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By email.

Dear Lucy,

**Twickenham Riverside  
 Response to Additional Comments – Highways and Transport Response**

This letter seeks to provide a response to additional transport and highways queries received from officers via email dated 23 and 24 March 2022. This email seeks clarification on all matters raised. These responses should be reviewed prior to the technical workshop session scheduled for Monday 25 April 2022.

Officer Comments	Applicant Response
<b>Transport and Highways</b>	
<p>The submission states the Oak Tree at the top / northern end of Water Lane is to remain, however, it is very likely that, if the western arm of the bell-mouth is widened, the branches of the tree will be struck by the near sides of HGVs as they turn left from Water Lane on to King Street. It is officers view that it seems difficult for this tree to survive. The submission states, “<i>further assessment of the junction geometry is being undertaken as part of Stage 4 works and the impact on the tree is being further reviewed with regards to the assessment of arboricultural impact and extent of root protection zone</i>”. Delaying this detail until Stage 4 is not appropriate and it is recommended this is addressed prior to any decision. Such details should also cover, impact, CAVAT and mitigation etc.</p>	<p>The proposed Water Lane junction arrangement has been reviewed through a range of swept-path analysis tracking to simulate likely vehicle manoeuvres (WSP drawing series SK-35), and the swept-paths are considered to be feasible. The swept-paths include paths for a refuse truck, 7.5 tonne box van and 12m rigid truck.</p> <p>With regards to the Water Lane junction with King Street, and Water Lane, traffic volumes using Water Lane in the future will be very low when compared with existing levels of traffic due to the removal of a significant amount of car parking from the Embankment as part of the masterplan proposals. This means the likelihood and opportunity for vehicle conflicts is considered to be minimal. The signalised junction between King Street and London Road immediately east of Water Lane combined with the road geometry and alignment, also encourages low speeds in westbound traffic along King Street on the approach to the Water Lane junction, which again lend itself to the two-way movement being introduced on Water Lane.</p>
<p>Whilst a restriction can be placed on the bollards on The Embankment to be only open to HGV vehicles between 7am – 10am, there is a remaining concern of the following statement within documentation (LBRUT Transport Comments Review – WSP</p>	<p>The procedure for allowing vehicles across the Embankment at times outside of the servicing hours is only intended for emergency situations when a delivery by a heavy goods vehicle for Eel Pie Island has occurred out of usual hours, and that vehicle</p>



<p>Response), <i>‘There will be a booking procedure in place whereby occasional requirements for larger vehicles out of hours (e.g. articulated lorries occasionally generated by Eel Pie Island) to facilitate access along the Embankment in liaison with the Council where there is reasonable need’.</i></p> <ul style="list-style-type: none"> <li>• There is real concern over this statement’s ‘vagueness’ – how does the applicant deem the Council will enforce the occupants of business premises on Eel Pie Island to abide to the proposed booking process if their business premises are not part of the planning application?</li> <li>• What does the applicant deem as a reasonable need?</li> <li>• Who is going to manage this booking procedure?</li> <li>• If the Council is to administer such, who would pay for such?</li> </ul> <p>How many vehicles are likely to require such access outside the designated times? (this all diminishes the quality of the riverside and the aspiration of this area to be car free).</p>	<p>cannot turn and go back up Water Lane. The Council will expect EPI to use the servicing hours set but the booking procedure gives the Council flexibility should an unexpected delivery arrive.</p> <p>Given that the total amount of HGV movements across the Embankment associated with Eel Pie Island is understood to be up to 4 or 5 times per year, we expect that this situation will only arise a few times per year if required at all. Conversations have been had with the Highway Authority who, alongside the Facilities Management team, will manage the space in conjunction with how Church Street closure is currently managed. Ongoing costs will be met from within the appropriate council budgets.</p> <p>Facilities Management personnel at the Council will take ownership of booking procedures and bollard management, in cohesion with local businesses including those on Eel Pie Island. Extensive consultation has taken place with the Eel Pie Island Association to ensure the businesses can function as they currently do, and the booking procedure is considered to be a formalising process and within the interests of the EPIA.</p>
<p>The scheme is contrary to the London Plan in terms of disabled parking provision for residents. Whilst officers are aware of the site’s town centre location and car free approach –</p> <ul style="list-style-type: none"> <li>• what discussions have been had with the RP on this matter?</li> <li>• What is the RPs view over the lack of parking for the wheelchair housing?</li> <li>• Is there demand for affordable wheelchair accommodation without disabled parking provision on site?</li> <li>• How will the RP rent out such accommodation without any such parking?</li> </ul> <p>In addition to officers wishing to know such, such questions are likely to be asked by the Planning Committee when considering the value of the proposed affordable housing</p>	<p>Further information has been provided from the Council further to developments and discussions around accessible units and through previous correspondence with the Registered Provider. In summary:</p> <ul style="list-style-type: none"> <li>• The RP have made a firm offer for the homes based on the current design of the scheme, including the provision made for car parking. They are therefore content to take on the homes based on the current provision made for parking.</li> <li>• When assessing schemes that are required to be car free generally, the Council want the schemes to be equitable – i.e. they do not want wheelchair accessible homes excluded from a scheme purely because of parking limitations</li> <li>• In turn the Council would like to give residents on the waiting list who require wheelchair accessible homes the opportunity to live in high quality affordable</li> </ul>

developments such as Twickenham Riverside.

- The Council will have exclusive nomination rights to the rented homes (including the w/c accessible homes). The council's Allocations Team will make potential residents aware of the situation with car parking, so they have a clear choice around accepting a home. In this case there may be access to a space if they have a car, or, given the highly accessible location of the site close to shops and services, a resident may feel they do not need a car or a parking space. It is not necessarily the case the wheelchair users have or require a parking space to occupy a wheelchair user dwelling and this would be taken into account when homes are allocated.
- The Council do not expect this to affect demand for such homes, and are confident the Allocations Team will be able to nominate residents in need to the appropriate homes given this is a high quality development in a central location.

Regarding design, the proposed development is compliant in terms of accessible bays from the point of operation, providing around 6-7% (3 bays for 45 residential units total), which is greater than the minimum provision which suggests 3% from the offset with capacity for a future level of 10% when fully operational and subject to future demand. Therefore there would be a need to allow for the potential for up to 5 accessible bays on site.

Whilst these have not been indicated on the General Arrangement scheme drawings (given there is no requirement nor need to implement these bays from the point of first operation), the location for two additional bays has been considered through Stage 3 and Stage 4 design optioneering. The two bays would be located along Water Lane, south of the service road and Motorcycle Bay, as shown in Appendix 1. The location of the 2 additional accessible bays are considered suitable for the following key reasons:

- In proximity of both the garden and masterplan area, commercial and residential blocks.

	<ul style="list-style-type: none"> <li>• They are in the location of existing parking bays to the southern end of Water Lane, and therefore do not represent a significant change.</li> <li>• Vehicle swept-path and tracking has been undertaken to illustrate feasibility of manoeuvre along Water Lane to ensure two-way access (including HGV access) can be maintained between the embankment and King Street along Water Lane.</li> </ul>
<p>On Wharf Lane:</p> <ul style="list-style-type: none"> <li>• there remains concern over visibility, particularly of pedestrians travelling along the southern footway along King Street.</li> <li>• Concerns have also been raised regarding the large vehicles turning left out of the junction and needing to get into the nearside lane to travel along Cross Deep encroaching on cyclist and vehicular traffic in the central cycle lane and the outside lane.</li> <li>• Whilst the matter has been discussed in the Road Safety Audits, it is recommended this is addressed now, as when you come to submit a junction design as part of the S278 process, to ensure this is feasible.</li> </ul>	<p>Both points have been responded to thoroughly through the RSA Stage 1 response. With the lower traffic volumes than the existing site, slow speeds on the approach and signalised junction immediately west of Wharf Lane along King Street all mechanisms to facilitate and encourage safe operation of the junction. It is also worth noting that the junction proposals maintains the same level of safety as the current position. We note the recommendation regarding the s278 process.</p>
<p>Wharf Lane:</p> <ol style="list-style-type: none"> <li>a. The submission states that service operatives needing to service Iceland will be able to use a loading bay on the western side of Wharf Lane south of its junction with King Street. However, the plans do not detail where this will be. Whilst this can be decided via the TMO process, the location of this will need to be carefully considered because the carriageway is only 5.1m wide west of the shuttered access to the rear of Iceland. Manual for Streets guidance states that a carriageway width of 5.5m is needed for two HGVs to pass each other safely. It</li> </ol>	<p>The location and has been discussed through correspondence with Highways and Parking officers at the Council in March 2022 following review of these additional comments. No formalised loading bay is to be provided as the frequency of delivery and use of this area for deliveries is considered to be an early morning operation only associated with the existing Iceland store. HGV parking along here will be undertaken in accordance with the same HGV limits and hours of restriction proposed along the Embankment.</p> <p>It should be emphasised that the frequency of this movement will be very low, in reality one vehicle each day in the early morning associated with Iceland, as is the current strategy. This is considered to represent a clear improvement against existing procedures, whereby there have</p>

<p>is therefore recommended that a plan is provided detailing the location at this point so officers can investigate whether this is actually feasible and safe and ensure it meets Iceland's requirements.</p>	<p>been noted instances of vehicles reversing down Wharf Lane.</p> <p>Signage and the two-way movement strategy will ensure that no vehicles larger than a 7.5t box van travel southbound along Wharf Lane in future. To demonstrate feasibility of manoeuvrability, the swept-path of the largest vehicle travelling southbound along Wharf Lane (a 7.5t box van) whilst an articulated lorry is parked, a swept-path illustration is provided at Appendix 2.</p>
<p>Wharf Lane:</p> <p>b. There will be a vehicular weight restriction on Wharf Lane from the point where it meets the service road to the east and to the point of its priority bell-mouth junction with King Street. Because of this, refuse vehicles needing to service the western building will need to stop in the inset layby on the eastern side of Wharf Lane south of its junction with the service road and will then need to use the junction to turn around and drive southwards towards the Embankment at a time when the barriers are down. Please submit a vehicular tracking drawing to show that a refuse vehicle of 10.4m long and 2.5m wide can do this safely</p>	<p>We clarify that the proposed restriction along Wharf Lane is in relation to southbound traffic from King Street only. Refuse vehicles will not be required to undertake a turning manoeuvre to travel south and will instead egress the masterplan by proceeding northwards to re-join King Street from Wharf Lane</p>
<p>Service Road</p> <p>a. Existing pedestrians will suffer the loss of footway on the northern side of the road, which is particularly concerning given residents live in flats above commercial premises on King Street and have rear accesses. The road will effectively become a shared space area of 5m wide. This is 1m below the standard recommended width for shared space roads, with pedestrians and cyclists sharing the road with service vehicles travelling to and from the eastern building. It is recommended that you consider installing a 1.5m wide footway on the southern side of the road east</p>	<p>The proposals do not involve removal of the footway along the service road – please see drawing 6975_100 prepared by LDA. We consider any suggestion to extend the footway on the south side would ultimately increase risk and shorten the footway to the northern side. Any suggestion to extend the footway on the south side would ultimately increase risk and for the avoidance of doubt, we do not propose any amendments to the existing footway on the northern side of the service road.</p>

<p>of the proposed inset disabled parking bay to minimise the risk of pedestrians and cyclists colliding with large vehicles along the service road.</p>	
<p>Service road:</p> <p>b. Regarding the new widened bell-mouth junction with Wharf Lane, it appears that it is necessary to take private land owned by a third party to widen the bell-mouth on the northern side of the road. Please demonstrate you have the legal means to do this (see Appendix 3). It is difficult to say definitively whether this is needed because the red line location on the general arrangement drawing appears different from the one below, which is taken from the drawing that tracks a refuse vehicle into and along the service road (see Appendix 4).</p>	<p>The correct procedure including the boundary is illustrated in Appendix 5, demonstrating that a Refuse Truck can undertake the entry and exit movements with the junction alignment amended to reflect the site boundary requirements. The boundary illustrated on the general arrangement plan is incorrect and, appendix 5 shows the correct boundary which does not require any private land owned by a third party is required regarding the new widened bell-mouth junction.</p>
<p>Water Lane</p> <p>a. There is concern over the pinch point between passing traffic and the width of the loading bay – it is recommended the loading bay should be reduced to 2.5m in width to allow a passing space of 2.9m wide or consider relocating the bay further south where the carriageway is wider.</p>	<p>A key reason for implementing another Loading Bay to the north of Water Lane is to help better serve Church Street. To be effective and reduce trundle distance for servicing operatives, it is suggested this location as far north as possible and is retained to serve Church Street effectively.</p> <p>The recommendations on measurements are noted, and we can confirm that the loading bay can be reduced to 2.5m in width to facilitate a passing space of 2.9m.</p>
<p>Water Lane:</p> <p>b. Questions are raised over the appropriateness of disabled parking bay on the eastern side of the carriageway. Water Lane is on a gradient which means a wheelchair user would have to climb a slope. There is no point in proposing a disabled bay that is difficult for disabled motorists to use</p>	<p>Accessible bay locations are ultimately constrained by the site layout. The southern and northern ends of Water Lane, which are currently locations for existing parking, are deemed to be the most appropriate area to locate accessible bay provision within the masterplan layout.</p> <p>Other locations within the site have been reviewed and considered, but are deemed inappropriate for the following reasons:</p> <ul style="list-style-type: none"> <li>• The Embankment is car free, within the flood zone and represents the lowest point of the site in terms of level gradient</li> </ul>

	<ul style="list-style-type: none"> <li>• The service road is not wide enough to accommodate additional vehicle parking, one accessible bay is already provided here.</li> <li>• Wharf Lane (south end) would not provide an improved gradient for parking bays or for additional parallel parking bay implementation and commercial servicing bay in this location</li> <li>• Wharf Lane (north end) is Double Yellow Line and will not be used for car parking throughout the day, ensuring articulated vehicle parking in proximity to Iceland in the morning and two-way vehicle access throughout the day</li> <li>• Water Lane (north end) has been prioritised for an additional communal loading bay facility with Church Street further to previous design requests, so potential locations for parking here must be further south along Water Lane</li> </ul>
<p>Water Lane:</p> <p>c. There are inconsistencies between the Highways General Arrangement Drawing and the surfacing and materials plan. The Highways General Arrangement Plan shows a footway width of 1.4m immediately east of the on-carriageway loading bay proposed on the eastern side of Water Lane south of its junction with King Street. The Surfacing and Materials Plan shows almost no footway at this location.</p> <ul style="list-style-type: none"> <li>➤ In the commentary on the Surfacing and Materials Plan it states the scheme will provide a generous pedestrians space along Water Lane - There needs to be a minimum footway width of 1.2m at this point to comply with national highway design guidance set out in Manual for Streets (2007).</li> </ul>	<p>Please see drawing 6975_100 prepared by LDA. This shows that the proposed footway width is clear of approximately 1.6m, wider than the 1.2m minimum width.</p>
<p>The Embankment</p> <p>(a) The new line between the two sets of tactile paving could result in blind and partially sighted pedestrians being guided into the privately maintained public realm area up a ramp. It is not clear from the surface and materials plan provided what gradient of this ramp is. Please confirm this is no</p>	<p>Please see drawing 6975_100 prepared by LDA. The proposed gradient slope is 1:20/1:21.</p>

<p>greater than 1:20. Further large scale detail is required prior to committee.</p>	
<p>The Embankment          (b) Drawing No. 70059704-TP-SK-71 is not consistent with the proposed surfacing and materials plan. The surfacing and materials plan shows 11 Sheffield cycle stands north of the planter, however, Drawing No. 70059704-TP-SK-71 does not show these stands. All plans must be consistent and clear, otherwise we are unclear as to what exactly is being asked to approved / accept.</p> <ul style="list-style-type: none"> <li>➤ The shared space area narrows to approximately 5m at this point because of the stands being there. National Design Guidance on shared space areas states that a shared space width of 6m should be achieved in instances where two-way vehicular traffic is allowed in the shared space area. Therefore, will the cycle parking in this location prohibit the effective shared space – is there a more appropriate location for the cycling provision?</li> </ul>	<p>Please see drawing 6975_100 prepared by LDA. This illustrates the 11 cycle parking spaces and this is the correct quantum. Notwithstanding, the highways drawing does not show the full detail that is included in the public realm drawing as these drawings both have different purposes for illustration. However, we can confirm based on the vehicle tracking along the Embankment that the narrowest point for the bicycle wheels offset (4.6m) is acceptable for the one-way east-west movement along here given the widths of any HGV's are 2.5m (fire truck and refuse truck) and 2.55m (articulated lorry).</p>
<p>The Embankment:          (c) Single yellow lines are proposed on the northern side of the shared space area south of the granite kerb and east of the eastern barriers. This needs to be changed to double-yellow lines to prevent motorists parking at this location and impeding access for other road users and increasing the number of car trips to and from the Embankment. To be clear the Council will be insisting on double yellow lines along both sides of the Embankment. This will be secured as part of the TMP within the S278 Works.</p>	<p>The Embankment will be car free and will be prohibited to vehicle traffic throughout the day, as outlined through the implementation of bollards and associated management. When the Embankment is in use as an event or market space and for occasional servicing and maintenance purposes, it will be important to retain flexibility to ensure vehicles can park here to service the masterplan area accordingly. Similarly, the design approach suggests this flexibility should be extended to servicing immediately east of the eastern barrier, given servicing for the EPIA and for the Embankment. As such, SYL markings are considered appropriate in this location and should be retained. Further discussions on traffic management / enforcement are welcomed and will continue to be discussed with facilities and parking management at the LBRUT.</p>

Should you have any queries regarding the above please do not hesitate to contact me.

Yours sincerely,

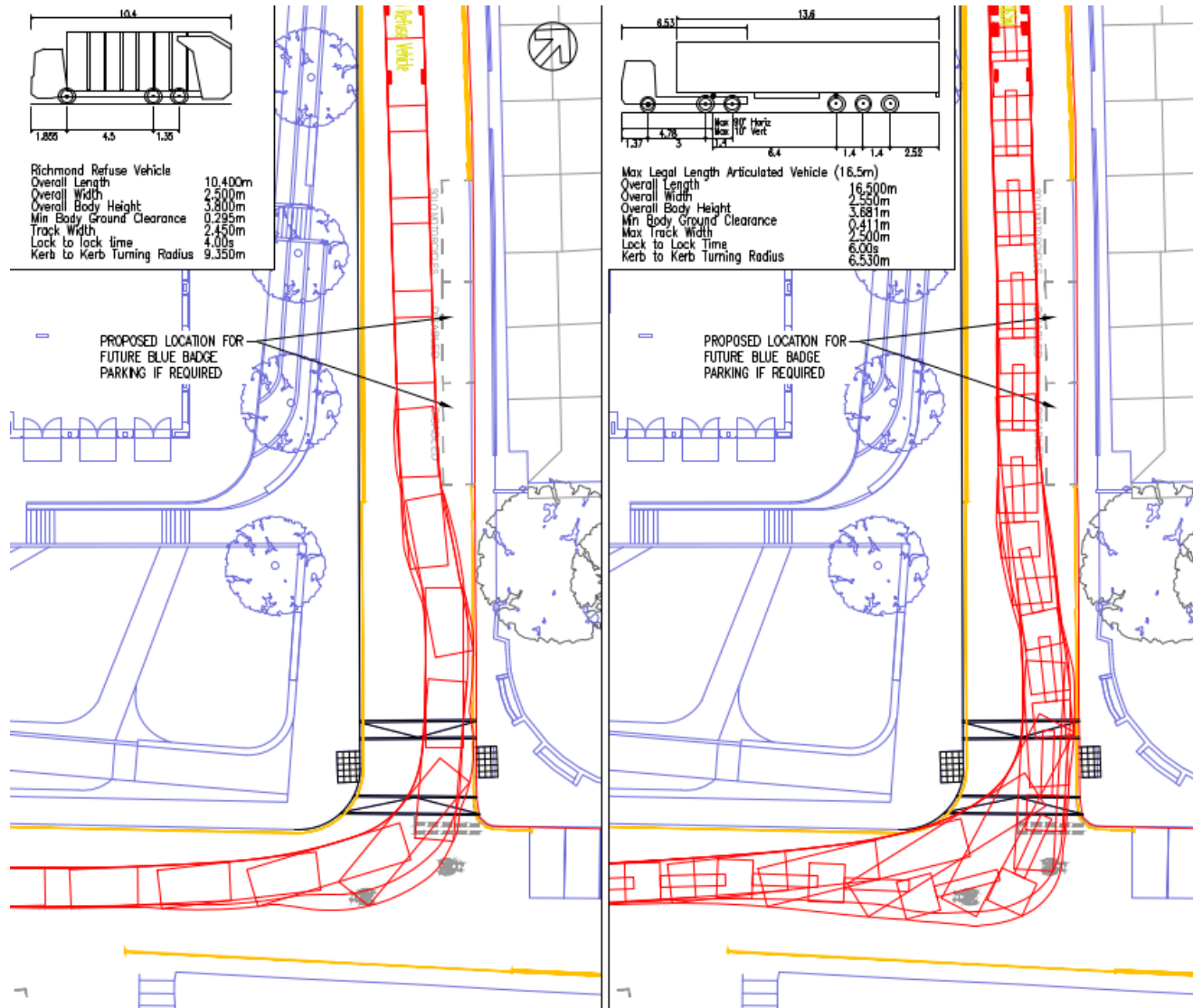




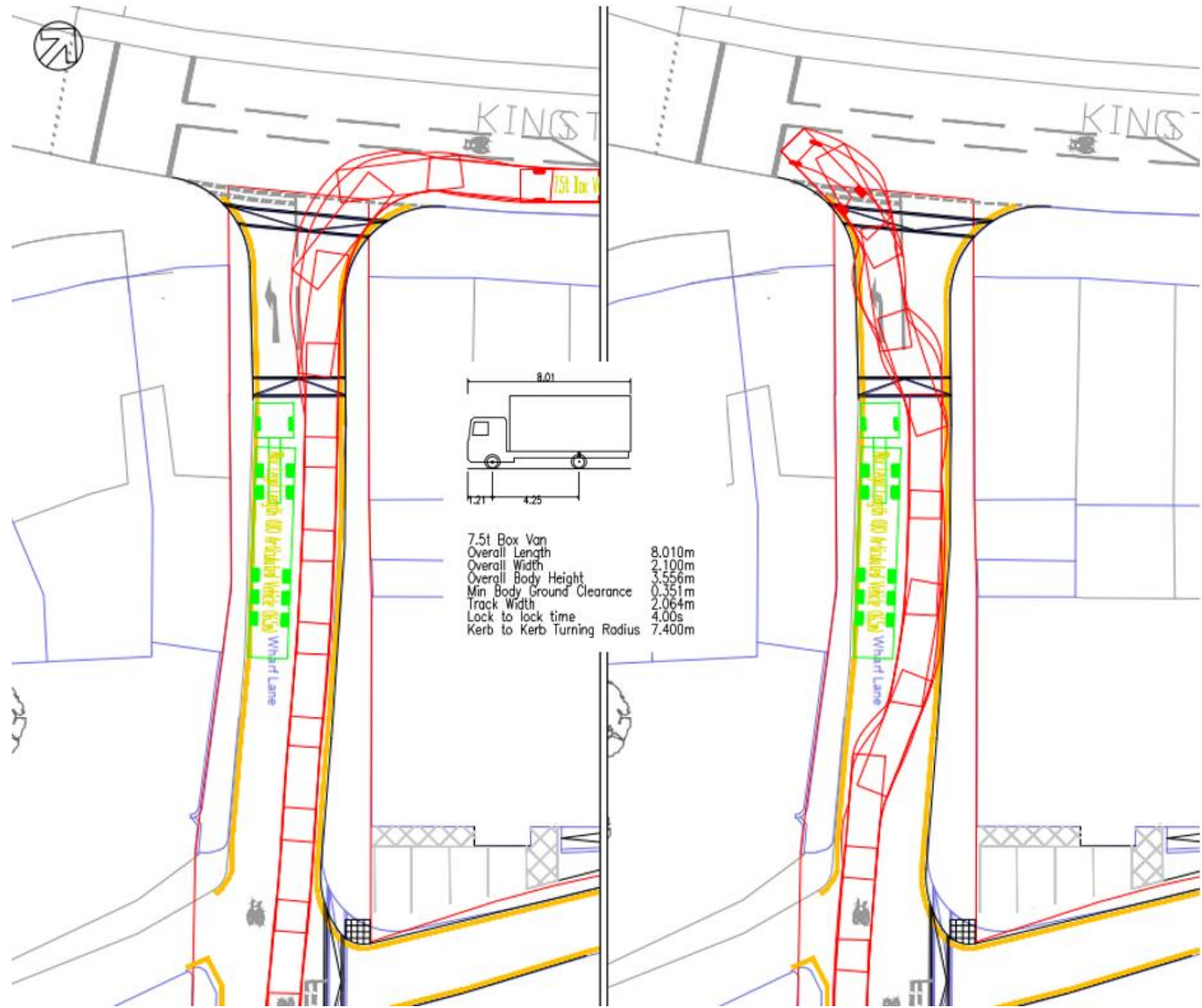
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**Appendix 1**



**Appendix 2**



Appendix 3



Appendix 4



**Appendix 5**

