



Summary of Highways Proof of Evidence

Churchfields Road BR3

Prepared by:

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SLR Project No.: 237324

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1.0 Qualifications and Experience

- 1.1 My name is James Bancroft and I am a Director at SLR Consulting, which is a Global Sustainability Consultancy. I am a member of the Chartered Institution of Highways and Transportation and have over 20 years' experience in the field of transportation planning and engineering. My experience covers transport impact assessments and accessibility appraisals, including preliminary highway design, for a range of residential, commercial, education and mixed-use developments for both private and public sector organisations across the United Kingdom (including the Capital).

2.0 Scope of Evidence

- 2.1 My evidence focuses on the transportation elements of the sole Reason for Refusal in Appeal B and the reason stated on the face of the enforcement notice in Appeal A. I have broken the evidence down into three main themes. This should be read alongside the evidence prepared by Mr Tom Lawson from Rolfe Judd Planning. I have considered these themes in the context of the National Planning Policy Framework in specific response to the Council's Statement of Case, which is focused on road safety and overall integrity of the highway network.

3.0 Theme 1 – Site Operation

- 3.1 The Council's Highways Officer has sought in the Statement of Case to cast doubt on the validity of the evidence it reviewed through the application process, which it ultimately concluded:

"...the trip attracting potential of the proposed development is not significant and will therefore not lead to a severe impact on the adjacent transport network."

- 3.2 Whilst its Statement of Case incorrectly points to perceived issues attributed to and associated with HGV activity associated with the Scaffold Yard, it is pertinent to note that the overall number of HGVs visiting the site on a regular basis (as recorded by empirical surveys) is indeed entirely consistent with that set out in support of the application (based on a first principles assessment). The significant change in opinion about the effects of the Scaffold Yard are thus unfounded and not justifiable in my opinion.
- 3.3 In any event, it is equally my professional opinion that the original conclusion reached by the Council's Highways Officer was entirely reasonable given I have shown:
- through reference to historic images that there has not been any material change to the condition of kerb lines along the shared access road, contrary to the contention of the Council it is HGVs associated with the Scaffold Yard that has caused damage to kerbs.
 - through reference to swept path analysis, and video evidence, that articulated vehicles are able to safely enter and exit the shared access road.
 - the junction the shared access road forms with Churchfields Road benefits from suitable visibility for its posted speed limit.
- 3.4 Accordingly, I am in no doubt that the Scaffold Yard can (and does) operate safely without any adverse effect on the local highway network. The Appeal is therefore entirely consistent with paragraph 115(b) of the NPPF.



4.0 Theme 2 – Highway Impact

- 4.1 The Council alleges in its SoC that the Scaffold Yard would result in increased congestion, impacting traffic flow particularly at school drop-off and pick-up times. Through reference to TomTom data, I have shown that this is categorically not the case with travel times along the full length of Churchfields Road not being subject to any material change since either the Scaffold Yard became operational and/or the introduction of a booking system at the adjacent Recycling Centre.
- 4.2 In my professional opinion, there is no justification for the suggestion that the Scaffold Yard has in any way materially affected how Churchfields Road operates on a daily basis. It certainly does not have the 'severe' effect that is referred to at paragraph 116 of the NPPF, which the Council's Highways Officer correctly concluded to be the case in its response to the application.
- 4.3 This is of course as to be expected given the traffic flows associated with the Scaffold Yard are modest at just 66 movements per day on average, with HGV movements be in the order of 20 per day. Accordingly, I am in no doubt that the operations of the Scaffold Yard are of a scale that does not represent any conflict with paragraph 116 of the NPPF.

5.0 Theme 3 – Highway Safety

- 5.1 Contrary to the conclusion reached by the Council in relation to the application, the Council's Statement of Case is predicated on the new assertion of the Highway Officer that the shared access road and the junction it forms with Churchfields Road is inherently unsafe. As noted above with respect to Theme 1, this marked change in opinion is evidently borne out of what the Council refers to variations in HGV activity.
- 5.2 Notwithstanding the fact that I have shown in my evidence that there are no fundamental differences between the levels of HGV activity that was predicted and is now occurring, I have shown through my evidence that:
- the most recently published accident records do not show any accidents having occurred at the junction the shared access road forms with Churchfields Road.
 - the design of the junction the shared access road forms with Churchfields Road is not subject to any inherent safety defects, as confirmed by an independent Stage 1 Road Safety Audit.
 - both inbound and outbound HGVs have suitable visibility to (i) exit the site access road onto Churchfields Road, and (ii) safely manoeuvre the shared site access road.
 - there is suitable visibility for drivers to see pedestrians using the walkway such that it could not be suggested that the site would exacerbate the perceived safety issue between HGVs and pedestrians.
- 5.3 Accordingly, I am firmly of the opinion that the Scaffold Yard can (and does) operate in a manner that does not conflict with the requirements of paragraph 115(b) of the NPPF.

6.0 Third Party Comments

- 6.1 A number of concerns were raised by local residents through the application determination period, and these have been supplemented by a series of videos submitted as part of the



Appeal process. The main premise of the concerns raised is that Churchfields Road and the shared access route are not suitable to accommodate the types of vehicles that the Scaffold Yard operates.

6.2 These points are covered in detail in my evidence and summarised above under the respective themes I have identified from the Council's Statement of Case and do not have any bearing on the conclusions I have made. In fact, I contend that the videos submitted by residents are helpful in so much as they show:

- Vehicles associated with the scaffolding site are shown to be accessing the site safely from both the east and west without overrunning the kerb.
- A banksman is shown managing traffic at school pick-up times to ensure the safe passage of pedestrians and other road users.
- It is clear that any disruption to the free flow of vehicles along Churchfields Road arising from large vehicles associated with the Scaffold Yard accessing the shared surface road is temporary.
- It is not just heavy vehicles associated with the Scaffold Yard that use Churchfields Road as the footage also shows buses and service vehicles associated with the Recycling Centre (including at school drop-off/pick-up time).

7.0 Mitigation

7.1 Whilst I am content that there is no substantive or justified reason to dismiss this Appeal, the Appellant is willing to (insofar as the Inspector considers necessary):

- operate a Vehicle Management Plan that would afford the Council the ability to control how vehicles associated with the Scaffold Yard use the local highway network.
- work with the Council to reposition the gates to the shared access route further south to give room for larger vehicles to wait away from Churchfield Road on those occasions when the gates need to be unlocked.
- provide improvements to the pedestrian access route, as set out in the Statement of Common Ground.

8.0 Conclusion

8.1 On the basis of my evidence, I am of the professional opinion that the Appeal Scheme fully accords with all relevant policy and therefore should not be resisted or refused on highways or transport grounds. I am of the professional opinion that the Appeal Scheme fully accords with the NPPF and therefore should not be resisted or refused on highways or transport grounds.

8.2 This is of course as to be expected given the Council's Highways Team did not object to the application. The premise that the change in movements from what was presented for the planning application to that which is now taking place is not justified, particularly as the HGV activity is in line with that the Council concluded would:

- Not be significant; and
- Not lead to a severe impact on the transport network.





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