

London Borough of Southwark  
Received on:  
  
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Development Management

**Re: Engineering Consultancy Ltd**

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Your ref: Planning Application Ref: 11-AP-2250  
My ref: Greendale/Aug/2011

Date: 24<sup>th</sup> August 2011

Susannah Pettit,  
Planner Officer – Development Management,  
Regeneration and Neighbourhoods (Floor 5, Hub 2),  
London Borough of Southwark,  
PO Box 64529,  
London  
SE1P 5LX



Dear Ms Pettit

**Re: Greendale Sports Ground, Greendale & Burrow Road, London SE22**  
**Planning Application Ref: 11-AP-2250**

I refer to your letter to Open Planning dated the 10<sup>th</sup> August 2011. I have been specifically instructed to review and comment on the suggestion that a cumulative traffic impact assessment is required to support the above planning application.

The local authority has indicated that they wish the applicant to consider the cumulative traffic impact of the two applications and submit additional information. This request was received prior to considering the two independent application submissions.

A meeting was requested to discuss this request and after initially agreeing to a meeting the request was turned down by LB Southwark.

In order to clarify the request from the local authority as regards the scope of the cumulative Traffic Impact I have discussed the request and the scheme issues with the Team Leader, Major Applications Team, Mr Adrian Dennis. Mr Dennis advises that the scope of the request relates to the matter of potential cumulative on-street parking impact only.

From the outset the applicant and the team have seen the need to undertake a single, consolidated on-street parking stress survey which would be utilised for both applications, even though, at the time, they may be submitted independently.

The on-street surveys were conducted in accordance with 'The Lambeth Methodology', a form of survey methodology adopted or used by most of the London Boroughs to gauge on-street parking levels and parking stress at the times of potential maximum residential demand. These on-street surveys were also

supplemented by a Saturday survey of the nearby Sainsbury's car park to consider operational demand linked to the store and the level of reserve parking which exists during a normal peak period of high demand.

It should be noted that these surveys were constructed to meet with the agreed scope of the surveys as requested by the initial transport group case officer as part of scoping the transport assessment for both of the application sites.

The surveys were undertaken over two nights. These were during the early hours of the morning of Thursday 22<sup>nd</sup> July 2010 and Friday 23<sup>rd</sup> July 2010. Two separate formal beat surveys were undertaken between the hours of 5.00 AM and 5.30 AM and 4.45 AM and 5.15AM respectively, following several informal beat survey observations. The formal surveys were recorded and represent the highest levels of parking recorded in the area during the periods of observation.

Normally the survey area for an application would be based on the walk distance/time from parked vehicle to destination. However, given that this relates to two applications and that the nature of the applications is different it was agreed that two overnight parking surveys would be undertaken and a cumulative analysis and report would be submitted.

This cumulative parking analysis and report is included in both application submissions.

Any normal survey would consider a cordoned area based on a fixed distance from a single locus or centroid. This distance would normally reflect the average walking distance covered in two minutes. It would normally equate to a distance of between 160m and 200m from that centroid location. It was considered that the impact of the two applications may affect a larger area and so two areas were considered but surveyed as one area. It was considered by the Council's transport officer at the time of scoping the surveys that whilst residents may limit themselves to leaving their vehicles within the 160m – 200m catchment, visitors to the sports facilities may opt to walk a slightly greater distance. We would not necessarily agree with this assumption particularly given the degree of formal and informal parking space which is proposed to be provided within the application site. It is also noted that the Council did not adopt this approach when considering their own recent redevelopment of sports and leisure facilities at their East Dulwich premises, dismissing, without assessment, any potential impact of parking on the local area which is not restricted in terms of on-street parking controls.

It would seem perverse to seek a cumulative impact assessment when the periods of maximum demand are unlikely to coincide. The maximum residential demand would occur overnight, this is regarded as an 'industry norm' and all residential peak hour surveys would be geared up to identify this level of demand and assess it on the basis of considering whether any new residential use would be able to be supported in the area or not.

In all three surveys have been conducted:

- Survey Area 1 - St Francis Road, Abbottswood road, Talbot Road, Shaw road, Burrow road, Buxstead Road, Quorn Road and Pytchley Road.
- Survey Area 2 - Dylways, Woodfarrs, Crosthwaite Avenue and Nairne Grove.
- Survey Area 3 - Sainsbury's off-street car park.

Surveys 1 and 2 indicated that in terms of on-street parking availability there were 34 and 154 on-street spaces available in each of the on-street survey areas respectively during the expected period of maximum residential demand.

The overall availability of 188 spaces in the wider survey area is a considerable amount of free kerb-side space for either of the application schemes individually or as a combined package. However it should be remembered that both schemes independently make suitable provision for off-street parking which accords with the use, location and published policy. This parking provision would be utilised before any demand would likely be placed on any on-street provision.

The surveys were carried out in accordance with the requirements expressed by officers at the pre-application scoping stage and are focussed on the periods when the council's officers considered the maximum potential impact would occur related to each of the uses.