknowledged that, if two large vehicles are passing each other, the bend makes the manoeuvre relatively tight. Similarly, the swept paths assume that no vehicle departing the site will be overhanging the give way markings. It is considered, however, that two large HGVs passing each other in the immediate vicinity of the site access will be a very infrequent occurrence and the swept paths show that it is achievable for two such vehicles to pass safely. It is therefore considered that the carriageway width is considered acceptable.

7.6 It is considered that the site access shown in drawing SCP/18246/0000/002 Rev C provides a suitable visibility splay in accordance with Manual for Streets.

2. Road Safety Audit

7.7 LB Bromley identified that the concern about the sub-standard pedestrian crossing on Mottingham Road at the War Memorial roundabout should be addressed as part of the planning application.

7.8 Within the Technical Note, the applicants suggested upgrading the uncontrolled crossing on Mottingham Road at the War Memorial roundabout into a zebra crossing (see drawing number SCP/18047/SK12). This crossing would be located immediately on the exit of the roundabout and therefore it would likely result in the War Memorial becoming blocked particularly during peak hours and when students are walking to and from Eltham College as

pedestrians would have priority over vehicles. Glanville therefore consider a zebra crossing in this location is inappropriate.

7.9 It is acknowledged that a zebra crossing is provided on the Court Road arm immediately on its junction with Mottingham Road. During the site visit, it was observed that this occasionally caused queueing if a pedestrian is slow to cross. At one point the eastbound queue was observed to stretch back to the War Memorial roundabout due to a slow pedestrian, although this was also partly due to confusion as the driver had stopped to let the pedestrian to cross but the pedestrian did not realise this, thereby further extending the crossing time.

7.10 In January 2020, SCP submitted a drawing showing improvements to the existing uncontrolled crossing, which widens the pedestrian refuge island. This is shown within drawing SCP/18047/SK12 Rev A. Glanville considers that this provides a more suitable arrangement than the zebra crossing.

3. Servicing

7.11 Glanville's comments on the servicing arrangements have been provided within paragraphs 3.13 to 3.21.

4. Parking Spaces

7.12 LB Bromley's comments on the parking focused on whether sufficient parking is provided. Glanville's comments on the parking provision are discussed within paragraphs 3.22 and 3.26 and paragraphs 5.2 to 5.3.

5. Parking Stress Surveys

7.13 Glanville's comments on the parking beat survey have been provided within paragraphs 3.27 to 3.29 and it is acknowledged that SCP reduced the study area to 200m as suggested by LB Bromley. This is supported by CIHT guidance and the reduced survey still shows sufficient off-site parking to accommodate any excess parking.

6. Non-car Modes

7.14 This comment queried the pedestrian provision and assessment, in particular the sub-standard crossing at the War Memorial roundabout. Paragraph 7.8 provides Glanville's comments on the proposed zebra crossing. It is considered that the proposed improvements to the uncontrolled crossing shown in drawing SCP/18047/SK12 Rev A provides a more appropriate arrangement.

7.15 As outlined within paragraph 3.7, it is considered that the acceptable walking distances to a town centre is around 400m, although if anyone has heavy shopping then the potential for walking is significantly diminished. A 400m radius provides a significant residential walking catchment and which would potentially be quicker than using a car.

7. Roundabout Operation

7.16 This comment queried how the peak hour was derived and whether queue length surveys had been undertaken in 2018.

- 7.17 It is acknowledged that the Inspector confirmed that the ARCADY model validated well based on queue surveys undertaken in 2014. However, whilst the roundabout geometry may not have changed, it is considered that the roundabout should still have been validated based on 2018 traffic levels and queueing. Despite this, the site visit showed that the ARCADY model generally reflected the observed operation during the PM peak site visit on Thursday 18 June 2020. However, it should be noted that this was during the COVID-19 lockdown and therefore traffic flows may not have been at typical volumes but they were returning to normal levels.

8.0 Technical Note 03 – Highways Response to Councillor Cartwright

8.1 In April 2020, a response was provided to comments raised by Councillor David Cartwright (document JRB/18047/TN03/00). This followed the planning committee meeting held on 18 March 2020. This chapter reviews this Technical Note to identify whether the responses are appropriate and provide a suitable response.

1. A Delivery Vehicle will block the roundabout if it is unable to turn into the site

8.2 It is agreed that there is sufficient space for a 12m lorry to wait behind the articulated delivery vehicle. However, if another articulated vehicle is behind the delivery vehicle then it will stick out and potentially block the roundabout. This situation is considered to be an unlikely occurrence but if it does occur, it will be extremely infrequent and will only impact the roundabout for a negligible length of time.

8.3 It should be noted, however, that the 12m space provided equates to only two car lengths. If more than two cars are behind the articulated vehicle, or if a car is behind the 12m lorry then this will block the roundabout until the delivery vehicle is able to access the site. Again, however, it is considered that this would be an infrequent occurrence and vehicles would quickly disperse and therefore the impact is likely to be minimal.

8.4 **It is therefore recommended that 'Keep Clear' markings are considered to reduce the potential for an eastbound queue to block the access.**

2. Large Delivery Vehicles Manoeuvring

8.5 Glanville's comments on a delivery vehicle manoeuvring within the car park during opening hours are provided within paragraphs 3.13 to 3.18.

8.6 It is agreed that the visibility splays are based on a car driver position, measured 2.4m back from the give way line but that HGV drivers are typically sitting further forward, thereby increasing driver visibility at the site access.

3. Narrowing of the Road through the Widened Pedestrian Crossing

8.7 It is agreed that the carriageway does not narrow at the pedestrian crossing.

4. The Street Light Disappears

8.8 It is agreed that the re-positioning of the street light will be undertaken during the detailed design of the improvements and will form part of the S278 agreement that will need to be undertaken in liaison with LB Bromley.

5. The Re-alignment of the Existing Utilities

8.9 As with the street light, this is typically undertaken during the detailed design of the improvements and will form part of the S278 agreement.

6. The Effect of Increased Demand for Parking

- 8.10 Glanville's comments on off-site parking and the parking beat survey are provided within paragraphs 3.27 to 3.29.

9.0 Technical Note 04 – Assessment of Pedestrian Circulation Space Pre and Post Development

- 9.1 In May 2020, SCP submitted a Technical Note (SCP/18047/TN04) undertaking an assessment of the pedestrian circulation space outside the Library in relation to the Government’s new Covid-19 guidance. This guidance was published on May 2020 and is entitled ‘Traffic Management Act 2004: Network Management in Response to COVID-19’. Glanville’s own comments on this aspect have been provided within paragraphs 3.38 to 3.43 of this review.
- 9.2 Glanville agree that the proposals will provide a small increase pedestrian circulation space around the site and will reduce the potential of conflicts with vehicles through the consolidation of the two existing crossover access into one kerbed bellmouth access. It should also be noted that the improvement of the visibility splay at the access to national standards will also benefit pedestrians and cyclists as drivers will be able to see further and thereby will be able to see vehicles, cyclists and pedestrians from further away.
- 9.3 It is considered that the calculation of the circulation space is acceptable and that there shows a small increase in footway space as a result of the proposals. Glanville also agree that the southern side is likely to have a larger pedestrian flow due to the Lidl store than the library side.
- 9.4 **It is considered that if pedestrian flow surveys are available then a comparison could potentially be undertaken assessing the ‘Level of Service’ differences between the existing and proposed layouts.**

10.0 Travel Plan

- 10.1 As part of the planning application, a Travel Plan dated March 2019 was submitted for promoting sustainable transport (document reference CG/18047/TP02). Whilst employees are the main audience for the Travel Plan, it can also be utilised to encourage sustainable transport use amongst customers. This chapter provides an independent assessment of the Travel Plan, however, it is considered that the suitability of the Travel Plan for implementation will be up to the Travel Plan team within LB Bromley who will be monitoring the implementation and operation of the Plan.
- 10.2 It should be noted that, as with the Transport Assessment, no review of the Mayor's Transport Strategy has been included within the Travel Plan. This Strategy provides a target of 80% of all trips in London to be made by walking, cycling and public transport by 2041. It is therefore considered that this objective should form an important aspect of the Travel Plan. It is acknowledged, however, that the Travel Plan does make mention of the target of increasing cycle mode share to 5% by 2026.
- 10.3 Within the Local Highway Network section (paragraph 4.20 of the Travel Plan), no reference is made to the Controlled Parking Zone resident only parking on West Park and part of West Hallows and the parking restrictions on Court Road. It is considered important that this is acknowledged as it impacts the potential for staff to park in close vicinity of the site.
- 10.4 It is acknowledged that a comprehensive list of measures and initiatives have been provided aimed at both staff and customers.
- 10.5 It is considered that the Travel Plan meets national and local requirements by appointing a Travel Plan Coordinator, regular travel surveys encompassing both staff and customers and the provision of an initial monitoring programme. However, no initial targets have been proposed. Whilst it is acknowledged that the targets will change following the initial travel survey, it is considered that an indication of the likely modal share change would provide a useful indication as to how seriously the Travel Plan will be implemented. **It is therefore recommended that initial targets are provided.**

11.0 Summary and Recommendations

- 11.1 This report provides an independent review of the highway related assessments and documents submitted in support of the re-development of the Porcupine Public House on Mottingham Road in the LB Bromley, into a new Lidl food store.
- 11.2 The previous application was refused and rejected at an appeal as it conflicted with policies T6, T7 and T18 of the Unitary Development Plan (now superseded by the Local Plan). Following the review of this highway information, it is considered that safe access is provided for pedestrians (Policy T6) and facilities are provided to promote cycling (Policy T7). It is also considered that a safe site access is now being proposed with the provision of appropriate visibility splays (Policy T18).
- 11.3 It is considered that the proposals accord with Transport and Accessibility Policies 32, 33, 34 of the Bromley Local Plan, through the provision of pedestrian and cycle provision and the provision of a site access which accords with national visibility requirements. Similarly, it is considered that an appropriate assessment has been undertaken, however, Glanville's review has identified the following concerns:
1. Delivery vehicles may have to wait for a queue of vehicles to depart the car park, thereby impacting Mottingham Road. Whilst a larger access may be required this would adversely impacting pedestrians and cyclists. Therefore, it is considered that the site access is appropriate as the impact will be infrequent and short term.
 2. The delivery vehicle movements within the car park are relatively tight and may impact pedestrians. It is considered that delivery drivers, however, are used to delivering within car parks and tight spaces and are therefore aware of the constraints and risks and consequently the proposals are considered acceptable.
- 11.4 In addition to this, it is considered that the following recommendations should be considered and incorporated into the proposals / assessments if appropriate.

Recommendations

- a) Clarification is required as to the frequency and timings of the store deliveries. Consideration should be given to setting up a local resident's complaints procedure particularly if deliveries occur late at night, overnight or in the early morning.
- b) If LB Bromley has continued concerns about the servicing strategy, consideration could be given to undertaking deliveries when the number of customers is low or a smaller vehicle is used.
- c) Consideration could be given to providing further information to show that HGVs can turn into and out of Court Road.
- d) Consideration should be given to restricting delivery times to avoid the weight limit on Court Road, a different routing provided or smaller vehicles used.
- e) The provision of parking surveys and shopping duration times for similar sized Lidl store may provide further evidence that the parking provision is appropriate.

- f) Consideration could be given to providing 'Keep Clear' markings at the site access to reduce the potential for queueing from the War Memorial blocks the access.
- g) Information on how on-site parking will be enforced to ensure that the loading bay and pedestrian routes are not blocked, or the disabled and parent and child bays are not used inappropriately could be provided. Similarly, ensuring continued parking management may be considered to try to limit town centre parking.
- h) Consideration could be given to providing a 'Level of Service' assessment to show the impact of the reduced footway outside the library.
- i) It is considered that initial targets should be provided within the Travel Plan in accordance with national and regional guidance.



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