64 THE GREEN, TWICKENHAM
TRANSPORT STATEMENT
September 2024

SANDS
CIVIL ENGINEERING CONSULTANCY LTD

UNIT 23 THE IO CENTRE, 1 ARMSTRONG ROAD,
LONDON SE18 6RS

T: 02045394527 | E: contact@sandsec.co.uk
www.sandsec.co.uk

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1 Introduction

1.1 Background

1.1.1 SANDS Civil Engineering Consultancy Ltd has been instructed to prepare a Transport Statement (TS) in respect of a proposed development at 64 The Green, Twickenham. The development comprises provision of 5 dwellings – 4 new dwellings and retention of one existing dwelling.

1.1.2 This TS considers all relevant transport arrangements for the proposed development and its implications for the local highway and public transport networks. Additionally, the TS assesses the development against all relevant local, regional, and national transport and planning policies.

1.1.3 In preparing this TS, guidance on Transport Statement/Assessments, published by the Department for Transport has been consulted. It should be noted that the thresholds for when a TA or TS is required were set in Guidance on Transport Assessments, DfT, 2007. This document has now been withdrawn by the government, as it is considered more appropriate to determine thresholds which reflect the transport context and circumstances in local areas. Nevertheless, in practice, the previous nationally defined thresholds continue to be applied as 'rule of thumb' in the absence of more locally defined thresholds.

1.1.4 The indicative thresholds for when a TA or TS are required are set out in the 2007 DfT guidance on Transport Assessments. The threshold for when a TA is required for residential development (use class C3) is >80 residential units. The threshold for a TS is >30 and <80 residential units (C3). According to the DfT guidance above, an assessment is not required for developments (C3) of less than 30 units. However, these are not absolute thresholds, and the requirements will depend on the transport considerations specific to each.

1.1.5 In regard to the subject development, a TS is deemed appropriate due to its modest scale and nature. A development of the scale and nature proposed is not expected to generate the level of demand on the network that requires a detailed transport impact assessment and include local or strategic transport modelling to assess its impacts on the network. Nevertheless, it is appreciated that there might be concerns regarding potential impacts on the local transport network, parking in the surrounding streets, access to the development and questions about how any potential adverse impacts could be mitigated.

1.1.6 This document ensures that all relevant transport matters are given due consideration and are fairly represented in deliberations on this planning application.

1.2 Structure of the Report

1.2.1 The report provides details of the traffic and transportation issues associated with the proposed development and is structure as below:

- Chapter 1 – Introduction
- Chapter 2 – Policy Considerations
- Chapter 3 – Existing Development and Context
- Chapter 4 – Accessibility
- Chapter 5 - Development Proposal
- Chapter 6 - Trip Generation and Impacts
- Chapter 7 - Summary and Conclusions

2 Policy Considerations

2.1 Background

2.1.1 This section of the Transport Statement sets out the relevant transport policies, including national policies contained in the National Planning Policy Framework (NPPF) 2023, strategic policies set out by the Greater London Authority (GLA) and the local policies set by Richmond Council.

2.2 National Planning Policy Framework (NPPF) 2023

2.2.1 The NPPF 2023 sets out national planning policy, provides a framework within which local planning policies should be produced, and is a material consideration in planning decisions.

2.2.2 Paragraph 111 writes:

2.2.3 If setting local parking standards for residential and non-residential development, policies should take into account:

- the accessibility of the development.
- the type, mix and use of development.
- the availability of and opportunities for public transport; d) local car ownership levels; and
- the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

2.2.4 With regards to transport NPPF 2023 Paragraph 115 provides that:

2.2.5 "Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

2.2.6 Paragraph 116 further provides that applications for developments should:

- Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use.
- Address the needs of people with disabilities and reduced mobility in relation to all modes of transport.
- Create places that are safe, secure, and attractive – which minimise the scope for conflicts between pedestrians, cyclists, and vehicles, avoid

unnecessary street clutter, and respond to local character and design standards.

- Allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- Be designed to enable charging of plug-in and ultra-low emission vehicles in safe, accessible, and convenient locations.

2.2.7 Paragraph 117 states that: "All developments that will generate significant amounts of movement should be required to provide a travel plan and should be supported by a transport statement or transport assessment."

2.3 The London Plan 2021

2.3.1 The London Plan was published in March 2021 and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.

2.3.2 The London Plan provides that the development proposals should support sustainable travel through the inclusion of appropriate cycle parking facilities and high-quality pedestrian environments and provides recommended maximum car parking standards for various land uses.

2.3.3 The transport policies are set out at Chapter 10 of London Plan. Policy T1 sets the overarching approach to transport for the city. Policy T1 states that Development Plans and development proposals should support the delivery of the mayor's ambitious strategic target of 80 per cent of all trips in London to be made by foot, cycle, or public transport by 2041. The strategic transport schemes for London during the plan period are set out in Table 10.1 of the London Plan.

2.3.4 The London Plan (Policy T2) promotes the concept of 'Healthy Streets', which is defined by the following 10 indicators:

- Pedestrians from all walks of life.
- Easy to cross.
- Shade and shelter.
- Places to stop and rest.
- Not too noisy.
- People choose to walk, cycle, and use public transport.
- People feel safe.
- Things to see and do.
- People feel relaxed.
- Clean air.

2.3.5 London Plan Policy T2 (B) (1) sets out that "development proposals should promote and demonstrate the application of the Mayor's Healthy Streets

Approach to: improve health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities".

2.3.6 London Plan Policy T4 (B) sets out that "when required in accordance with national or local guidance,179 transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance".

2.3.7 London Plan Policy T5 places a requirement on developments to remove barriers to cycling and create a healthy environment for people who choose to cycle. This is achieved through the provision of appropriate levels of cycle parking – designed in accordance with London Cycle Design Standards (LCDS).

Table 10.3 - Maximum residential parking standards

Location	Number of beds	Maximum parking provision*
Central Activities Zone Inner London Opportunity Areas Metropolitan and Major Town Centres All areas of PTAL 5 – 6 Inner London PTAL 4	All	Car free~
Inner London PTAL 3	All	Up to 0.25 spaces per dwelling
Inner London PTAL 2 Outer London Opportunity Areas	All	Up to 0.5 spaces per dwelling
Inner London PTAL 0 – 1	All	Up to 0.75 spaces per dwelling
Outer London PTAL 4	1 – 2	Up to 0.5 - 0.75 spaces per dwelling+
Outer London PTAL 4	3+	Up to 0.5 - 0.75 spaces per dwelling+
Outer London PTAL 2 – 3	1 – 2	Up to 0.75 spaces per dwelling
Outer London PTAL 2 – 3	3+	Up to 1 space per dwelling
Outer London PTAL 0 – 1	1 – 2	Up to 1.5 space per dwelling
Outer London PTAL 0 – 1	3+	Up to 1.5 spaces per dwelling^

2.3.8 The maximum car parking standards for residential use is set out at Table 10.3 of the London Plan. Policy T6 states that car parking should be restricted in line

with existing and future public transport accessibility and connectivity. The policy further states that car-free development should be the starting point for all developments that are well-connected by public transport.

2.4 Richmond Upon Thames Local Plan 2018

2.4.1 The Richmond Local Plan sets out the strategic planning framework for the borough for the next 15 years. The Local Plan contains the strategic vision and objectives for the borough as well as the policies and site allocations that will guide the future development of the borough.

2.4.2 Policy LP 44 (Sustainable Travel Choices) sets out "The Council will work in partnership to promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions, and maximise opportunities including for health benefits and providing access to services, facilities and employment. The Council will:

A. Location of development – Encourage high trip generating development to be located in areas with good public transport with sufficient capacity, or which are capable of supporting improvements to provide good public transport accessibility and capacity, taking account of local character and context.

B. Walking and cycling – Ensure that new development is designed to maximise permeability within and to the immediate vicinity of the development site through the provision of safe and convenient walking and cycling routes, and to provide opportunities for walking and cycling, including through the provision of links and enhancements to existing networks.

C. Public transport – Ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services. Proposals will be expected to support improvements to existing services and infrastructure where no capacity currently exists or is planned to be provided. Protect existing public transport interchange facilities unless suitable alternative facilities can be provided which ensure the maintenance of the existing public transport operations. Applications will need to include details setting out how such re-provision will be secured and provided in a timely manner.

D. The road network – Ensure that new development does not have a severe impact on the operation, safety or accessibility to the local or strategic highway networks. Any impacts on the local or strategic highway networks, arising from the development itself or the cumulative effects of development, including in relation to on-street parking, should be mitigated through the provision of, or contributions towards, necessary and relevant transport

improvements. In assessing planning applications, the cumulative impacts of development on the transport network will be taken into account. Planning applications will need to be supported by the provision of a Transport Assessment if it is a major development, and a Transport Statement if it is a minor development.

2.4.3 Policy LP 45 (Parking Standards and Servicing) sets out that The Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car-based travel including on the operation of the road network and local environment and ensuring making the best use of land. It will achieve this by:

- 1. Requiring new development to provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points, in accordance with the standards set out in Appendix 3. Opportunities to minimise car parking through its shared use will be encouraged.

2.4.4 Car free housing developments may be appropriate in locations with high public transport accessibility, such as areas with a PTAL of 5 or 6, subject to:

- a. the provision of disabled parking.
- b. appropriate servicing arrangements; and
- c. demonstrating that proper controls can be put in place to ensure that the proposal will not contribute to on-street parking stress in the locality.

2.4.5 The parking standards for the borough are set out in Appendix 3 of the Local Plan. Parking levels are based on public transport access level (PTAL) of the site. The supporting text at paragraph 11.2.1 explains that the standards set are maximum parking levels and car parking provision should not be at a level

less than these standards, unless an exceptional circumstance is demonstrated.

Table 1: Richmond Upon Thames Parking Standards

Land Use	PTAL	Size	Car Parking	Cycle Parking
RESIDENTIAL (including conversion/extension of existing	0-3	1-2 bedrooms	1 space.	As per London Plan
	0-3	3+ bedrooms	2 spaces	As per London Plan
	4-6	All sizes	As per London Plan although local circumstances, CPZ times and on street parking conditions will need to be assessed.	As per London Plan

2.4.6 The Council's maximum parking standards as set out above, is intended to allow flexibility to reflect the local circumstances. However, the main thrust of current parking policy is to restrict the level of on-site parking in order to promote travel by sustainable modes and minimise the traffic impacts of development. It should be noted that the Richmond Local Plan refers to the London Plan where in areas that record a high PTAL (PTAL 4 and above). For cycle parking standards for all residential development, the Local Plan refers to the London Plan.

Richmond Upon Thames New Local Plan

2.4.7 A new Local Plan is being developed by The Council. The new Local Plan is currently at the consultation/examination stage and is expected to be adopted this year (2024), pending the successful outcome of examination in public. As the Local Plan moves through the consultation and examination processes, it is expected that greater weight will be given to the policies in the assessment of the planning applications. Once adopted, the new Local Plan will set the strategic vision, objectives and policies for the borough for the next 15 years.

2.4.8 The draft new Local Plan reiterates The Council's commitment to promoting sustainable travel by ensuring that development proposals located in areas with good access to public transport, limits car use through car-free or car-lite development.

2.4.9 Policy 48 states that planning applicants will therefore be expected to provide off-street vehicular and cycle parking, including electric vehicle charging points, in accordance with standards set out in Policies T5 and T6.1 – T6.5 and Tables

10.2 – 10.6 of the London Plan. Electric vehicle charging points must be provided in a way that ensures the development is safe for other road users.

2.4.10 Policy 48 of draft Local Plan further states that car-free development may be appropriate where:

1. The public transport accessibility level (PTAL) is 3 or above.
2. Off-street disabled vehicular parking can be provided in accordance with standards set out as per part A above.
3. Cycle parking can, at least, be provided in accordance with the minimum standards set out in the London Plan and designed in accordance with the London Cycle Design Standards.
4. The development is in a controlled parking zone and the applicant is prepared to enter into a legal agreement which excludes all occupants from vehicular parking permits within this, including season tickets in Council-managed car parks.
5. In cases where there is no CPZ that occupants can legitimately be excluded from or that operates for only a small number of hours per day, the applicant can demonstrate, through a parking stress survey, that their development will not increase on-street vehicular parking stress above 85% of total on-street vehicular parking capacity. In certain cases, where a development is forecast significant impact on on-street parking stress in an area, mitigation may be sought in the form of financial contributions towards the cost of reviewing and changing an existing CPZ or implementing a new one.
6. Household and commercial refuse and recycling collectors can service the development safely in accordance with the Council's Refuse and Recycling Storage Requirements Supplementary Planning Document (2022).
7. It can be demonstrated that other commercial and emergency service vehicles can service the development in accordance with standards set out in Manual for Streets (see part L of this policy).
8. The applicant is prepared to consider other forms of mitigation such as the provision of free membership of a local car club for occupants, or, in instances of major developments, can provide one or more car club spaces on the site.

2.4.11 Regarding car parking, the above provisions of the new Local Plan has been given appropriate consideration in the development of the proposed scheme.

3 Site Description, Location and Context

3.1 Existing Site Description

3.1.1 The application site is located in Twickenham in the borough of Richmond Upon Thames. The site is on the corner of A305 The Green and May Road. The A305 The Green is a single carriageway road which provides access to the local road network, and onward connections to the strategic road network via the A316. The location of the site is shown at Figure 1.

3.1.2 The proposal seeks to alter the existing building on the site, to enable the proposed development comprising of four (4) new residential units (2 no. 3 bed houses, 1 no. 1 bedroom house and 1 no. 1 bedroom flat) and retention of an existing residential unit. It is understood that the existing building has been in use as residential and part commercial.

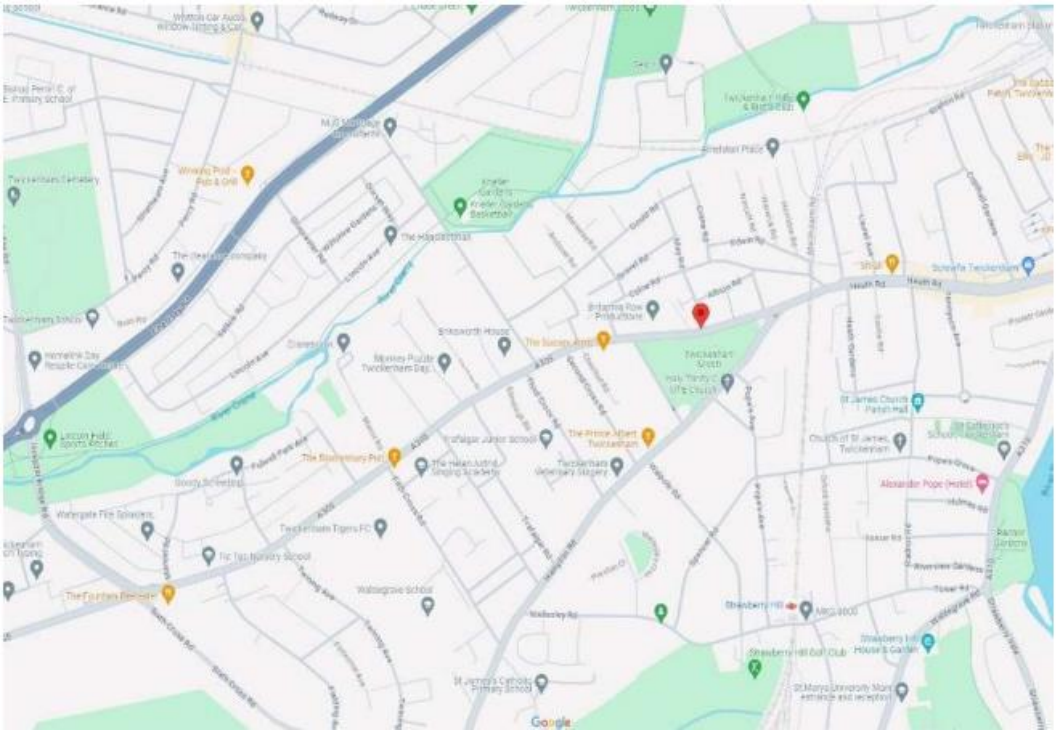


Figure 1: Site Location

3.1.3 As illustrated in the image at Figure 2, The Green, May Road and surrounding streets are within a controlled parking zone (CPZ) and are thus subject to parking restrictions – operating Monday to Saturday 8:30AM to 6:30PM. Parking on The Green is on the opposite the site in marked parking bays. The parking along The Green includes visitor parking, which restricts parking to a period of 4 hours maximum.

3.1.4 Parking in May Road is limited to a period of 1 hour, except for permit holders. Parking in May Road is the opposite side of the application site.

3.1.5 There is an existing vehicular access point on The Green, which provides

access to small a courtyard parking area which can accommodate 1 – 2 cars but has no specific cycle storage or racks – as illustrated at Figure 2.

Figure 2: Photo of the site (from The Green)

4 Accessibility

4.1 Bus

4.1.1 The site is well-located for access to buses. There are seven (7) buses operating within the maximum parameters used in PTAL calculations. These bus routes comprise: 290, 281, R70, 267, 110, 490 and N22. The peak frequency of buses ranges from 3.31 to 7.76 per hour. The nearest bus stop is Twickenham Green, approximately 30m from the site.

4.1.2 These bus routes provide access to local destinations in Richmond, such as leisure and shopping, schools, universities and hospital, and direct access to Central London and destinations in surrounding boroughs Hammersmith and Fulham, Hounslow, Ealing and Kingston. These bus routes also provide connections to rail stations, and thus offers the opportunity to combine journeys by bus and rail.

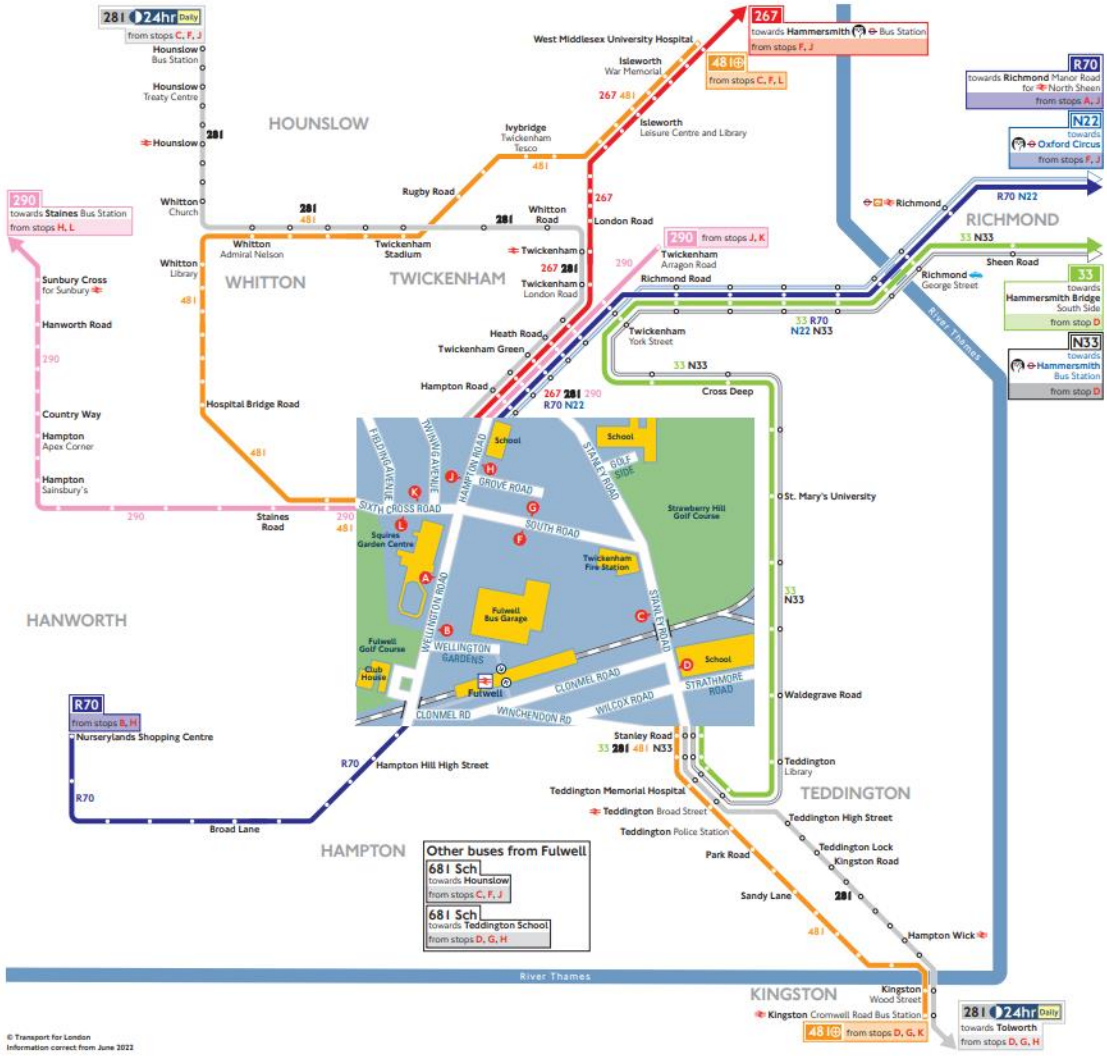


Figure 3: Twickenham Bus Map

4.2 Rail

4.2.1 The nearest rail station is Strawberry Hill, which is located approximately 900m to the south of the site.

4.2.2 Strawberry Hill station is served by South Western Rail and provides four trains per hour to London Waterloo and Shepperton in the morning peak and two trains per hour in the evening peak. The station is Zone 5 and is equipped with Oyster card facilities, which means it is integrated with the London rail network.

4.2.3 The distance between the site and Strawberry Hill station is considered attractive for walking. The walking routes (see Figure 5) to the station to the station are direct and comprises:

1) Walking through Twickenham Green.
2) Continuing onto Pope's Avenue.
3) Turn left onto Wellesley Road.
4) Continuing onto Tower Road.
5) Turning left onto Strawberry Hill station.

4.2.4 The journey time for walking to the station is approximately 11 minutes, which indicates that site enjoys good rail access by virtue of its distance from the station.

4.2.5 Strawberry Hill station can be reached by cycling in 4 minutes, following the same route as pedestrians (described above).

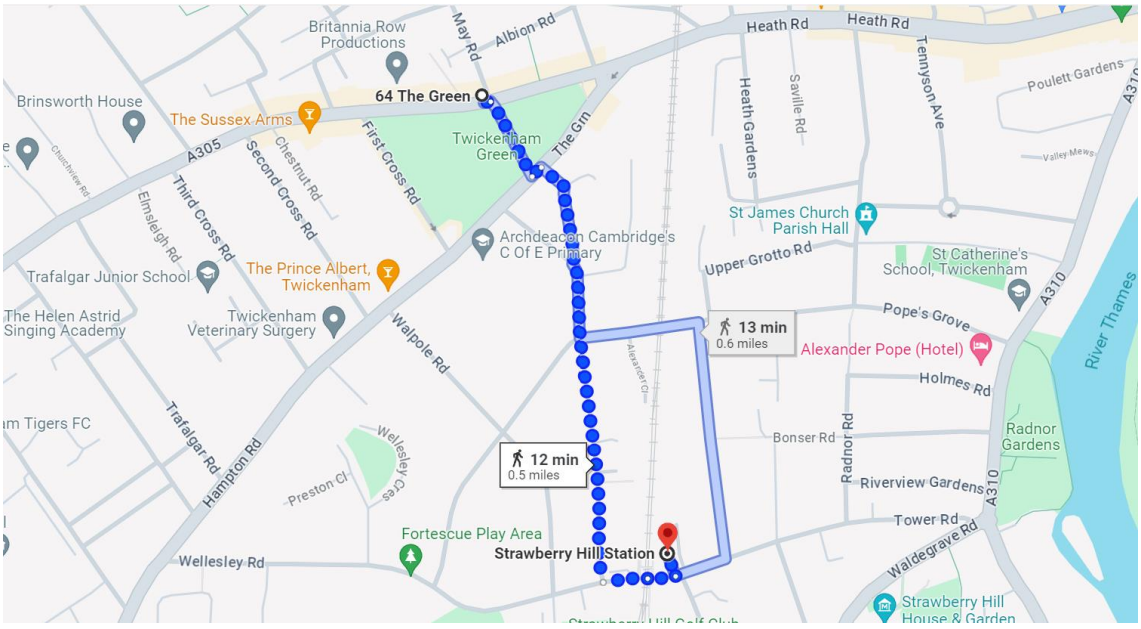


Figure 4: Walking Routes to Strawberry Hill Rail Station

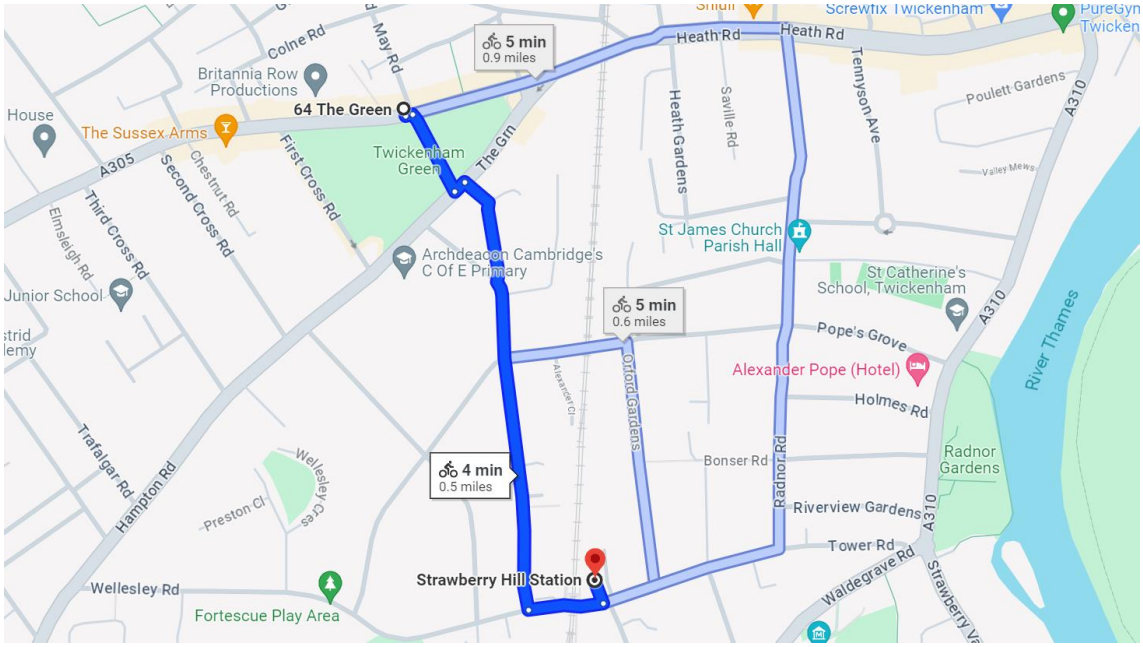


Figure 5: Cycling Route to Strawberry Hill Station

4.2.6 The TfL WebCAT tool assessed the site as PTAL of 3 to 4. This indicates a 'moderate' to 'excellent' level of access to public transport. However, the site records a small area of PTAL 4 – at the corner of The Green and May Road. The small footprint of the site means the difference between PTAL 3 and 4 is too small to influence the choice of travel mode. Taking this into consideration, it is considered appropriate to assess the site as PTAL 4.

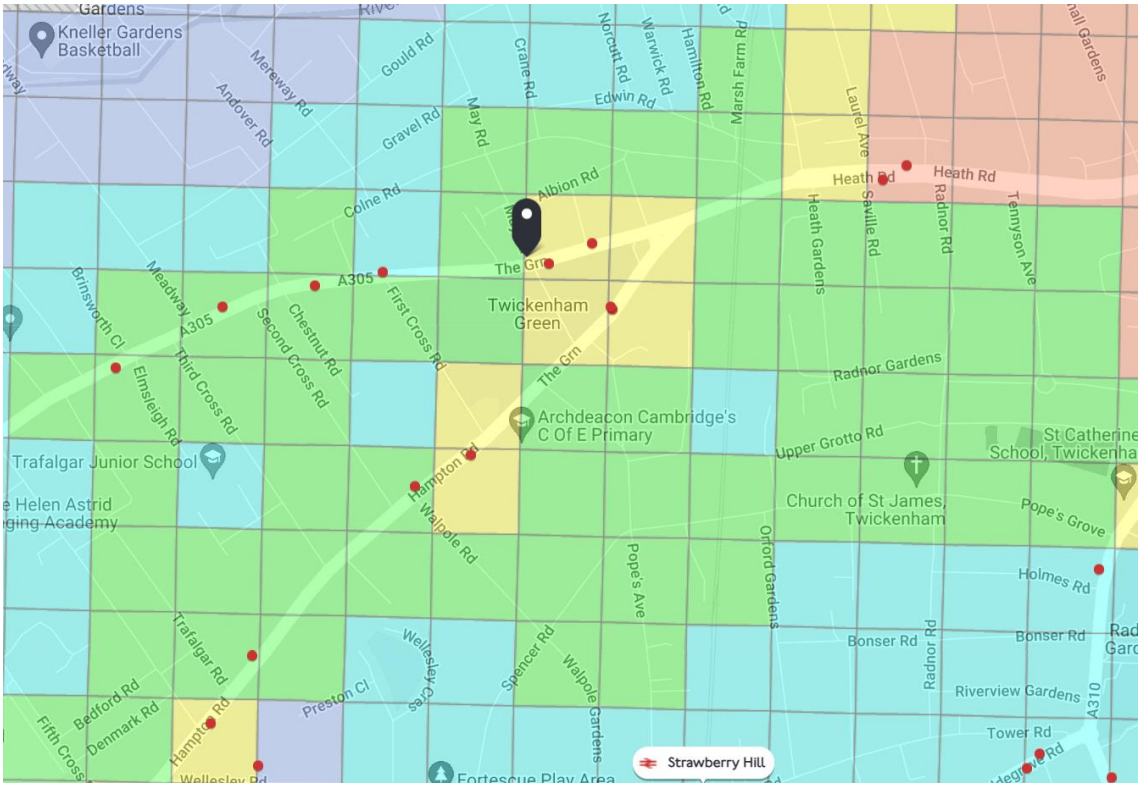


Figure 6: PTAL output for 2021. Source: WebCAT

4.3 Walking

4.3.1 There is a good network of footways in the local area, with appropriate street lighting. Walking routes to key local amenities such as River Thames, which can be accessed via Heath Road to the west of the site. The adjoining streets are well-lit and provide a comfortable and safe environment for pedestrians and cyclists.

4.4 Cycling

4.4.1 The site benefits from a good local cycle network consisting of designated cycle routes and a mixture of on and off-carriageway routes.

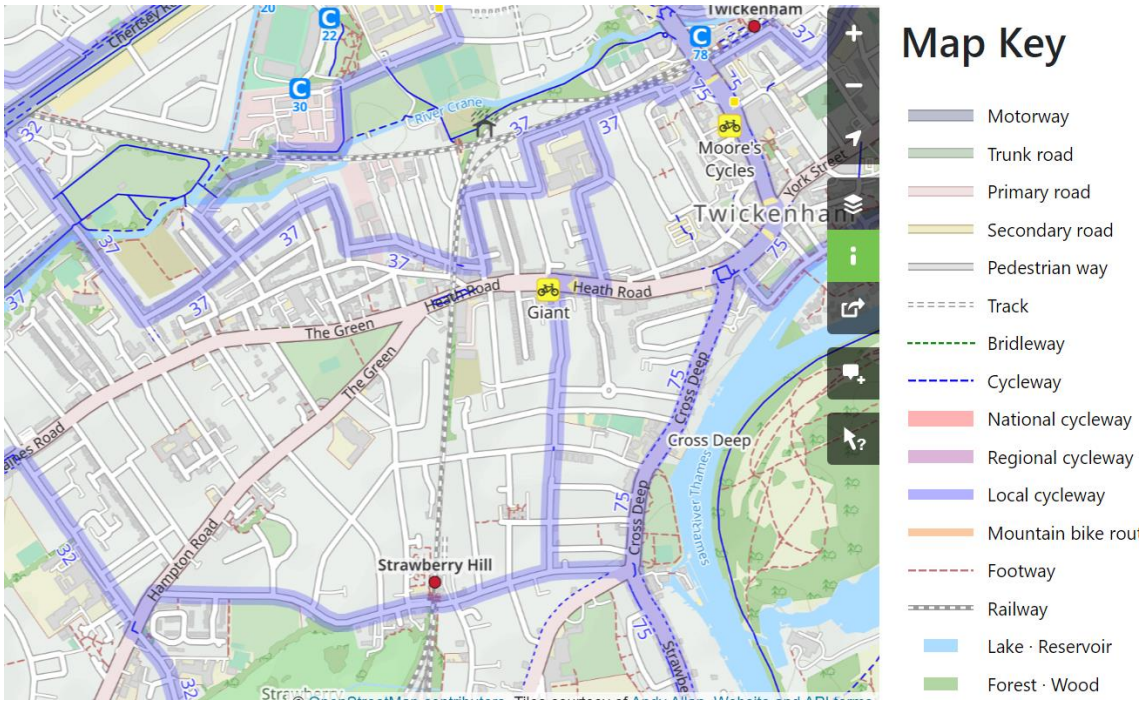


Figure 7: Cycle Network (source: Open Maps)

4.4.2 The above map indicates the existing cycle infrastructure in Twickenham. This indicates that there is a well-defined cycle network, which provides onward connections to strategic and national cycleways.

5 Development Proposal

5.1.1 The proposed development comprises part conversion of the existing building and the erection of a new buildings to provide a development comprising 4 no. residential units – 2 no. 2 bedroom house, 1 no. 1 bedroom house, and 1 no. 1 bedroom flat.

5.2 Car Parking

5.2.1 The proposed development does not envisage any on site car parking. It should be noted that the existing courtyard parking, accessed from The Green, will be removed. The layout of the proposed ground floor is at Figure 8 below.

Figure 8: Proposed Ground Floor Plan

5.2.2 Access for pedestrians and cyclists are taken from May Road and The Green – as indicated at Figure 8.

5.3 Cycle Parking

5.3.1 To comply with the London Plan cycle parking standards (set out at Table 10.2), a total of 11 cycle parking spaces are required – 1.5 spaces per 2-person 1

bedroom unit and 2 spaces per 3-bedroom unit. The London Plan recommends a provision of 2 visitor cycle parking spaces for 5 to 40 dwellings.

5.3.2 Policy compliant cycle parking equates to 11 long-stay and 2 visitor cycle parking spaces. These cycle parking spaces are provided at ground level, within each garden space – front and back gardens. The location of the cycle parking spaces are indicated on the ground floor plan below.

5.3.3 The cycle parking provision accords with The London Plan and the Richmond Local Plan. Details of the cycle parking could be secured by planning condition, if required by the council.

5.4 Refuse

5.4.1 The refuse stores are located at ground floor level and is accessed directly from May Road and The Green. The refuse storage area in May Road is conveniently located for collection from May Road, but it is also within the maximum carrying distance for refuse collection from The Green. The location of the refuse storage areas is indicated on the plan below.

Figure 9: Refuse Storage

5.4.2 The number of refuse collections for such a small development is expected to be low–typically no more than one or two collections per week.

5.5 Deliveries

5.5.1 Deliveries to the site can be accommodated on The Green. It is envisaged that delivery vehicles would typically consist of small vehicles such as 3.5t light vans that would deliver items such as post, internet shopping and supermarket deliveries. Larger delivery vehicles such as Luton vans would access the site when an occupier is moving in/out of a property. This will be a very infrequent occurrence, nevertheless these vehicles would be able to park on The Green where permitted. Alternatively, delivery vehicles can park for up to 1 hour in marked parking bays on May Road.

5.5.2 Research suggests that residential properties typically generate up to 10 deliveries per 100 dwellings per day. This would suggest that the proposed development would attract no more than one delivery vehicle per day.

6 Trip Generation and Impacts

6.1 Trip Generation

6.1.1 The proposed development is significantly below the threshold for when a full transport assessment or a transport statement is required. This means a multimodal trip generation and impact analysis is therefore not required for the scale and nature of the proposed development. Nevertheless, some consideration has been given to the potential transport and highway impacts of the scheme.

6.1.2 Based on the number of residential units, and assuming the maximum occupation of 16 people, the worst case would be 16 departures in the morning peak and 16 arrivals in the evening peak. This pattern of travel is unlikely as hybrid working post-COVID means that some residents are likely work from home on some days of the week and would suggest a lower number of trips.

6.1.3 As the proposal is car-free, walking, cycling and public transport would represent the main modes of travel by occupiers. It is not envisaged that anyone in the development would own a car, given the lack of on-site parking.

6.1.4 It should be noted that the previous use of the site as clinic would have generated a higher number of vehicular movements than the proposed use. It therefore means that the proposed development would result in net reduction of vehicle trips compared to the existing use.

6.2 Traffic Impacts

6.2.1 Based on the car-free nature of the proposed development, vehicular trip generation will be insignificant and will not create any impacts of consequence on the surrounding road network. Additionally, any public transport demand is expected to be low and will not impact materially on the capacity of the public transport services.

6.3 Parking Impacts

6.3.1 As stated in Policy 48 of draft Richmond Local Plan, a car-free development would be acceptable where the development is in a controlled parking zone and the applicant is prepared to enter into a legal agreement which excludes all occupants from vehicular parking permits within this, including season tickets in Council-managed car parks.

6.3.2 It is understood that the applicant is prepared to consider a legal agreement that prevents residents of the development from obtaining permits to park in adjoining controlled parking zone (CPZ). This is to be discussed with The

Council if it is minded approving the planning application for the proposed development.

6.3.3 In the event that it is not possible to secure a car-free agreement which removes residents' eligibility for permits to park in the adjoining CPZ, the potential demand and impacts of the development on parking in the surrounding streets has been considered.

6.3.4 To determine the potential demand the car ownership level in Census 2021 output area where the development is located has been used as proxy for demand. Census 2021 shows that 31.7% of households in output area do not own a car or van. This means that 68.3% of households own a car or van. Applying this to the development would mean only three (3) cars [5 residential units x 68.3% = 3.41] would be owned by occupiers of the proposed development.

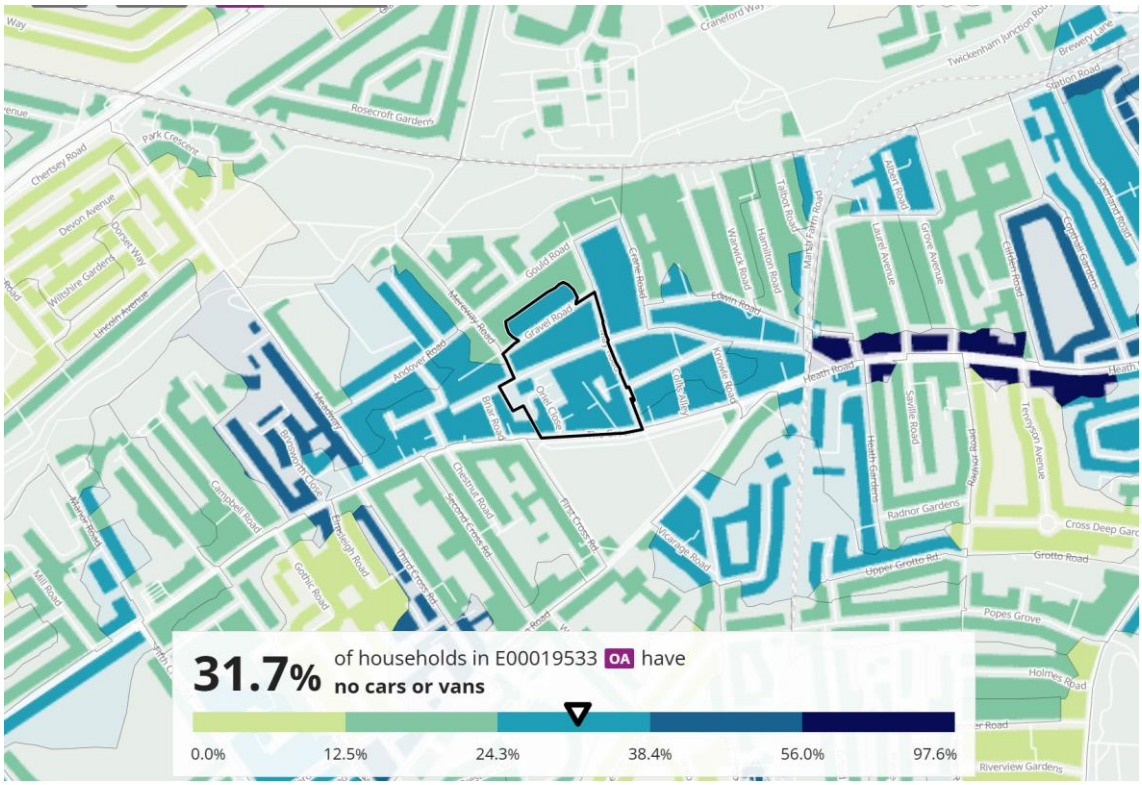


Figure 10: Car Ownership in OA E00019533 - Census 2021

6.3.5 Notwithstanding compliance with draft Local Plan Policy 48 on the basis that the site is located in an area with moderate to excellent access to public transport and the surrounding streets are within a CPZ, parking stress surveys were undertaken to assess the potential impacts on the proposed development

on the supply of parking.

6.3.6 Parking surveys in accordance with the established methodology (Richmond Upon Thames Parking Survey Methodology) was undertaken on Thursday 16th May, Friday 17th May and Sunday 19th May.

6.3.7 The parking report presenting the results of parking stress survey was submitted alongside the planning application for The Council consideration. The results show parking availability by street surveyed, parking usage, the level of parking stress for each street, and the average parking availability across the area surveyed. The key finding of the survey is that there was an average occupancy of 77% across the survey dates. This equates to 23% car parking availability in the area.

6.3.8 The level of parking stress is therefore below the threshold where the impacts of additional demand (3 cars) generated by new development could be potentially detrimental in parking terms. Furthermore, the scale of the proposal suggest that parking demand will be extremely low, if any demand is generated. In the scenario where 'car-free' agreement is not secured as part of the planning consent, there is sufficient parking availability in the surrounding street to accommodate the likely demand from this development.

6.4 Construction Traffic

6.4.1 Given the scale of the development proposal, it is not anticipated that a significant level of construction traffic movement will be generated and as such, no significant traffic impacts are envisioned during the construction phase. The access and site arrangements during construction will be given due consideration when a contractor has been appointed. A Construction Logistics Plan (CLP) setting out details such as the site construction plan, provision of loading/unloading, access, turning, number and size of construction vehicles expected to arrive/depart daily, particularly during the most intense period of construction, could be secured by planning condition – requiring submission of a CLP for approval prior to construction – if required by the Council.

6.5 Policy Compliance

6.5.1 The proposal is consistent with NPPF paragraph 115 which states that *"development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe".*

6.5.2 The Richmond Local Plan and draft new Local Plan (Policy 48) promotes car-free development in areas that are well-connected by public transport. This approach is also consistent with London Plan Policy T6, which sets out that car-free should be the starting point for development proposals in locations with good accessibility and connectivity. The site achieves a PTAL 3 and 4 – with

the higher PTAL on the corner of The Green and May Road. The PTAL of 3 and 4 justifies a car-free development in line with policy.

6.5.3 The generated travel demand from the proposed development does not rise to a level which could be considered to result in 'severe' impacts on the transport network. The car-free nature of the proposal and its size would suggest that the potential vehicular trip generation would be significantly low, if any.

6.5.4 As demonstrated by the parking stress survey, parking demand on the surrounding streets at peak times is high but this demand does not raise the parking stress level above The Council's defined threshold of 85%.

6.5.5 The proposed development offers some improvements for pedestrians, which results from the removal of existing vehicular access point on The Green and reinstatement of the footway to provide an unbroken footway along the frontage of the site.

7 Conclusion

7.1.1 In summary, it is considered that the proposed development can be accommodated by the existing transport and highway network. The level of vehicle movements likely to be generated by the development will not rise to a level that creates harm to the surrounding road network.

7.1.2 It is therefore concluded that the development will have no material impacts on the network during its construction and operation. The level of vehicle movement in the peak periods would be inconsequential in transport terms.

7.1.3 The approach to car parking accords with the Local Plan, and recommendation parking standards. As such, the development is compliant with local plan policy and standards.

7.1.4 The site a short distance from Strawberry Hill station, which can be accessed by walking for 11 minutes or cycling for 4 minutes. The local bus network provides good connections to local destinations and further afield. The site is therefore considered to have good access to public transport. In determining the level of car parking, the public transport conditions have been given appropriate considerations, as well as the parking conditions in the surrounding street.

7.1.5 The removal of the existing vehicular access and reinstatement of the footway in The Green can be secured through a planning condition, or through a Section 278 agreement with the highway authority, if required by the Council.

Policy compliant cycle parking is provided in secure areas at ground level. Details of cycle parking can be secured by planning condition, if required by the Council.

7.1.6 Overall, the proposal is compliant with objectives for sustainable transport and compliant with the Council's policies and parking standards. No material impacts on the public transport network and the road network will be created.

Appendix A – Proposed Ground Floor Plans

ELSTREELAND

64 the green, twickenham

dha architecture ltd
Brooklands Farm Business Park
Bottle Lane
Binfield
Berkshire
RG42 5QX
t. 0118 934 9666
e. *surname*@dhaarchitecture.co.uk
w. www.dhaarchitecture.co.uk

rev date by details

Location Plan

16.08.2024 created
1:500 @ A3 scaling
MI/SP contact

reference 012414-ELS-LOC01 - revision

ELSTREELAND

N

dha architecture ltd

Brooklands Farm Business Park
Bottle Lane
Binfield
Berkshire
RG42 5QX

t. 0118 934 9666
e. *surname*@dhaarchitecture.co.uk
w. www.dhaarchitecture.co.uk

rev	date	by	details
-	-	-	-

64 the green, twickenham

Proposed Site Layout

12.08.2024 created
1:100@ A2 scaling
MI contact

reference 012414-ELS-01 - revision

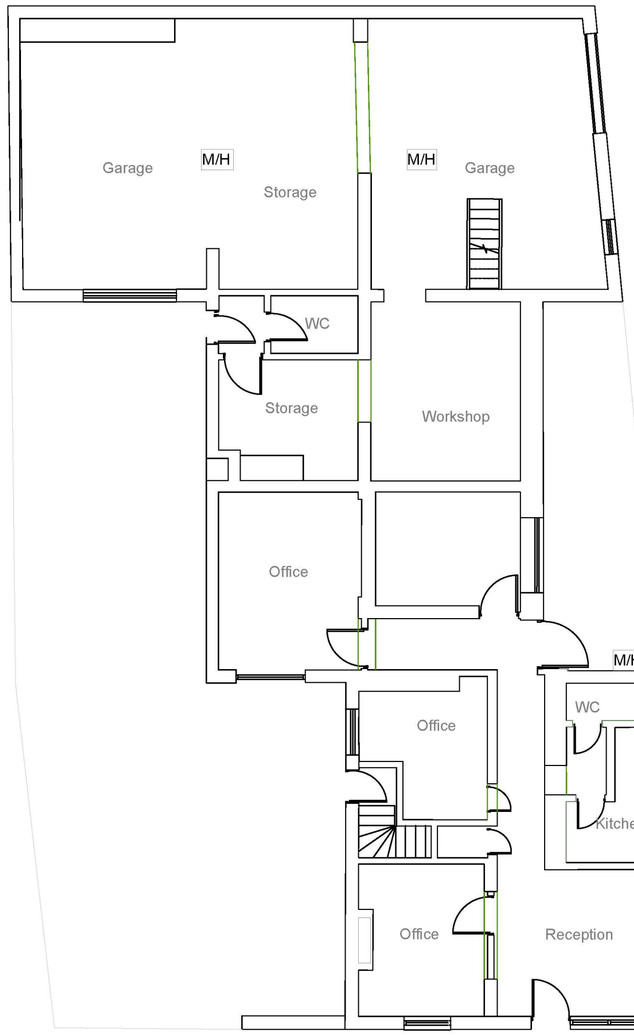
ELSTREELAND

Survey undertaken by DASH

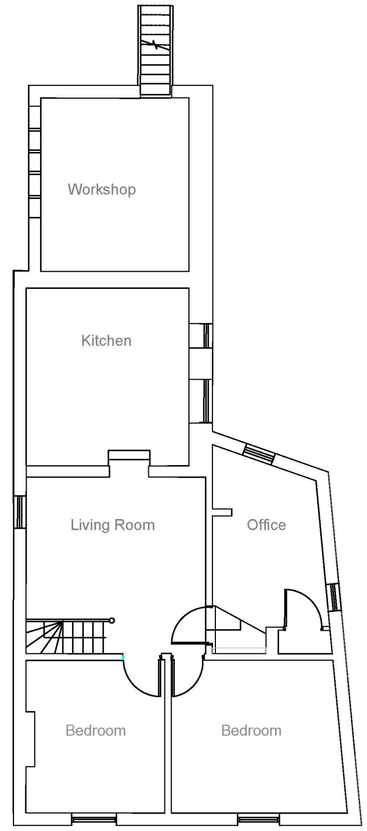
12m 10m 8m 6m 4m 2m 1:100

2m 4m 6m 8m 10m 12m

existing floor plan



Existing Ground Floor



Existing First Floor

dha architecture ltd

Brooklands Farm Business Park
Bottle Lane
Binfield
Berkshire
RG42 5QX

t. 0118 934 9666
e. *surname*@dhaarchitecture.co.uk
w. www.dhaarchitecture.co.uk

64 the green, twickenham

Existing Floor Plan

14.08.2024 created
1:100 @ A2 scaling
MI/DJ contact

reference 012414-ELS-EXISTING-P1 - revision

rev date by details

ELSTREELAND

dha architecture ltd

Brooklands Farm Business Park
Bottle Lane
Binfield
Berkshire
RG42 5QX

t. 0118 934 9666
e. *surname*@dhaarchitecture.co.uk
w. www.dhaarchitecture.co.uk

64 the green, twickenham

Proposed Ground Floor Plan

12.08.2024 created
1:100@ A2 scaling
MI contact

reference 012414-ELS-PROPOSED-P1 - revision

rev	date	by	details
-	-	-	-

ELSTREELAND

dha architecture ltd

Brooklands Farm Business Park
Bottle Lane
Binfield
Berkshire
RG42 5QX

t. 0118 934 9666
e. *surname*@dhaarchitecture.co.uk
w. www.dhaarchitecture.co.uk

rev	date	by	details
-	-	-	-

64 the green, twickenham

Proposed First Floor Plan

12.08.2024 created
1:100@ A2 scaling
MI contact

reference 012414-ELS-PROPOSED-P2 - revision

Appendix B – Public Transport Accessibility Level

TRANSPORT FOR LONDON | Plan a journey | Status updates | Maps | Fares | Help & contacts | More | Search

We are currently updating WebCAT
In the meantime, to request the latest PTAL dataset, email SMBWebCAT@tfl.gov.uk

More

Urban planning & construction > Our role in planning > Planning with WebCAT > Webcat planning tool

WebCAT

Address or co-ordinates

64 the green twickenham × Go

Access level (PTAL) | Time mapping (TIM)

PTAL: a measure which rates locations by distance from frequent public transport services.

Map key - PTAL

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

Map layers

PTAL (cell size: 100m)

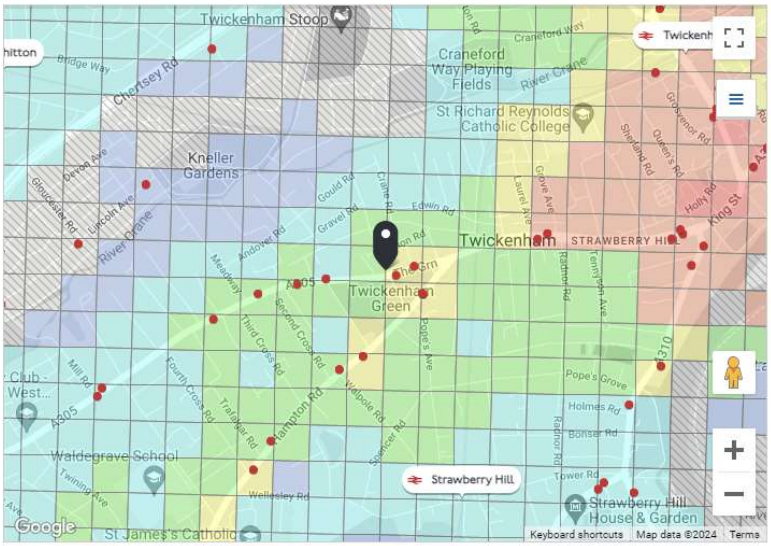
Scenario

2021 (Forecast)

☐ Highlight locations where PTALs have changed from Base Year

Update

What is WebCAT?



You can click anywhere on the map to change the selected location.

PTAL output for 2021 (Forecast)
3

64 The Grn
64 The Grn, Twickenham TW2 5AG, UK
Easting: **515293**, Northing: **173019**

All public transport modes in London available in 2021:
National Rail, London Overground, Tube, DLR, Tram, Buses
Principal public transport network improvements include schemes held in TfL's committed and funded transport investment programme eg Crossrail 1 - linking east and west London.
Bus services are based on the base year network with a 3% uplift in frequencies.