

TRANSPORT TECHNICAL NOTE

PROJECT	P2410.3 15 LARKFIELD ROAD, RICHMOND, TW9 2PG
DATE	JANUARY 2025
REASON	FULL PLANNING APPLICATION
AUTHOR	ALEXANDER OSBORN BSc Hons, PG Dip, CMILT, FCIHT, FIHE

1. INTRODUCTION

KRONEN have been instructed to support a full planning application for boundary treatment and landscape changes, a crossover and an electric vehicle off-street parking space at 15 Larkfield Road, Richmond, TW9 2PG.

2. PROPOSAL

The site, 15 Larkfield Road, comprises semi-detached house.

The site does not have vehicle access or off-street parking.

The application seeks boundary treatment and landscape changes, a crossover and an electric vehicle off-street parking space at 15 Larkfield Road.

4D Architects are the architects for the application.

Refer to 4D Architects' existing and proposed site plans.

3. ASSESSMENT PER LB RICHMOND'S ONLINE DROPPED KERB INFORMATION

As noted on 4D Architects' Proposed Site Plan the new paved area will be permeable block pavers.

With regards to the dimensions and comments per "Your plan" section of the LB Richmond's online dropped kerb application form "Apply for a dropped kerb" [Online] <

https://www.richmond.gov.uk/services/roads_and_transport/pavements/dropped_kerbs/apply_for_a_dropped_kerb > [November 2024], the following dimensions are of note for the determination of the application:

- A – Width of flat section – 7.1m (the proposed access is a shared / common access with neighbouring 17 Larkfield Road, refer to comments below in Section 6)
- B – Depth of parking space – up to 4.6m (refer to comments below)
- C – Width of garden – 7.4m
- D – Proximity to light column – None in close proximity
- E – Boundary treatment heights – Dwarf walls below 0.6m high (with piers / pillars and railings)
- F – Depth of grass verge – No grass verge
- G – Proximity to junctions etc. – None in close proximity
- Ha – Street tree proximity – None in close proximity
- Hb – Street tree circumference – None in close proximity
- I – Proximity to boundary – at the common / shared boundary with 17 Larkfield Road

J – Utility covers – None in close proximity (water meter covers shown on Figure 1)

K – Proximity to traffic calming – None in close proximity

An annotated copy of 4D Architects' Proposed Site Plan is provided in Figure 1.

With regards to the recent "Highways authority requirements" [Online] < https://www.richmond.gov.uk/media/ocihn2wr/highways_authority_requirements.pdf > [November 2024], various comments about the proposal are provided in turn:

5.4 - Proposed parking space is parallel to the public highway.

5.4 - Proposed space is 4.8m x 2.4m in size and would accommodate large private vehicles without overhanging the footway.

5.4 - Gates are not proposed.

5.4 - The proposed space would not block direct access to the front door; a paved space of at least 1.8m wide would provide unimpeded pedestrian access from the footway to the front door and side passage.

5.5 – Larkfield Road is not a classified road; reverse gear ingress or egress is considered acceptable. AutoCAD Vehicle Tracking swept path analysis is provided in enclosed Figure 2 (allowing for on-street parking and one-way traffic direction flow).

5.11 - The proposed access is a shared / common access with neighbouring 17 Larkfield Road and is 7.1m wide exclusive of ramps / "rakers" either side.

5.12 - The proposed access would result in the loss of an existing 5.1m long on-street parking bay outside the site. New off-street parking at the site would reduce on-street parking demand by 1 x car, as such the proposal would likely have a neutral on-street stress impact (as noted at several recent appeals for similar proposals for example, 1 Bolton Gardens in Teddington and planning appeal "APP/L5810/D/22/3298375").

4. ASSESSMENT PER "TRANSPORT SUPPLEMENTARY PLANNING DOCUMENT" (LB RICHMOND, 2020) "APPENDIX – FRONT AND SIDE GARDEN PARKING"

It is understood that requirements in the Appendix of the SPD have been superseded by the "Highways authority requirements" discussed above for vehicle access and front garden off-street parking proposals.

5. RECENT PLANNING REFUSAL

In August 2024 application "23/3071/HOT" for the "Creation of a vehicular crossover with associated boundary treatment works and landscaping. Installation of electric vehicle charging point" was refused at the site.

The sole reason for refusal is copied below:

"By reason of the unacceptable width, siting, layout, and in the absence any detail showing the layout, the dropped kerb and associated hardstanding for car parking is considered to adversely impact on the free flow of traffic in the locality to the detriment of highway and pedestrian safety. The proposal would be contrary to, in particular, Paragraph 111 of the NPPF, Policies LP44 and LP45 of the Local Plan (2018), Policy 48 of the Publication Local Plan (Regulation 19 Version) and the Council's Transport SPD (2020)."

Further, the officer's report includes the following summary:

"The proposal is contrary to the LBRuT Transport SPD2020 on a number of points:

- The width of the flat section of the crossover when shared with No.17 Larkfield Road would be more than 4.8m
- The footway cross over would be grouped together for more than 2 vehicles in a row.

- The parking space would be sited in front of the main door to the house, and it is evident from street view images, that a car would overhang the pedestrian footway:



As noted above, the SPD states that the garden must be able to accommodate a car parked at 90° to the footway and the car-standing area must be a minimum size of 2.4m wide and 5m long, with a further clearance of at least 1m to the front of the property.

With the points made above the proposed scheme would be contrary to policy and is considered unacceptable in this respect.”

6. PROPOSAL ASSESSMENT IN LIGHT OF THE REFUSAL OF APPLICATION “23/3071/HOT”

6.A. CROSSOVER WIDTH

Number 17 Larkfield Road has a 3.6m wide dropped kerb flat section.

The current proposal would create a shared / common dropped kerb for 15 and 17 Larkfield Road, this would increase this to 7.1m wide dropped kerb flat section.

This is not compliant with LB Richmond’s guidance.

6.B. CROSSOVER GROUPINGS

The refused application sought a shared / common dropped kerb for 13, 15, and 17 Larkfield Road.

The current proposal would create a shared / common dropped kerb for 15 and 17 Larkfield Road.

The proposal would comply with LB Richmond’s guidance in this regard.

6.C. PARKING SPACE AND FRONT DOOR ARRANGEMENTS

The refused application may have created a situation where a large car obstructed access to the front door.

The current proposal allows a large car to park without obstructing access to the front door; the proposal would comply with LB Richmond's guidance in this regard.

6.D. PARKED CARS OVERHANGING THE PUBLIC HIGHWAY / FOOTWAY

The refused application had potential to create a situation where a large car could overhang the site boundary on to the footway (as demonstrated on the image sourced by LB Richmond).

The proposal allows a large car to park without overhanging the footway.

The proposal would comply with LB Richmond's guidance in this regard.

6.E. PARKING AT 90° TO THE FOOTWAY

The proposal would create a parking space that is parallel to the public highway.

This is not compliant with LB Richmond's guidance.

6.F SUMMARY

The proposal provides a considered response to the majority of the points of objection of the refused application.

However the proposal creates a crossover wider than 4.8m and requires cars not to park at 90° to the footway.

If LB Richmond solely assess the proposal with a rigid application of their guidance then the proposal would likely be refused.

However the "National Planning Policy Framework" (MHCLG, 2024) has a different threshold.

Paragraphs 115 to 117 state (p. 33):

"115. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users;
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code48; and
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

116. 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, following mitigation, would be severe, taking into account all reasonable future scenarios.

117. Within this context, applications for development should:

- a) 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;

- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) 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;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”

As above National Planning Policy Framework has a threshold of unacceptable impact on highway safety, and severe impact.

Having seen the application of National Planning Policy Framework at appeal on similar applications a more case-by-case assessment is considered a more reasonable approach than the blanket application of local dimensions requirements / guidance.

Whilst preparing this Note the site was visited.

It is noted that the north-south section of Larkfield Road has similar properties and front garden arrangements (Larkfield Road numbers 9 to 33, 35 to 39, and 2 to 10). Ordnance Survey mapping shows similar building lines, front gardens and straight footway and carriageway alignment.

The majority of houses on the same side of Larkfield Road as the application site (east side of the carriageway) have dropped kerbs / crossovers and front garden parking; only 11 Larkfield Road and 15 Larkfield Road (the application site) have no access and no parking.

Many of these houses have wide crossovers, parking at angles (not 90°) and some even have parked vehicles overhanging the footway.

In practice this does not appear to be problematic.

LB Richmond have approved parallel parking arrangements, for example “16/4475/FUL” (“Replacement of front garden with hard-standing for one parking and associated soft landscaping”) at 16 Ellerker Gardens in Richmond.

Transport for London’s Collision Data Request Team has been contacted to request Personal Injury Collision data to assess safety with regards to past reported incidents.

A request for data covering Larkfield Road and St John’s Road for the most recent 3-year period available has been made; 3-years being the standard TfL / DfT accident analysis period

TfL Collision Data, for the 3 year period ending June 2024, shows a single “slight” collision with no “serious” or “fatal” injury collisions have been recorded for the area and time. The TfL output is enclosed.

The slight collision occurred on St John’s Road. Limited information is provided on TfL input however the following is included:

“On Monday 7 August 2023 At 16:30 A Collision Occured On Saint John’S Road, 83 Metres East Of The Junction With Church Road. In Richmond Involving One Car And One Pedal Cycle”.

The TfL data suggests that there is no accident “black spot in the area” and existing access and parking arrangements similar to those proposed at 15 Larkfield Road (Larkfield Road numbers 9 to 33, 35 to 39) are not problematic.

The appeal for 1 Bolton Gardens in Teddington, “APP/L5810/D/22/3298375”, was referenced earlier in this Note.

Paragraphs 3 to 9 of the appeal decision letter states:

“3. The appeal property is a detached dwelling standing virtually at the northern end of Bolton Gardens. In dealing with design/visual amenity issues the planning officer’s report says:

“..it is noted that a number of properties along Bolton Gardens benefit from vehicular access...”

4. Whilst the planning officer has noted the existence of several similar developments to that proposed having taking place locally, his/her highway and transportation colleagues do not appear to have acknowledged this or taken it into account.

5. Nos 5, 7, 9 & 11 Bolton Gardens are all on the same side of the street and are built on the same building line as the appeal property; all have car parking spaces at the front. Their garden dimensions are very similar to that of the appeal property. On the other side of the street, Nos 2, 4, 6, 8, 10 & 12 all have car spaces in their front gardens.

6. The Council say that the appeal site’s frontage is too narrow by about 600mm to facilitate desirable visibility spays¹, and that the front garden is insufficiently deep to meet the Council’s standards. The Council fears that the tails of cars using the proposed space would overhang the footway causing obstruction. Most of the car spaces mentioned above were occupied when I visited, mainly by family sized cars. Only one overhung the footway, marginally so, by a matter of millimeters, and that was due to poor parking rather than a lack of space.

7. It appears to me that the Council’s objections are based on what appears to me to be a rigid and over-enthusiastic application of dimensional guidelines², in circumstances where the proposal is only marginally below the recommended standards, and where numerous local examples exist of similar development as proposed having taking place without apparent harmful effects³. In my view, given a normal level of caution and care when driving, the use of the proposed space is not likely to harm either highway or pedestrian safety.

8. The Council also expresses concern at the loss of an on-street parking space, and that this would allegedly lead to increased ‘parking stress’ in Bolton Gardens and adjacent streets, resulting in unsafe use of carriageway. To my mind, however, the loss of the on-street space would be off-set by the provision of a space in the appelliant’s front garden. This would also assist in alleviating any “stress” or inconvenience suffered by the appelliant when looking for an on-street parking space close to her property. That the space allows for the opportunity to charge a vehicle conveniently should, to my mind, be regarded as a positive environmental benefit of the scheme.

9. I therefore conclude that the proposed development could proceed without harming highway or pedestrian safety. Accordingly, I find no conflict with that provision of LP4 policy L45 that there should be no material impact on road or pedestrian safety arising from development proposals.”

Likewise, it is considered that if the current application is assessed on a case-by-case basis with a wider NPPF impacts perspective, and considering setting / context etc., rather than a strict application of LB Richmond’s guidance, then the proposal is acceptable despite not having a car parked off-street at 90° or having a dropped kerb flat section of 2.4m to 4.8m.

7. OTHER MATTERS

The applicant currently has a petrol VW Touran.

The proposal includes an Electric Vehicle charge point.

The proposal would facilitate applicant to switch to an Electric Vehicle, which is not currently feasible.

Several recent appeals have highlighted that Electric Vehicle parking provision for existing houses contribute towards sustainable development and travel in the Borough, for example, 42 to 44 Rosemont Road in Richmond and planning appeal "APP/L5810/D/22/3303027").

In this regard the proposal has an element of public betterment.

8. SUMMARY

The proposal has been assessed against LB Richmond's online dropped kerb application information and requirements as well as a case-by-case basis with a wider NPPF impacts perspective, and is considered to be acceptable.

The proposal would facilitate applicant to switch to an Electric Vehicle, which is not currently feasible.

As discussed, with regards to transport impacts Paragraph 116 of the "National Planning Policy Framework" (MHCLG, 2024) includes direction of only preventing or refusing development on transport grounds where "there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe, taking into account all reasonable future scenarios".

The proposals are not considered unacceptable / severe in this context and is therefore considered not objectionable in a planning context.

PREPARED FOR MRS RABBITTS
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B24 Larkfield Road Personal Injury Collisions 36 months to end of June 2024 (Provisional)

(data for 2024 is provisional)

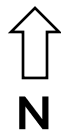
Legend

Most severe injury:

- Slight
- Serious
- Fatal

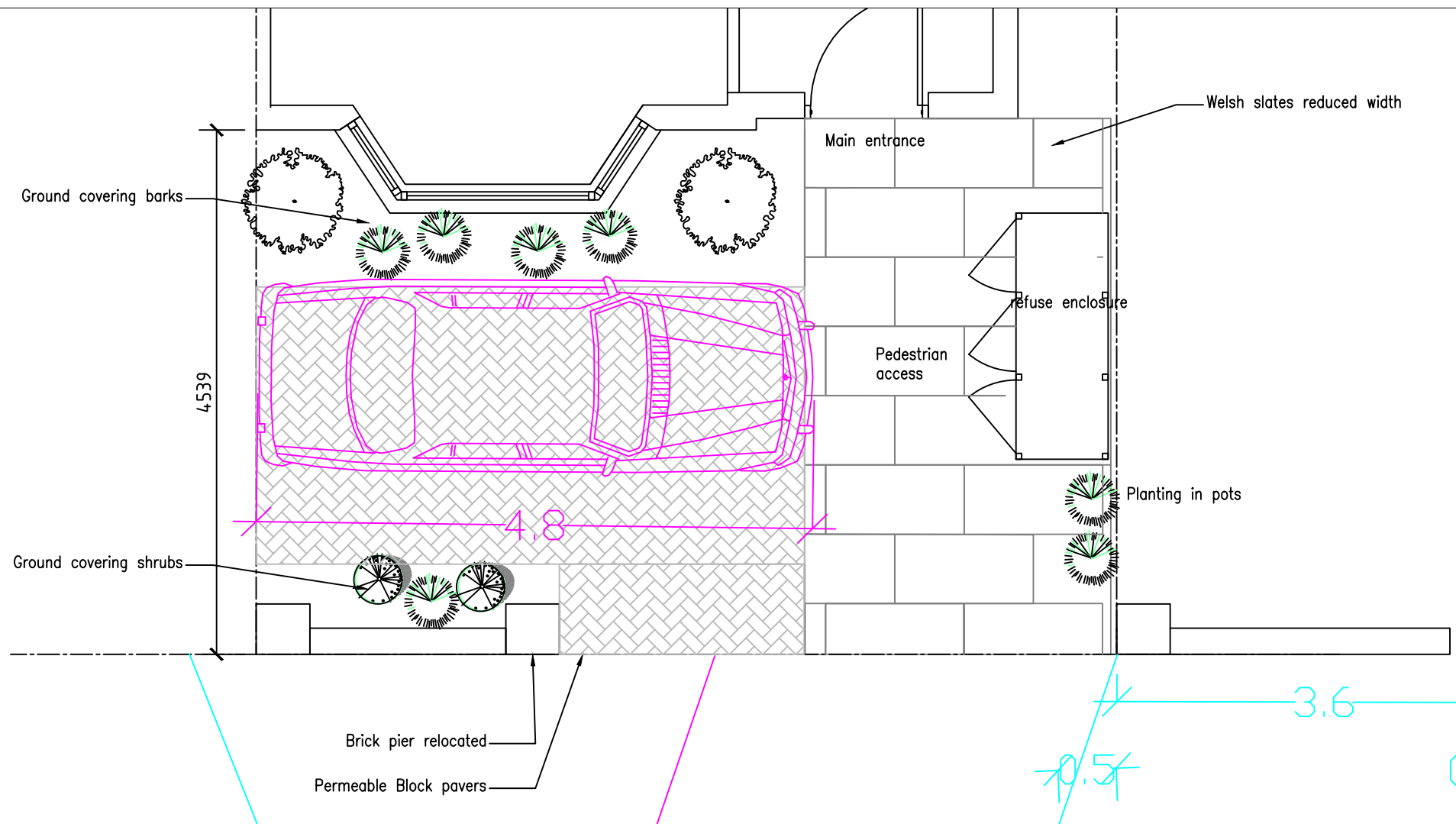
Number of collisions:

- Single
- Multiple



TfL City Planning
CollStats 3.0.3
08 November 2024

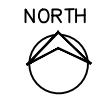




EXISTING DROPPED KERB TO NEIGHBOUR AT 17 LARKFIELD ROAD (3.6M WIDE FLAT SECTION PLUS RAMPS/TAPERS)

EXISTING DROPPED KERB TO NEIGHBOUR AT 13 LARKFIELD ROAD

SUGGESTED PROPOSED SHARED/COMMON DROPPED KERB TO 15 AND 17 LARKFIELD ROAD (7.1M WIDE FLAT SECTION PLUS RAMPS/TAPERS)



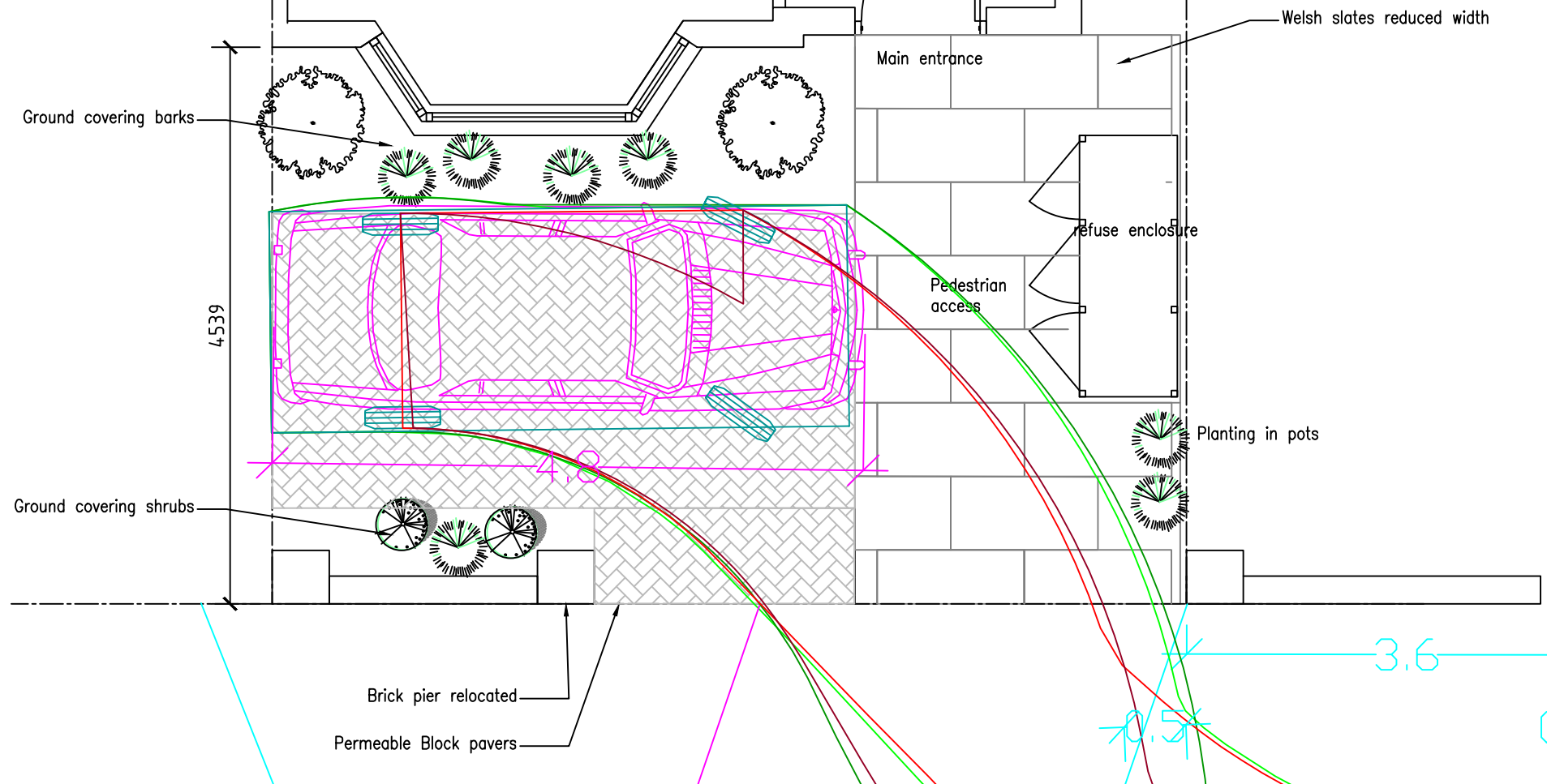
SCALE 1:50 @ A3

PROJECT P2410.3
LARKFIELD ROAD,
RICHMOND

TRANSPORT TECHNICAL NOTE
FIGURE 1

PROPOSED SITE PLAN WITH
ANNOTATIONS

KRONEN
SPECIALIST DEVELOPMENT TRANSPORT PLANNING



EXISTING DROPPED KERB TO NEIGHBOUR AT 17 LARKFIELD ROAD (3.6M WIDE FLAT SECTION PLUS RAMPS/TAPERS)

EXISTING DROPPED KERB TO NEIGHBOUR AT 13 LARKFIELD ROAD

SUGGESTED PROPOSED SHARED/COMMON DROPPED KERB TO 15 AND 17 LARKFIELD ROAD (7.1M WIDE FLAT SECTION PLUS RAMPS/TAPERS)



SCALE 1:50 @ A3

PROJECT P2410.3
LARKFIELD ROAD,
RICHMOND
TRANSPORT TECHNICAL NOTE
FIGURE 2
AUTOCAD VEHICLE TRACKING LARGE
ESTATE CAR REVERSE GEAR INGRESS
FORWARD GEAR EGRESS

KRONEN
SPECIALIST DEVELOPMENT TRANSPORT PLANNING