Crosby Transport Planning Limited
Willow House
Forest Close
East Horsley
Surrey KT24 5BU
T: 01483 282560
E: contact@crosbytp.com
W: www.crosbytp.com

TRANSPORT TECHNICAL NOTE

THINKPAD HOUSE, 155A MAIN ROAD, BIGGIN HILL, TN16 3JP

Prepared on behalf of Empiric Estates Ltd

December 2023

Reference: P23149 TN/PC

Introduction

1 This Transport Technical Note is prepared on behalf of Empiric Estates Ltd (the "Applicant") in relation to their Prior Approval application for a change of use of Thinkpad House at 155A Main Road, Biggin Hill, TN16 3JP, situated within the London Borough of Bromley (LB Bromley).

2 The application relates to a change of use of the entirety of Thinkpad House from 131sqm GIA (1,410sqft) of Class E (commercial, business and service) use to 3 x residential studio flats under Class MA of the current Permitted Development rights (reference *'Statutory Instruments, 2015 No. 596, The Town and Country Planning (General Permitted Development) (England)* as amended (the GPDO).

3 Class MA of the GPDO (paragraph W.5), requires the local authority to consider whether "*the development is likely to result in a material increase or a material change in the character of traffic in the vicinity of the site".* If the local authority considers this to be the case, paragraph W.5(b) states that they must consult "*the local highway authority, where the increase or change relates to traffic entering or leaving a classified road or proposed highway, except where the local planning authority is the local highway authority*".

4 Paragraph W.10 stipulates that the local authority must, when determining an application for Prior Approval, have regard to the National Planning Policy Framework (NPPF) so far as is relevant to the subject matter of the prior approval, as if the application were a planning application.

5 Paragraph 111 of the NPPF 2023 states "*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*".

6 This report considers the potential transport and highways implications of the scheme, including accessibility, parking provision and traffic generation in order to assist LB Bromley in their determination of whether *"the development is likely to result in a material increase or a material change in the character of traffic in the vicinity of the site".*

7 It is noted that a previous Class MA Prior Approval application (LB Bromley planning reference DC/23/03668/CUETC3) was refused in November 2023 partly on highways grounds. The relevant reason for refusal stated "*Insufficient information has been provided as part of the application to allow the Council to properly assess the potential highways impacts of the scheme, therefore the Council cannot be certain that the proposal will be able to provide suitable access and that it would not create conditions that would be prejudicial to highway safety*."

8 The previous application proposed the inclusion of three car parking spaces on site although the planning officer determined that insufficient information had been provided to demonstrate how these spaces could be accessed safely.

9 The revised application that is the subject of this Transport Technical Note is for a similar change of use to three studio units, but with the provision of no car parking spaces on site.

10 The first section of this report describes the scheme in terms of transport and highways matters, with the second section setting out the findings of a parking stress survey which the Applicant has commissioned.

SECTION 1: TRANSPORT AND HIGHWAYS

Site Location and Accessibility

11 The application site is located within Biggin Hill, along the eastern side of Main Road (classified 'A233'), on the corner of its junction with Kingsmead.

12 Main Road runs in a north–south direction and provides a direct route to Biggin Hill Airport to the north. To the south it provides a route towards Westerham. Within Biggin Hill it serves as direct access to a mix of high street shops and residential development and residential side roads (e.g. Kingsmead).

13 In the vicinity of the site, Main Road is a single carriageway two-way road with a 30mph speed limit and regular streetlighting columns provided. There are no formal car parking restrictions on either side of Main Road, except for double yellow line markings at its junction with Kingsmead.

14 The location of the site in the context of the local highway network is shown in **Figure 1** below.

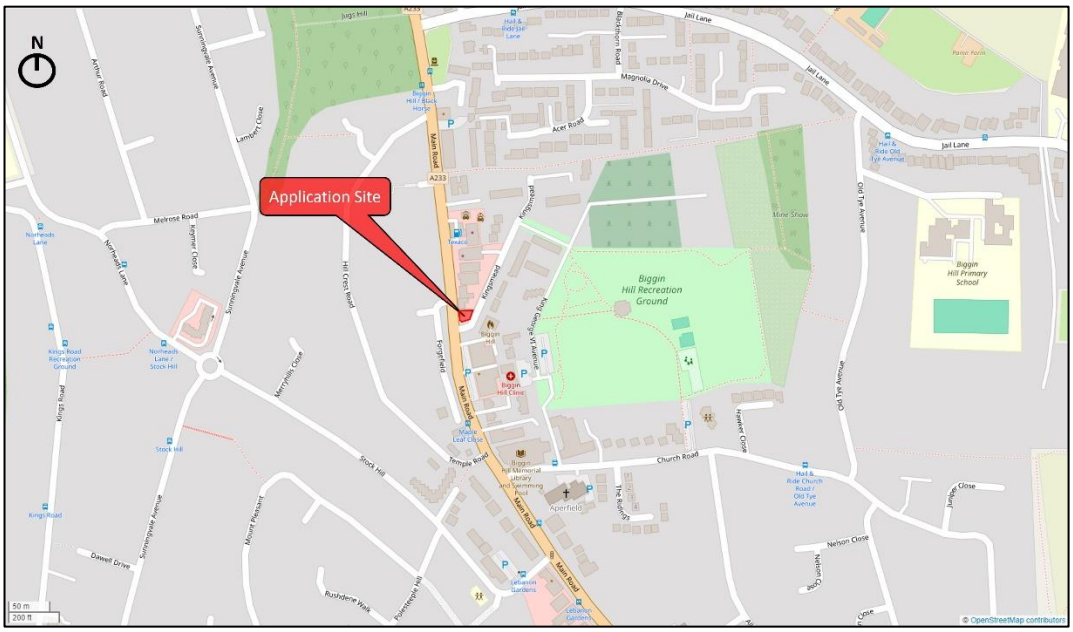


Figure 1: Local Highway Network

15 The site itself forms a corner plot at the junction of Main Road with Kingsmead and is occupied by a two-storey with lower ground floor detached building in class E (commercial, business and service) use but now vacant.

16 A small amount of hardstanding to the building's frontages on Main Road and Kingsmead and the gap between the neighbouring property provides open storage for refuse bins. Pedestrian entrances to the building are provided on both its Main Road and Kingsmead sides. The site is car-free and a small courtyard garden is located around the building's corner frontage with Main Road / Kingsmead.

Public Transport Accessibility

17 With reference to TfL's online Planning Information Database, the site scores a PTAL rating of 2 which equates to a 'poor' level of public transport accessibility. The output from the TfL website is shown in **Figure 2** below.

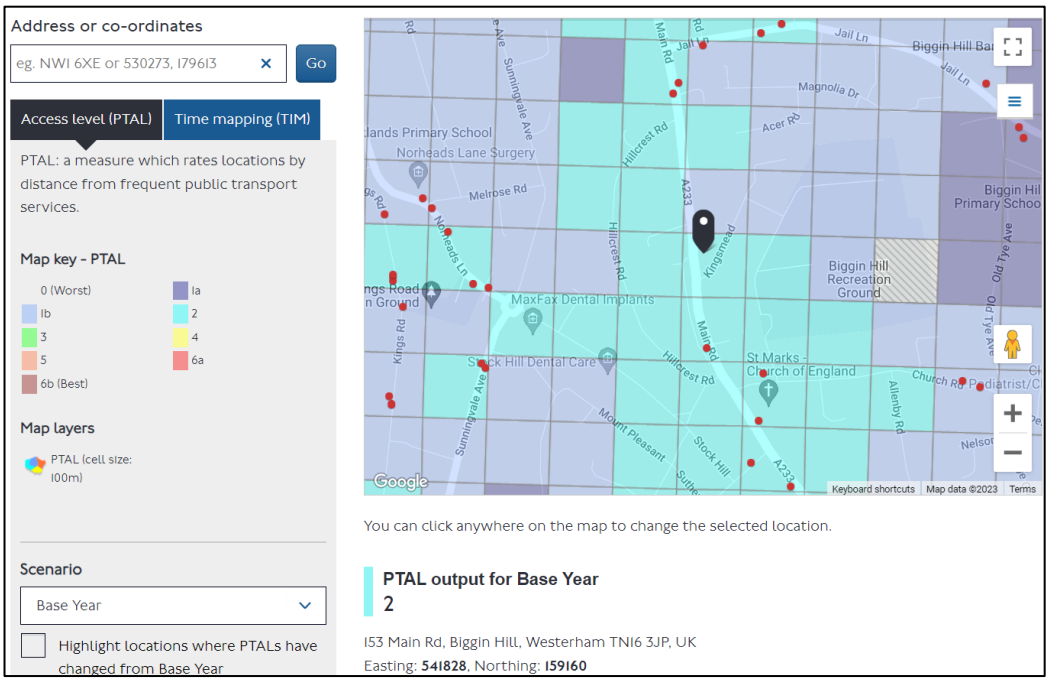


Figure 2: PTAL Mapping (Source: www.tfl.gov.uk)

Bus Services

18 The nearest bus stops to the site are located along Main Road to the south of the site (TfL stop references W and N) frequented by the 246, 320, 464, R2 and R8 bus services, within a 135m-270m walk distance to the south of the site.

19 **Table 1** below presents a summary of the five daily bus routes operating within the vicinity of the site and the destinations served.

Service	TfL Stop Reference (walk distance)	Route Towards	Frequency (minutes)		
			Weekday	Saturday	Sunday
246	W (145m)	Bromley North Station	30	30	60
	N (270m)	Westerham Green	30	30	60
320	W (145m)	Catford Bridge Station	10-13	9-13	15-20
	N (270m)	Biggin Hill Valley	10-12	10-12	20
464	W (145m)	New Addington	30	30	60
	N (270m)	Tatsfield	30	30	60
R2	W (145m)	Orpington	30	30	n/a
	N (270m)	East Hill	30	30	n/a
R8	W (145m)	Orpington	80-90	80-90	n/a
	n/a	n/a (Route begins in Biggin Hill)	n/a	n/a	n/a

Table 1: Summary of Bus Routes Serving the Site

20 Table 1 shows that the site benefits from access to five frequent daily bus services, including three that operate 7 days per week. It is evident therefore that in terms of the quantity and frequency of service provision, there are no demonstrable barriers to bus travel to/from the site.

Walking and Cycling

21 The site is located in an established urban area surrounded by residential, commercial and retail uses and within the vicinity of key public transport nodes. The site therefore benefits from the extensive pedestrian infrastructure present in the locality. There are few barriers to walking, with generous width footways, dropped kerbs and adequate street lighting along Main Road and local roads.

22 There is a signalised pedestrian crossing on Main Road located approximately 190 metres walk distance to the south of the site (adjacent to the Biggin Hill Library & Swimming Pool). Additional signalised pedestrian crossings are located at the Main Road / Lebanon Gardens junction approximately 100 metres further south. A zebra crossing is located approximately 170 metres further south of the Main Road / Lebanon Gardens junction.

23 Cycling is a mode of travel that residents of the development may well choose to adopt in this location. There are no dedicated formal cycle routes in the vicinity of the site. However Main Road, which is subject to a 30mph speed limit and is a minimum of 6 metres wide in the vicinity of the site, provides a safe environment that encourages safe on-carriageway cycling.

24 It is therefore considered that non-car modes of travel, including walking, cycling and public transport services, would be feasible alternatives to the use of a car for future residents at the site going about their typical day-to-day activities.

Proposals

25 The change of use comprises the conversion of 131sqm GIA (1,410sqft) of Class E (commercial, business and service) use to 3 x studio residential flats. The site layout and proposed floor plans are shown within the submission drawings which accompany the application.

26 There are presently no formal cycle parking spaces on site. For Prior Approval applications, it is established that the provision of cycle parking relates to convenience only, rather than an impact on transport and highways. However, the Applicant recognises the importance of encouraging residents to cycle and therefore a communal area for secure cycle parking with capacity for 3 bicycles (noting the London Plan 2021 standard for 1-bedroom 1-person units is 1 space/unit).

27 A refuse storage area to the front of the building will be provided in keeping with the arrangements for the existing use. For the refused scheme, the planning officer stated within the Delegated Decision Notice, "*The refuse storage is shown to the front of the building which is acceptable in principle from a collection viewpoint*".

28 Details of the refuse and recycling bin storage arrangements are shown within the submission drawings.

29 It is not expected that the residential development will generate a significant number of service vehicle movements and most likely less than the former commercial use. Occasional deliveries will be able to continue to take place in accordance with existing traffic regulations. Overall, it is considered that the servicing and refuse collection arrangements will remain largely unaffected by the change of use.

Development Traffic Generation and Impact

30 Class MA of the GPDO (paragraph W.5), requires the local authority to consider whether "*the development is likely to result in a material increase or a material change in the character of traffic in the vicinity of the site*".

31 As the proposed three units will effectively be car-free and within an accessible location, they will be likely to attract little in the way of vehicular movements as there would be a strong presumption against driving to and from the site.

32 In order to determine the likely change in the number of vehicle trips, it would be typical to undertake a TRICS analysis of the existing and proposed uses. However in this case, by virtue of the proposed scheme being car-free and the small scale of both the existing and proposed uses, it is evident that there would be negligible adverse impact in terms of traffic movements.

33 The former business use would have been likely to attract some car trips by visitors, who could park within the surrounding streets, as well as deliveries typically associated with office development. Staff may well also have chosen to drive to work on occasions and park within the local streets.

34 For the proposed residential use, it is considered unlikely that residents will choose to own a car and this is discussed further within the following section. Occasional visitors to the residential development could choose to drive by car and would be able to park within the surrounding streets, although such a number would be highly unlikely to be greater than for the former use.

35 In terms of trip generation therefore, it is considered that the change of use to a residential development would cause no detriment to the local highway network.

36 The remainder of this report assesses the potential impact on on-street car parking levels arising from the Permitted Development use.

SECTION 2: CAR PARKING

37 Whilst the application of standards and development plan policies is not a Class MA consideration as it does not demonstrate or substantiate an impact in respect of transport and highways matters, it is noted that Part B of Policy T6 of the London Plan 2021 states that "*car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite')*".

38 The application site scores a PTAL of 2 which is considered to be 'poor', although it has been demonstrated that the site is accessible by five local bus routes and is located in close proximity to high street shops & services that can be reached using good quality pedestrian infrastructure provided along Main Road.

39 For sites with 1-2 bedrooms within Outer London with a PTAL of 2, the London Plan car parking standard is "*up to 0.75 spaces per dwelling*". On the basis that the three proposed units will be studios rather than larger 1-bed or 2-bed units, we can reasonably expect the total parking demand to be towards the lower end of this range.

Existing On-Street Parking

40 Existing on-street parking occupancy levels, or 'stress', in streets surrounding the application site have been assessed by undertaking manual parking surveys.

41 The parking surveys have been undertaken in accordance with the 2021 '*Lambeth Council Parking Survey Guidance Note*'. Lambeth Council's parking survey methodology is the most established guidance document for parking studies within London.

Survey Design – Time Period

42 In accordance with section 2 of the guidance, a parking survey for a residential development should be undertaken on a weekday, overnight between 00:30hrs and 05:30hrs, as this is generally the time period when residential parking is at its highest as the highest number of residents will be at home.

43 Accordingly, the overnight surveys for this assessment were undertaken on the morning of Wednesday 6 December 2023 and Thursday 7 December 2023 at 01:00hrs and 00:45hrs respectively.

Survey Design – Study Area

44 The parking survey guidance advises that a survey area should cover streets within a 200m walking distance of a point of interest, as this is the distance most residents would wish to park within. Where the 200m boundary occurs part-way along a street, the survey area should be shortened or extended to the nearest junction. Common sense should be applied in all cases when considering the extent of the survey area. The extent of the commissioned survey area is shown in **Figure 3** below.

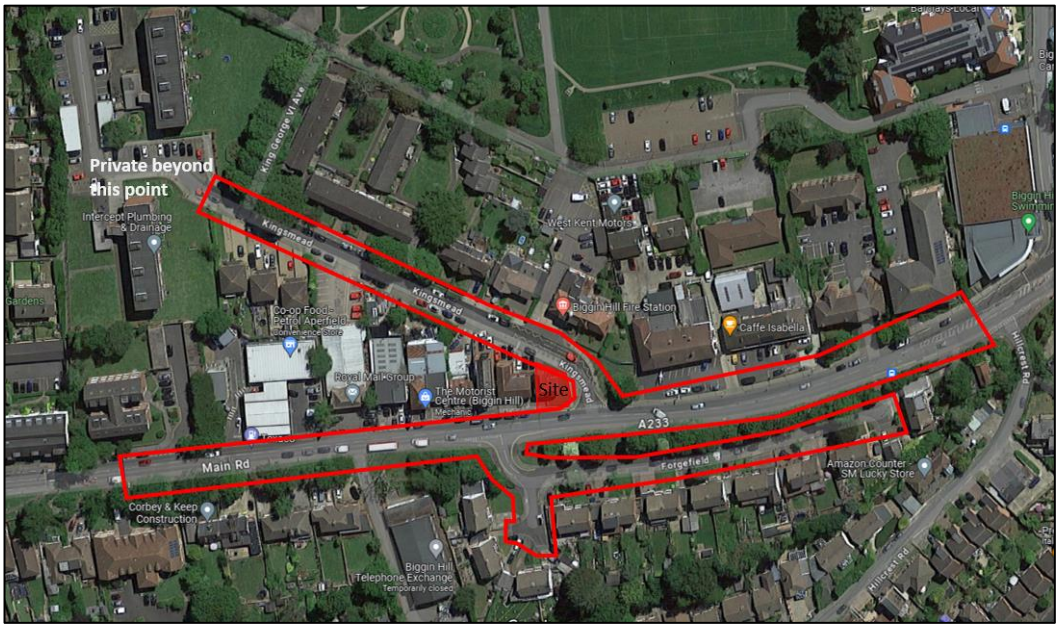


Figure 3: Parking Stress Survey Area

45 The focus of the survey area is the length of Main Road within circa 160m in each direction of the site as well as Forgefield and Kingsmead.

46 The site and surrounding streets within the study area are not located within a Controlled Parking Zone (CPZ) although there are a number of parking restrictions within the area to ensure the freeflow of traffic. Along Main Road, unrestricted kerbside parking is possible along the eastern side of the carriageway in unmarked bays. Along the western side of Main Road unrestricted parking is possible although it is evident that drivers do not tend to park along this side of the carriageway. Therefore, the western side of Main Road was not considered as having unrestricted parking availability.

47 Unrestricted parking is possible between driveways along Forgefield but parking does not take place along the eastern side due to the narrowness of the road. Unrestricted parking is available along Kingsmead in the form of kerbside and permitted footway parking.

48 Where unrestricted parking is not provided, double yellow lines are in place. Parking elsewhere within the study area is controlled by way of dropped kerns and driveway accesses. Also within the study area there are two kerbside disabled parking bays along Kingsmead.

49 The numbers of parking spaces in the survey area were identified as part of the analysis. For the purposes of calculating parking stress as defined by the guidance document, it is assumed that each vehicle takes up an average kerb space of 5.0 metres. Therefore, where a minimum length of 5.0 metres was observed, this was counted as an available parking space. Any lengths of space less than 5.0 metres were not regarded as a parking space. All vehicle crossovers and dropped kerbs were measured on-site and eliminated from available kerb space, in accordance with guidance.

50 Any lengths of road where it was observed that the width was too narrow for parking to occur on both sides without leading to cars blocking the road, parking availability was excluded from one side as observed.

Survey Results and Analysis

51 The complete parking survey findings are presented in **Appendix A**, which show that the study area includes a potential for 64 unrestricted spaces that could be used by residents throughout the day and overnight.

52 In terms of parking occupancy, or 'stress', the survey results for the unrestricted spaces within study area are summarised below in **Table 2**.

Street Name	Wednesday 6 December 2023			Thursday 7 December 2023			Average		
	Spaces	Observed Parked	% Stress	Spaces	Observed Parked	% Stress	Spaces	Observed Parked	% Stress
Main Road	25	9	36.0%	25	7	280%	25	8	32.0%
Forgefield	16	16	100%	16	15	93.8%	16	15.5	96.9%
Kingsmead	23	19	82.6%	23	16	69.6%	23	17.5	76.1%
TOTAL	**64**	**44**	**68.8%**	**64**	**40**	**62.5%**	**64**	**42**	**65.6%**

Table 2: Parking Stress Survey Results – Unrestricted Spaces

53 The survey results show a total parking demand of 40-44 vehicles within the unrestricted spaces within the study area. This equates to a total stress level for the surveyed area of 65.6%**.**

54 What constitutes a level of 'high parking stress' is not well defined in published guidance however stress levels of greater than 85%-90% are typically deemed by councils to be 'high'. It can therefore be concluded that the existing parking stress levels surrounding the application site are not high.

55 The Lambeth Methodology requires a separate note to be made of any areas where cars can park legally overnight but not 24 hours/day. Within the study area, there are no such areas. Both disabled bays were occupied on both nights and one car was observed parked across a dropped kerb which can be assumed to be associated with the adjacent householder.

Development Parking Demand

56 The Lambeth Methodology advises that an assessment of the likely car ownership of future occupants should be undertaken to understand the scale of any overspill parking arising from the development.

57 In order to determine the possible car ownership of the development and hence the potential net impact on the surrounding streets, it is typical to use the latest available car ownership levels from the 2011 Census for the local area (noting that multivariate data is not yet available for the 2021 Census). The data provides existing levels of car ownership by habitable room for defined area wards, broken down by unit size and tenure type. This is in accordance with the Lambeth Methodology which states *"an assessment of likely car ownership of future occupants can be undertaken to understand the scale of any overspill parking."*

58 In this case the data for the local ward of Church End, within which the development site is located, has been reviewed. **Table 3** below contains the data derived directly from the most recently available 2011 Census which is based upon the number of habitable rooms. In the case of the proposed development, all three units will have no greater than one habitable room.

Area	Unit Type	No. Habitable Rooms	No. H/holds	No. H/holds – No cars or van	No. H/holds – 1 car or van	No. H/holds – 2 cars or van	No. H/holds – 3 or more cars or van	Total cars owned	Average cars per dwelling
Biggin Hill ward	Flat: Total Tenure	1 – 3 rooms	187	73	98	16	0	130	0.695

Table 3: 2011 Car Ownership Census data

59 For the proposed scheme, it can be established that the possible car ownership would be circa 2 vehicles (i.e. 0.695 x 3). It is noticeable from the data that some 39% of such units are car-free, which further emphasises the propensity for residents in this area to be able to live car-free.

60 Based upon both the London Plan 2021 standards and the local Census data, it is therefore reasonable to assume for the purposes of a sensitivity test that the proposed scheme may result in an increase in overnight parking demand of up to 2 vehicles.

Nearby Consented Developments

61 In accordance with the Lambeth Methodology, a review of local, recently consented development has been undertaken in order to take into account any potential cumulative parking demand arising from forthcoming development in the area.

62 Whilst there has been a small number of property extensions and conversions granted by LB Bromley, there are no developments that are considered to have any significant parking implications within the surrounding area.

63 The adjacent building at 155 Main Road received approval for a similar application in xxx (LB Bromley planning reference 23/01314). The application site is inclusive of 3 car parking spaces and so the parking demands of the change of use are considered to be fully accommodated off-street.

On-Street Parking with Development

64 **Table 4** below summarises the future on-street parking stress projection of the study area taking into account the additional demand of up to two spaces as a result of the Prior Approval scheme.

	SURVEY DAY 1			SURVEY DAY 2			AVERAGED		
	Spaces	Parked	Stress	Spaces	Parked	Stress	Spaces	Parked	Stress
6/7 Dec. 2023 Surveys	64	44	68.8%	64	40	62.5%	64	42	65.6%
With Development	64	46	71.9%	64	42	65.6%	64	44	68.8%

Table 4: Assessment of Potential Parking Impact with Proposed Scheme

65 On the basis that the proposed scheme could lead to up to two additional cars parked on the surrounding roads overnight, the level of parking stress within the local study area would increase from 65.6% to 68.8%.

Summary and Conclusions

66 Paragraph 111 of the NPPF 2023 states "*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"*.

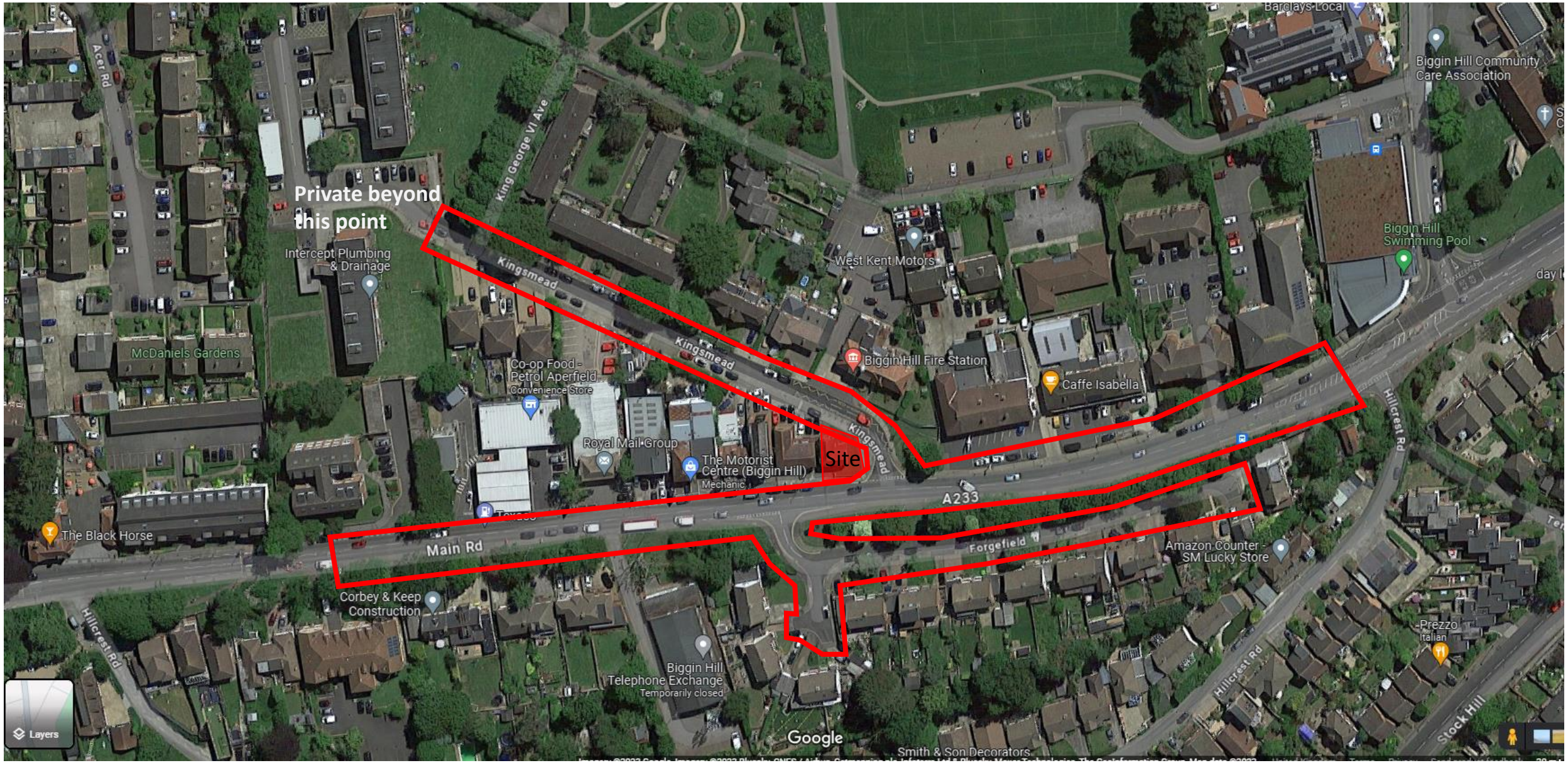
67 The scheme would provide cycle parking in accordance with locally-adopted standards and refuse collections would remain in accordance with previously agreed arrangements.

68 Having used the preferred Lambeth Methodology to determine the existing baseline and then considered the possible overspill parking demand resulting from the proposed scheme, the overall parking stress on roads within the vicinity of the site would increase from 65.6% to 68.8%, still below the 'high' 85%-90% threshold.

69 Based on the findings of the analysis it is considered that the streets surrounding the site do not have a high level of parking stress cumulatively, and it is considered that the proposed scheme would lead to a minimal impact on parking levels, with excess availability remaining.

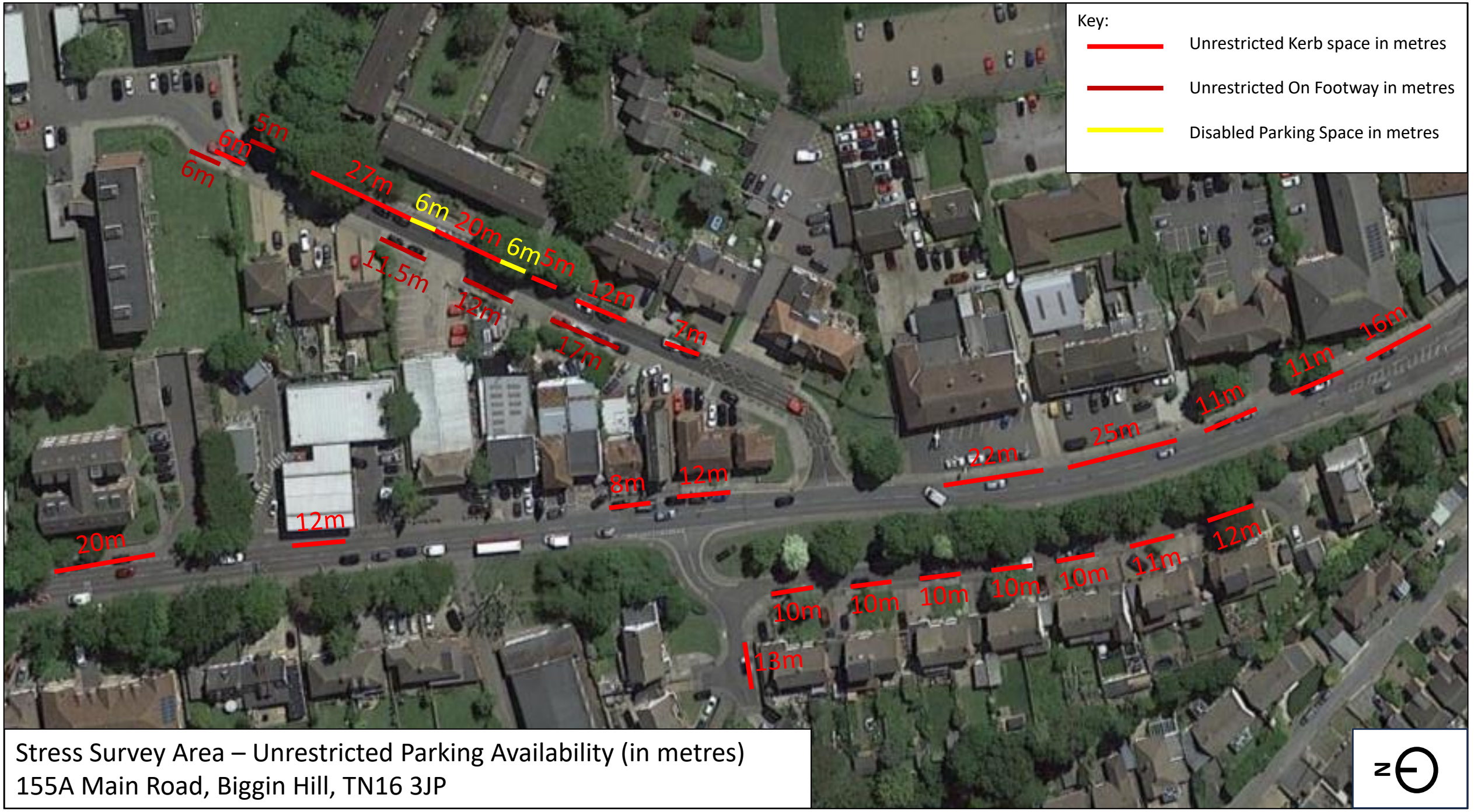
70 This note has therefore set out the potential implications of the proposed change of use in terms of highways and parking matters, and based upon clear empirical evidence and established methodology, it is concluded that the car-free proposal would not give rise to a *'material increase or a material change in the character of traffic in the vicinity of the site'* and would not create conditions that would be prejudicial to highway safety.

APPENDIX A:
Parking Stress Survey



Extent of Stress Survey Area (Map Source: Google Maps)

155A Main Road, Biggin Hill, TN16 3JP



Stress Survey Area – Unrestricted Parking Availability (in metres)
155A Main Road, Biggin Hill, TN16 3JP


Key:
Parked Vehicle (Unrestricted Kerb)
Parked Vehicle (Unrestricted on Footway)
Observed Car Parking Space
Parked Vehicle (Disabled Space)
Observed Car Parking Space (Disabled Space)
Parked Vehicle (Not a Space)
King George VI Ave
Peatswood
Kingsmead
Biggin Hill Fire Station
West Kent Motors
Caffe Isabella
Sam's Barber Shop & Tattoo studio
Intercept Plumbing & Drainage
Co-op Food - Petrol Aperfield
Convenience Store
Texaco
Royal Mail Group
The Motorist Centre (Biggin Hill)
Mechanic
A233
Forgefield
Amazon Counter - Lucky Store
Decorators
Stress Survey Results: Wednesday 6 December 2023 – 01:00hrs
155A Main Road, Biggin Hill, TN16 3JP


Key:
Parked Vehicle (Unrestricted Kerb)
Parked Vehicle (Unrestricted on Footway)
Observed Car Parking Space
Parked Vehicle (Disabled Space)
Observed Car Parking Space (Disabled Space)
Parked Vehicle (Not a Space)
King George VI Ave
Peatswood
Kingsmead
Biggin Hill Fire Station
West Kent Motors
Caffe Isabella
Sam's Barber Shop & Tattoo studio
Intercept Plumbing & Drainage
Co-op Food - Petrol Aperfield
Convenience Store
Texaco
Royal Mail Group
The Motorist Centre (Biggin Hill)
Mechanic
A233
Pergefield
Decorators
Amazon Counter - Lucky Store
Stress Survey Results: Thursday 7 December 2023 – 00:45hrs
155A Main Road, Biggin Hill, TN16 3JP

DATE: 6 AND 7 DECEMBER 2023

DAY: WEDNESDAY & THURSDAY

LOCATION : 155A MAIN ROAD, BIGGIN HILL, TN16 3JP

					WEDNESDAY 6 DECEMBER 2023 TIME : 01:00			THURSDAY 7 DECEMBER 2023 TIME : 00:45		
ROAD NAME	ZONE	RESTRICTION	METRES	SPACES (5.0M)	OBSERVED PARKED	OBSERVED SPACES	%RESTRICTION STRESS	OBSERVED PARKED	OBSERVED SPACES	%RESTRICTION STRESS
Main Road	1	DOUBLE YELLOW LINE								
		UNRESTRICTED KERBSIDE	137	25	9	16	36.0%	7	18	28.0%
		DROPPED KERB / DRIVEWAY								
		UNRESTRICTED BUT WOULD NOT PARK								
		BUS STOP								
Forgefield	2	DOUBLE YELLOW LINE								
		UNRESTRICTED KERBSIDE	86	16	16	0	100.0%	15	1	93.8%
		DROPPED KERB / DRIVEWAY								
		UNRESTRICTED BUT WOULD NOT PARK								
Kingsmead	3	DOUBLE YELLOW LINE								
		UNRESTRICTED KERBSIDE	77	14	11	3	78.6%	10	3	71.4%
		UNRESTRICTED ON FOOTWAY	51.5	9	8	2	88.9%	6	3	66.7%
		DISABLED BAY	12	2	2	0	83.3%	2	0	83.3%
		DROPPED KERB / DRIVEWAY						1		
		UNRESTRICTED BUT WOULD NOT PARK								
TOTAL		UNRESTRICTED	312	64	44	21	68.8%	40	25	62.5%