

TRANSPORT TECHNICAL NOTE

PROJECT	P2105.7 UNITS 2-5 PLOUGH LANE, TEDDINGTON, TW11 9BN
DATE	JUNE 2021
REASON	FULL PLANNING
AUTHOR	ALEXANDER OSBORN BSc Hons, PG Dip, CMILT, FCIHT, FIHE

1. INTRODUCTION

KRONEN has been instructed to prepare this Technical Note to support proposals at Units 2-5 Plough Lane, Teddington, TW11 9BN (in the London Borough of Richmond Upon Thames).

2. SITE INFORMATION

The site is Units 2-5 Plough Lane, Teddington, TW11 9BN.

The site is within a row of storage units of varying sizes; the row originally comprised 8 × storage units.

The site has access from Plough Lane and has no formal vehicle parking.

Union Architecture are project architects. Refer to Union Architecture's accompanying plans and statements for the site location, boundary, layout and photographs.

3. PLANNING HISTORY

Part of the site has had approved / allowed applications for changes of use to a residential dwellings as follows:

- Planning application number "17/3001/GPD16" for Unit 3, Plough Lane, Teddington for the "Change of use from B8 (storage) to C3 (residential use) to create a 1 bedroom unit"; Prior Approval Refused September 2017, Application Permitted on Appeal on June 2018
- Planning application number "17/3003/GPD16" for Unit 4 to 5a, Plough Lane, Teddington for the "Change of use from B8 (storage) to C3 (residential use) to create a 2 Studio units"; Prior Approval Refused September 2017, Application Permitted on Appeal on June 2018

The decision notices for the applications stated:

" ... prior approval is required and refused in relation to the transport and highways impacts of the development by reason of lack of provision of off street parking for the proposed unit(s) and general detrimental impact on local parking amenity."

The refusals were appealed and subsequently allowed in June 2018. The joint appeal decision included the following on transport and parking:

"Main Issue

8. The main issue is the effect of the appeal proposals on street parking in the area.

Reasons

9. Plough Lane is a narrow private road accessed off Field Lane. Its northern side is lined by the rear of properties fronting High Street. Some of these appear to be in residential use. The southern side of Plough Lane is lined with buildings of a similar appearance to the appeal properties. At the time of my site visit vehicles parked informally on Plough Lane, around its junction with Field Lane, significantly restricted the access width.

10. Street parking is available on Field Lane and nearby roads in designated bays. These are within a Controlled Parking Zone (CPZ) which is in effect 0830-1030, Monday to Friday. I noted there were around 5 parking spaces available on Field Lane at the time of my site visit around midday. There appear to be regular bus services passing along High Street. Teddington railway station lies a short distance to the west.

11. None of the proposed dwellings would have off-street parking provision. A cycle and bin storage area would be provided at the eastern end of the row of which the appeal buildings form part.

12. I note the Council's reference to development plan policies relating to parking provision. However, applications for prior approval are not determined in accordance with the development plan. It is the direct highway and transport impact of the development that must be considered in these cases.

13. Each of the dwellings that would be formed by the appeal proposals would be small units. As such I consider they would be suitable for occupation by 1 or 2 people. Potential occupiers of the proposed dwellings would be well aware of the access restrictions, lack of on-site parking and limitations on on-street parking in the area when considering their suitability. They would also be aware of the facilities for cycle storage near the dwellings and the availability of public transport in the area. I therefore consider that this would be likely to attract future occupiers who were not car owners and potentially discourage those who were car owners.

14. The Council has identified pressure for on on-street parking in the area. However, I consider that in light of the appeal sites' lawful uses for storage there must be a balance between the parking demands of the 2 uses. Parking demand for business and residential uses are likely to be different. Businesses are likely to create more day time demand when the CPZ is in effect. Even if a proportion of future occupiers of the proposed dwellings were car owners I consider that this would not significantly increase parking pressure over and above that generated by ongoing storage uses.

15. In light of the above I consider that there are no highway and transport impacts that warrant refusal of the appeal proposals."

It is considered that the inspector found that due to site context (near to a centre with bus and rail services and within a permit parking zone) and in light of the existing storage use the absence of off-street parking would not have an objectionable impact and future occupants would well be aware of parking limitations in advance of occupation.

In addition neighbouring Unit 1 has a recent approval for a change of use to a residential dwelling as follows:

Planning application number "17/3402/GPD16" for the "Change of use from B8 (Storage) to C3 (Residential) to create 1 no. studio flat"; Prior Approval Approved November 2017

The approved dwelling was a studio flat with no vehicle parking.

The officer's report for application 17/3402/GPD16 notes:

"The Transport/Highways comment on the first application concluded that the scheme can be approved subject to a S106 agreement to remove access to resident parking permits. The proposal on two previous occasions was refused for lack of cycle and refuse provision and the second application for lack of sufficient information. The above issues have now been addressed. Subject to above condition being in place no objection is raised on Transport grounds."

4. SITE LOCATION AND PUBLIC TRANSPORT ACCESSIBILITY

This site is within Teddington town centre area boundary.

Teddington town centre is recognised as a "District" centre in Annex Two London's Town Centre Network of the "London Plan" (Greater London Authority, 2016).

"Manual for Streets" (Department for Transport and Department for Communities and Local Government, 2007) includes the concept of the "walkable neighbourhood" which includes the (p.45) "range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot".

Teddington district centre and its amenities and services are within the site's walkable neighbourhood.

An extract from LB Richmond's online "Local Plan Proposals Map" is provided as Enclosure 1 showing the site and centre ([Online] < http://www.cartogold.co.uk/richmond_2015/richmond.htm > [Accessed April 2020]).

The site has access to 6 × bus services; the 33, 281, 285, 481, R68 and X26 services. The 281, 285 and R68 bus services are accessible from stops on High Street. The 481 and X26 services are accessible from stops on Park Road. The 33 bus service is accessible from bus stops on Waldegrave Road (stops C and D, G and H, and A and B respectively).

These bus routes provide a total of approximately 56 × bus services per hour.

The site also has access to rail services from Teddington Railway Station which is approximately 400m walk distance to the south west of the site.

South West Trains' services are accessible from the station.

Teddington Railway Station has approximately 9 × rail services per hour.

Public transport accessibility in London is often quantified and measured using TfL's Public Transport Accessibility Level (PTAL) model.

"Assessing transport connectivity in London" explains PTAL scores as follows (p.6, TfL, 2015):

"PTAL is a measure of connectivity by public transport, which has been used in various planning processes in London for many years. For any selected place, PTAL suggests how well the place is connected to public transport services."

"PTAL values are simple. They range from zero to six, where the highest value represents the best connectivity. For historical reasons, the PTAL value of one is split into two categories (1a and 1b) and the PTAL value of six is split into two categories (6a and 6b). All together there are nine possible values of PTAL: 0, 1a, 1b, 2, 3, 4, 5, 6a and 6b."

"A location will have a higher PTAL if:

- It is at a short walking distance to the nearest stations or stops
- Waiting times at the nearest stations or stops are short
- More services pass at the nearest stations or stops
- There are major rail stations nearby
- Any combination of all the above."

TfL provides an online GIS-based PTAL tool. 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 PTAL score.

TfL's online GIS-based PTAL tool was used to research the site's PTAL score. The PTAL tool calculated the site to have a PTAL score of 3. This PTAL score indicates a "Moderate" level of public transport service availability. Details of the PTAL calculation are provided in Enclosure 2. The PTAL score inherently only considers access to public transport and does not take in to account the Teddington district centre services and amenities which are within the site's walkable neighbourhood as discussed.

Based on all the above, the site is considered to be sustainably located for an Outer London Borough setting, conveniently located for services / facilities on foot and for public transport, and that existing and future occupants need not be dependent on private vehicles.

5. HIGHWAYS AND PARKING

As discussed, the site has access from Plough Lane. It is understood that Plough Lane is an unadopted private road with no legal owner. Storage owners / users, residents and adjoining High Street commercial units with rear access have rights of way on Plough Lane.

Plough Lane is accessed from Field Lane, Field Lane is an unclassified local access road.

The site and surrounding roads are in LB Richmond Permit Controlled Parking Zone T which restricts parking 8.30am to 10.30 am Mondays to Fridays.

The Zipcar car club appears to be the primary car club operator in the local area; Zipcar has several vehicles in and around Teddington town centre, the closest vehicle is on Kingston Lane approximately 300m walk distance to the north east of the site. A Zipcar Map extract is provided in Enclosure 3 showing nearby cars ([Online] < <http://www.zipcar.co.uk/find-cars/en-GB/london> > [Accessed April 2020]).

6. PROPOSAL

The proposal is to replace the existing storage units with a 4 × 2-bedroom 3-person dwellings.

As with the existing site and recent approval the proposal will be "car free" and have no vehicle parking. The car free development will be secured by planning condition.

The proposed dwellings will have a self-contained external bin store and each dwelling will have a Sheffield Stand providing 2 × cycle parking spaces in an external store on land adjoining Unit 1.

Union Architecture are project architects. Refer to Union Architecture's accompanying plans and statements for the proposed layout etc.

7. ANALYSIS

Given the scale and nature of the current proposal the main transport items for the proposal are considered to be: vehicle parking, cycle parking and refuse servicing. These matters are assessed in turn below.

8. ANALYSIS - VEHICLE PARKING

As discussed, the proposal is to replace the existing storage units with a 4 × 2-bedroom 3-person dwellings.

As with the existing site and recent approval the proposal will be "car free" (ineligible to apply for on-street CPZ / council car park parking permits by planning condition) and have no vehicle parking.

It is understood that the existing site has no CPZ permit eligibility restrictions ([Online] https://www.richmond.gov.uk/properties_not_allowed_parking_permits [Accessed April 2020]) and could apply for up to 5 × CPZ T business permits. (In addition to longer duration parking that might require a permit, a commercial use such at the storage unit is also likely to generate numerous short duration vehicle based visits that demand parking.)

The proposals would therefore reduce the potential maximum number of CPZ T permits that could theoretically be demanded by a business at the site from 4 × 5 × permits to nil permits.

The net parking demand of the existing and proposed uses was highlighted in Units 3 to 5a appeal decision notice; Para 14.

In addition to the car free planning condition preventing future occupants obtaining CPZ / council car park parking permits, to further mitigate potential parking impacts, the applicant is willing to accept a 5-year car club membership planning condition (for the Zipcar cars on Kingston Lane and Station Road).

Development Plan parking policy guidance is set out in: Policy LP 45 Parking Standards and Servicing of "Local Plan" (LB Richmond, 2018) and "London Plan" (GLA, 2021) Policy T6 Car parking and T6.1 Residential Parking.

Policy LP 45 refers to standards in Appendix 3.

Appendix 3 states:

Residential car parking standards for PTAL 0 to 3 locations is "1-2 bedrooms 1 space" and cycle parking standards are as per the London Plan.

Policy T6.1 of London Plan refers to Table 10.3.

Table 10.3 provides a maximum parking standard of up to 0.75 spaces per 1 and 2 bedroom dwelling for Outer London PTAL 2-3 locations.

Clauses A, B and C of Policy T6 also state (p.422): "A Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity", "B Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport" and "C An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets".

In addition to Development Plan policy / standards, with regards to levels of residential parking "National Planning Policy Framework" (Ministry of Housing, Communities & Local Government, 2019) states "local car ownership levels" amongst other considerations should be taken into account.

Local car ownership data can be extracted from Census data and this data is considered a significant material consideration in the assessment of parking provisions.

There is a 2011 Census dataset available that shows car or van ownership by number of rooms at Ward level.

This Census data has been obtained to assess car or van ownership by number of rooms in the site's Teddington Ward.

Within the Census data a "room" does not include bathrooms, toilets, halls or landings, or rooms that can only be used for storage but all other rooms, for example, kitchens, living rooms, bedrooms, utility rooms, studies and conservatories are counted.

The proposed 2-bedroom houses are 3 room dwellings.

As shown in Enclosure 4 this Census data shows 45% of similar local dwellings have no cars and projects ownership of 0.63 vehicles per 1-3 room dwellings.

Based on the Census data the proposed dwelling is projected to generate a demand for less than 1 × car per house.

Aside from Census data evidence another significant material consideration in the assessment of parking provisions and impact is planning precedents.

As discussed above in the planning history commentary applications 17/3402/GPD16 at Unit 1, 17/3001/GPD16 at Unit 3 and 17/3003/GPD16 for Units 4 to 5a, Plough Lane were approved / allowed as car free / zero parking development.

As discussed it is considered that the inspector for the appeals for 17/3001/GPD16 at Unit 3 and 17/3003/GPD16 for Units 4 to 5a found that due to site context (near to a centre with bus and rail services and within a permit parking zone) and in light of the existing storage use the absence of off-street parking would not have an objectionable impact and future occupants would well be aware of parking limitations in advance of occupation.

It is noted that the proposed 2-bedroom dwellings are larger than the approved studio and 1-bedroom dwellings, however Development Plan standards and Census data aggregates 1-bedroom and 2-bedroom dwellings and 1-habitable to 3-habitable room dwellings together; for this vehicle parking analysis these units are treated the same.

Using the CPZ permit eligibility restrictions online search tool ([Online] https://www.richmond.gov.uk/properties_not_allowed_parking_permits [Accessed April 2020]) it appears the following nearby car free developments have also been approved:

Field Lane - 07/3000/FUL, 12/3288/FUL

Bridgeman Road - 15/2361/GPD15

High Street - 18/2928/FUL, 06/0645/FUL, 18/1022/FUL, 16/2647/FUL

It is considered that the Plough Lane approvals and those listed above demonstrate that car free housing at this site would be consistent with other nearby approvals.

Based on the: existing site use, proposed use, net change in demand for parking, proposed planning conditions / mitigation measures, Census evidence and planning decisions / precedents it is considered that the car free proposal is acceptable / should be not objectionable.

9. ANALYSIS - CYCLE PARKING

As shown on Union Architecture's accompanying plans the proposal includes a Sheffield Stand providing 2 × cycle parking spaces for each house on land adjoining Unit 1.

Cycle parking policy and standards are discussed above; Policy LP 45 Parking Standards and Servicing of Local Plan and Policy T5 Cycling of London Plan.

The proposal provides cycle parking in accordance with the minimum standards and is therefore considered acceptable. This could be secured by planning condition.

10. ANALYSIS - REFUSE / SERVICING

As shown on the accompanying plans the proposal includes a refuse store on land adjoining Unit 1.

The stores are a short push / pull distance to the public highway; this is within the 20m distance cited in "Refuse and Recycling Storage Requirements Supplementary Planning Document" (LB Richmond, 2015).

Refuse proposals are considered acceptable; refuse arrangements could be secured by planning condition.

11. ANALYSIS - CONCLUSIONS

Based on the above the proposal's vehicle parking, cycle parking and refuse servicing arrangements are considered acceptable / not objectionable.

With regards to transport impacts Paragraph 109 of the "National Planning Policy Framework" includes direction of only preventing or refusing development on transport grounds where "there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe". The proposals is not considered unacceptable / severe in this context and is therefore considered not objectionable in a planning context.

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ENCLOSURES

← → ↻ 🔒 Not secure | cartogold.co.uk/richmond_2015/richmond.htm ☆ 🗨 📄 📄 📄 ⌵

Print Key 🖨️ Print 🗨️ Display Coordinates ON/OFF

Welcome | Key | Search Map ▾ | Query Map ▾ | Map Tools ▾ | Links | [Help / Site guide](#)

Search by point

Eastings: 516206.36

Northings: 171079.98

Show Map Policies

[Help ?](#)

Policy Results

 Town Centre Boundary
DM TC 1

Area at risk from flooding
Please check with the Environment Agency at www.environment-agency.gov.uk

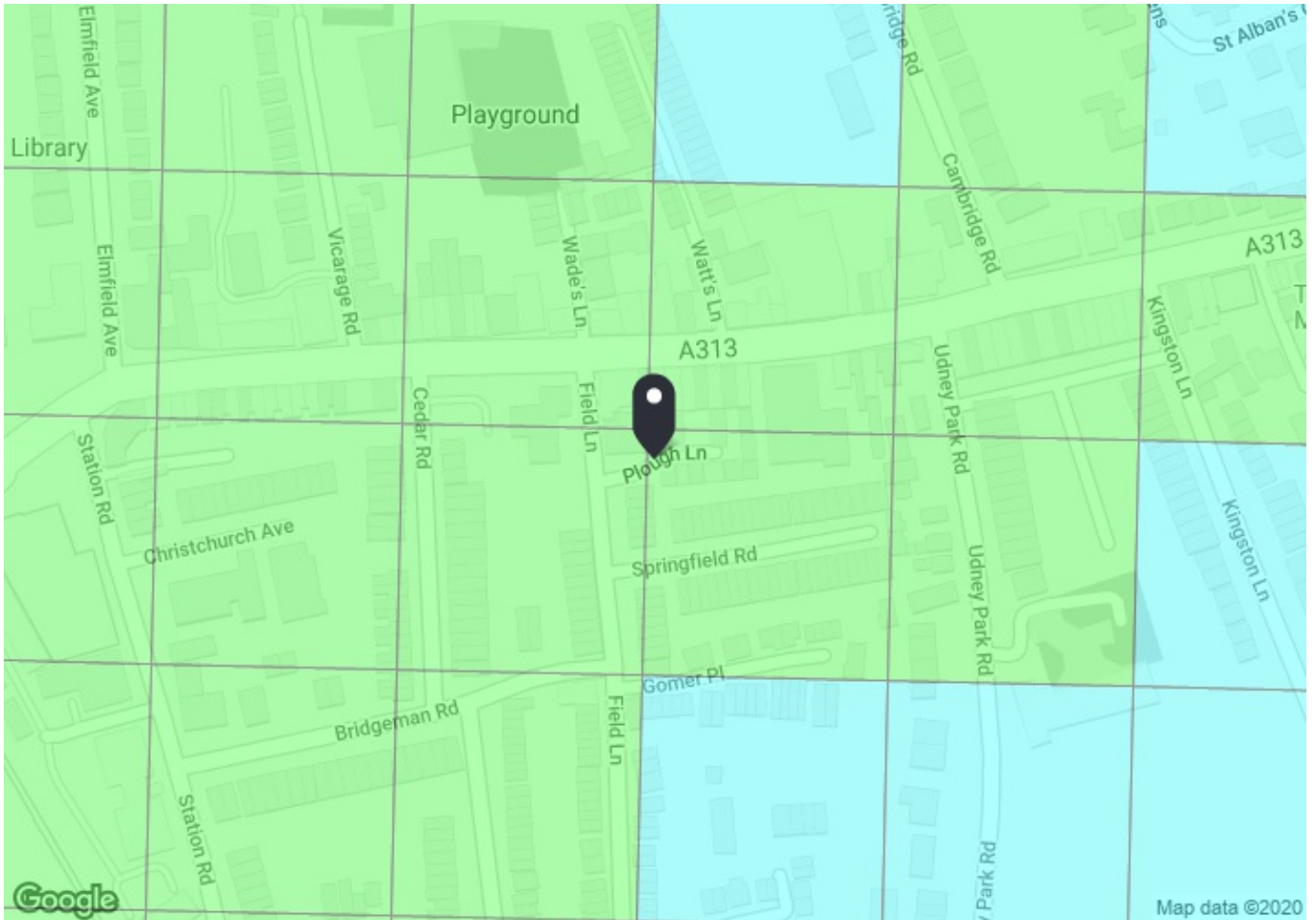
Archaeological Priority Areas
DM HD 4 and Map 1 of DMP; please check with English Heritage at www.english-heritage.org.uk for latest information

E515944.86, N171074.25

SITE (RED CIRCLE)

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London Borough of Richmond upon Thames - Local Plan - Proposals Map, Adopted July 2015 Site maintained by GRM Mapping Limited



PTAL output for Base Year
3

Plough Lane
 Plough Ln, London TW11, UK
 Easting: 516200, Northing: 171082

Grid Cell: 36137

Report generated: 08/04/2020

Map key - PTAL

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

Map layers

PTAL (cell size: 100m)

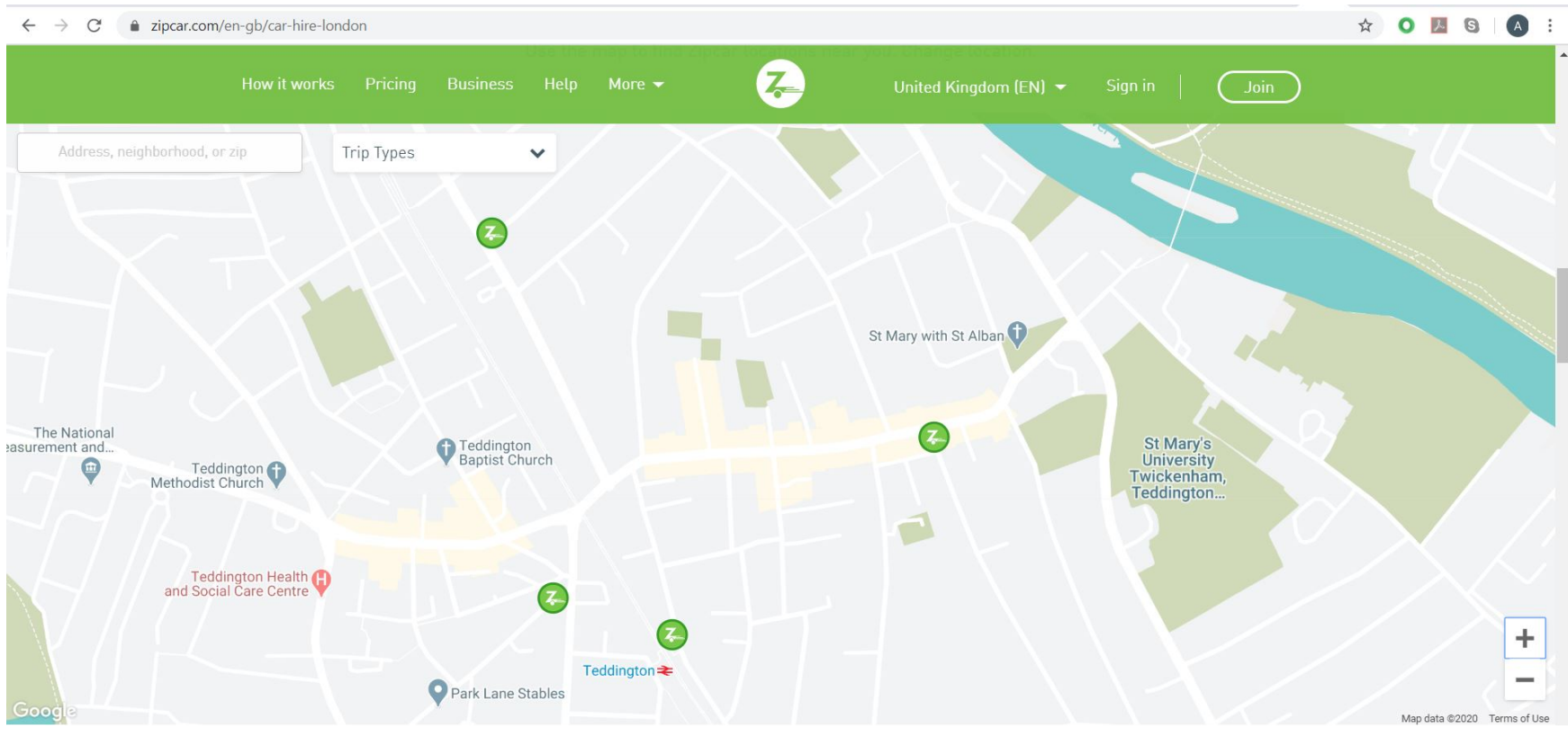
Calculation Parameters

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	TEDDINGTON HIGH STREET	281	316.28	7.5	3.95	6	9.95	3.01	1	3.01
Bus	TEDDINGTON HIGH STREET	285	316.28	6	3.95	7	10.95	2.74	0.5	1.37
Bus	TEDDINGTON HIGH STREET	R68	316.28	4	3.95	9.5	13.45	2.23	0.5	1.12
Bus	TEDDINGTON PARK ROAD	481	606.14	1	7.58	32	39.58	0.76	0.5	0.38
Bus	TEDDINGTON PARK ROAD	X26	606.14	2	7.58	17	24.58	1.22	0.5	0.61
Bus	TEDDINGTON LIBRARY	33	496.89	7.5	6.21	6	12.21	2.46	0.5	1.23
Rail	Teddington	'WATRLMN-SHEPRTN 2H09'	484.62	2	6.06	15.75	21.81	1.38	1	1.38
Rail	Teddington	'SHEPRTN-WATRLMN 2H10'	484.62	2	6.06	15.75	21.81	1.38	0.5	0.69
Rail	Teddington	'WDON-WATRLMN 2K03'	484.62	0.33	6.06	91.66	97.72	0.31	0.5	0.15
Rail	Teddington	'WATRLMN-WATRLMN 2K09'	484.62	2	6.06	15.75	21.81	1.38	0.5	0.69
Rail	Teddington	'WATRLMN-WATRLMN 2O09'	484.62	2	6.06	15.75	21.81	1.38	0.5	0.69
Rail	Teddington	'TEDNGTN-WATRLMN 2O90'	484.62	0.33	6.06	91.66	97.72	0.31	0.5	0.15
Rail	Teddington	'TWCKNHM-WATRLMN 2O92'	484.62	0.67	6.06	45.53	51.58	0.58	0.5	0.29

Total Grid Cell AI: 11.76



ENCLOSURE 3
EXTRACT FROM ZIPCAR'S ONLINE MAP

PROJECT - P2003.5
 UNITS 1 AND 2 PLOUGH LANE, TEDDINGTON, TW11 9BN
 SHEET - CENSUS 2011 DATA - CAR OR VAN OWNERSHIP BY NUMBER OF ROOMS IN THE TEDDINGTON WARD

	NUMBER OF DWELLINGS							
	DWELLING TYPE	DWELLING TENURE	DWELLING ROOMS	TOTAL VEHICLES	NO VEHICLES	1 VEHICLE	2 VEHICLES	3+ VEHICLES
RAW CENSUS	ALL DWELLINGS	ALL TENURE	1-3 ROOMS	1,091	486	531	67	7
ANALYSIS	ALL DWELLINGS	ALL TENURE	1-3 ROOMS	1,091	486	531	67	7
PROPORTION				1.00	0.45	0.49	0.06	0.01
VEHICLES					0.00	0.49	0.12	0.02
SUM								0.63

SOURCE: ONS