

# 26 HILLBROW ROAD

## APPEAL TECHNICAL NOTE



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# 1. 26 HILLBROW ROAD, LB LEWISHAM

## 1.1 Introduction

- 1.1.1 SYSTRA Ltd (SYSTRA) has been commissioned by Stellar Hillbrow Ltd (the Client) to provide transport and highways advice in support of a planning application for the proposed redevelopment of 26 Hillbrow Road, Bromley, BR1 4JL (the Site), located within the London Borough of Lewisham (LBL).
- 1.1.2 The Site is bound by residential properties to the north and south, Hillbrow Road to the east and residential properties fronting Calmont Road and Belgravia Gardens to the west.
- 1.1.3 It is noted that, whilst the Site is located within the London Borough of Lewisham, Hillbrow Road acts as the boundary with the London Borough of Bromley (LBB), with properties on the opposite side of the carriageway located in LBB.

## 1.2 Planning History & Development Proposals

- 1.2.1 A planning application has been submitted (ref: DC/19/112020) for the demolition of the existing residential three-bed dwelling and associated garage and construction of six residential units (4x one-bed, 1x two-bed and 1x three-bed), to be supported by two car parking spaces in the form of a double garage (the Proposed Development). Access would continue to be taken via the existing vehicular access off Hillbrow Road.
- 1.2.2 Planning permission was refused by LBL in May 2020 for three key reasons:
- Condition and suitability of Hillbrow Road to accommodate movement associated with the Proposed Development;
  - Lack of step-free access into the Proposed Development; and
  - Unacceptable overlooking to 28 Hillbrow Road from the first floor balcony associated with Unit 5.

## 1.3 Technical Note Scope

- 1.3.1 This Technical Note has been prepared to provide a rebuttal to the transport-related reason for refusal. It sets out a detailed response to comments provided within the Officer Report for Refusal. It should be read in conjunction with the Transport Statement (dated 01 April 2019) and subsequent Technical Note (dated 17 September 2019) prepared by SYSTRA in support of the planning application.
- 1.3.2 For clarity, the condition for which this Technical Note has been prepared is set out below.

*1. The proposed development would fail to ensure a safe and convenient route for pedestrians to the application site that would be accessible to all users, resulting in potential conflict with vehicle manoeuvring that would significantly further exacerbate existing prejudicial conditions to highway safety on Hillbrow Road, contrary to Paragraphs 108 and 109 of The National Planning Policy Framework (2019), Policy 7.2 An Inclusive Environment of The London Plan (2016), Policy 14: Sustainable Movement & Transport of the Core Strategy (2011) and DM32: Housing*

*design layout and space standards, DM33: Development on infill sites, backland sites, back gardens and amenity areas of the Development Management Local Plan (2014).*

1.3.3 It collates comments and issues raised by topic, and addresses these in turn below:

- Carriageway Surface;
- Pedestrian Movement & Safety;
- Parking;
- Public Transport Accessibility; and
- Development Precedence.

## 1.4 Carriageway Surface

1.4.1 Concerns have been raised regarding the surface of Hillbrow Road.

### **LBL Comments:**

*“The existing condition of Hillbrow Road is poor, and there is currently an unsafe environment for pedestrians, as there are no pavements” (Paragraph 67)*

*“Hillbrow Road doesn’t provide a safe or attractive environment for pedestrians, and the quality of the pedestrian environment is very poor” (Paragraph 67(1))*

1.4.2 It is recognised that Hillbrow Road is an unadopted unsurfaced road and, in places, is subject to a poor state of repair. However, there are a number of streets within the vicinity of Hillbrow Road of a similar condition, whereby the carriageway is unsurfaced and footways are either not provided or only provided for a portion of the road. These roads all accommodate residential development and include:

- Beckenham Place Park;
- Coniston Road, to the south of the junction with Elstree Hill (shown in **Figure 1**);
- Elstree Hill (shown in **Figure 2**);
- Erin Close;
- Kirkstone Way (shown in **Figure 3**);
- Madeira Avenue, to the east of the junction with Elstree Hill (shown in **Figure 4**);
- The Avenue, between its junctions with Westgate Road and Downs Hill;
- The Knoll; and
- Westgate Road, to the north of the junction with Westgate Road.

1.4.3 Notably, St Mary’s Catholic Primary School is located on the unsurfaced section of Westgate Road, an approximate 1.5km walk distance from the Site.

1.4.4 It should therefore be recognised that the principle of residential units located on roads that are unsurfaced and do not provide footways has been accepted.



**Figure 1. Coniston Road Unsurfaced Carriageway**



**Figure 2. Elstree Hill Unsurfaced Carriageway**





Figure 3. Kirkstone Way Unsurfaced Carriageway



Figure 4. Madeira Avenue Unsurfaced Carriageway



## 1.5 Pedestrian & Cycle Movement & Safety

- 1.5.1 A number of concerns are raised by LBL relating to pedestrian and cycle accessibility, movement and safety on Hillbrow Road. These are summarised and addressed in turn below.

### Pedestrian Movement

#### LBL Comments:

*"The site of the proposed development is not considered to be easily or safely accessible by foot ... because a safe and suitable access to the site for all users would not be provided, and the impacts on highway safety due to the proposed development would not be acceptable" (Paragraph 75)*

*"Hillbrow Road isn't in a suitable condition to accommodate the pedestrian and cycle movements/trips associated with the proposed residential development and is therefore likely to lead to a high level of car dependency contrary to Core Strategy Policy 14, and various London Plan, and NPPF policies that encourage and promote sustainable transport modes" (Paragraph 83)*

*"However significant planning harm has been identified in terms of the access to the site via Hillbrow Road, which isn't in a suitable condition to accommodate the pedestrian and cycle movements associated with the proposed residential development" (Paragraph 162)*

- 1.5.2 Hillbrow Road is predominantly residential in nature and provides vehicular and pedestrian access to a number of residential units on both Hillbrow Road and Tresco Close. It provides a shared pedestrian, cyclist and vehicle route. Whilst no footways are provided on either side of the carriageway, it is noted that grass verges are located on portions of the eastern side of the road that could be used by pedestrians.
- 1.5.3 There are a number of residential properties provided on both sides of Hillbrow Road. These include two recently completed flatted development. It is not unexpected that these properties generate trips by sustainable modes.
- 1.5.4 To confirm that pedestrian activity occurs without issue on Hillbrow Road, SYSTRA undertook a pedestrian / vehicle count on Hillbrow Road on Tuesday 9 June 2020. In addition, informal observations were recorded on the neighbouring Elstree Hill and Madeira Avenue (which are of a similar unsurfaced condition with no footways provided).
- 1.5.5 In light of an increase in home working and travel restrictions associated with COVID-19, the survey was undertaken during the lunch period as opposed to standard network peak hours, when residents would usually be expected to walk to Ravensbourne Station or nearby bus stops.
- 1.5.6 Between the hours of 13:15 and 13:45, a total of seven pedestrians were recorded on Hillbrow Road, including a parent and two young children, as shown in [Figure 5](#). Pedestrians were recorded walking in both a northbound and southbound direction during the survey period.



**Figure 5. Pedestrian Activity, Hillbrow Road**



- 1.5.7 During the same time period, only one vehicle was recorded on Hillbrow Road, a delivery van travelling in a southbound direction. The vehicle travelled at slow speeds of approximately 5 to 10mph.

**Figure 6. Pedestrian Activity, Hillbrow Road**



- 1.5.8 The survey has demonstrated that pedestrian movement and activity is currently safely accommodated on Hillbrow Road without issue and that the condition of Hillbrow Road is suitable to accommodate pedestrian movements including trips associated with the Proposed Development. The level of trips that will be generated by the Proposed Development's uplift of five residential units would not be expected to increase pedestrian trips to such a level that would result in significant impacts to pedestrian





movement. Concerns raised by LBL relating to road user safety are addressed later within this Technical Note.

- 1.5.9 In addition, pedestrian movements were recorded both on Elstree Hill and Madeira Avenue, as shown in **Figures 7 and 8**. Both roads are located approximately 100m to the east of Hillbrow Road. Elstree Hill connects to Coniston Road at its northern end and Calmont Road at its southern end.

**Figure 7. Pedestrian Activity, Elstree Hill**



**Figure 8. Pedestrian Activity, Madeira Avenue**



- 1.5.10 Whilst no cycle movements were recorded on Hillbrow Road, it is noted that a cyclist was recorded on The Knoll during the site audit, shown in **Figure 9**. The Knoll, located in LB Bromley, is unsurfaced and does not provide footways for pedestrians. It is considered to represent similar conditions to Hillbrow Road, and suggests that the condition of Hillbrow Road would not be prejudicial to cycle movements taking place.





Figure 9. Cycle Activity, The Knoll



## Road Safety

### LBL Comments:

*“An intensification in use of Hillbrow Road by introducing additional residential units on the site would result in an increase in conflict between the different Road users of Hillbrow Road which would unacceptably increase safety implications, and reduce the already poor level of accessibility of Hillbrow Road, particularly given the poor condition of the road and the lack of footways” (Paragraph 73)*

*“This would result in potential conflict with vehicle manoeuvring that would significantly exacerbate existing accessibility and highway safety issues on Hillbrow Road” (Paragraph 96)*

*“The proposed development is therefore recommended for refusal, due to the significant harm identified in terms of highway safety” (Paragraph 163)*

*“... resulting in potential conflict with vehicle manoeuvring that would significantly further exacerbate existing prejudicial conditions to highway safety on Hillbrow Road” (Reason for Refusal 1)*

*“The speed limit of Hillbrow Road is 30mph” (Paragraph 67(1))*

- 1.5.11 The lack of footways on Hillbrow Road is not considered to be uncommon for roads of this nature. On-site observations have identified low levels of vehicle movements, with such movements expected to almost exclusively relate to access to and from residential properties fronting Hillbrow Road.
- 1.5.12 Whilst LBL notes the speed limit of Hillbrow Road to be 30mph, actual vehicle speeds are considerably lower, due to the unsurfaced nature of the carriageway. An advisory speed restriction of 5mph is signed on the road, as shown in [Figure 10](#). It is considered that

suggestions that vehicles would travel at 30mph on Hillbrow Road are considered unsubstantiated.

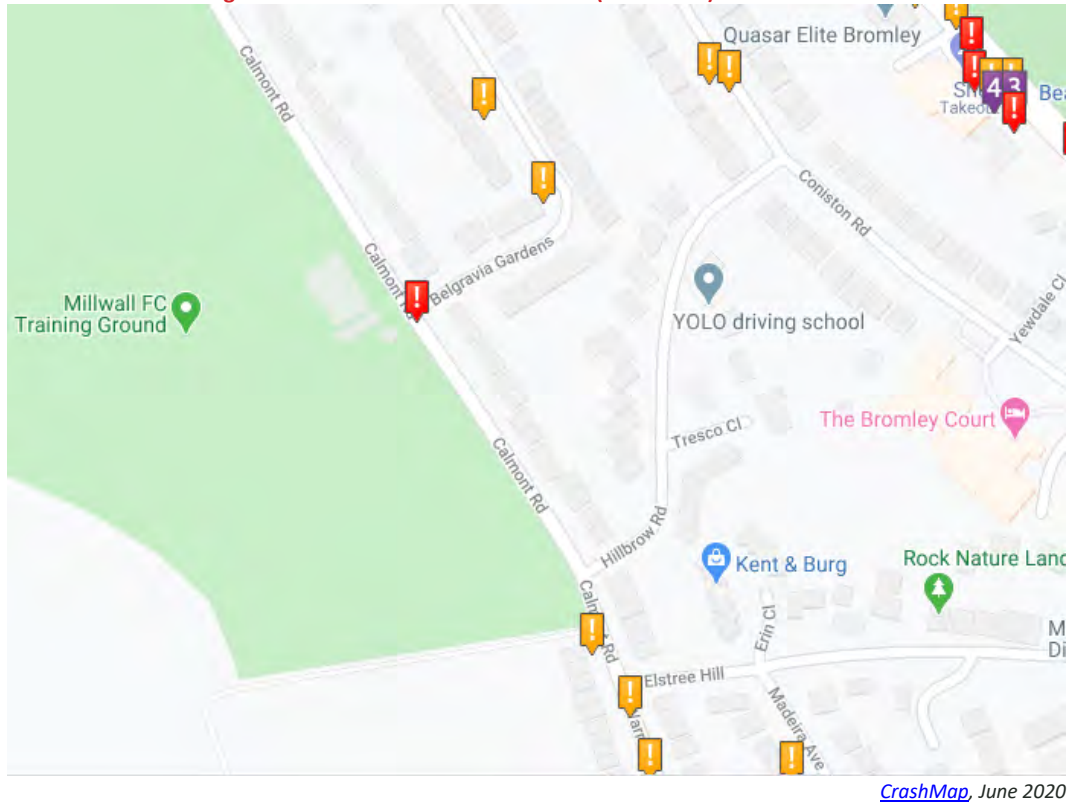
**Figure 10. Speed Restriction, Hillbrow Road**



- 1.5.13 The surface of the road encourages vehicle drivers to travel at lower speeds than on tarmac-surfaced roads, which in part, acts as a natural traffic calming measure. This helps to reduce potential conflict with other road users and enable vehicles, pedestrians and cyclists to safely use Hillbrow Road. Furthermore, the low vehicle speeds contribute to a more pleasant environment for non-motorised road users.
- 1.5.14 A review of collision data for the latest available five year period is set out within the Transport Statement (obtained via CrashMap). No accidents have been recorded on Hillbrow Road, or at its junctions with Calmont Road and Coniston Road over the past five year period.
- 1.5.15 SYSTRA has undertaken a further review covering a greater time period and all years for which data is available. As shown in **Figure 11**, this has confirmed that, between 1999 and 2019, no road collisions have been recorded on Hillbrow Road, or at its junctions with Coniston Road and Calmont Road.
- 1.5.16 It is therefore considered that there is no evidence to suggest there are existing highway safety issues on Hillbrow Road and that the road currently operates in safe manner. There are no material existing road safety issues that would be exacerbated as a result of the trips forecast to be generated by the Proposed Development (as set out in **Section 1.6** of this Technical Note and **Section 5** of the Transport Assessment). These trips would not result in conflict between different road users that would result in unacceptable implications to safety.



**Figure 11. Road Collision Data (1999-2019)**



## Road Width

### LBL Comments:

*“Sections of Hillbrow Road aren’t wide enough to allow two cars to pass each other, so two cars approaching on Hillbrow Road to access/egress the site would result in vehicles undertaking reversing movements which would have highway safety implications, particularly for pedestrians and vulnerable road users” (Paragraph 71)*

*“Meaning 2-way vehicle flow is not possible along large sections of street” (Paragraph 67)*

- 1.5.17 As noted within the Transport Statement, the width of Hillbrow Road ranges between 2.8m and 7.8m, with passing points provided to enable the two-way flow of traffic. Such passing points mean it is not expected that vehicles would be required to reverse on Hillbrow Road. Furthermore, the residential nature of the road means it is subject to low vehicular flows; as such, it is unlikely that multiple instances would occur of two vehicles passing each other.
- 1.5.18 The vehicular access to the Proposed Development is 6.6m in width, allowing two cars to pass simultaneously in accordance with the requirements of Manual for Streets (MfS). The development incorporates the provision of two parking spaces. This level of provision means it is unlikely two vehicles will be accessing / egressing from the Site at the same time. Notwithstanding this, should two vehicles be accessing / egressing simultaneously, there would not be a need for vehicles to undertake reversing manoeuvres.

- 1.5.19 Outside the Site, Hillbrow Road is of a sufficient width to accommodate two-way vehicle movement, including when a vehicle is parked, as shown in **Figure 12**.

**Figure 12. Hillbrow Road Outside Site**



## 1.6 Parking

- 1.6.1 A number of concerns are raised in the Full Decision Report regarding parking on Hillbrow Road, and the impact additional parking demand generated by the Proposed Development would have on pedestrian movement and safety. These concerns are summarised below:

### LBL Comments

*"There is unrestricted, ad-hoc parking along both sides of the street. ... Because there isn't any formal delineation on the carriageway, parking occurs on Hillbrow Road in an unmanaged way. ... The informal ad-hoc parking has an impact on pedestrian movement along Hillbrow Road" (Paragraphs 17 & 70)*

*"The existing levels of unrestricted ad-hoc parking is a barrier to pedestrian movement, and any increase in this would unacceptably decrease the level of accessibility, as well as safety for all road users, but particularly pedestrians" (Paragraph 95f)*

*"... the development would exacerbate existing accessibility and safety issues for Hillbrow Road residents, due to an increase in ad-hoc parking on the road, and an increase in vehicle movements" (Paragraph 75)*

- 1.6.2 A response to these concerns is set out below.





## Hillbrow Road Parking

- 1.6.3 It is recognised that on-street parking occurs on Hillbrow Road, and no formal restrictions operate due to the unadopted nature of the road. Parking is not formalised as a result of no carriageway markings or delineations.
- 1.6.4 Whilst parking is unrestricted, it is noted that a number of 'No Parking' signs have been installed in front of properties on Hillbrow Road, as shown in Figures 5 and 6. It is understood that these are successful in limiting amounts of on-street parking. During a site audit undertaken by SYSTRA on Tuesday 9 June 2020, a total of nine vehicles were parked on-street on Hillbrow Road. Such levels of parking are not considered to impact upon pedestrian movement or safety.

Figure 13. Parking Restriction Signage



Figure 14. Parking Restriction Signage



## Proposed Development Parking Demand & Impact

### Parking Demand

- 1.6.5 As previously detailed, the Proposed Development incorporates one house and five self-contained flats. Local-level car ownership data from the 2011 Census has been interrogated in order to ascertain forecast car parking demand to be generated by the Proposed Development.
- 1.6.6 The ward in which the Site is located (Downham) has an average car ownership level of 0.74 cars per household. This is higher than the average across LBL of 0.66, but considerably lower than the average across the neighbouring LBB (1.18). However, it is important to note that this figure does not account for differences in car ownership between houses and flats / apartments. As such, car ownership data split by unit type has been interrogated, as set out in [Table 1](#).

**Table 1. Car Ownership by Unit Type: Flats / Apartments**

NO. CARS	NUMBER OF FLATS		PROPOSED DEVELOPMENT		NUMBER OF HOUSES		PROPOSED DEVELOPMENT	
	#	%	UNITS	CARS	#	%	UNITS	CARS
None	858	62%	3	0	1,763	38%	0	0
One	474	34%	2	2	2,114	45%	1	1
Two +	58	4%	0	0	794	17%	0	0
Total	1,390	100%	5	2	4,671	100%	1	1

- 1.6.7 It can be seen that based on ward-level Census data, one third of flats (34%) are anticipated to own one car, with 62% not owning a vehicle. This equates to three of the Proposed Development's five flats not owning an vehicle, and two units owning one vehicle each. No units are forecast to own two or more vehicles. The one house is anticipated to own one vehicle.
- 1.6.8 The resultant parking demand anticipated to be generated by the Proposed Development is for three vehicles.

### Parking Impact

- 1.6.9 The Proposed Development incorporates the provision of two car parking spaces in the form of a double garage. Therefore, on-street parking demand for one vehicle is anticipated to be generated.
- 1.6.10 A snapshot parking beat survey was undertaken by an independent survey company, Nationwide Data Collection, in the vicinity of the Site on Wednesday 20 March and Thursday 21 March 2019. The survey was undertaken following the Lambeth Methodology, recognised as the standard methodology for undertaking on-street parking beat surveys. The survey recorded on-street parking capacity and occupancy within a 200m radius of the Site. Full results of the survey are contained within the Transport Statement submitted in support of the planning application.



- 1.6.11 Survey times were chosen to reflect periods when residential parking demand is likely to be at its peak. In order to provide an accurate picture of parking occupancy levels, the survey was undertaken on two neutral weekdays avoiding school holidays and dates with a major event occurring locally that could impact upon the survey results.
- 1.6.12 The survey identified parking capacity for a total of 241 vehicles within a 200m radius of the Site. This included capacity for 59 vehicles on Hillbrow Road, representing 24% of total capacity. A summary of the parking survey results is set out in [Table 2](#).

**Table 2. Parking Survey Results Summary**

ROAD	CAPACITY	DAY 1		DAY 2	
		PARKED	% OCCUPANCY	PARKED	% OCCUPANCY
Calmont Road	60	15	25%	16	27%
Hillbrow Road	59	8	14%	10	17%
Tresco Close	10	3	30%	3	30%
Coniston Road	55	28	51%	27	49%
Elstree Hill	24	0	0%	0	0%
Warren Avenue	33	18	55%	20	61%
Total	241	72	30%	76	32%

- 1.6.13 It can be seen that 72 vehicles were recorded as parked during the Wednesday survey and 76 during the Thursday survey. These represent parking stress levels of 30% and 32% respectively, with spare capacity for 169 and 165 vehicles on the respective survey days.
- 1.6.14 A threshold of 80% is used to define high levels of on-street parking stress. Spare capacity for 121 and 117 vehicles was recorded on the respective survey days before this 80% threshold would be reached. This suggests that a high degree of spare on-street parking capacity exists in the immediate vicinity of the Site.
- 1.6.15 The Proposed Development is anticipated to generate on-street parking demand for one vehicle. This would increase parking occupancy levels by 0.4%. This represents a negligible increase in on-street parking demand. Vehicle movements associated with this parking demand would not materially impact upon highway safety in the vicinity of the Site.
- 1.6.16 For robustness and to present a worst case assessment, it is noted that should all six units generate parking demand for one vehicle (and therefore on-street demand for four vehicles), this would increase on-street occupancy by 0.17%. This is also considered a negligible increase that would not have a significant impact on highway safety or vehicle movements.



## 1.7 Public Transport Accessibility

### LBL Comments:

*“Because of the very poor Public Transport accessibility Level, the parking demand at the application site will exceed the proposed level of off-street parking at the development and will result in overspill parking on-street on Hillbrow Road” (Paragraph 68)*

*“Regardless of the public transport accessibility level, as previously discussed, Hillbrow Road provides a poor pedestrian environment, which would act as a barrier, particularly for vulnerable users, to reaching the local public transport network” (Paragraph 86)*

- 1.7.1 The Transport Statement provides a detailed overview of public transport services that operate in the vicinity of the Site. These include a number of local bus services (accessible from Bromley Road to the north and Warren Avenue to the south) and rail services from Ravensbourne Station, a 850m walk distance from the Site (equating to a 10 minute walk or three minute cycle).
- 1.7.2 The Full Decision Report notes the PTAL of the Site to be 1b (Paragraphs 13, 63, 68, 85(1). It is recognised that this is the PTAL reported through TfL’s WebCAT system. However, it is important to note that WebCAT does not account for the pedestrian route to Ravensbourne Station. Inclusion of this route reduces the walk distance to 850m, which is within TfL’s recommended 960m walk distance.
- 1.7.3 SYSTRA has undertaken a manual PTAL assessment in accordance with TfL methodology to include the correct walk distance to Ravensbourne Station. This is summarised in Table 2-2 of the Transport Statement and confirms a PTAL of 2, with the Accessibility Index of the Site increasing from 4.13 to 8.1. Whilst this is still considered a ‘poor’ level of public transport accessibility, it represents a considerable improvement when compared to the WebCAT calculation.
- 1.7.4 **Section 1.5** of this Technical Note addresses concerns raised regarding pedestrian environment on Hillbrow Road.

## 1.8 Development Precedence

- 1.8.1 A review of LBL and LBB’s planning portals has been undertaken to confirm that the principle of residential development has been accepted by both authorities, including on Hillbrow Road. This review has confirmed that a number of applications seeking to increase residential density have been granted permission, as set out below.
- 1.8.2 These applications are considered to present material factors relating to suitability of the Proposed Development.





### 18 Hillbrow Road (LB Lewisham)

**Planning Reference:** DC/19/111003

- 1.8.3 Planning permission was granted in July 2019 for the construction of a first floor extension and the conversion of an existing two-bed bungalow to provide two three-bed units. No concerns were related to accessibility, pedestrian or vehicular safety, trip generation or the suitability of Hillbrow Road to accommodate additional residential development.
- 1.8.4 The Delegated Report accepted that the development would generate additional on-street parking demand, noting that *“the Council do not have any parking surveys here to suggest there is parking stress at this location”*.

### Upfield, Hillbrow Road (LB Bromley)

**Planning Reference:** 16/04910/FULL1

- 1.8.5 Planning permission was granted for the demolition of a four-bed detached dwelling and construction of six two-bed flats and one one-bed unit. The Officer’s Report for the planning permission notes that the impact of the development proposals and associated uplift in trip generation would be acceptable, and that the development would not have a detrimental impact on pedestrian or vehicular safety.
- 1.8.6 It was also noted that an informative should be attached to permission that, given Hillbrow Road is unadopted, *“the condition of the section of the street to which the proposed development has a frontage should, at the end of development, be at least commensurate with that which existed prior to commencement of the development”*.
- 1.8.7 This application sought to provide a greater number of residential units (seven compared to six) and bedrooms (13 compared to nine) than the Proposed Development. It has been built out and is now occupied.

### Sunset Hill, Hillbrow Road (LB Bromley)

**Planning Reference:** 15/02144/FULL1

**Appeal Reference:** APP/G5180/W/15/3137512

- 1.8.8 Permission was granted via appeal for demolition of an existing dwelling and construction of 10 two-bed apartments, representing an uplift of nine units. This application was revision to a previously granted permission for nine units (ref: 14/04139/FULL1).
- 1.8.9 Planning permission was originally refused on the grounds of over-intensification of the site and impact of amenity to neighbouring properties. No transport concerns, including pedestrian and cyclist movement, safety or accessibility were not raised as reasons for refusal of the application.
- 1.8.10 Within the Appeal Decision, the Planning Inspector noted that, given the status of Hillbrow Road as an unadopted street, an informative should be attached *“that the condition of the section of the street to which the proposed development has a frontage*

should, at the end of development, be at least commensurate with that which existed prior to commencement of the development”. No concerns regarding road user safety, pedestrian movement or the unsuitability of Hillbrow Road to accommodate development were not identified. Furthermore, the Appeal Decision notes a requirement for a condition relating to bicycle storage is required to reduce reliance on private motor vehicles. This suggests the Planning Inspector considered Hillbrow Road suitable to accommodate trips undertaken by non-vehicle modes.

- 1.8.11 The Planning Inspector noted that whilst comments were raised by local residents relating to the condition of Hillbrow Road, these were not considered of sufficient weighting to impact their decision.

### **1 Brunswick Terrace, The Knoll (LB Bromley)**

**Planning Reference:** 11/01235/FULL1

- 1.8.12 Planning permission was granted in August 2011 for amendments to an existing permission for the construction of 13 four-bed terraced houses at 1 Brunswick Terrace on The Knoll, an unadopted road in Bromley. The road is unsurfaced and does not provide footways for pedestrians, as shown in **Figure 15**.

**Figure 15. Brunswick Terrace, The Knoll**



- 1.8.13 No objections were raised by LBB Highways, and the application was noted as being acceptable and would not result in a significant loss of amenity to local residents nor detrimentally impact upon the area’s character. No issues regarding highway safety or the suitability of The Knoll to accommodate development were identified.

### **Refused Development**

- 1.8.14 It is noted that there are some instances where development proposals have been refused planning permission and dismissed at appeal on roads that are of an unsurfaced nature. However, it is important to note that no such applications were refused due to the



condition of the road on which they were located or for reasons of road user safety, pedestrian movement or accessibility.

- **Billingsford, Elstree Hill** (LB Bromley): Planning permission was refused in August 2015 (ref: 15/01673/FULL1) for the demolition of an existing dwelling and construction of 4x two-bed and 1x one-bed flats, with a new access provided onto Elstree Hill. Development was refused on grounds of its bulk and sitting impacting upon the amenity and overlooking of neighbouring properties, and impact of the development's scale on the character of the area. The application was subsequently dismissed at appeal in February 2016 for the same reasons. The Planning Inspector noted issues raised by local residents including adequacy of parking area and cycle storage, but that these were not determining matters. No concerns were identified regarding the condition of Elstree Hill, which is unsurfaced and does not provide footways.
- **76B The Avenue** (LB Bromley): Planning permission was refused in November 2018 (ref: 18/02816/FULL1) for the demolition of two detached houses and construction of 11 two-bed self-contained apartments. A new vehicular access would be provided, with the Delegated Report noting this would not have an adverse impact on highway safety. Reasons for refusal were in relation to the building design, failure to provide adequate private outdoor space and the over-concentration of two-bed units in the area. No concerns were raised regarding accessibility by non-vehicular based modes or the convenience and safety for pedestrians. Whilst The Avenue provides an off-road pedestrian route, it is very narrow (<1m wide) and is unsurfaced. An appeal was not lodged.

## 1.9 Summary & Conclusion

1.9.1 This Technical Note addresses the transport-related concerns and reasons for refusal set out by LBL. These concerns and associated responses are summarised as follows:

- **Hillbrow Road Surface:** A number of streets within the vicinity of Hillbrow Road are in a similar condition (i.e. unsurfaced and with footways either not provided or only for a portion of the road). These roads all accommodate residential development in a similar manner to Hillbrow Road. It should therefore be recognised that the principle of residential units on roads that are unsurfaced and do not provide footways has been accepted. A number of new developments have been granted permission on Hillbrow Road.
- **Pedestrian Movement & Safety:** The Technical Note has demonstrated that pedestrian movement is currently safely accommodated on Hillbrow Road without issue. No road collisions have been recorded on Hillbrow Road, or at its junctions with Coniston Road and Calmont Road. Hillbrow Road is therefore suitable to accommodate pedestrian movement, including trips associated with the Proposed Development. No existing safety issues have been identified on Hillbrow Road that would be exacerbated by the Proposed Development. The road surface encourages vehicle drivers to travel at lower speeds and acts as a natural traffic calming measure.
- **Parking:** Local-level car ownership data from the 2011 Census suggests that the Proposed Development will generate parking demand generated for three vehicles, with two vehicles to be accommodated on-site. On-street parking demand for one vehicle is therefore anticipated to be generated. This would increase parking occupancy levels within a 200m radius of the Site by 0.4%. Such levels of parking will not significantly impact upon pedestrian movement or safety.

- **Public Transport Accessibility:** A number of local bus services (from Bromley Road and Warren Avenue) and rail services from Ravensbourne Station, a 850m walk distance from the Site (equating to a 10 minute walk or three minute cycle). SYSTRA's manual PTAL assessment (in accordance with TfL methodology) confirms a PTAL of 2, with the Accessibility Index of the Site increasing from 4.13 to 8.1 versus TfL's WebCAT system. Whilst this is still considered a 'poor' level of public transport accessibility, it represents a considerable improvement.

1.9.2 In conclusion, the condition of Hillbrow Road does not have an adverse effect on the movement and/or safety of pedestrians and cyclists. The level of trips generated by the Proposed Development (an uplift of five residential units) would not be expected to increase pedestrian trips to such a level that would result in significant impacts to pedestrian movement or safety. Vehicle movements forecast would not materially impact upon highway safety in the vicinity of the Site. Furthermore, there is a precedence of residential development on unsurfaced roads being accepted, including on Hillbrow Road itself.

1.9.3 Paragraph 109 of the National Planning Policy Framework (NPPF) states that *"development should only be prevented or refused on transport grounds if there would be an unacceptable impact on highway safety, or on the residual cumulative impacts on the road network would be severe"*. This Technical Note has demonstrated that the Proposed Development will not have a severe impact on the operation of the local road network or the safety of all road users. The condition of Hillbrow Road is pre-existing, and the road has operated without issue for a number of years. This would not be unacceptably impacted on as a result of the Proposed Development.





**APPROVAL**

Version	Name		Position	Date	Modifications
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