



**Roehampton Café
Richmond Park**
Transport Statement

On behalf of **The Royal Parks**



Project Ref: 332110545/5500 | Rev: P03 | Date: July 2024

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Contents

1	Introduction.....	6
1.1	Overview.....	6
1.2	Development Proposal	6
1.3	Site Location.....	6
1.4	Existing Site.....	7
1.5	Pre-Application Discussions.....	7
1.6	Report Structure	7
2	Site In Context	8
2.1	Site Location and Description.....	8
2.2	Land Use	8
2.3	Café Access	9
2.4	Richmond Park Access	9
2.5	Car Parking Provision.....	10
2.6	Cycle Parking Provision	10
2.7	Existing Parking Accumulation	10
3	Existing Travel Connectivity	13
3.1	Pedestrian & Cycle Access	13
3.2	Bike Hire	14
3.3	Public Transport	15
3.4	Local Highway Network.....	16
3.5	Strategic Highway Network	17
4	Development Proposals.....	18
4.1	Overview of Proposals	18
4.2	Site Access.....	19
4.3	Delivery and Servicing.....	19
4.4	Car Parking Provision.....	19
4.5	Cycle Parking Provision	21
4.6	Staff Travel Plan Statement (TP)	21
4.7	Outline Construction Logistics Plan (CLP)	21
4.8	Delivery and Servicing Plan (DSP).....	21
5	Highway Impact	22
6	Summary & Conclusion	23
6.2	Existing Roehampton Café Site	23
6.3	Existing Site Connections.....	23
6.4	Development Proposals	23
6.5	Highway Impact.....	24
6.6	Conclusion.....	24

Figures

Figure 1.1: Site Location Plan 6
Figure 2.1: Site Context Plan..... 8
Figure 2.2: Location of Roehampton Café in context with Richmond Park..... 9
Figure 2.3: Existing Weekday Car Parking Accumulation 11
Figure 2.4: Existing Weekend Cycle Parking Accumulation 11
Figure 3.1: Tamsin Trail..... 13
Figure 3.2: National Cycle Network Route 14
Figure 3.3: PIC Analysis 16
Figure 4.1: Roehampton Café Proposals 18
Figure 4.2: Proposed Car Parking Accumulation 20

Tables

Table 2.1: Existing Car Parking Provision 10
Table 3.1: Bus Timetable..... 15
Table 4.1: Proposed Car Parking Provision and Net Change from Existing 20

Appendices

Appendix A Site Plan
Appendix B LBRuT Pre-Application Response
Appendix C Link Count Data
Appendix D Technical Drawings

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1 Introduction

1.1 Overview

- 1.1.1 This Transport Statement (TS) has been prepared by Stantec on behalf of The Royal Parks (TRP) to accompany the detailed planning application for the redevelopment of the existing Roehampton Café located within Richmond Park, London.
- 1.1.2 This TS forms part of the transport related documentation set to accompany the planning application, including a Travel Plan Statement (TP), Construction Logistics Plan (CLP), and Delivery and Serving Plan (DSP). These documents should be read in conjunction with this TS.

1.2 Development Proposal

- 1.2.1 The development proposals are for the demolition and rebuild of the Café along with new visitor facilities. These visitor facilities include toilets and bike hire hub, enhanced landscaping and new vehicle access along Priory Lane. The new café will retain the existing land use Class E(b).
- 1.2.2 An illustrative plan is submitted with the planning application, which identifies the extent of the proposed development, and the scheme assessed for the purposes of this report. **Appendix A** illustrates the ground floor plan for the site.

1.3 Site Location

- 1.3.1 The Roehampton Café site is located in the northeast of Richmond Park, within the London Borough of Richmond-upon-Thames (LBRuT). The boundary of the site is shown in **Figure 1.1**.

Figure 1.1: Site Location Plan



1.4 Existing Site

- 1.4.1 The existing site includes a café building with external seating areas, other ancillary facilities (including toilets and bike hire hub), landscaping and car/cycle parking.

1.5 Pre-Application Discussions

- 1.5.1 This TS has been prepared in line with the formal and requisite pre-application engagement process with LBRuT carried out in April 2021.
- 1.5.2 A Transport Scoping Note (TSN) was submitted to LBRuT (*dated April 2021, reference: TN001*) which formed part of a package of pre-application reports across multiple disciplines.
- 1.5.3 LBRuT provided a pre-application response letter November 2021 which included a section outlining advice with respect to transport and highways. The LBRuT response letter is included within **Appendix B**.
- 1.5.4 LBRuT's response set out the following:
- Inclusion of visibility splays in TS;
 - Existing car park utilisation study to be undertaken;
 - Disabled parking provision to be provided as per London Plan;
 - Inclusion of Construction logistics Plan (CLP) as part of submission;
 - Electric Charging provision to be provided as per London Plan; and
 - Inclusion of Travel Plan Statement in planning submission.
- 1.5.5 This TS has been prepared as per the content and methodology set out in the TSN with further clarification suitably provided to satisfy each of the queries/comments raised by LBRuT.

1.6 Report Structure

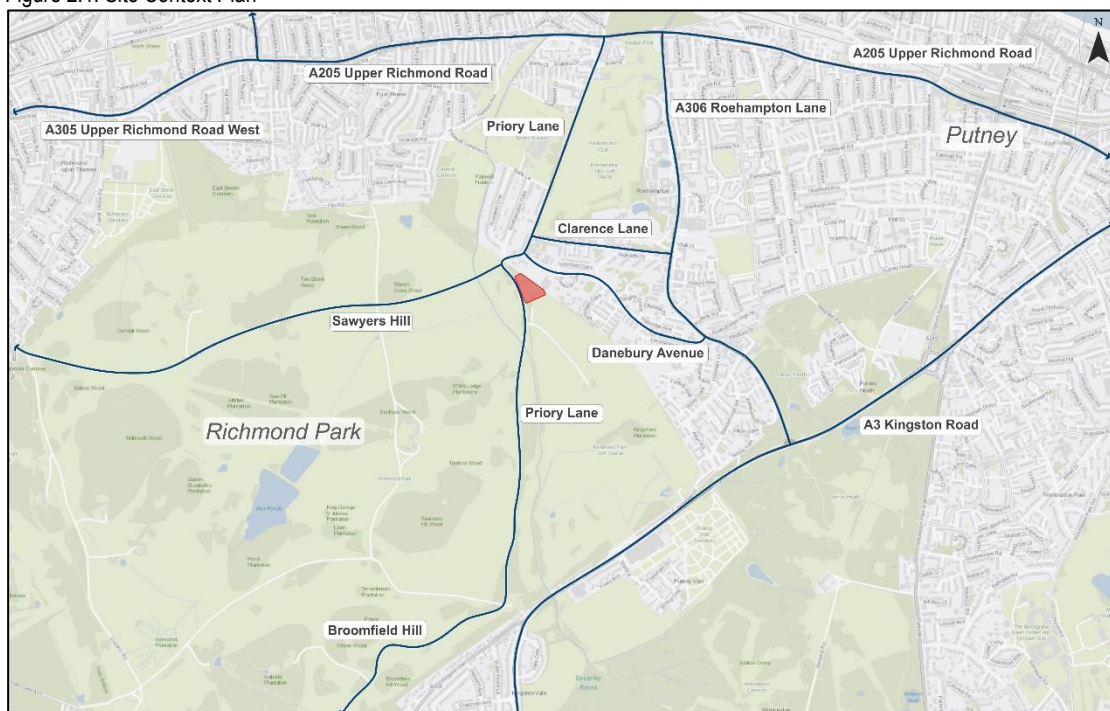
- 1.6.1 The structure of this report is as follows:
- **Section 2 – Site in Context:** This section provides details of the existing site with respect to its land uses, parking provision and daily accumulation, and access proposals.
 - **Section 3 – Existing Travel Connectivity:** This section provides details of available travel.
 - **Section 4 – Development Proposals:** This section provides details of the development proposals with respect to parking provision, access, delivery, and servicing.
 - **Section 5 – Highway Impact:** This section provides a summary of the highway impact anticipated by the development.
 - **Section 6 – Summary and Conclusion:** This section seeks to provide a summary of the content provided within the TS and outline conclusions of the assessment transport and highways implications of the planning application.

2 Site In Context

2.1 Site Location and Description

- 2.1.1 The Roehampton Café site is located in the northeast of Richmond Park adjacent to Priory Lane, c.180m south of Roehampton Gate. The site is located within the LBRuT.
- 2.1.2 Richmond Park is owned and managed by TRP, with the internal park road network not part of LBRuT's highway network. The location of the site in context with surrounding area is shown in **Figure 2.1**.

Figure 2.1: Site Context Plan



2.2 Land Use

- 2.2.1 The existing site includes a café, bike hire hub, toilets, recreational area, car parking, cycle parking and associated landscaping. The land use classification of the existing site is Class E(b).
- 2.2.2 The café is located within Richmond Park which is frequently used by local residents and for leisure/tourism trips. The café is used throughout the year with busier periods during the summer months.
- 2.2.3 The unique nature of this site means the visitor demand to the café is predominantly generated during the off-peak weekday time periods and throughout the day on weekends. Visitor demand can also be dependent on weather conditions.

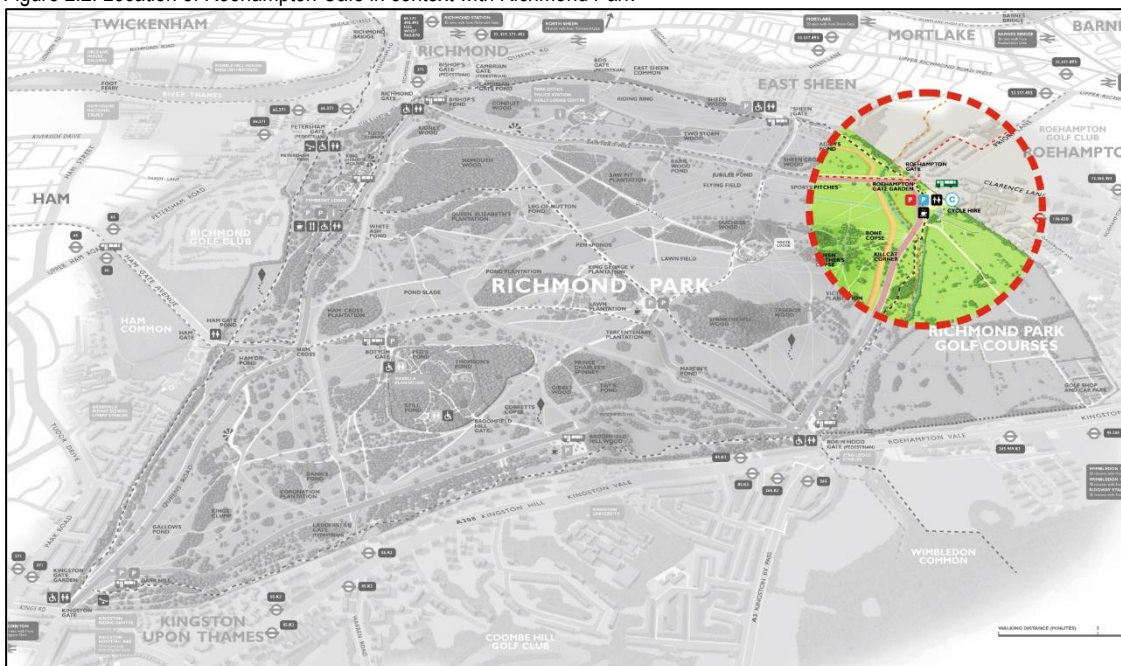
2.3 Café Access

- 2.3.1 The existing café has one formal vehicle access point with Priory Lane at approximately the centre of the site boundary along its western edge. The access takes the form of wide priority junction. It provides access for cars to the car park, and for delivery and servicing vehicles to serve the café.
- 2.3.2 A shared pedestrian and cycle route referred to as 'The Tamsin Trail' runs parallel to Priory Lane, offset from the carriageway by a verge. This trail provides pedestrian and cycle access to the café and crosses the vehicle access junction with an informal crossing.

2.4 Richmond Park Access

- 2.4.1 Richmond Park is managed TRP with access to the park available via five access gates located around the perimeter of the park. Each access gate provides multi-modal access into the park, however all gates are open to vehicles only between 07:00 and dusk each day (varies dependent of time of year). The gates are open to pedestrian and cyclists 24-hours a day¹. An extract from TRPs map of Richmond Park with Roehampton Café highlighted is shown in **Figure 2.2**.

Figure 2.2: Location of Roehampton Café in context with Richmond Park²



- 2.4.2 The café can be accessed via any of the access gates, however based upon its proximity to Roehampton Gate (c.180m to the northwest) it is assumed that the majority of vehicular traffic for the Site enters via this gate. Pedestrian and cycle access is also likely to be undertaken from Roehampton Gate, however given the nature of the park access has the potential to be distributed across all five access gates.

¹ Excluding six week deer culls from November to early December, and February to early March. During these months, pedestrian gates open at 7:30 am and close at 8:00 pm. <https://www.royalparks.org.uk/parks/richmond-park/visitor-information/opening-times-and-getting-here>

² https://www.royalparks.org.uk/data/assets/pdf_file/0017/41642/Richmond-Park-Map.pdf

2.5 Car Parking Provision

- 2.5.1 The existing car parking consists of three different types of parking, these categorised as formal surfaced spaces, informal gravel spaces, and overflow parking (located to the south-east of the site). The total number of existing spaces equates to 245 spaces, of which 4 are allocated as disabled / accessible parking spaces. A breakdown car parking provision for the existing café is outlined within **Table 2.1**.

Table 2.1: Existing Car Parking Provision

Car Parking Type	Total Number of Spaces	Disabled Space Allocation
Formal Surfaced Spaces	156	4
Informal Gravel Spaces	49	0
Overflow Parking Spaces	40	0
Total	245	4

* Disabled allocation inclusive of total

- 2.5.2 A plan of the existing car park layout is contained within **Appendix A**. As visible within this plan, an additional 11 parking spaces are located opposite the existing café terrace, as well as 10 additional informal gravel spaces. These spaces are not included with the parking provision set out in **Table 2.1**. Bollards have been erected to block car parking and create a traffic-free area opposite the café, and.

2.6 Cycle Parking Provision

- 2.6.1 The existing café includes a total of 10 Sheffield stands located at the front of the café building. This provides for cycle parking space for 20 bicycles (two bikes per stand).
- 2.6.2 On-site observations made by the TRP have confirmed that during busy periods, visitors often informally park their bicycles on the wooden deck/terrace at the front of café, or in the surrounding area. This is due to limited amount of formal cycle parking compared to the demand during the busiest periods.

2.7 Existing Parking Accumulation

- 2.7.1 To assess the current usage of the car park at the café, a classified link count was undertaken at the site access between 8th to 10th April 2022. This captured all movement accessing the café between 07:00 to 19:00 (12 hours) for a Friday, Saturday, and Sunday. As per TRP website³, the dusk closing time during this survey period was 19:30.
- 2.7.2 From the data, a car parking accumulation exercise has been carried out to assess the level of usage throughout the day for a Weekday (Friday) and Weekend (Saturday and Sunday).
- 2.7.3 For this assessment It is assumed that no vehicles are present in the car park prior to 07:00, on this basis the starting parking accumulation is zero.
- 2.7.4 **Figures 2.3** and **2.4** overleaf demonstrate the car parking accumulation for the café for a Weekday and Weekend, respectively. The link count data is also included within **Appendix C**.

³ Richmond Park Opening times w/c April 4th 2022, https://www.royalpark.org.uk/data/assets/pdf_file/0020/122681/Richmond-Park-opening-times-2022.pdf

Figure 2.3: Existing Weekday Car Parking Accumulation

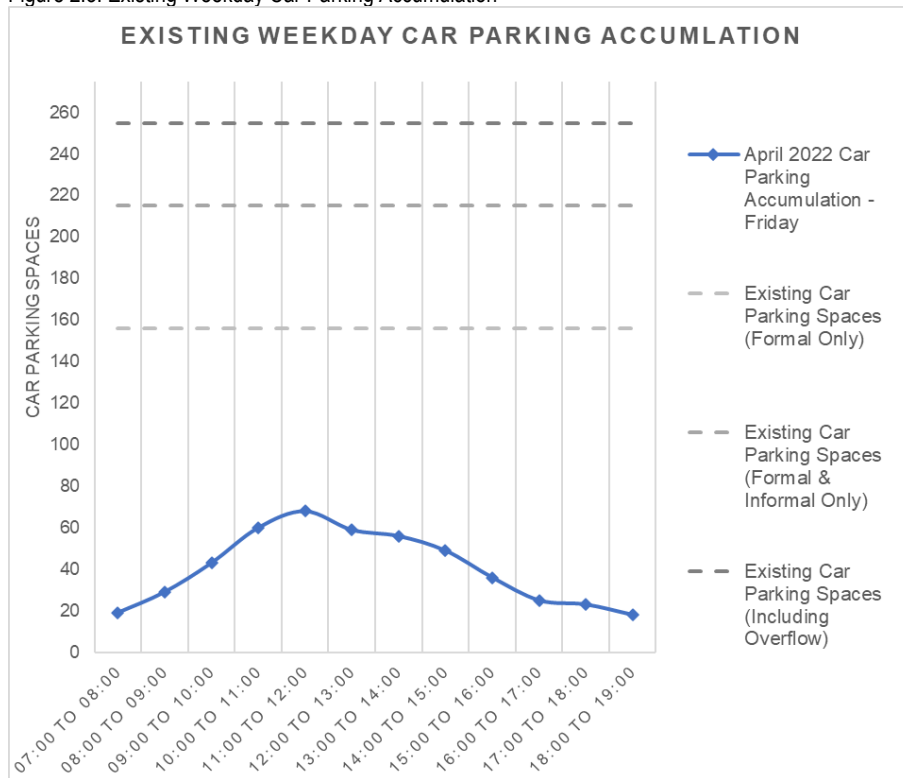
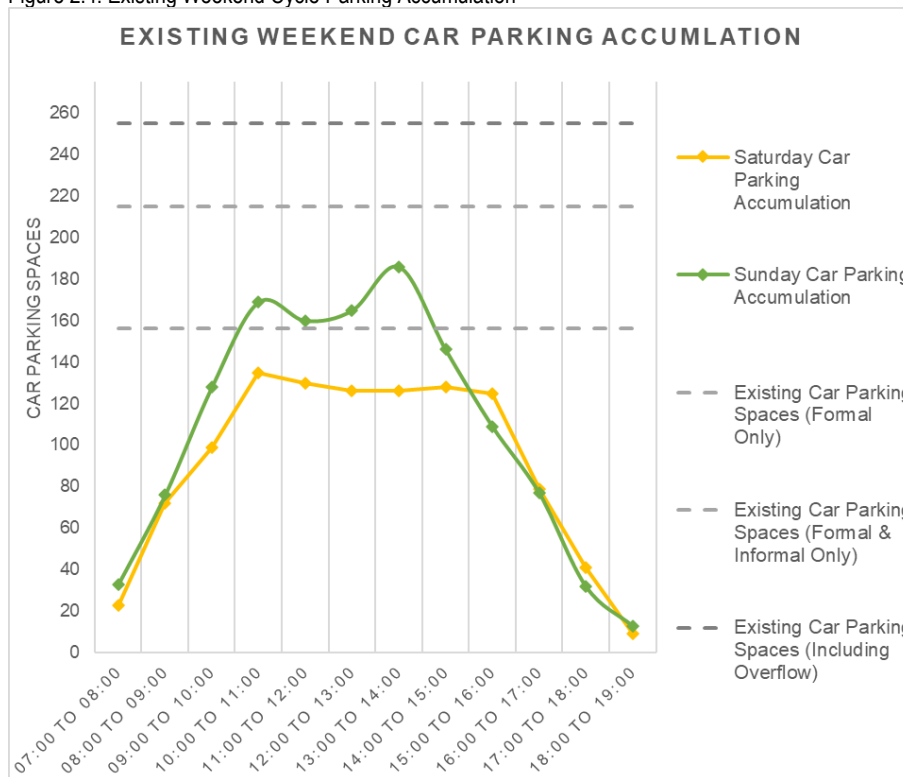


Figure 2.4: Existing Weekend Cycle Parking Accumulation



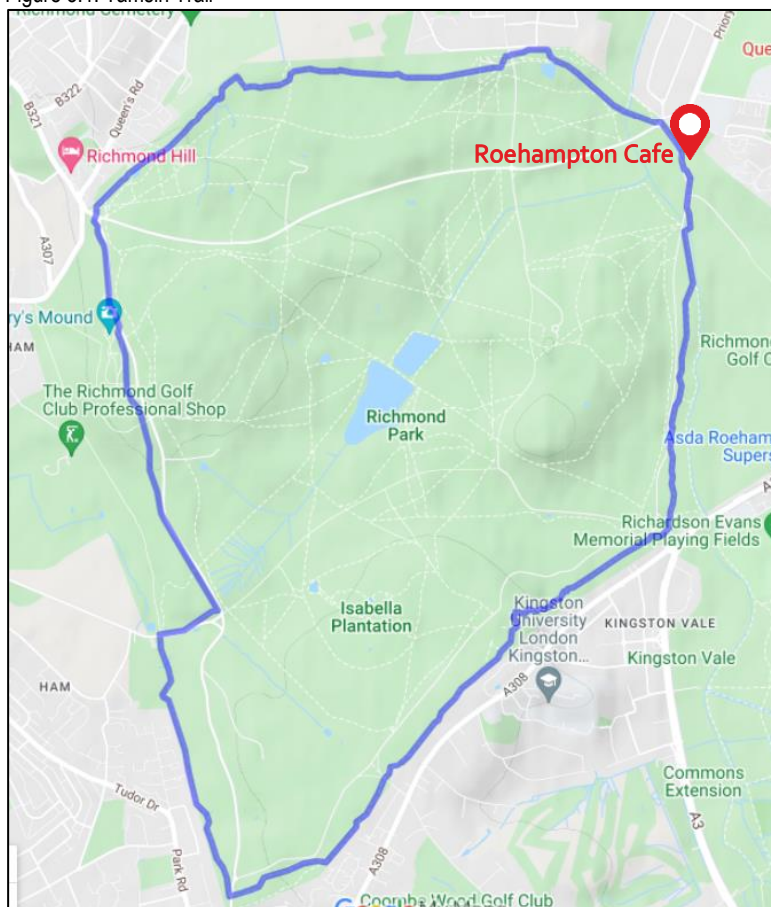
- 2.7.5 This assessment demonstrates that the existing car parking accumulation does not exceed the total number of car parking spaces provided within the car park on both a Weekday and Weekend.
- 2.7.6 The weekend recorded the largest level of car parking accumulation of 156 vehicles between 13:00–14:00. This maximum value does not exceed the provision of formal parking spaces on site with additional informal and overflow parking not utilised.

3 Existing Travel Connectivity

3.1 Pedestrian & Cycle Access

- 3.1.1 Richmond Park includes a number of walking and cycling routes which are predominantly used for leisure trips. The park contains a mixture of formal and informal pedestrian and cycle routes around the perimeter and across the park.
- 3.1.2 The main pedestrian and cycle route within Richmond Park is the 'The Tamsin Trail'. The route is c.11.8km in length (7.35miles) and forms a circuit around the park connecting all five park entrance gates. The route takes c.2.5 to 4 hours to walk, or c.40 to 60 minutes to cycle.
- 3.1.3 The Tamsin Trail is recognised as part of the Sustrans National Cycle Network (NCN). The route is almost entirely car-free with majority of the route offset from the carriageway and separated by landscaping.
- 3.1.4 The Roehampton Café is located adjacent to the Tamsin Trail at the northeast section of the cycle route and provides pedestrians and cyclists direct access to/from Roehampton Gate, and the rest of Richmond Park. An extract of the Tamsin Trail with the Roehampton Café location highlighted is shown in **Figure 3.1**.

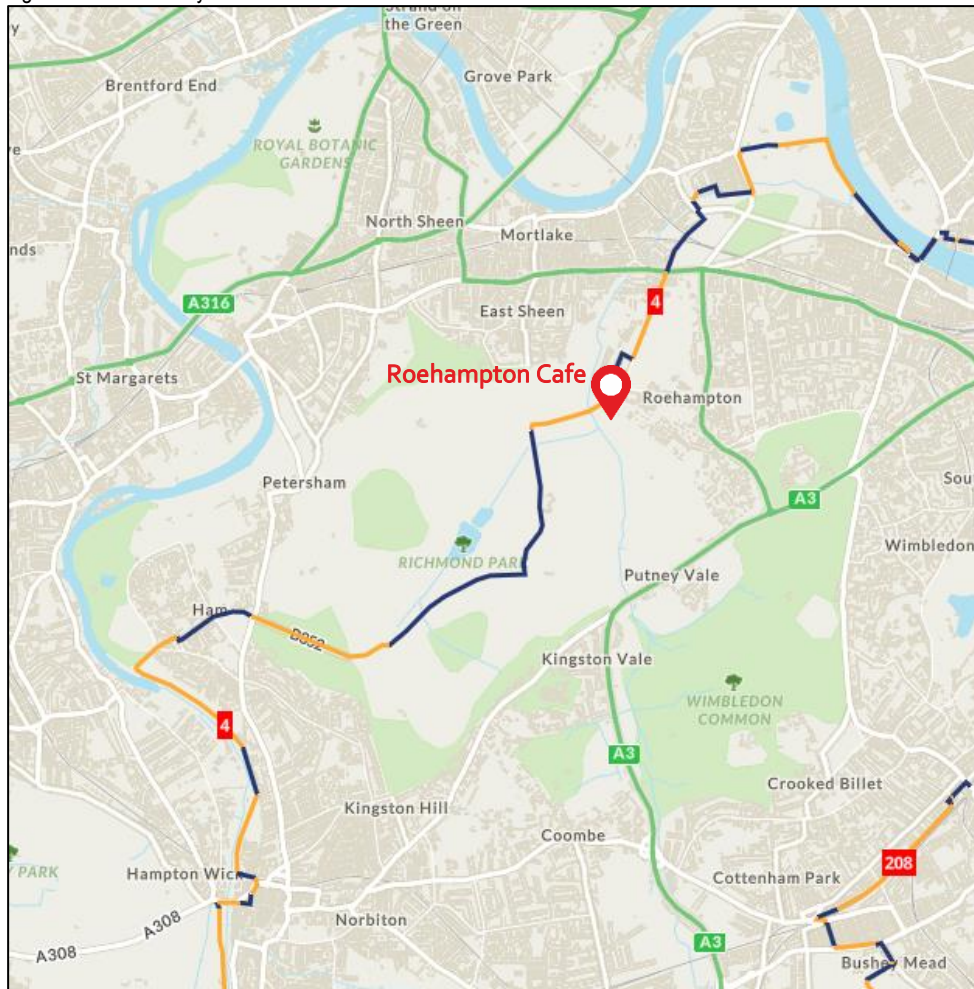
Figure 3.1: Tamsin Trail⁴



⁴ <http://www.richmondparklondon.co.uk/walks/tamsinrail.html>

- 3.1.5 NCN Route 4 passes through the centre of Richmond Park, providing direct cycle connection between Roehampton Gate and Ham Gate and in turn, wider cycle connection into the surrounding areas within London. NCN4 provides connection towards Putney to the east, and Twickenham and Kingston-Upon-Thames to the west. An extract of NCN Route 4 with the Roehampton Café location highlighted is shown in **Figure 3.2**.

Figure 3.2: National Cycle Network Route⁵



3.2 Bike Hire

- 3.2.1 The café currently includes a Bike Hire Hub run by Park Cycle Richmond Park⁶, allowing people to hire bicycles for use within Richmond Park. The service is open weekends all year round and on weekdays between April and September. This service is intended to be retained as part of the proposals as confirmed later in **Section 4**.

⁵ <https://www.sustrans.org.uk/find-a-route-on-the-national-cycle-network/route-4>

⁶ <https://www.parkcycle.co.uk/>

3.3 Public Transport

- 3.3.1 A number of bus services are accessible from Richmond Park with the key bus stops in proximity to the café located along Upper Richmond Road West (to the north), and Roehampton Lane (to the east).
- 3.3.2 The closest bus stop to the site located by the Danesbury Avenue / Minstead Gardens junction, c.510m to the east equating to a 7-minute walk. **Table 3.1** shows the bus services that are provided at this stop.

Table 3.1: Bus Timetable

Service	Route	Monday to Friday		Peak Period Frequency
		First Bus	Last Bus	08:00 – 09:00 & 17:00 – 18:00
170	Danesbury Avenue > Clapham Junction Station > Victoria Station	05:05	00:55	10 minutes
430	Danesbury Avenue > Putney Station > West Brompton Station > Victoria & Albert Museum	05:00	00:35	11 minutes
639	Danesbury Avenue > Smithwood Close > Clapham Junction Station > St John Bosco College	07:11	07:11	-
670	Danesbury Avenue > Clapham Junction Station > St John Bosco College	07:17	07:17	-
N74	Danesbury Avenue > Putney Station > West Brompton Station > South Kensington Station > Baker Street Station	01:10	04:40	30 minutes (between the operating hours)

- 3.3.3 The site is located within a Transport for London (TfL) PTAL rated 0 area. This is due to the context of the site’s location with limited public transport opportunities within Richmond Park.
- 3.3.4 Given the location of the site within Richmond Park and the site being primarily a leisure facility, it is recognised that public transport it unlikely to be the main mode of localised travel to/from the site as walking, cycling, or private car is likely to be favoured.
- 3.3.5 More strategic routing to the site can be undertaken by various rail and bus services available within the surrounding area. Richmond Rail Station is located c.3.5km (as the crow flies) to the northwest of the Roehampton Café which is 15-minute cycle (4.3km). This rail station provides connection to the TfL tube network via the District Line providing wider connection to the rest of London. The station also runs Overground and National Rail services.
- 3.3.6 Other railway stations in the area which only run National Rail services include the following:
- **Barnes Station** 2.2km Northeast, c.8-minute cycle;
 - **Mortlake Station** 2.4km Northwest, c.9-minute cycle;
 - **North Sheen Station** 3.4km Northwest, c.12-minute cycle; and
 - **Putney Station** 3.9km Northwest, c.14-minute cycle.

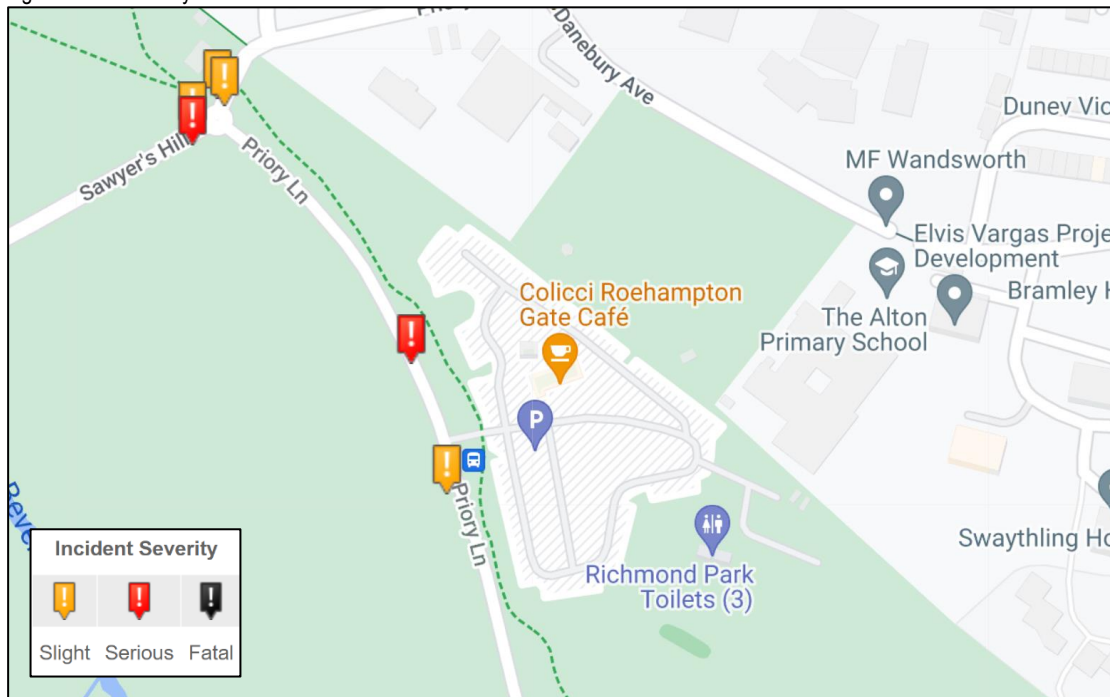
3.4 Local Highway Network

3.4.1 The site is situated on the Priory Lane, a minor road located within Richmond Park and managed by TRP. The Priory Lane connects into the internal Richmond Park highway network with a mini roundabout located c.150m north of the site access. This roundabout provides connection to the east onto Roehampton Gate or to the west which allows vehicles to access Richmond and Sheen Gate, or further afield. All roads within the park are subject to enforced 20mph speed limit.

Personal Injury Collision Data

3.4.2 A review of Personal Injury Collision data (PIC) has been undertaken by assessing the open-source CrashMap⁷ database for the surrounding area to Roehampton Café for a five-year period (2018 to 2022). An extract from CrashMap is shown in **Figure 3.3**.

Figure 3.3: PIC Analysis



Incident Severity	Description
Slight	Injuries that consist of sprains, not necessarily requiring medical treatment, neck whiplash injury, bruises, slight cuts, and slight shock requiring roadside attention.
Serious	Injuries that consist of fracture, internal injury, severe cuts, crushing, burns (excluding friction burns), concussion, severe general shock requiring hospital treatment, detention in hospital as an in-patient, either immediately or later and injuries to casualties who die 30 or more days after the accident from injuries sustained in that accident.
Fatal	Human casualties who sustained injuries which caused death less than 30 days after the collision.

⁷ <https://www.crashmap.co.uk/Search>

- 3.4.3 Figure confirms there were a total of 6 collisions recorded in the 5-year period assessed. Of the 6 collisions recorded, 2 were recorded as 'serious' incident severity and the remaining 4 as 'slight' severity.
- 3.4.4 Based on these results and the context of the café proposals, no highway safety issue/concern has been identified from this reviewed. No further collision data assessment has been undertaken.

3.5 Strategic Highway Network

- 3.5.1 Strategic routing via car is heavily dependent on the location of origin as this will likely decide the choice of access gate into the Park. Given the context of the café's location, it is anticipated the majority of vehicles will route into the site via Roehampton Gate, in turn routing from A205 Upper Richmond Road West to the north, or the A3 to the south.

4 Development Proposals

4.1 Overview of Proposals

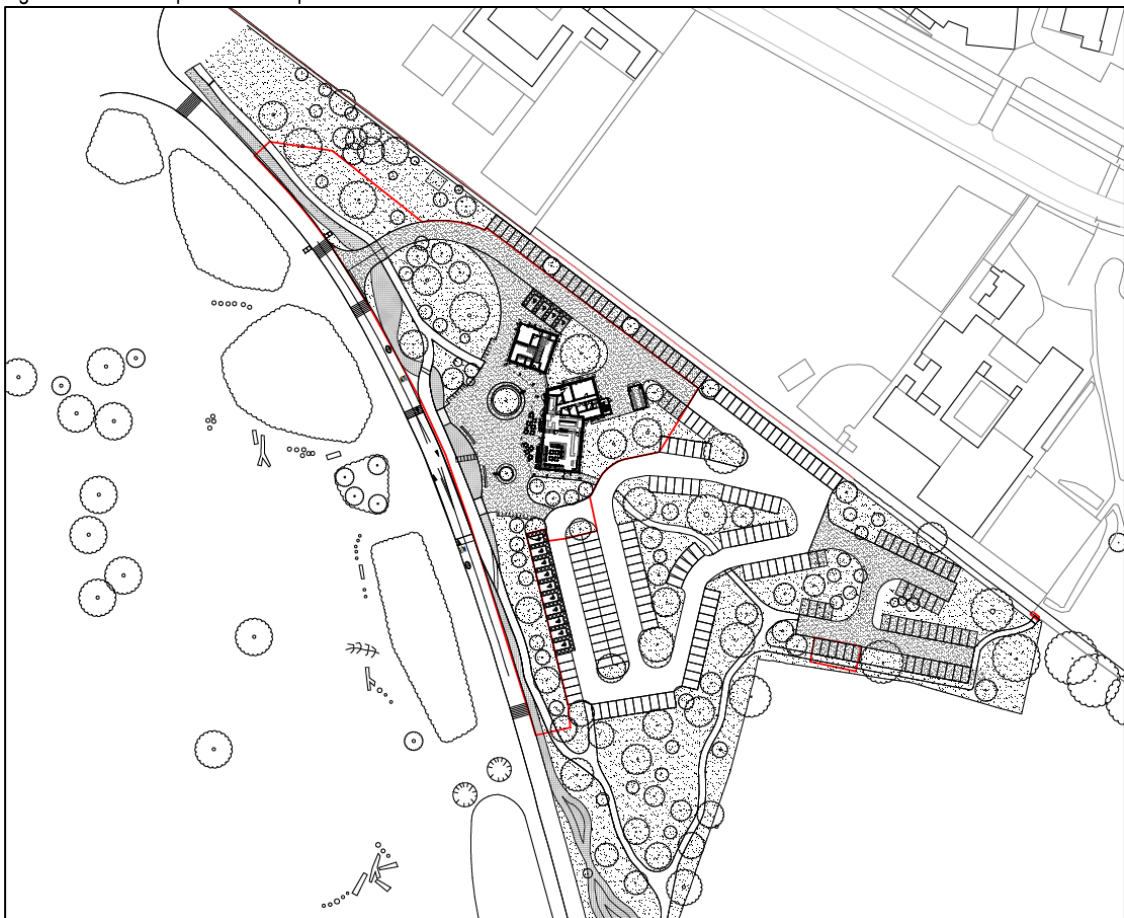
4.1.1 The development proposals for the Roehampton Café include the re-development of the existing café unit to regenerate the site and improve the facility for visitors to Richmond Park. The proposals include the following key elements:

- A new café building with associated toilets and bike hire hub;
- Increased level of cycle parking;
- Formalisation of existing car parking area; and
- New site access.

4.1.2 The proposals seek to demolish the existing café building and construct a new, modern style building in its place with improved facilities. The new café will be as per the existing use class, E(b). The proposals also include a re-developed Bike Hire Hub and toilets which are located in a smaller purpose-built facility adjacent to the new café building.

4.1.3 **Figure 4.1** shows an illustration of the proposed café. The site plan is included in **Appendix A**.

Figure 4.1: Roehampton Café Proposals



4.2 Site Access

- 4.2.1 The proposals seek to remove the existing site access located approximately in the centre of the site boundary and provide a new access to the north on this western boundary. The proposed new vehicular access provides a similar style arrangement to the existing access, taking the form of priority junction with Priory Lane.
- 4.2.2 The access has been designed to accommodate day-to-day car movements to/from the car park as well as larger HGVs for delivery and servicing. The design ensures junction visibility splays can be achieved in accordance with Manual for Streets guidance for 20mph (2.4m x 25m).
- 4.2.3 At the access, an informal crossing arrangement is proposed across the junction. This will be set back from Priory Lane to improve the connectivity of the Tamsin Trail and to enhance the safety of pedestrians and cyclists. The existing café access is to be landscaped and the Tamsin Trail is to be re-connected where previously severed by the junction.
- 4.2.4 Pedestrian and cycle access into the new café is sought via multiple access points along the site frontage connecting into the Tamsin Trail. These are shown on the site plan enclosed within **Appendix A**.

Richmond Park Traffic Calming

- 4.2.5 TRP have recently implemented traffic calming measures across the whole of Richmond Park. These include raised table crossings, road narrowing, and chicanes.
- 4.2.6 One of the areas of traffic calming implemented is in the vicinity of Roehampton Café along Priory Lane.
- 4.2.7 The access proposals presented in **Appendix D** consider these traffic calming measures. The give way chicane to the north of the existing access is proposed to be relocated further south. While the raised table crossing of Prior Lane is to be improved as part of the development proposals and align with the café desire line.

4.3 Delivery and Servicing

- 4.3.1 Delivery and servicing vehicles for the café building will access the site via the new access junction, running towards a servicing area located to the rear of the building. The site access and servicing area will accommodate vehicles for refuse collection, HGV deliveries and servicing as required. Vehicle swept paths for a large refuse vehicle and 10m Rigid Delivery vehicle (the largest anticipated delivery vehicles) are demonstrated in within **Appendix D**.

4.4 Car Parking Provision

- 4.4.1 The proposals for the site include a formalisation of the car park. Resulting in 225 car parking spaces which are accessed from the relocated site access with Priory Lane. The new car park has two types of spaces categorised as formal spaces, and overflow parking (located to the southeast).
- 4.4.2 **Table 4.1** presents the car parking provision included within the proposals and the resulting net change from existing.

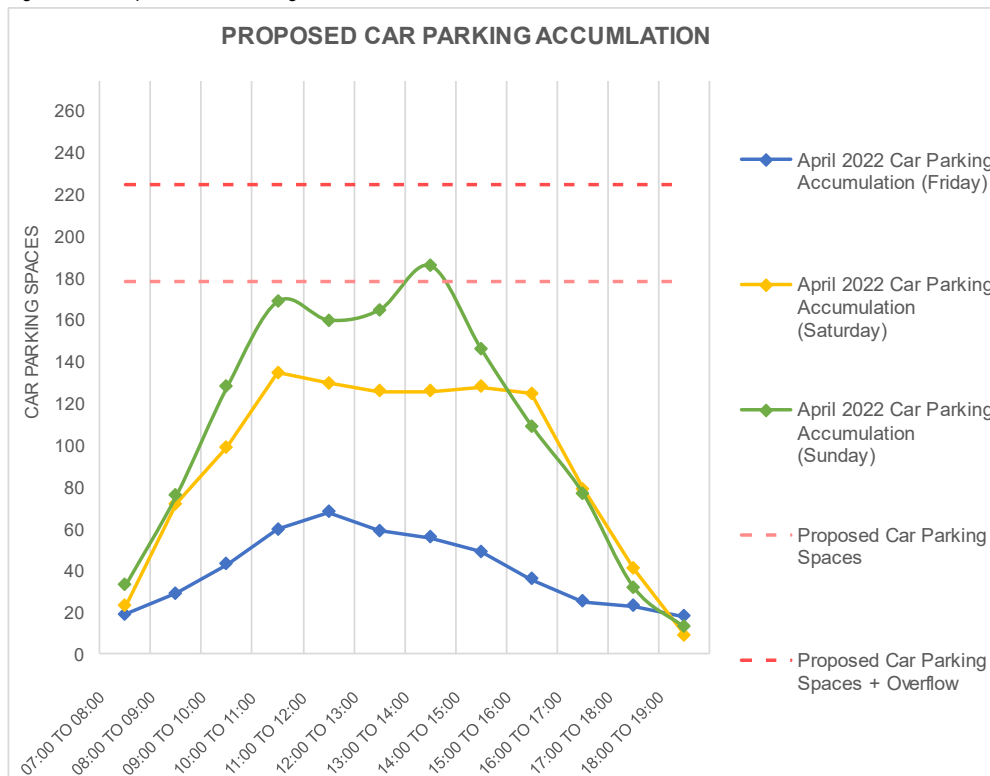
Table 4.1: Proposed Car Parking Provision and Net Change from Existing

Car Parking Type	Proposed Total Number of Spaces	Proposed Disabled Space Allocation	Net Change in Total Spaces	Net Change in Disabled Space Allocation
Formal Spaces	179	14	-26	+10
Overflow Parking Spaces	46	0	+6	0
Total	225	14	-20	+10

Justification of Car Parking Reduction

- 4.4.3 **Table 4.1** demonstrates there is a proposed net reduction in car parking of 20 spaces across the site.
- 4.4.4 As outlined in **Section 2**, a link count was undertaken in April 2022 at the café access on Priory Lane to calculate an existing parking accumulation. The result of the assessment indicated the maximum parking demand was present on a weekend, reaching a peak accumulation of 156 between 13:00 to 14:00.
- 4.4.5 It assumed based on the nature of the proposals which redevelop the existing café, there will not be a significant uplift in vehicular demand from the existing levels recorded in 2022. This notion is supported by the reduced level of car parking provision.
- 4.4.6 **Figure 4.2** shows the existing car parking accumulation plotted with the proposed levels of parking provision to demonstrate at peak car parking demand. There is sufficient provision as part of the proposals, and no risk of overspill onto the surrounding highway network.

Figure 4.2: Proposed Car Parking Accumulation



- 4.4.7 **Figure 4.2** confirms the parking accumulation across the three days assessed does not exceed the proposed parking provision. At the peak on Sunday between 13:00 to 14:00, the accumulation reaches 186 meaning there is still a surplus of 5 spaces within the formal parking area.

Disabled Parking

- 4.4.8 Of the total 225 car parking spaces provided as part of the proposals, 14 are allocated as disabled parking space, equating to a provision of 6.2%. This provision is in line with the London Plan's suggested provision for non-residential developments. The proposed allocation of disabled parking provision is a net increase of 10 spaces from the existing provision.

4.5 Cycle Parking Provision

- 4.5.1 The proposals include an increase in formal cycle parking provision at the site. The proposals include a total of 22 bicycle stands to be located in the forecourt area of the café and adjacent to the toilet / bike hire hub. These stands provide parking for 44 bicycles. This is a net increase of 14 formal bicycle spaces from the existing provision.

4.6 Staff Travel Plan Statement (TP)

- 4.6.1 A Staff Travel Plan Statement (TP) has been prepared as part of the planning application with the objective of maximising opportunities for staff working at the café to travel to the site sustainably. The development proposals also seek to obtain BREEM 'Excellent' accreditation and therefore details of the site's compliance with BREEM category 07: Transport are provided within the TP. This document should be read in conjunction with this TS.

4.7 Outline Construction Logistics Plan (CLP)

- 4.7.1 An Outline Construction Logistics Plan (CLP) has been prepared as part of the planning application with the objective of providing the planning authority with an overview of the expected construction and logistics activity anticipated to occur during the construction phase of the development. This document should be read in conjunction with this TS.

4.8 Delivery and Servicing Plan (DSP)

- 4.8.1 A Delivery and Servicing Plan (DSP) has been prepared as part of the planning application with the objective of reducing the impacts of delivery and servicing activities at a site. These plans aim to minimise disruptions caused by goods and materials movement. This document should be read in conjunction with this TS.

5 Highway Impact

- 5.1.1 As outlined previously in **Section 4** of this TS, the re-development proposals for the Roehampton Café are intended as regeneration of the existing café to improve the quality of facility for visitors to Richmond Park. The proposals do not include significant changes to the existing facilities, and in turn is anticipated traffic generation would be consistent with existing recorded levels with no significant changes caused by the development.
- 5.1.2 The net increase in cycle parking, inclusion of a staff Travel Plan, and reduction in car parking on the site illustrate measures to encourage active travel to/from the site which support a positive impact on the surrounding highway network.
- 5.1.3 The formalisation of the car parking along the relocated access road for the café will result in some interaction between vehicle accessing the site and those parking in these initial parking spaces.
- 5.1.4 The row of formalised parking spaces commences c.40m from the site access junction. This distance allows sufficient time and space for vehicles to manoeuvre into / out of the initial parking spaces without resulting in vehicles queuing back onto Priory Lane and impacting the highway network.
- 5.1.5 On this basis of the above, the development proposals are forecast to not result in a significant highway impact. No further assessment of highway impact has therefore been undertaken.

6 Summary & Conclusion

6.1.1 This Transport Statement (TS) has been prepared by Stantec on behalf of The Royal Parks (TRP) to assess the transport and highways implications with respect to a planning application for the Roehampton Café re-development proposals.

6.2 Existing Roehampton Café Site

6.2.1 The Roehampton Café site is located in the northeast of Richmond Park, located within the London Borough of Richmond upon Thames (LBRuT).

6.2.2 The existing site includes a café, bike hire hub, toilets, recreational area, car parking, cycle parking and associated landscaping. The land use classification of the existing site is Class E(b).

6.2.3 The existing café has one vehicle access point in the form of a priority junction on the Priory Lane. The site provides a total of 225 car parking spaces and 22 cycle parking stands (catering for 44 bikes).

6.3 Existing Site Connections

6.3.1 Richmond Park includes various walking and cycling routes which are predominantly used for leisure trips. The main pedestrian and cycle route is referred to as the Tamsin Trail which passes round around the perimeter of the Park providing connection to each access gate. National Cycle Network Route 4 passes through the centre of the park providing connection east and west from the Café.

6.3.2 It is recognised that public transport is unlikely to be the main mode of localised travel to/from the site as walking, cycling, or private car is likely to be favoured. More strategic routing to the site however can be undertaken by various rail and bus services available within the surrounding area including rail stations (such as Richmond Rail Station) and bus stops in the surrounding area.

6.3.3 The café is located c.180m from Roehampton Gate which provides vehicular connection to the site. More strategic routing is dependent on location of origin but is likely to be undertaken from A205 Upper Richmond Road West (to the north of the site) or the A3 (to the south of the site).

6.4 Development Proposals

6.4.1 The development proposals include the re-development of the existing café unit to regenerate the site and improve the facility for visitors to Richmond Park. The proposals include a new café building with associated toilets and bike hire hub.

6.4.2 The proposals seek to remove the existing site access and provide a new vehicular access with a zebra-style crossing across the junction. Pedestrian and cycle access to the site is sought via multiple access points from the Tamsin Trail.

6.4.3 A total of 225 car parking spaces are proposed at the site, equating to a net reduction of 20 spaces. This reduction is not anticipated to result in overspill parking to the surrounding highway network and is confirmed by the parking accumulation assessment.

6.4.4 A total of 44 cycle parking spaces are proposed at the site, equating to net increase of 14 cycle parking spaces. This increase provision is in light of on-site observations of the existing café indicating insufficient cycle parking, requiring visitors to informally park their bicycles.

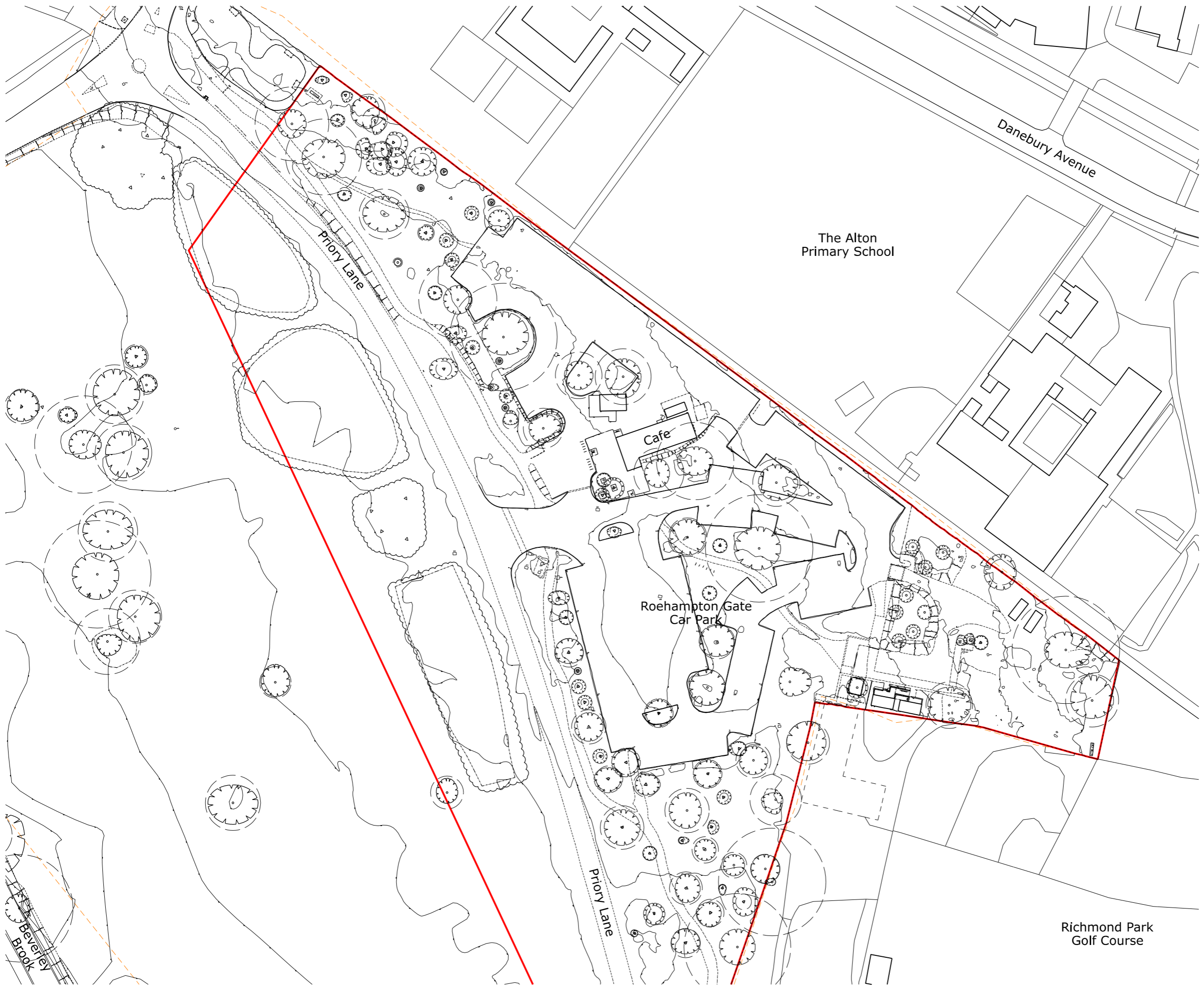
6.5 Highway Impact

- 6.5.1 The re-development proposals for the Roehampton Café are intended as regeneration of existing café to improve the quality of facility for visitors to Richmond Park. On this basis, the proposals are not expected to have a material impact on the operation of the local highway network.

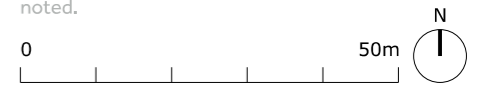
6.6 Conclusion

- 6.6.1 The National Planning Policy Framework (NPPF) states that when considering development proposals, it should be ensured that *“safe and suitable access to the site can be achieved for all users”* and 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”*.
- 6.6.2 This Transport Statement demonstrates that proposed redevelopment of the site provides safe and suitable access for all users. While the assessment work undertaken suggests that the development will not have a material impact on the operation or safety of the local highway network.

Appendix A Site Plan



© David Morley Architects
 Do not scale off drawing.
 Check all dimensions on site and advise any discrepancies before commencing work.
 All dimensions in millimetres unless otherwise noted.



Key
 — Site Boundary

Rev.	Date	Description
P1	28/01/21	First Issue

DavidMorleyArchitects

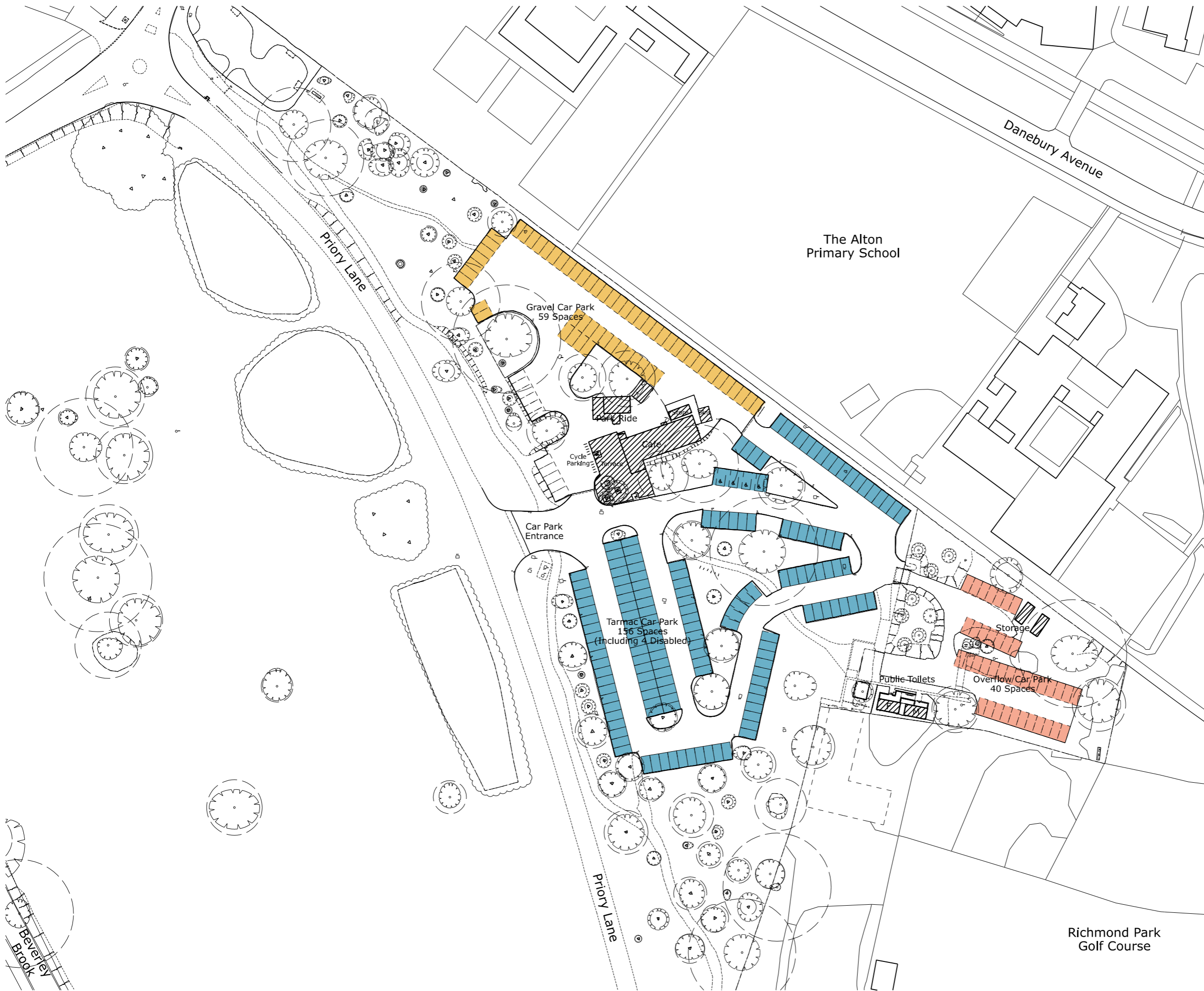
18 Hatton Place, London, EC1N 8RU
 T +44 (0)20 7430 2444
 davidmorleyarchitects.co.uk

Project
 Roehampton Gate, Richmond Park
 Client
 The Royal Parks

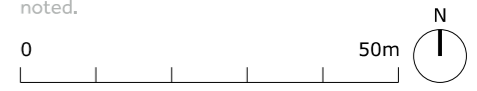
Title
 Site Plan - As Existing

Project / Drawing No	Revision
732-00-002	P1
Date	Scale
28/01/2021	1:1000 @ A3

Richmond Park
 Golf Course



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 Check all dimensions on site and advise any discrepancies before commencing work.
 All dimensions in millimetres unless otherwise noted.



- Key
- Tarmac with lined spaces
156 Spaces
 - Unmarked gravel
59 Spaces
 - Informal overflow parking
40 Spaces
 - ♿ Disabled Spaces (4no.)
- Total Car Park Capacity = 255 Spaces (including 4 Disabled, Including Overflow)**

Rev.	Date	Description
P3	10/05/21	Numbers Updated
P2	08/02/21	Numbers Updated
P1	28/01/21	First Issue

DavidMorleyArchitects

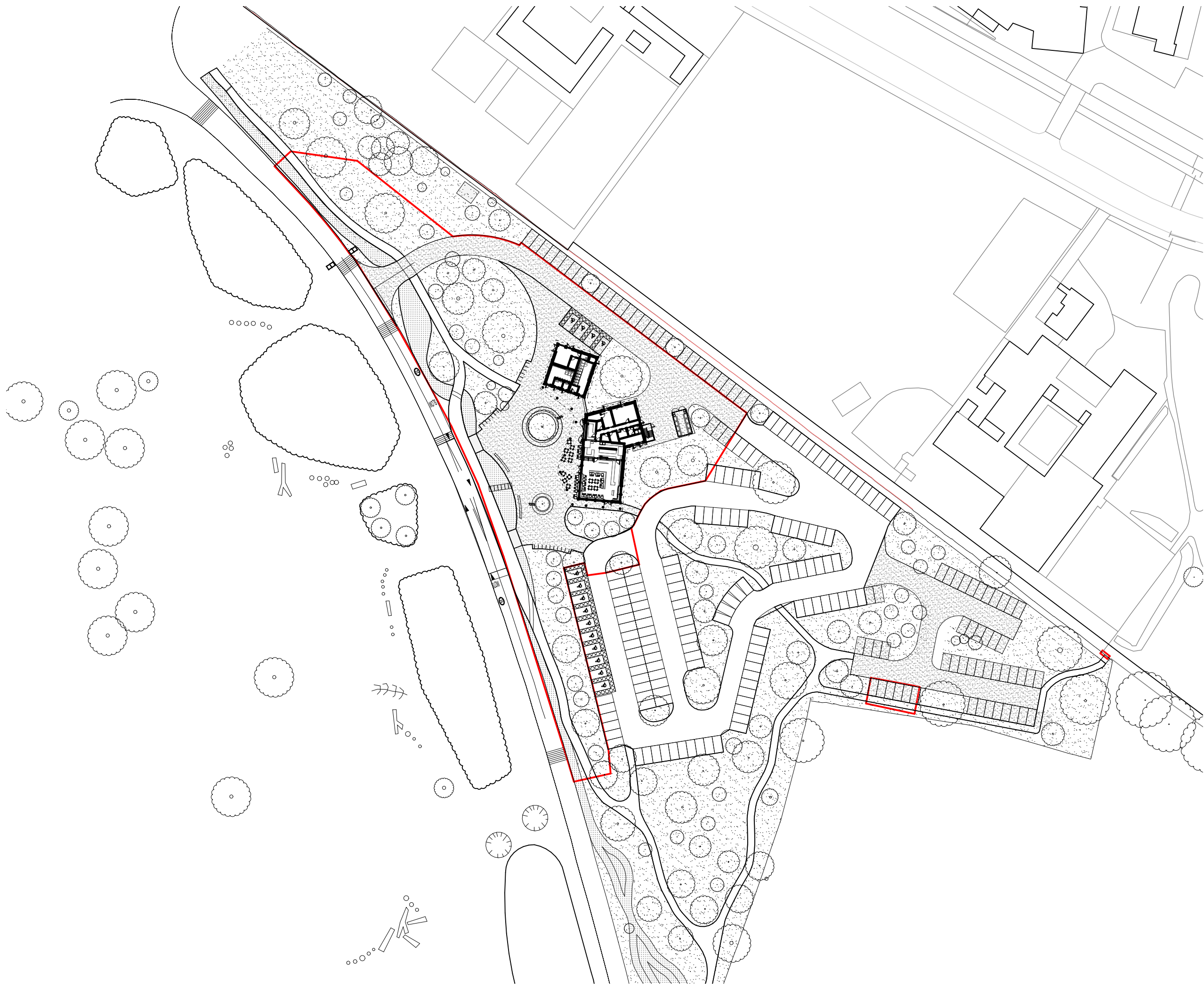
5 Clarendon Road London N22 6XJ
 T +44 (0)20 7430 2444
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Project
 Roehampton Gate, Richmond Park
 Client
 The Royal Parks

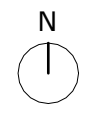
Title
Car Park Analysis

Project / Drawing No	Revision
732-SK-001	P3
Date	Scale
10/05/2021	1:1000 @ A3

**Richmond Park
 Golf Course**



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 All dimensions in millimetres unless otherwise noted.



Key

Rev.	Date	Description
P3	03/07/24	Issue for information
P2	01/07/24	Issue for information
P1	12/04/24	Draft Issue for Planning

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Project
Roehampton Gate, Richmond Park
 Client
The Royal Parks

Title
Site Plan

Project and Drawing Number	Revision
732-15-001	P3
Date	Scale
12/04/2024	1 : 1000 @ A3

Appendix B LBRuT Pre-Application Response

Environment Directorate
PLANNING

Civic Centre
44 York Street
Twickenham
TW1 3BZ
website: www.richmond.gov.uk

Our ref: 21/P0203/PREAPP

Contact: Holly Eley
Telephone: 02088911411
Email: holly.eley@richmondandwandsworth.gov.uk

Name: Phil Jones
Email: phil.d.jones@turley.co.uk

05 November 2021

BY EMAIL ONLY

Dear Phil,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

LOCATION: ROEHAMPTON GATE CAFÉ, RICHMOND PARK, RICHMOND, SW15 5JR
PROPOSAL: DEMOLITION OF EXISTING BUILDINGS, REVISIONS TO SITE ENTRANCES AND LAYOUT, CONSTRUCTION OF NEW CAFE, PUBLIC TOILETS, CYCLE HUB, COMMUNITY SPACE AND TRANSPORT INFRASTRUCTURE, CHANGES TO VEHICLE PARKING, NEW LANDSCAPING AND PLANTING AT ROEHAMPTON GATE CAFE AND CAR PARKING AREA.

I write in reference to your request for pre-application advice.

Site Description

The site is currently occupied by a number of buildings and structures including existing café for park visitors, with a decked seating area, temporary public toilets, a cycle hire building, other cycling infrastructure and car parking. Richmond Park covers an area of approximately 1012 hectares and is designated as a Richmond Park Conservation Area, Metropolitan Open Land (MOL), Public Open Space, Archaeological Priority Area, Site of Special Scientific Interest and Special Area of Conservation.

To the east and south-east lies Alton Estate and Alton Primary School. The park's golf course lies in close proximity which is further designated as Other Site of Nature Importance.

Planning History

11/0054/CAC Demolition of the existing modular buildings at Roehampton Gate following the construction of the new Golf Clubhouse Buildings at Chohole Gate as per Application No. 10/3768/FUL. Granted 10/01/11.

10/3768/FUL Construction of new clubhouse at Chohole Gate, including reception, foyer, shop, cafe, clubrooms, and changing facilities approximately 756 sq m. New carpark providing approximately 164 spaces, 20 bay driving range (non-floodlit) approximately 100 sq m. Granted 07/12/11.

12/3605/FUL Removal of existing front doors and windows and replacement with a timber-framed glazed shopfront, formation of a timber fence storage extension at the rear and installation of three eaves roof windows in the existing location of the windows in the north elevation.. Granted 11/02/2013

Relevant Policies

All Local Plan policies and Supplementary Guidance and Documents are available to view on the Council's website www.richmond.gov.uk. Consideration must also be given to policies in the London Plan and National Planning Policy Statements. Relevant local policies are summarised below (not exhaustive):

National Planning Policy Framework (2021)

London Plan (2021)

D5-Inclusive Design
 D8 – public realm
 D12- Fire Safety
 D14 – Noise
 S4 - Play & informal recreation
 S6 – Public toilets
 HC1- Heritage Conservation and Design
 HC3- Strategic and Local Views
 G3 – Metropolitan Open Land
 G6 – Biodiversity and access to nature
 G7 – Trees and woodlands
 SI2 – Minimising greenhouse gas emissions
 SI 13- Sustainable Drainage
 T5 - Cycling
 T6- Car Parking

These policies can be found at

https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

Adopted Local Plan (July 2018)

- LP 1 - Local Character and Design Quality
- LP 3 - Designated Heritage Assets
- LP4 - Non-Designated heritage Assets
- LP5 – views and vistas
- LP7 - archaeology
- LP 8 - Amenity and Living Conditions
- LP 10 - Local Environmental Impacts, Pollution and Land Contamination
- LP12 – green infrastructure
- LP13 – MOL
- LP15 – biodiversity
- LP16 - trees
- LP 17– Green Roofs and Walls
- LP 20 – Climate Change Adaptation
- LP21 – flood risk and sustainable drainage
- LP 22 – Sustainable Design and Construction
- LP 28 – Social and Community Infrastructure
- LP 29 – Education and Training
- LP 30 – Health and Wellbeing
- LP31 – Public open space, play space, sport and recreation
- LP 40 - Employment and Local Economy
- LP43 – Visitor Economy
- LP 44 - Sustainable Travel Choices
- LP 45 - Parking Standards and Servicing

Supplementary Guidance

- Design Quality

- Development Control for Noise Generating and Noise Sensitive Development
- Refuse and Recycling Storage Requirements
- Sustainable Construction Checklist
- Transport SPD

Other Local Strategies or Publications

Other Strategies or publications material to the proposal are:

- Community Infrastructure Levy
- Strategic Flood Risk Assessment 2020 (updated 2021)

A site visit was undertaken and subsequently a pre-application meeting was attended on 17th August 2021.

Metropolitan Open Land

The site lies within the designated Metropolitan Open Land, where policies related to Green Belt applies. The fundamental aim of these policies is to permanently protect the openness of designated land. National planning policies on Green Belt land set out within the NPPF apply to MOL, as set out in London Plan policy G3. In line with policy LP13 of Local Plan (2018), the Borough's Metropolitan Open Land (MOL) will be safeguarded, retained in predominately open use and there is a strong presumption against inappropriate development in designated MOL.

Paragraph 148 of the NPPF states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt.

Paragraph 149 of the NPPF sets out that a local planning authority "should regard the construction of new buildings as inappropriate in the Green Belt", and then goes on to list exceptions to this principle. Paragraph 150 goes on to state that certain other forms of development are appropriate in the green belt provided they preserve its openness and do not conflict with the purposes of including land within it. The practical effect is that it is open to the Council to conclude that the scheme is not inappropriate in MOL if it fulfils a three-limbed test. The development must:

- (i) be "appropriate" facilities;
- (ii) preserve openness; and
- (iii) not conflict with the purposes of including land within the MOL.

It is noted that the follow up letter has included existing floorspace areas.

The new development will have four distinct uses:

1. A bicycle rental facility (currently operated by Park Cycle) (45sqm)

Under the NPPF para 149 (d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces, is considered an exception to MOL policy. From the officer's review of the OS and aerial imagery it would appear that the existing facility is some 32sqm in area and modest in height and design, although it is noted that the planning statement cites the existing floorspace as 52sqm. The proposed workshop is 40sqm with an additional WC of 5sqm. Clarification on existing floorspace figures, survey plans and elevations will be required to make an informed judgement as to whether the scheme meets this exception.

2. Public toilets (76sqm)

Similarly to the above, plans and elevations will be required to make an informed judgement as to whether the proposal will be materially larger than the existing. It would appear from that the proposals would represent an approx. doubling of floorspace which would have to be considered as a material enlargement.

It is noted that the scheme includes an accessible WC, baby change and cleaner's store. It is not clear whether these are already present in the building. The public benefits of these are acknowledged. Accessible toilets are undoubtedly an important resource for our borough in making it more equitable by ensuring all our community members are able to enjoy our parks.

Notwithstanding this, it may be that the increase in scale results in this element being considered inappropriate development. Justification would need to be provided for the scale of the increase and concern is raised that the degree of change arises from the ambitious café proposals which are inappropriate.

3. A café (287sqm) with internal and external seating and a separate kiosk (16sqm)

From a review of the planning history, the existing café is understood to comprise some 169sqm floorspace in a simple timber clad building with modest ridge height of 3.85m. The information supplied suggest that it is 183sqm. The planning statement indicates this caters for 40 internally and 52 externally.

A café is an inappropriate use within MOL. The proposed increases in footprint, height and volume of the building are substantial and do not meet exception (c) or (d) of para 149. The harmful visual and spatial impact of the development on openness is further exacerbated by the proposed canopies to the external seating areas and likely further clutter associated with outdoor seating for a café use, noting the intention to accommodate over 120 covers externally. With this in mind, any application should include details of associated paraphernalia such as umbrellas to support the assessment in addition to the hours of operation for all uses associated with the proposal. The notion of a "destination café" in itself conflicts with MOL policy as any café should be ancillary of the use of the park and not a destination in itself.

It is noted from the meeting that applicants do not intend to erect urbanising influences such as advertisements. The outdoor furniture would not be fixed and would be put away at night. This should be outlined in any future submission.

From the follow-up letter, the applicant confirms that the building will be used as an ancillary facility for cyclists, walkers and general visitors and would not be utilised as a venue for hire. As above, operational hours and the intended uses should be clearly outlined.

4. A flexible community and education space, operated by The Royal Parks (55sqm)

This is not an appropriate use in MOL and does not meet any of the exceptions in para 149 or 150 of the NPPF. It is recommended that this is removed from the scheme.

Notwithstanding this conclusion, further details would need to be provided in any future application as to the use of the education/community spaces. Details would need to be provided of charges or fees for the public and community groups to use the space and how the applicant envisages that they would use the space. If it were possible to demonstrate Very Special Circumstances for this inappropriate development, a Community Use Agreement would need to be entered into to secure a genuine community component and the use of the café and community building would be restricted by condition to those proposed, preventing flexibility for change of use within Class E.

The footprint and height of the building at 7.15m represents a structure of significant size which will be widely visible, harm openness and conflict with the purposes of including land within the MOL. No justification is given for the height. Officers note the point within the follow-up letter stating the golf pavilion at Chohole Gate is in excess of 7.6m, however this application must be considered on its merits and in the context of an assessment on openness. In this case, there can be no doubt that the combined impact of the increased floorspace, volume and height of the development will result in both a spatial and visual loss of openness. A reduction in unnecessary height is strongly recommended to assist in reducing the scale of the harm.

Additional floorspace is indicated for circulation, plant and 'planning allowance' at 82sqm. This is not explained and adds to the assessment of inappropriateness above.

In any future submission, the increased scale of the development must be explained and justified. Para 5.2.5 of the Local Plan requires the submission of an assessment “that compares the footprint and floorspace of existing structures and buildings with the footprint and floorspace of the proposed development. This will enable the Council to make an informed judgement in relation to the overall impact on, and potential loss of, designated Green Belt or MOL. Any increase in either footprint or floorspace within designated Green Belt or MOL will need to be fully justified by the applicant.” There should be no features that are not essential.

Impact on openness does not just arise from floorspace. The visual impacts arising from the built volume, notably the increase in height, will also require justification. The presentation of layout options is noted and the reasoning given for the preferred choice although MOL policy must also be considered having regard to the impact on openness arising from of a more spread out development linked by covered external areas.

Amendments are proposed to the car parking area. The reduction in the number of spaces is welcomed from a MOL perspective, noting that appeal decisions have confirmed that increases in hardstanding and presence of cars can itself harm openness. The area of hard surfacing, existing and proposed, should be clarified in any future application.

It is stated that cycle parking will be provided including local cycle parking spaces. Clarity as to what development is proposed in this regard will be required as, for example, covered cycle parking may also impact on openness.

The landscaping scheme proposes natural play areas, swales and further tree, shrub, hedgerow and grassland. It is unclear as to whether the natural play features would require permission in themselves. From the meeting, Officer notes that provision of such would be minor. Should these be included within the planning application, details would need to be provided to establish the impact of these on ‘openness’ although it is acknowledged that from the discussion it would seem that these are likely to meet the exception set out at NPPF para 149 (b).

It is recognised that the existing buildings are poor quality and dispersed across the site. Whilst the principle of a consolidated replacement of improved quality, which achieves the ambition of a safer and more pleasant pedestrian and cycle friendly environment is supported, the scale of the development proposed is considered over ambitious, represents a significantly harmful incursion into MOL and constitutes inappropriate development.

The supporting statement indicates that the increased size of the scheme may be justified as they replace a larger café/clubhouse destroyed by fire in 2004. The LPA do not consider that any weight can be afforded to floorspace and building volume which has not existed on the site for over 15 years. It is further noted that the clubhouse has already been replaced at Chohole Gate in accordance with the Government’s Jenkins Report, granted planning permission under reference 10/3768/FUL and this floorspace would not be double-counted in justifying this proposal. The documents submitted with that application and Officers Report stated that the increase in development would be partly offset by the demolition of certain existing structures including the then existing approx. 390sqm clubhouse.

Overall, the proposed scheme does not meet any of the exceptions. It constitutes a new building which does not meet the test of being a facility for any of the uses cited as appropriate, and by virtue of its size it does have a harmful impact on the openness of MOL and conflicts with the purposes of including land within MOL. It causes substantial harm to MOL and should not be approved except in very special circumstances. This is considered further in the ‘The Case for Very Special Circumstances’ section of this report. It is also necessary to consider whether the proposal results in any other harm.

Land Use

There is policy support for the provision of community infrastructure at national, regional and local level for the many benefits it brings. In particular, Local Plan Policy LP 28 supports proposals for new or extensions to existing social and community infrastructure where it provides for an identified need. In order to support and assign weight to the benefits of the proposed social/community infrastructure the

issue of the identified need will need to be addressed in order to comply with LP 28. No information has been supplied within the pre-application submission to demonstrate this case.

Policy LP29 encourages provision of facilities and services for education and training to reduce inequalities and support the local economy. Further information is required on the type of education facilities to be provided in order to understand the value of the facilities and understand whether weight can be attached to this as a benefit and address LP 29.

Policy LP30 supports access to toilet facilities which are open to all in major developments where appropriate. London Plan policy S6 also supports toilets in large scale developments and supporting text states for smaller developments, the borough may secure access to toilet facilities as part of a community toilet scheme. As above, further information is required to ascertain the need for increased number of toilets. Should this be adequately justified with regard to MOL, further facilities may be appropriate.

Design and Impact upon Heritage Assets

Richmond Park is a designated Conservation Area and a Grade I listed Historic Park and Garden. The Conservation Area Statement notes that Richmond Park is of significant strategic as well as local importance as a distinct area of unique open space defined by its high 17th century listed boundary walls and historic associations. It continues: "The informal layout of planned woodland and residual open spaces flow together as a unified 'natural' landscape. This feel is accentuated by the natural topography of the park which is one of gentle undulations. Its superb mix of natural habitats and species make it of interest both nationally and internationally." It identifies a problem as being development pressure which may harm the balance of the landscape dominated setting, and the obstruction or spoiling of views, skylines and landmarks.

Officer notes that the supporting documentation refers to the potential for improved views from the café to the park with long views across the park through the breaks in the tree belt opposite. An Open Space Assessment will be required, including views from within the park towards the café, in order to assess the visual impact of the proposals.

As mentioned in previous sections, the scale and height of the proposed building is considered unacceptable with regard to its park setting and indeed its siting within MOL. The scale results in an over-dominant structure, which fails to relate to its ancillary use. Policy LP 2 guides applicants to refrain from using height to express and create local landmarks.

Aside from the scale and height issues which are considered to harm the balance of the landscape dominated setting, the overall approach to elevational treatment and design appears positive, with improvements proposed to car parking layout, pedestrian and cycle routes, landscape and additional planting proposed. The form of buildings proposed is quite organic, and materials as far as is proposed may be appropriate.

Coxwell gravel is proposed to the front of the main café building, which is considered acceptable considering its prevalence within Richmond Park. Whilst tarmac surfacing sounds somewhat urban for this park location, however Officer notes that more than one type of car park surfacing exists at Pembroke Lodge. Further justification for selected proposed hard surfacing should be outlined in any future application.

Archaeology

The application site is located within an Archaeological Priority Area with finds dating from prehistory and GLASS would be consulted on any formal application. Policy LP7 requires that desk-based assessments and, where necessary, archaeological field evaluation will be required before development proposals are determined, where development is proposed on sites of archaeological significance or potential significance. An Archaeological Statement will be a validation requirement.

Residential Amenity

The Alton School borders the site to the north and east. The nearest residential receptor appears to be the schoolkeepers bungalow at the Primary School and the Club House Flat at the Roehampton Gate Equestrian Centre. Allenford House lies to the east at some distance from the existing café.

It is noted from the meeting, that Roehampton Gate itself has a residence. As such, the location of such should be highlighted in any future scheme. Given the separation distance it is unlikely that the scheme would be considered harmful to amenity through visual intrusion or loss of light. Note however that the BREEAM states that a Noise Assessment is required given presence of noise sensitive locations within 800m of the site.

Transport

The applicant wishes to relocate the existing two-way shared space access to the existing car park approximately 120m north-west of the existing access to a point 80 south-east of Priory Lane's junction with Roehampton Gate. This is a semi-rural road with a speed limit of 30mph and is a public right of way maintained by Richmond Council as PROW160. Priory Lane has a speed limit of 20mph. Therefore, the applicant must be able to achieve vehicular visibility splays from the access of 2.4m x 25m in both directions. It is predicted that these can be achieved, however, these should be highlighted within any future scheme. The applicant should note any existing vegetation in this area also.

The current car park has 255 vehicular parking spaces. These are made up of 156 tarmac spaces, 59 unmarked spaces on gravel, and 40 informal overflow spaces. There are four disabled bays. The applicant proposes to reorganise the car park so that there are 231 vehicular parking spaces made up of 145 formal asphalt spaces, 48 unmarked spaces on gravel, and 38 informal overflow spaces. There would be 14 disabled bays, and these would be properly marked out in the formal hard surfaced area. There is no objection in principle to reducing the number of car parking spaces. However, it should be noted that the site has a public transport accessibility level of 0 and is not in a controlled parking zone. Therefore, the possible impact of overspill and unsafe parking on nearby roads must be considered. Policy T6.4 of the London Plan states that:

In locations of PTAL 0-3, schemes should be assessed on a case-by-case basis and provision should be consistent with the Healthy Streets Approach, mode share and active travel targets, and the aim to improve public transport reliability and reduce congestion and traffic levels

Therefore, to assess the likely impact of the net reduction in vehicular parking the LPA will need to see existing car park utilisation surveys carried out when the car park is operational. If existing utilisation can be accommodated safely in the new layout, there would be no objection to the changes.

The applicant should also have regard to Table 10.6 of the London Plan on non-residential disabled vehicular parking, stating that 6% and 4% of total parking provision should be allocated to designated bays and enlarged bays respectively.

The applicant's intention to provide a net increase of 46 short-stay cycle parking spaces is supported.

A construction and demolition management and logistics plan needs to be included. Please see the link below for more guidance: <http://content.tfl.gov.uk/construction-logistics-plan-guidance.pdf>

Electric charging points are proposed to be included for 2 catering vehicle spaces. Consideration should be given to providing further active and passive electric vehicle charging spaces as per the Local Plan policy LP45, which requires provision of electric vehicle charging points, where applicable. Indeed, the Transport SPD (2020) 10.1 states that developers should demonstrate that the development would be able to operate satisfactorily in the future expectation of all vehicles being electrically powered. Section T.6 of the London Plan 2021 states that *operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles, including active charging points for all taxi spaces*. As such, the position for electric charging points is clear and should be provided within a scheme of this type.

With regard to the pedestrian link to the Alton Estate, further details on such access should be provided in a future application. A Transport Statement will be necessary. A Travel Plan statement is required for scheme that will employ 20 or more staff.

Trees

The proposal requires construction within and adjacent to the rooting area of existing trees. It is necessary to identify trees that will be affected by development and satisfy the Local Planning Authority that retained trees will not be damaged during demolition or construction. This is to ensure development protects, respects, contributes to, and enhances trees and landscapes, in accordance with LBR Local Plan (LBRLP) 5.5, Policy LP16, subsection 5 and pursuant to section 197 of the Town and Country Planning Act 1990.

LBRuT Local Plan, policy LP16, subsection 5. Requires "That trees are adequately protected throughout the course of development, in accordance with British Standard 5837 - Trees in relation to design, demolition and construction, Recommendations (2012)."

The area around nearby trees must be suitably protected from both direct and any indirect construction activity, and not used for the storage of any materials and/or machinery (Including the positioning and working arcs of any cranes, where applicable) and identify and take account of any ingress and egress routes.

It is also important that the loss of tree cover is minimised, wherever possible. However, any tree loss must be mitigated with replacement planting commensurate with the value of lost trees. Any on-site tree planting specification and methodology must include soil volume calculations and incorporating root deflection measures (where necessary) and incorporate a design, methodology and philosophy according to best industry practice in line with British Standards and documentation published by the Tree Design And Action Group (TDAG).

In instances where car parking provision will change near existing trees, it is recommended that a "No-dig" solution is employed within using a cellular confinement design and construction method with a granular substrate to minimise impact on tree roots.

The London Borough of Richmond upon Thames (LBRuT) Local Plan (2018) Policy LP16 Trees, Woodlands and Landscape stipulates:

"A. The Council will require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits.

B. To ensure development protects, respects, contributes to and enhances trees and landscapes."

The full application must account for and adhere to the aforementioned policy. Consequently, it is recommended the following be undertaken and submitted to the LPA for approval, as a minimum as part of a full application:

1. A "Tree Survey" is necessary to include all trees present on or adjacent to a development site as specified 4.4, BS5837:2012 'Trees in relation to design, demolition and construction - recommendations (2012). The tree survey is to pay specific attention to the Root Protection Area (RPA) of each tree in relation to the proposed development (for the avoidance of doubt, this must include all trees present on or adjacent to the development site).

2. Any trees identified as a constraint on development in the "Tree Survey" or that could be impacted by construction activities, must then inform an "Arboricultural Impact Assessment" (AIA). This must incorporate a "Tree Constraints Plan" (TCP) that evaluates the direct and indirect effects of the proposed design on impacted trees and where necessary recommends mitigation or where redesign and/or repositioning of the proposed development is needed (As specified in section 5.4, BS5837:2012.). This is to include the impact of any supporting structures such as scaffolding or hoardings may have on trees both within and outside the project boundary.

3. Based on the findings of the AIA, a scheme for the protection of the retained trees, in accordance with and addressing sections 5.5, 6.1, 6.2, 6.3 and 7 of BS 5837:2012, including a "Tree

Protection Plan(s)" (TPP) and an "Arboricultural Method Statement" (AMS), shall be submitted to and approved in writing by the Local Planning Authority. (NB. All RPA's calculations must be adjusted to account for nearby constraints and obstructions)

The following industry standards should be referred to:

- BS:3998 (2010) Tree work - Recommendations
- BS:5837 (2012) Trees in relation to demolition, design and construction - Recommendations
- NHBC Chapter 4.2 (2021): Building near trees
- Tree Design And Action Group (TDAG): Trees, Planning and Development: A Guide for Delivery

Given the changes to the site it is important to provide ecological, environmental and bio-diversity benefits and to maximise the quality and usability of open spaces and green infrastructure within the development. As stated in the LBRuT Local Plan LP16;

"Landscape design must form an integral part of any proposal and needs to be considered in relation to the development, as a whole, at the start of a project. Landscape design and where appropriate tree planting as well as other green infrastructure elements such as green roofs and green walls, will also need to contribute to and complement the existing character of an area."

In reference to the above and in order to safeguard and enhance the character and amenity of the area a detailed "Hard and Soft Landscaping Plan" should be submitted in accordance with the requirements of the local plan.

Biodiversity and Habitat Regulation Assessment

As identified in Section 11 of the pre-application design report, an Extended Phase 1 Habitat Survey will be required, and the Council's Ecologist concurs with the survey work proposed. Note that if the Extended Phase 1 Habitat survey does identify the need for any further species surveys, these will need to be undertaken prior to the submission of the planning application as they are a validation requirement.

In terms of the Habitat Regulations Assessment (HRA) the site is designated as a Special Area of Conservation for 1083 Stag beetle *Lucanus cervus*. Richmond Park has a large number of ancient trees with decaying timber and is therefore the centre of distribution for the stag beetle. The site is also a site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees. In order to assist the Council in assessing a need for an HRA, it would be useful if the Ecological Impact Assessment considers whether suitable veteran trees or decaying wood habitat are found within or immediately adjacent to the red line.

In addition to the above, any application should be accompanied by a landscaping scheme. The Council will review this having regard to the use of native species, wildlife enhancements and biodiversity net gain. London Plan policy G6 states that development proposals should "aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process". Final details, including maintenance of the landscaping, can be secured by condition but the application will benefit from details up front.

Proposals for external lighting should be specified, to include locations, specifications and horizontal lux contour plans. It is recommended that the wildlife enhancements include bat and bird boxes in the form of bat bricks included within the design of the build. Details should include specifications, locations, positions, aspects and heights although final details can be conditioned.

Policy LP17 seeks the use of green roofs or green walls where a green roof cannot be incorporated. Any application should explain the consideration given to green roofs/walls and where proposed, include a specification, details of species and proposed maintenance. Following the meeting, the Ecology Officer has provided additional advice on green roof specifications. You are advised not to pursue greater than 20% native sedum species. The Buglife Green Roof Guidance provides guidance [Creating-Green-Roofs-for-Invertebrates Best-practice-guidance.pdf \(buglife.org.uk\)](https://www.buglife.org.uk/creating-green-roofs-for-invertebrates-best-practice-guidance.pdf)

Flooding and Sustainable Drainage

In accordance to policy LP21 of the Local Plan (2018), all developments should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere. Development will be guided to areas of lower risk by applying the 'Sequential Test' as set out in national policy guidance, and where necessary, the 'Exception Test' will be applied.

*Furthermore LP 21 of the Local Plan (2018) (and expanded on in paragraph 6.2.21) states that all new development will be required to incorporate Sustainable Drainage Systems (SuDS) and that applicants will have to demonstrate that proposals comply with the following:
A reduction in surface water discharge to greenfield run-off rates wherever feasible
Where greenfield run-off rates are not feasible, this will need to be demonstrated by the applicant, and in such instances, the minimum requirement is to achieve at least 50% attenuation of the site's surface water run-off at peak times based on the levels existing prior to development.*

The Councils SFRA (2021) identifies areas within the site as being at risk of surface water flooding (1 in 30 chance) and a greater area at being at identified but lesser risk (1 in 100 chance and 1 in 1000 chance). It also identifies the area as being susceptible to groundwater flooding (between 25% and 49.9%) with potential for groundwater flooding to occur at surface. A Site-Specific Flood Risk assessment will be required in addition to a Statement on Sustainable Drainage Systems.

The SUDS statement will need to address the drainage hierarchy in the London Plan in detail. At present, the application does not confirm compliance with the hierarchy of drainage set out in the London Plan Policy SI 13. Further information is required regarding the use of rainwater harvesting features such as water butts and infiltration testing will be necessary prior to the determination of any planning application to determine feasibility to infiltrate in order to comply with the London Plan Drainage Hierarchy. The Lead Local Flooding Authority (LLFA) have further requested that consent for the proposed discharge point connection is provided.

Policy LP17 encourages green/brown roofs and green walls for their many benefits including sustainable drainage. The submitted design report notes that consideration should be given to such features and extensive green roofs are proposed on the flat roofs over the back of house areas.

The applicant proposes to manage rainwater via the use of permeable paving spaces with asphalt aisles. The proposed runoff rate for the 1 in 100-year plus climate change allowance is stated to be 19.7 l/s. The SuDS will discharge to a local surface water sewer and then into the Beverley Brook watercourse.

The LLFA assessment results are as follows:

- The applicant should state the Total Site Area and confirm within this the existing impermeable area and proposed impermeable area.
- The applicant should undertake a Ground Investigation to determine whether infiltration at this site is feasible.
- The applicant should provide a topographic site survey.
- The applicant should provide a SuDS Proforma with updated detailed drainage drawings (should anything change)
- The existing (brownfield) run-off rate should be supplied
- Calculations to support the runoff rates should be supplied

Sustainability

Policy LP 20 of the Local Plan (2018) encourages development proposals to be fully resilient to the future impacts of climate change which can be done through careful design of its layout, design, construction, materials, landscaping.

Policy LP22 of the Local Plan (2018) requires new non-residential development over 100sqm to meet BREEAM 'Excellent' Standard and developments to achieve the highest standards of sustainable design and construction in order to mitigate against climate change.

Officer notes the submitted BREEAM pre-assessment targeting 'excellent' and the proposed photovoltaic panels on the pitched roofs. The following would be required to be demonstrated through any future application:

- Any new non-residential development over 100sqm must achieve BREEAM 'Excellent' standards.
- A completed Sustainable Construction Checklist (http://www.richmond.gov.uk/sustainable_construction_checklist)
- Energy Report demonstrating that the scheme achieves a 35% carbon emissions reduction target beyond Part L 2013 of the Building Regulations

Waste

The applicant is advised to provide suitable waste storage for a weekly collection, to minimise waste vehicle movements in/out of the park and have a lesser impact on local air quality and traffic conditions.

BS5906:2005 (Code of practise for waste management in buildings) doesn't specify a metric for calculating waste arisings from cafes, however the metric for restaurants could be used as a worst case scenario, which is 75L storage capacity per cover per week.

The LPA would also require storage of suitable waste streams for recycling.

Fire Safety

[London Plan policy D12](#) requires the submission of a Fire Safety Statement on all planning applications. The Fire Safety Statement should be presented as a standalone document with a clear structure that addresses the criteria set out in London Plan Policy D12 part A. The submitted drawings should address the requirements set out at paragraphs 3.12.3 and 3.12.4 of the London Plan. Where the applicant considers parts of or the whole policy do not apply, this should be justified in a Reasonable Exception Statement (RES). Draft guidance on Fire Safety Statements is available at:

<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/draft-fire-safety-guidance-pre-consultation-information>

CIL

Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a local finance consideration as far as it is material. The weight to be attached to a local finance consideration remains a matter for the decision maker. The Mayor of London's CIL and Richmond CIL are therefore material considerations.

On initial assessment this development is considered liable for the Mayoral or Richmond CIL however this is subject to confirmation by the CIL Administration Team.

The case for Very Special Circumstances

The proposal is inappropriate development in designated Metropolitan Open Land. Paragraph 143 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and such development should not be approved except in Very Special Circumstances (VSC). Paragraph 144 of the NPPF states that Very Special Circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

The Courts have not defined 'very special', beyond confirming that the words must be given their ordinary and natural meaning as contained in *R(Chelmsford BC) v First Secretary of State* [2004] EWHC 2978 (Admin):

'The words 'very special' must be given their ordinary and natural meaning. Since the expression 'very special' is so familiar, any attempt at definition is probably superfluous, but for what it is worth, the Shorter Oxford English Dictionary tells us that special means:

Of such a kind as to exceed or excel in some way that which is usual or common; exceptional in character, quality or degree. The circumstances must not be merely special in the sense of unusual or exceptional, but very special'.

The decision-taker must exercise a qualitative judgment and ask whether the circumstances, taken together, are very special and explain that reasoning.

The National Planning Policy Framework confirms that harm to the Green Belt should be afforded substantial weight. The substantial increase in built volume on the site, principally from the café and community/education building causes harm from inappropriateness, the significant reduction in openness, and conflict with the five Green Belt purposes. This amounts to substantial weight against the proposal.

A Court of Appeal judgment (Redhill Aerodrome) has confirmed that the interpretation given to any other harm in what is now paragraph 144 of the Framework is such that it is not restricted to harm to the Green Belt. At this stage it is not possible to confirm whether any other harm arises and the amount of weight to be afforded to that harm other than the great weight to be afforded to the less than substantial harm to heritage assets, but the Councils requirements are noted above.

The onus is on the applicant to demonstrate a case for VSC. It is strongly recommended that any future application be accompanied by a standalone VSC statement.

The submitted information describes the development as vital as the existing buildings were only intended to be temporary. Whilst the replacement of the existing floorspace and building volume may be justified under MOL policy, no justification has been provided for the significant increase in built form proposed.

There are numerous concession outlets in the park already and there is Pembroke Lodge, which is an existing wedding venue and café. Education space is also available in Pembroke Lodge. The submitted documents states that the space is not intended to compete with Holly Lodge but complement it. No explanation is given for why further education/community space is required and why it is necessary to be provided within MOL. The need for this substantial increase and the additional uses provided by it are not justified within the pre-application submission. Catering demand is not considered to be suitable justification for the departure against policy.

The benefits that accrue from the revised access and parking layout, and pedestrian access to the Alton Estate do not appear to be dependent on the substantial increase in scale of the development proposed.

Whilst the benefits of the scheme are acknowledged and welcomed, the harm by reason of inappropriateness, and the other harm resulting from the proposal, is not *clearly* outweighed by the other considerations. Consequently, very special circumstances do not exist and the Framework and other policies direct that planning permission should be refused.

Other Matters

Given the sensitivity of the location it is suggested that consideration be given to approaching both Historic England and Natural England for pre-application advice, both of whom would be a statutory consultee on the planning application.

Early community consultation may be advisable prior to any future submission.

Validation Checklist

Applicants are advised to refer to the national list of requirements and the Council's Local Validation Checklist before submitting a full application - http://www.richmond.gov.uk/home/services/planning/make_a_planning_application.htm

Without prejudice

Any given advice by Council Officers from pre-application enquiries does not constitute a formal response or decision of the Council with regard to future planning consents. Any views or opinions expressed are given in good faith and to the best of ability without prejudice to formal consideration of any planning application, which was subject to public consultation and ultimately decided by the Council. You should therefore be aware that officers cannot give guarantees about the final form or decision that will be made on your planning or related applications.

Although the advice note will be brought to the attention of the Planning Committee or an officer acting under delegated powers, it cannot be guaranteed that it will be followed in the determination of future related planning applications and in any event circumstances may change or come to light that could alter the position. It should be noted that if there has been a material change in circumstances or new information has come to light after the date of the advice being issued then less weight may be given to the content of the Council's pre-application advice of schemes. You are also advised to refer to local and national validation checklist on the Council's website.

In the meanwhile should you have any further concerns or enquiries please do not hesitate in contacting me.

Yours sincerely



Nicki Dale

Team Manager – South Area

Development Management

London Borough of Richmond Upon Thames

Appendix C Link Count Data



ADVANCED
TRANSPORT
RESEARCH

Job Number & Name: 30418 Roehampton Café

Site Number/Name: Roehampton Café

Client: Stantec

Date: 8th to 10th April 2022

Advanced Transport Research

Roehampton Café

Job Number & Name: 30418 Roehampton Café

Date: 8th to 10th April 2022

Job Type:

Link Count

Co-ordinates:

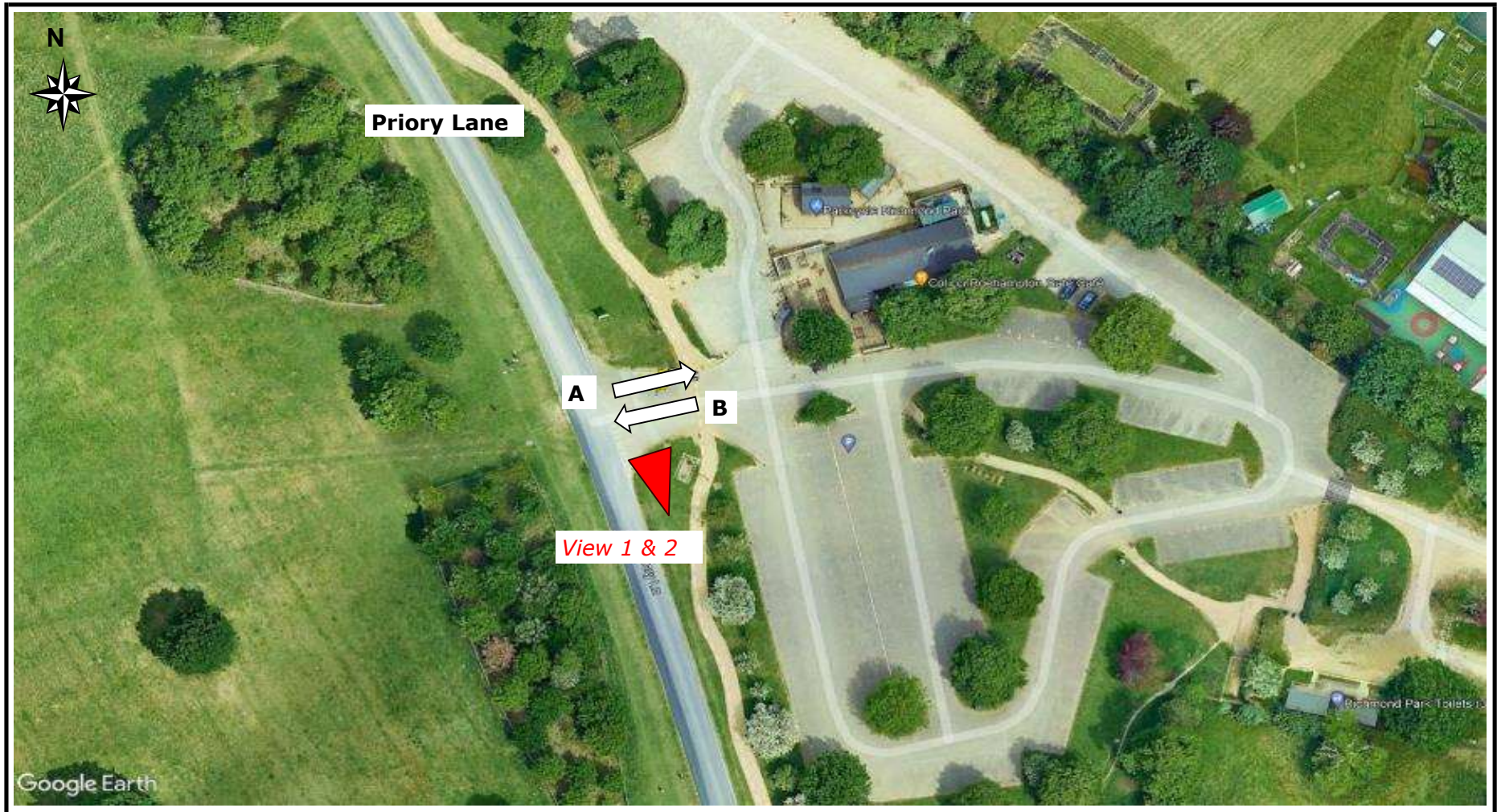
51°27'9.27"N, 0°15'20.98"W

Postcode:

SW15 5JP

Times:

0700-1900



Times	Movement A								Movement B							
	Car	LGV	OGV1	OGV2	PSV	M/B	Cyc	E Scooter	Car	LGV	OGV1	OGV2	PSV	M/B	Cyc	E Scooter
07:00 - 07:15	7	0	0	0	0	0	1	0	2	0	0	0	0	0	2	0
07:15 - 07:30	4	0	1	0	0	0	2	0	1	0	0	0	0	0	0	0
07:30 - 07:45	4	0	0	0	0	0	1	0	0	1	0	0	0	0	2	0
07:45 - 08:00	3	1	0	0	0	0	3	0	1	0	1	0	0	0	3	0
08:00 - 08:15	9	0	0	0	0	0	1	0	3	1	0	0	0	0	0	0
08:15 - 08:30	5	0	0	0	0	0	9	0	4	0	0	0	0	0	2	0
08:30 - 08:45	3	0	0	0	0	0	7	0	3	0	0	0	0	0	8	0
08:45 - 09:00	8	0	0	0	0	0	4	0	4	0	0	0	0	0	4	0
09:00 - 09:15	3	1	0	0	0	0	5	0	5	1	0	0	0	0	11	0
09:15 - 09:30	12	0	0	0	0	0	3	0	2	0	0	0	0	0	2	0
09:30 - 09:45	7	0	0	0	0	0	6	0	5	0	0	0	0	0	6	0
09:45 - 10:00	12	0	0	0	0	0	4	0	8	0	0	0	0	0	6	0
10:00 - 10:15	13	1	0	0	0	0	5	0	4	1	0	0	0	0	5	0
10:15 - 10:30	11	0	0	0	0	0	2	0	10	0	0	0	0	0	6	0
10:30 - 10:45	8	2	0	0	0	0	1	0	7	1	0	0	0	0	0	0
10:45 - 11:00	14	0	0	0	0	0	7	0	9	0	0	0	0	0	3	0
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13:45 - 14:00	6	0	0	0	0	0	4	0	11	0	1	0	0	0	1	0
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14:45 - 15:00	8	0	0	0	0	0	4	0	10	0	0	0	0	0	3	0
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18:45 - 19:00	4	0	0	0	0	0	0	0	4	0	0	0	0	0	1	0

Times	Movement A								Movement B							
	Car	LGV	OGV1	OGV2	PSV	M/B	Cyc	E Scooter	Car	LGV	OGV1	OGV2	PSV	M/B	Cyc	E Scooter
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07:15 - 07:30	3	1	0	0	0	0	21	0	1	1	0	0	0	0	8	0
07:30 - 07:45	4	0	0	0	0	0	12	0	1	1	0	0	0	0	14	0
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18:00 - 18:15	5	0	0	0	0	0	4	0	19	0	0	0	0	0	1	0
18:15 - 18:30	3	0	0	0	0	0	3	0	7	0	0	0	0	0	7	0
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18:45 - 19:00	0	0	0	0	0	0	1	0	7	0	0	0	0	0	1	0

Times	Movement A								Movement B							
	Car	LGV	OGV1	OGV2	PSV	M/B	Cyc	E Scooter	Car	LGV	OGV1	OGV2	PSV	M/B	Cyc	E Scooter
07:00 - 07:15	2	0	0	0	0	0	7	0	0	0	0	0	0	0	10	0
07:15 - 07:30	5	0	0	0	0	0	2	0	1	1	0	0	0	0	2	0
07:30 - 07:45	9	0	0	0	0	0	7	0	0	0	0	0	0	0	5	0
07:45 - 08:00	14	0	0	0	0	0	20	0	0	0	0	0	0	0	3	0
08:00 - 08:15	10	0	0	0	0	0	5	0	1	0	0	0	0	0	26	0
08:15 - 08:30	12	2	0	0	0	0	27	0	1	0	0	0	0	0	17	0
08:30 - 08:45	16	0	0	0	0	0	25	0	5	1	0	0	0	0	17	0
08:45 - 09:00	17	0	0	0	0	0	49	0	6	0	0	0	0	0	23	0
09:00 - 09:15	22	0	0	0	0	1	45	0	8	1	0	0	0	0	25	0
09:15 - 09:30	16	1	0	0	0	0	24	0	3	1	0	0	0	0	50	0
09:30 - 09:45	29	0	0	0	0	0	50	0	9	0	0	0	0	0	40	0
09:45 - 10:00	29	0	0	0	0	0	71	0	23	0	0	0	0	0	39	0
10:00 - 10:15	31	0	0	0	0	0	38	0	15	0	0	0	0	0	59	0
10:15 - 10:30	25	1	0	0	0	1	62	0	11	0	0	0	0	0	53	0
10:30 - 10:45	21	0	0	0	0	0	39	0	13	0	0	0	0	1	54	0
10:45 - 11:00	20	0	0	0	0	0	55	0	18	0	0	0	0	0	44	0
11:00 - 11:15	23	0	0	0	0	0	68	0	22	0	0	0	0	0	53	0
11:15 - 11:30	20	1	0	0	0	0	47	0	38	1	0	0	0	0	37	0
11:30 - 11:45	33	0	0	0	0	0	53	0	24	0	0	0	0	0	46	0
11:45 - 12:00	28	0	0	0	0	0	46	0	29	0	0	0	0	1	37	0
12:00 - 12:15	28	0	0	0	0	0	52	0	36	0	0	0	0	0	53	0
12:15 - 12:30	24	0	0	0	0	2	20	0	25	0	0	0	0	0	33	0
12:30 - 12:45	21	1	0	0	0	0	39	0	10	0	0	0	0	0	20	0
12:45 - 13:00	29	0	1	0	0	0	31	0	26	1	1	0	0	1	32	0
13:00 - 13:15	29	0	0	0	0	1	25	0	25	0	0	0	0	0	25	0
13:15 - 13:30	28	0	0	0	0	0	34	0	23	0	0	0	0	0	21	0
13:30 - 13:45	30	0	0	0	0	0	19	0	16	0	0	0	0	0	32	0
13:45 - 14:00	25	1	0	0	0	0	42	0	27	1	0	0	0	0	25	0
14:00 - 14:15	19	0	0	0	0	0	23	0	32	2	0	0	0	1	25	0
14:15 - 14:30	14	0	0	0	0	0	21	0	16	0	0	0	0	0	12	0
14:30 - 14:45	17	0	0	0	0	1	21	0	29	0	0	0	0	0	27	0
14:45 - 15:00	22	0	0	0	0	0	11	0	33	0	0	0	0	0	19	0
15:00 - 15:15	22	0	0	0	0	1	14	0	28	0	0	0	0	0	11	0
15:15 - 15:30	22	0	0	0	0	0	16	0	32	0	0	0	0	1	11	0
15:30 - 15:45	17	0	0	0	0	0	14	0	21	0	0	0	0	0	7	0
15:45 - 16:00	15	0	0	0	0	0	12	0	32	0	0	0	0	1	15	0
16:00 - 16:15	11	0	0	0	0	0	9	0	23	0	0	0	0	0	9	0
16:15 - 16:30	11	1	0	0	0	0	7	0	13	0	0	0	0	0	10	0
16:30 - 16:45	11	0	0	0	0	0	14	0	22	1	0	0	0	0	13	0
16:45 - 17:00	11	0	0	0	0	1	6	0	18	0	0	0	0	1	11	0
17:00 - 17:15	9	0	0	0	0	3	14	0	18	0	0	0	0	0	6	0
17:15 - 17:30	7	0	0	0	0	0	9	0	18	0	0	0	0	0	12	0
17:30 - 17:45	6	1	0	0	0	0	0	0	23	0	0	0	0	3	6	0
17:45 - 18:00	5	1	0	0	0	0	2	0	15	0	0	0	0	1	1	0
18:00 - 18:15	1	0	0	0	0	0	2	0	11	0	0	0	0	0	6	1
18:15 - 18:30	3	0	0	0	0	0	2	0	4	0	0	0	0	0	2	0
18:30 - 18:45	4	0	0	0	0	0	0	0	6	0	0	0	0	0	0	0
18:45 - 19:00	0	0	0	0	0	3	2	0	6	0	0	0	0	0	2	0

Appendix D Technical Drawings



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PO2	REVISED CENTRAL CROSSING DESIGN	BS	JH	2024.06.19
PO1	FIRST ISSUE	BS	JH	2024.04.19
Issued/Revision		By	Appd	YYYY.MM.DD
		BS	JH	2024.06.19
		Dwn.	Dsgn.	Chkd.
				YYYY.MM.DD

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Title
SITE ACCESS ARRANGEMENT OPTION 3

Project No.	A2 Scale
332110545	1:500
Revision	Drawing No.
P02	RHC-STN-XX-XX-DR-TR-0108

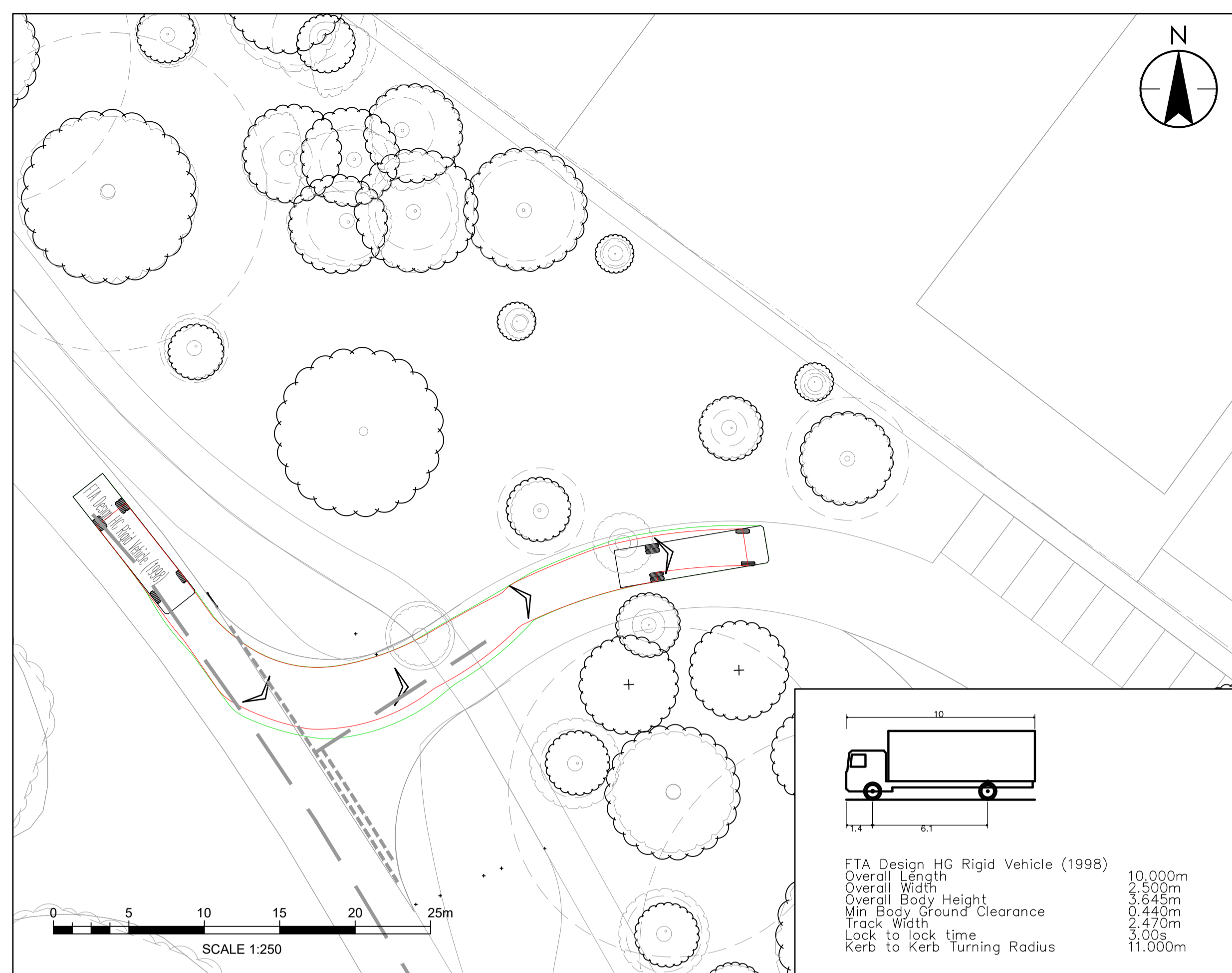


Plotted: 20.06.2024 06:20 9:19:35 AM By: House, Joe
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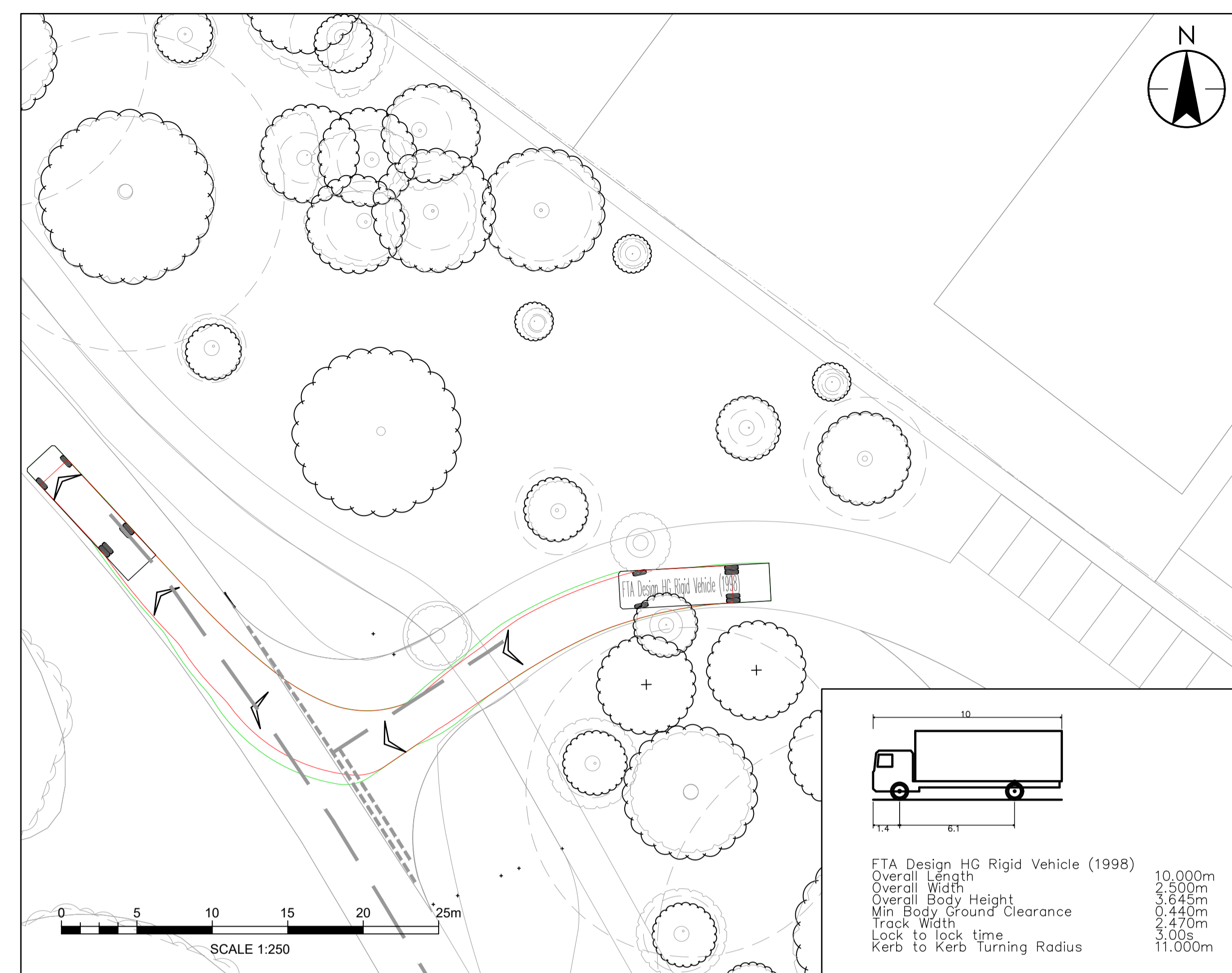
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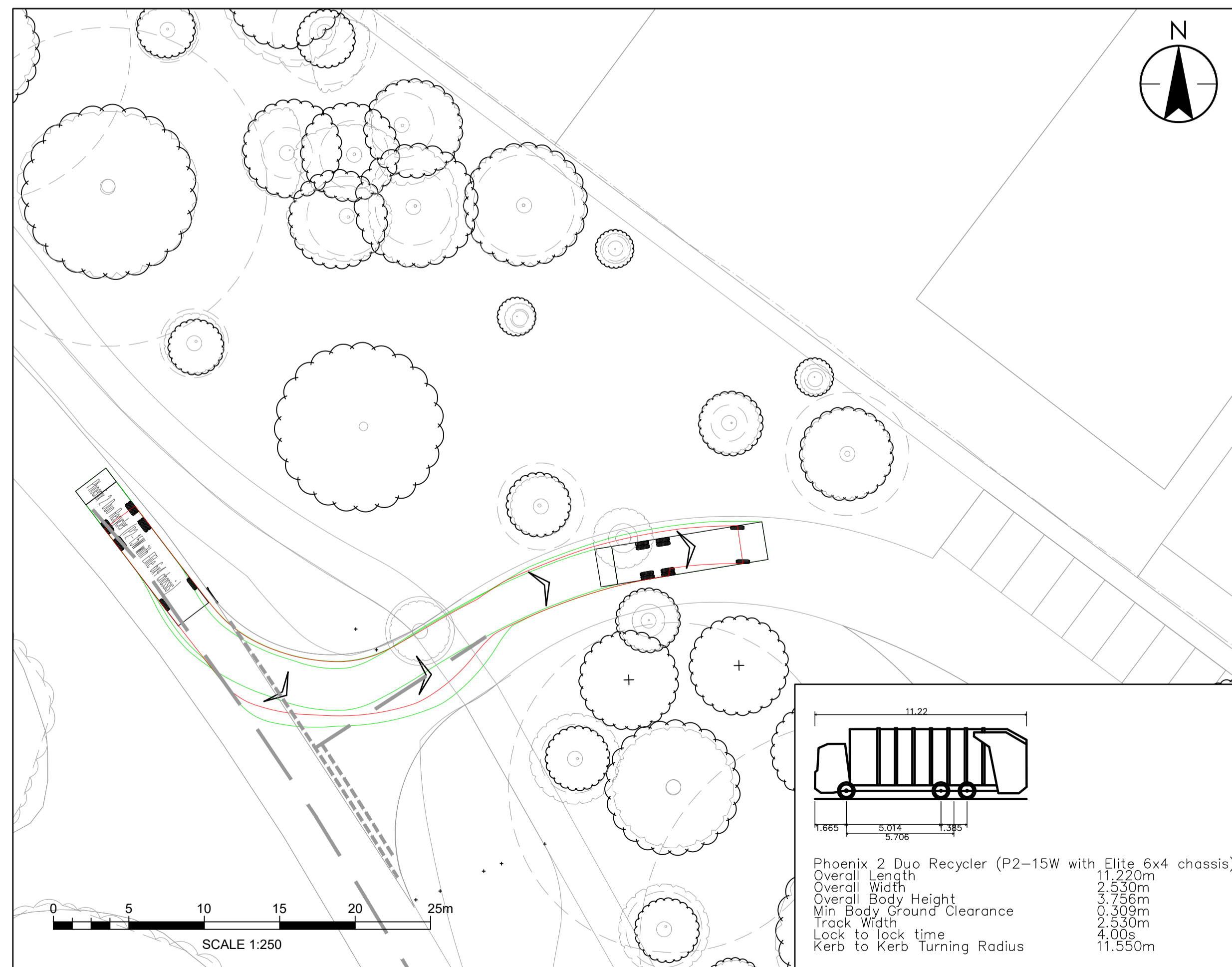
Notes
 UTILITIES NOTE: The position of any existing public or private sewers, utility services,
 plant or apparatus shown on this drawing is believed to be correct, but no warranty to this
 is expressed or implied. Other such plant or apparatus may also be present but not
 shown. The Contractor is therefore advised to undertake their own investigation where the
 presence of any existing sewers, services, plant or apparatus may affect their operations.



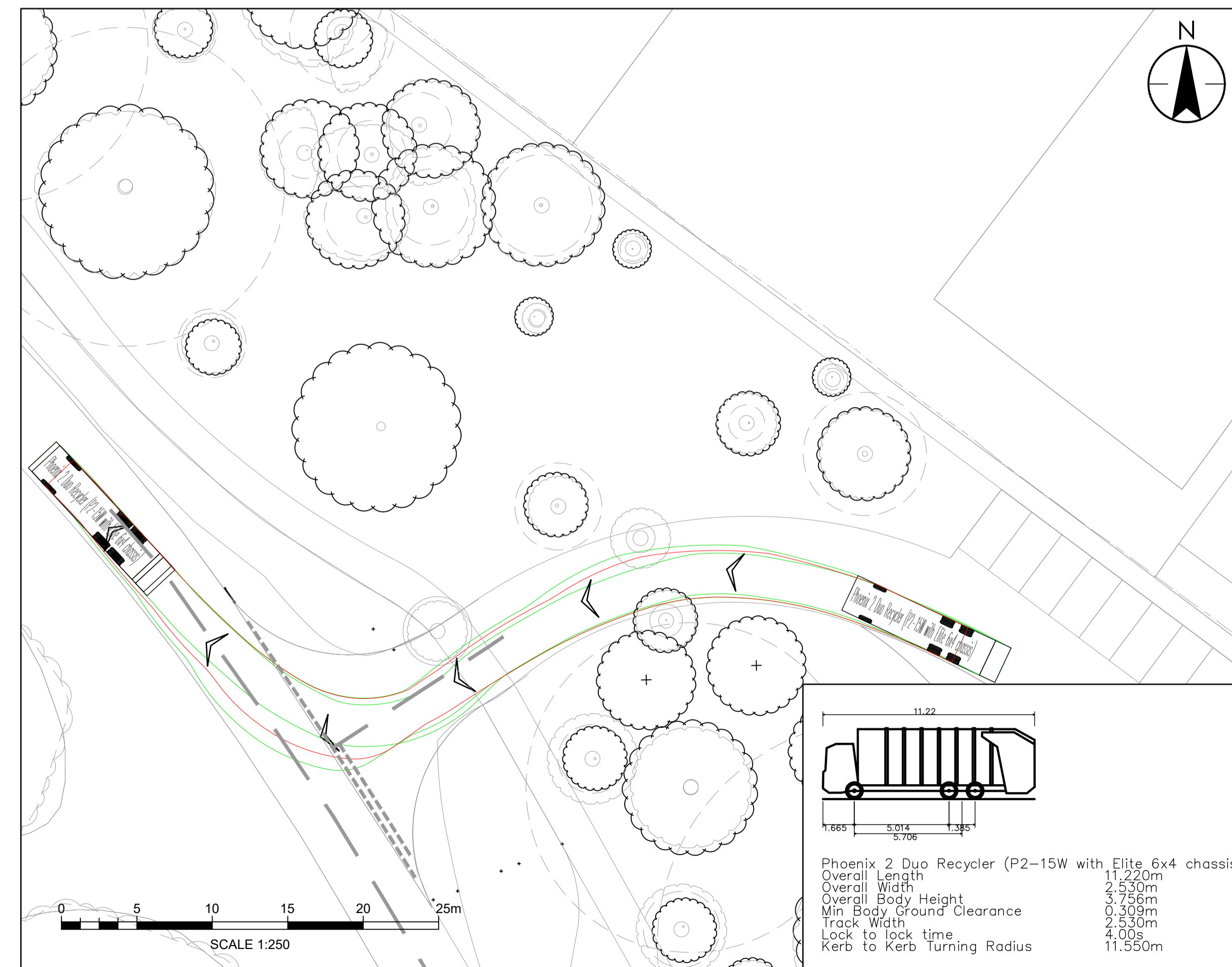
INBOUND SWEEP PATH
10m RIGID VEHICLE



OUTBOUND SWEEP PATH
10m RIGID VEHICLE



INBOUND SWEEP PATH
LARGE REFUSE VEHICLE



OUTBOUND SWEEP PATH
LARGE REFUSE VEHICLE

Issue/Revision	By	Appd	Date
P02_UPDATED MASTERPLAN	MHL	ML	2024.07.19
P01_FIRST ISSUE	BS	ML	2024.04.28
Issue/Revision			YYYY.MM.DD
	BS	ML	2024.07.19
	Dwn.	Dsgn.	Chkd.
			YYYY.MM.DD

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Title
PROPOSED SITE ACCESS
VEHICLE SWEEP PATH ANALYSIS

Project No.	Scale
332110545	1:250
Revision	Drawing No.
P02	RHC-STM-XX-DR-TR-0112