



Our ref: 15/5061

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www.TfL.gov.uk

9 March 2016

Dear ██████

**St Dunstan's College, Stanstead Road, London Borough of Lewisham –
TfL pre-application advice letter**

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority (GLA).

Firstly, I would take this opportunity to thank you for taking advantage of the TfL pre-application service, the aim of which is to ensure that development is successful in transport terms and in accordance with relevant London Plan policies. This letter follows the pre-application meeting, held on 26 January 2016, to discuss the development proposals and further information provided subsequent to the meeting via email on 24 February 2016.

General

The Transport Assessment (TA) report to be produced by the applicant as part of the planning application submission should be in line with TfL's Transport Assessment guidance available at:

<https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>

TfL will continue to provide transport technical advice through the pre-application stage and will welcome the opportunity to provide further pre-application advice on specific matters, as and when appropriate. The applicant should note that if further meetings are required they might need to pay a follow up pre-app fee.

Table 1 set outs the attendees at the meeting on 26 January. Following the meeting, the case material has been circulated to other TfL staff and colleagues from Lewisham Council.

Table 1: Meeting Attendees

Attendee	Organisation
Rob Goodall	Borough Planning (Case Officer)
Anne Crane	Borough Planning
Peter Tonkin	Bus Priority
Priya Floyd	Growth Areas
Hoa Vong	London Borough of Lewisham
██████████	Renew Planning (Planning Consultant)
██████████	Campbell Reith (Transport Consultant)
██████████	AMR Consult (Project Manager)
Apologies	
Aidan Daly	TfL Buses
Rebecca Fullager	Road Space Management
Suzanne White	London Borough of Lewisham

Principle of Development

Currently, the site is occupied by school playing fields and is designated as Urban Green Space. We understand that Lewisham Council's policy position on development on Urban Green space is that it is inappropriate. This letter provides advice on the assumption that this policy issue can be successfully overcome and that the principle of development of Urban Green Space, namely the playing fields is acceptable. It would appear that from the plans provided the proposed development would breach the 2,500m² threshold for development on Urban Green space and would therefore be referable to the Mayor (of London) and as such TfL would as well as being a statutory consultee on any eventual application would provide strategic transport advice to the Mayor.

As discussed at the pre-application meeting and in correspondence subsequently, TfL is very concerned about allowing proposals which could have the effect of encouraging or making it easier for parents and/or carers to drive pupils of all ages to and from the school. The proposals may also have the effect of increasing the number of staff who drive, either by freeing up the existing crescent for more parking, or possibly additional parking being provided in the area where the existing buildings will be demolished or through there being less congestion around the access to staff parking.

The school is located in an area with very good public transport and also having existing vehicular drop-off facilities, which many other similar schools in London do not have. As mentioned in the meeting, two comparative local schools have no off-street space for vehicular drop-off and pick-up and only limited staff parking.

It is understood that the applicant is concerned about the existing arrangements on site and that the aspirations to provide a newly designed, dedicated drop-off facility for younger pupils at the proposed junior school have been developed in order to address safety concerns. However, TfL is of the opinion that any proposed development or facility that leads to an increase in vehicular movements to and from the site, which will likely impact upon the general operation and safety of the Transport for London Road Network (TLRN) and the bus network, will be opposed in the strongest possible terms. It would have similar impacts upon borough highways.

Site Context and Conditions

The site is located on the South Circular, A205 Stanstead Road, which forms an important part of the TLRN. TfL is the highway authority responsible for the TLRN and any amendments to TLRN roads require the approval and consent of TfL. The A205 is heavily trafficked at peak periods during the morning and evening and the section of road outside of the college has been frequently observed as having significant queuing traffic back from the A205 Stanstead Road / Catford Hill signalised junction towards Forest Hill at off-peak as well as peak times.

Catford and Catford Bridge stations are both located to the north east and within 500m walking distance from the centre of the site. These stations provide frequent services north into Cannon Street, Charing Cross and London Bridge stations and south to Sevenoaks, Beckenham and Bromley South stations. There are also a large number of bus routes available from stops in the vicinity of Catford station and on Catford Hill. Additionally, the 171 and the 185 both run along the A205, with stops immediate outside of the site, which provide routes between Lewisham / London Victoria station and Catford / Holborn. The 185 bus route terminates and commences service from the stand and stops on Greenwood Road opposite the school. At the signalised junction of the A205 and Greenwood Road, there is a bus gate provided in order for buses using the bus lane on the A205 to bypass congestion along this stretch of road.

As such, the site currently records a very good Public Transport Accessibility Level (PTAL) of 5, on a scale of 1-6, where 1 is poor and 6 is excellent.

Vehicular access and egress to the school is currently provided directly from the A205 opposite the signalised junction with Greenwood Road and the bus stand. This access and egress point forms a crescent, where informal parking and uncontrolled pick-up and drop-off occurs. From the crescent, authorised vehicles can access staff car parking further into the site and access is also provided to the rest of the school for servicing and deliveries. In the past TfL has received complaints from local residents and other users of the A205 about vehicles using the crescent. These complaints have described scenarios where vehicles entering the crescent often extend beyond the right turn pocket

that is provided and as a result they block westbound traffic on the A205. Additionally, vehicles seeking to exit the crescent tend to undertake this turning movement when the signals turn red for the A205; however, there is such a high number of vehicles often end up blocking the eastbound traffic lane when the signals turn green, further exacerbating the existing congestion issues that are consistently observed and impacts on bus journey time and reliability.

There is also an existing vehicular access to the school playing field, further east along the A205, which was formalised and enlarged as part of a previous planning application in 2008. This vehicular access is approximately 6m wide. It is understood that this entrance is used for infrequent maintenance access and one-off events held on the playing fields (such as the summer fete) and can not be used more often, as the access is directly onto the grass playing fields and there is no surfacing suitable for vehicles to be driven along or park.

Development Overview

At the time of the pre-application meeting, the proposed development comprised the re-provision and construction of new junior school building (including at least 15 classrooms and associated ancillary space) within the school playing fields to replace the temporary classrooms currently on site and the provision of a new vehicular drop-off and pick-up arrangement. Drawings were provided by the applicant at the meeting showing the proposed vehicle access arrangements and site layout.

The original proposals sought to widen the maintenance entrance to provide access to the proposed new vehicular drop-off/pick-up facility. During the pre-application meeting TfL raised a number of concerns about the entrance's location. These concerns related to the bus stop directly opposite and how this bus stop may be impacted by vehicular traffic turning right into the access from the westbound A205 and vehicles exiting the site and turning right across the bus stop.

Subsequent to the initial pre-application meeting, and following advice provided at the meeting, new and updated drawings were provided by the applicant on 24 February showing two new vehicular access options. The first option comprised slight amendments to the original proposals, including moving the location of the proposed access point and the second option involving a re-design of the proposals, including the movement of the proposed access point and further works to the school access crescent to potentially remove an existing access point to create a one-way loop. Therefore, the advice set out in this letter relates to the two new options provided subsequent to the meeting. From the drawings provided subsequent to the meeting it would appear that the proposals now are for an additional 30 classrooms and associated facilities within a new two storey building.

Approach to Transport Assessment

Any planning application that comes forward for the proposed development would need to be supported by a full TA due to the sensitivity of the A205 as an important vehicular and public transport corridor.

The TA should contain an assessment of the impact of the development in line with TfL's best practice guidance, which can be found on the TfL website as referenced earlier in this letter. The following sections set out our view of the development proposals and what should be included within the TA.

Site Access and Impact on A205

The existing site access arrangements and proposals to access the proposed development have been briefly described above. We have also raised the issue of the acceptability in principle of the development, which would encourage car use as opposed to more sustainable forms of travel and result in an increase in the number of trips by private car and a shift in mode share. A number of concerns have been raised regarding the potential impact of the proposed access arrangements and the consequent increased vehicle activity on this extremely congested section of the A205, and these are discussed in detail below.

Option 1 – Two-way access with existing crescent access retained

The major concerns with both of the proposed options are focussed on the impact of right turning traffic into the new access point from the westbound carriageway of the A205. The potential impact of this movement is further magnified in Option 1 as a result of vehicles that will also be turning right out of the access across the traffic flow on the eastbound A205 and into the westbound carriageway.

The westbound traffic turning right into the new access would block the A205 whilst waiting for a gap in eastbound traffic. Despite the road being heavily congested at peak times in particular which can result in stationary traffic, these proposals are still likely to increase delay along this section of the A205. This delay is also likely to affect bus reliability and journey times in the area.

Vehicles exiting the school and turning left would be turning into an eastbound queue. As a result, it is possible that vehicles will 'edge out' blocking eastbound traffic (both general traffic and the bus lane). This is especially true of those vehicles that are turning right into the westbound carriageway, due to restricted visibility from queuing traffic.

TfL is also concerned that congestion and queueing from within the school grounds could back up onto the A205 and exacerbate congestion issues that are already occurring. As such, TfL are strongly opposed to the introduction of a new, intensively used two-way vehicular access point in conjunction with retaining the existing access points. TfL would recommend refusal of planning permission on the basis of an application submitted including Option 1.

Option 2 – One-way access loop with existing crescent access point closed

A number of the same concerns highlighted for Option 1 are also applicable to Option 2, specifically the issues from right turning traffic into the access from the westbound carriageway on the A205.

Currently, the existing crescent access benefits from a right turn pocket where vehicles turning right into the school can wait without blocking A205 traffic. Furthermore, they turn ahead of signalised stop line, which gives them opportunities to turn across eastbound traffic when they are held at the signals. The removal of the existing access point into the crescent as set out in the second option would result in both of these features being lost. That being said, the removal of this access point so close to the signalised junction may have the beneficial impact of reducing the conflicting movements in this location and may provide more space for any potential future improvement schemes.

Option 2 is an improvement on Option 1, however, as detailed above there are a number of concerns with the proposal. TfL requests to see a Stage 1 Safety Audit undertaken on the designs for the proposed new access point on the A205 before it can comment further on the one-way option. This audit should consider the visibility for entering/exiting vehicles during peak times. Furthermore, further assessment will need to be undertaken to quantify the impact on the A205, which is discussed below.

Additionally, the site access arrangements for walking and cycling will need to be detailed in full within the submitted application, including details of any changes or improvements needed to facilitate the access to the proposed development from the TLRN. As the preferred option (Option 2) would require the closure of the existing access, swept path diagrams will also need to be submitted as part of the TA to confirm that the largest vehicles likely to access the site can safely do so, including refuse vehicles, any articulated lorries and construction vehicles.

Highway Impact Assessment

In order to fully assess the development proposals, TfL would need to understand the likely demand of vehicles accessing and egressing the school during peak times (school and standard highway peaks) for the existing situation and for the proposed development. During the pre-application meeting, the applicant stated that the school is currently under capacity and

that the provision of the new junior school building is being proposed to facilitate bringing the school back up to capacity, albeit this should be justified especially given the large increase in the numbers of classrooms proposed. Therefore the traffic modelling should include a baseline current scenario and a future scenario which assumes the school at full capacity with and without the proposed development. A trip generation exercise based upon existing surveys of the school and factored to assume full attendance in either scenario would need to be undertaken.

Subsequent to the trip generation assessment, the impact of these movements on the access points and on the A205 would need to be fully tested through detailed traffic modelling. The modelling should also test the potential impact upon bus journey times and movement along the bus lane. TfL would expect to be fully consulted on the trip generation assumptions and modelling inputs and approval given before undertaking the modelling exercise.

Pedestrian and Cycle Access

As discussed in the meeting, there were a number of concerns raised regarding the provision of pedestrian and cycle access into the school from the new access point. The TA would need to fully address these concerns and the design of the site access and layout should prioritise sustainable modes of travel.

Also discussed was the pedestrian environment in the vicinity of the school and the lack of dedicated infrastructure. Currently the footways around the school leading to Catford and the stations and the bus stops are very busy during peak times. If there is an increase in pupil numbers with the school reaching capacity, it is likely the existing situation will worsen. TfL would expect to see both a Pedestrian Environment Review System (PERS) audit to be undertaken between the school and local public transport hubs and additionally a Pedestrian Comfort Level (PCL) assessment undertaken on the footways adjacent to the site entrances (for the existing and future scenarios).

Depending on the outcome of this audit and assessment, TfL are likely to request contributions to identified potential improvements immediately adjacent to the school to provide more footway capacity and for potential schemes to improve the pedestrian environment on routes to the stations. There is also scope to contribute towards wayfinding at both the school and local stations in the form of Legible London signage.

Car Parking and Cycle Parking

It is understood that the proposals are a re-provision of existing buildings on site and therefore TfL would expect no additional car parking to be provided for staff.

For cycle parking, provision that meets the minimum standards in the London Plan 2015 is required. Final numbers of student, teacher and visitor cycle parking spaces will need to be identified in the TA and the location and type of these spaces will need to be carefully considered. TfL recommend that at least 5% of provision be suitable for larger models of cycle (or scooters). Attention should be paid to TfL's London Cycling Design Standards (LCDS) in designing the cycle parking on site.

Delivery and Servicing Planning

TfL would expect the TA to include a draft Delivery and Servicing Plan (DSP). The TA should provide detail about delivery and servicing arrangements (such as the site management and delivery points) and how this accords with best practice published by TfL, please see this link: <https://tfl.gov.uk/info-for/freight/planning/delivery-and-servicing-plans>.

Travel Plan

TfL would expect the School Travel Plan to be updated and provided with any application. This should set out measures to encourage mode shift from car use and parent/carer drop-off to other modes. The travel plan should set out targets and measures and there should be baseline mode of travel assessment as well as targets for one year, three years and five years. There need to be measures to discourage car use as well as positive measures to encourage walking and cycling. TfL guidance on Travel Plans can be found here: <https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans/the-travel-plan>. To reduce the need to travel by modes other than walking and cycling and to spread demand, TfL would also expect a School Travel Demand Management Plan be prepared to support the Travel Plan either as part of the Travel Plan or as a stand alone document. This document will need to address the potential increase in bus users as a result of the school operating at full capacity as currently local bus routes are exceptionally busy in the school afternoon peak. There should be measures set out within the Demand Management Plan to address these issues.

Phasing and Construction

A Construction Logistics Plan (CLP) will also be required, and while this should be secured by condition or S106 the TA should still contain some information on how construction impacts are intended to be dealt with, in order to minimise the potential impact on the A205. A CLP should include the likely construction trips generated and mitigation proposed. Details should include; site access arrangements, booking systems, phasing, vehicular routes and scope for load consolidation or modal shift in order to reduce the total number of road trips generated. Specific TfL advice can be found here: <https://tfl.gov.uk/info-for/freight/planning/construction-logistics-plans>.

Summary

A review of the TA and assessment of the impacts of the proposed development will determine the requirement for mitigation improvements, such as the upgrades to the pedestrian environment in the vicinity of the site, and the appropriate mechanism for securing these improvements will be discussed with the applicant.

In summary, there are a number of strategic issues which need to be adequately addressed as part of the submission for TfL.

- Stage 1 Safety Audit of the proposed vehicular entrance;
- Traffic modelling of the impact of the new access onto the A205 and likely increase in vehicular trip generation;
- Confirmation of pedestrian and cycling access to the site, connections to local infrastructure and contribution to potential improvements and wayfinding;
- Identification and confirmation of car and cycle parking numbers and locations;
- Demand management through Travel Plan, Construction Logistics Plans and Delivery and Servicing Plans.

If you have any queries, further questions or seek clarification please contact the case officer Rob Goodall [REDACTED] or myself.

[REDACTED]

Alex Williams
Director Borough Planning

[REDACTED]

[REDACTED]

Copy to:
All meeting attendees
Rebecca Fullager (Transport for London)
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