PAUL MEW ASSOCIATES

TRAFFIC CONSULTANTS 020 8780 0426

SPACE SOLUTIONS UK LIMITED

KINGSWAY MEWS,

EAST SHEEN, SW14 7HN

TRANSPORT STATEMENT

February 2019

PAUL MEW ASSOCIATES - TRAFFIC CONSULTANTS
Unit 1, Plym House, 21 Enterprise Way, London SW18 1FZ
T:0208 780 0426 E:paul.mew@pma-traffic.co.uk W: www.pma-traffic.co.uk

Contents

Figures

Appendices

Ref: File path P:\ P1239 Kingsway Mews Transport Statement February 2019

1.0 INTRODUCTION

1.1 Paul Mew Associates is instructed by Space Solutions UK Limited in relation to the proposed development on land to the rear of 127-147 Kingsway, London, SW14 7HN.

1.2 The site's location is presented on a map in Figure 1 of this report, the site boundary is displayed on an Ordnance Survey (OS) map base in Appendix A.

1.3 The application site is located south of the A3003 Lower Richmond Road. The site is close to East Sheen and Mortlake train stations as well as local bus stops and shops services and amenities on Upper Richmond Road West to the south of the site. The site is therefore located within close proximity to a number of shops, services, amenities and public transport access points.

1.4 The site has a public transport accessibility level (PTAL) score of 2 which is a poor rating as defined by Transport for London (TfL). The roads adjoining the site are not within a controlled parking zone (CPZ).

1.5 The site is currently occupied by 45 lock-up garage units in total. Units 21 to 26 inclusive (seven units in total) comprise of the road arches and are the two existing business units i.e. the timber business and the car mechanic business. The remaining number of lock-up garage units is 38, two of which are currently vacant and not in use which leaves 36 lock-up garages with tenants.

1.6 Vehicular access to the site is served via drop kerb from Kingsway to the north of the site between 125-127 Kingsway.

1.7 The proposal comprises of the demolition of the existing lock-up garages and the erection of six residential units (two three-bedroom and four two-bedroom houses), incorporating two commercial (B1a offices) units totalling 152 sqm, with amenity space, 14 off-street car parking spaces and associated works.

1.8 The proposal includes the formation of a new secure pedestrian entrance to the site from the A205 Clifford Avenue on the eastern boundary, the pedestrian entrance will provide steps plus a hoist for pushchairs and wheelchair users.

1.9 The existing entrance to the site from Kingsway will be maintained and substantially enhanced under the proposals. The access will be fully resurfaced from Kingsway into the site to comprise of a high quality shared surface driveway with a separate at-grade footpath, low level lighting, and a traffic (vehicle, cyclist, and pedestrian) signal control system. The driveway will also be made wider as it leads into the site, therefore the narrower section of the access will be reduced in length from 35 metres to only around 25 metres.

1.10 The proposed site plan is presented at Appendix B of this report.

Recent Planning History

1.11 A planning application for the redevelopment of the site was submitted to Richmond Council in April 2016, under planning reference 16/1507/FUL. A description of the proposals is set out as follows:

> *"Demolition of 38 garages including vehicle repair garage and the erection of six residential units (2x 3 bed and 4 x 2 bed), incorporating two commercial (B1a offices) units (totalling 152 sq.m), with amenity space, off-street car parking and associated works."*

1.12 The scheme provides 14 off-street car parking spaces inclusive of one disabled space; the parking spaces will be served via Kingsway from the existing vehicle entrance.

1.13 The only material difference between the scheme recently refused by Richmond Council and the scheme proposed herein is the introduction of the new pedestrian entrance to the site from the A205 Clifford Avenue.

1.14 Richmond Council refused planning application 16/1507/FUL in July 2018 citing two reasons for refusal, one of which relates to transport matters and is extracted below for ease of reference:

> *"U46192 Transport*
> *The development, by reason of the intensified use of the site and the proposed access to the site and its constrained width, would be detrimental to road and pedestrian safety, and would adversely affect the flow of traffic on Kingsway. The proposal is considered to be contrary to objectives of the NPPF (2012) and Local Plan, particularly policies LP44 and LP45 of the Local Plan (July 2018) and Front Garden and Other Off Street Parking Standards' SPD (2006)."*

1.15 The Officer's Report which accompanied the Council's decision notice sets out a detailed assessment of the reasoning behind the decision to refuse the planning permission. The wording of the transport and parking section of the Officer's Report is extracted in full as follows as it is of material importance to the setting out of this statement:

> *"TRANSPORT AND PARKING*
>
> *Policy LP45 of the Local Plan (July 2018) states the following:*
>
> *The Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car based travel including on the operation of the road network and local environment and ensuring making the best use of land. It will achieve this by:*
> *Requiring new development to provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points, in accordance with the standards set out in Appendix 3. Opportunities to minimise car parking through its shared use will be encouraged.*
>
> *Appendix 3 requires 2-bedroom units to provide 1x parking space and 3-bedroom units to provide 2 x car parking spaces in low PTAL areas. Additionally, car parking spaces should meet the standard as set out in the 'Front Garden and Other Off-Street Parking Standards' SPD, with adequate manoeuvrability and access to each space. Cars are required to manoeuvre on site so as to access/egress classified roads in forward gear.*

Loss of Garages and Parking

The proposal includes loss of 38 garages. The Planning Inspector in his report (appeal ref. no. APP/L5810/W/15/3133362) agreed that without a sufficient information, the removal of garages could give rise to additional demand for parking on the adjacent residential roads. The Planning Inspector in his report stated the following:

'At my site visit during the middle of the day I observed that the surrounding residential area is heavily parked with cars and that few of the houses have off-street parking. I would expect that demand for spaces would rise during the evenings and over-night when residents return home. There is some evidence submitted in relation to the level of use of the garages from the appellants and from local residents; in addition, the Council states that they observed that a number of garages are in use.

There is no comprehensive information submitted for the appeal that indicates the levels of on-street parking in the surrounding residential streets and the likely amount of car parking that would be displaced by the removal of the existing garages. Taking account of the levels of on-street parking that I observed during the day, I am concerned that any increase would not be readily absorbed on the neighbouring streets, particularly in the evenings and over-night when demand would be expected to be highest.

The appellant indicates that cars parked in the garages by local people living very nearby is at a low level and that the garages are sub-standard in terms of size. The fact that some people park in the garages who may live beyond the immediate surrounding area indicates that they do not find it inconvenient to park in this locality; given that there are no parking restrictions on the adjacent roads, it could also indicate that they would not find it inconvenient to park on the road, particularly if they live in an area where restrictions apply (which is the case for some nearby streets). In relation to the size of the garages, whilst I accept that the limited size may put some people off using them, it strikes me that there is some popularity for small cars due to a number of factors, the owners of which may not find this a deterrent.'

14 parking spaces are indicated on plan. The residential units would require 8 spaces and the offices would require 1 space each. This would leave 4 unallocated spaces. The London Plan has a lower residential parking requirement but given the very recent adoption of the Local Plan and noting that local standards have been justified, it is considered reasonable to apply the parking standards in Appendix 3.

To address the previous reason for refusal, the applicant has provided some information regarding the existing use of the garages.

The applicant in submitted information argues that only 3 existing garage tenants live within three streets of the site – on Kingsway, Shalstone Road and Clifford Avenue and only one garage from the garages used by local residents is used for storing a car. The remaining two garages are used for storage. All other garage tenants live outside of the three aforementioned roads and outside SW14 postcode. Two garages are currently vacant and of the 36 remaining occupied garages only 8 are used for storing vehicles (mainly smaller vehicles) and the remaining garages are used for storage.

It should be noted that during the Planning Officer's visit, a number of vehicles were parked outside the garages. It was unclear whether those vehicles are awaiting repairs by existing garage or whether they were parked there by local residents or tenants of the garages. No information was submitted on hard standing for parking.

The applicant states that removal of the garages would result in an overspill demand for parking of one car only as only one garage is used by a local resident for storing a car and the overspill of one car would have an insignificant impact on the adjoining streets in terms of parking pressure. The information submitted in 'Technical Note' Statement (prepared by Paul New Associates Traffic Consultants Ltd), in section 10 in which applicant states that only three garages are rented out to people within two roads of the site and if garages are used for parking vehicles, the worst possible case the development will result in a overspill of three vehicles onto the surrounding roads and this small overspill will likely be absorbed into daily fluctuation of parking levels.

However, the Council's Transport Officer does not agree with this statement and states that given the already heavily parked streets in this location, even 3 vehicles overspilling onto the adjacent road could have a severe impact with reference to the NPPF test, and would not be in the daily variation for residents. The over spill vehicles would be parked overnight which will impact availability on street. The applicant has indicated that they could offer the additional on-site provision to the tenants of these garages in the first instance to address some of the overspill.

Due to data protection purposes, the addresses of the tenants could not be provided by the applicant. This could be seen as insufficient information were provided to confirm the number of garages used by local residents. The Planning Inspector in his report further states that 'the fact that some people park in the garages who may live beyond the immediate surrounding area indicates that they

do not find it inconvenient to park in this locality; given that there are no parking restrictions on the adjacent roads, it could also indicate that they would not find it inconvenient to park on the road, particularly if they live in an area where restrictions apply (which is the case for some nearby streets).' As such, the potential overspill could be higher.

The applicant shows office use which is laid out with quite a few desks and only 2 parking spaces are proposed to be allocated to the office use. The staff could be driving to work as there is no way to prevent them doing so as the site has a low PTAL level of 2 and any additional vehicles would need to park on local roads. Notwithstanding this, it is recognised that parking is provided to standard and any overspill arising from the day is more likely to be able to be accommodated on-street given that the times of peak parking stress are likely to be overnight when residents are at home.

Informal observations from representations and the Planning Inspector are that the on street parking is at capacity with little available space. No parking survey has been provided by the applicant to demonstrate otherwise or to demonstrate that the overspill can be accommodated on street. Notwithstanding this, officers are aware from another application currently under consideration (18/0549/FUL) that parking surveys have been undertaken on Kingsway and Shalstone Road. Shalstone Road was found to be at 92% stress on weekdays and overnight weekdays and 100% stress on overnight weekends. Some limited capacity is available on Kingsway with peak stress found to be 82% overnight at weekends. Looking at these roads together, peak stress at weekends is some 88%. An additional 4 vehicles parking on-street overnight at weekends would take stress levels to some 90% which is regarded as heavily parked.

Overall, given that car parking for the proposed uses has been provided to standard, additional parking has been provided on-site to accommodate at least some of the overspill arising from the loss of the garages (and subject to condition to secure a scheme to allow these to be made available for local parking), and officers understanding of parking stress in the locality, it is considered that, whilst this is finely balanced, the proposal would not increase parking stress to the point to which a severe impact would occur.

Has the application been found acceptable, a preclusion on parking permits in the event of a future CPZ would have to be secured via legal agreement or Grampian condition.

The proposed parking spaces measure off at approx. 4.8m x 2.4m, meeting the requirements in the Front Gardens and Off Street Parking Standards SPD.

Servicing/delivery area has been proposed for commercial units. This would minimise demand on on-street parking (subject to delivering vehicles being small to access the site) and in the light of above, the applicant has addressed one of the Planning Inspector's concerns.

Access

The additional dwellings could be expected to generate more vehicular and pedestrian trips. The submitted Transport Statement includes a survey of the number of vehicles that access the site now on a daily basis and the average is 15 over 24 hours (30 two way movements) with 3 two way movements in the AM peak and 5 two way movements in the PM peak being the highest number of vehicles in any hour. This is considered quite moderate when compared to the dwelling vehicle trips of 28 over a 12 hour period (figures from the submitted TS). Add the trips from the office which is stated as 4 due to the on site parking and we have 32 movements minimum which is higher than existing. Furthermore it is likely that there will be additional trips given visitors/deliveries/couriers etc.

It is reasonable to consider that there would be an increase in the number of pedestrian, cycle and vehicular trips generated using the access road. The current proposal would generate traffic and pedestrian movement from both, the commercial and residential use including visitors. The units proposed may accommodate families. The submitted TS acknowledges that there would be an increase in pedestrians using the access. Therefore it cannot be compared to current arrangements on site where the site is used for car repairs, parking and storage.

The proposed access road is very narrow. At the time of the previous application the plans indicated that at it was approx. 2.6m – 3.2m wide. The information submitted with this application indicate that at its narrowest, the access is 2.78m wide.

It remains the case that the total width of the access is such that conflict between vehicles and pedestrians is likely to arise. Painting a footway does nothing to alleviate concerns in this respect and the Council's and Inspector's findings and reason for refusal remain pertinent.

The access is insufficiently wide to allow for pedestrians/cyclists etc. as it would not be wide enough for them to stand safely while a vehicle passes them. Manual for Streets notes that carriageway widths between 2.75m and 3.25m should be avoided in most cases, since they could result in drivers trying to squeeze past cyclists. Whilst it is acknowledged that diagrams have been provided in the Highways Technical Note illustrating a vehicle and cyclist and wheelchair user on the access together, this serves to illustrate that any vehicle would need to manoeuvre very close the flank wall of the adjacent property to allow for this. The applicant refers to the light van illustrated being larger than an Iveco Daily 35S11 and it being the likely largest vehicle able to access the site. The Iveco Daily 35S11 is cited as being a typical home food delivery type vehicle such as those used by Asda. From vehicles specifications found online, it is understood that the Iveco Daily is 2.01m wide but this excludes the width of the wing mirrors. The light van illustrated in the diagram is quoted as having a total width of 2m and there is no indication from the tracking diagram that the wing mirrors have been illustrated.

It is noted that the narrower pinch point of the access is closer to the entrance with Kingsway that the area where the wheelchair and bicycle are annotated on the plan and the vehicle tracking requires the full width of the access. It remains that given the extensive length of the access, a driver may feel unwilling to wait for a pedestrian to walk its length before entering/leaving the site or alternatively any vehicles meeting pedestrians part way along that access would have to either reverse, which would be hazardous if reversing out onto Kingsway, or risk a hazardous passing with limited space available.

The principal of a shared surface street is accepted, but it remains that this needs to be of a reasonable width to avoid harmful conflict between vehicles and other users.

Similarly, a further difficulty would arise from vehicle users meeting from opposite directions, with one potentially having to reverse a substantial distance. Given the substandard sight lines at the vehicular entrance (not under control of the applicant), it would be a hazardous manoeuvre for motorists to reverse onto Kingsway.

The applicant has proposed a Traffic Light System. This proposal would not assist with the potential conflict between vehicles and other users of the access although it is accepted that this could assist with mitigating the extent of harm arising from conflict between vehicles using the access at the same time. There appear to be some conflicting statements within the submitted material as to how this would

operate but the principle is noted and further details could have been secured by condition.

The turning into the site of vans for servicing is very tight and given the proximity of parked vehicles to the crossover, a limited scale of vehicle would be able to make the turn. Considering the limited width of the access, a larger emergency, servicing or delivering vehicle would not be able to access the site (i.e. an ambulance is understood to be some 2.5m wide). These vehicles would need to wait at the entry to the site for some time while drivers are accessing the site on foot, which would lead to blockage of Kingsway. As concluded in the previous appeal decision, this adds to concerns with regards to highway safety and convenience.

In the light of above, the current proposal, by reason of the intensification of the access, its length, constrained width and absence of satisfactory sight lines, would be detrimental to road and pedestrian safety, and would adversely affect the flow of traffic on Kingsway.

Refuse

Refuse/recycle storages would be located an appropriate distance from the residential units. The applicant has confirmed that private waste collections would be secured on site and the site will be accessed by a waste collector on foot given the refuse vehicle would not be able to access the site due to access being too narrow. It is not clear where the refuse vehicle will park while the refuse is collected on foot, how many trips to site the waste collection would need to make to collect all the refuse from all residential units and how long it will take. A refuse strategy would need to be secured by condition."

1.16 The Officer's Report confirms that the proposed parking provision accords with the Council's parking standards and that the loss of the garages would not increase parking stress to the point to which a severe impact would occur. This is in part owing to the fact that the development includes four off-street parking spaces to offset any small amount of potential overspill demand from the loss of the garages. These additional spaces will be initially offered to the three local garage tenants. The Council would secure a Car Park Management Plan as a condition of any future planning permission, together with a preclusion on parking permits in the event of a future CPZ.

1.17 The proposed parking arrangements for the current scheme are identical to those submitted with planning application 16/1507/FUL, and accordingly the precedent for the Council's acceptance of these arrangements is now established.

1.18 As is set out in the Council's Decision Notice and Officer's Report for application 16/1507/FUL, the primary highways related reason for refusal is with regards to the site's access driveway from Kingsway.

1.19 In order to respond to the Council's reason for refusal regarding the site's access driveway from Kingsway, the current scheme has now been devised which provides a new pedestrian link to/from the site via the A205 Clifford Avenue and thus removing the majority of the pedestrian trips relating to the new development from the driveway. The driveway will predominantly serve vehicles. A

1.20 A pre-application submission for the current scheme including the new pedestrian entrance via the A205 Clifford Avenue was submitted to Richmond Council in January 2019 (reference 18/P0404/PREAPP) and a meeting was held with the Council's planning case officer and highways officer on Tuesday 15th January 2019.

2.0 POLICY CONTEXT

Richmond Council

2.1 This chapter sets out the Council's parking policy guidance.

2.2 Richmond Council's planning policy is contained in a hierarchy of policy and guidance documents from the national to the local level, all of which are used to guide and manage development in the borough.

2.3 The Local Plan (previously known as Local Development Framework) sets out the priorities for the development of the borough and is used for making decisions on planning applications. It consists of a number of planning documents and guidance.

2.4 Richmond Council adopted its new Local Plan for the borough in July 2018, which replaces previous policies within the Core Strategy and Development Management Plan. The Plan sets out policies and guidance for the development of the borough over the next 15 years.

2.5 Policy LP44 of the Council's adopted Local Plan sets out the overarching transport related objectives and is extracted as follows for ease of referral:

> *"Policy LP 44*
>
> *Sustainable Travel Choices*
>
> *The Council will work in partnership to promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions, and maximise opportunities including for health benefits and providing access to services, facilities and employment. The Council will:*
>
> *A. Location of development*
>
> *Encourage high trip generating development to be located in areas with good public transport with sufficient capacity, or which are capable of supporting improvements to provide good public transport accessibility and capacity, taking account of local character and context.*
>
> *B. Walking and cycling*

Ensure that new development is designed to maximise permeability within and to the immediate vicinity of the development site through the provision of safe and convenient walking and cycling routes, and to provide opportunities for walking and cycling, including through the provision of links and enhancements to existing networks.

C. Public transport

Ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services. Proposals will be expected to support improvements to existing services and infrastructure where no capacity currently exists or is planned to be provided. Protect existing public transport interchange facilities unless suitable alternative facilities can be provided which ensure the maintenance of the existing public transport operations. Applications will need to include details setting out how such re-provision will be secured and provided in a timely manner.

D. The road network

Ensure that new development does not have a severe impact on the operation, safety or accessibility to the local or strategic highway networks. Any impacts on the local or strategic highway networks, arising from the development itself or the cumulative effects of development, including in relation to on-street parking, should be mitigated through the provision of, or contributions towards, necessary and relevant transport improvements. In assessing planning applications the cumulative impacts of development on the transport network will be taken into account. Planning applications will need to be supported by the provision of a Transport Assessment if it is a major development, and a Transport Statement if it is a minor development.

E. River transport

Encourage the use of the River Thames for passenger and freight transport through the protection of, improvement to, and provision of new relevant infrastructure including wharves, slipways and piers.

F. Safeguarding of routes and facilities

Land required for proposed transport schemes as identified in the London Plan and the Council's Local Implementation Plan for Transport will be protected from developments which would prevent their proper implementation. Local filling stations and supporting services such as car repair facilities will be protected from redevelopment for alternative uses unless exceptional circumstances can be demonstrated that warrant their loss.

G. Taxis and private hire vehicles

Ensure that taxis and private hire vehicles are adequately catered for in appropriate locations."

2.6 Policy LP45 of the Council's adopted Local Plan sets out the parking standards and servicing standards for new development and is therefore of material importance to this assessment. The full wording is extracted as follows:

> *"Policy LP 45*
>
> *Parking Standards and Servicing*
>
> *Parking standards*
>
> *The Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car based travel including on the operation of the road network and local environment, and ensuring making the best use of land. It will achieve this by:*
>
> *1. Requiring new development to provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points, in accordance with the standards set out in Appendix 3. Opportunities to minimise car parking through its shared use will be encouraged.*
>
> *2. Resisting the provision of front garden car parking unless it can be demonstrated that:*
>
> *a. there would be no material impact on road or pedestrian safety;*
>
> *b. there would be no harmful impact on the character of the area, including the streetscape or setting of the property, in line with the policies on Local Character and Design; and c. the existing on-street demand is less than available capacity.*
>
> *3. Car free housing developments may be appropriate in locations with high public transport accessibility, such as areas with a PTAL of 5 or 6, subject to:*
>
> *a. the provision of disabled parking;*
>
> *b. appropriate servicing arrangements; and*
>
> *c. demonstrating that proper controls can be put in place to ensure that the proposal will not contribute to on-street parking stress in the locality. All proposals for car free housing will need to be supported by the submission of a Travel Plan.*
>
> *4. Managing the level of publicly available car parking to support the vitality and viability of town and local centres within the borough whilst limiting its impacts on the road network.*
>
> *Freight and Servicing*
>
> *New major development which involves freight movements and has servicing needs will be required to demonstrate through the submission of a Delivery and Servicing Plan and Construction and Logistics Plan that it creates no severe impacts on the efficient and safe operation of the road network and no material harm to the living conditions of nearby residents."*

2.7 As is referenced in Policy LP45, the Council's parking standards are set out in Appendix 3 of the adopted Local Plan. The Council's B1(a) office and C3 residential parking standards are set out as follows:

- Use Class B1 Business – car parking standard as per the London Plan. Servicing to the provided off street unless in town or district centre. Cycle parking standard as per the London Plan;
- Use Class C3 Residential – PTALs 0-3, one space per one and two-bedroom dwelling, and two spaces per three or more bedroom dwelling. Cycle parking standard as per the London Plan.

2.8 The site has a PTAL score of 2. Therefore the residential aspect of the development would require up to a maximum of eight car parking spaces in accordance with the Council's residential parking standards.

The London Plan

2.9 The Mayor of London, through the legislation establishing the Greater London Authority (GLA), has to produce a spatial development strategy (SDS) which has become known as the London Plan.

2.10 The most recent iteration of the London Plan is dated March 2016. Chapter 6 of the London Plan relates to London's Transport.

2.11 At the regional level the London Plan Policy 6.3 sets out the Mayor's approach to assessing the effects of development on transport capacity, parts A, B, and C of Policy 6.3 are extracted as follows:

> "Policy 6.3 - Assessing effects of development on transport capacity
>
> *Planning decisions*
>
> *A). Development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.*
>
> *B). Where existing transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans exist for an increase in capacity to*

cater for this, boroughs should ensure that development proposals are phased until it is known these requirements can be met, otherwise they may be refused. The cumulative impacts of development on transport requirements must be taken into account.

C). Transport assessments will be required in accordance with TfL's Transport Assessment Best Practice Guidance for major planning applications. Workplace and/or residential travel plans should be provided for planning applications exceeding the thresholds in, and produced in accordance with, the relevant TfL guidance. Construction logistics plans and delivery and servicing plans should be secured in line with the London Freight Plan and should be co-ordinated with travel plans."

2.12 This Transport Statement has been prepared in accordance with TfL's *Transport Assessment Best Practice Guidance*; the impacts of the proposed development on transport capacity are assessed within this report in accordance with Policy 6.3 of The London Plan.

2.13 Policy 6.13 of the London Plan relates to the provision of parking in new developments; at the strategic level the guidance states that:

"The Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use."

2.14 In terms of guidance for parking standards, The London Plan sets maximum parking standards in Table 6.2 and minimum cycle parking standards in Table 6.3. The following salient parking policy and parking standard notes have been extracted from The London Plan relative to this assessment:

- PARKING FOR RESIDENTIAL DEVELOPMENT – Four or more beds, 2 spaces per unit; three beds, 1.5 spaces per unit, one and two beds, less than one space per unit. All developments in areas of good public transport accessibility should aim for significantly less than one space per unit. Adequate parking spaces for disabled people must be provided preferably on-site, in accordance with the Mayor of London's *Housing Supplementary Planning Guidance*

(GLA 2012). 20% of all spaces must be for electric vehicles with an additional 20% passive provision for electric vehicles in the future.

Parking for residential development

	PTAL 0 to 1		PTAL 2 to 4		PTAL 5 to 6	
Suburban	**150–200 hr/ha**	**Parking provision**	**150–250 hr/ha**	**Parking provision**	**200–350 hr/ha**	**Parking provision**
3.8–4.6 hr/unit	35–55 u/ha	Up to 2 spaces per unit	35–65 u/ha	Up to 1.5 spaces per unit	45–90 u/ha	Up to one space per unit
3.1–3.7 hr/unit	40–65 u/ha		40–80 u/ha		55–115 u/ha	
2.7–3.0 hr/unit	50–75 u/ha		50–95 u/ha		70–130 u/ha	
Urban	**150–250 hr/ha**		**200–450 hr/ha**		**200–700 hr/ha**	
3.8 –4.6 hr/unit	35–65 u/ha	Up to 1.5 spaces per unit	45–120 u/ha	Up to 1.5 spaces per unit	45–185 u/ha	Up to one space per unit
3.1–3.7 hr/unit	40–80 u/ha		55–145 u/ha		55–225 u/ha	
2.7–3.0 hr/unit	50–95 u/ha		70–170 u/ha	Up to one space per unit	70–260 u/ha	
Central	**150–300 hr/ha**		**300–650 hr/ha**		**650–1100 hr/ha**	
3.8–4.6 hr/unit	35–80 u/ha	Up to 1.5 spaces per unit	65–170 u/ha		140–290 u/ha	Up to one space per unit
3.1–3.7 hr/unit	40–100 u/ha		80–210 u/ha	Up to one space per unit	175–355 u/ha	
2.7–3.0 hr/unit	50–110 u/hr	Up to one space per unit	100–240 u/ha		215–405 u/ha	

Maximum residential parking standards			
number of beds	4 or more	3	1-2
parking spaces	up to 2 per unit	up to 1.5 per unit	less than 1 per unit

Notes:

All developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit

Adequate parking spaces for disabled people must be provided preferably on-site[1]

20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.

1 Mayor of London. Housing Supplementary Planning Guidance. GLA, 2012. Mayor of London. Accessible London. Supplementary Planning Guidance. GLA, 2014.

- CYCLE PARKING FOR RESIDENTIAL DEVELOPMENT – for ***long-stay***, 1 space per studio and 1 bedroom unit, and 2 spaces for all other dwellings, and for ***short-stay,*** 1 space per 40 units.

- PARKING FOR EMPLOYMENT B1 – Outer London, one space per 100-600 sqm gross floorspace.

- CYCLE PARKING FOR EMPLOYMENT B1 – Outer London, ***long-stay*** 1 space per 150 sqm, ***short-stay*** 1 space per 500 sqm. Where the size threshold has been met, for all land uses in all locations a minimum of 2 short-stay and 2 long-stay spaces must be provided.

National Planning Policy Framework (NPPF)

2.18 The main planning policy documents which provide a context for national sustainable transport is the National Planning Policy Framework (NPPF) July 2018.

2.19 The NPPF sets out key sustainable transport objectives. Promoting sustainable transport is an integral part of transportation policy.

2.20 An extract from section 9 'Promoting Sustainable Transport' of the NPPF July 2018 is set out as follows:

> *"102. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
>
> *a) the potential impacts of development on transport networks can be addressed;*
> *b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
> *c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
> *d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
> *e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places."*
>
> *"103. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."*
>
> *"106. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by*

public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists."

2.21 The following chapter sets out the site's accessibility to transport, parking provision with reference to the Council's parking standards is discussed in Chapter 4.

3.0 SITE ACCESSIBILITY

3.1 The application site is close to Mortlake and East Sheen. The site is therefore within easy access of a wide variety of shops, services and amenities which will be readily accessible to future residents and occupiers and therefore reduce the need to travel by car or own a private car.

3.2 The closest amenities in proximity to the site are a parade of local shops and restaurants on Sheen Lane around 900 metres to the east of the site.

3.3 There are also shops and services on the A205 Upper Richmond Road West to the south of the site including a Tesco Express and a Waitrose, and there is a large Sainsbury's supermarket on the A316 Lower Richmond Road to the west of the site.

3.4 In terms of public transport and in order to demonstrate the accessibility attributes of the application site in the context of its surroundings, an accessibility audit and a public transport accessibility level (PTAL) assessment have been undertaken.

3.5 The PTAL system, widely used by local authorities and the Greater London Authority (GLA), assigns a 'score' to any given location based on the level of public transport accessible from the site within reasonable walk distances and wait times.

3.6 The level of available public transport at a point of interest in London is quantified and measured using Transport for London's (TfL) PTAL model.

3.7 TfL provides an online GIS-based PTAL tool on their website. The GIS-based PTAL tool uses spatial data such as point data files (e.g. bus stops) and vector files (e.g. walking network) to give a specific point of interest's Public Transport Accessibility Index (PTAI) and PTAL score.

3.8 TfL's online GIS-based PTAL tool was used as a basis to research the application site's PTAI and PTAL score. The results indicate that the application site has a PTAL score of 2 which is a 'poor' accessibility rating and of the highest scores achievable as defined by TfL. The full PTAL output files are presented in order in Appendix C.

Table 3 Public Transport Accessibility Levels

PTAL	Range of Index	Map Colour	Description
1a (Low)	0.01 – 2.50		Very poor
1b	2.51 – 5.00		Very poor
2	5.01 – 10.00		Poor
3	10.01 – 15.00		Moderate
4	15.01 – 20.00		Good
5	20.01 – 25.00		Very Good
6a	25.01 – 40.00		Excellent
6b (High)	40.01 +		Excellent

Source: TfL TA Best Practice Guidance April 2010

3.9 A total of six bus services with high hourly service frequencies can be accessed from stops within around 550 metres of the application site. Refer to Figure 2 of this report for a map detailing the locations of nearby public transport access points.

3.10 Local bus services (routes 190, 419, R68, 33, 337 and 493) are detailed in Table 1.

Table 1. Bus Service Details

Start Point	Bus Route	Distance from Site	Bus Route	Vehicles per hour
Lower Richmond Road (Chalkers CNR)	190	332.81	Richmond - Chiswick - Stamford Brook - Hammersmith - West Brompton	15
Lower Richmond Road (Chalkers CNR)	419	332.81	Richmond - Lower Richmond Road - Mortlake - Barnes - Suffolk Road - Howsman Road - Hammersmith	15
Lower Richmond Road (Chalkers CNR)	R68	332.81	Hampton Court - Hampton - Hampton Hill - Teddington - Strawberry Vale - Twickenham - Richmond - Kew Retail Park	15
Homesdale Avenue	33	524.02	Fulwell *Abellio London garage* - Teddington - Twickenham - Richmond - East Sheen - Barnes Common - Hammersmith	8
Homesdale Avenue	337	524.02	Richmond - East Sheen - Barnes Common - Putney - Wandsworth - Clapham Junction	12
Homesdale Avenue	493	524.02	Richmond *Homebase* - Richmond - East Sheen - Roehampton - Putney Heath - Southfields - Wimbledon Park - Church Road - Wimbledon - Gap Road - Plough Lane - Blackshaw Road - Tooting *St. George's Hospital*	12

3.11 All of the local bus stops referenced in Table 1 and Figure 2 will be within a shorter distance of the site with the introduction of the proposed new pedestrian entrance to the site from the A205 Clifford Avenue. This means that future residents and occupiers of the business units will have a shorter walk to access local bus services.

3.12 The site has access to both Mortlake and North Sheen rail stations. Mortlake Rail Station is around 910 metres to the east of the site and North Sheen Rail Station is around one kilometre to the west of the site. Both Mortlake and North Sheen Station are on the Hounslow Loop, Kingston/ Shepperton line and are in the London fare zone 3. These services as detailed in Table 2.

Table 2. Rail Services Details

Rail Service	Destinations
Waterloo to Waterloo	Waterloo- Vauxhall- Clapham Junction- Earlsfield- Wimbledon-Raynes Park- New Malden- Norbtion- Kingston- Hampton Wick- Teddington- Strawberry Hill- Twickenham- St Margarets- Richmond- North Sheen- Mortlake- Barnes

Source: National Rail

3.13 Figure 2 shows the location of Mortlake and North Sheen Rail Station on a map base.

3.14 TfL publishes cycling guides; there are 14 guides in total covering the whole of London. All of the cycle routes presented in the guides have been ridden and recommended by cyclists.

3.15 TfL's Local Cycling Guide 9 covers Richmond upon Thames and the surrounding area. Within each guide, cycle routes are categorised as follows:

- Yellow – routes on quieter roads recommended by cyclists
- Blue – route signed for cyclists that may be on busier roads
- Brown – provision for cyclists adjacent to busy roads
- Light Green – routes through parks for walking
- Green – routes on canal towpaths for walking and cycling

3.16 A review of TfL's Cycle Guide 9 demonstrates that the site is well served by 'yellow', 'green' and 'blue' (refer to paragraph 3.15) cycle routes as defined by TfL.

4.0 PARKING PROVISION & IMPACT

4.1 The proposal involves the redevelopment of the site to provide two three-bedroom and four two-bedroom dwellings and 152 sqm of B1(a) office space. The existing vehicle access will be retained to provide access to one on-site disabled parking bay.

4.2 The scheme provides 14 off-street car parking spaces inclusive of one disabled space. The parking spaces will be served via Kingsway from the existing vehicle entrance.

4.3 The Council's maximum car parking standards for one and two-bedroom dwellings is one space per unit, and two spaces per unit for three or more bedroom dwellings. The maximum car parking standards for B1(a) office use is one space per 100-600 sqm floor space.

4.4 The proposed dwellings would therefore require up to a maximum of eight off-street car parking spaces in accordance with Richmond Council's policy requirements.

4.5 The proposed 152 sqm B1(a) office floor space would require between zero and two off-street parking spaces.

4.6 Of the total parking spaces proposed to be provided, eight will be for the residential dwellings and two will be for the office use. This level of provision meets the maximum policy requirements and is therefore considered to be satisfactory.

4.7 The remaining four parking spaces will be let to local residents to offset any small amount of localised overspill demand for parking arising from the loss of the garages under the proposals.

4.8 In this respect, further clarification has been sought in respect to the existing garages.

4.9 As explained there are 45 units in total. Units 21 to 26 inclusive (seven units in total) comprise of the road arches and are the two existing business units i.e. the timber business and the car mechanic business.

4.10 The remaining number of lock-up garage units is 38, two of which are currently vacant and not in use which leaves 36 lock-up garages with tenants.

4.11 For data protection purposes the addresses of the tenants cannot be shared. The applicant can however confirm that only three existing lock-up garage tenants live within three streets of the site which are on Kingsway, Shalstone Road, and Clifford Avenue (one address per tenant/street).

4.12 All other garage tenants live outside of the three aforementioned roads, the majority do not live in SW14 but come from as far as Wandsworth, Putney, and Richmond etc.

4.13 Of the 36 occupied garages only eight are used for storing vehicles, mainly 'classic' cars which are smaller and narrower than modern vehicles. The remainder are used for storage.

4.14 Only one of the three locally occupied garages are used for storing a private car, the remaining two are used as storage. The removal of these garages will therefore result in an overspill demand for parking of one car.

4.15 Such a low level of potential overspill demand for parking will clearly have a minimal and insignificant impact on the adjoining highway and will likely fall within nightly fluctuations in parking demand and accordingly go unnoticed. Again it must be stressed that this is a worst case and unlikely scenario which is based on all three locally occupied garages being used for parking a private car.

4.16 Based on the Council's maximum parking standards the residential aspect of the proposals would require up to eight off-street parking spaces, however owing to the loss of the garages and the perceived high demand for parking along the local roads the additional four spaces are being provided to offset any small

amount of potential overspill demand. These will be initially offered to the three local garage tenants.

4.17 In summary, the loss of the garages will result in no increase in demand for parking on Kingsway or the other nearby roads adjoining the site. The proposed parking arrangements for the current scheme are identical to those submitted with planning application 16/1507/FUL, and accordingly the precedent for the Council's acceptance of these arrangements is now established.

4.18 In accordance with the Council's minimum cycle parking standards the residential dwellings will require 12 secure and sheltered long-stay cycle parking spaces and the B1(a) office floor space will require two secure and sheltered short-stay cycle parking spaces and two secure short-stay spaces.

4.19 The scheme provides cycle parking in accordance with the Council's minimum standards, as can be seen in Appendix B. The residential aspect of the proposal requires 12 secure and sheltered cycle parking spaces and the B1(a) space requires two secure short-stay and two secure and sheltered long-stay spaces.

5.0 TRIP GENERATION & IMPACT

5.1 An assessment of the current and proposed vehicle trips using the site access is set out in the Transport Statement dated April 2016 which was submitted with planning application 16/1507/FUL.

5.2 Additional traffic related information has also been submitted to the Council in two Technical Notes dated June 2016 and May 2018 as part of the planning application consultation process.

5.3 Full traffic count data from the Access Road leading to the Kingsway Garages is shown in Appendix D.

5.4 Whilst the data was collected in 2014 the site has remained operationally the same since then and is therefore reflective of current conditions at the site. Average weekday traffic count data from the access road is shown in Table 3.

Table 3. Average Traffic Count Data for Kingsway Garages Access Road

Time	Average Weekday Flow		
	Inbound	Outbound	Total
0000-0100	0	0	0
0100-0200	0	0	0
0200-0300	0	0	0
0300-0400	0	0	0
0400-0500	0	0	0
0500-0600	0	0	0
0600-0700	1	0	1
0700-0800	0	0	1
0800-0900	1	1	1
0900-1000	1	1	2
1000-1100	2	1	3
1100-1200	1	1	1
1200-1300	0	1	1
1300-1400	1	1	2
1400-1500	3	3	5
1500-1600	2	2	3
1600-1700	1	1	2
1700-1800	1	1	2
1800-1900	1	1	2
1900-2000	1	1	2
2000-2100	0	0	1
2100-2200	0	1	1
2200-2300	0	0	0
2300-2400	0	0	0
Total	15	15	30

Source: PMA Survey

5.5 The results in Table 3 demonstrates that the access road carries an average of 30 total vehicle movements over the course of a typical weekday, 15 inbound trips and 15 outbound trips.

5.6 The AM peak period occurs from 1000-1100 and the PM peak period from 1400-1500 with three and five total two-way vehicle trips respectively.

5.7 It should also be noted that on Monday 10th and Tuesday 11th July the number of total two-way vehicle trips on the access road were recorded as being 45 and 52 respectively which would imply there is a high variation of the number of trips to the existing site.

Proposed Site Use

5.8 The proposed development will see the redevelopment of the site into six dwellings consisting of four two-bedroom dwellings and two three-bedroom dwellings plus two commercial units under the railway arches.

5.9 The TRICS traffic database has been interrogated to find comparable residential sites in order to project vehicular and person trips relating to the proposed residential development.

5.10 The adopted search criteria for comparison have been primarily based on location, public transport accessibility, parking provision ratio, and the size and type of development. A total of 3 comparable sites have been found to present a robust assessment. The same sites have been selected that were previously submitted with planning application 16/1507/FUL as the data has been deemed as acceptable by the Council in the recent past.

5.11 The following TRICS sites were selected:

- Timber Pond Road, Canada Water, SE16 6RT (SK-03-A-01)
- Coombe Rise, Kingston Upon Thames, KT2 7EX (KI-03-A-01)
- Worsley Close, Kingston Upon Thames, KT2 7ER (KI-03-A-02)

5.12 Table 4 shows total person (all mode) trip projections, Table 5 shows the car driver/vehicle trip projections.

Table 4. Total person (all mode) trip rates and trip projections for 6 dwellings

Time	No of Sites	Trip Rates per dwelling			Projected Trips for 6 dwellings		
		Trip Rate In	Trip Rate Out	Total Trip Rate	Projected Trips In	Projected Trips Out	Projected Total Trips
07:00-08:00	3	0.234	1.149	1.383	1	7	8
08:00-09:00	3	0.234	0.787	1.021	1	5	6
09:00-10:00	3	0.128	0.362	0.49	1	2	3
10:00-11:00	3	0.426	0.34	0.766	3	2	5
11:00-12:00	3	0.34	0.319	0.659	2	2	4
12:00-13:00	3	0.426	0.596	1.022	3	4	7
13:00-14:00	3	0.468	0.064	0.532	3	0	3
14:00-15:00	3	0.34	0.255	0.595	2	2	4
15:00-16:00	3	0.404	0.298	0.702	2	2	4
16:00-17:00	3	0.532	0.362	0.894	3	2	5
17:00-18:00	3	0.34	0.468	0.808	2	3	5
18:00-19:00	3	0.404	0.191	0.595	2	1	3
Total		4.276	5.191	9.467	26	31	57

Table 5. Car driver/vehicle trip rates and trip projections for 6 dwellings

Time	No of Sites	Trip Rates per dwelling			Projected Trips for 6 dwellings		
		Trip Rate In	Trip Rate Out	Total Trip Rate	Projected Trips In	Projected Trips Out	Projected Total Trips
07:00-08:00	3	0.149	0.362	0.511	1	2	3
08:00-09:00	3	0.149	0.213	0.362	1	1	2
09:00-10:00	3	0.106	0.17	0.276	1	1	2
10:00-11:00	3	0.17	0.128	0.298	1	1	2
11:00-12:00	3	0.191	0.106	0.297	1	1	2
12:00-13:00	3	0.234	0.298	0.532	1	2	3
13:00-14:00	3	0.255	0.106	0.361	2	1	3
14:00-15:00	3	0.128	0.191	0.319	1	1	2
15:00-16:00	3	0.213	0.213	0.426	1	1	2
16:00-17:00	3	0.234	0.255	0.489	1	2	3
17:00-18:00	3	0.213	0.128	0.341	1	1	2
18:00-19:00	3	0.17	0.085	0.255	1	1	2
Total		2.212	2.255	4.467	13	15	28

5.13 The results in Table 5 demonstrate that the proposed six dwellings can be expected to generate in the order of 57 total pedestrian and vehicle two-way trips, 26 arrivals and 31 departures, on a typical weekday.

5.14 The busiest AM period is projected to occur from 0700-0800 whereby the proposal can be expected to generate eight total trips, one arrival and seven departures. The busiest PM period is projected to occur from 1200-1300

whereby the proposal can be expected to generate a total of seven trips, three arrivals and four departures.

5.15 Out of total vehicle and pedestrian 57 trips, 28 are to be made by car, this makes up 49% of all trips.

5.16 The number of vehicle trips generated by the proposed six new dwellings is expected to be fairly evenly spread throughout a typical day; even in the peak period only three total vehicle movements are expected to occur in one hour which equates to a one-way trip every 20 minutes.

5.17 There are two designated parking spaces for the commercial units. Therefore over the course of the day we expect there to be four trips attributed to the commercial units.

Traffic Impact

5.18 This section focuses on the vehicle traffic impact of the proposed development on the adjoining highway.

5.19 The site's extant uses have been projected to generate a total of 30 two-way vehicle trips on a typical weekday, 15 arrivals and 15 departures. This is however a conservative estimate of the existing site's trip generating potential as the busiest day recorded by the survey had 52 total two-way vehicle trips.

5.20 The proposed six dwellings and two office units will be expected to generate in the order of 32 total vehicle trips, 15 arrivals and 18 departures, to and from the site on a typical weekday as derived from the TRICS data.

5.21 The proposal is therefore projected to result in a worst case scenario net increase of two total two-way vehicle trips to the site throughout a typical weekday compared to the average number of vehicle trips recorded on the access road. However the proposal will generate 20 fewer total two-way

vehicle trips, which is 38% less, when compared against the highest recorded two-way vehicle trips on the access road.

5.22 It is expected that the extant employment/commercial based uses would generate more peak period vehicle trips than the proposed mixed use development, and more servicing related trips in larger vehicles such as transit vans.

5.23 The development is therefore expected to have a minimal and insignificant on the adjoining highway in terms of highway capacity, road safety, and neighbouring amenity.

6.0 ACCESS & SERVICING

Access

6.1 The minimum width of the access is 2.7 metres however this is only at a specific point by a downpipe to an adjoining dwelling, the remainder of the access road is in excess of 3 metres wide.

6.2 The 'narrow' section of the driveway extends some 25 metres from the Kingsway footway to the proposed wider section within the site. Applying the average 80 metres per minute walk speed this would take 18 seconds for someone to walk.

6.3 The vehicle trip generation predictions for the proposed six residential dwellings and the office accommodation as referenced in the previous chapter demonstrates that no more than four total two-way vehicle trips will be generated by the development in any given hour on a typical weekday, equating to around one vehicle movement every 15 minutes in the busiest periods and significantly less at all other times. The likelihood therefore of a vehicle waiting for another vehicle to pass along the access road before entering or a vehicle waiting for a pedestrian/cyclist to pass before entering is extremely low.

6.4 Notwithstanding the anticipated very low traffic flow on the access road the proposals include the introduction of a traffic light system on the access road. The signal head at the entrance to the site would continuously show a green light except when the internal sensor detects a vehicle leaving the site at which point the signals would automatically switch allowing the exiting vehicle to leave safely. The implementation of this system would avoid any instances of vehicles having to wait on Kingsway and thus causing an obstruction, which is currently the case and may require a vehicle to back up.

6.5 In order to eliminate instances of a vehicle passing a pedestrian or a cyclist along the driveway it is proposed that the traffic light system includes an additional pedestrian and cyclist radar detection. There are products on the market which

have been designed for the detection and monitoring of pedestrians and cyclists on the highway at signalled installations and other applications where the detection of moving pedestrians is required. Details of the vehicle and pedestrian traffic management system can be adequately secured as a condition of any future planning permission.

6.6 It is noted that the Council has remained concerned in the past regarding the width of the driveway and a vehicle passing a pedestrian on the driveway.

6.7 An additional mitigating measure which is proposed to be implemented under the proposals to reduce the number of pedestrians using the driveway is to provide a new pedestrian access via Clifford Avenue. The planned new pedestrian entrance to/from Clifford Avenue is presented on a plan at Appendix B of this report.

6.8 The access via Clifford Avenue provides a shorter link to the bus stops and shops and services to the south of the site on Upper Richmond Road West as well as the bus stops to the north of the site on Lower Richmond Road.

6.9 There is a precedent for a stepped pedestrian entrance to Clifford Avenue on the opposite side of the road. The existing stepped pedestrian entrance serves access to the residential dwellings to the west of the site at Lambert Avenue etc.

6.10 It must be borne in mind that the existing site uses have the potential to generate significant numbers of vehicular and pedestrian trips to and from the site over the course of a typical week. For example the existing timber business and the car repair workshop would generate a steady number of operational vehicle trips from vans etc as well as staff and customer/visitor trips over the course of a typical weekday. There are also 38 lock-up garages, 36 of which are currently let-out, which would be accessed by the occupiers at any point in time.

6.11 We have reviewed the personal injury accident (PIA) data contained on the CrashMap website. CrashMap uses data collected by the police about road traffic crashes occurring on British roads where someone is injured. This data is

approved by the National Statistics Authority and reported on by the Department for Transport each year. Incidents are plotted to within 10 metres of their location. The CrashMap website confirms that there have been no PIA's at the junction of the site's driveway with Kingsway, or along Kingsway or Shalstone Road in the past 19 years since 1999 which is as far back as the data is held.

6.12 Accordingly it is evident that the site's driveway junction with Kingsway and the roads immediately adjoining the site have an excellent safety record. There are no accident black spots or trends in accidents that might otherwise suggest that there are inherent safety issues with the use of the existing vehicle access and the movement of vehicles and pedestrians to/from the site via the public highway.

6.13 In summary based on the information presented herein and the detailed information contained in the Transport Statement submitted with the planning application it is our professional view that the proposals are entirely safe and satisfactory on highways grounds. The development is not expected to result in conditions prejudicial to free flowing traffic on the adjoining highway, to highway safety, or to neighbouring amenity and the application should be approved.

6.14 The site access will be completely re-surfaced and designed with shared surface principles. In a street with a shared surface, demarcation is typically absent and pedestrians and vehicles share the same surface. According to the Department for Transport (DfT) publication Manual for Streets (MfS) shared surface schemes work best in relatively calm traffic environments. The key aims (as defined by MfS) are to: encourage low vehicles speeds, create an environment in which pedestrians can walk, stop and chat, and promote social interaction.

6.15 According to MfS (paragraph 7.2.14), shared surfaces are ideal in the following circumstances:

- in short lengths, or where they form cul-de-sacs;

- where the volume of motor traffic is below 100 vehicles per hour (vph) (peak); and
- where parking is controlled or it takes place in designated areas.

6.16 The proposed development meets all of the criteria where shared surfaces are known to work best, as defined by MfS. The access road will be constructed with paviours rather than asphalt. Research in MfS illustrates that block paviours reduce traffic speeds by between 2.5 to 4.5 mph compared to asphalt.

6.17 Additional design features for the access road which would be implemented by the applicant and would secured by the Council as a condition of any future planning permission include:

- Speed bump(s) if necessary;
- CCTV with memory recall;
- Low level lighting; and
- A scheme of signage ("5mph", "pedestrian priority" etc).

Servicing

6.18 As explained in previous documents, it is our professional view that the proposed development will in all likelihood result in a net reduction in vans/service type vehicles accessing the site over the course of a typical week.

6.19 One of the road arch business units is currently occupied by a timber business and therefore associated lorries carrying fence panels etc arrive and depart throughout a typical day. The other road arch commercial unit is occupied by a car mechanic business which generates a demand for multiple deliveries throughout a typical day by courier type vans delivering spare parts for cars. The mechanic business does not carry out MOT's on-site and therefore cars are taken to a separate depot which generates further vehicle movements both on the access road and on Kingsway itself.

6.20 The proposals will see the existing commercial uses in the road arch units and the remaining 38 lock-up garages removed and the site developed to comprise of two three-bedroom and four two-bedroom dwellings plus a modest 152 sqm floor area of B1(a) office space.

6.21 It is therefore evident that the current use of the site would generate a greater demand for servicing trips (deliveries / couriers etc), particularly during daytime hours, than the proposed use.

6.22 The proposed office units would generate infrequent demand by say transit type courier vans and the residential units may generate demand for say food deliveries, the frequency of which would be much less than the existing site uses and the timing more likely to occur outside of peak hours.

6.23 Based on research a typical home food delivery type vehicle such as those used by Asda is made using an Iveco Daily 35S11. This type of vehicle would be able to enter, turn, and exit the site as is the case per the current arrangements.

6.24 Figure 3 of this report illustrates the vehicle swept paths of a 4.6 tonne Sprinter type transit van entering and exiting the site in a forward gear. The van used in the vehicle tracking exercise is larger than an Iveco Daily 35S11 and is likely to be the largest type of vehicle that can comfortably access the site. An internal loading area and turning space is provided under the proposals as shown in Appendix B.

6.25 If necessary the existing white line across the entrance to the access could be extended slightly further towards the west to allow easier egress for vans, this is something that the Council could easily provide without detriment to the availability of kerb side parking locally.

6.26 As has already been explained in the previous submission it is proposed that refuse will be dealt with via a privately contracted arrangement. A privately contracted company might have a refuse vehicle that could physically enter the site, however even if this is not possible they would not be bound by trundle

distances and would therefore be able to service the site from the street. Given the small scale of the development it is entirely likely that refuse would be collected once weekly or fortnightly and therefore any disruption to free flowing traffic on Kingsway would be extremely infrequent.

6.27 Given that waste collection already occurs from the kerb for the vast majority of properties on Kingsway adjoining the site the proposed arrangement is considered to be satisfactory and would not result in any undue harm to existing traffic flow and highway safety. The Council accepts that the refuse strategy for the site is something that would need to be secured by condition.

7.0 OUTLINE CONSTRUCTION LOGISTICS

7.1 Construction Logistics Plans (CLPs), sometimes referred to by other titles, are often secured as a condition of planning consent by local planning / highway authorities.

7.2 Generally speaking CLPs contain some or all of the following information with regards to the demolition and construction phases of new development:

- Overview of the development site – explains where the site is located, its points of access, existing situation and nature of the development;
- Forecast of possible trip generation – to identify the potential phased impact of delivery and waste removal trips on the road network and environment without the use of mitigation measures;
- Summary of policies and procedures – all the written guidance the developer will use during construction;
- Site operations and access – to show how the policies and procedures will reduce the number and impact of construction trips;
- Management of the CLP – practical day-to-day overview of how the CLP will be managed;
- Contractual relationships and obligations of sub-contractors – these should be set out in writing before work on the construction site starts;
- Monitoring compliance, reporting and review – to identify how delivery activity and compliance with the CLP contractual requirements will be monitored and reported.

7.3 At this very early stage of the development proposals, i.e. before planning permission has been granted by the local planning authority and well before a contractor has been appointed, there is a limit to the detail that can be provided in respect of demolition and construction logistics of this development.

7.4 However it is the intention of this chapter to set out a broad-brush idea of how the constraints of the site will be managed during the demolition and construction phases.

7.5 There are extant businesses, a car repair workshop and a timber business, currently operating from units within the application site and these uses regularly generate trips by transit type vans to and from the site.

7.6 It is therefore evident that demolition/construction related vehicles such as a 3.5 tonne Ford Transit tipper truck will be able to access the site during the works programme.

7.7 During the demolition stage of the development the site will need to be cleared and prepared for the construction of the new dwellings. Any spoil and debris which cannot be reused will need to be removed from the site. Transit type tipper truck could be used akin to the one pictured below:

7.8 During the construction stage of the development goods, materials, and equipment will need to be delivered to the site. The majority if not all deliveries will be able to be made by anything up to 4.6 tonne transit type vans (ingress and egress swept paths of which are illustrated in this report) and open backed/tipper type 5.0 tonne vehicles such as those pictured as follows:

7.9 There will be a commitment to appoint a CLP coordinator who will likely be a site based foreman/manager from the appointed contractor company. It will be the duty of the CLP coordinator to ensure that all demolition and construction related traffic is made using vehicles that are able to drive into and out of the site in a forward gear.

7.10 Within the site sufficient space will be available for all demolition and construction related vehicles to be able to three-point-turn and exit the site in a forward gear.

7.11 A wheel washing facility will be installed at the site from the outset of commencement of the development to ensure that vehicles do not deposit dirt and debris onto the adjoining highway.

7.12 As discussed, full details of the demolition and construction traffic management procedures will be set out in a standalone report which will be secured by the Council as a condition of planning consent. The contractor and any sub-contractors would then be legally bound by the initiatives set out in the agreed CLP.

8.0 SUMMARY

8.1 To summarise, the proposal comprises of the demolition of the existing lock-up garages and the erection of six residential units (two three-bedroom and four two-bedroom houses), incorporating two commercial (B1a offices) units totalling 152 sqm, with amenity space, 14 off-street car parking spaces and associated works.

8.2 The proposal includes the formation of a new secure pedestrian entrance to the site from the A205 Clifford Avenue on the eastern boundary, the pedestrian entrance will provide steps plus a hoist for pushchairs and wheelchair users.

8.3 The existing entrance to the site from Kingsway will be maintained and substantially enhanced under the proposals. The access will be fully resurfaced from Kingsway into the site to comprise of a high quality shared surface driveway with a separate at-grade footpath, low level lighting, and a traffic (vehicle, cyclist, and pedestrian) signal control system. The driveway will also be made wider as it leads into the site, therefore the narrower section of the access will be reduced in length from 35 metres to only around 25 metres.

8.4 The site is within close proximity to six different bus routes with high peak period service frequencies. All of the local bus stops referenced in Table 1 and Figure 2 of Chapter 3 will be within a shorter distance of the site with the introduction of the proposed new pedestrian entrance to the site from the A205 Clifford Avenue. This means that future residents and occupiers of the business units will have a shorter walk to access local bus services. The site is also close to North Sheen and Mortlake Train Stations.

8.5 The scheme provides 14 off-street car parking spaces inclusive of one disabled space. The Council's maximum car parking standards for one and two-bedroom dwellings is one space per unit, and two spaces per unit for three or more bedroom dwellings. The maximum car parking standards for B1(a) office use is one space per 100-600 sqm floor space.

8.6 Of the total parking spaces proposed to be provided, eight will be for the residential dwellings and two will be for the office use. This level of provision meets the maximum policy requirements and is therefore considered to be satisfactory. The remaining four parking spaces will be let to local residents to offset any small amount of localised overspill demand for parking arising from the loss of the garages under the proposals.

8.7 The loss of the garages will result in no increase in demand for parking on Kingsway or the other nearby roads adjoining the site. The proposed car parking arrangements for the current scheme are identical to those submitted with planning application 16/1507/FUL, and accordingly the precedent for the Council's acceptance of these arrangements is now established.

8.8 Cycle parking is also provided for the scheme in accordance with the Council's minimum requirements.

8.9 The proposal is projected to result in a worst case scenario net increase of two total two-way vehicle trips to the site throughout a typical weekday compared to the average number of vehicle trips recorded on the access road. However the proposal will generate 20 fewer total two-way vehicle trips, which is 38% less, when compared against the highest recorded two-way vehicle trips on the access road.

8.10 It is expected that the extant employment/commercial based uses would generate more peak period vehicle trips than the proposed mixed use development, and more servicing related trips in larger vehicles such as transit vans.

8.11 The development is therefore expected to have a minimal and insignificant on the adjoining highway in terms of highway capacity, road safety, and neighbouring amenity.

8.12 In order to eliminate instances of a vehicle passing a pedestrian or a cyclist along the driveway it is proposed that the vehicle traffic light system includes an

additional pedestrian and cyclist radar detection. There are products on the market which have been designed for the detection and monitoring of pedestrians and cyclists on the highway at signalled installations and other applications where the detection of moving pedestrians is required. Details of the vehicle and pedestrian traffic management system can be adequately secured as a condition of any future planning permission.

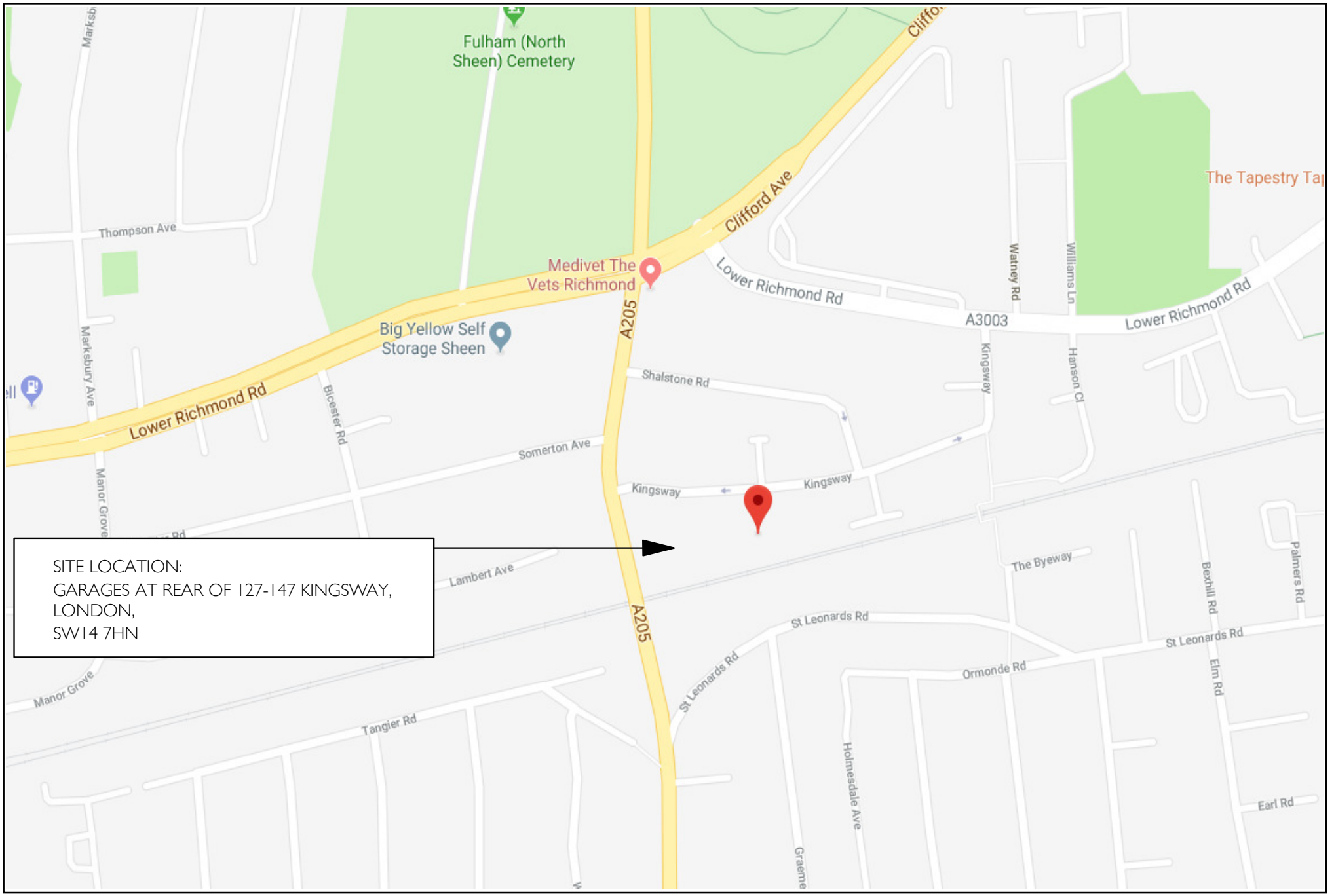
8.13 The 'narrow' section of the driveway extends some 25 metres from the Kingsway footway to the proposed wider section within the site. Applying the average 80 metres per minute walk speed this would take 18 seconds for someone to walk. Based on trip generation predictions for the proposal the likelihood of a vehicle waiting for another vehicle to pass along the access road before entering or a vehicle waiting for a pedestrian/cyclist to pass before entering is extremely low.

8.14 It is proposed that refuse will be dealt with via a privately contracted arrangement.

8.15 In terms of delivery vehicle access a 4.6 tonne Sprinter type transit van will be able to enter and exit the site in a forward gear, as is currently the case. An internal loading area and turning space is provided under the proposals.

8.16 Full details of the demolition and construction traffic management procedures will be set out in a standalone Construction Logistics Plan (CLP) which will be secured by the Council as a condition of planning consent. The contractor and any sub-contractors would then be legally bound by the initiatives set out in the agreed CLP.

FIGURES



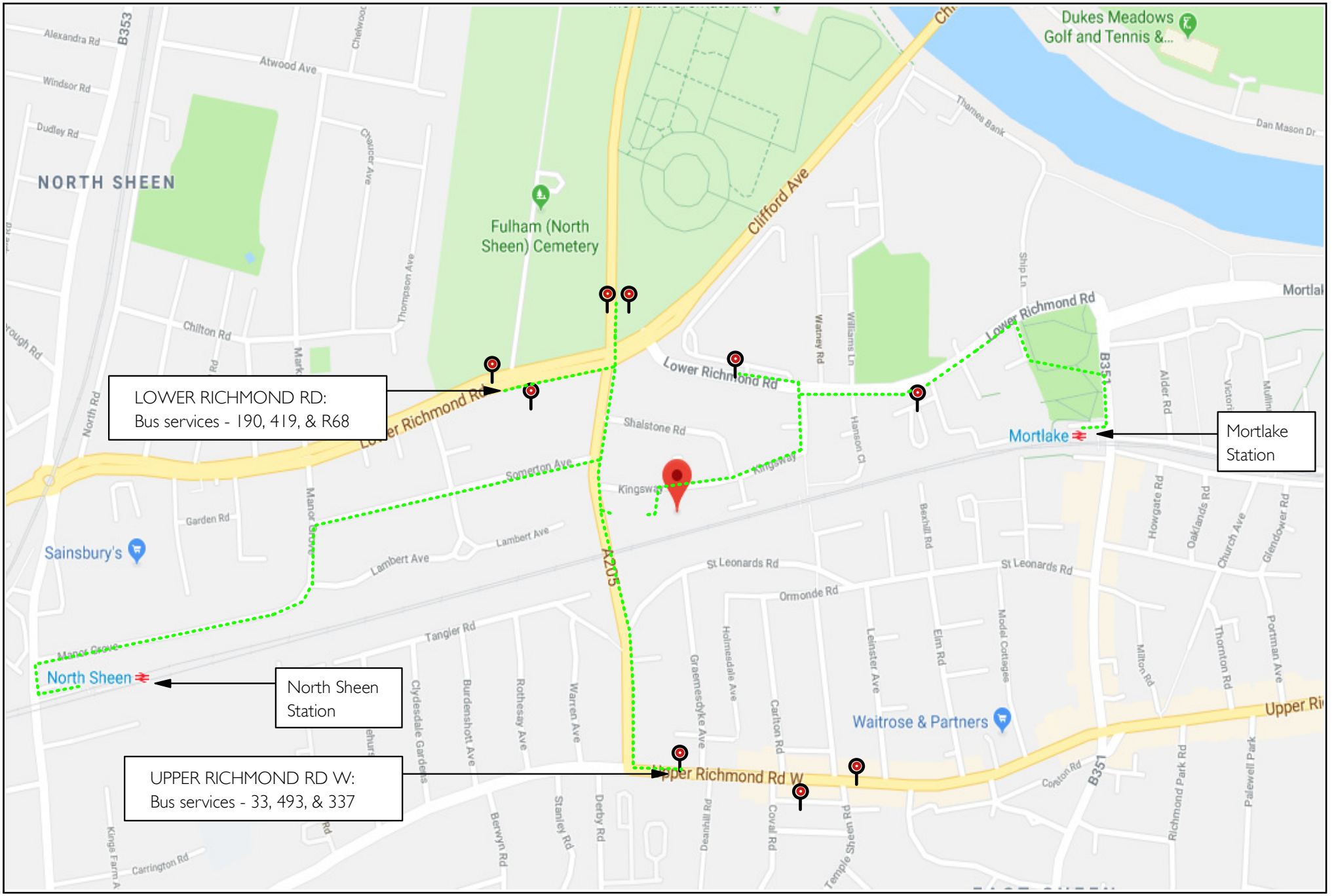
Date: 18-February-2019
Scale: NTS
Source: Google Maps
Drawing No: P1239/TS/01

N

P1239: KINGSWAY MEWS, LONDON, SW14 7HN

Figure 1.
Site Location

PAUL MEW ASSOCIATES
TRAFFIC CONSULTANTS



Date: 18-February-2019
Scale: NTS
Source: Google Maps
Drawing No: P1239/TS/02

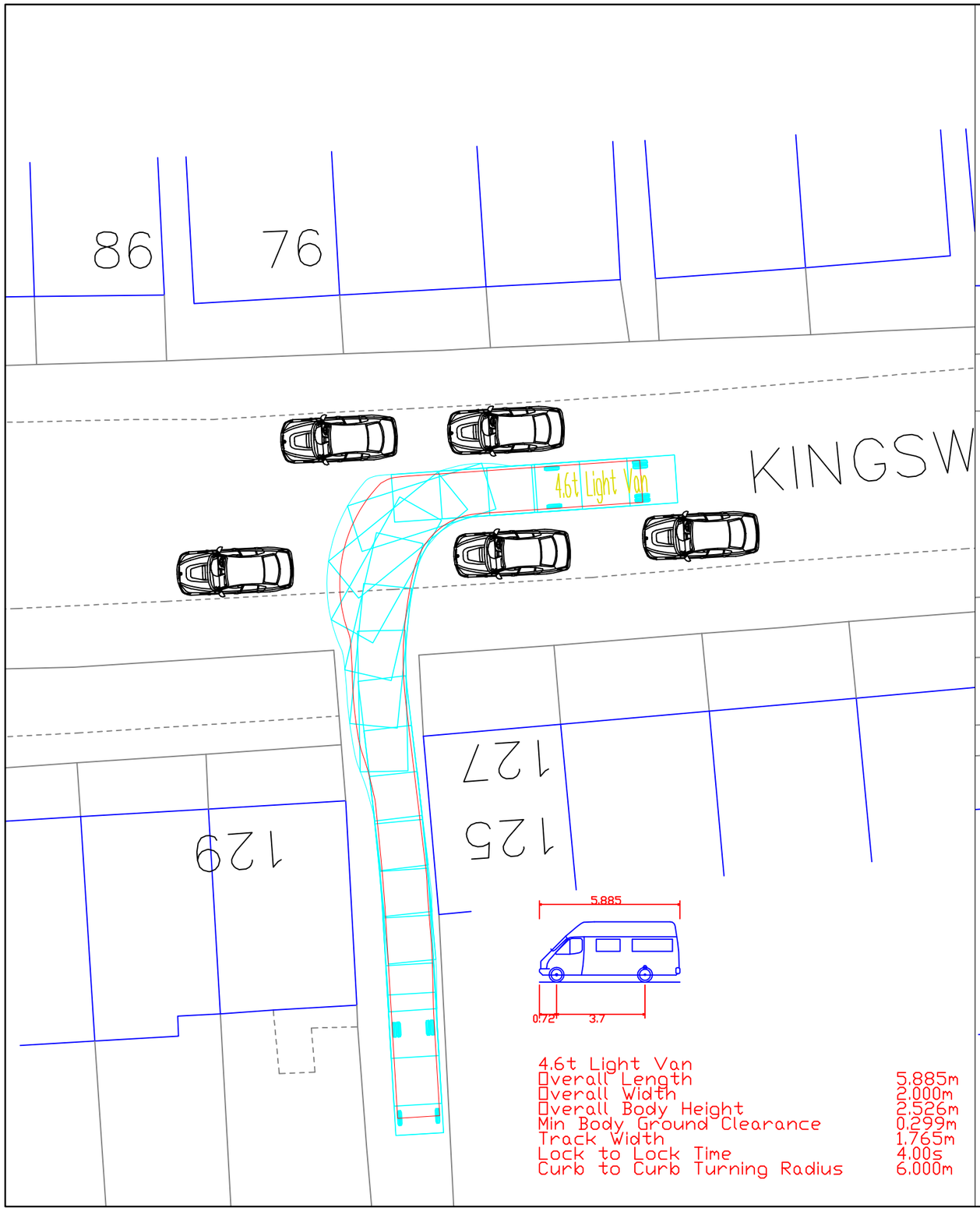
N

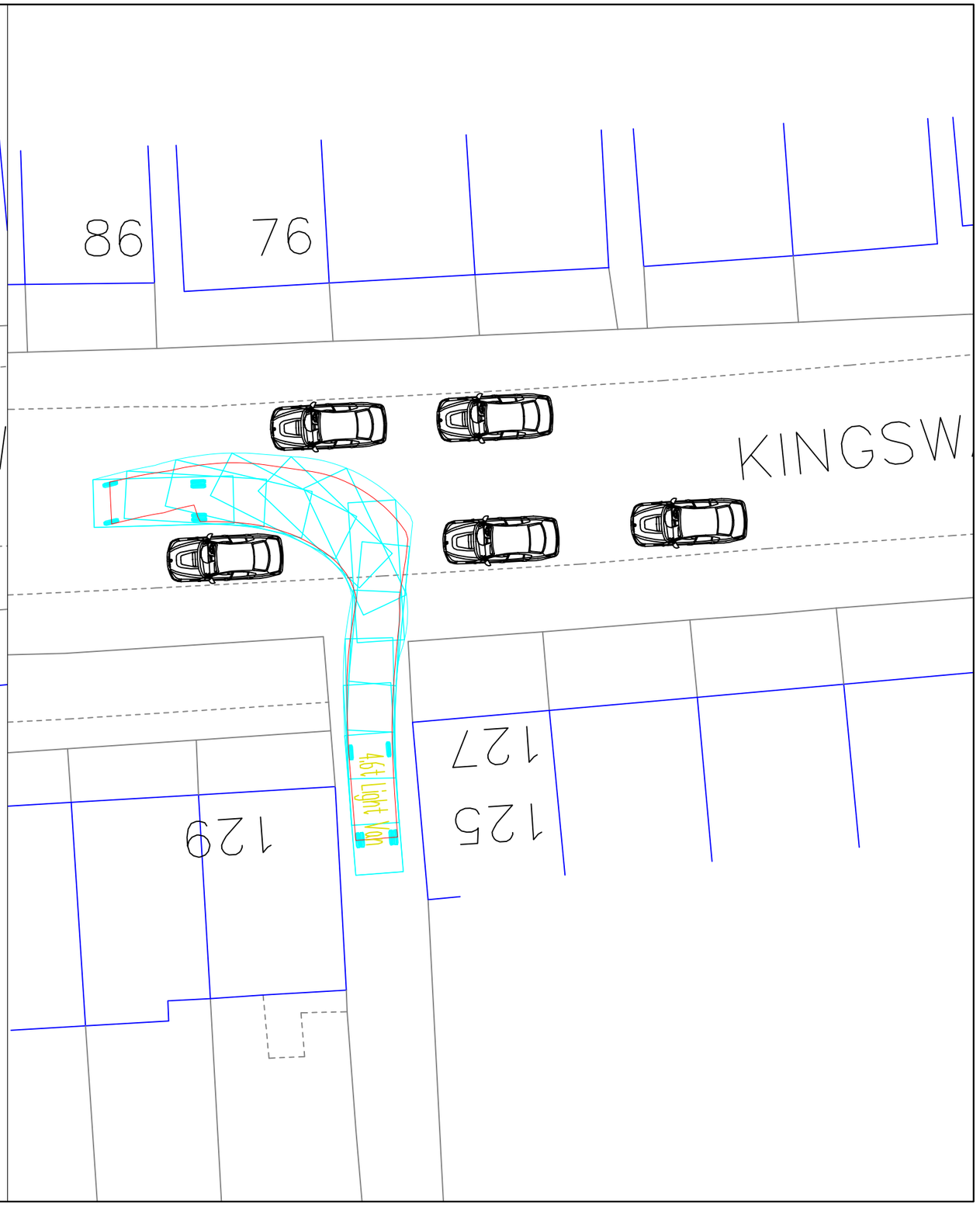
P1239: KINGSWAY MEWS, LONDON, SW14 7HN

Figure 2.

Public Transport Access Map

PAUL MEW ASSOCIATES
TRAFFIC CONSULTANTS





Date: 18-February-2019
Scale: 1:200@A3
Source: OS/PMA
Drawing No. P1239/TS/03

N

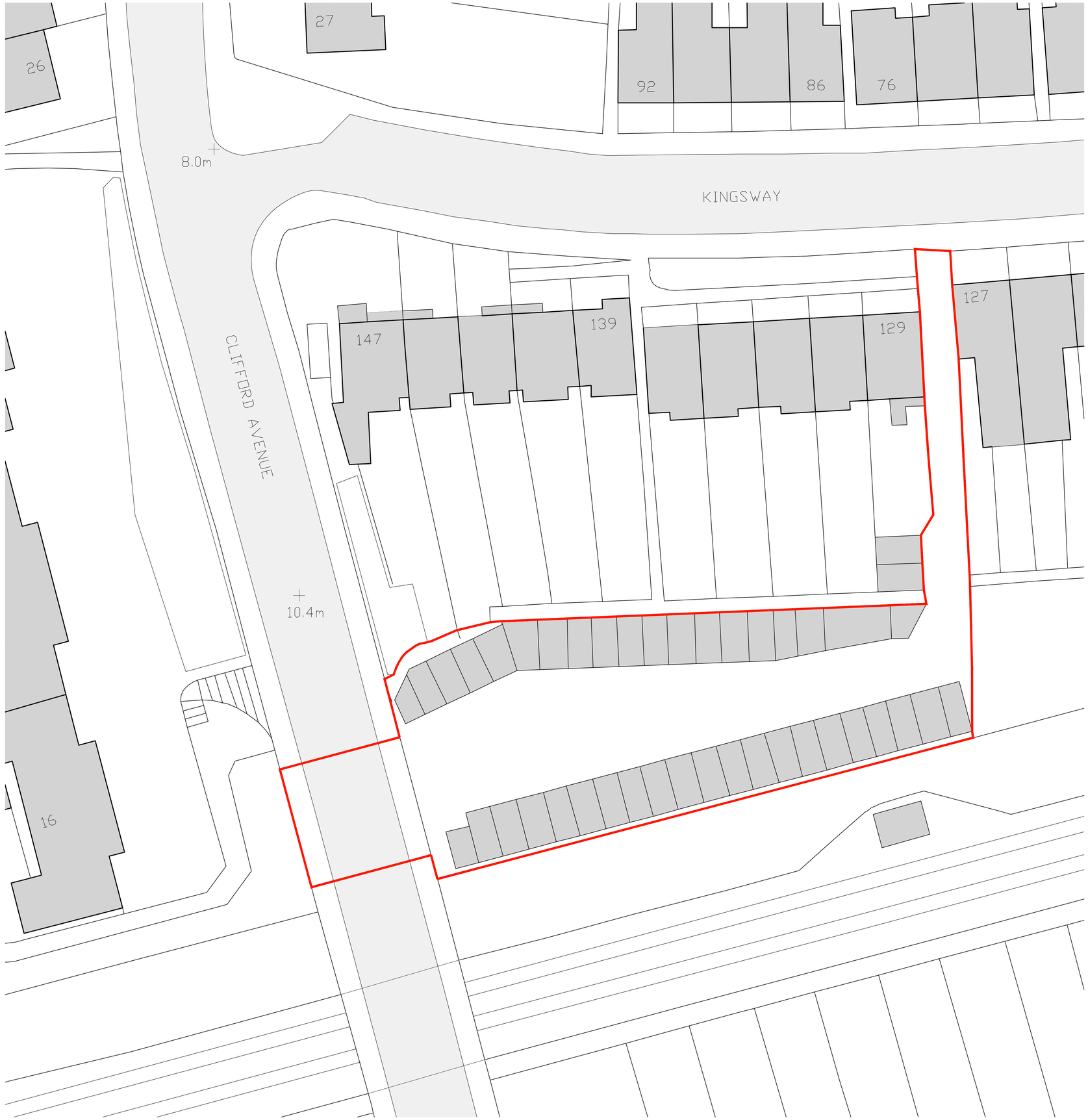
P1239: KINGSWAY MEWS, EAST SHEEN, SW14 7HN

Figure 3.

AutoTrack; 4.6 tonne Van Entering (Left) and Exiting (Right) the Site from Kingsway

PAUL MEW ASSOCIATES
TRAFFIC CONSULTANTS
Unit 1, Plym House, 21 Enterprise Way, London, SW18 1FZ
Tel: 020 8780 0426
E-mail: paul.mew@pma-traffic.co.uk Website: www.pma-traffic.co.uk

APPENDIX A
Site Boundary



Do not scale from this drawing

N

Site Boundary

0 10m 20m

PLANNING

Rev	Description	Issued	Dwn	Chk
A	Drawings Issued For Planning	15.02.19	US	IF

Client

Space Solutions (UK) Ltd

Project

Land rear of Kingsway
London SW14 7HN

Drawing

Site Location Plan

Scale	Date	Drawn	Checked
1:200 @ A1	Feb '19	US	CH

BrookesArchitects

Upstairs at The Grange, Bank Lane,
London SW15 5JT

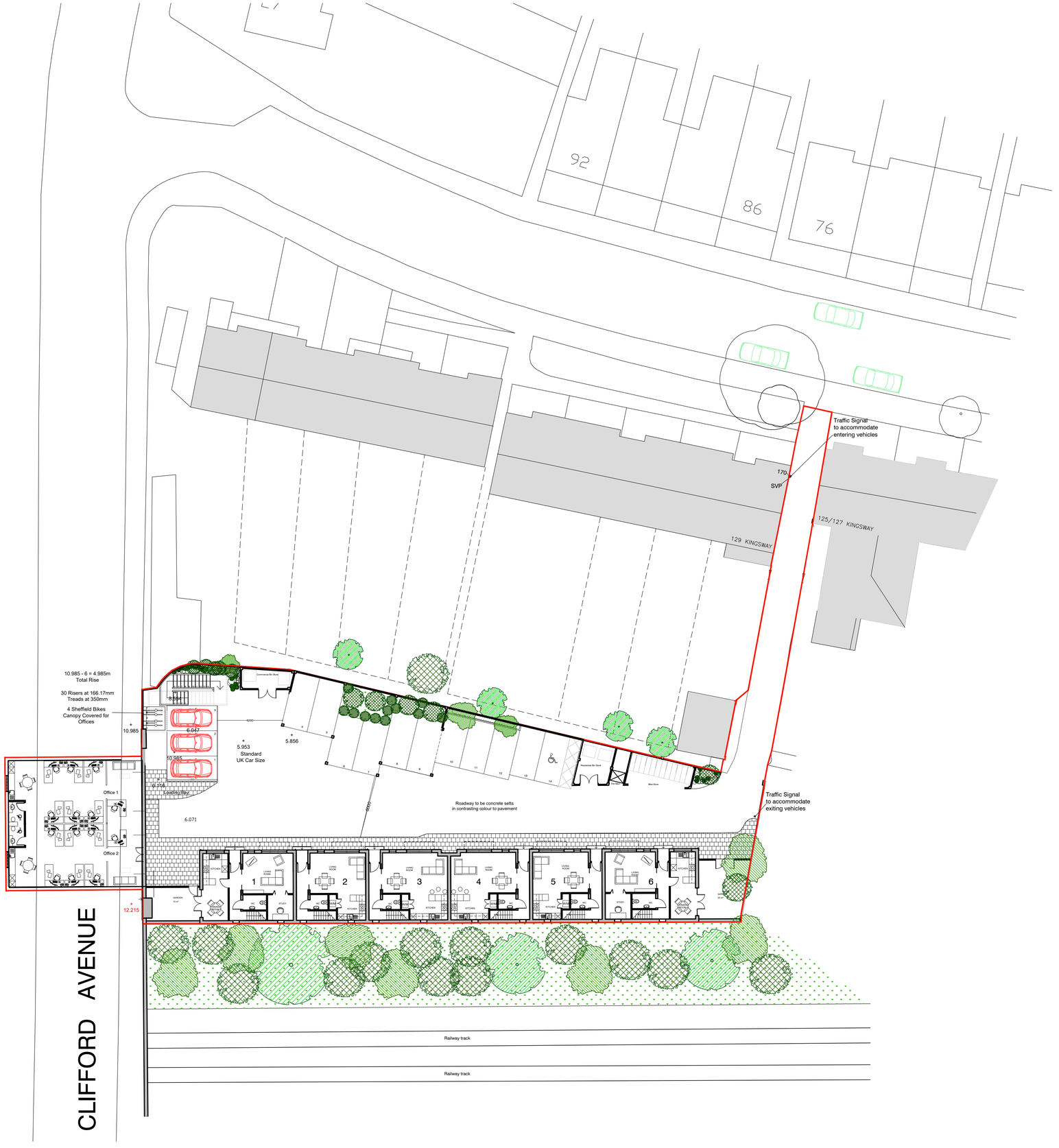
T 020 8487 1223
F 020 8876 4172
E info@brookesarchitects.co.uk

www.brookesarchitects.co.uk

Drawing No.			Rev No.
4594	2	020	A

APPENDIX B
Proposed Site Plan

Do not scale from this drawing



N

Site Boundary

0 10m 20m

PLANNING

Rev	Description	Issued	Dwn	Chk
A	Drawings Issued For Planning	15.02.19	US	IF

Client

Space Solutions (UK) Ltd

Project

Land rear of Kingsway
London SW14 7HN

Drawing

Proposed Site Plan

Scale	Date	Drawn	Checked
1:200 @ A1	Feb '19	US	CH

BrookesArchitects

Upstairs at The Grange, Bank Lane,
London SW15 5JT

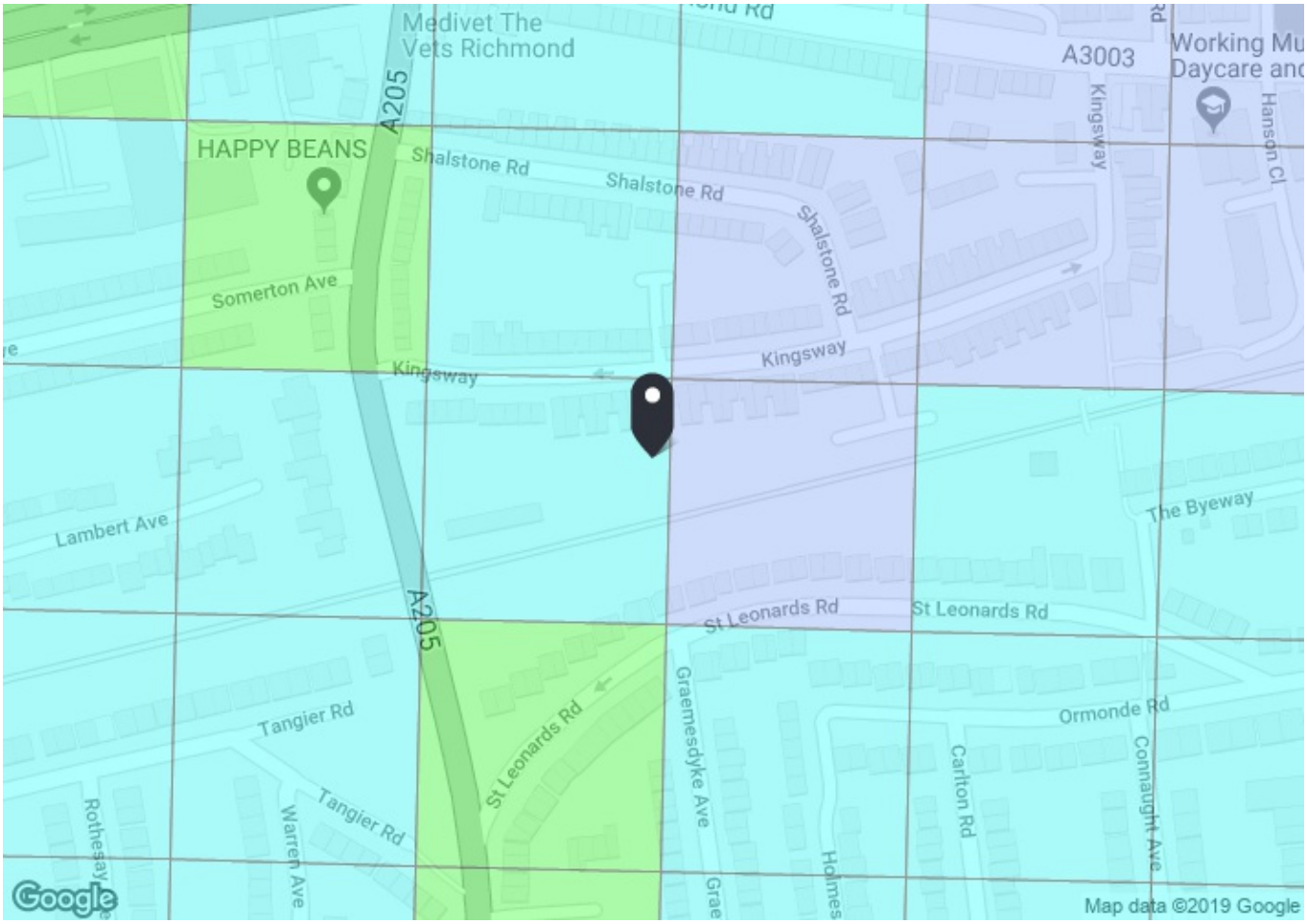
T 020 8487 1223
F 020 8876 4172
E info@brookesarchitects.co.uk

www.brookesarchitects.co.uk

Drawing No.			Rev No.
4594	3	022	A

APPENDIX C
TfL PTAL Site Plan

TRANSPORT FOR LONDON



PTAL output for Base Year
2

SW14 7HN
Kingsway London SW14 7HN, UK
Easting: 519890, Northing: 175661

Grid Cell: 56569

Report generated: 15/02/2019

Map key - PTAL

0 (Worst)	1a
1b	2
3	4
5	6a
6b (Best)	

Map layers

PTAL (cell size: 100m)

Calculation Parameters

Day of Week	M-F
Time Period	AM Peak
Walk Speed	4.8 kph
Bus Node Max. Walk Access Time (mins)	8
Bus Reliability Factor	2.0
LU Station Max. Walk Access Time (mins)	12
LU Reliability Factor	0.75
National Rail Station Max. Walk Access Time (mins)	12
National Rail Reliability Factor	0.75

Calculation data

Mode	Stop	Route	Distance (metres)	Frequency(vph)	Walk Time (mins)	SWT (mins)	TAT (mins)	EDF	Weight	AI
Bus	L RICH'D RD CHALKERS CNR	190	392.1	4	4.9	9.5	14.4	2.08	0.5	1.04
Bus	L RICH'D RD CHALKERS CNR	419	392.1	4	4.9	9.5	14.4	2.08	0.5	1.04
Bus	L RICH'D RD CHALKERS CNR	R68	392.1	4	4.9	9.5	14.4	2.08	0.5	1.04
Bus	HOLMESDALE AVENUE	33	583.32	7.5	7.29	6	13.29	2.26	1	2.26
Bus	HOLMESDALE AVENUE	493	583.32	5	7.29	8	15.29	1.96	0.5	0.98
Bus	HOLMESDALE AVENUE	337	583.32	5	7.29	8	15.29	1.96	0.5	0.98
									Total Grid Cell AI:	**7.34**

APPENDIX D
ATC Data for the Kingsway Garages Access Road

P1239: Kingsway Road Access Road ATC Survey Data

Total Vehicle Flows - 7th July to 14th July 2014

Time	Friday 07/07/2014		Saturday 08/07/2014		Sunday 09/07/2014		Monday 10/07/2014		Tuesday 11/07/2014		Wednesday 12/07/2014		Thursday13/07/2014		Friday 14/07/2014	
	Inbound	Outbound	Inbound	Outbound	Inbound	Outbound	Inbound	Outbound	Inbound	Outbound	Inbound	Outbound	Inbound	Outbound	Inbound	Outbound
0000-0100	***	***	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0100-0200	***	***	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0200-0300	***	***	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0300-0400	***	***	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0400-0500	***	***	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0500-0600	***	***	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0600-0700	***	***	1	0	0	0	1	0	1	0	0	0	0	0	0	1
0700-0800	***	***	0	1	1	0	0	0	0	0	1	0	0	1	1	0
0800-0900	***	***	0	0	0	0	1	0	2	2	0	0	0	0	1	1
0900-1000	***	***	3	2	2	1	3	3	2	1	0	0	0	0	1	1
1000-1100	***	***	3	2	1	1	1	1	5	3	0	0	0	1	0	1
1100-1200	***	***	1	1	1	0	1	1	0	0	0	0	1	2	0	0
1200-1300	***	***	1	3	3	4	0	0	1	2	0	0	0	0	4	1
1300-1400	***	***	3	2	2	2	1	1	2	2	0	0	1	0	***	***
1400-1500	0	0	2	1	1	0	4	3	3	4	3	2	1	1	***	***
1500-1600	0	0	5	4	1	1	3	3	3	2	0	0	1	1	***	***
1600-1700	0	0	1	2	1	2	2	2	2	1	0	0	1	1	***	***
1700-1800	0	0	0	0	2	1	2	0	2	3	0	1	0	0	***	***
1800-1900	1	2	2	3	1	2	1	2	2	2	0	0	0	1	***	***
1900-2000	1	2	1	1	2	1	2	2	2	3	0	0	0	0	***	***
2000-2100	2	0	0	3	0	0	0	1	0	0	0	0	1	0	***	***
2100-2200	0	0	0	1	0	1	1	3	0	0	0	0	0	0	***	***
2200-2300	0	0	0	0	0	1	0	0	0	0	0	0	1	0	***	***
2300-2400	0	0	0	0	0	0	0	0	0	0	0	0	0	0	***	***
Total	***	***	23	26	18	17	23	22	27	25	4	3	7	8	***	***

Values illustrate total vehicle flows

*** indicates the time before the ATC unit was installed

Source: PMA Survey