

**CHIPSTEAD
RESIDENTS'
ASSOCIATION**



**Response to;
Proposed Mixed-Use Redevelopment,
Lion Green Road, Coulsdon**

Planning Application 13/02178/P

On behalf of

CHIPSTEAD RESIDENTS' ASSOCIATION

AUGUST 2013

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1.0 INTRODUCTION

- 1.1** The Stilwell Partnership (**tsp**) has been appointed by Chipstead Residents' Association (CRA) to advise upon transportation issues arising from the Planning Application for a proposed Mixed-Use Redevelopment at Lion Green Road Car Park, Coulsdon (13/02178/P). **tsp** has already made formal representations on the EIA Scoping Study for Cane Hill and the Coulsdon Masterplan (Draft Feb 2013) and anticipates further involvement when Planning Applications are submitted later this year for Cane Hill and the Red Lion.
- 1.2** CRA has serious concerns that there is no evidence that full consideration has been given to overall traffic and transportation issues, and believes that the steps proposed on these matters, in so far as they relate to the Lion Green Road Planning Application, are fundamentally unsound. The proposals might have some features which would be beneficial for Coulsdon, but these do not outweigh the negatives.
- 1.3** There are already significant congestion problems in and around Coulsdon, giving rise to widespread "rat-running." These problems would be exacerbated by the three developments now proposed. The Transport Assessment (TA), undertaken by WSP UK Limited (WSP) in support of the Application, should have addressed this issue fully, but there is little evidence that any such analysis has been undertaken.
- 1.4** Chipstead, in particular, is already experiencing high levels of rat-running, especially during peak hours, and residents are concerned that any increase in traffic associated with the Application site would worsen the situation, which is already wholly unacceptable.
- 1.5** This document is a formal response, on behalf of CRA, to the Transport Assessment prepared by WSP. Many residents of Chipstead will also be making their own individual representations, as will CRA on non transport related matters.

2.0 BACKGROUND

- 2.1** Coulsdon is situated at the outer edge of suburban London and its southern boundary abuts the village of Chipstead and the Surrey road network.
- 2.2** Coulsdon is located within the London Borough of Croydon (LBC). Transport for London (TfL) has an interest as Highway Authority for the A23. Chipstead lies within Reigate & Banstead Borough Council (RBBC) where the Highway Authority is Surrey County Council (SCC).
- 2.3** The principal vehicular routes to the south of Coulsdon are:
- A23, which connects directly to the M23 and thence to the M25
 - B2032, Chipstead Valley Road, which provides a link from Coulsdon to Kingswood, Banstead, the A217 and Epsom.
- 2.4** For much of the day and especially during peak hours, parts of the Coulsdon road network are severely congested. The Brighton Road north of Coulsdon is overstretched, but so too is the northern end of Chipstead Valley Road and particularly its junction with Lion Green Road and Woodcote Grove Road.
- 2.5** Due to congestion on the surrounding Principal Road network, there has for some years been considerable rat-running through Chipstead village, in both the North/South and East/West directions. This has become a greater problem over recent years, possibly due to the increasing use of satellite navigation systems.
- 2.6** The village of Chipstead is characterised by narrow, winding lanes, mainly without pavements and all without street lighting. These lanes are frequented by pedestrians, cyclists and equestrians, who seek to share the space with vehicles.

- 2.7** The nature of the narrow lanes in Chipstead makes them totally unsuitable for use by longer-distance traffic. Through traffic often travels at inappropriate speeds and threatens the well-being and safety of the other road users. The village has already embarked on an extensive 'Speed Watch' programme, and recorded results are adding statistical validity to the substantial body of anecdotal evidence and earlier traffic counts. A package of Traffic Management and Traffic Calming measures is currently under consideration.
- 2.8** With this background, it is understandable that CRA feels that it would be unrealistic and potentially unsafe to try and accommodate any additional traffic arising from the Lion Green Road Mixed-Use development. This refers to both the traffic arising from the development itself and that created during the construction phase.

3.0 RELEVANT STUDIES

- 3.1** In parallel with consideration of this Planning Application, LBC is processing the responses to a Public Consultation on the Draft Coulsdon Masterplan. The Masterplan includes an outline description of the three proposed major developments at Cane Hill, Lion Green Road Car Park and Red Lion. It is understood that LBC has received “a healthy response” to the Draft, including many objections about traffic implications and officers hope to report on the matter by the end of September.
- 3.2** **tsp** responded to the Draft Masterplan and, amongst other things, the **tsp** response concluded that “*for reasons of good practice and transparency, the points made in this document [the **tsp** response] and those raised by others, should be fully addressed **before** the Planning Application for the Cane Hill site is considered.*” Of course, the same applies for the Lion Green Road Car Park Application but, at that time, it was unknown that it would precede the Application for Cane Hill.
- 3.3** In its response to the Draft Masterplan, **tsp** also concluded that “*The Draft Masterplan does not address the impact of the proposed developments on the already congested surrounding highway networks. In particular there is no evidence to show that the proposed developments can be accommodated without significant highway improvements or alternatively, unacceptable levels of congestion.*”
- 3.4** **tsp** has been advised by LBC that all forthcoming Planning Applications (hereafter named ‘Planned Developments’) in Coulsdon (namely; Lion Green Road, Cane Hill and Red Lion) should include detailed Transport Assessments, including **all** traffic associated with each of the other ‘Planned Developments’. In other words, the Council should be able to see the cumulative effect of all three developments before making its decisions.
- 3.5** In November 2012, a Highways & Transportation Technical Note was prepared by Mayer Brown concerning the vehicular access to Cane Hill. It assessed the capability of the Brighton Road/ Marlpit Lane (BR/ML) roundabout to accommodate Cane Hill traffic. The Technical Note anticipates that “*a small element of development traffic*” will be permitted to enter/exit through a secondary access on to Portnalls Road, but assumes, as a worst case, that *all* development traffic will enter/exit the site from the BR/ML roundabout. The report concludes that the roundabout will operate satisfactorily as the primary point of access to Cane Hill.

- 3.6** Considering **tsp**'s appointment by the CRA in January 2013 and its request to discuss transport issues with Mayer Brown, it is surprising that this Technical Note was not brought to **tsp**'s attention until 16th July 2013, indeed after the LBC Case Officer for the Masterplan mentioned it to a Chipstead resident and described it as *"the Transport Report that was undertaken to finalise the Draft Coulsdon Masterplan document."*
- 3.7** Further enquiries with the Case Officer revealed earlier work undertaken on highway and traffic matters by Alan Baxter & Associates in 2011. On 26th July 2013, the Case Officer confirmed that she had no other technical reports in relation to transport.
- 3.8** Within a few days, on 31st July 2013, **tsp** was advised by a Chipstead resident about the existence of a study undertaken by Mott MacDonald in July 2011. The study was commissioned by LBC to investigate the feasibility of introducing signalised pedestrian crossing facilities at the Chipstead Valley Road / Lion Green Road / Woodcote Grove Road / Woodman Road junction in Coulsdon. On 1st August 2013, the LBC Director of Planning and Building Control stated that *"We are unaware of this as Motts have not been engaged by the Council on the Masterplan project"*
- 3.9** Within the conclusions of the highly relevant Mott MacDonald report, it states:

"Modelling has shown that currently two of the junction approaches, namely Chipstead Valley Road eastbound and Lion Green Road, operate over capacity during weekday peak periods. The Lion Green Road northbound approach operates at 108% degree of saturation during the AM and 104% during the PM peaks. The Chipstead Valley Road eastbound approach operates at 106% in the AM peak and 94% in the PM peak periods. This is consistent with site observations made by Mott MacDonald staff. It was noted that during the peak periods the queues at Chipstead Valley Road eastbound approach do not clear during the cycles and at times the queues on Lion Green Road extend through the junction to the south with Brighton Road. All other arms appear to operate within capacity".

3.10 The report did suggest possible improvements to this junction, aimed at increasing capacity. These included the banning of the right turn from Lion Green Road, the banning of the right turn from Chipstead Valley Road (East – Town Centre arm) and the banning of the left turn from Woodcote Grove Road, as well as providing pedestrian phasing on a number of the arms. Even with these improvements, the highest *theoretical* degree of saturation (DoS) on the junction during both peak periods would have been 96%. This substantially breaches the 90% DoS specified as an upper limit for an acceptable level of saturation, as suggested by TfL within their Traffic Modelling Guidelines (Version 3.0). At paragraph 2.6.1.4 it states:

“Engineers should be mindful that delay begins to increase exponentially above approximately 85% DoS [Degree of Saturation]. At junctions operating close to zero Practical Reserve Capacity (PRC), corresponding to approximately 90% DoS, small reductions in capacity can result in a significant increase in delay. For this reason a DoS of 90% represents an upper limit of practical capacity for signalised junctions”.

3.11 This can be seen graphically in the following diagram provided as part of TfL’s Traffic Modelling Guidance.

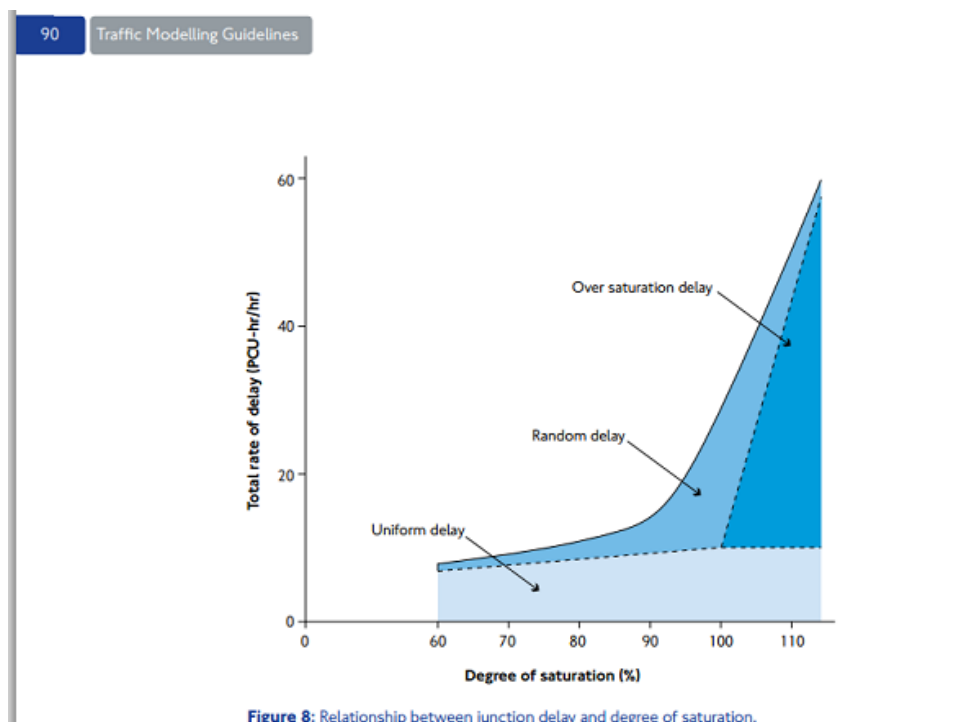


Figure 8: Relationship between junction delay and degree of saturation.

Diagram 1 – TfL Traffic Modelling Guidance Extract

3.12 In the event, *only the right turn ban from Lion Green Road was ever implemented, together with limited and somewhat inadequate pedestrian facilities*. With the above in mind, it is difficult to see how this key critical junction would be able to cope with additional traffic from any, let alone all, of the major developments proposed in the Masterplan (2 supermarkets, a health centre, up to 675 residential units and new commercial properties).

3.13 *tsp* has reviewed the submitted Transportation Assessment and believes that the conclusions contained within it are seriously flawed. In particular, *tsp* is unable to fathom how the evidence trail could lead WSP to conclude that;

"The residual cumulative impacts of development are positive, delivering reduced congestion through reducing trip distances". Irrespective of theoretically modelling exercises, this frankly defies logic.

4.0 DETAILED REBUTTAL OF THE WSP TRANSPORT ASSESSMENT

(For ease of reference we will refer directly to WSP's paragraph and table numbers)

- 4.1 Table 4.1 Traffic Surveys** – **tsp** is not confident that a single day traffic survey at the Woodcote Grove Road / Chipstead Valley Road signal controlled junction is sufficient. The performance of this junction is of critical importance in the TA and, traffic movements through this junction should have been recorded over a number of days, in order to provide robust baseline data.
- 4.2 Table 4.2 Existing Car Park Surveys** – The table clearly shows a steady arrival of cars to the car park throughout the entire day. Of particular interest are the arrivals between 10am and 5pm (i.e. between the AM and PM peak hours). Within these hours there were **41 arrivals per hour** on average. It is unclear from the TA, whether or not existing town centre user trips have been included within the junction modelling and car parking space calculations.
- 4.3 Weekday Car Parking Accumulation graphs (page 10 of TA)** - The graphs clearly show that in the region of 100 long-stay parkers use the existing car park on a weekday. No provision is allowed within the TA to relocate these 100 long-stay parkers. It should be remembered that these are not just 'Commuters' travelling into London, many are people working in Coulsdon town centre. A significant provision for long-stay parkers should be made. Furthermore, a 4679sqm supermarket will employ a considerable number of staff (up to 200), working in shifts. Where are these staff members supposed to park if there is no long-stay parking within the area? They are certainly not all going to be arriving by public transport, walking or cycling.
- 4.4 Table 4.3 – Observed Vehicular Volume** - The Table shows that the suggested peak hours within the vicinity of the site are 08:00am-09:00am and 17:00-18:00pm. **tsp** is not convinced that these are indeed the existing peak periods for traffic on the surrounding road network. The Mott MacDonald Report found the peak hours to be 07:30am-08:30am and 17:15-18:15pm. A review of the traffic data at Appendix A of the TA, also seems to suggest that the Mott MacDonald peak hour timings are in fact correct and the figures used by WSP are accordingly unreliable and an under estimate. LBC and TfL should ensure that the junctions are tested based on the real 'peak period' flows, **plus** development traffic (from all three planned developments).

- 4.5 Paragraph 4.4.6 – (and Appendix C)** The existing degree of saturation through the junction (90%) is based on the peak hours, as shown in Table 4.3. As stated above the existing peak hours still need to be determined. Only when this is done, can the junction be tested accurately. The Degree of Saturation is at odds with that reported in the Mott MacDonald study.
- 4.6 Paragraph 4.5.2 –** There have been a total of 9 Personal Injury Accidents involving pedestrians and cyclists in the vicinity of the site, in the latest 3 year period. The supermarket will significantly increase the number of pedestrians and vehicles in the area. What facilities are being provided to improve conditions for these vulnerable users?
- 4.7 Paragraph 5.2.1 –** It is unrealistic to suggest that shoppers will carry heavy shopping bags over a 2km (25 minute) walking distance. However, it is accepted that staff *may* walk these distances.
- 4.8 Paragraph 6.3.2 –** relocating the access north on Lion Green Road, could cause significant problems. In particular, northbound traffic queuing on Lion Green Road frequently queues back beyond the proposed access point. It is acknowledged that a 'Keep Clear' marking is proposed but these are often disobeyed and no enforcement measures are proposed. Even with a Keep Clear marking, it will be difficult for vehicles turning left out of the proposed access, to do so without experiencing delays and having to rely on drivers on Lion Green Road giving way to them. Worse still, **drivers trying to turn into the site, performing a right-turn, will inevitably cause traffic to back up to the traffic signals, potentially creating grid-lock.**
- 4.9 Paragraph 6.4.1 –** TfLs latest car parking standards for retail developments are shown below (as shown in The London Plan 2011).

Parking for retail

Maximum standards for retail uses: space per sq m of gross floorspace			
Use	PTAL 6 and 5	PTAL 4 to 2	PTAL 1
Food			
Up to 500 m ²	75	50-35	30
Up to 2500 m ²	45-30	30-20	18
Over 2500 m ²	38-25	25-18	15
Non food	60-40	50-30	30
Garden Centre	65-45	45-30	25
Town Centre/ Shopping Mall/ Dept Store	75-50	50-35	30

- 4.10** The site has a PTAL of 3. Therefore, for the supermarket (4679sqm) 1 space should be provided per 25sqm-18sqm. This would equate to between 187 and 260 car parking spaces. The proposal allows for 190 car parking spaces, which is at the lowest end of the suggested provision. The size of the supermarket suggests that provision should be at the higher end of the range. It is also important to remember that the car park would also be used by the existing "town centre users" for short-stay parking. As we detailed in our **paragraph 4.2**, there was an average of 41 short-stay arrivals recorded within the existing car park. **The provision of short-stay parking for existing town centre users is essential, if the vibrancy of Coulsdon town centre is not to be seriously undermined. The inclusion of 100 long-stay parking spaces is also vital.**
- 4.11 Paragraph 6.5.1 – tsp** would suggest that the 5 service vehicle trips proposed is a significant underestimation. This is a very large supermarket, which will require a significant number of 16.5m articulated vehicles to deliver goods to the store. A full analysis of likely service vehicle trips should be provided including the evidence base.
- 4.12 Paragraph 6.5.1 (and Appendix J) –** The swept paths included in **Appendix J**, clearly show that articulated vehicles exiting the proposed access, need to do so utilising all 3 lanes of Lion Green Road. This is not an acceptable practice and it will **cause unnecessary safety issues** for other drivers and cyclists.
- 4.13 Paragraph 7.2.2 –** It is encouraging to see that the Applicant expects short-stay parkers to remain at the car park. As detailed above, however, no proper allowance has been made within the proposed car park for these existing short-stay parkers to remain. With regard to long-stay parkers, the small number of additional spaces already provided at Coulsdon South Station are already being fully utilised and are clearly insufficient to accommodate the existing 100 or so long-stay parkers, or the new longer-stay parking generated by the significant number of new staff at the supermarket.

- 4.14 Paragraph 8.3.2** – The traffic flows provided from the Transport Consultants dealing with the Cane Hill and Red Lion Sites have almost no meaning. How is it possible on the evidence to hand to determine whether or not the provided traffic flows are in any way robust or accurate? A full and thorough breakdown of the 'Planned Development' trips should be included within **this** TA. **tsp** is particularly keen to see all trips predicted to and from the Cane Hill site. Access arrangements for Cane Hill have not been agreed with LBC, therefore this TA should allow for all of the Cane Hill traffic accessing and egressing from Brighton Road (Marlpit Roundabout). Based on the figures used in Appendix B of the TA, it would suggest that only a low percentage of the total development flows (up to 675 residential units) has been modelled.
- 4.15 Paragraph 9.2.4** – As mentioned earlier, can LBC and TfL be sure that the peak hours are correct? The TRAVL/TRICS analysis at Appendix K only shows data for the "suggested" peak hours. Data should be provided for extended morning and evening peak periods (say 07:30am-09:30am and 16:00pm-19:00pm), in order that a true peak hour can be established and a robust assessment can be undertaken of the surrounding highway network.
- 4.16 Paragraph 9.2.6 (Table 9.3)** - The table shows a significant, and perhaps unrealistic, number of people arriving at the store by walking or using public transport. The pedestrian facilities provided at the Lion Green Road /Chipstead Valley Road junction are woefully inadequate to deal with high numbers. From observation, pedestrians crossing the Lion Green Road from east to west (east side) have to wait an inordinately long period of time, before 'their turn' in the signal phasing. Crossing the second half of the road is much easier. This results in those that know the junction, ignoring the (strangely-kerbed) central refuge stagger, and, those crossing in the opposite direction having to wait for long periods in the middle of the road. This can be quite intimidating for the vulnerable user.

- 4.17 Paragraph 9.3.1** – It is unrealistic to suggest that the health centre will not generate any new trips. Due to the congestion in the area, even the smallest number of additional trips could have a significant impact on the local junctions. Therefore a full assessment should be undertaken. Also the provision of 12 car parking spaces for both staff and patients seems very low. It is not clear from the TA how many staff will be required or even how many consulting rooms will be available. However, at almost 1000sqm in size, it is quite clear that there could be very many. The shortfall in parking will inevitably result in visitors using the supermarket car parking spaces, further reducing the spaces available to those customers.
- 4.18 Paragraph 9.4.4** – The suggestion that 60% of the trips to the supermarket will be pass-by trips seems an unrealistic exaggeration. **tsp** is unaware of the two retail studies referred to (we do however note that these are in the region of 20 years old!). However, when undertaking assessments for similar supermarket schemes, an allowance of around 20% pass by trips would provide a more robust conclusion. Pass by traffic at 20% has been used by **tsp** and other consultants and found to be a reliable predictor. Bearing in mind that the existing road network is severely congested, LBC and TfL should request that the existing highway network is modelled based on a much lower percentage of pass-by trips. The trip data suggests 420 two-way vehicle trips in each peak hour!
- 4.19 Paragraph 9.5.2** – The retail catchment plan shows that a minimum of 12% of the trips would be from/to the Chipstead area, yet no analysis has been provided of the impact on Surrey's road network. The TA fails to look at the impact on SCC's road network at all. The majority of the roads through Chipstead are narrow unlit country lanes with no footways or cycle provision. Any projected increase in traffic needs to be analysed, with the safety of existing road users taken into account.
- 4.20** **tsp** has been advised by the transport consultants for Cane Hill that it may increase peak hour trips through Chipstead by approximately 50, related to the housing development alone (but of course this is still to be determined through the Cane Hill TA). Furthermore, the impact of any additional trips for the Aldi supermarket should also be analysed, together with an assessment of the likely rat-running. A more robust area-wide model should be developed, eg using '*Paramics*', to visually demonstrate to Members and decision-makers, the likely effects on the network of the combined 3 developments proposed (assuming a realistic input, of course).

- 4.21 Paragraph 10.3.6** – As detailed previously, it is highly unlikely that 60% of the trips to the supermarket will be 'pass-by' trips. An assessment of the junctions should be undertaken based upon a lower pass-by rate (at least sensitivity tests should have been undertaken). The TA assumes a large number of redistributed trips, which has the effect of reducing the theoretical saturation levels at the key junctions. LBC should request that the junctions are tested using a much lower pass-by trip rate and a much lower redistributed trip rate. It is normal to model 'worst case' scenarios, yet this TA always tends towards best case and is therefore an inappropriate basis for decisions to be taken by Officers and Members.
- 4.22 Paragraph 10.4.1** – As detailed previously (*tsp* para **4.8**) relocating the access further north on Lion Green Road, could cause significant problems. In particular, northbound traffic queuing on Lion Green Road frequently queues back beyond the proposed access point. Worse still, **drivers trying to turn into the site, performing a right-turn, will cause traffic to back up to the traffic signals, potentially creating grid-lock.** LBC and TfL need to be sure that the proposed junction could perform well at all times, taking on board the existing capacity issues on Lion Green Road.
- 4.23 Paragraph 11.2.3** – Given the desire and obligation to promote sustainable development, it is surprising that the TA concludes that the existing bus stops, at Coulsdon Library on the Brighton Road and on the B2032, Chipstead Valley Road, are adequate to serve this major supermarket and Health Centre.
- 4.24 Paragraph 11.3.2** – It is astonishing that the TA concludes that the existing pedestrian crossing facilities (at the northern and southern ends of Lion Green Road) will be adequate for the proposed development. Given that an important, even key, feature of this development (as frequently referred to in the Planning Statement and the Design and Access Statement) is the way in which this development will link Cane Hill with the town centre, it is almost unbelievable that no extra provision is being made for pedestrian flows. The result will be that pedestrian safety will be seriously compromised.
- 4.25 Paragraph 12.2** – This is *not* a Travel Plan. Such a plan is required in support of the Planning Application.

5.0 CONCLUSIONS

- 5.1** The Stilwell Partnership has reviewed the Transport Assessment (TA) accompanying Planning Application 13/02178/P and found it to be seriously flawed.
- 5.2** Lion Green Road and the adjacent road network are already congested. In peak periods, the congestion is severe. In particular, two of the approaches to the signalled junction between Lion Green Road and Chipstead Valley Road (LGR/CVR) operate over capacity during peak periods. This is consistent with a detailed survey carried out in 2011 as part of a report by Mott MacDonald and is confirmed by residents. In these circumstances, for WSP to rely upon a single weekday survey at this junction to assert that it is operating satisfactorily, is imprudent.
- 5.3** There are significant discrepancies between the degrees of saturation at LGR/CVR derived from the Mott MacDonald modelling, and those reported in the TA. It is also significant that the assumed peak hours are different. Present day observations suggest that, in both cases, the Mott MacDonald assumptions are likely to be more realistic. Even a casual observer can see that, irrespective of theoretical capacity calculations, the junction is severely overloaded now and certainly could not accommodate the three significant developments now being progressed. The result of the theoretical modelling, which indicates an apparently less stressed junction **with** the development traffic, than as existing, beggars belief.
- 5.4** Because of the existing congestion, many local motorists avoid Lion Green Road and its junction with Chipstead Valley Road and rat-run through village lanes in Chipstead and other unsuitable residential roads in Coulsdon. The whole road network is affected by this proposed development and its associated rat-running needs to be modelled. **The TA fails to address this important issue.**

- 5.5** The Transport Assessment assumes a much lower figure for traffic emerging from Cane Hill to the Marlpit Lane roundabout, than that assumed in the Technical Note prepared by Mayer Brown in November 2012. Doubtless this is because, in the TA, it is assumed that a proportion of the traffic from Cane Hill will utilise a “secondary” access to Portnalls Road. When this “secondary” access was first floated in the Masterplan it was stated that it would only serve a small proportion of the Cane Hill traffic. In any event, the TA for the supermarket should have examined a worst case scenario, with all Cane Hill traffic emerging through the Marlpit Lane roundabout.
- 5.6** The TA assumes percentage reductions for pass-by trips, which are too large and far greater than any used in comparable studies by The Stilwell Partnership. Rather than adopting a worst case assumption, the TA has used an unrealistic figure and no sensitivity testing has been disclosed.
- 5.7** The site access itself is unsuitable, in terms of the swept-path of delivery vehicles, requiring the use of the entire width of Lion Green Road to exit the site. With the nearby Lower Green Road/Chipstead Valley Road traffic signal junction operating close to, or above capacity and with traffic queues already formed, this could rapidly create gridlock conditions.
- 5.8** The lack of consideration for those who currently use the car park facility for long-term parking is shameful. Parking provision is inadequate for customers and staff at the supermarket and the health centre. There is no provision for displaced parkers (existing users of the car park).
- 5.9** Pedestrians and those travelling to the supermarket and health centre by public transport are not well served. There appears to be no intention to provide a closer bus stop than those already existing and no attempt to facilitate pedestrian movement between the supermarket and the town centre. The Stilwell Partnership has serious concerns about the suitability of the pedestrian facilities at the Lower Green Road/Chipstead Valley Road junction to accommodate the number of pedestrians likely to be attracted to the new supermarket.
- 5.10** Contrary to London Plan Policy 6.3 this development will adversely affect safety on the transport network. Contrary to Croydon Plan Policy T2, the traffic generated by the development cannot be satisfactorily accommodated on the nearby roads. In terms of NPPF Paragraph 32, the residual cumulative impacts of this development will be severe.

- 5.11** The TA generally looks at the proposals through rose tinted spectacles. It is unsatisfactory because by not addressing the realistic and worst case scenarios it manages to draw the wrong conclusions.
- 5.12** The Planning Application for this development is clearly premature in the context of the Masterplan and should not be considered in isolation from the other two forthcoming Applications (Cane Hill and Red Lion). They should all be taken together and supported by a Transport Assessment, prepared independently and with the whole network mathematically modelled.
- 5.13** It is doubtful whether such significant development should be permitted, without considerable enhancement to the existing transport infrastructure.