

Rule 6 Party

Statement of Evidence of Effect on Highway Safety, Parking and Congestion

Site: 2, 4, 6 and 8 Danson road, Bexleyheath, Kent, DA6 8HB

Proposal: Demolition of the existing dwellings and erection of a part 1/2/3 storey building to provide a 70-bedroom nursing home, with associated access alterations, car and cycle parking, landscaping and amenity space.

Pins Ref: APP/D5120/W/22/3293225

LBB Ref: 19/03072/FULM

Prepared by V Clark

Speakers Credentials

- 13 years a Government approved driving instructor
- 25 years a warranted Government driving examiner
- 20 years a member of the London Road Safety Council, including being Chairman and Treasurer
- 24 years a Local Councillor
- Chairing the Road Safety Committee
- Member of the Planning Committee - serving as Vice Chairman and Chairman
- Lived within the vicinity of Danson Road for over 50 years

1. Introduction

1.1. This Statement sets out the Rule 6 Party evidence regarding the effect on Highway Safety, Congestion and Parking with the proposed nursing home development, relating to the appeal against the Council's refusal of planning application ref: 19/03072/FULM for proposals at 2-8 Danson Road, Bexleyheath, involving:

Demolition of the existing dwellings and erection of a part 1/2/3 storey building to provide a 70 bedroom nursing home, with associated access alterations, car and cycle parking, landscaping and amenity space.

1.2. The Statement of Evidence of Need is structured as follows:

- Section 2 – Setting the scene
- Section 3 – Analysis of the Council's Report
- Section 4 – Analysis of the Appellant's Report
- Section 5 – Access
- Section 6 – Parking
- Section 7 – Summing Up

1.3. This statement has been prepared by:

Name: Valerie Clark Date: 21st November 2022

On Behalf of the Rule 6 Party

2. Setting the Scene

- 2.1 I am astounded that we are even here discussing this issue on the grounds of road safety and traffic, as it is a no brainer that this project **will** have very adverse effect on road safety both during the demolition, the building and throughout its usage.
- 2.2 The Council's report noted all the issues that should a have been good enough reasons for refusal in the first instance, but it seems that they crumpled after receiving assurances from the Applicant that these grave concerns could be mitigated. this, however, did not account for demolition and building methodology. Both issues are far too important to leave until after the committee had made its decision, and far too late for any meaningful dialogue with residents.
- 2.3 Danson Road is one of the busiest roads in the Borough, with Danson Road traffic lights and the Brampton Road junction, both being extremely busy and often jammed up completely.
- 2.4 These junctions are the link between the industrial North of the Borough and the South with the A2 a very prominent destination. It is also the first access point to the A2 for the Welling area.
- 2.5 It is a prominently signed access point from the coast for caravans to access the Abbey Wood camp site.
- 2.6 Danson traffic lights are a busy access point for pedestrians to the park, for children to the Crook Log Primary School, the Brampton Road Youth Club, Adult Education Centre, Children's Centre and the Sports Centre.

3. Council's Report

- 3.1 Referring to the Council's response to the application 6.1, 6.2 are noted but 6.3 is rather questionable, as the measures put forward are totally inadequate and are not enforceable, as anyone living by a compulsory traffic instruction will tell you.
- 3.2 At times of hold up, tailback or delay, human nature takes over and drivers will do their own thing, especially the "so called" professional drivers that are on a tight timetable.
- 3.3 Classic examples of this are the one way street in Standard Road, Bexleyheath and the No Entry street behind the Civic Offices.
- 3.4 There is nothing in the Ardent Consulting Engineers Report that gives any confidence that they either understand the issue or can possibly mitigate it.
- 3.5 6.4, 6.5, 6.6, 6.7, 6.8, 6.9, 6.10, 6.11 are also all noted.
- 3.6 Under conclusions, all the facts were accurate, and are still accurate and still apply, so the residents are at a loss to know why the Council's Planning Officers have decided not to take part in the review and uphold the views and wishes of the Planning Committee. At the very least it should have gone back to Committee before they could overturn the directive from elected members.
- 3.7 One must ask why the Council did not undertake a traffic count to establish the true facts of the current traffic volume and why they have not undertaken a pedestrian count to establish how many primary school children use the Danson traffic light junction to go to Crook Log School.
- 3.8 Unfortunately, the Council does not have any specifically trained Road Safety Officers and that is why their traffic report is wanting in so many areas.
- 3.9 The difference between the Appellant's report and the residents' concerns are the difference between an ideal situation and reality.

4. Appellant's Report

- 4.1 I have read this report with a certain amount of amusement, as a lot of the statements are now totally out of date and in places very spurious. It was obviously written by someone that did not spend much time in the area, only reporting on isolated occasions (probably in lock down) and waiting for the very rare occasions, when there was little or no traffic present, to take pictures.
- 4.2 It does not paint a picture that is experienced by residents' day in day out, and that is without allowing for the many occasions when "special events" take place in the park, that make their lives even more intolerable with regards to traffic conditions.
- 4.3 1.2 is a bold statement in the first sentence and one that I and the residents cannot agree with.
- 4.4 2.11 is a bit disingenuous as it is a limited bus route of a half hourly, unreliable service, using a single decker bus.
- 4.5 2.14, Danson road is predominantly double yellow lines with limited parking alongside the park.
- 4.6 2.15, I do not call 4 crossing points in such a long road "numerous".
- 4.7 2.23, this recorded data is not recent and even "slight severity" causes severe hold ups. It does not account for knock for knock, which also takes time when drivers have to exchange details, which in turn causes delay and junctions being jammed.
- 4.8 2.25, to say that the proposed application would cause "negligible change" is absolute nonsense.
- 4.9 2.26, this data is 11 years out of date and therefore a worthless comment.
- 4.10 2.27, car ownership in Bexley is extremely high, as it does not have the public transport infrastructure expected of a London Borough.
- 4.11 2.36-2.38, staff may be compelled to take buses if they live nearby but family of residents may come from further afield, so another worthless statement.
- 4.12 2.61, since this report was put together the train infrastructure has changed somewhat.

5. Access

- 5.1 The access arrangements in this report are totally inadequate and unenforceable. Even the updated proposed arrangement does not take account of human behaviour and the fact that it would not be legally enforceable.
- 5.2 The suggested alternative routes do not take into account that all the nearby turning point roads are already over parked and leave little room for manoeuvre. Danson Mead is a narrow road that is heavily parked and already suffers from impatient motorists, coming from Welling, using it to get ahead of the delay at the traffic lights. Meeting traffic head on is extremely difficult.
- 5.3 Dallin Road is, again, used by impatient drivers in Danson Road to cut out the inevitable tailback at the traffic lights, is heavily parked and will take you into Sydney Road past the access gates to Crook Log School.
- 5.4 **Health & safety of school children is one of the Mayor of London's priorities and this suggested route goes against his wishes.** These arrangements will seriously affect the lives of local residents and safety will be impacted.

6. Parking

- 6.1 Parking may adhere to the Mayor of London's criteria, but he has never understood the issues associated with an outer London borough that does not have the luxury of the transport infrastructure of an inner London borough.
- 6.2 There is no free parking space nearby, as residents find it hard to park near their homes in surrounding roads at present.
- 6.3 I am pleased to see that cycle parking will be provided. The Mayor will be pleased. We often play a game of "spot the cyclist in a cycle lane". It's a rare sighting.
- 6.4 3.28, the Council's refuse service operates from Danson Road and causes delay at present. I would presume that this would be a commercial collection at times other than the regular collections in the road.
- 6.5 4.4, para 108 is inconclusive.
- 6.6 4.4c, not being achievable.
- 6.7 4.5, para 109 is a very weak argument and effectively comes down on the side of refusal, as it has not been proven by the Appellant that it will not negatively impact on the area.

- 6.8 4.9, is well stated but very woolly and again not very relevant to the actualities of this application. The Mayor has not been able to “strive” in Bexley’s favour since he was elected.
- 6.9 4.10 to 4.24, ditto.
- 6.10 4.25 to 4.31, promote, strive, seeks to, optimise, all very good words but that is all they are. Deeds have not followed these words!
- 6.11 Summary - Nothing is clear at all. If it was clear, a panel of Councillors, elected to look after their residents’ concerns, would not have turned it down and residents would not be objecting now with much fervour.
- 6.12 Trip Generation - I question the relevance of comparing sites. It is like comparing apples with pears.
- 6.13 Summary of conclusions - 6.5, no adequate plan has been put forward that does not severely disadvantage users of the property and local residents.
- 6.14 6.6, it may comply with Bexley standards, but it is still inadequate.
- 6.15 6.8, is totally unbelievable, pure fancy and laughable.

7. Summing Up

- 7.1 Danson Road is a residential road, not a road where a business would sit well for many reasons, least of all from persistent deliveries and visitors to such a large conglomerate.
- 7.2 The Council’s report was accurate and is still accurate and council officers should be here defending it.
- 7.3 The Appellant’s report appears to be professionally produced but on closer inspection is full of out-of-date information, inaccuracies and irrelevant statements.
- 7.4 The residents are living with the increasing traffic levels, the increased snarl ups, the increase in crashes and have to contend with worrying road safety issues.
- 7.5 It is unclear if this is to be a care home or a nursing home. A nursing home would necessitate extra staff and extra visitors/professional callers.
- 7.6 To be able to take so many photos of a Danson Road with little or no traffic in sight, beggars belief and I wonder if creative measures were undertaken.

- 7.8 Recorded data is out-of-date and does not equate to actual delays and holdups, indeed within the last month there have been two serious crashes on the A2 that made Bexleyheath and Welling a permanent traffic jam all day long, as cars always take to alternative routes when the A2 is having difficulties.
- 7.9 There was a bad crash at the Danson junction; one of several very recently that caused traffic jams back through Welling, through the whole of Bexleyheath and backed up Brampton Road to nearly Abbey Wood. Buses could not get through and, indeed, one bus crashed at the site because of it. this lasted for a considerable amount of time.
- 7.10 There definitely will be parking and access issues when the building is in use and I hate to think what kind of chaos the builders will bring with them.
- 7.11 Unfounded assumptions have been made in the Appellant's report, without the benefit of any actual assessments being done. It is a very poor report.
- 7.12 The Planning Department has taken unprecedented steps throughout the build up to the Inquiry by not keeping residents abreast of any developments, culminating in its decision to not contest the Committee's decision to refuse.
- 7.13 They have not even attempted to let residents know their grounds in deciding not to engage with the hearing. They should be here supporting their report and representing their community.
- 7.14 The residents have been left to "wing it" on their own in a "David and Goliath" fight, which is totally unacceptable.
- 7.15 I hope that the Inspector will take into account all the very pertinent points that they will bring to the Inquiry.