

3rd February 2020

Mr Charles Thuaire
Planning Department
London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall, Judd Street
London
WC1H 9JE

Our Reference: 2019/3669-L01-PS-Transport Response

Dear Mr Thuaire,

The Water House, Millfield Lane - 2019/5226/P

TTP Consulting has been instructed by Orcadian Planning to provide a response to comments submitted on behalf of Kenwood Ladies Pond Association by WSP in a letter dated 27th November 2019.

The primary point discussed in WSP's letter relates to pedestrian visibility splays at the site access, which it considers do not meet typical recommended best practice. WSP's letter acknowledges that Camden's Council's guidance does not specify minimum pedestrian inter-visibility splays and as such, it has referred to guidance produced by Surrey County Council and Kent County Council, which WSP advise recommends 2m x 2m pedestrian visibility splays.

Camden Council's March 2019 Transport planning guidance document contains guidance on visibility and sight lines for emerging vehicles, which notes that;

"The Manual for Streets provides guidance on visibility requirements"

The Department for Transport's 2007 Manual for Streets (MfS) does not specify minimum pedestrian visibility splays but advises that;

"The absence of wide visibility splays at private driveways will encourage drivers to emerge more cautiously. Consideration should be given to whether this will be appropriate, taking into account the following:

- *the frequency of vehicle movements;*
- *the amount of pedestrian activity; and*
- *the width of the footway."*

Many Councils have revised their guidance on pedestrian visibility following the publication of Manual for Streets and I note that Kent County Council's 2008 supplementary guidance document on visibility advises that;

"This "pedestrian visibility" has historically been provided as triangular splays on both sides of the driveway, starting at 2.4m by 2.4m but reducing some years ago to 2.0m by 2.0m. Such splays have often been very obvious and unnecessarily intrusive."

And

"MFS (Sections 7.8.3 and 4) recommends initial assessment of need, careful design of necessary pedestrian visibility, and proper regard for the actual driver to pedestrian (and vice versa) line of sight scenarios rather than old style splays."

With regard to the criteria identified in Manual for Streets, it is noted that Millfield Lane is extremely lightly trafficked and predominately used by pedestrians and cyclists. I have attached survey data undertaken in 2011 for a planning application for this site which shows that over a 12 hour period, 703 pedestrians and 104 cyclists passed along Millfield Lane and only 17 vehicle movements were recorded during the same period. There is no footway on Millfield Lane and given the low level of vehicle movement, pedestrians are free to use the full width of the lane, rather than be guided to use one side or the other. In this environment I do not consider the absence of wide pedestrian visibility splays will be detrimental to pedestrian safety, as drivers will be aware of the likely presence of pedestrians and would proceed with caution as noted in Manual for Streets.

WSP has noted that it is understood that pedestrians predominately walk along the northern side of the road to allow vehicles to pass when encountered, but has provided no evidence to support this assertion. I have no data to dispute this but I note that in the vicinity of the site, many pedestrians will be travelling to and from the Ladies Pond, which is on the southern side of Millfield Lane and that if approaching from the west, vegetation on the northern side of the road (which can be seen on the following image taken today) could discourage pedestrians from using this side of the road when a vehicle passes.



In any event, given the extremely low level of vehicle movement on Millfield Lane, the likelihood of a pedestrian and vehicle passing on Millfield Lane at the same time that a vehicle leaves the site will be extremely low.

The proposals for the Water House seek to provide space on site for delivery vehicles to turn, as demonstrated by WSP on swept path plot 7543-004-ATR-001. The provision of this space on site means that delivery vehicles can be accommodated on site and will not need to reverse to or from Millfield Lane, which is a significant improvement over the existing situation. WSP has commented that this manoeuvre would not be possible if another vehicle were parked in this area, but it is not intended that this area be used for parking, a covered car port is located toward the northern boundary of the site.

In summary, I consider that the proposed site access arrangements are not contrary to guidance provided by Manual for Streets or Camden Council and that in this lightly trafficked environment, the absence of wide pedestrian visibility splays will not be detrimental. It is the case that the revised access arrangements will enable delivery vehicles to turn on site, which is an improvement over the existing situation.

Yours sincerely,



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Key:
123 Pedestrians
45 Cyclists
67 Motor Vehicles

