

Multistorey Car Park, Earls Way, Orpington - Redevelopment by Tesco Plc (Application No. 04/03193/Full1) Information on the Traffic and Air Pollution Aspects and Objections Thereto

Prepared on behalf of O.C.P.A.G. by Roger Lawson 17/9/2004 (Revised 20/9/2004)
Telephone: 0208-467-2686; email: roger.lawson@btclick.com

1. Introduction. This note explains why the proposed redevelopment of the Orpington Multi-storey car park will result in severely increased traffic congestion and air pollution in the adjacent roads, and why we believe the Traffic Assessment provided for this development is defective.

2. The Background. Although the proposed development will have good public transport links, it is exceedingly likely that the vast majority of the users of the Tesco superstore will travel by private car, particularly bearing in mind the large capacity of the “store” car park. Car ownership in Bromley is not only one of the highest in London, it is higher than most parts of the country (only 23% of households in Bromley do not own a car compared with 37% in London as a whole and 27% in England and Wales - source National Census data 2001). Indeed some 80% of non-employment related trips in Bromley are taken by private car and the proportion of women drivers (who may be the largest users of the development) is still rising.

The proposed development site is located adjacent to one of the main junctions in the local distributor road network for Bromley. It is sited on Station Road which is the main road from Orpington to Farnborough and Croydon (the A232). This road is already severely congested during the rush hours because of traffic heading for Orpington railway station, and being blocked from turning into the station, thus forming a stationary queue as far back as the proposed development site.

In addition the site is very near the war memorial roundabout at the end of Orpington High Street. The High Street often has queues of traffic form on it during rush hours and other busy periods, thus resulting in “gridlock” at the war memorial roundabout when vehicles are unable to exit to their selected route. Similarly queues form on Sevenoaks Road and on Spur Road into the roundabout (sometimes blocked by the queue from Orpington Station running back to the roundabout exit, or by that on the High Street). Photographs as evidence of these circumstances is given in a separate document.

The traffic flows at the war memorial roundabout are also disrupted by pedestrian crossings immediately adjacent to each exit road which are not currently traffic light controlled.

As a result, considerable traffic diverts onto such roads as Knoll Rise, Orchard Grove and other roads in the “Knoll” area so as to avoid these traffic queues and hence bypass the High Street and Station Road. This creates additional disturbance and noise which impacts on local residents and also creates a road safety risk (traffic calming measures have already had to be installed in these roads as a result).

3. The Planning Brief. Bearing in mind the above, the draft Planning Brief prepared for this site said in paragraph 36:

“Additional criteria that will be applied towards development on the site are as follows:

.....

- there is sufficient capacity in the surrounding road network to accommodate the traffic generated;*
- there is no material harm to residential amenity (either from the use itself or from traffic generated by the use);*

.....”

We would argue that the proposed development breaches both of those conditions in that the surrounding road network has insufficient capacity to cope with the additional traffic which will be generated by the development. In addition it will cause excessive atmospheric pollution and also noise pollution which will negatively impact on the surrounding residential properties.

Although the Planning Brief has never been formally adopted it appears that this was simply an “oversight” by the council and it was approved by the Development Control Committee for consultation and submitted to public consultation.

4. Council and London Mayor’s Policies Re Traffic Congestion. The Mayor of London and Bromley Council have adopted policies to try and improve traffic congestion in the borough which has traditionally been seen as a major problem in terms of the economic and environmental costs. Indeed in 1999 the council adopted a target to “*reduce traffic flows by 10% by 2008*” in its Integrated Transport Strategy document, but those targets are unlikely to be met as no such reduction has taken place to date.

The Mayor of London’s Transport Strategy defines “*Reducing traffic congestion, particularly in London town centres*” as a “Key Priority”. This theme has been reiterated in the Bromley Interim Local Implementation Plan in respect of transport. Various policies to reduce reliance on the private car and reduce the impact of traffic congestion are put forward in that document, but the impact on the kind of trips that will be generated by the new development have to date been minimal. In practical terms they are likely to remain minimal.

In essence the proposed development will result in further traffic generation in an area which is already heavily congested. In other words, the result is directly contrary to the stated transport policy objectives of the council and of the Mayor of London.

Note that although the locating of new retail developments in town centre sites with good public transport links is recommended by the Mayor’s transport strategy and by PPG 13, in this case the size of the development will be such that it will become a major “destination” store and hence will generate increased traffic. Bearing in mind the restricted capacity of the existing road network in the vicinity, this seems to be clearly a nonsensical approach to reducing traffic congestion.

5. Air pollution. Congested traffic is a known cause of local air pollution. Orpington High St and Station Road are areas of relatively high air pollution already. Policy ER6 of the Draft Unitary Development Plan (Chapter 14; Environmental Resources) states that: “*In considering proposals for development with a potentially significant direct or indirect impact on air quality, the Council will require submission of an assessment of that impact.*”. Furthermore it says in paragraph 14.16 that “*A development proposal may be seen as unacceptable where an assessment of the impact demonstrates that it would be likely to cause air quality objectives to be breached, and where it is not possible to mitigate that impact through the imposition of conditions on any planning permission.*”

Our belief is that the additional traffic generated by this development, and the resulting increased traffic congestion, will result in significant worsening of the air pollution in the neighbourhood of the development.

No air quality assessment has been submitted for this development when it should have been, and our view is that the increased air pollution would be detrimental to the local environment and may indeed result in breaches of air quality management standards.

6. Additional Traffic Generation and the Traffic Assessment. Tesco are forecasting an additional 400+ traffic movements per hour at peak times, although according to a statement they made at a public meeting they expect shoppers to avoid the store during rush hours and hence not worsen the existing congestion mentioned above. We do not understand the logic of that comment.

We also believe that the suggested additional traffic movements are unrealistically low based on a suggested “catchment area” in the planning application which is probably optimistically small. The proposed store will be one of the largest in south-east London and hence is likely to attract shoppers from a very wide area. The developer should substantiate his data by providing comparisons with other similar stores of their own, or for example in comparison with the new Safeway store which is located near to Sidcup High Street (where traffic problems were encountered for reasons which are no doubt similar).

Our comments on the Traffic Assessment are otherwise:

a - The data obtained on existing traffic flows is very small and consists of a few samples taken over short periods of time on only a few days. We do not believe they accurately reflect the existing traffic flows, particularly at peak periods.

b - The simulation of flows at the junctions assumes “free flows” from the exits which is not true in this case (as pointed out above, traffic queues on Orpington High Street and Station Road run back to the junctions being simulated).

c - It is also known that such models can be grossly inaccurate when junctions are closely spaced so they interact with one another.

d - In addition no account seems to have been taken in the Traffic Assessment of the impact of the pedestrian crossings adjacent to the junctions in the vicinity of the development.

WE THEREFORE BELIEVE THAT THE TRAFFIC ASSESSMENT DOES NOT ACCURATELY REFLECT THE FUTURE TRAFFIC CONDITIONS THAT WILL RESULT FROM THIS DEVELOPMENT.

e - To substantiate some of the above points, we would also point out that the latest revised planning application takes no account of the comments made in the report entitled “Review of Transport Assessment” on the previous similar application by Peter Brett Associates, the independent consultants appointed by the council.

Specifically:

f - In Paragraph 5.1.2 it states: “*The interaction between the junctions and the effect on the overall capacity of the proposed network have not been considered*”

g - In Paragraph 5.22 of the Peter Brett report it also states: “*However based on the information provided, it is considered that the tests undertaken overestimate the capacity provided at the proposed store access junction.*” which reinforces our point that the Traffic Assessment is unrealistic.

Other comments on the traffic assessment are:

h - It states that the “*maximum accumulation in the store car park is now 426 on Friday which is greater than 401 provided for the store car park*”, and goes on to suggest that the excess can use the public car park. However, as pointed out in a separate document, the public car park is of inadequate capacity and there is unlikely to be any spare car parking elsewhere nearby. What happens if drivers are blocked from entering their favourite supermarket? From experience elsewhere in the borough it is clear that they simply form a queue, which in this case would block traffic in either direction.

i- The traffic counts and/or the calculations of traffic loads are clearly unrealistic when set against the existing experience of traffic queues in the vicinity. For example Table 7.3 shows the following maximum “Q” figures (presumably the number of queuing vehicles) before redevelopment takes place, which has been estimated using the computerised models, for the queues on Sevenoaks Road leading to the war memorial roundabout:

2.3 on Friday 08.00 to 09.00

2.4 on Friday 17.00 to 18.00

1.7 on Saturday 11.00 to 12.00

Those figures simply do not accord with reality on any normal day, or even on those days at the quietest times of the year. Photographs supporting the contention that the above numbers, and others in the Traffic Assessment, substantially underestimate the existing traffic queues are given in a separate document.

THEREFORE OUR CONCLUSIONS ARE THAT THE TRAFFIC DATA THAT WAS COLLECTED WAS WRONGLY DETERMINED OR THERE ARE SOME MAJOR DEFECTS IN THE COMPUTERISED DATABASES OR MODELS BEING USED. THE MODELS USED NEED TO BE FULLY VALIDATED TO ENSURE THEY ARE ACCURATE.

Note that we understand it is the intention of OCPAG to provide more data on existing traffic conditions and a more accurate independent Traffic Assessment at a later date. We submit that no decision should be taken on this planning application until that evidence has been submitted.

7. Summary. In conclusion, we suggest that the Traffic Assessment provided for this development is defective and underestimates the likely additional traffic congestion that will result.

Traffic queues and periods of stationery or near-stationery traffic on the road past the development and on those roads linking to the war memorial roundabout will be made worse. This will result in adverse effects on air pollution in those roads and will also cause diversion of traffic into adjacent residential streets, thus causing problems with pollution and noise in those roads.