

21 February 2024

Attention: Planning Department London Borough of Bromley **By email** 

SLR Project No.: 237324

London Electricity Board Depot Churchfields Road, Beckenham Transport Statement

I am instructed by *Churchfields Road BR3* to provide highways and transportation advice with respect to the proposed use of the London Electricity Board Depot site located to the south of Churchfields Road in Beckenham by Mason Scaffolding. A site location plan is provided below for reference:

As you will be aware, the lawful use of the site is established by 92/00337/FUL electricity undertaker's depot and vehicle service repair and mot testing station falling within B2 / B8 as a non-designated industrial site. It is understood that the vehicle service and repair and MOT Testing Station element of the consent has now ceased on site.

However, the fundamental use of the space as an electricity undertaker's depot has continued in perpetuity since the 1992 consent through the presence of large substations on site, which are live to this date, and regularly serviced and maintained. On this basis it is considered that this consent is the extant approval for the site and has not been abandoned.

This is an important point as the use of the site by Mason Scaffolding as a storage yard falls within the wider definition of non-designated industrial site (as well as falling withing B2/B8 Use Classes). To this end, the use of the site for this purpose is in accordance with the 1992 consent. Notwithstanding this, this Transport Statement letter, which has due regard to current industry best standard practices, has been prepared to evaluate how the use of the site as a storage area for the Mason Scaffolding business accords with the transportation policies of the current adopted Local Plan.

For the purposes of this letter, reference has been made to the headings outlined in Chapter 3 of the Department for Transport's *Guidance on Transport Assessments* (GTA) document. Whilst this has been archived by the DfT it is understood that Transport for London (TfL) still refer to this when identifying the thresholds of assessment and thus reference to the headings identified for Transport Statements in the GTA is a reasonable approach to take.

### **Existing Conditions**

The site, which is located to the south of Churchfields Road Recycling Centre, covers a total area of approx. 1.4 hectares. Save for several electricity pylons, the site is undeveloped and does not benefit from any formal parking facilities. The ground is made however, with hardstanding provided across the site.

Access to the site is achieved via an access track that is shared with the adjacent Recycling Centre, which is approx. 6 metres wide. It forms a junction with Churchfields Road to the north, and benefits from a pedestrian footway along the majority of its length, albeit is accepted



that it does not extend into the site itself. There are thermoplastic speed humps provided to help control vehicle speeds.

Churchfields Road benefits from footways on either side of its carriageway, which provide connections to the wider pedestrian infrastructure that serves the area and provides onward connections to the wider transport networks. It is also worthy to note that Churchfields Road forms part of the Bromley Cycle Map, and in particular the Bromley Section of National Cycle Route 21 (see Cycle Map Enclosure). In this regard, it is considered that the site is well located to encourage active modes in accordance with Policy 31 of the Bromley Local Plan.

In line with the average of 2.7 withing the Bromley Local Plan, that the site has a Public Transport Accessibility Level (PTAL) rating of 2/3. In this regard, the accessibility of the site to bus and rail services is considered to be typical of Bromley.

However, it should be noted that the PTAL rating is considered to be a relatively crude measure of accessibility. In this location, it should be noted that a total of 12 tram services and 6 buses operate per hour from the nearby Avenue Road tram stop and the bus stops immediately adjacent to the junction the site access forms with Churchfields Road. Frequencies of this magnitude are considered to be representative of a turn up and go service, meaning use of public transport is both encouraged and facilitated. Moreover, the TfL Travel Time calculator tool that demonstrates a large area of the Capital is accessible within 60 minutes.

To this end, it is considered the site is well located to encourage trips to be completed by public transport. This is reinforced by Census data for the local area showing some 30% of journeys to this part of Bromley for work purposes are completed by bus and rail. Full details are provided on the Public Transport Access enclosure.

From a road safety perspective, information available on the Crahsmap website indicates that no personal injury accidents (PIA) have been recorded at the junction the site access forms with Churchfields Road. Equally no PIA have been recorded within 200 metres of the site access (see 'Road Safety' enclosure for details). This is noteworthy as it shows that the section of the adjacent highway network that will be the focus of all transport activity associated with the site, is not subject to a poor safety record that would indicate there are defects associated with the design that contribute towards an unsafe environment for road users.

Owing to the site being largely undeveloped, and the nature of the lawful use, the site is considered only likely to generate occasional vehicle trips. For the purposes of this assessment, it is therefore considered a reasonable worst case scenario to assume that the site will not generate any traffic.

In summary, the site:

- is located in an area where the use of all modes of transport if both facilitated and encouraged in line with Bromley Local Plan Policy 31.
- is served by a road network that is not subject to a poor safety record in line with Bromley Local Plan Policy 32.
- is, for the purposes of this assessment, assumed not to generate any vehicular traffic on a regular basis. This allows for a worst case assessment of the likely effects of the Mason Scaffolding business.



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### **Mason Scaffolding Storage Yard**

Churchfields Road BR3 is not proposing any changes to the current site. To this end, the only change to the current situation is the potential effects that the use of the site for storage of scaffolding equipment could have from a trip attraction perspective.

In order to predict this, consideration was first given to the industry standard TRICS database. However, as this database does not include any details for similar such uses it has been necessary to predict trips based on a first principles methodology that takes into account the number of people that are expected to be employed by Mason Scaffolding and the typical daily profile of activities that will originate from the site. The following text outlines the trip attracting potential of both staff and operational movements.

From a staff perspective, it is expected that a total of 7 people will be employed on the site, with working hours being approx. 06:00-16:00. It is equally expected that a total of [add] people will be employed to install scaffolding off-site. The off-site staff will arrive at the site before the start of their working day (i.e. 07:00) and leave after 16:00 once the off-site operational activity attributed to the scaffolding works are completed. Having regard to Census data for the local area, it is considered reasonable to assume that the following daily trips will be generated:

| Mode of Travel                | Share | On-Site Staff | Off-Site Staff | Total |  |
|-------------------------------|-------|---------------|----------------|-------|--|
| Underground, tram, light rail | 7%    | 0             | 1              | 1     |  |
| Train                         | 13%   | 1             | 1              | 2     |  |
| Bus                           | 10%   | 1             | 1              | 2     |  |
| Taxi                          | 0%    | 0             | 0              | 0     |  |
| Motorcycle                    | 1%    | 0             | 0              | 0     |  |
| Car driver                    | 54%   | 4             | 5              | 9     |  |
| Car passenger                 | 2%    | 0             | 0              | 0     |  |
| Bicycle                       | 2%    | 0             | 0              | 0     |  |
| Pedestrian                    | 10%   | 1             | 1              | 2     |  |
| Other                         | 1%    | 0             | 0              | 0     |  |
| Total                         | 100%  | 7             | 10             | 17    |  |

Mason Scaffolding has confirmed it will operate 10 vehicles from the site. Mason Scaffolding has equally confirmed that each vehicle typically works on one job per day. However, it is not uncommon for vehicles to remain on site all day. To this end, the maximum worst case number of daily operational vehicle movements attributed to its business are expected to be 20 (i.e. 10 departures in the morning and 10 arrivals in the evening).

Activity of this magnitude is such that there would be a negligible overall effect on the adjacent transport networks. This is particularly evident given the activity will take place outside of the traditional morning and evening peak travel periods of 08:00-09:00 and 17:00-18:00.

To this end, the use of the site by Mason Scaffolding would not result in the 'severe' impact that is referred to at paragraph 115 of the NPPF. The increase in activity would equally not be of a magnitude that would lead to a road safety issue, particularly as the types of vehicles



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used by Mason Scaffolding are able to enter and exit the site access junction in a forward gear, as shown on the enclosed tracking drawings.

It should also be noted that at some 1.4 hectares, the site benefits from sufficient hard standing to safely accommodate all expected staff vehicles and operational fleet vehicles at the same time. Accordingly, and whilst these will not be marked out formally, there will not be any overspill of staff or operational parking onto surrounding roads. Equally, sufficient space is provided for cycles to be parked safely on site thereby encouraging the use of this mode of transport.

#### **Summary**

In summary, it has been shown:

- that the site is well located to a range of transport modes, and as such is consistent with Bromley Local Plan Policy 31.
- the current site access design is suitable to meet the needs of the road users that are expected to travel to the site in accordance with planning policy.
- the proposed development accords with Bromley Local Plan Policy 30 given:
  - demand for car parking can be met on-site.
  - demand for cycle parking can be met on site.
- the trip attracting potential of the Mason Scaffolding business is negligible and will therefore not lead to a severe impact on the adjacent transport network, and as such is consistent with Bromley Local Plan Policy 31.

I therefore conclude the use of the London Electricity Board Depot site by Mason Scaffolding is entirely acceptable from a highways and transportation grounds, particularly given the business activity associated with Mason Scaffolding falls within the current provisions of the 1992 consent.

Yours sincerely,

**SLR Consulting Limited** 

James Bancroft
Director



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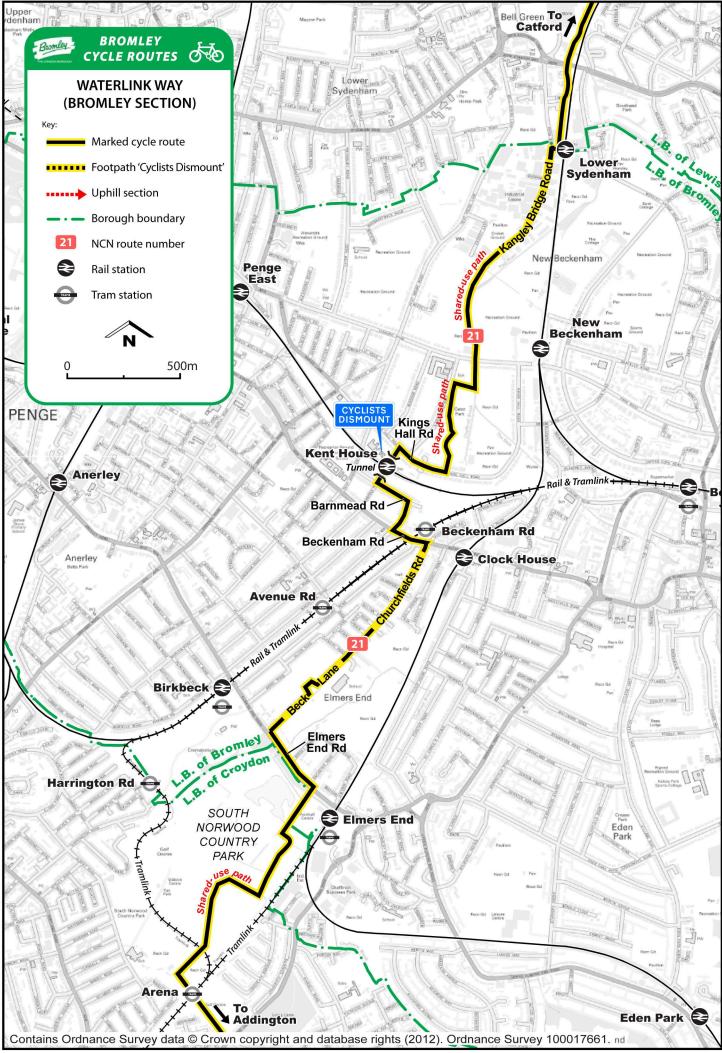
#### **Enclosures**

- 1. Cycle Map
- 2. Public Transport Access
- 3. Road Safety
- 4. Swept Path Analysis



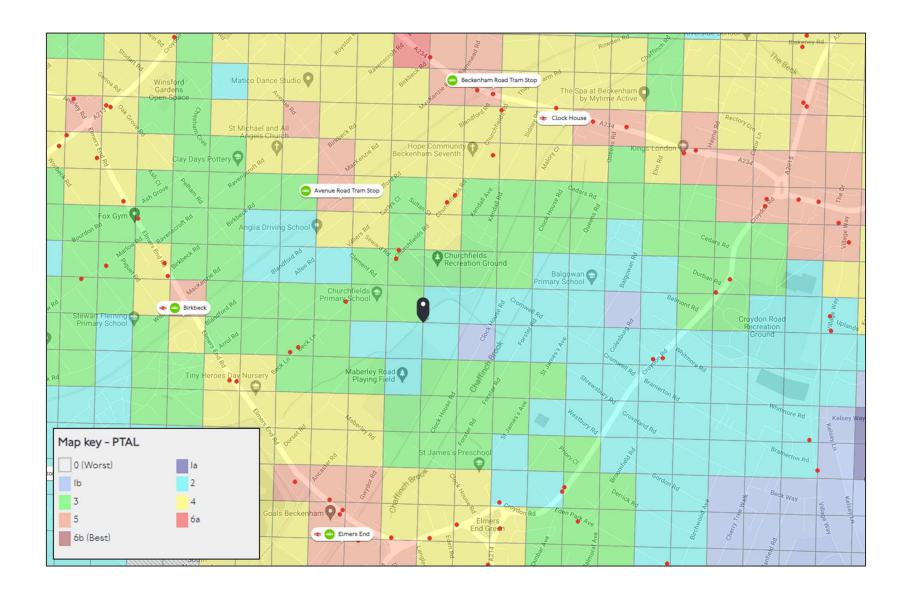
# Enclosure 1 – Cycle Map





## **Enclosure 2 – Public Transport Access**





#### WebCAT PTAL Report

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Site Details

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Grid Cell: 28385 Easting: 536045 Northing: 168952

Report Date: 21/02/2024 Scenario: Base Year

#### **Calculation Parameters**

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Day of Week: M-F

Time Period: AM Peak Walk Speed: 4.8 kph

Bus Node Max Walk Access Time (mins): 8

Bus Reliability Factor: 2.0

LU Station Max Walk Access Time (mins): 12

LU Reliability Factor: 0.75

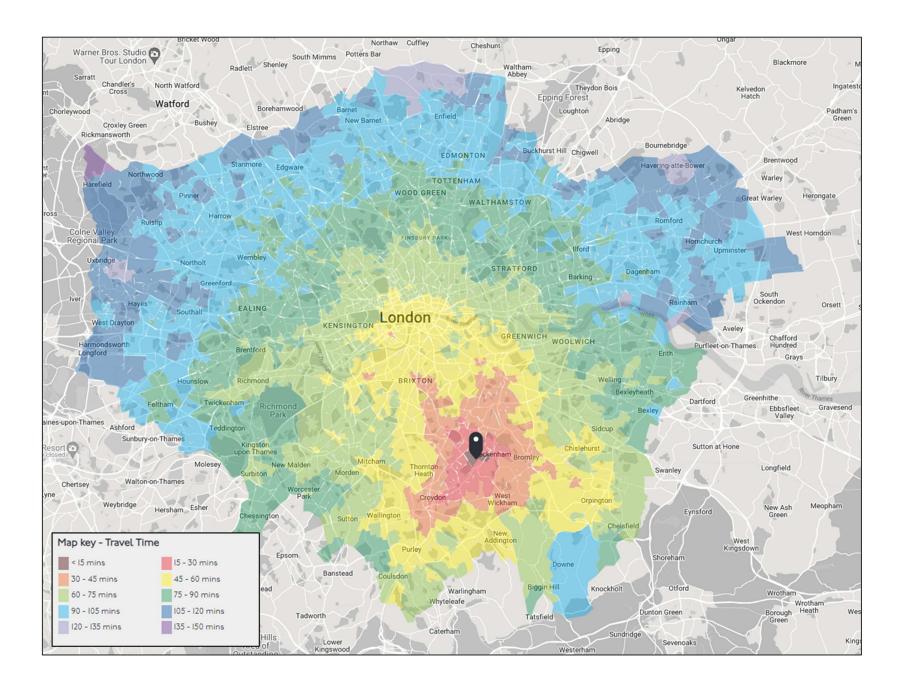
National Rail Station Max Walk Access Time (mins): 12

National Rail Reliability Factor: 0.75

|      | Stop Route<br>TAT (mins) | ,            | ,         | Freque | ency (vp | oh)  | Walk T | ime (mi | ins)  | SWT  |
|------|--------------------------|--------------|-----------|--------|----------|------|--------|---------|-------|------|
| Bus  | BECK LANE C<br>0.5 0.94  | LEMENT ROA   | <b>ND</b> | 354    | 319.55   | 3    | 3.99   | 12      | 15.99 | 1.88 |
| Bus  | Avenue Road 2.15         | Fram Stop    | T2        | 558.65 | 6        | 6.98 | 7      | 13.98   | 2.15  | 1    |
| Tram | Avenue Road<br>1 2.2     | 'BeckJn-Beck | Jn via W  | VC'    | 631.76   | 6    | 7.9    | 5.75    | 13.65 | 2.2  |

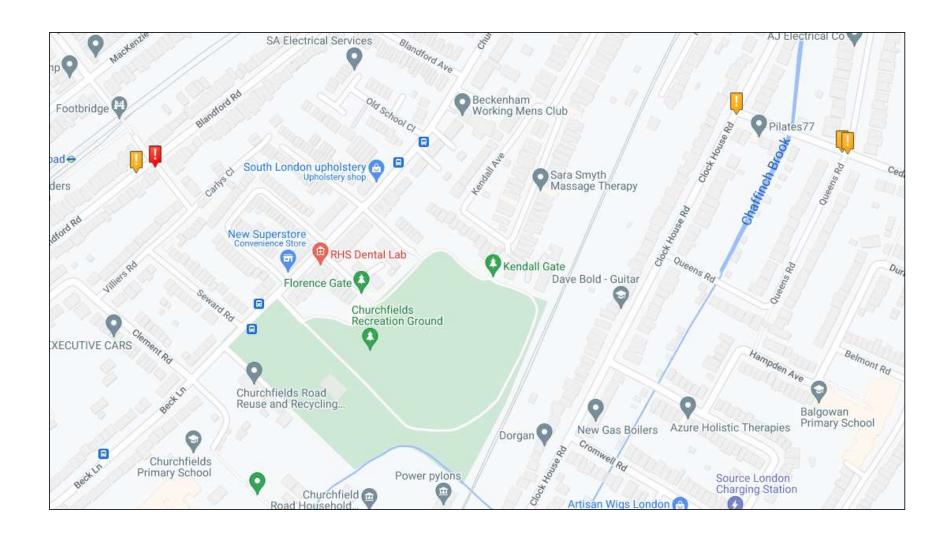
Total Grid Cell AI: 5.28

PTAL: 2



## Enclosure 3 – Road Safety





## **Enclosure 4 – Swept Path Analysis**



