

8 March 2021

Ashley Russell
 Principal Strategic Planner, Development Management
 GREATER LONDON AUTHORITY
 City Hall
 The Queen's Walk
 London
 SE1 2AA

Dear Ashley Russell,

RE: Consultation on revised documents for planning applications relating to The Stag Brewery, Lower Richmond Road, Mortlake, London, SW14 7ET; and Chalkers Corner Junction at the Junction of Lower Richmond Road, South Circular and Clifford Avenue, Richmond; in the London Borough of Richmond upon Thames.

GLA ref: GLA 4172, 4172a & 4172b

LPA ref: 18/0547/FUL; 18/0458/FUL and 18/0549/FUL

1. Introduction:

- 1.1 Thank you for the email consultation notification, dated 8 February 2020, regarding the abovementioned planning applications.
- 1.2 To summarise the history, following the call in of Applications A, B and C in May 2020; the GLA consulted on a revised scheme in July and September 2020. The Council submitted their response on 29 October 2020 (Appendix 1). Whilst aspects of the development were supported, the following objections were raised (refer to original letter for full details):

Table 1: Summary of objections to the July 2020 scheme

Application A	Affordable Housing	<ul style="list-style-type: none"> a) Quantum of onsite affordable housing provision b) Tenure mix c) Phasing and delivery of affordable housing d) Clarification regarding - affordability, viability, oversized units, grant funding
	Design and height	<ul style="list-style-type: none"> a) Density of the development, demonstrated by the unacceptable height and subsequent impact on the character of the site and area b) Impact on heritage assets, views, Thames Policy Area, MOL and residential amenity c) Poor juxtaposition of buildings within the site d) Elevational treatments e) Matters of clarification - Inconsistencies between documents; suitability of Outline applicant given height and heritage assets; lack of design scrutiny and lack of clarity in Design Code

	Living Standards	<ul style="list-style-type: none"> a) Insufficient space between buildings and impact on quality of accommodation b) Insufficient detail on wheelchair accessible homes.
	Playspace	Quality and location
	Residential amenity	<ul style="list-style-type: none"> a) Visual impact and privacy – relationship with Reid Court, Parliament Mews, Leyden House, The Old Stables and Thames Bank House and Aynescombe Cottage b) Loss of daylight – Boat Race House, 31 Vineyard Path; Reid Court, Parliament Mews, Thames Bank House and Cottage; 3-9 Lower Richmond Road and Old Stables.
	Transport	<ul style="list-style-type: none"> a) Transport – questionable trip generation data and total trips for the school b) Options 2-4: <ul style="list-style-type: none"> a) Lack of modelling data b) Reliance on Traffic Management Order with no assurances c) Loss of on street parking d) Options 2, 3 and 4 do not provide greater assurances than Option 1, originally put forward by the Council c) Lack of returnable Travel Plan Bond d) Matters of clarification - triggers and details of the additional 7% disabled parking bays; request for uplift of cycle storage for the school.
	Energy	Lack of Sustainable Construction Checklist
	Trees	Removal of street trees and need for CAVAT valuation to inform compensation
	Ecology	Need for further surveys and net gain
	Waste Management	<ul style="list-style-type: none"> a) Need for swept path analysis b) Objection to the Circular Economy Statement c) Matters of clarification - Development Area 1: Need for contingency plan, lack of detail on basement plans and bulky waste storage and food waste; insufficient refuse storage facilities in building 4 and need for S106 contribution for secondary collection.
Application B	Transport	Refer to highway comments associated to Application A
	Waste	Insufficient detail
Application C	OBJECTION	Refer to Richmond Council's Planning Committee minutes and revised Heads of Terms.

- 1.3 On 17 November 2020, the Council submitted a further email (Appendix 2) providing greater detail of the concerns regarding the assumptions, methodology and conclusions drawn within the Transport Assessment; Framework Construction

Management Statement and Environmental Statement Addendum and Non-Technical Summary. These can be summarised as:

- a) Inaccuracies within the documents stating Hammersmith Bridge remains open for pedestrians and cyclists.
- b) Assumptions the Bridge will be re-open by the time the development is fully operational.
- c) Failure to take into consideration the effects of the long-planned closure of the Bridge within the TA methodology, thereby raising questions of the accuracy and conclusions reached.
- d) Failure to acknowledge how the closure of Hammersmith Bridge will impact upon traffic distribution (both during construction and operational development); public transport distribution; assessment areas, flow difference and baseline conditions.
- e) Failure to consider the cumulative effects arising from the closure of Hammersmith Bridge upon construction and operational development and the in-combination effects of the Works and Operational Development.
- f) Lack of information on public transport mitigation.
- g) Lack of details / confirmation the public transport mode share predictions would be met or capable of being met.
- h) Concern as to how Travel Plans can be developed, and targets committed to in response to public transport uncertainty.
- i) Lack of information on the VISSIM Microsimulation modelling.

1.4 In November 2020, the Mayor resolved to postpone the Representation Hearing in order to enable further assessment of the proposals. The applicant subsequently submitted the following additional documents for consideration:

1. Technical Note TN039 – Detailing transport impacts resulting the closure of Hammersmith Bridge.
2. Technical Note TN041 – A summary of traffic modelling findings.
3. Highway Mitigation Option Plans.
4. Technical Note TN040 – The applicant’s response to transport issues raised during previous public consultation processes.

1.5 It was also confirmed Application C, which proposed works to the Chalkers Corner Junction, was withdrawn.

1.6 This letter is a response to the revised documents (1-4). Given these documents relate to solely highway considerations, all objections, matters of clarification and planning obligations regarding other material planning considerations, as summarised above and as detailed in the Council’s formal responses submitted in the October and November 2020 (Appendix 1 and 2) remain valid.

Applications A and B

2.0 Technical Note TN039 – Implications of Hammersmith Bridge closure

2.1 As previously identified the Council raised concerns over the submissions failure to consider the effects of the long-planned closure of the Bridge within the TA methodology; the impact the closure will have upon traffic distribution (both during construction and operational development); and the cumulative effects arising from the closure of Hammersmith Bridge upon construction and operational development.

2.2 The document states it has been prepared “to discuss the implications of the Hammersmith Bridge closure on the Stag Development during both the operational and construction phase”.

2.3 The Technical Note considers:

- Implications of Bridge Closure on Local Highway Network
- Implications of Bridge Closure on phased development and when fully operational.
- Implications of Bridge Closure on partial occupation and construction.

2.4 The Council has the following observations:

1. Trip generation: The assumptions made within the Technical Note are based on trip generation figures which the Council has previously questioned, and thereby the Council raises doubts over the robustness and accuracy of the conclusions reached:
 - a. The total revised person trips for the school is only 985 for total arrivals between 8am and 9am, of which 81 would be by vehicle. For a school of 1,260 pupils and 60 staff, 985 arrivals during the peak hour implies an implausibly high level of absence or arrival at another time.
 - b. It is noted 985 trips to the school would not all be one-way as they include parents and other short stay visitors who subsequently depart the school. There are 152 trips leaving the school in the morning peak, including 71 by vehicle and 30 on foot. The net number of arrivals at the school between 8am and 9am would therefore be lower still than 985. The Council thereby requests:
 - The GLA robustly test the trip generation methodology
 - Confirm whether the school proposes staggered start times as an explanation for the low total person trips
2. When considering the impact of the closure on the highway network, the Technical Note utilises data that was collected pre (2017 and 2018) and post (2019) closure of Hammersmith Bridge. However:
 - a. No details of the dates of the surveys have been provided, and therefore the Council cannot ascertain if these are comparable surveys and if they were carried out at appropriate times of year (i.e. outside school holidays).
 - b. The extent of data is very limited, with Chalkers Corner surveys carried out on one day only.
 - c. The data focuses on Chiswick Bridge and Chalkers Corner only and does not consider the impacts of the closure on the wider network, for example, Mortlake High Street, Sheen Lane, Upper Richmond Road West and Upper Richmond Road.

As such, the conclusions reached regarding the impact of the closure on the highway network are of limited use, and therefore cannot be relied upon as a representative base for the wider network.

3. The Technical Note considers the impact of the closure on the Bridge on development traffic distribution. If the Bridge was open, modelling shows only 2-5 vehicles from the development will use the bridge during AM peak and 1 vehicle during PM peak. The Note concludes given the limited impact of the Bridge closure on Chiswick Bridge (3-4% increase in traffic northbound and 5-8% increase southbound) and on Chalkers Corner (1.4% increase during the AM peak and 1.3%

in the PM peak) the redistribution of the Hammersmith Bridge development traffic (1-5 vehicles) is not deemed significant and the conclusions outlined in the TA and ES remain valid. The Council accepts that the pre-existing restrictions on the Bridge coupled with its listed status meant that it was not proposed to provide for construction traffic. Notwithstanding such, the Council are concerned over the robustness of the survey data (point 2), and the Technical Note fails to detail the impact of Bridge closure on bus travel and distribution.

4. The Technical Note identifies the peak construction year as 2023, with 164 two-way vehicular trips over the course of the day; and considers the cumulative impact of such with the development traffic arising from its phased completion. It concludes the phased development trips and peak construction trips will be less than total trips generated by a fully operational development. Whilst this is accepted, the Council remain of the view the impact on the highway network has not been fully considered in response to:
 - a. the limited survey data and extent of assessment area (refer to point 2)
 - b. construction traffic mixing with greater levels of general traffic as a result of more general traffic using Chalkers Corner and Chiswick Bridge due to the closure of Hammersmith Bridge.
 - c. Lack of details of driver delays.

5. Public transport:
 - a. It is significant that the public transport mode share predictions within the TA and travel plan are not presently supported by any firm details demonstrating that they would be met or capable of being met during the closure of the Bridge or indeed, as TfL wished to retain flexibility in future bus service provision, after it reopens.
 - b. Further there is significant concern as to how the Travel Plan can be developed and targets committed to, and discharged by the LPA, with such uncertainty. This has yet to be considered.
 - c. There is no assessment as to how the closure of the Bridge will impact on bus traffic distribution.
 - d. The development is predicated on substantially higher usage of sustainable transport modes than commonly observed in the local area. The Council has reservations as to whether or not the mode share targets are deliverable, notwithstanding that the Bridge closure will make meeting the targets even more difficult by removing convenient bus connectivity with Hammersmith.

6. Re-opening of the bridge: There remain inconsistencies regarding the timeframes for Bridge repairs, compared to those set out by Baroness Vere in the public meeting held in October 2020. Further, there is an over reliance on bridge re-opening, however, no funding package has been agreed.

Table 2: Detailed commentary of Technical Note TN039.

Paragraph	Comments
1.1.2	With the closure of the bridge, it is of significant concern that no up to date assessment (as an alternative scenario) has been undertaken of the effects of both construction traffic (at peak 164 vehicle movements per day) and operational development on Chalkers Corner and surrounding roads. This is deemed essential given the uncertainty over the funding of Hammersmith Bridge repairs, their timings, and the likelihood when this will be open to vehicles.

1.1.8	During the Public Meeting held in October 2020 (29 minutes / 06 seconds into the recording); Baroness Vere confirmed it would be 6 ½ years before the Bridge would be open to vehicles – compared to 5 years and 4 months stated within the Technical Note.
1.1.9	<p>The Technical Note states the development is currently proposed to be fully operational in September 2027 with peak construction currently identified for 2023.</p> <p>Such dates are questioned given these appear to rely on a start date of January 2021 (as identified within July 2020 Framework Construction Management Statement).</p>
1.1.10	<p>There is currently no evidence of funding package, and therefore it is questionable as to whether then Bridge will be open before the development is fully operational in September 2027.</p> <p>The completion date of September 2027 is questioned given the delays within the application process.</p> <p>Refer to earlier comments on inconsistencies with timeframe of Bridge re-opening.</p>
1.1.11	Disagree with claim the Bridge could reopen by when the development is fully operational, given no funding agreement and timescales involved.
1.2.2	There is a lack of detail regarding the data that was collected of the number of vehicles travelling over Chiswick Bridge. To ensure the assessment is robust, the data needs to be collected at comparable times and outside school holiday periods and be representative to a normal day?
1.2.5	As above - when was the data collected?
Table 3.1	The estimated completion dates are questioned. These appear to reflect the completion dates outlined within the July 2020 version of the Framework Construction Management Statement, which were reliant on a start date in January 2021, which has now passed.
1.3.3	The Council has previously raised concerns over the robustness of the data used in the TA, particularly the trip generation for the school.
1.3.7	<p>Baroness Vere estimates 6 ½ years for the bridge to be reopened to vehicles.</p> <p>Lack of consideration has been given to the potential scenario of the Bridge not being re-opened within the stated times. It is a realistic scenario that the development may be fully operational, and the Bridge still closed, and thereby those predicted to arrive from the Hammersmith direction by bus, cycle or vehicle would not be able to do so. These journeys would displace to other roads and the relative</p>

	proportions of journeys by bus, cycle and vehicle would be liable to change.
1.3.8	No consideration or explanation has been given as to how the closure of the Bridge may affect public transport traffic distribution.
1.4.1	It is questionable as to whether the bridge will be re-opened prior to the development being fully operational: <ul style="list-style-type: none"> ○ Over-reliance on the funding package being agreed and Hammersmith Bridge Works starting shortly. A funding package or repair programme has yet to be agreed. ○ The opening date of Hammersmith Bridge is inconsistent with that outlined by Baroness Vere. ○ Completion dates is reliant on a start date in January 2020.
1.6.2	The reliance on the date of the re-opening of the Bridge is questionable, given there is currently no funding agreement, and no contingency has been allowed for in case of potential delays during repairs etc.
1.6.3	Disagree that the majority of the trips will not be on the network by 2027. By end of 2026 – school and 881 units will be occupied: <ul style="list-style-type: none"> ○ By 2024 – school and 284 units ○ By 2023 – another 207 units ○ By 2026 – another 390 units

3.0 Technical Note TN041 – Stag Brewery VISSIM Modelling Summary

Background:

- 3.1 A full TfL VISSIM Model Auditing Process (VMAP) has been undertaken at junctions agreed with TfL to determine the proposed mitigation for Chalkers Corner and to confirm the other highway mitigations along Lower Richmond Road, Mortlake High Street and Sheen Lane are adequate for the development. This included the use of TfL Strategic Models to determine growth factors for future year models and to calculate the distribution of development trips throughout the local networks.
- 3.2 With the exception of Option 1 (LBRuT Mitigation Package), the mitigation options put forward in the July 2020 scheme have been modelled:
- Option 2: Chalkers Corner light (a capacity improvement at Chalkers Corner within the current highway boundary footprint, avoiding land take)
 - Option 3: Lower Richmond Road westbound bus lane approaching Chalkers Corner
 - Option 4: Chalkers Corner light and bus lane (Options 2 and 3 combined)
 - Option 5: Chalkers Corner scheme (application C) (the application requiring land take from Chertsey Court, resolution to refuse by the Council)
- 3.3 It was found that Option 3 would not work on its own, and thereby removed from consideration, and in response to the modelling indicating Option 2 and 4 were both capable of mitigating the needs of the development, Option 5 was withdrawn.

3.4 The Technical Note informs detailed modelling which was undertaken for the existing Chalkers Corner layout and Options 2 and 4 using microsimulation software. Both Options include common wider highway works, many as set out in the original application which were accepted by the Council, including bus, pedestrian, cycle and highway improvement works, as outlined in plans 38262/5514/023E and 38262/5514/021C:

- 20 mph between Williams Lane and Bulls Alley.
- A new signalised crossing provided just to the west of the new access road to the school.
- Relocation of bus stops to key pedestrian desire lines.
- Relocation and widening of existing signalised crossing adjacent to Ship Lane to align better with key pedestrian desire lines.
- Extension of the two lanes on the Lower Richmond Road arm of the Sheen Lane mini-roundabout so as to provide more capacity for those heading from west to east across the roundabout;
- Provision of 'KEEP CLEAR' markings on the Sheen Lane mini-roundabout to free up the roundabout when the level crossing is down.
- Provision of an informal crossing point on the east side of the roundabout enabled by providing a kerb buildout on the corner to slow traffic and improve pedestrian/vehicle inter visibility at this location.
- Provision of a new zebra crossing to serve a desire line to the eastern portion of the development and help to reduce speeds on Mortlake High Street.
- Enlargement of the central reserve and narrowing of traffic lanes on Mortlake High Street to improve the pedestrian environment by slowing vehicle speeds.
- Provision of a new right turn lane on Mortlake High Street to provide for right turners into the development car park at the current junction with Vineyard Path.
- Tightening of radii and footway build-out at Vineyard Path Junction.
- Relocation of bus stops and bus stands on Mortlake High Street to allow for the new access points and the new crossing.

The above measures would be subject to detailed design and secured by appropriate planning and highway agreements.

3.5 In addition to the above, Option 2 includes:

- Provision for a left turn flare lane from Lower Richmond Road.
- Relocation of stop lines on A205 closer to the junction.
- Introduction of advanced stop lanes on Mortlake Road and Clifford Avenue South to raise awareness of cyclists.
- Improved crossing facilities.
- Widening of area between junctions by relocating stop line by 2m

3.6 Option 4 incorporates the same measures as Option 2, with the addition of the westbound bus lane along Lower Richmond Road.

3.7 From the modelling, the Technical Note identifies both Option 2 and 4 show significant improvements to the future base year (2031) plus development scenario in both peak periods for general traffic and can sufficiently alleviate the impact of the development:

- In terms of general traffic and network performance, TfL has confirmed that both options provide adequate general traffic mitigation for the development, and the Options will not significantly impact on general traffic on any routes.

- In terms of bus travel, bus journey times are shown to improve with both options, except route 419 northbound in both peaks. However, the Technical Note acknowledges that due to the agreed bus contribution £3,675,000, additional bus services could be added to route 419 in each direction, which would reduce dwell times further at bus stops along the route.

3.8 The Technical Note concludes Option 4 is the preferred option as this promotes sustainable travel in line with policy T1.

Comments on the Technical Note:

3.9 The Council maintains its concern over the age of the survey data, and therefore question the appropriateness of using the data to inform necessary mitigation measures. This is recognised with the Technical Note 38262 'Implications of Hammersmith Bridge Closure', which states under paragraph 1.1.2, "*There has been no opportunity to gather any further data due to Covid – 19, however new traffic surveys and modelling will be undertaken prior to the implementation of the highway improvements*". Notwithstanding such, the following comments are made with respect to Options 1-5.

3.10 As set out in the NPPF and NPPG, planning obligations (for example, to secure highway mitigation measures) may only constitute a reason for granting planning permission if they meet the following tests:

1. Necessary to make the development acceptable in planning terms;
2. Directly related to the development; and
3. Fairly and reasonably related in scale and kind to the development.

3.11 Option 2: The Technical Note concludes Option 2 'Chalkers Corner light' is sufficient to meet the needs to the development in terms of both general traffic and network performance; and bus journey times. The Council accepts Option 2 meets the tests of planning obligations, whereby it is necessary to mitigate the potential harm to the highway network; the works are directly related to the development and are reasonable. However, it must be noted that Option 2 only mitigates the impact of traffic generated by the development if the predicted trip rates and mode shares are realised, about which the Council has serious doubts.

3.12 Notwithstanding the above:

- The Council does not deem Option 2 is the only potential mitigation Option (refer to comments under Option 1), but could and preferably should be part of a more balanced 360 degree mitigation across the wider network in terms of traffic signal changes, cycle and bus measures and pedestrian improvements, to maximise the chances of the traffic being satisfactorily mitigated and the travel plan successful. It is accepted that the measures identified in 3.4 above go part way to achieving this.
- The Council questions whether the VISSIM models considered the impact of Hammersmith Bridge on the distribution of development trips.

3.13 Option 4: The Council has previously expressed the following concerns regarding this Option:

- London Borough of Richmond is the Local Highway Authority for Lower Richmond Road and thereby this road is outside the ownership and management of the applicant or TfL;
- Loss of on-street parking;

- This scheme would require statutory consultation, and, in the likelihood of local objections, the Council could not guarantee the making of the necessary traffic order. Objections on grounds that the scheme is not essential would be difficult to dispute given the information circulated;
- The benefits the bus lane will deliver are questionable in response to the limited routes that serve Lower Richmond Road and the bus lane only assists westbound bus traffic from the site towards the Chalkers Corner. It would provide little benefit in accessing the site during the morning peak, whilst the afternoon school peak does not coincide with the general afternoon peak
- The Technical Note confirms that given the uncertainties of Hammersmith Bridge the preferred bus strategy to meet the needs of the development cannot be drawn up. It is therefore premature to give weight to the benefits of a bus lane along Lower Richmond Road.
- Option 2 would not satisfactorily mitigate the impact of the development if the predicted trip rates and mode splits are not achieved, and it is considered that the addition of Option 4 would neither.

3.14 Whilst Option 4 may be the applicant's preferred Option, this is not supported by the Council for the above reasons, nor does the Council consider this Option meets the tests set out in the NPPF.

3.15 Option 4 is the same as Option 2 with the addition of a westbound bus lane along Lower Richmond Road. The Technical Note, by its own admission confirms Option 2, with a bus service contribution, is sufficient to mitigate the impacts of the development. As such, the bus lane is not a necessary mitigation measure to make an unacceptable development acceptable, and thereby is deemed potentially challengeable.

3.16 The Council does not accept the London Plan (policy T1) target of '80% of all trips made by foot, cycle or public transport by 2041', is solely reliant on Option 4. The Technical Note confirms a bus service contribution of £3,675,000 will be secured as part of the mitigation measures package, which in line with policy T1 will help ensure any impacts on the London bus network are mitigated and will also facilitate sustainable travel. This is also in addition to the measures proposed in paragraph 3.4.

3.17 Option 1: This Option incorporated a package of measures to mitigate the highway impacts of the development (which were in addition to the highway works outlined in drawing 38262/5501/058 H; the bus service contribution, CPZ consultation and implementation and phased opening of the school) and included:

1. Area wide traffic management contribution £1,953,000 towards measures in the local area, such as:
 - Measures to support safe and convenient access by foot, bicycle and bus (this may include a feasibility study and consideration of improvements to the pedestrian footbridge that links Kingsway with St Leonards Road / The Byeway.
 - Traffic signal and junction improvements
 - Improvements to access to Mortlake Station and Barnes Bridge Station
 - Signage and wayfinding
 - Bus stop infrastructure and public transport information
 - Environmental improvement and greening
 - Cycle parking
 - Traffic enforcement, including camera deployment
2. Highway Improvements Contribution of £950,000 towards improvements along Lower Richmond Road, Mortlake High Street and Sheen Lane.

3. Chalkers Corner Junction Contribution: £1,650,000 towards junction, highway and traffic signal improvements

4. Travel Plan contributions including:
- i. Travel plan monitoring - £30,000
 - ii. Travel Plan implementation bond - £250,000
 - iii. Travel plan target bond for 7/8 years - £250,000

3.18 The Council acknowledges (as set out within the original Transport Assessment), Chalkers Corner, the Upper Richmond Road & Sheen Lane junction; and the Sheen Lane & Mortlake High Street and Lower Richmond Road roundabout already or will operate over capacity. As outlined in paragraph 3.12, it is the Council's opinion that greater reassurance would be provided if a wider mitigation strategy were developed (Option 1) that:

- Gathers up to date surveys and modelling of the highway network, taking into account the closure of Hammersmith Bridge; gather an understanding how COVID -19 has altered travel patterns; and to get clarification of extent to which ULEZ impacts on modelling, given ULEZ requires signal changes at Chalkers Corner
- Understands the pressures on the highway network, not just at Chalkers Corner and the immediate vicinity of the development, but in the wider area
- Identifies potential highway infrastructure changes / investment to improve the current baseline condition, capacity and mitigate the development
- Understands the benefits and impacts of such changes and investments

3.19 Whilst Option 1 has not been modelled, this should not be a reason for it to be discounted. The benefit of Option 1, and the reason why the Council proposed it should be secured as part of the S106, is its flexibility. As part of Option 1, the Council would undertake such feasibility work to ensure any highway works are targeted at improving the capacity of the wider highway network and mitigating the highway implications of the development, funded by the contributions secured through this Option.

3.20 An element of Option 1 is a 'returnable travel plan bond'. The Council disagrees with the applicants' opposition to such. The scheme depends upon ambitious sustainable travel mode shares and low car trip rates. In the absence of any increase in proposed contributions towards rail or bus, success of the travel plan measures becomes more critical still. The Council would seek to ensure that adequate resources are provided to monitor and enforce the travel plans and deliver transport and highway schemes if the travel plans do not meet their targets or obligations. It is noted that the residential travel plan has very ambitious targets for 12% car mode share, 10% cycling and 34% walking, compared with targets of 31%, 4% and 28% in the January scheme. There is no justification provided as to why a returnable travel plan bond is not accepted; it is unclear what the mechanism would be for ensuring remedies are delivered if the travel plan fails to meet its targets and objectives.

3.21 Option 5: The Council welcomes the withdrawal of Option 5 (Application C)

4.0 **Wider highway works as outlined in plans 38262/5514/023E (Option 4) and 38262/5514/021C (Option 2)**

- 4.1 The wider highways works along Lower Richmond Road, Sheen Lane and Mortlake High Street (as set out in drawings 38262/5514/023E (Option 4) and 38262/5514/021C (Option 2)) are broadly the same as previously agreed and secured by the Council in January 2020, with the following amendments:
1. Zebra crossing by school – replaced with pedestrianised signal-controlled crossing with raised surface (Option 2 and 4)
 2. Zebra crossing outside no. 3-4 Lower Richmond Road replaced with signalised crossing (Option 4)
 3. Proposed flat hump at entrance to Williams Lane (option 4)
 4. New path leading from the centre of Mortlake Green to the gateway of the development increased in width from 4m to 6m.
 5. Retention of the existing path within Mortlake Green, that extends to northeast corner of the park.
- 4.2 Whilst no objection is made to the new pedestrianised signal crossings, the Council formally objects to the further alterations to Mortlake Green. Mortlake Green is designated Other Open Land of Townscape Importance, Public Open Space, forms part of Mortlake Green Conservation Area and is an asset of the London Borough of Richmond.
- 4.3 No objection was previously raised to a new 4m wide path through Mortlake Green to the development site, acknowledging the accessibility and permeability benefits this would deliver. However, this was subject to S106 financial contributions and the removal of an existing path that leads to the northeast corner of the site (which will be out of the desired sight lines). The revised plans now propose an increase in the width to the path (to 6m) that leads to the entrance or 'green link' of the development and the retention of the existing northeast pathway.
- 4.4 The Council's Parks Team has previously advised Mortlake Green is already at capacity. Without justification for the increased width of the path, the Council objects to the further encroachment of built form/hardstanding into the park, which will only place additional pressure on the remaining soft landscaping areas, especially with the retention of the existing northeast path. Most pavements are commonly about 2 metres wide. The Council thereby questions why a footpath of greater than 4m is required. It is deemed the original 4m width should be sufficient to deal with the numbers of pedestrians and cyclists using the crossing for the majority of the time - assuming a conservative capacity of 3 people per minute per metre width (taken from DfT LTN 1/12), the 4m path would cope with 720 people per hour and likely considerably more.
- 4.5 If the increased width of the path is found necessary (in consultation and agreement with the Council), the following comments are made:
- i. The increased width makes a larger gap in the northern vegetation barrier which will need to be offset through further planting and possibly slightly curving the new path so that the southern end meets the existing network slightly to the east.
 - ii. If the flows are significant, the Council may need to widen the main path route through the park to the town centre and station to greater than the 2m currently costed into the s106. Therefore, contributions need to be revisited.
 - iii. Any new path should be permeable to offset loss of green space.
- 4.6 Such amendments as set out in drawings 38262/5514/023E and 38262/5514/021C also appear inconsistent to other documents within the submission, namely, the Landscape Design and Access Statement and Arboricultural Impact Assessment,

which both indicate a 4m path, and the removal of the northeast pathway. Clarification is thereby sought regarding the proposed amendments to Mortlake Green whilst noting that securing these amendments is not within the applicants control or the planning authority.

5.0 **Technical Note TN040 (Final) – Consultation Response**

5.1 The Technical Note was prepared to provide clarification to issues raised during the public consultation period, by residents and statutory consultees. The Council wishes to make the following comments:

Car parking:

5.2 For purpose of clarity:

- a) The Council raises no objection to the reduction of the car parking provision on site, subject to Heads of Terms to ensure no unacceptable impact on the highway network, including a CPZ contribution, reprovision of parking, Travel Plan, and car clubs etc.
- b) The Technical Note states the “*original scheme that was consented in January 2020*” (para. 1.2.1). No application has been approved by the London Borough of Richmond. In January 2020 the Planning Committee resolved to approve the application, subject to no adverse direction or call in by the Mayor of London.

5.3 Requests for further clarification:

- a) What are the arrangements for the allocation of car parking spaces?
- b) What are the triggers for general car parking spaces to be converted to ‘disabled spaces’ and how does this fit in with the leasing / selling of car parking spaces?
- c) The Technical Note refers to the EVC infrastructure within Ship Lane and 20% active facilities elsewhere. Previously the Council secured EVC infrastructure to the replacement parking along Williams Lane. Is such provision still incorporated within the scheme?
- d) The Council assumes that a car parking management plan would be secured by condition or obligation as a means of ensuring the proper allocation and management of parking supply?

Highway Mitigation – Chalkers Corner

5.4 Refer to section 3.0.

5.5 Requests for further clarification: The Technical Note states “*the existing Chalkers Corner layout with no mitigation, would not be acceptable to TfL due to the impact of the development along Lower Richmond Road on general traffic bus journey times and pedestrians and cyclists*”. What is the threshold for ‘unacceptable impact’?

Parking Stress Survey:

5.6 Parking stress surveys have been undertaken in the vicinity of the proposed bus lane to understand the impacts of the loss of the 36 parking spaces on Lower Richmond Road as a result of the provision of a 24 hour 7 days per week westbound bus lane.

5.7 The surveys were undertaken on Thursday 3rd and Saturday 5th December, both between 10am – midday and 1am and 4am to take a snapshot of parking stress on both days, as agreed with TfL. The Council is disappointed their suggested survey times were not followed.

- 5.8 It is noted the 'Total Spaces Available' column has not been calculated correctly. The total should amount to 452 spaces, rather than 492. However, this appears to be a typing error and does not alter the parking stress. Notwithstanding such:
- a) Concerns are raised with regards to the size of the parking survey area with this being overly large, thereby underestimating the impact of the loss of the on-street parking bays. It is suggested the parking area is restricted to 200m.
 - b) The survey does not appear to consider River Thames tides, which can remove available parking areas along Thames Bank and Ship Lane.
 - c) Under any circumstances, it is considered highly unlikely residents will accept a significant loss of parking amenity outside their homes where they have parked for very many years.
- 5.9 Requests for further clarification: In addition to the loss of parking on Lower Richmond Road as a result of the provision of a westbound bus lane, do Options 2 or 4 result in any loss of parking on the southside of Chalkers Corner (within the parking area)?

Other highway Improvements

- 5.10 The wider highway works along Mortlake High Street, Lower Richmond Road and Chalkers Corner (Option 2), result in improvements on the Healthy Street indicators, which is welcomed. Whilst Option 1 has not been assessed against the Healthy Street Assessment, given Option 1 only sets out the parameters of mitigation measures at this stage, the Council is committed to undertake a Healthy Street Assessment for detailed schemes arising from Option 1 if adopted. The very purpose of Option 1 is to ensure that mitigation measures support the Healthy Streets agenda and encourage active travel, including walking and cycling.

Towpath Improvements:

- 5.11 Previously the Council secured a number of works to the towpath, including (but not limited to):
- repairing the existing footpath surface using self-binding gravel (to ensure conformity with the Equalities Act).
 - retain and integrate granite setts on the footpath, public draw dock and slipway
 - developing a paved area on wharf to express existing railway tracks within new pavement design to seating area / wharf upgrade
 - £44,265 towards improvements to the towpath environment to Kew Pier.
- 5.12 The Technical Note states *"It was also concluded through consultation with LBRuT and Towpath Group that no re-surfacing should be undertaken for the Towpath.... Instead the developer has agreed to a contribution to LBRuT for improvements to be made to the towpath"*.
- 5.13 The Council has not agreed to any changes to the original heads of terms and would object to such change.

Cycle Infrastructure / Parking:

- 5.14 Whilst the cycle parking provision is in line with London Plan, the Council requested increased cycle storage provision at the school to encourage sustainable travel, and in addition the ability to secure further storage provision if the Travel Plan indicated such demand. It is disappointing such measures have not been secured.

Servicing:

- 5.15 The Council considers that a waste vehicle would be able to navigate the site but would support a waste management plan condition setting out in more detail how waste would be managed considering the following previously identified concerns:
1. Residential waste collection: Contingency plan; lack of detail on basement plans and regarding bulky waste storage and food waste; insufficient refuse storage facilities in building 4;
 2. Lack of Heads of Term to secure financial contribution towards secondary collection.
 3. Lack of details of capacity within Development Area 2 to meet the needs of development.
 4. Circular Economy Statement:
 - A twice weekly collection and lack of details for commercial waste - adverse impact for environmental performance
 - The Council is unable to 'liaise' with the Facilities Management Team. The collection process is based on the need for efficient collection vehicle routing; times are not provided and just fixed to specified day(s) after 6am.
 - Conditions will be necessary to ensure refuse and recycling bins are located within the collection areas on the specified days.
 - Monies in perpetuity are necessary for the second delivery within Development Area 1.
 - Lack of confirmation there is adequate space for all refuse and recycling bins plus bulky waste
 - Additional bins required for each basement store to enable occupants to continue to deposit waste in them on collection days

Public Transport Improvements - Buses:

- 5.16 The Technical Note acknowledges the uncertainties of the timescales for the Hammersmith Bridge repairs prevents TfL be able to detail the preferred strategy to meet the future requirements of the development. And states, "*once the opening year of the bridge is known, which will be prior to the actual reopening of Hammersmith Bridge, they will undertake an extensive review of bus services throughout the Hammersmith and Richmond area*". Notwithstanding such, the Technical Note fails to:
- Detail how the closure of Hammersmith Bridge has impacted bus routes, passenger numbers and delays?
 - Detail what the impact would be on public transport if there is partial implementation prior to Hammersmith Bridge re-opening.
 - Confirm whether the predicted modes of travel by bus and bus travel plan targets are able to be met
- 5.17 TfL's Busto data from 2019/20 indicates that buses within the vicinity of the site are currently carrying over 2,200 passengers each weekday. The introduction of the Stag Brewery scheme will increase the number of daily bus passengers by 3,786 per weekday. As such £3,675,000 will be secured towards providing an uplift in bus services. However, this is the same contribution as previously secured in January 2020, which was for a smaller scheme. The Council questions whether such a contribution is sufficient given the 54% increase in the number of residential units now proposed.

Implications of the closure of Hammersmith Bridge:

- 5.18 The Technical Note concludes, *“the implications of the bridge closure is considered to be no significant change to that presented in the TA and ES documents”*. It is deemed such a statement is premature in response to the points raised in within Section 2.0 of this letter.

Use of Thames for Construction Waste / Materials & Passenger Transport:

- 5.19 The Council welcomes further investigation to the use of the River as a means of transporting material to and from the site. However, in response to the closure of the Bridge questions whether this is still feasible.

6.0 Summary

- 6.1 In summary, whilst the Council welcomes the withdrawal of Application C and supports the retention of Option 1 as a highway mitigation measure, the Council has the following objections and observations to the details contained within the Technical Notes:

1. Trip generation figures and the consequential robustness and accuracy of the conclusions reached.
2. Surveys – lack of detail, limited data and survey area, and the appropriateness of relying upon these as a representative base for the wider network.
3. Hammersmith Bridge:
 - a. Robustness of the survey data
 - b. Failure to detail the impact of Bridge closure on bus travel and distribution.
 - c. Inconsistencies regarding timeframes for Bridge repairs.
 - d. Over reliance on Bridge re-opening.
4. The impact on the highway network has not been fully considered in response to:
 - a. the limited survey data and extent of assessment area.
 - b. Lack of details of driver delays.
5. Public transport:
 - a. Outstanding questions whether the public transport mode share predictions and travel plan are capable of being met.
 - b. Lack of consideration of the closure of Hammersmith Bridge on bus routes, bus traffic distribution, passenger numbers and delays, and if the financial contribution is sufficient given the uplift in residential units.
6. Mitigation Options:
 - a. Age of the survey data and appropriateness of using such to inform mitigation measures.
 - b. Option 2 – whilst found to meet the needs of the development, this is questioned given the doubts raised over the predicted trip rates and mode shares.
 - c. Option 4 – In addition to the observations made regarding Option 2, this Option is not deemed to meet the planning obligations test set out in the NPPF, results in loss of on street parking; the bus travel benefits are questioned; and the scheme is reliant on Traffic Orders Amendments which cannot be guaranteed.

7. Returnable Travel Plan Bond - The Council disagrees with the applicants' opposition to such.
8. Mortlake Green – Increase in width of the park to 6m and retention of redundant pathway resulting in loss of green space.
9. Car parking – Outstanding questions of car parking allocation, management and EVC infrastructure.
10. Parking Stress Survey: Concerns over survey methodology and area, and therefore the accuracy and robustness of the results.
11. Towpath: Object to changes to previously agreed heads of terms.
12. Cycle parking: Disappointed with lack of additional provision for school.
13. Services: Outstanding concerns over capacity, storage and collections.

Should you have any questions regarding anything raised in this letter, do not hesitate to contact Lucy Thatcher via telephone (020 8 891 7691) or email (Lucy.Thatcher@richmondandwandsworth.gov.uk)

Yours Sincerely,



Jenifer Jackson
Assistant Director of Environment & Community Services (Planning and Transport)

Enclosed.

Appendix 1: Letter dated 29 October 2020

Appendix 2: Email dated 17 November 2020