14 August 2024

Attention: Planning Department
London Borough of Bromley
By email

SLR Project No.: 237324

RE: London Electricity Board Depot Churchfields Road, Beckenham Transport Letter

Dear Sirs,

SLR Consulting has been instructed by Churchfields Road BR3 to provide highways and transportation advice in regard to the proposed use of the London Electricity Board Depot site located to the south of Churchfields Road in Beckenham by Mason Scaffolding.

A full application for the *"temporary (5 years) change of use from SUI Generis formed of an electricity undertaker's depot to a dual use of Class B8 (to provide a scaffolding equipment storage/distribution yard) and SUI Generis retaining the existing electricity undertaker's depot. Retrospective"* (Ref: 24/OO815/FULL2) was submitted 5 March 2024.

The application was supported by a Transport Statement (TS) letter (dated: 21 February 2024) that demonstrated that the site as a storage area for the Mason Scaffolding business, accords with the transportation policies adopted within the current Local Plan. Most notably Policy 30 and 31 which states that development should be located within a range of transport modes, and should provide car and cycle parking to cater for demand onsite.

Further to a review of the application, it is understood that London Borough of Bromley (LBB) Highways do not have any objections to the proposals from a transportation perspective. However, further to comments from third parties, the LBB Planning Officer has requested further information related to the potential effects of vehicle activity associated with the proposed use and the neighbouring recycling centre. Specifically, it has been requested that information be provided to demonstrate that traffic associated with the proposed use would not be impacted by, or unduly exacerbate, any queuing attributed to the recycling centre.

As such, this letter has been prepared to address the comments raised by the Planning Officer, drawing upon evidence submitted in support of the application, cameras operated by LBB (at the entrance to the recycling centre) and the TRICS database version 7.11.2.

Proposed Trip Generation

Having regard to the information provided within the TS, it is envisaged that the following trips will be generated by the intended end user (Mason Scaffolding). The proposed vehicle trip generation is provided at **Table 1**.

Table 1: Proposed Trip Generation

Time Period	Arrivals	Departures
07:00-08:00	5	10
16:00-17:00	10	5

On the basis of the above it is evident that the proposed development would generate 15 two-way movements between 07:00-08:00 and 15 two-way movements between 16:00-17:00 respectively. Given these hours coincide with the opening times of the adjacent recycling centre, it is accepted that there would be a degree of interaction between the existing and proposed uses served via the site access road.

However, it should be noted that it would be the arrivals that would have the greatest impact upon and equally potentially impacted by any queues on the access road. Based on the information presented above it is evident that this would be just 5 vehicles in the morning and 10 in the evening.

In practice, these movements would be imperceptible as they equate to roughly one vehicle arriving every 6 to 12 minutes on average. This is particularly evident in the morning as any activity associated with the recycling centre would be extremely limited given the vast majority of people would not be making a trip to such a facility to discard waste. It is our experience that this activity is much more likely to occur through the middle of the day, and at weekends, when it is not expected any traffic associated with the scaffolding business will be present on the site access road.

In order to demonstrate this, I have referred to the industry standard TRICS database which provides extensive survey data for a range of uses across the country. A summary of this assessment is presented below.

Trip Impact Assessment

The TRICS database was interrogated and utilised to inform the Trip Impact Assessment, provided at **Appendix A**. Based on the TRICS database and the 9 bays provided for the public at the adjacent recycling centre, it has been established the likely numbers of movements that could reasonably be expected to be generated at the times that coincide with the peak hours of activity associated with Mason Scaffolding. These are summarised at **Table 2** as follows:

Table 2: Existing Trip Generation

Time Period	Arrivals	Departures	Two-way
07:00-08:00	2	1	3
16:00-17:00	9	12	20

Based on the above it is, as to be expected, clear that there would be very little traffic movements associated with the recycling centre in the morning. Indeed, with just two arrivals, it is clear that there would not be any queues generated along the site access road that would result in access to the proposed development site being obstructed.

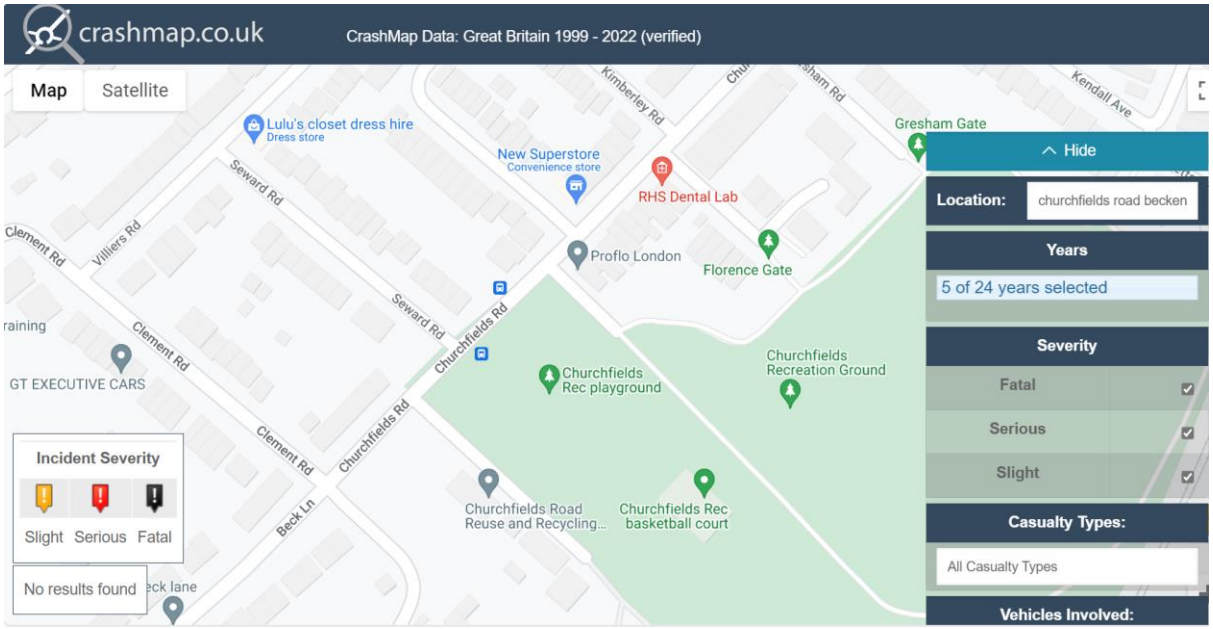
Whist there is more arrivals in the evening, these are equivalent to just one movement per recycling bay. It is therefore considered highly unlikely that any queues would form along the site access road at the time when vehicular activity with Mason Scaffolding would reach its peak.

Indeed, it should be noted that **Appendix B**, which contains screenshots obtained from the LBB operated cameras at the entrance to the recycling centre, shows there are typically no static queues with three out of the four days assessed showing a clear road. However, it is accepted that there is one day when queues, the like of which have been reported by interested parties, were observed.

It is relevant to note, the access road that runs adjacent to the Recycling centre provides a legal right of way at all times to the application site and therefore the queuing generated by

Recycling Centre that has been recorded should not be taking place. With effective management, the queuing traffic could easily be addressed through the Recycling Centre operating a booking system, like is standard practice at other such facilities, and I understand was the case here during Covid-19.

Equally, if this practice is regularly resulting in delays to the free-flow of traffic and/or introducing a road safety issue, LBB Highways could require the operator to put in place measures that would require remedial measures to be implemented. Given no such action has been taken to date to my knowledge, I can only assume that the queues recorded on the CCTV cameras are not so frequent to warrant this. In other words, it is an infrequent situation that whilst frustrating for local residents (and presumably users of the Recycling Centre) it does not lead to a poor safety record in this location, which is evidenced below in the following extract from the *Crashmap* website.



Notwithstanding this, on those rare occasions when there would be interaction between static queues linked to the Recycling Centre and vehicles returning to the site, drivers of the scaffold vehicles would be obligated by the Highway Code. Given the FORS accreditation that Masons Scaffolding has, its drivers are trained to the highest standards and there is thus no reason to suggest that the requirements of the Highway Code will not be adhered to. To this end, drivers would wait in the queue alongside those wishing to access the Recycling Centre until such a time they pass the entrance and can proceed safely into the site. As noted previously, the application site has the benefit of a right of way across the access road at all times. The current locking arrangements mean the application site can be accessed 24 hours a day, notably to facilitate the servicing and maintenance of critical electrical infrastructure for the local area.

Summary

In summary, it has been shown that:

- There would be limited interaction between development related traffic and that associated with the adjacent recycling centre in the morning, owing to the low number of movements associated with each use.
- Whilst there would be a greater chance of interaction in the evening, the low frequency of arrivals to the recycling centre and proposed development are such that they would not lead to any demonstrable harm to the free flow of traffic along the site access road.

- On those rare occasions when there is interaction with static queues on the site access road, drivers of scaffolding vehicles would be obligated to wait until they pass the entrance to the recycling centre before proceeding safely into the site.

It is therefore concluded that the proposals will not cause demonstrable harm on the local highway network, let alone the severe impact referred to in the NPPF. This is particularly evident given that the queuing that does periodically occur along the site access could readily be avoided with the operator of the Recycling Centre (i.e. LBB) voluntarily introducing a booking system to better manage its impact on the wider highway network (in line with its legal obligations to allow the owner right of way at all times access to and from its land) and/or the local highway authority (i.e. LBB) insisting such a measure be adopted.

The proposals are therefore entirely acceptable in transport terms in my professional opinion.

Your sincerely,

SLR Consulting Limited

James Bancroft
Director

Enclosures

A) Trip Impact Assessment
B) LBB Camera Screenshots

Enclosure A – Trip Impact Assessment

Churchfields Road Recycling Centre, London - Trip Impact Assesment

Existing Use Trip Generation

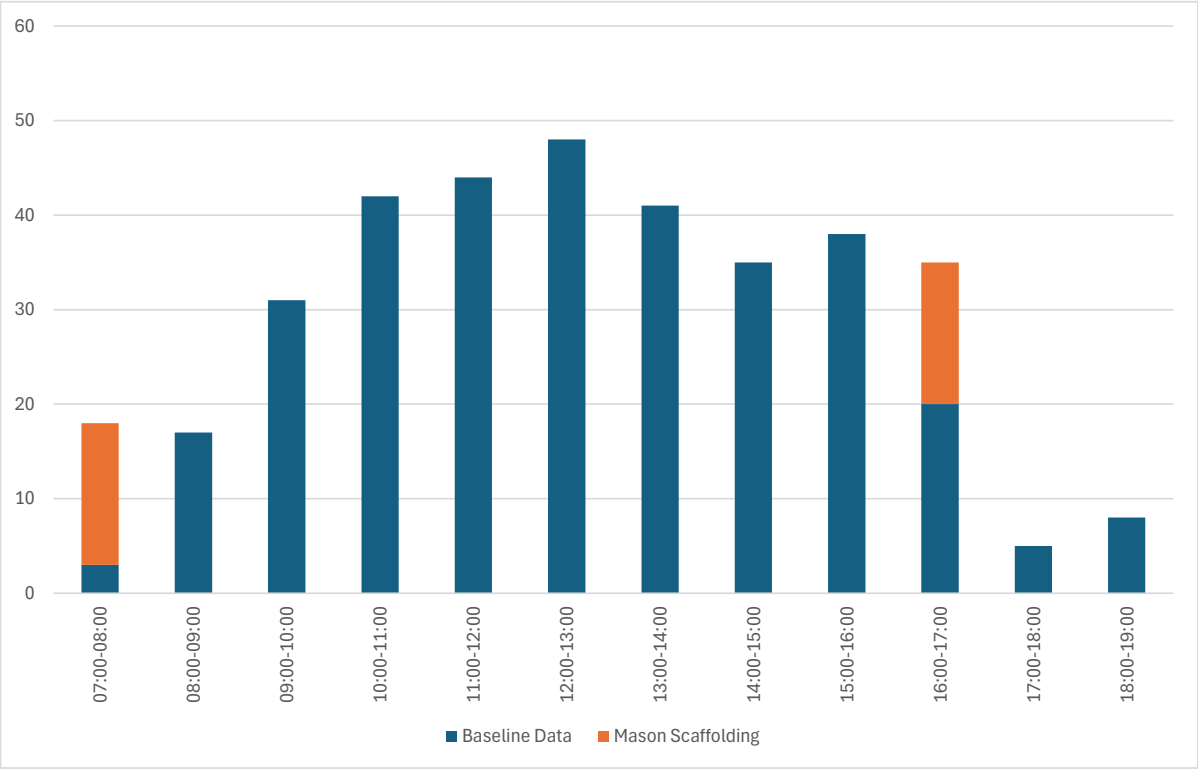
Time	Arrivals	Departures	Two-way
07:00-08:00	2	1	3
08:00-09:00	9	8	17
09:00-10:00	16	15	31
10:00-11:00	21	21	42
11:00-12:00	22	22	44
12:00-13:00	25	23	48
13:00-14:00	19	22	41
14:00-15:00	19	16	35
15:00-16:00	18	20	38
16:00-17:00	9	12	20
17:00-18:00	2	3	5
18:00-19:00	3	5	8

Based on TRICS data and 9 bays provided for the public

Proposed Use Trip Generation

Time	Arrivals	Departures	Two-way
07:00-08:00	5	10	15
08:00-09:00			
09:00-10:00			
10:00-11:00			
11:00-12:00			
12:00-13:00			
13:00-14:00			
14:00-15:00			
15:00-16:00			
16:00-17:00	10	5	15
17:00-18:00			
18:00-19:00			

Based on data provided by Mason Scaffolding



TRICS 7.11.2
Trip Rate P Total bays

TRIP RATE for Land Use 12 - CIVIC AMENITY SITES/A - CIVIC AMENITY SITE
Calculation Factor: 1 BAYS
Count Type: TOTAL VEHICLES

	ARRIVALS			DEPARTURES			TOTALS		
Time Rang	No. Days	Ave. BAYS	Trip Rate	No. Days	Ave. BAYS	Trip Rate	No. Days	Ave. BAYS	Trip Rate
00:00-01:00									
01:00-02:00									
02:00-03:00									
03:00-04:00									
04:00-05:00									
05:00-06:00									
06:00-07:00									
07:00-08:0	4	21	0.232	4	21	0.146	4	21	0.378
08:00-09:0	5	20	1	5	20	0.902	5	20	1.902
09:00-10:0	5	20	1.853	5	20	1.657	5	20	3.51
10:00-11:0	5	20	2.412	5	20	2.392	5	20	4.804
11:00-12:0	5	20	2.569	5	20	2.5	5	20	5.069
12:00-13:0	5	20	2.814	5	20	2.578	5	20	5.392
13:00-14:0	5	20	2.186	5	20	2.49	5	20	4.676
14:00-15:0	5	20	2.186	5	20	1.843	5	20	4.029
15:00-16:0	5	20	2.039	5	20	2.333	5	20	4.372
16:00-17:0	5	20	0.971	5	20	1.314	5	20	2.285
17:00-18:0	4	22	0.174	4	22	0.326	4	22	0.5
18:00-19:0	1	21	0.333	1	21	0.524	1	21	0.857
19:00-20:00									
20:00-21:00									
21:00-22:00									
22:00-23:00									
23:00-24:00									
Daily Trip Rates:			18.769			19.005			37.774

TRICS 7.11.2
Trip Rate P Total bays

TRIP RATE for Land Use 12 - CIVIC AMENITY SITES/A - CIVIC AMENITY SITE
Calculation Factor: 1 BAYS
Count Type: OGVS

	ARRIVALS			DEPARTURES			TOTALS		
Time Rang	No. Days	Ave. BAYS	Trip Rate	No. Days	Ave. BAYS	Trip Rate	No. Days	Ave. BAYS	Trip Rate
00:00-01:00									
01:00-02:00									
02:00-03:00									
03:00-04:00									
04:00-05:00									
05:00-06:00									
06:00-07:00									
07:00-08:0	4	21	0.037	4	21	0.037	4	21	0.074
08:00-09:0	5	20	0.029	5	20	0.039	5	20	0.068
09:00-10:0	5	20	0.069	5	20	0.039	5	20	0.108
10:00-11:0	5	20	0.069	5	20	0.069	5	20	0.138
11:00-12:0	5	20	0.078	5	20	0.098	5	20	0.176
12:00-13:0	5	20	0.059	5	20	0.049	5	20	0.108
13:00-14:0	5	20	0.069	5	20	0.059	5	20	0.128
14:00-15:0	5	20	0.049	5	20	0.049	5	20	0.098
15:00-16:0	5	20	0.049	5	20	0.069	5	20	0.118
16:00-17:0	5	20	0.02	5	20	0.029	5	20	0.049
17:00-18:0	4	22	0	4	22	0	4	22	0
18:00-19:0	1	21	0	1	21	0	1	21	0
19:00-20:00									
20:00-21:00									
21:00-22:00									
22:00-23:00									
23:00-24:00									
Daily Trip Rates:			0.528			0.537			1.065

TRICS 7.11.2
Trip Rate P Total bays

TRIP RATE for Land Use 12 - CIVIC AMENITY SITES/A - CIVIC AMENITY SITE
Calculation Factor: 1 BAYS
Count Type: TOTAL VEHICLES

	ARRIVALS			DEPARTURES			TOTALS		
Time Rang	No. Days	Ave. BAYS	Trip Rate	No. Days	Ave. BAYS	Trip Rate	No. Days	Ave. BAYS	Trip Rate
00:00-01:00									
01:00-02:00									
02:00-03:00									
03:00-04:00									
04:00-05:00									
05:00-06:00									
06:00-07:00									
07:00-08:0	4	21	0.195	4	21	0.109	4	21	0.304
08:00-09:0	5	20	0.971	5	20	0.863	5	20	1.834
09:00-10:0	5	20	1.784	5	20	1.618	5	20	3.402
10:00-11:0	5	20	2.343	5	20	2.323	5	20	4.666
11:00-12:0	5	20	2.491	5	20	2.402	5	20	4.893
12:00-13:0	5	20	2.755	5	20	2.529	5	20	5.284
13:00-14:0	5	20	2.117	5	20	2.431	5	20	4.548
14:00-15:0	5	20	2.137	5	20	1.794	5	20	3.931
15:00-16:0	5	20	1.99	5	20	2.264	5	20	4.254
16:00-17:0	5	20	0.951	5	20	1.285	5	20	2.236
17:00-18:0	4	22	0.174	4	22	0.326	4	22	0.5
18:00-19:0	1	21	0.333	1	21	0.524	1	21	0.857
19:00-20:00									
20:00-21:00									
21:00-22:00									
22:00-23:00									
23:00-24:00									
Daily Trip Rates:			18.769			19.005			37.774

Enclosure B – LBB Camera Screenshots

Camera Facing Churchfields Road 7th August 2024 (16:00-17:00)	
16:05 	**16:10** 
16:15 	**16:20** 
16:25 	**16:30** 

16:35  	**16:40** 
16:45  	**16:50** 
16:55  	**17:00** 

17:05

Camera Facing Churchfields Road
8th August 2024 (16:00-17:00)

16:00

16:05

16:10

16:15

16:20 	**16:25** 
16:30 	**16:35** 
16:40 	**16:45** 

16:50  	**16:55** 
17:00