# Consultee Comments for Planning Application 19/03072/FULM

# **Application Summary**

Application Number: 19/03072/FULM

Address: 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 plus basement

building to provide a 70 bedroom nursing home, with associated access

Case Officer: Ian Smith

## **Consultee Details**

Name: Mr Les Henry

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On Behalf Of: Transport And Development (L.B.Bexley)

#### **Comments**

The proposal site lies on the western side of Danson Road a short distance to the south of the traffic signal-controlled junction with Crook Log and Park View Road, which are all classified roads and designated as London Distributor Roads within the Councils Unitary Development Plan (UDP) road hierarchy.

On street car parking is controlled by yellow line waiting restrictions that operate between 8am and 6.30pm Monday to Saturday.

The site has a PTAL of 3-4 (Moderate-Good) with 9 bus routes within the specified walking distances for PTAL calculation.

The proposals are for the 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.

The existing vehicular accesses to the existing houses would be removed and a new vehicular entrance would be provided at the southern end of the Danson Road frontage with the exit toward the northern end of the site frontage. The exit would be designed to discourage drivers turning right out of the site.

A total of 17 car parking spaces would be provided for staff and visitors with 3 positioned adjacent to the southern boundary, 5 adjacent to the northern boundary and 9 in an echelon style adjacent to the eastern boundary. At least 1 space should be allocated to those with reduced mobility.

Electric vehicle charging points would be provided with 20% fitted with active charging points with the remainder with passive provision for activation later.

Adequate turning space would be provided to allow panel vans and fire tenders to satisfactorily enter and leave the site in a forward direction. Refuse and recycling would be collected from Danson Road as per the existing situation for the houses.

The applicant has suggested the following levels of staff for the proposed care home: -

Daytime (7 days a week):

14 care staff (nurses and carers) (7am to 7pm)
Housekeeping team x 3 (8am to 4pm)
Chef (8am to 4pm)
Kitchen assistant (8am to 8pm)
Lifestyle Co-ordinator (9am to 5pm)
Administrator/weekend receptionist (9am to 5pm)

Daytime (Mon Fri only):

Manager (9am to 5pm)

Deputy (9am to 5pm)

Maintenance (9am to 5pm)

Night time (7 days a week):

7 care staff (nurses and carers) (7pm to 7am)

Deliveries tend to be in the mornings (food, medical supplies etc),
and usually only Monday to Friday.

In total, it is expected that around 24 staff would be employed on the site on a typical weekday.

Bicycle parking for 16 cycles would be provided in accordance with London Plan standards.

The Transport Statement submitted in support of the application includes an assessment of the likely traffic generation and car parking demand of the proposed care home compared with the existing 4 dwellings using the industry standard TRICS database.

The analysis suggests the proposals would generate between 10 and 8 additional vehicular trips during the am and pm highway network peak periods respectively and the proposed car parking demand would amount to 11 vehicles.

The applicant has stated that they operate several nursing, residential and care homes across south east England and East Anglia and the applicant has carried out a parking survey of the existing facility at Heathfield Court, Colyers Lane, Erith which has 66 bedrooms and 18 car parking spaces.

This site has a lower PTAL of 1b (Very Poor) than the application site which has a PTAL of 4 (Good) so the opportunities to use public transport for the application site are better.

The proposal is a little larger than the surveyed site (70 bedrooms) with 17 car parking spaces. However, given the additional benefit of the higher PTAL level, it is likely that car use will be naturally offset. The applicant is also willing to introduce a Travel Plan to promote sustainable travel to and from the site.

The busiest period of accumulation recorded in the survey was around 12.30pm when 12 parking spaces were occupied and at no times did the car parking at full capacity.

The Highway Authority therefore considers the conclusions of the Transport Statement in terms of traffic generation and car parking accumulation to be reasonable.

However, the Highway Authority is aware of a considerable level of concern regarding the position of the proposed access and egress in relation to the traffic signal-controlled junction immediately to the north of the site, and the possibility of vehicles turning right out of the site leading to highway safety hazards.

The Highway Authority therefore requested additional assessment and justification of the proposed access arrangements and its impact on the local highway network in respect of the following points: -

- 1. Based on TRICS data (or any other comparable data survey the applicant may have relating to a comparable care home) the estimated hourly flows for a 24 hour period for all vehicles entering and exiting the site (servicing, staff and visitor), together with a comparison with the existing 4 dwellings;
- 2. The assignment of the above vehicle movements at the sites access and egress points and on the adjacent highway based on the assumption of a 50/50 split of north-south traffic on Danson Road in line with the observed proportional flow and an assumed 50/50 split of traffic east-west at the Danson Road/Crook Log signal controlled junctions. Diagrams should be provided for the AM and PM network peaks together with the development peak hour;
- 3. The anticipated and potential routes for vehicles heading back onto the A2 if unable to turn right out of the access;
- 4. A review of the starting and finishing times for staff to ensure that these fall outside of busy periods on the road network as far as possible;
- 5. Further consideration how the vehicular right turns from the site will be prevented and enforced,

other than by a formal Traffic Management Order under highway legislation, which is not considered by the Highway Authority to be appropriate for a private access of this type;

- 6. The perceived benefits in reducing the number of individual vehicular access/egress points to the site:
- 7. An assessment of the cause and potential implications and mitigation measures that would need to be considered as a result of injury accident that occurred in 2019 in the vicinity of the site; and
- 8. Any other mitigation measures that would assist in reducing vehicle movements which could be incorporated into a traffic management plan and/or a travel plan.

The applicant has provided the following additional comments: -

# A Traffic generation

- 1. The TRICS data has been revisited to understand the daily traffic movement patterns of both the existing residential properties and the proposals which indicate the maximum increase in departure movements is expected to be 6 vehicles, and overall throughout the day the increase in departing traffic is expected to be 46 vehicles. This level of increase is not significant.
- 2. Traffic surveys were undertaken at an existing care home operated by the applicant at Heathfield Court, Northumberland Heath. The survey covered 12-hour period and recorded 65 vehicle arrivals and 64 vehicle departures.
- 3. This equates to around 1 movement per bedroom per day, and covers all staff, visitors, and servicing movements. The data from the survey is comparable to the movements calculated from the TRICS data.

## **B** Traffic Distribution

- 4. The requested assumption of traffic distributing 50% north/south on Danson Road and then 50% on Park View Road/Crook Log has been applied to the peak hour departure total of 5 exiting vehicle movements during AM peak hour and 7 exiting vehicle movements during the PM peak hour. The likely distribution without restrictions amounts to 2.5 exiting vehicles in the AM peak hour and 3.5 exiting vehicles in the PM peak hour may wish to head south.
- 5. Should those vehicles be redistributed in a northern direction, a total of up to 3 vehicle exiting movements may need to be redistributed onto other routes in the AM peak hour to head south. This could occur by vehicles turning left into Park View Road and using one of the surrounding residential areas to turn and return to the signal-controlled junction to turn right. Or alternatively, by turning right junction of Danson Road with Crook Log and taking a route via Dallin Road to the east.
- 6. The level of peak hour traffic movements is very small and during other periods such movements will be even less.
- 7. Applying these proportions to the daily vehicle movements from TRICS, would result in 28 vehicles wishing to turn southbound at the exit. Over the course of a typical 12-hour day this

equates to just 5 vehicles per hour across an average day.

- 8. When including the effects of existing residential traffic already making turning movements on the network from private driveways this would further lessen traffic impacts.
- 9. Data provided by the applicant indicates 91% of their staff at their Heathfield Court care home live within 5-mile radius of the site. Similarly, 65% of their residents come from addresses within 3-mile radius.
- 10. The number of vehicles likely to want to turn right out of the site naturally is still a very small proportion of trips to the site. It should be noted at this stage that the existing residential properties have no restrictions at all on the movements that vehicles make, meaning that vehicles can turn north or south from driveways as they see fit.
- C. Anticipated and potential routes for vehicles heading back onto the A2 if unable to turn right out of the access
- 11. The potential routes are identified as follows:
- a. Dallin Road and Sydney Road/The Grove to the east to gain access to Danson Road;
- b. Danson Mead to the west and return to the Crook Log/Danson Road traffic signal-controlled junction; and
- c. Upton Road to the east, which provides a direct connection to the A2.
- 12. There are no inherent issues with vehicles using any of these routes and the redistributed traffic will be a very small proportion of the development trips.
- D Review of the starting and finishing times for staff to ensure these fall outside of busy periods on the road network as far as possible.
- 13. Most staff are likely to arrive and depart outside of the typical network peak hours. It is only the manager, deputy manager and maintenance staff who typically have working hours from 9am 5pm. Most staff arrive at the site before 8am, with the main carers working 12-hour shifts between 7am and 7pm.
- 14. Information provided by the applicant suggests that approximately 86% of staff live within 3 miles of their place of work, and for the Northumberland Heath site this is as high as 91%. It is anticipated a large proportion of staff will live in and around Bexleyheath.
- 15. Deliveries are generally in the morning, after the morning peak hour traffic (Monday-Friday).
- 16. Visitors are also the most likely to attend site outside of peak traffic hours. Visits occur between set hours in order that other on-site duties can be performed, and to provide routine for residents. It is anticipated a large proportion of residents would have previously lived within a 3-mile radius of the care home and subsequently, it would be logical to expect that a high proportion of visitors would also be drawn from the immediate area. This again would provide opportunities for sustainable travel modes to be conducted.

E Further consideration how the banning of right turns from the site can be prevented and enforced, other than by a formal Traffic Management Order under highway legislation.

- 17. The proposals to discourage the right turn on exit are as follows.
- a. Kerb alignment to position vehicles so that a right turn is made difficult;
- b. Provide signage to advise of the left only turn out of the site;
- c. Orientate car parking spaces to encourage entry from the southern access and departure from the northern most access:
- d. Monitor the movement using CCTV (to be situated on-site);
- e. Introduce the right turn mitigation strategy where: -
- i. Management can enforce staff to exit left and remove parking rights for staff failing to adhere to the situation;
- ii. Management can make visitors aware of the exit left arrangement when they sign in / out of the reception;
- iii. Management can advise residents and families of the restrictions when they become residents as part of their contract;
- iv. Provide information on the website to inform of the left only exit;
- v. Advise all suppliers of the left only exit.
- 18. The above to be secured through a planning condition for a Right Turn Mitigation Strategy which would be subject to approval by the Highway Authority.
- 19. Alternative access points and amendments have been considered such as a central island on Danson Road to physically prevent the right turn. However, there is insufficient road space.
- 20. Swapping the access and egress would result in vehicles turning right into the site waiting on Danson Road close to the signal junction with Park View Road which could result in rear shunt type accidents and could result in vehicles queuing back to the signal junction.
- 21. A new centrally located access has been considered however, this would not enable space for vehicles to turnaround and would result in vehicles reversing out. Pushing the proposed care home to the west would make the scheme unviable through the reduced footprint of the building.

F The perceived benefits in reducing the number of individual vehicular access/egress points to the site.

- 22. The proposals result in the reduction of the current number of vehicle access points from four to two.
- 23. Currently, there are no restrictions in vehicle movements into or out of the existing driveways.
- 2 Danson Road has no restrictions on its movements either inbound or outbound. The proposals will restrict exit only movements at this location in the future and will stop potential right turn movements in and out at this point.
- 24. This also places right turn in movements further away from the signal junction eliminating the chances of traffic queuing back to the signal junction.

25. The onerous right turn out movements are eliminated in the proposals.

G An assessment of the cause and potential implications and mitigation measures that would need to be considered as a result of injury accident that occurred in 2019 in the vicinity of the site.

26. The serious incident was a result of a car exiting a driveway, edging out into stationary traffic when a motorcycle emerged from between the queuing traffic.

It should be reminded that this is a single, isolated accident recorded in the 5-year period of the collision data and does not suggest a trend.

27. In relation to streets with direct frontage access, Manual for Streets Guidance (MfS) states: - It was found that very few accidents occurred involving vehicles turning into and out of driveways, even on heavily-trafficked roads.

Links with direct frontage access can be designed for significantly higher traffic flows than have been used in the past, and there is good evidence to raise this figure to 10,000 vehicles per day.

It could be increased further, and it is suggested that local authorities review their standards with reference to their own traffic flows and personal injury accident records.

The research indicated that a link carrying this volume of traffic, with characteristics similar to those studied, would experience around one driveway-related accident every five years per kilometre.

- 28. The recorded accident is an isolated incident and has not been replicated in earlier years (previous 5 years).
- 29. As has been identified, the banning of the right turn will restrict this manoeuvre, and the movement of vehicles from the site does not occur in significant volumes during the peak hours.

H Any other mitigation measures that would assist in reducing vehicle movements which could be incorporated into a traffic management plan and/or a travel plan.

- 30. The applicants experience has shown most staff are based locally to site, and typically walk, cycle, or use public transport to travel to and from work. Staff will be encouraged to travel to work by sustainable modes of travel, indeed the sites PTAL of 4 helps achieve this.
- 31. An Employee Travel Plan will be produced to enforce and support this.
- 32. The combination of physical restrictions and signage, marketing and information to make all staff, employees, and visitors aware of this situation, and the focus on Travel Planning measures will help to minimise vehicle movements.

The Highway Authority considers all possible material highway impacts have been fully assessed and found to be acceptable and therefore has no objections subject to the imposition of the following conditions: -

1. The proposed access and egress to the site onto the existing highway shall be constructed in accordance with design and specification first submitted to, and approved in writing by, the Local Planning Authority before the development is first brought into use.

Reason: - To ensure a satisfactory standard of development and in the interests of highway safety.

2. The use of the land for vehicle parking shall not be commenced until the area has been laid out, surfaced, drained and lit in accordance with details first submitted to, and approved in writing by, the Local Planning Authority and shall always be permanently maintained and available for such use thereafter to the Authoritys satisfaction.

Reason: To ensure a satisfactory standard of development and in the interests of highway safety.

3. The access to the site shall be provided with those parts of 2.4m x 43m vehicular visibility splays which can be accommodated within the site in both directions and shall be maintained free of all obstacles to the visibility between heights of 0.6m and 2.0m above the level of the adjoining highway.

Reason: In the interests of highway safety

4. The access to the site shall be provided with those parts of 2.4m x 2.4m pedestrian visibility splays which can be accommodated within the site in both directions and shall be maintained free of all obstacles to the visibility between heights of 0.6m and 2.0m above the level of the adjoining highway.

Reason: In the interests of highway safety

5. Details of arrangements for storage of refuse (including means of enclosure for the area concerned where necessary) shall be submitted to, and approved in writing by, the Local Planning Authority before any part of the development hereby permitted is commenced and the approved arrangements shall be completed to the satisfaction of the Authority before any part of the development is first occupied, and permanently maintained thereafter to the Authoritys satisfaction.

Reason: In the interests of amenity and highway safety.

6. Details of arrangements for cycle storage (including means of enclosure for the area concerned where necessary) shall be submitted to, and approved in writing by, the Local Planning Authority before any part of the development hereby permitted is commenced and the approved arrangements shall be completed to the satisfaction of the Authority before any part of the development is first occupied, and permanently maintained thereafter to the Authoritys satisfaction.

Reason: To ensure a satisfactory standard of development and to encourage travel to and from the site by sustainable means.

7. Before work commences on the site, a Travel Plan incorporating measures to reduce car traffic by encouraging travel to and from the site by other means of transport shall be submitted to, and approved in writing by, the Local Planning Authority. The plan shall include a methodology for its implementation and monitoring. The development shall not be occupied or operated other than in complete accordance with the agreed Travel Plan. No part of the development shall be occupied prior to implementation of the approved travel plan (or implementation of those parts identified in the approved travel plan as capable of being implemented prior to occupation). Those parts of the

approved travel plan that are identified therein as being capable of implementation after occupation shall be implemented in accordance with the timetable contained therein and shall continue to be implemented as long as any part of the development is occupied.

Reason: In the interests of minimising the environmental impact of the scheme and to promote sustainable travel to and from the site.

8. Details of a Right Turn Mitigation Strategy shall be submitted to and agreed in writing by the Local Planning Authority prior to the first occupation of the proposed development.

Reason: In the interests of minimising the impact of the scheme on the highway network and highway safety.

#### Informative:

1. The applicant should be advised to contact the Councils Street Scene Services Department in respect of the construction of the proposed vehicular access to the site.