

Our Ref: DH/V913

Planning Officer
London Borough of Richmond
Civic Centre,
44 York Street,
Twickenham
TW1 3BZ

26th July 2023

By E-mail to Mr C. Dolan only

Dear Sir/Madam,

3-4 New Broadway, Hampton Hill, Hampton TW12 1JG

Ardent Consulting Engineers (ACE) have been instructed to review the transport implications of proposals to consolidate two separate applications for development at 3-4 New Broadway into a single joined proposal for the site.

ACE have previously provided representations in respect to past proposals for this site, specifically in respect to parking demand and to ensure any comments provided by Highways officers at the London Borough of Richmond upon Thames (LBR) were suitably addressed.

These proposals included:

- Rear and roof extension to facilitate the provision of x4 1-bedroom flats, which were approved under application reference 19/3704/FUL;
- Application to remove Condition 5 relating to potential restriction of parking permits in association with the above application, with permission granted under application reference 20/2395/VRC; and
- Ground floor conversion from commercial to x2 new flats plus rear extension to accommodate x1 flat, with approval for the x3 flats in total granted under application reference 22/3328/FUL.

As clarified above, under application reference 20/2395/VRC an application to remove a condition attached to planning permission for residential development at the site was approved. The condition was originally imposed to restrict access to parking permits should a future controlled parking zone be implemented, however it was removed since LBR deemed that a CPZ was not required in the area. As a result no such condition was secured for application reference 22/3328/FUL given a CPZ is not required in the area is in itself an indicator that parking is not a concern locally.

This is borne out in the officers report for 22/3328/FUL which incorporates Highways' officers feedback relating to the proposals and confirms that *"the Council's Transport Officer accepts the view that the development not lead to level of parking stress being pushed to a level above 85%"* and that *"the Council's Transport Officer has no objection to a car free development here. Overall, it was considered that on-street vehicular parking stress within 200m walking distance of the site is well below the threshold of 85%."*

The application site is located on the southern side of the A313 (Hampton Road) in the LBR, positioned centrally within a short parade of six commercial units. The proposal involves no net increase in flats from what has already obtain planning approval. This scheme is simply proposed in order to "merge" more succinctly the two applications into a seamless single, high quality proposal.

The surrounding area is primarily residential in character although there are education, commercial, retail and recreational facilities in the vicinity. There are also opportunities for travel by non-car modes with regular bus services operating from bus stops in the vicinity as well as rail services from Fulwell station a short walk to the north of the site.

There is currently no off-street parking provided for the site, however as outlined above, car-free development at this location is appropriate, policy compliant and acceptable to Highways' officer.

No change in parking demand is anticipated from what has previously been assessed under the two separate applications, and for the application that successfully removed the parking permit condition under application reference 20/2395/VRC.

The National Planning Policy Framework (NPPF, 2021) states at paragraph 111 that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe".

Given the findings of this review, we believe that there are no Transport grounds for refusal of a future planning application given the impact could not be considered as "Severe", furthermore that there would be no discernible impact given the proposals simply involve amalgamating two approved schemes into a single joined up development of the site.

Yours sincerely

David Howson

David Howson
Associate

dhowson@ardent-ce.co.uk