

LBR33/INQ-25

THE LONDON BOROUGH OF RICHMOND UPON THAMES

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTIONS 226(1)(a) AND
226(3)(b)**

**LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1976
ACQUISITION OF LAND ACT 1981**

**THE LONDON BOROUGH OF RICHMOND UPON THAMES (TWICKENHAM
RIVERSIDE) COMPULSORY PURCHASE ORDER 2021**

AND

**APPLICATION FOR A CERTIFICATE PURSUANT TO SECTION 19 AND
SCHEDULE 3 OF THE ACQUISITION OF LAND ACT 1981**

**REBUTTAL PROOF OF EVIDENCE ON BEHALF OF THE
ACQUIRING AUTHORITY**

LBR33/INQ-

IN RESPONSE TO EVIDENCE SUBMITTED BY:

THE TWICKENHAM SOCIETY REF INQ-9

1. **INTRODUCTION**

- 1.1. This is further proof of evidence (“rebuttal”) by witnesses for the Acquiring Authority in response to the additional statement prepared by Sue Hamilton-Miller (Twickenham Society) regarding safety concerns (INQ09).
- 1.2. This rebuttal addresses additional points raised by Ms Hamilton-Miller., with witnesses addressing points relevant to their area of expertise. To the extent that points were raised that have already been responded to in LBR13, they are not repeated here.
- 1.3. The same references and abbreviations as used in the main Proofs of Evidence are used in this document.

2. **HIGHWAYS AND TRANSPORT (Nick O’Donnell)**

- 2.1. This section is being addressed by Nick O’Donnell. Details of Mr O’Donnell’s qualifications and experience are set out in his main Proof of Evidence (**LBR – 3A**).

Arragon Road Car Park

- 2.2. Two specific points raised by Ms Hamilton-Miller, which are as follows:
 - 2.2.1. The Council is relying on the Arragon Road car park to absorb the loss of parking on the Embankment.
 - 2.2.2. With regards to where people will park, Mrs Hamilton-Miller suggests that a further 437 vehicles may be seeking parking places in addition to the 82 being removed from Twickenham Embankment due to concerns over the ongoing viability of Arragon Road car park.
- 2.5 In response to the first point, this is not correct. The surveys attached as Appendix C in the first version of the Transport Assessment (CD 3.14, Part 6) show that there are other roads, streets, and other vehicular parking areas where Controlled Parking Zone (CPZ) Permits can be used within the central Twickenham CPZ which could accommodate motorists’ vehicles that are displaced as a result of The Scheme.

- 2.6 With regard to the second point, this is speculation over the future viability of Arragon Road car park. All Council-maintained car parks are inspected regularly as part of the Council's day-to-day operations and Arragon Road car park remains in use with no plans to change that or close it.

Construction Traffic

- 2.15 The Twickenham Society rebuttal has raised concerns over construction traffic on the site and the perceived problems that would bring.
- 2.16 In response to this and as set out in Nick O'Donnell's main proof of evidence (LBR 3A), paragraph 12 makes it clear that Planning Condition U0146 states that no development shall take place until a Construction Logistics Plan has been submitted to and approved in writing by the Local Planning Authority. This would address the concerns over construction traffic.

3. CONSERVATION AREA (Chris Bannister)

Mrs Hamilton-Miller stated in her evidence that Mr Bannister's proof of evidence did not mention the Conservation Area. As a matter of fact, in addition to Ms Johnson's reference to the impact on the Conservation Area at paras 6.46 to 6.53 of LBR4A, Mr Bannister discusses the Conservation Area at paragraph 8.8 of LBR2A. This was also addressed in the Committee Report (CD3.37) at 8.112 to 8.117.