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ANALYSIS OF
WSP TRANSPORT ASSESSMENT JULY 2021 –
PLANNING REFERENCE 21/2758/FUL

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Paul Mew Associates is instructed on behalf of the Eel Pie Island Association (EPIA) to provide transport consultancy services in relation to the Twickenham Riverside development.

The following notes have been prepared following a comprehensive review of the Transport Assessment prepared by WSP dated July 2021 submitted with the planning application for the Twickenham Riverside scheme – planning reference 12/2758/FUL. A description of the proposal is as follows:

“Demolition of existing buildings and structures and redevelopment of the site comprising 45 residential units (Use Class C3), ground floor commercial/retail/cafe (Use Class E), public house (Sui Generis), boathouse locker storage, floating pontoon and floating ecosystems with associated landscaping, re-provision of Diamond Jubilee Gardens, alterations to highway layout and parking provision and other relevant works.”

ACCESS & SERVICING

1. The planning application involves major changes to the access and servicing strategy for The Embankment area which includes new two-way operations along both Water Lane and Wharf Lane, only limited (to be determined) access along The Embankment for large vehicles, turning and manoeuvring of HGVs at the bottom of Water Lane in a shared space, and a new servicing bay on King Street.

2. The proposals involve restricted use of The Embankment by vehicles by way of a Traffic Regulation Order (TRO), however very little additional detail has been given on this aspect of the scheme to allow a proper assessment to be made of the impacts of the proposed development on the residents, businesses, and leisure uses on EPI. The arrangements for HGVs to use The Embankment, ensuring that adequate flexibility can be accommodated, is critical to the bespoke requirements of EPI most notably the boat yard and the slipways businesses. The Council's adopted Local Plan Policy LP 18 'River Corridors' Part E 3 is of significance to this assessment:

"Riverside uses, including river-dependent and river-related uses

E. The Council will resist the loss of existing river-dependent and river-related uses that contribute to the special character of the River Thames, including river-related industry (B2) and locally important wharves, boat building sheds and boatyards and other riverside facilities such as slipways, docks, jetties, piers and stairs. This will be achieved by:

3. requiring an assessment of the effect of the proposed development on the operation of existing river dependent uses or riverside gardens on the site and their associated facilities on- and off-site;"

3. A comparison is made to a recent modification to the TRO on Church Street which prohibits vehicular access from 10am to midnight daily, however this is largely in response to COVID-19 and the need for social distancing and to accommodate al-fresco dining for the cafes and restaurants. Church Street is not comparable to The Embankment and the delivery and servicing requirement of EPI. It is noted that a loading bay which has been provided on Water Lane near the junction with Church Street to accommodate displaced loading demands because of the TRO on Church Street will be removed and not replaced in the Twickenham Riverside scheme. This may result in further displacement of loading activity for Church Street in the servicing area at the southernmost end of Water Lane which has principally been planned to accommodate the servicing and parked-up servicing requirements of EPI.
4. The development has been predicted to generate two HGV trips a day. Any goods vehicle larger than 7.5t would need to access the site via Water Lane owing to the proposed 7.5t gross vehicle weight (GVW) restriction on Wharf Lane. This may result in further displacement of loading activity for the development in the servicing area at the

southernmost end of Water Lane which is principally intended to serve the requirements of EPI.

5. The planned two-way working of the Water Lane junction with King Street raises issues which do not appear to have been assessed to an adequate degree in the planning submission. The proposed new kerb radii on the northwest and northeast corners of the junction get very close to mature established street trees. Drawing 70059704-TP-SK-35 Rev P04 confirms that the works proposed at both the northwest and northeast radii of the junction falls within the root protection zone of the existing mature street trees on each side of the junction. It is unclear whether the new carriageway construction will be to the detriment of the health of these trees.
6. The widening of the carriageway on Water Lane immediately south of the junction with Church Street appears to create a narrow pinch-point on the footpath adjacent to 31 Church Street and 1a Water Lane. This would be unsafe for pedestrians, especially for people in wheelchairs or people with pushchairs, and may result in conflict between pedestrians and vehicles.
7. Maximum vehicle to vehicle visibility sightlines from the Water Lane junction with King Street are shown to be 27.5-metres from a 2.4-metre set-back. The Department for Transport (DfT) publication Manual for Streets (MfS) states that 25-metres is an adequate vehicle to vehicle stopping sight distance (SSD) for a 20-mph design speed. It is noted that King Street is subject to a 20-mph speed limit and therefore this visibility sightline may be adequate. However, it is unclear whether vehicle traffic on King Street generally adheres to the speed limit as a speed survey has not been carried out as part of the design and appraisal of the new two-way working at the Water Lane junction. MfS paragraph 7.5.2 states that for existing streets the measured 85th percentile speed is used for SSD measurements.
8. The widening of the carriageway on Wharf Lane will result in narrow footpaths on both sides of the road which provides an inadequate and uninviting pedestrian environment leading to the development and the riverside. This point is acknowledged in the Designer's Response to the RSA at Appendix H of the Transport Assessment which is set out later in this document.

9. Drawing 70059704-TP-SK-52-TR10 shows a Richmond Council refuse collection vehicle accessing the scheme from King Street to Water Lane, along The Embankment, into the service yard at the rear of the development, and along Wharf Lane to King Street. The vehicle cannot fit within the proposed gates in the service yard when performing a three-point-turn. If this manoeuvre cannot be accommodated the vehicle would need to reverse a long distance back to Wharf Lane which would be unsafe and would not comply with the Council's Refuse and Recycling Storage Requirements Supplementary Planning Document (SPD). The vehicle is then shown to traverse Wharf Lane on the wrong side of the road from the service yard to King Street, presumably to get an adequate sweep out of the Wharf Lane junction onto King Street. A vehicle turning into Wharf Lane from King Street would have inadequate forward visibility to see an HGV driving up Wharf Lane on the wrong side of the road which could lead to head-on collisions or rear-end shunt collisions if a vehicle had to suddenly stop.

10. Drawings 70059704-TP-SK-52-TR11 and TR12 shows HGVs needing to manoeuvre across the informal pedestrian crossing point to the east of the embankment. This raises safety concerns with regards to potential conflict between large goods vehicles and pedestrians/cyclists at this location and reaffirms the need for a comprehensive RSA as will be discussed in the following section.

ROAD SAFETY AUDIT (RSA)

11. It is noted that the Audit and site visit was carried out in September 2020 during meetings between the project team and the EPIA.

12. Paragraph 1.2.10 of the Stage 1 RSA states that the terms of reference of the audit did not include The Embankment, specifically in terms of pedestrian and cyclist features. This is something that we had consistently asked for during our pre-submission engagement with the project team, and in our professional view this means that the audit is incomplete as it has not included the whole scheme.

13. Sections 3.2.2 and 3.2.3 and the Schedule of Documents Examined at Appendix A of the RSA confirms that the safety audit team were not presented with any of the vehicle tracking diagrams of the turning manoeuvres at the bottom end of Water Lane and Wharf Lane. Given how crucial this part of the proposal is, it is very surprising that the audit did

not include the entire scheme. A Sustrans cycle route follows The Embankment to Wharf Lane.

14. Problems 3.1.1 and 3.2.1 raise significant safety concerns with the proposed two-way workings at Water Lane and Wharf Lane, with the audit team even recommending at 3.2.1 that 'if possible, retain the one-way arrangement for Water Lane and Wharf Lane'.
15. The Designer's Response to the RSA at Appendix H of the Transport Assessment acknowledges that there are safety issues with the two-way workings at both junctions, most notably the Wharf Lane junction with King Street. The responses appear to be accepting of a level of risk to road safety resulting from the two-way operations at both junctions (excerpts below are taken from the RSA Designer's Response) which is not in keeping with the Mayor's 'Vision Zero', and Policies T2 'Healthy Streets' and T4 'Assessing and Mitigating Transport Impacts' in the London Plan (March 2021).

"Officers accept that some carriageway widening at both junctions will help two-way flow to operate, but this is taking further valuable space from pedestrians at this busy town centre location."

"CONCLUSION

WSP have made some amendments to the Wharf Lane design to reduce the risk, however there is still insufficient width for vehicles passing each other in opposite directions to do so safely. The relocation of the loading bay to south of the service road junction, would largely address this risk in Wharf Lane road, but this would still be problematic at the junction with King Street. WSP accept that this is still a safety concern, but advise that the low volumes of vehicles using the junction, combined with the fact that they will be travelling at low speeds helps reduce the risk to an acceptable level.

Officers partially agree with this assessment, however vehicles turning left into Wharf lane would have very limited sight lines into the road until they have committed to the turn. This could result in reversing manoeuvres which could cause potential conflict with pedestrians and cyclists. Intervisibility between pedestrians on King Street and vehicles exiting Wharf lane are poor.

In summary, officers accept that the mitigation measures proposed by WSP have helped address the safety concerns and also accept that the number of vehicles making the turning movements are low, but there are still safety concerns about two way movements, the lack of visibility and potential conflict between vehicles and pedestrians and cyclists at this junction.

PARKING

16. Appendix C of the Transport Assessment submitted with the planning application comprises of a report to the Council's Transport and Air Quality Committee dated 15th June 2021 regarding the parking and servicing proposals arising from the Twickenham Riverside development. The proposals set out in the document as well as a preceding document submitted to the Transport and Air Quality Committee in November 2020 were aimed at addressing the displacement of parking demand from the 82 parking spaces that would be removed from The Embankment/Water Lane/Wharf Lane area as part of the Twickenham Riverside development

17. Paragraph 3.9 of the committee report at Appendix C of the Transport Assessment states:

"Based on the parking beat surveys undertaken alone, the total average parking stress across all parking space permit designation types was 76%, proving that the whole of Zone D is just over three quarters occupied during the hours of 1am to 5am. This figure rises to 79% with removal of the 82 spaces in the Twickenham Riverside area. This calculation does not include the additional 28 CPZ new spaces as described in paragraph 3.4"

18. This is too broad of an assessment of the actual parking impacts that are likely to arise because of the proposal. The impact of the loss of 82 parking spaces is evidently only going to be 4% when assessed against an entire CPZ (comprising some 2,091 'spaces') but the real impacts will be felt at a local level, i.e. the Riverside area or the so-called Inner Sub-Zone area. Only one of the 28 new CPZ spaces being created is within the Riverside area, and it is on Church Lane in an area which is prone to flooding.

19. The Richmond Parking Survey Methodology states that when looking at the parking impact of a proposal to a particular site (in this case, EPI), the extent of the survey area must be 200-metres. This is the widely regarded industry standard measurement of how far residents may want to park from home.

20. If the footbridge on the mainland is the starting point, a 200-metre area roughly covers The Embankment, Water Lane, Wharf Lane, and Church Lane. According to the Council's data in Appendix A of the report to committee there are 114 parking spaces in

this area, this includes the planned reclassification of these parking spaces to resident permit holder bays.

21. If all 82 parking bays are removed from this area, and one more is added to Church Lane, there will only be 33 parking spaces left within a 200-metre walking distance of the EPI footbridge. This represents a 71% loss of parking spaces within the 200-metre area.
22. According to the Council's data in Appendix A of the report to committee there are 76 cars parking in these roads (The Embankment, Water Lane, Wharf Lane, and Church Lane) overnight which can be reasonably assumed to be the demand generated by residents/resident permit holders in the Riverside area. 76 cars attempting to park in 33 parking spaces equates to a parking 'stress' of 230%. The Council's own parking survey methodology states as follows regarding acceptable parking stress thresholds:

"LBRuT will consider appropriate extant planning permissions in the area and if stress levels are calculated at 85% stress or more LBRuT will raise an objection on the grounds of saturated parking, highway safety and undue harm to neighbour amenity."*

23. There will be a shortfall of 43 parking spaces in these streets which will be displaced and will need to be accommodated elsewhere nearby. There is some spare capacity in Church Street and Riverside, both of which are outside of a 200-metre walking distance of the EPI footbridge (i.e. a reasonable walking distance as defined by the Council). However, the furthest parking spaces on Riverside from EPI extends some 650 metres away and this road is prone to flooding and is therefore undesirable and completely impractical for EPI residents. Only 8 cars park in Riverside overnight according to the Council's data. These are likely to be residents of Riverside who have direct frontage to Riverside and can move their cars quickly and reactively to flooding, unlike EPI residents.
24. It is unrealistic and harmful to the safety and the amenity of EPI residents to expect them to park further afield, such as on the roads to the north of King Street and to the west (Cross Deep, Poulett Gardens etc), which is effectively what is being asked of them through this parking consultation. Paragraph 4.2 of the report to committee confirms as much, albeit from a revenue perspective rather than a resident safety and amenity perspective:

“4.2 The impact on parking from the removal of the 82 parking spaces is anticipated to be fully offset by vehicles parking elsewhere within the CPZ and/or in the town centre car parks and is therefore expected to have no financial impact.”

25. The proposals will result in saturated parking, highway safety issues, and undue harm to neighbour amenity in the Riverside area and therefore the Council's Highways Officer should raise an objection to the proposal on this basis.
26. The formation of a D I sub-zone is unlikely to resolve this issue and has not been explored in any further detail in the planning application documents.
27. Whilst EPIA have been in regular contact and have had discussions with the Twickenham Riverside Development Team in the months leading up to the planning application, these discussions have been constrained to access, servicing, and parked-up servicing. We have not been allowed to discuss parking as a separate issue with the Development Team, 'as it is the subject of a separate consultation'.
28. In paragraph 3.22 the Council acknowledges that it does not know the true impact of the loss of 82 parking spaces around The Embankment area:

“In summary, the parking proposals developed to date seek to address the displacement of the removal of 82 parking spaces around The Embankment area. The true impact of the removal of the spaces is not known at this time as the Council works towards a resolution in this matter. The finalised proposals will be implemented by way of Experimental Traffic Orders which provide a period of operational experience and a statutory consultation period of six months along with an option to make early modifications if required. It may be necessary through future reviews over time to make further changes as the CPZ and car parks fully adapt to the removal of the spaces on The Embankment.”

29. In our view an assessment can be reasonably made at this time as to the likely impact of the removal of such a large number of utilised parking spaces from a concentrated area. In our view, based on the Council's own data contained in the report to committee, the impact will be severe.
30. If the planning application is granted planning permission these parking spaces will be lost forever, how can the Council make any meaningful modifications to address the

potentially significant issues which are expected to arise (i.e. redress the expected shortfall in demand of some 43 parking spaces in the Riverside area)?

31. Paragraph 6.2 of the committee report sets out several factors listed in the Road Traffic Regulation Act 1984, that a local authority might consider relevant when implementing controlled parking zones, specifically:

- free movement of traffic; It is our view that there will be a detrimental impact to free movement of traffic in this area as a result of the proposals, especially if movement of large vehicles is not allowed along The Embankment.
- access to premises; It is our view that access to the premises on Eel Pie Island will be materially harmed by these proposals.
- availability of off-street parking. Eel Pie Island is a traffic free island, off-street parking is not an option, and the parking spaces on the Embankment are a vital resource. The alternative provisions for on-street parking are inadequate, and the locations of other new and existing off-street parking to serve the island's parking needs are too far away to be reasonable or practical.

SUMMARY

32. To summarise, for the reasons laid out in this Note it is considered that the planning application is currently in contravention to the following material policies:

- Richmond Council's adopted Local Plan – Policies LP 18 River Corridors, LP 44 Sustainable travel choices, and LP 45 Parking standards and servicing.
- The London Plan (March 2021) – Policies T2 Healthy Streets, T4 Assessing and Mitigating Transport Impacts, and T7 Deliveries, Servicing, and Construction.
- National Planning Policy Framework (updated July 2021) – Paragraphs 110 parts 'b' and 'd', 111, and 112 parts 'a', 'c', and 'd'.