

The Twickenham Riverside Redevelopment scheme must not be seen in isolation from Eel Pie Island we are its neighbours and all our access is via the site.

We are highly concerned that the current Hopkins Scheme does not meet the needs of our Community and that the Council is at risk of delivering a proposal that does not comply with the design brief, and will have significantly impact on the everyday lives of the Eel Pie Island Business, clubs and residents that are dependent on the infrastructure of the Embankment road, Water lane and Wharf Lane.

The Stakeholder meetings have not been the platform for detailed discussions (about existing service, access and parking requirements.) Despite numerous attempts by Eel Pie Island Association to have direct meetings with the Project officers, they have not happened yet and we are left with believing that the architects did not have essential information to ENSURE that the islands unusual access and servicing arrangements are fully understood and appropriately accommodated. As per the design brief pages 2-3

The council states in the report for this meeting that the redevelopment of the site will benefit the residents and businesses without mentioning the impact on the EPI Businesses and residents although the design brief states the thriving economy of the Island should not be disadvantaged. (pages 2-3)

The overall site plan on page 9 showing movement , access and servicing and loading bays for Eel Pie Island Community are not adequate. There are continual vehicular movements consisting of vans, lorries and HGVs with steel/timber/bottled gas for the working boatyards taking place throughout the working week (Pages 12-18)

The circulation proposed (page 9) will give a view being dominated by vehicles turning around and queuing with 2 way traffic up Water lane . Even if indeed the vehicles are able to turn and return up Water Lane and get under the proposed service road tunnel link. It is bound for traffic to back up Water Lane and impacting on the towns flow along King Street.

This is not visible in the Hopkins computer generated pictures (page 8 ) The general public and wider community are not being shown a true or realistic picture

We ask you to revisit the Twickenham Area Action Plan Inspectors Report May 2013 regarding the deliverability of a scheme that would remove the infrastructure and highlights the importance of these for the Island. It recognizes the strategic significance and recommends the use of Core Strategy protection policies., so the current riparian uses can still exist (pages 4-6)

The highways authority have already undergone some work on parking and access etc, we have concerns as to methodology in particular the placing of camera that miss the lorry unloading spot at the bottom of Water Lane.( see page 7).

We want to meet up with the Council , the Architects, we want to have detailed discussion so the redevelopment of Twickenham Riverside is feasible, practical and solutions can be found together.

Helen Montgomery-Smith  
EPIA

Eel Pie Boatyard, Eel Pie Island

8th April 2020

Dear Paul and the Twickenham Riverside project team,

Thank you for your time last Wednesday. In these exceptional circumstances, it was very much appreciated. As discussed we write to share our thoughts ahead of the proposed parking consultation with local residents in the next 6-8 weeks. Our discussions on Wednesday centered primarily around servicing and we confirm the EPIA will be writing separately about the Embankment parking.

We appreciate your acknowledgement that there is still “a lot of work to do” on the servicing-related aspects of the Hopkins concept and we would like to take you up on your offer to meet with them following their meeting with Highways in the next 2-4 weeks.

I summarise the EPIA feedback on the Hopkins concept scheme:

- Servicing of large vehicles

Any servicing provision for Eel Pie Island needs to accommodate both 10m fixed-based vehicles and 15.5m articulated vehicles.

This is not solely to accommodate deliveries of steel and timber, amongst other materials, to the island’s boatyards, but also to facilitate the day-to-day function of the wider island. Larger domestic/business deliveries and waste collection are key amongst these. Emergency vehicles being able to come alongside the island also need to be accommodated effectively.

It is of particular concern to the island that the Hopkins concept shows a reduced-width Embankment road at the corner of Water Lane. Movement of the larger vehicles as will be compromised as a result.

- Increased loading/unloading activity

Any removal of parking (currently a net loss of 64 places) from the Embankment would inevitably result in increased loading/unloading activity: island residents would be parking alongside the island to load/unload where previously they would have been able to load/unload from their parked-up vehicles.

- Parked-up activities

Tradespeople, health workers, utility workers, for example, would be seriously impacted. The existing 76 parking bays within the development site provide parking for this ‘servicing’ activity. Where previously a parking place could be found on the Embankment, in the Hopkins concept, it will be highly unlikely a place would be available on the Embankment, with the nearest car park being off Church St. This is a considerable distance, bearing in mind that many of

the tradespeople need ready access to their vehicles and one has to also then factor in the additional distance from the Embankment to the various reaches of the island.

We therefore submit that additional bays need to be provided for this activity. Parking for 'parked-up' servicing activities could be limited to Eel Pie Island. Special 'servicing permits' could be issued to EPI residents/businesses accordingly.

- Servicing bays  
'Loading bays' could be termed as 'servicing bays' to reflect the proposed change in circumstances, more accurately describing their function within the context of the proposed riverside development. They need to fulfil a broader function than the existing loading bays.

The existing 3 bays need to be somewhere in the region of 8-10, reflecting their wider remit.

If only loading/unloading operational hours should remain as per existing loading bays i.e maximum stay of 1 hour, but in operation 24 hours day, 7 days a week

If parked up servicing is taking place then it would require the flexibility of all day.

One could consider a Monday-Friday v. a Saturday-Sunday use of these servicing bays, with parked-up servicing could be limited to Monday-Friday, and size restrictions regarding larger vehicular access put in place at weekends.

Weekend servicing is very relevant to both the Twickenham Rowing Club and the Richmond Yacht Club. Both these clubs rely on weekend functions for their financial viability. The Rowing Club, for example, does not have storage space on site for the tables and chairs for its large event space and these need to be brought on and off island for each event.

- Loading Bay location  
The loading bays have been moved to an area (the Embankment 'basin') that is frequently affected by high-tide overflows: the proposed loading bays would be affected by c.35-40% of all high tides, whilst the existing loading bays are affected by less than 5% of all high tides.
- Yellow line' servicing  
An important aspect to servicing Eel Pie Island is the current 'yellow line' servicing. How this would operate, or what it is replaced by, is not described in the Hopkins design. This is likely to have been compromised as the width of

the Embankment road at the corner of Water Lane has been narrowed in the Hopkins design.

- Water Lane – Service Lane junction

We acknowledge you are already considering how large vehicles will exit the Embankment area via the proposed service road, from Water Lane and then the turn into Wharf Lane. The corner from Water Lane into the service road would appear to have a c.6m turning radius, when a 10m one is required for the size of vehicles that service Eel Pie Island. In addition, the access to the service road will need to have sufficient height clearance to accommodate not only the vehicles that service Eel Pie Island, but also those that will service King Street and any proposed development.

- Town Quay (at the bottom of Church Lane).

There was discussion of how the Town Quay (at the bottom of Church Lane) is currently used, and if its use could be expanded such that deliveries currently being made via the island's bridge could be made via the Town Quay instead.

Eel Pie Slipways Ltd currently use the bridge and trolley to enable the steel to be brought over and stored at the land end of the slipways next to the hoists and machinery, rollers for bending cutting the steel before being welded onto the large vessels.

Increased use of the parking spaces in the Town Quay area of the Embankment. Servicing as currently takes place (very large timber deliveries, engines, rubbish skip delivery/removal) may well be compromised due to the increased presence of parked vehicles.

The Town Quay is also used extensively by the Twickenham Rowing Club. Its two large boat trailers park there when not being used to attend year-round competitions: boats are regularly loaded and unloaded in this area, having been boated over from the club and brought up the slipway.

- Servicing Data

You mentioned the various surveys that have taken place, and that the more recent surveys (July 2019 and March 2020) used more cameras than the previous surveys, thus eliminating the Embankment 'blindspot' of the previous surveys. We would be very interested to see the reports generated from these more recent surveys, to compare them with the results of the previous surveys where data was gathered with less optimally positioned cameras. We understand that this is work you are already undertaking.

The EPIA has 2 full weeks of 'yellow line' servicing footage, covering a week in November 2017 and a week in June 2019. Please confirm which week's footage you have already seen, and we will be very happy to provide the

other. Whilst this is data that you yourselves have not collected, you expressed a willingness to feed it into the process for consideration.

We all agreed that no information would be collected during these times of covid 19.

- Additional informative documents  
Something that we did not touch upon was that, as part of the competition brief, the architects were directed towards certain informative documents: the TAAP (and by extension the Inspector's Report that informed it) and the LBRuT Local Plan. We would like to add to that list: the London Plan and the PLA's framework for development entitled Thames 2035. For your ease of reference, we have reproduced certain sections below. We suggest that all need to be taken into careful consideration when looking to make changes to the existing Embankment/Island 'ecosystem'.

Thank you once again for your time on Wednesday. It was clear, though, hearing from the various officers on the call, that the Hopkins design is very much an early concept, that much will need to change and that there is the willingness, going forward, to engage in meaningful dialogue to ensure that the island as a thriving place to both work and live is not adversely impacted by any redevelopment.

We look forward to hearing from you as to the timetable for the next steps.

Kind regards,

Helen Montgomery-Smith

Chair, Eel Pie Island Association

## TWICKENHAM AREA ACTION PLAN

- 7.5 Twickenham Riverside and Approaches

7.5.2.3 The visual amenity and significance of Eel Pie Island [...] are part of the character and function of this part of Twickenham, and the impact of the proposals in the TAAP must be given due consideration

- 7.5.3 Transport Proposals in Twickenham Riverside and Approaches

7.5.3.1 New traffic management arrangements [...] provided that the function of the working waterfront would be maintained [...]

Provision for servicing Eel Pie Island [...]

- 7.5.4 Environmental Proposals in Twickenham Riverside and Approaches

7.5.4.2 Rearrangement or possible reduction of parking along the Embankment, provided that the function of the working waterfront would be maintained.

Shared surface with the retention of service access [...]

- 7.5.5 Proposal Site TW& Twickenham Riverside

7.5.5.2 Key objectives:

to maintain the Embankment as a working quay [...]

### THE TAAP INSPECTOR'S REPORT

13. I identify a need in the AAP for it to attach importance to the Twickenham Embankment as a working waterfront which supports Eel Pie Island and its uses.
23. Twickenham Riverside is a unique location having regard to the proximity of Eel Pie Island with its working boatyards [...] I have reason to believe that the Council's detailed proposals for this area cannot be justified [...].
34. [...] it is essential the Council attaches a high level of importance to meeting the parking needs of the Island residents and businesses in order to maintain the vitality and viability of the working waterfront
56. [...] CS Policy CP11 seeks to protect and enhance the natural and built environment and the unique historic landscape of the River Thames corridor, and to protect and encourage river-related industries. [...] that part of the Embankment with TW7 is closely related to the activities on Eel Pie Island, and any change to its functions must take into account the potential impact on the activities on the Island in accordance with the CS policy.
57. There is potential for improvements to be made to the environment of the Embankment, but these should not be at the expense of its functional relationship with the working waterfront and the Island. [...] a reduction in parking places would only occur if it is clear that the function of the working waterfront would not be undermined.

### LBRUT LOCAL PLAN

Page 30:

The Council will continue to protect river dependent facilities, such as boatyards and sheds, public and private wharves, slipways, wet and dry docks

and cranes, piers, pontoons, jetties and stairs essential for the survival of river-related industry and to support the continued active use of the river.

Page 31:

The Council protects the existing river-related industrial and business uses. In addition to their functional roles, river-related uses make an irreplaceable contribution to the character and contrasts of the individual reaches through the activity, distinctive building forms, varied visual interest and historical link they provide.

## THE LONDON PLAN

### Chapter 7: London's Living Spaces and Places

7.15 The Blue Ribbon Network has significant cultural, historic, economic and environmental value to local character. [...] Building and spaces should be designed to activate the Blue Ribbon Network in a way that is appropriate to its character, infrastructure value and heritage significance.

- POLICY 7.24 of the London Plan defines the Blue Ribbon Network (BRN) as:

a strategically important series of linked spaces. It should contribute to the overall quality and sustainability of London by prioritising uses of water space and land alongside it safely for water-related purposes, in particular for passenger and freight transport.

Policies 7.25, 7.26, 7.27, 7.28, and 7.29 relate specifically to the Blue Ribbon Network and the River Thames.

- POLICY 7.25 INCREASING THE USE OF THE BRN FOR PASSENGERS AND TOURISM

Strategic: The Mayor will seek to increase the use of the Blue Ribbon Network for passenger and tourist river services [...]

- POLICY 7.26 INCREASING THE USE OF THE BRN FOR FREIGHT TRANSPORT

Planning decisions: Development proposals [...] adjacent or opposite safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance

para 7.79 Appropriate highway access to wharves for commercial vehicles needs to be maintained when considering proposals for development of neighbouring sites.

- POLICY 7.27 SUPPORTING INFRASTRUCTURE [...]



Planning decisions: Development proposals [...] should protect and enhance waterway support infrastructure such as boatyards, moorings, jetties and safety equipment etc. New infrastructure to support water-dependent uses will be sought.

para 7.80 In order to make the maximum use of the Blue Ribbon Network, particularly for effective transport, a range of supporting infrastructure is required. The infrastructure includes, but is not limited to; boatyards, jetties, moorings, slipways, steps and water side paths/cycleways. Their need and provision should be assessed by local authorities.

para 7.83 The promotion of the use of the Blue Ribbon Network for leisure facilities is an important objective. Water provides opportunities for particular types of leisure and sporting activities such as rowing, canoeing and sailing. Water-based sport and recreation should be prioritized and facilities that enable or enhance these activities should be supported.

#### THAMES 2035 (the Port of London Authority's framework for development)

- 4.3 Passenger transport

The 20-year vision will see double the number of people travelling by river - reaching 20 million commuter and tourist trips every year.

To achieve this goal [...]. we have set the following priority actions: [...]

5. Secure the infrastructure required for growth in the transport of passengers and goods on the Thames. An increasingly busy river will require additional infrastructure. Investment will be needed in boatyards.

- 4.4 Sport and Recreation

The 20 year vision will see greater participation in sport and recreation on and alongside the water.

- 4.6. Community and culture

Eel Pie Island Association  
27th May 2020

Dear Charles

Thank you for arranging the meeting on the 20th May. We were able to discuss the timeline for the project, and the opportunities for the EPIA and other stakeholders to contribute to the emerging designs.

Please see below for a summary of the meeting.

Present:

EPIA: Colin Heath, Helen Montgomery-Smith

LBRuT: Charles Murphy, Nick O'Donnell, Mick Potter, Anna Sadler

WSP: Tim Edwards, Tom Gabbittas

The following timeline emerged from the meeting:

- a. Before end of May 2020: a full set of consultation plans will be available for the EPIA to view.
- b. June 2020 - 4-week parking consultation of all Zone D residents.
- c. September 2020 - recommended changes to Zone D to the Transport Committee.
- d. October 2020 - public consultation on the full development proposals.
- e. January 2021 - planning application.

## PARKING CONSULTATION

The final report on the traffic survey of the Embankment area in March 2020 had only just become available at the time of the meeting and its contents were not discussed.

*[It would be very useful for the EPIA to have sight of this survey. Would you please confirm that you will be able to send us a copy of this report as you have done for previous surveys.]*

Content of consultation - the council was able to confirm that this will be largely (95%) aligned with the presentation to the SRG in August 2019.

It was indicated that the consultation will also show how it is planned to accommodate the servicing for the island.

With the consultation in mind, the EPIA made the following observations:

1. The proposed new spaces created within the CPZ are largely in the NE, in an area where on-street parking is already highly stressed. A “shuffle up” will not happen. Rather, these spaces will be absorbed by residents of the immediate area, with the result that many residents displaced from the riverside will have no option but to use Holly Road Car Park.
2. 15 spaces on the Town Quay and on Riverside were mentioned (see attachment). These are affected by high-tide overflows for about 40% of all high tides. Residents and locals avoid these spaces accordingly. They are not a viable replacement for resident spaces lost from the Embankment.
3. The further away that parking is displaced from the riverside, the greater the number of loading/servicing bays that will need to be provided adjacent to/opposite the bridge.

The multi-storey Aragon Road Car Park was mentioned by the council as being an option for tradespeople’s vehicles. Bearing in mind that this is some 400m on foot from the Eel Pie Island Bridge, and then it’s 200-250m on average to an island location, this is clearly not feasible.

4. The removal of Pay and Display parking from the Embankment will impact the servicing of Eel Pie Island. See below for more detail.

## SERVICING OF EPI

It was re-stated at the meeting that any changes to the servicing arrangements to the island need to ensure that existing servicing can be accommodated, whether this be loading or parked-up servicing, supporting not just residents but also the clubs and businesses, and especially the boatyards. Practicality of servicing to ensure the viability of the island was stressed.

Detail about the workings of the various boatyards was provided: timber and steel deliveries, amongst other frequent, smaller deliveries; the size of craft that the slipways can accommodate; specialists required on site who often come with their own substantial equipment.

In terms of parked-up servicing, accommodating approximately 5-10 servicing vehicles/day was discussed, in addition to loading activities. This former is currently accommodated by flexible mixed-use Resident/Pay and Display Embankment parking.

Any proposal would also need to provide sufficient space to allow large vehicles to enter, service and then leave the Embankment area alongside the EPI bridge safely.

The EPIA has already provided comprehensive photographic reference material of larger vehicles servicing the island.

WSP (Tom/Tim) stated that a scheme that had the flexibility and sufficient space to accommodate different demands (loading, servicing) would be key.

*[Post meeting note:*

*An aspect of 'servicing' that was not mentioned in this meeting, but has been mentioned in previous meetings, is that of accommodating emergency response vehicles. Just this week, the London Fire Brigade (LFB) conducted an emergency response exercise on the island, as indeed it does on a fairly regular*

*basis. There have been two major fires in the past 25 years, both of which resulted in full island evacuations. Due to the unique logistical challenges of fire fighting on the island, LFB's minimum response is for at least four, but most likely six, appliances attending any reported fire, with more emergency response vehicles in attendance in the event of an evacuation. The EPIA has contact details for the local LFB Watch Commanders if WSP wish to liaise directly regarding this.]*

WSP will also be exploring how to reduce the impact of servicing at times of high visitor activity e.g. weekends, Bank Holidays etc. It was pointed out, however, that weekend servicing (catering companies, furniture hire, entertainment systems etc) is important to both the Rowing and Yacht clubs, both of which regularly host private-hire events to underpin the clubs' riparian activities.

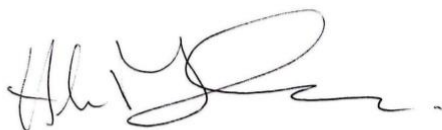
EPIA has contacted the Richmond Yacht Club and Twickenham Rowing club regarding frequencies and timings of events for the clubs and the information will follow in due course.

WSP stated that servicing proposals will show the movements of the largest vehicles that service the island.

WSP indicated at the end of the meeting that they now had a much clearer idea of the servicing requirements of the island. In order to understand, in more depth, the island's requirements, a site meeting in the very near future with the EPIA was suggested by the council.

Thank you once again for what was hopefully a productive meeting, and we look forward to hearing from you about (a) the March 2020 survey and (b) a date for the site meeting with WSP and the team.

Best wishes

A handwritten signature in black ink, appearing to read 'Helen Montgomery-Smith', with a stylized flourish at the end.

Helen Montgomery-Smith  
EPIA Chair

## **EPIA Meeting Notes of Workshop meeting with Council and WSP held 02 December 2020 following on from discussions arising from 18 November 2020**

### **Parked up Servicing**

- EPIA suggested locations were circled during the meeting directly on to the presentation slides by WSP.
  1. Next to the bridge extending the loading bays and having parked up servicing in that line.
  2. Opposite bridge in the current business permit bays
  3. Wharf Lane next to the Thames Eyot Boat house wall
  4. Wharf Lane to the west of the proposed building
  5. Water lane on the east side. This was a suggestion from the council.
- The number of bays were not directly agreed but the concept of possible locations, for the council to discuss with their members and the recognition that parked up servicing bays is a need for the everyday functioning of EPI.
- EPIA mentioned the need for up to 12 parked up servicing bays.
- Council to develop a strategy so the parked up servicing bays could be managed so they could not be abused.
- Discussion between parked up servicing and loading next to bridge and the associated vehicle tracking for the 2 way flow up Water Lane
- EPIA suggested that all larger vehicles using the parallel servicing areas could exit via The Embankment Monday to Friday to ease circulation. The council said that they would ask the rest of their team but said that they had only just managed to get agreement for the articulated lorries and the very large vehicles servicing EPI.

### **Loading Bays**

- WSP said the loading bays by bridge would have some sort of landscaping or bollards so that unloading takes place on the road side without compromising the pedestrian access on the River and promenade area.
- WSP explained the design has been adjusted so the identified pinch point for pedestrians has been rectified. (Between the bays and the bridge)
- Clarification of cycle routes was not shown on presentation slides and will be in the further detail of the design. EPIA expressed concerns that cyclists should be steered well away from the identified pinch point.

### **Safety Audit**

- Reassurances were given to EPIA were given that the fire hydrant access point and the BT and service duct will be given due attention and accessible during development work.

### **D1 Parking Zone**

- EPIA suggested a new D1 parking zone. The council thought the idea as a positive step.
- D1 permits could be limited to residents of Water Lane, Bell Lane, EPI and the Embankment. It would not include King Street and Church Street.
- D1 would need to be able to park in D as in times of high tide/fluvial surge most of the area can be subject to flooding. Access to the area is regularly blocked by flooding at the bottom of Water Lane and now that Church Street is pedestrianised the Church Lane/Bell Lane option for access has been removed. Even more often the access to Riverside via Church Lane is cut off by the tide.
- There would be no reason for D permit holders to come down Water Lane to see if there were spaces hence further reducing traffic in Water Lane.

- EPIA to send suggested D1 Area (Wharf Lane to Riverside up to and including Flood lane car park) with possible timings but very much up for draft and further conversations. This could allow continued use of parked up servicing bays during the weekends to enable the functioning for the Island clubs and their weekend events.

#### Next steps

- WSP and Council to take suggestions then and come back to EPIA with possible solutions.
- Council suggested another meeting date possibly before Christmas 2020.
- Council informed the meeting that any adaptations would not be presented to the next SRG group as all the boards have already been completed.

Helen Montgomery-Smith

EPIA

(shown: map of Zone D CPZ)

**NOTE:** residents of proposed new development would not be permitted to obtain D1 parking permits.

Current active Zone D permits in proposed D1: **86**

D1 spaces: **72**D1 spaces liable to regular flooding: **15**Shortfall: **14-29** (depending on tide)

**D1 CPZ:** all parking D1 permit holder only

- (1)** D1 permit holders can park in Zone D, but D permit holders cannot park in Zone D1

**NOTE:** this is as per existing S/S1 CPZs

- (2) D1 operational hours:**  
Mon-Sat: 8.30am-midnight  
Sun + Bank Holidays: 11am-5pm

- (3) Church Lane CP + York House CP:**  
D1 permit holders can park for free 8.30-9.30am  
and 5.30-6.30pm

**NOTE:** (2) and (3): as per A1 (central Richmond)



**Meeting preparation for Council and Twickenham Riverside team.  
Wednesday 3<sup>rd</sup> March 2.00-4.00pm**

**EPIA Proposal - Feb 2020**

**Access and Traffic Circulation**

- Monday – Friday 7.00am – 6.30pm bollard open able with EPI representative taking control.
- Large vehicles using yellow line servicing to safely egress using bollards.
- Vehicles stranded by tidal flooding at the bottom of Water Lane to safely egress using bollards.
- Weekends bollard closed except for emergency access or articulated lorries servicing the shops.
- Independent safety audit to be carried out once the lock down is over and the businesses, clubs are up and running again the current situation is not representative.

**Loading**

- Larger vehicles Loading to take place on yellow lines by the embankment loading steps, and on corner of Water Lane/Embankment Junction.
- 3 loading bays next to the bridge for Smaller vans/small trucks (as existing)
- Dispensation of up to 40 minutes for loading /unloading before ticket.

**Servicing and Dedicated Bays for Parked up Servicing**

- 5 Parked up servicing spaces next to Eel Pie Island Bridge
- 10 Parked up servicing spaces on Wharf Lane
- Dedicated spaces that can only be used in a similar way to the current visitor parking permit scratch cards that enable.
- For the boatyards they must enable sub contractors, boat surveyors, specialist engine mechanics, fire safety and protection audits etc.
- Any service visitor's tradesperson or carer to all businesses residents and clubs to be able to park for extended periods from 1 hour to full day as needs are required.
- Eg Caterers to the clubs, band equipment for musicians for club events etc. especially in evenings.
- Timings would have to include an evening period 5.00pm-12.00am to enable evening events on the Island or in the Twickenham Riverside Area so that bays could not be parked in by D1 permit holders.

**Parking Proposals**

- D1 permits could be limited to residents of Water Lane, Bell Lane, EPI and the Embankment. It would not include King Street and Church Street.
- D1 would need to be able to park in D as in times of high tide/fluvial surge most of the area can be subject to flooding. Access to the area is regularly blocked by flooding at the bottom of Water Lane and now

**Meeting preparation for Council and Twickenham Riverside team.**  
**Wednesday 3<sup>rd</sup> March 2.00-4.00pm**

that Church Street is pedestrianised the Church Lane/Bell Lane option for access has been removed. Even more often the access to Riverside via Church Lane is cut off by the tide.

- D1 Area (Wharf Lane to Riverside up to and including Flood lane car park)
- Possible timings 08.00-midnight Monday-Sunday for D1 permit holder parking.



PAUL MEW ASSOCIATES  
TRAFFIC CONSULTANTS 020 8780 0426

EPIA MEETING NOTES – 3<sup>rd</sup> MARCH 2021

Date:	16 <sup>th</sup> March 2021
Subject:	Twickenham Riverside - EPIA Meeting 3 <sup>rd</sup> March 2021 14:00-16:00

**Attendees:**

**EPIA**

Helen Montgomery-Smith

Helen Little

Colin Heath

**PMA**

Nick Ferguson

**HOPKINS**

Chris Bannister

**WSP**

Tim Gabbittas

Tom Edwards

**LDA**

Tim Wilson

**PLA**

Michael Atkins

**LBRuT PROJECT TEAM**

Charles Murphy

Anna Sadler

**LBRuT TRAFFIC**

Nick O'Donnell

Mick Potter

**General Points of Note:**

The EPIA felt that the meeting was positive overall. However, there are still areas where a more detailed response is required. Accordingly uncertainties remain.

WSP's commitment that any changes made as the scheme moves towards a planning would not be a step backwards in terms of Eel Pie Island's servicing was welcomed.

It was similarly encouraging to hear from the Council that priority is being given to the existing businesses and residents of the area.

EPIA share the PLA's view expressed in the meeting that there will still be the requirement to have Embankment access and that the management plan and the process for that needs to work properly for everybody.

The recognition that the traffic scheme will need to be kept under review is also welcomed. This is a major change for the area and many unanticipated consequences may well arise. The EPIA's understanding of the proposals discussed is that there will be:

- Six, or potentially seven, marked bays to the west of the bridge of which three will be loading bays and three will also be available for parked-up servicing.
- Three parked-up servicing bays in Wharf Lane.
- All these parked-up servicing bays are for island use and are not to service the development.
- The possibility of further bays at the southern end of Water Lane dependent on the final location of the ice cream van.
- Single yellow lines along the northern side of the Embankment to the west of Water Lane, along the bottom of Water Lane and along the river edge by the slipway.
- Continued work on the D I parking zone.

#### **Road Safety:**

There remain serious safety concerns about large vehicles reversing in the area at the bottom of Water Lane. The recent event of a swan being killed by a reversing SUV highlights these concerns. It could easily have been a lorry and a child. The slipway is hugely popular for children feeding the waterfowl and birds. The scheme introduces the new risk of large vehicles reversing and the safety audit will need to be rigorous in this respect. The more reversing can be minimised, the less the risk. Concerns were also raised about the interaction between cyclists and manoeuvring vehicles in this area.

There are other points in the scheme with potential safety issues such as the junctions of Water Lane and Wharf Lane with King Street.

#### **On-going Review of Traffic Arrangements:**

The proposed changes to traffic patterns in this area are fundamental and the EPIA, therefore, welcomed the commitment to keep them under review.

The impact the proposed changes will have on the servicing of the island will need to be monitored.

#### **Further Surveys:**

The EPIA supports the undertaking to conduct further traffic surveys of area. Covid has potentially changed usage of the area and decisions should be based on activity in a post-Covid situation.

Anecdotally, parking pressure in the area has increased during Covid. This, of course, may decrease after lockdown rules are relaxed but it may not if attitudes to public transport have been significantly changed. It will be important to establish the post-Covid baseline.

#### **Traffic Along the Embankment:**

The system controlling traffic along the Embankment needs to be flexible.

Unlike a supermarket, businesses on the island receiving deliveries cannot control their supply chain. The system will need to be able to accommodate different delivery times. There is a distinction between use on weekdays and use on weekends, when demand is likely to be reduced.

It is understood that the methodology for this control has not been finalised but it will need to be able to react to short-notice requirements. The mechanism must work flexibly to ensure that island businesses, especially the boatyards, can continue to operate. It must allow for emergency use.

#### **DI Parking Zone:**

EPIA look forward to the conclusions of the work on the DI Zone and to discussing this with the Council soon.

#### **Two-Way Working in Water Lane:**

While it is recognised that proposed limited servicing of Water Lane retail units from Water Lane is still under consideration, concern was raised about the effect of this on traffic flow along Water Lane.

#### ***Post Meeting Note:***

*On 18 March the Traffic Committee is being asked to authorise the permanent pedestrianization of Church Street. The accompanying report notes the recent introduction of a loading bay at the top of Water Lane to allow the servicing of Church Street during its daytime closing.*

*This appears to conflict with the plans for Water Lane discussed in the context of the proposed development.*

#### **Parked-Up Servicing:**

The EPIA would like to continue to contribute to the consideration of the size and location of the parked-up servicing and loading bays.

It is essential that the timings on these bays accommodates both day and evening activity on the island.

Those outlined above are welcomed but represent minimum provision of this vital infrastructure.

#### **April Meeting:**

The EPIA looks forward to the proposed meeting in April. An indication of when this will take place would be appreciated.

## EPIA – Feedback notes to the committee on meeting held 11/05/21 with Twickenham Riverside Development Team

### Attended

EPIA – Helen Little, Colin Heath and Helen Montgomery-Smith,

PMA- Nick Fergusson (traffic consultant)

LBRUT – Anna Sadler, Mick Potter (Traffic and Highways), Nick O'Donnell (Parking), Charles Murphy

WSP – Tim Gabbitas, Tom Edwards (Transport Design Team)

Hopkins- Chris Bannister , Rea Turohan (Architects)

PLA- Michael Atkins

### Proposals

- 3 loading bays by Eel Pie Island Bridge
- 3 parked up servicing/longer term parking next to the loading bays by the bridge.
- 3 parked up servicing/longer term parking on Wharf Lane (subject to change may have to be moved from the position but will be incorporated in to proposal)

### Circulation

- Use of Water Lane 2-way with passing spots between the 2 accessible parking bays proposed along Water Lane.
- Use of Wharf Lane 2-way with a designated turning area at the bottom on the Embankment/Wharf Lane Interchange.
- New design layouts include the turning of an HGV at the bottom of Water Lane
- Use of bollards and vehicles passing across the Embankment - restricted to certain times and verbal assurances that there will be access for large vehicles only. Unclear as to how the bollards will be opened, possibly a 24-hour camera with a Careline phone number.

### Servicing

- Use of the yellow lines on the North of the Embankment Road for Larger Box Van and Flatbed Rigid Lorries eg. Steel delivery- boatyards Flat bed – Curtain sides used for timber etc.
- Use of Yellow lines next to River/loading steps

### Safety Audits

- Safety audits have not taken place regarding the turning circle at Water Lane/Embankment. EPIA were verbally assured will take place prior to planning application

### Further Parking Surveys of the wider Area

- It was felt that they had enough information pre COVID

### Parking

- 3 pay and display parking spaces to be retained next to the grassy knoll.
- Parking report and recommendations are currently being drawn up to go to the Transport and Air Quality Committee meeting on Tuesday 15<sup>th</sup> June.
- It was not clear whether the D1 proposal was going to be put forward.
- EPIA indicated that they would be attend the meeting – the report will be ready for public to obtain on 8/9<sup>th</sup> June

EPIA – Feedback notes to the committee on meeting held 11/05/21 with  
Twickenham Riverside Development Team

**Comments**

- The design team indicated that they had some sympathy for the Monday-Friday recognition of the Embankment Road is different to weekend use
- High tide use of the Embankment and having a system that EPI would be able to have flexible control of the bollards.
- Safety for cyclists- there is no designated cycle path. Vehicles turning at the bollards and the blind bend in the road and people carrying canoes and paddle boards makes visibility difficult.
- LBRUT indicated pressure from the Stakeholders to close the Embankment road completely that cannot be changed even if there is a change of administration.
- LBRUT assured the road would have to remain.

Helen Montgomery-Smith

**We need road infrastructure for access and servicing.**

Our most pressing and major concern is **the safety of the other users** in context of the proposed two-way operations along Water Lane and Wharf Lane and the subsequent manoeuvring of large vehicles.

When talking about it people say “**what are they really proposing that large vehicles turn around at the bottom of Water Lane but that’s so dangerous what about the kids feeding the ducks**”

When you live or work on the Island you see how busy it can be, how quite often there will be 2-3 delivery trucks at a time along side the van. If it looks possible on paper to manoeuvre in reality we have huge practical safety concerns.

There is a large footfall of pedestrians at the area at the bottom of Eel Pie Bridge and the slipway/loading steps at the bottom of Water Lane.

We are also concerned about the safety of cyclists.

The possible cycle routes running down through the park to the intersection at Water Lane and the blind corner of Wharf Lane present possibilities of collisions/accidents .

We call for the Independent safety audit to be carried out once the lock down is over and the businesses, clubs are up and running again. The current situation is not representative and something so important as public safety must take priority.

**How can this committee make a reason judgment on the proposed changes without details of the safety audit?**

**Access, Servicing and Circulation.**

**We maintain that access along the Embankment provides a safe option for the large vehicles.**

Functionality is key and the Council needs to preserve and actively protect existing riparian businesses and clubs. A message should be coming across loud and clear that there is an essential need for some vehicles to pass across the Embankment and there always will be.

This will not dominate the setting because we not talking about a high volume daily/weekly. But to enable the safe egress of the large vehicles during the working week and during periods of high tides and when the river is in flood from rain water during the winter months.

In reality when you are running a business on the island you need to get on with taking the delivery, and then get it over the Island. It is not always possible to define the timing of deliveries

**.An EPI representative should be able to have some control over bollards.**



**At the moment these draft proposals do not provide safe and suitable access, parking and servicing arrangement for Eel Pie Island.**

**We urge the committee to recommend to wait until outcome of safety audits and traffic assessments and further consultation to those most affected by the changes before making a decision.**

**We ask is it right that the committee are even being asked to make these decisions for a proposal that is intrinsically linked to redevelopment and requires planning permission?**

Helen Montgomery-Smith

EPIA

15/06/21



PAUL MEW ASSOCIATES  
TRAFFIC CONSULTANTS 020 8780 0426

**PMA NOTES ON PARKING & SERVICING  
PROPOSALS FOR TRANSPORT & AIR  
QUALITY COMMITTEE 15-JUNE-2021**

Author:	Paul Mew Associates
Date:	11 <sup>th</sup> June 2021
Project:	P2172: Eel Pie Island
Subject:	Notes on Report to Transport and Air Quality Committee; 15-June-2021

Points of note to the EPIA in relation to the report to the Transport and Air Quality Committee on 15<sup>th</sup> June 2021.

1. The terms of reference of what the committee are being asked to support relate to updates to the parking proposals (already agreed in the November 2020 committee) along with access and servicing proposals for this area in relation to the Twickenham Riverside development. The plan at Appendix C of the report is a slight update to the WSP plan which we were presented at the last meeting with the design team on 10<sup>th</sup> May 2021.
2. The committee is being asked to support proposals for 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, with only a simple plan (Appendix C of the report) and no further context or details of a Road Safety Audit and proper traffic assessment. It is unclear whether this is good practice and how a reasoned judgment can be made by committee members.

4. Turning to parking, Paragraph 3.9 of the committee report 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”

5. This is a disingenuous assessment of the actual parking impacts that are likely to arise as a result of the proposal. Of course the impact of the loss of 82 parking spaces is 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.
6. The Richmond Parking Survey Methodology (appended to these notes) 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.
7. 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 there are 114 parking spaces in this area, this includes the planned reclassification of these parking spaces to resident permit holder bays.
8. 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.

9. According to the Council's data in Appendix A 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 local residents/resident permit holders in the Riverside area. 76 cars trying 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.”**

10. So 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.
11. It is unrealistic and harmful to 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:

**“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.”**

12. 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 once the planning application is submitted.

13. The formation of a D1 sub-zone is unlikely to resolve this issue.
14. The committee should be notified that, whilst EPIA have been in regular contact and have had discussions with the Twickenham Riverside Development Team in recent months, 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'.
15. 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.”

16. 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.
17. 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)?
18. In regard to access and servicing, the second bullet point to paragraph 3.25 appears to state that there is scope for occasional access along The Embankment for larger servicing vehicles such as those servicing EPI:

“The possible occasional provision for access along The Embankment for larger servicing vehicles such as those servicing the Eel Pie Island.”

19. This is a positive point, as it appeared that this would no longer be the case in our last meeting with the Twickenham Riverside Development Team.
20. Nonetheless, the point should be made that there remain serious safety concerns about large vehicles reversing in the area at the bottom of Water Lane. The slipway is hugely popular for children feeding the waterfowl and birds. The scheme introduces the new risk of large vehicles reversing and the safety audit will need to be rigorous in this respect. The more reversing can be minimised, the less the risk. Concerns were also raised about the interaction between cyclists and manoeuvring vehicles in this area. There are other points in the scheme with potential safety issues such as the junctions of Water Lane and Wharf Lane with King Street.
21. Without the benefit of a Road Safety Audit and proper traffic assessment of the scheme it is unclear how committee members can be asked to provide meaningful support to the access and servicing proposals in this area as set out in this report.
22. Providing safe and suitable access, parking, and servicing arrangements are key policy considerations at the local, regional, and national level. The draft proposals that we have seen do not provide safe and suitable access, parking, and servicing arrangements for Eel Pie Island in particular.
23. 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.



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<p style="text-align: center;"><b>ANALYSIS OF WSP TRANSPORT ASSESSMENT JULY 2021 – PLANNING REFERENCE 21/2758/FUL</b></p>
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Author:	Paul Mew Associates
Date:	12 <sup>th</sup> October 2021
Project:	P2172: Twickenham Riverside
Subject:	Analysis of WSP Transport Assessment July 2021 – Planning Ref: 21/2758/FUL

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, reprovion 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 85<sup>th</sup> 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-TRI0 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-TRI1 and TRI2 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 15<sup>th</sup> 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'.



19/02/2022

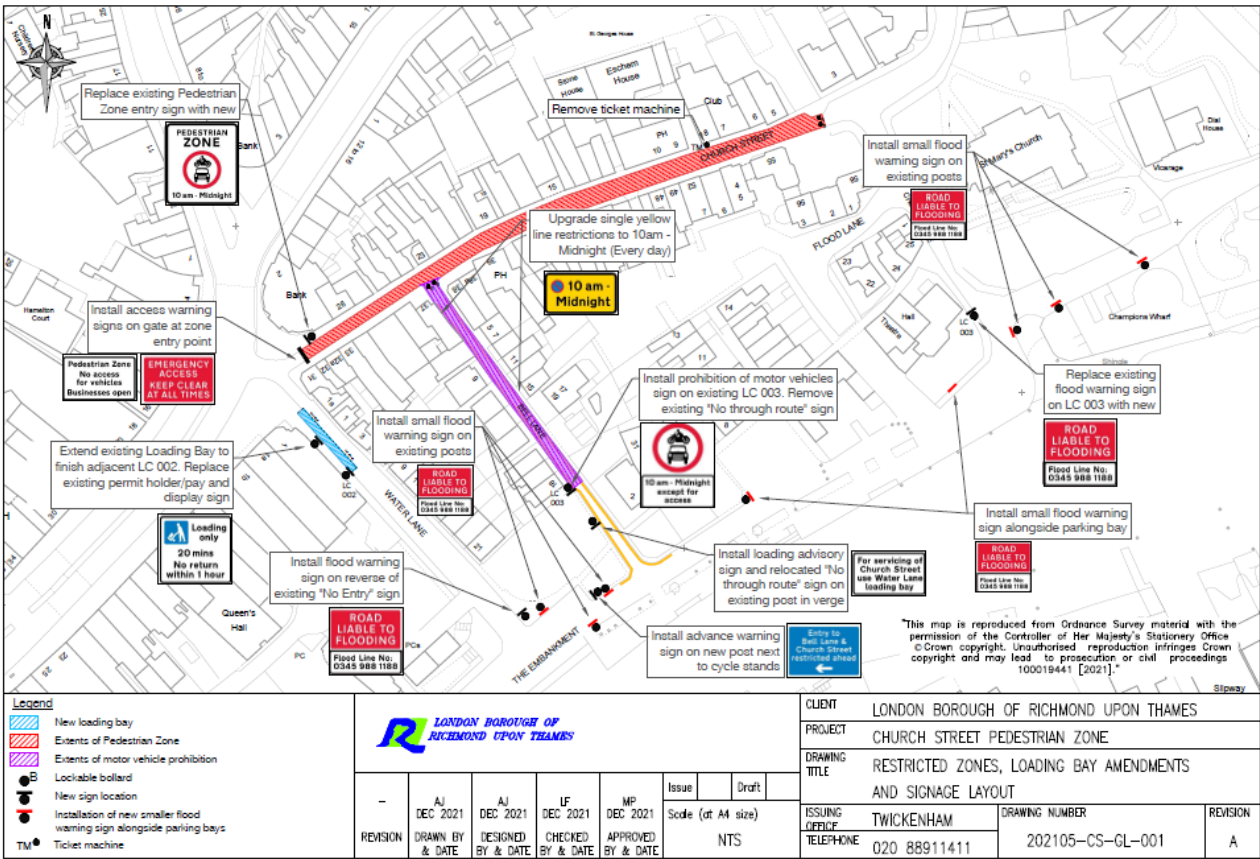
Planning Application: 21/2758/FUL Twickenham Riverside

Comment on Traffic Order : 22/020

This is particular important to Eel Pie Island Association as it impacts on the above planning application for Twickenham Riverside.

Changes to Parking Arrangements in Twickenham Riverside Development Area

Traffic Order 22/020 introduces loading bay at northern end of Water Lane to allow parking in Water Lane for servicing Church Street. Shown in the diagram below.



The Traffic Department of the council are “of the view that some provision for loading needs to be maintained at the northern end of Water Lane (irrespective of the outcome of the Riverside application)” (by e-mail) but acknowledge that it could be “relocated to the opposite side of the road should the Riverside project go ahead”. They have passed this opinion to the Riverside Project Team.

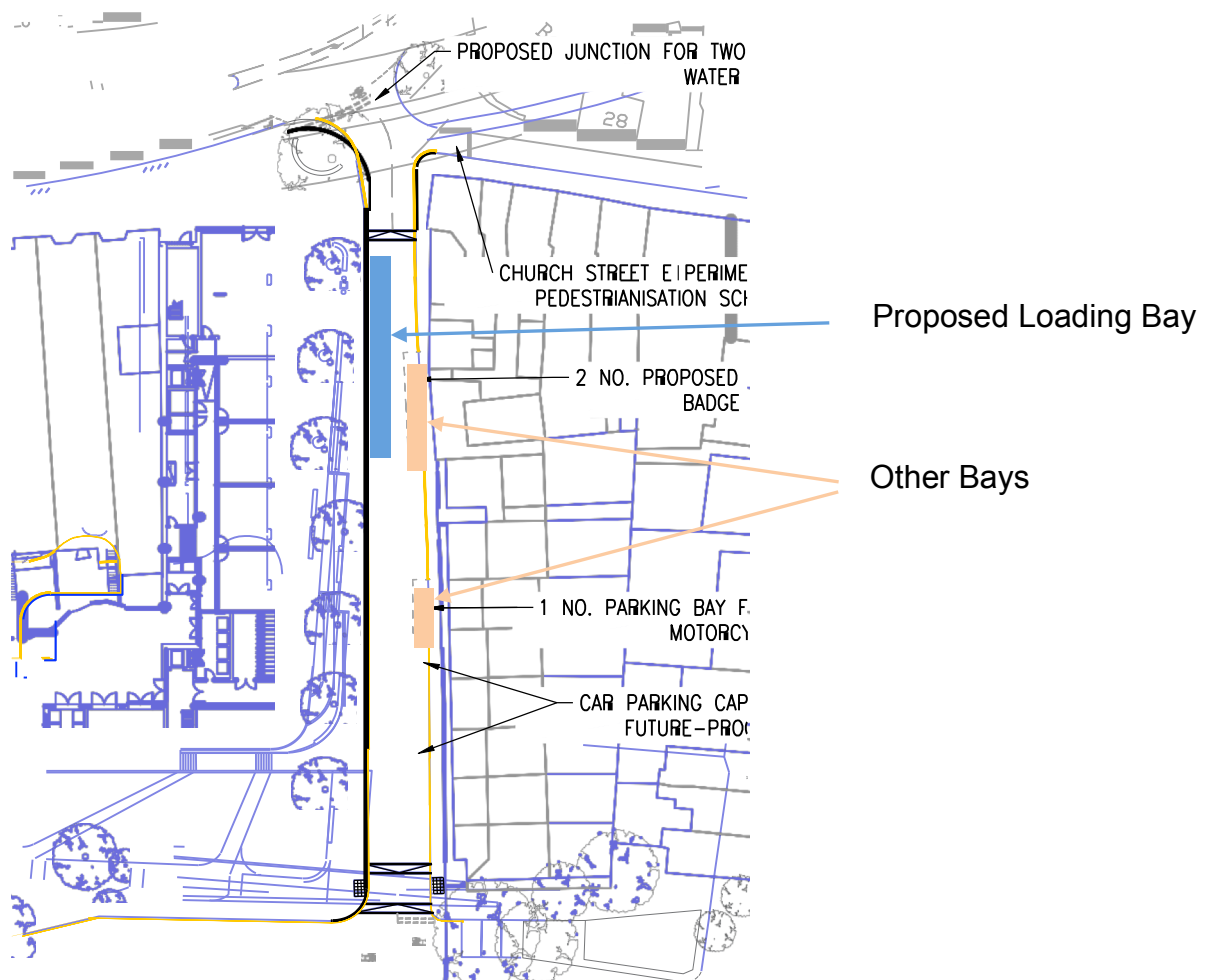
It is difficult to see how this loading area could be policed to ensure that it is only used for servicing Church Street. In reality vehicles will park in this loading bay for deliveries to Church Street, King Street and the proposed buildings in Water Lane. It is repeatedly observed that the existing loading bay in this area is already used by

non-commercial vehicles (people using cash points or popping quickly into local shops etc). Use of this loading bay will, therefore, send a not inconsiderable amount of vehicular movement down Water Lane.

The Riverside planning application envisages the Water Lane buildings being serviced from the service road off Wharf Lane and much was made in the discussions about the scheme of the reduction of traffic in Water Lane that this would bring about. The introduction of this loading bay undermines that assertion.

All the vehicles using this proposed bay will now need to continue down Water Lane to turn round in the servicing area by the Eel Pie Island bridge before proceeding north to return to King Street.

The diagram below shows the additional restriction to two-way working in Water Lane that this loading bay will cause.



The two-way working proposed will now be obstructed by three parking areas where the use of any of them requires vehicles to be on the wrong side of the road to get past and possibly requiring vehicles travelling in the opposite direction to wait to pass. Moving the loading bay to the other side of the road as suggested would displace the blue badge bays.

A submission to you, for the EPIA, by Paul Mew Associates on 22 Oct 2021 pointed out the lack of any meaningful safety audit of traffic movements in Water Lane and especially in the servicing area for Eel Pie Island. The imposition of this loading bay will increase traffic in these areas without its safety being assessed.

The Traffic Department of LBRuT have always maintained that any measures would be introduced by experimental traffic orders and could be changed if they were shown to be incorrect. However, as part of the CPO process the council is promoting a stopping-up order that will remove the existing use of the Embankment as a designated highway. This order will need to be in place before construction can begin. If at this point the measures are shown to be unsafe or unworkable it will be too late to change the arrangements as essential roads will have been closed.

It is essential, therefore, that a complete Stage 1 Safety Audit of the servicing area at the bottom of Water Lane which includes the servicing requirements of: Eel Pie Island, Church Street, the traffic generated by servicing King Street, the traffic generated by servicing the Water Lane building, and the implication of the stopping-up order is completed before any planning permission is given.

A handwritten signature in black ink, appearing to read 'Helen Montgomery-Smith', with a long horizontal flourish extending to the right.

Helen Montgomery-Smith

EPIA

Chair

**Objection to The Stopping Up of Highway Land at The Embankment, Water Lane, Wharf Lane and service road leading from Wharf Lane, Twickenham in the London Borough of Richmond upon Thames. Reference 21/2758/FUL.**

The proposed Stopping Up Order states that “all public highway rights over the Order Land shall be stopped up”. While it is self-evident that a stopping up order is required to facilitate the planned development its implementation is premature.

The proposed development of the Embankment, Diamond Jubilee Gardens and the land along Water Lane would impose a major change to the servicing arrangements for Eel Pie Island.

The proposed traffic arrangements are frail and untested.

The introduction of two-way working in Water Lane and Wharf Lane has not been subjected to meaningful safety assessment. While there has been an initial review of both roads' junctions with King Street, which elicited unfavourable comment from the Council's traffic planners, there has been no assessment of the areas at their southern ends. The viability of the two-way flow along the roads themselves has also been questioned with vehicles having to proceed on the wrong side of the road at several pinch points.

Removing through traffic along the Embankment by way of the stopping up order permanently, and at an early stage in construction, imposes two-way working in Water Lane and Wharf Lane and requires vehicles to execute three point turns at the southern ends of both streets. None of this has been subjected to safety audits.

At the southern end of Water Lane in the proposed servicing area for Eel Pie Island delivery vehicles, tradesmen's vehicles, and other loading activity supporting the Island will be forced to make three-point turns to exit the area northwards along Water Lane. The turning area conflicts with the natural pedestrian route along the Embankment and the main proposed cycle route. In addition, there is considerable leisure activity associated with the slipway in this area.

The planning application shows vehicle swept paths for these vehicles but there has been no safety audit of these proposals which would most probably highlight the dangers of large vehicles reversing in this busy area.

It would be unwise to impose any early closure of the Embankment until the proposed traffic flows have been shown to adequately support the area.

These comments apply equally to the southern end of Wharf Lane.

The only swept path in the planning application for articulated lorries shows a route along the Embankment. There has been no suggestion that these could execute the proposed three point turns of the other vehicles.

The planning application envisages restricted use of the Embankment by these vehicles servicing Eel Pie Island. However, there is no detail of how this will operate or if it will be sufficiently flexible to meet the needs of businesses and residents on the island. Additionally, due to the proposed 7.5t limit on vehicles turning into Wharf Lane from King Street, any larger vehicles servicing the development will also need to use the Embankment route.

Part of the order land overlays the HGV swept path along the Embankment. The order makes no mention of the requirement for vehicles to pass along the Embankment only that all public highway rights will be stopped up.

There has been no proper assessment of the impact of that this scheme, with its changed traffic pattern and parking loss, will have on the viability of town centre businesses and on the residents, businesses and leisure uses on Eel Pie Island.

Council Officers admit they do not know the impact removing parking from the Embankment. They state that measures will be implemented by experimental traffic orders. However, if it is found that scheme has a detrimental effect on the area there will be little scope for meaningful amendments to mitigate this after redevelopment has started.

Likewise, the effect of changed traffic patterns is unknown. There are real doubts about the viability and desirability of two way working in Water Lane and Wharf Lane. At present there is no suggestion that the order will be tested against reality. The only alternative to two-way working is traffic flow along the Embankment. Once construction has started there will be no opportunity to change the impact of the stopping up order.

The Embankment junctions at Water Lane and Wharf Lane are subject to regular flooding during Spring Tides which occur every 2 weeks. The flooding risk can extend for 2-4 days either side of the actual day of the Spring Tide. This is exacerbated when the river is in flood from heavy rainfall which increases river levels above the predicted tidal heights. As a result, the junctions can be flooded for extended periods in the winter months. At these times the turning areas, particularly the one at the bottom of Water Lane, are not viable. Water can come above the foot wells and flood into cars, the edge of the slipways cannot be seen as it is underwater increasing the risk of any attempted turning. A skip lorry tried just such a turn in March 22, and it fell into the river resulting in an incident with all the emergency services in attendance.

The viability of this very expensive proposed development rests on the successful reconfiguration of vehicle movements in the area. Surely it is prudent to see that the scheme really works before irreversible changes are made.

The stopping up order should not be made until its true impact is known.

The planning application 21/2758/FUL associated with the stopping up order above is currently in contravention to the following material policies.

- LBRUT Adopted Local Plan- Policies LP 18 River Corridors, LP 44 Sustainable travel choices, and LP45 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’.

Objection to application 21/2758/FUL Visuals accompanying Helen Montgomery-Smith presentation

Material Considerations : Access, Highway Safety, Adequacy of parking/loading and turning

**(Contrary to Eel Pie Island para 3.9 page 12 in report)**

- I am talking on behalf of Eel Pie Island, **which is part of Twickenham**, hosting historic boatyards, small businesses, creative workshops, active clubs used every day by workers, visitors, customers, members, students, and residents. All of which walk over the bridge mostly with trolleys and some without and some with rowing eight sculls on their heads.
- A large daily footfall goes on and off the Island.
- We are not against development of derelict site; we are for the local and wider community in Twickenham and all users of the Riverside
- We want the access, and servicing to be practical feasible and functional and safe for all the current users. This current proposal is not.
- Insufficient relevant traffic flow and real-life scenarios have not been used to inform the independent highway safety audit or included in swept path drawings P 24-29 TRT documents.
- As you can see from the photos (talk through...)
- Deliveries take place throughout the day and like buses they often come in threes.
- In the past few days' boatyard had 3 separate steel deliveries with prior notice of the days but just phone calls 20 mins before arriving this is industry standard.
- During high tides turning is just not possible
- The waiting of large vehicles both on Water Lane, The Embankment and Wharf Lane are daily common sights in the area.
- Pedestrianisation of Church Street has generated increase in servicing vehicles using the Embankment and therefore turning
- **Highways and transport mention in para 1.13 page 8 "short comings regarding the swept paths and manoeuvrability for certain vehicles around the site" we do too**
- **Similarly citing there will be "low traffic volume and speeds" does not mean that the area is safe or the turning feasible.**
- **Feasibility and traffic flow must be related to appropriate data information and represent realistic everyday scenarios for accurate analysis.**
- **The scheme needs a full safety audit taking account of the traffic, pedestrian and cycling movements.**
- **Proposed changes in traffic management is unknown and subject to an experimental traffic order.**
- **The current proposals are not ready for any decision that could lead toward road closure and stopping up orders.**

Helen Montgomery-Smith  
Chair

24/11/22



Objection to application 21/2758/FUL

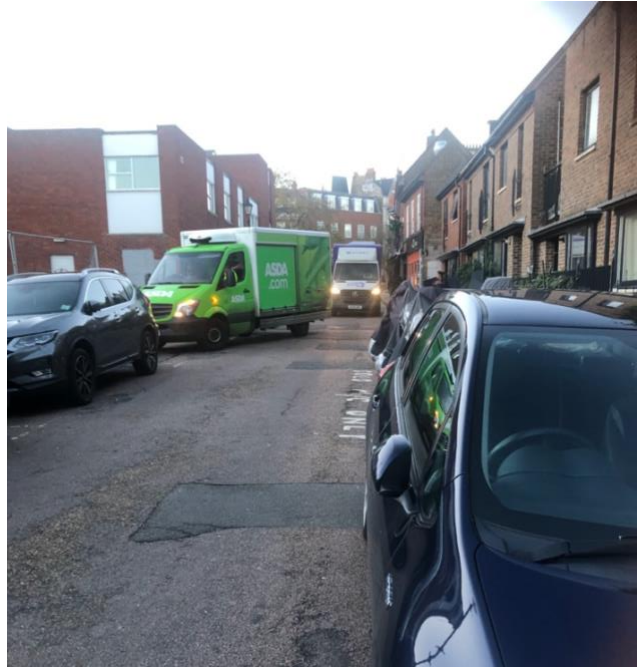
Visuals accompanying Helen Montgomery-Smith presentation 24/11/22

A few shots from yesterday

10 mins walk to post a letter



Delivery vehicles on Water Lane



Water Lane narrow passing and small delivery vehicles



Delivery on Water Lane now passing through the Embankment



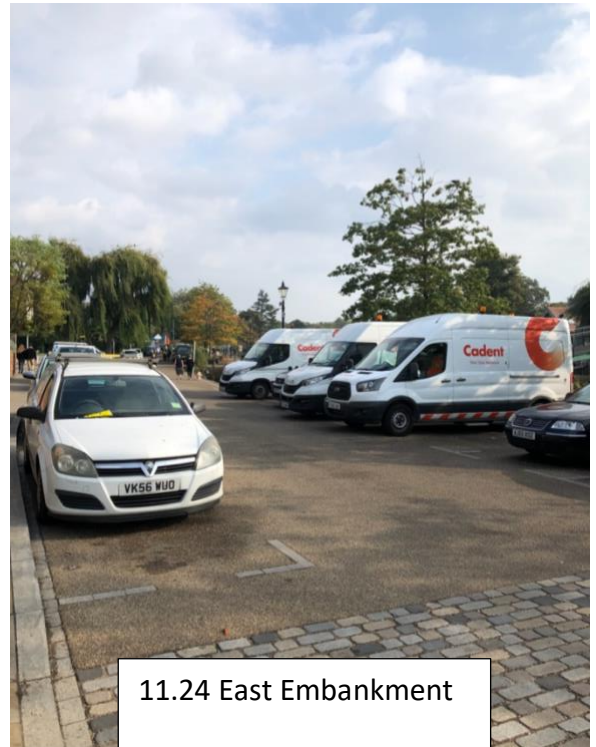
On going servicing in the proposed turning circle

Objection to application 21/2758/FUL

Visuals accompanying Helen Montgomery-Smith presentation 24/11/22



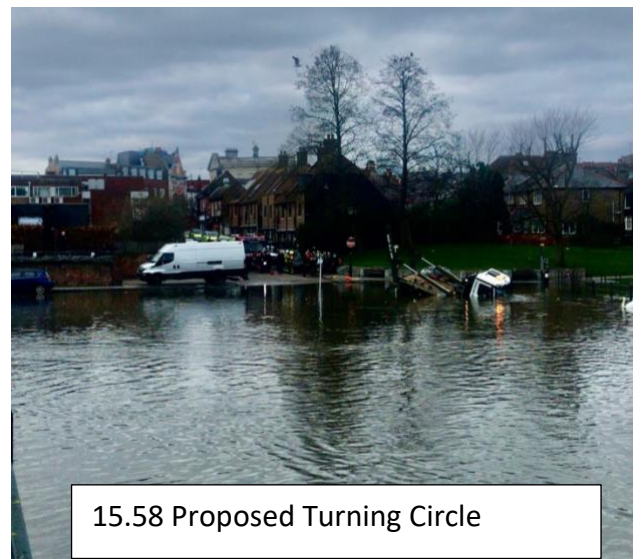
07.50 Wharf Lane



11.24 East Embankment



13.49 Bottom of Eel Pie Island Bridge



15.58 Proposed Turning Circle



**FAO**

Director of Environment and Community Services,  
London Borough of Richmond upon Thames  
Civic Centre  
44 York Street  
Twickenham  
TW1 3BZ

**Objection to The Stopping Up of Highway Land (02/02/23) at The Embankment, Water Lane, Wharf Lane and service road leading from Wharf Lane, Twickenham in the London Borough of Richmond upon Thames. Reference 21/2758/FUL.**

The Eel Pie Island Association reiterates that the implementation of a Stopping Up Order on land on the Embankment is premature. The proposed development of the Embankment, Diamond Jubilee Gardens and the land along Water Lane and Wharf Lane would impose a major change to the servicing arrangements for Eel Pie Island.

REASON: The proposed traffic arrangements are frail and untested and for this reason Planning Permission was given subject to the condition below to “*ensure the development does not cause severe highway impacts.*”

**a) “U0146064 NS23 Highway Matters**

*Prior to the commencement of the development a scheme detailing the following parking and highway matters shall be submitted to and approved in writing by the Local Planning Authority.*

*Stage 2 Safety Audit .....*”

We maintain that safety of the current users, pedestrians’ cyclists and vehicles regarding the proposed highway changes requires a Stage 2 Safety Audit ahead of the stopping order.

There are real doubts about the viability and desirability of two way working in Water Lane and Wharf Lane. At present there is no suggestion that the proposed traffic flows will be tested against reality and none of it has been subjected to a meaningful safety assessment.

While there has been an initial review of both roads’ junctions with King Street, which elicited unfavourable comment from the Council’s traffic planners, there has been no assessment of the areas at their southern ends. The viability of the two-way flow along the roads themselves has also been questioned with vehicles having to proceed on the wrong side of the road at several pinch points.

At the southern end of Water Lane in the proposed servicing area for Eel Pie Island delivery vehicles, tradesmen’s vehicles, and other loading activity supporting the Island will be forced to make three-point turns to exit the area northwards along Water Lane. The turning area conflicts with the natural pedestrian route along the Embankment and the main proposed cycle route. In addition, there is considerable leisure activity associated with the slipway in this area.

The planning application shows vehicle swept paths for these vehicles but there has been no safety audit of these proposals which would most probably highlight the dangers of large vehicles reversing in this busy area

Likewise, the effect of changed traffic patterns is unknown. The only alternative to two-way working is traffic flow along the Embankment.

The Embankment junctions at Water Lane and Wharf Lane are subject to regular flooding during Spring Tides which occur every 2 weeks. The flooding risk can extend for 2-4 days either side of the actual day of the Spring Tide. This is exacerbated when the river is in flood from heavy rainfall which increases river levels above the predicted tidal heights. As a result, the junctions can be flooded for extended periods in the winter months. At these times the turning areas, particularly the one at the bottom of Water Lane, are not viable. The edge of the slipways cannot be seen as it is underwater increasing the risk of any attempted turning. When vehicles cannot leave Water Lane by proceeding along the Embankment through the flooding and cannot turn to go back up Water Lane what happens to the traffic flow?

There should be no implementation of a stopping up order without a thorough audit of the proposals to determine whether the proposals are functional, safe and practical for access, parked up servicing and deliveries to take place for the Twickenham Riverside Area.

REASON: Planning permission was also given subject to the condition below to “*ensure the development is not prejudice to highway and pedestrian safety, to preserve residential amenity and to maximise the public realm value.*”

**b. “U0146065 NS25 Servicing and Delivery Plan**

*Prior to the first occupation of the development hereby approved, a servicing and delivery management plan shall be submitted to and approved in writing by the Local Planning Authority, both for the uses hereby approved, and also to ensure access for surrounding businesses and residents is maintained. This shall detail:*

- 1. Management arrangements*
- 2. Responsibilities and booking arrangements for access along the Embankment outside the hours of 7am-10am;*
- 3. Engagement programme with the community, including Eel Pie Island residents and businesses;*
- 4. Risk assessments;*
- 5. Use of traffic marshals and banksmen;*
- 6. access for emergency services,*
- 7. measures to encourage deliveries outside peak hours.*
- 8. Times and frequency of deliveries and collections*
- 9. Noise control measures to protect noise sensitive premises from delivery noise*
- 10. Control of vehicle movements including quiet reversing methods (preference will be given to broadband reversing alarms or alternative quiet safety methods for reversing)*
- 11. Good practice working methods to minimise impact noise for example associated with the delivery of 'beer barrels' .....*

The above points are essential to the management of the scheme there has been no discussion of these matters. (It is noticed that the Stopping Up Order now references 00.00 to 10.00).

If some of these requirements are deemed intrinsically unsafe or are not possible to implement further discussions will be needed.

An example of this is that current industry standards for delivery lorries servicing the island's businesses and residents are that they are driver operated and do not have a banksman.

The majority of deliveries are part of a fixed round with little warning of the times of delivery and if those are articulated lorries needing access to the Embankment what will be the arrangements to facilitate this and how responsive will they be?

How will vehicles greater than 7.5 tons service the proposed development. This does not seem to have been addressed.

We want to ensure when coming into an engagement programme the essential audits have taken place and meaningful practical and functional discussions can take place with the current users and the council.

To impose a stopping up order before the practicalities of the proposals have been rigorously assessed would be premature.

REASON: Planning permission was given subject to the condition below "*to ensure a satisfactory form of development that does not cause severe impacts on the highway network*"

**c) "U0146063 NS22 Highways and transport matters**

*a. Prior to the commencement of development, a scheme detailing the necessary Traffic Management Orders (under the Road Traffic Regulation Act 1984), Stopping Up Orders, Traffic Orders and other S38 and S278 or works of the Highways Act are in place to secure the following highway measures (including future management and maintenance where provision is on private land not forming public highway) shall be submitted to and approved in writing by the Local Planning Authority, in consultation with Transport for London.*

*i. Removal of the one-way system for vehicular traffic on Water and Wharf Lane and all signage*

*ii. removal of existing on street vehicular parking spaces and bays within the controlled parking*

*iii. new parking provision on the highway*

*iv. removal and relocation of loading ways,*

*v. insertion of double yellow lines and other parking and loading bay restrictions on the carriageway"*

*vi. Road layout, junctions, widening of carriageways, raised tables, ramped pedestrian crossings (with tactile paving)*

*vii. Parking controls*

*viii. Works on the adopted highway ....."*

Two-way working along Water Lane and Wharf Lane is untried and untested.

Drafting of an Experimental Traffic Order requires recording the traffic, cyclist and pedestrian movements accurately to reflect the situation at all times of the working day.

Practical environmental considerations require recognition e.g the Thames flooding the embankment highway. This takes place at high spring tides and times of heavy rainfall coming down River effecting the water levels. The proposed turning circle particularly at Water Lane is underwater.

Backing vehicles up Water Lane at high tide will impact on highway network.

The stopping up order should not be made until all the site-specific practical considerations have been thoroughly considered.

It is prudent to see that the proposed highway changes really work before irreversible changes are made.

The stopping up order should not be made until its true impact is known.

The planning application 21/2758/FUL associated with the stopping up order above is currently in contravention to the following material policies.

- LBRUT Adopted Local Plan- Policies LP 18 River Corridors, LP 44 Sustainable travel choices, and LP45 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’.

Helen Montgomery-Smith

For Eel Pie Island Association