

**LBR35/INQ-27**

**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**

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

**LBR35/INQ-**

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**IN RESPONSE TO EVIDENCE SUBMITTED BY:  
MRS HELEN MONTGOMERY-SMITH REF: INQ-11**

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 Mrs Helen Montgomery-Smith (Eel Pie Island Boatyard) regarding safety concerns (INQ-11.1).
- 1.2. This rebuttal addresses additional points raised by Mrs Montgomery-Smith, with witnesses addressing points relevant to their area of expertise. To the extent that points were raised that have already been responded to in LBR8, 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**).

**Mix of Road Users at the Southern end of Water Lane where it meets The Embankment**

- 2.2. Seventeen points were raised by Mrs Montgomery-Smith, which are as follows:
  - 2.2.1. The highway safety and access concerns raised by members of the Eel Pie Island Boat Yard and Association at meetings with the Twickenham Riverside team were not considered adequately.
  - 2.2.2. Servicing of Eel Pie Island and The Embankment takes place all day long.
  - 2.2.3. Access to The Embankment and to Eel Pie Island Bridge is shared by a lot of different user groups, and footfall coming on and off the island is considerable.
  - 2.2.4. COVID-19 changed how people and businesses shop and increased vehicular servicing trips to and from the island.
  - 2.2.5. Figures for traffic and service trip used by the Council to support The Scheme do not reflect what residents and businesses see and do not reflect current numbers.
  - 2.2.6. Statistical surveys used to estimate servicing trips are out of date.

- 2.2.7 Consultation on The Scheme took place during lockdown brought about by COVID-19 when businesses and clubs were themselves in lockdown.
  - 2.2.8 A full current transport assessment must be carried out with full, in-depth feasibility and safety studies at all junctions.
  - 2.2.9 The loading bays (north-west of the Eel Pie island Bridge on The Embankment) are full and it is commonplace to see two large trucks parked on the single yellow lines on both sides of The Embankment.
  - 2.2.10 The number of HGV servicing trips to and from The Embankment is incorrect. Eel Pie Island has accommodated 5 steel deliveries in the last month.
  - 2.2.11 Vessels are towed to and from the slipway for inspection.
  - 2.2.12 Delivery drivers to Eel Pie Island often only give 45 mins to an hour's notice of a delivery and the customer cannot dictate the time of deliveries.
  - 2.2.13 Drivers of large service vehicles do not have banksmen with them.
  - 2.2.14 The amount of disruption The Scheme will cause businesses and their suppliers is unknown.
  - 2.2.15 It is unclear how usable the proposed turning area at the southern end of Water Lane will be in instances of tidal flooding.
  - 2.2.16 Vehicular swept path analyses do not include everyday life scenarios, and the presence of the tide, cyclists, or pedestrians.
  - 2.2.17 The planning permission for The Scheme was given subject to planning conditions NS22, NS23, and NS25. These conditions show that the Council's Highways Department is aware that the proposals are untried, untested, and more work needs to be carried out.
- 2.3 In response to the first point, it is not clear over what timeframe and which meetings Mrs Montgomery-Smith refers to. However, two versions of the Stage 1 Road safety Audit were submitted by the applicant, the first in August 2021 (CD 3.14, Part 4) and the second in October 2022 (CD 4.08G) after detailed discussions of the issues raised in the first version

of the document between Council Officers and the applicant's Highway Engineering representative.

- 2.4 In response to the second point, the Council acknowledges that servicing trips to and from The Embankment take place all day. This is reflected in baseline parking stress and service vehicle trip surveys commissioned by the Council in 2019 and 2020 in order to help Officers assess the feasibility of changes to vehicular parking and traffic on The Embankment, Water Lane, and Wharf Lane which would occur as a result of The Scheme. These surveys were conducted over 24 hour periods.
- 2.5 Furthermore, the national development trip generation database ('TRICS'), which the applicant used to estimate the likely number of new servicing vehicular trips, used surveys that were carried out between 07.00 and 19.00.
- 2.6 In response to the third point, the Council acknowledges that The Embankment is shared by a lot of different road users at any one time and has designed the highway works proposed as part of The Scheme to reflect this, as set out in LBR 3B(01). The Stage 1 Road safety Audits (see CD 3.14, Part 4, and CD 4.08, Appendix G) submitted as part of the planning application have also considered the safety of the proposed highway works for pedestrians and cyclists.
- 2.7 In response to the fourth point, Mrs Montgomery-Smith has not provided any evidence to support this statement.
- 2.8 In response to the fifth and sixth points, the Council used a nationally recognised development trip generation database (see paragraph 2.5 above) which is updated on a quarterly basis, plus survey information it already held dated 2019 and 2020 to forecast the likely number of vehicular and servicing trips. Mrs Montgomery-Smith has not provided any evidence to support her statement that the information the Council collated and used does not reflect conditions accurately.
- 2.10 In response to the seventh point, it is not clear what consultation period Mrs Montgomery-Smith is referring to, however, the planning application documents were available on the Council's public website from August 2021. New documents were uploaded on to the website as they were submitted. The COVID-19 restrictions are not considered to have impacted the ability to make representations as part of that process.

- 2.11 In response to the eighth point, a full transport assessment of The Scheme was submitted with the planning application in August 2021 (CD 3.14). This was reviewed by Officers representing the Council as Local Highway and Local Planning Authorities as well as by consultants advising the Council as applicant between the autumn of 2021 and October 2022. In October 2022, an updated version of the transport assessment was submitted following Officer feedback (see CD 4.08). Stage 1 Road Safety Audits and Designer Responses, as well as baseline vehicular traffic counts at the King Street/Wharf Lane junction and the King Street/Water Lane junction, were appended to both versions of the transport assessment (CD 3.14, and CD 4.08F, CD 4.08G, and CD 4.08H).
- 2.12 In response to the ninth point, Mrs Montgomery-Smith does not say how often this scenario occurs and has not included any surveys to show this. The Council's Parking Policy team commissioned surveys of servicing vehicular trips on Water Lane, The Embankment, Wharf Lane, and the service road in March 2019 and in March 2020. In the surveys of Friday 6 March 2020, Monday 9 March 2020, Friday 13 March 2020, and Monday 16 March 2020, The Embankment accommodated an average of 42 service vehicles over four 24-hour weekdays. Of these trips, 25 were made by light goods vehicle (LGV), 14 by car, two by HGV, and one motorcycle. Water Lane accommodated an average of 66 servicing vehicle trips per 24-hour day over the same period. Of these trips, 36 were by motorcycle, 25 by light goods vehicle, three by car, and two by HGV. Based on this survey evidence, the Council is confident that all vehicles that are likely to need to service Eel Pie Island and The Scheme in the future will be able to do so safely.
- 2.13 In addition to the points raised in Paragraph 2.12, Page 19 of Appendix D of the revised transport assessment (CD 4.08D) shows that two large vehicles, one of which is an articulated HGV which is 12m long and 2.5m wide, and one of which is a refuse HGV which is 10.4m long and 2.5m wide, can use the area at the bottom of Water Lane at the same time. The Council will also use the Experimental Traffic Order to introduce lining and signage on the highway north of the proposed loading bays west of Eel Pie Island Bridge to prevent vehicles parking there for any longer than is strictly necessary. The Council will provide six dedicated loading bays west of the Eel Pie Island Bridge, three more than are currently there.
- 2.14 In response to the tenth point, in another statement, Mr Montgomery-Smith has said that steel structures are normally delivered to Eel Pie Island on 12m x 2.5m articulated HGVs. Page 19 of Appendix D of the updated version of the transport assessment (CD 4.08D)

shows that an articulated HGV which is 12m long and 2.5m wide can turn in the area at the southern end of Water Lane. Therefore, the Council is confident that this vehicle will still be able to service Eel Pie Island safely should The Scheme be built.

- 2.15 In response to the eleventh point, Appendix D of the updated transport assessment (CD 4.08D) shows that all vehicles that are likely to need to service The Embankment and Eel Pie Island will be able to do so safely.
- 2.16 In response to the twelfth point, see Paragraph 2.15 above. All vehicles that are likely to need to access The Embankment after 10.00 when the barriers will be closed will be able to turn around safely at the southern end of Water Lane. The Council is confident that, in all but exceptional circumstances, the barriers will not need to be opened after 10.00.
- 2.17 In response to the thirteenth point, the Council has not approved any planning conditions which state that drivers of HGVs must be accompanied by a Banksman because Council Officers do not think that Banksmen will be needed.
- 2.18 In response to the fourteenth point, see Paragraphs 2.12 and 2.15 above. The Scheme is not anticipated to cause disruption to businesses and their suppliers.
- 2.19 In response to the fifteenth point, the Council will be able to open the barriers on The Embankment after 10.00 in exceptional circumstances to ensure the highway is safe for road users. This matter is also referred to in paragraph 4.7 of the rebuttal to the statement of S4: Tower of Power (Eel Pie Island Bridge Company, (LBR-15).
- 2.20 In response to the sixteenth point, vehicular swept path drawings were sought by the Council to assess whether all vehicles that are likely to need to service The Scheme and other premises nearby, can do so safely. The Scheme proposes a footway on the northern side of The Embankment north-east of the turning area at the southern end of Water Lane where pedestrians will be able to wait while vehicles turn. Cyclists can also wait in the shared space area east of the turning area. As set out in paragraph 2.12 above, and in Table 6-16 of the transport assessment (CD 4.08) the recorded and forecast number of servicing trips is low so it is unlikely that this will occur regularly.
- 2.21 In response to the eighteenth point, the highway works, proposed changes to vehicular movement and parking, and servicing arrangements that are part of The Scheme have been approved in principle. Planning conditions NS22 and NS23 have been included to

secure the technical approval of the detailed design of the highway works, including lining and signage, by the Council as Local Highway Authority before development commences. Condition NS25 has been included to secure the approval of a detailed delivery and servicing management plan for The Scheme and the surrounding area, including Eel Pie Island, before The Scheme is first occupied.

**The exchange land contains The Embankment Road, which is our access and highway**

- 2.22 One point was raised by Mrs Montgomery-Smith, which was that the proposed shared surface area along The Embankment should not be part of the exchange land because there will always need to be access along The Embankment.
- 2.23 In response to this point, the only piece of highway on The Embankment that the Council needs to stop up is the 686 square metres shown on The Stopping Up Plan (CD 4.06). This is to enable the proposed boathouse and part of the podium for the Wharf Lane building to be built. Other than this, The Embankment will still be adopted highway although the land upon which it is built is part of the exchange land.

**Changes to Vehicular Parking on The Embankment and the need for a CPO to implement them**

- 2.24 Two points are raised by Mrs Montgomery-Smith, which are as follows:
- 2.24.1 That the report submitted by the Council's Parking Policy team to the Council's Transport and Air Quality Committee dated 15 June 2021 stated that the impact of removing vehicular parking spaces from The Embankment, Water Lane, and Wharf Lane is unknown.
- 2.24.2 Vehicular parking can be removed from the Riverside without any sort of Compulsory Purchase of the Trust's land.
- 2.25 In response to the first point, the Council commissioned a vehicular parking stress survey of the entire central Twickenham controlled parking zone (CPZ) in March 2019. This formed the basis for the report mentioned in paragraph 2.24.1 above. The survey showed that there was enough spare on-street parking capacity in the CPZ to enable residents who had their vehicles displaced from The Embankment, Water Lane, or Wharf Lane to park elsewhere within it.

- 2.26 In response to the second point, the removal of vehicular parking from The Embankment, Water Lane, and Wharf Lane is part of The Scheme, which cannot be built without the CPO.

### **The proposed Stopping Up Order**

- 2.27 Mrs Montgomery-Smith made a number of points regarding the proposed Stopping Up Order. In response to the points made we note that the draft Stopping Up Order has been publicised and the GLA has confirmed that no local inquiry is required, (INQ-05).

### **Safety of Access for vehicles on The Embankment**

- 2.33 Sixteen points are raised by Mrs Montgomery-Smith, which are as follows:
- 2.33.1 Safety concerns came up in every meeting with the Twickenham Riverside team.
  - 2.33.2 Assurances were given that full independent safety assessments would be carried out.
  - 2.33.3 Feasibility and traffic flow must be related to appropriate data information and represent realistic everyday scenarios for accurate analysis.
  - 2.33.4 The Scheme needs a full safety audit taking into account traffic, pedestrian, and cycle movements.
  - 2.33.5 Highways and transport in the Officer's report "shortcomings regarding the swept paths and manoeuvrability for certain vehicles around the site."
  - 2.33.6 The fact that there will be "low traffic volume and speeds" does not mean that the area is safe or the turning feasible.
  - 2.33.7 Stage 2 safety orders need to take place. Given that this has been a running theme through all meetings with EPIA and their objections, it is not clear why it still has not taken place.
  - 2.33.8 The council are not able to answer the valid concerns of local current and existing users of the Twickenham Riverside Area.
  - 2.33.9 There ought to have been an Experimental Traffic Order (ETO) to test the traffic and highway proposals prior to the CPO.



- 2.33.10 It is not clear how the employees from Systra who completed the vehicular parking and traffic surveys of March 2019 and March 2020 were briefed about spring and Neap tides and were they aware that The Embankment is vulnerable to flooding.
- 2.33.11 It is not clear what the impact for The Scheme is if the Stage 2 Road Safety Audit and the ETO come back as non-feasible regarding two-way vehicular traffic on Wharf Lane.
- 2.33.12 It is not clear how local users log difficulties during the ETO process.
- 2.33.13 It is not clear how Road Safety Auditors are briefed, or whether they are aware that vehicles service the Twickenham Riverside area. Similarly, It is not clear whether auditors are aware of the number of pedestrians using Eel Pie Island Bridge and the number of cyclists on the Scheme Land.
- 2.33.14 It is not clear what will happen if the Equality Impact Assessment means that the parking, servicing, and access proposals cannot be progressed to implementation.
- 2.34 In response to the first point, the highway safety concerns raised by all parties in response to the planning application were considered in detail by Planning and Transport Planning Officers at the Council between Autumn 2021 and October 2022 when an undated transport assessment and suite of appendices was submitted in response to concerns raised (CD 4.08, and CD 4.08A-H).
- 2.35 In response to the second point, a Stage 1 Road Safety Audit has been carried out and updated following concerns raised by Council Officers (see CD 3.14, Parts 4-5, and CD 4.08G).
- 2.36 In response to the third point, the traffic and parking surveys completed by Systra and referred to in CD 4.08C were carried out in accordance with current parking and traffic survey guidance. Regarding the number of trips The Scheme is forecast to create, the applicant used TRICS, a nationally-used development trip generation database, which is used as part of transport assessments submitted in support of planning applications throughout the United Kingdom. The objector has not submitted any surveys to support their case.
- 2.37 In response to the fourth point, see paragraph 2.34 above.

- 2.38 In response to the fifth point, paragraph 8.303 of the planning committee report (CD 3.37) refers to shortcomings regarding the swept paths and manoeuvrability of certain vehicles. However, Council Officers considered that the ETO can mitigate this through the removal of vehicular parking on The Scheme Land, except for service vehicles, disabled motorists, and motorcyclists, and by allowing the barriers to be opened between 07.00 and 10.00. The updated vehicle swept path analysis (CD 4.08D) also shows that all vehicles that are likely to need to service Eel Pie Island can turn safely at the southern end of Water Lane. Because of this, the impact of The Scheme on the safe operation of the highway within The Scheme Land was considered acceptable.
- 2.39 In response to the sixth point, see paragraph 2.37 above.
- 2.40 In response to the seventh point, Planning Condition NS23 of the planning permission (CD 3.40), states that a Stage 2 Road Safety Audit of the highway works that are part of The Scheme must be carried out prior to the commencement of development.
- 2.41 In response to the eighth point, the highway works that are part of The Scheme submitted as a planning application were considered in detail by Officers between Autumn 2021 when the application was validated and Officers consulted, and the Autumn of 2022 when the application was submitted to the Planning Committee. This is why an updated transport assessment and appendices was submitted (CD 4.08 and CD 4.08A-H). The ability of The Scheme to accommodate the servicing needs of Eel Pie Island was a key consideration and was why Council Officers commissioned two sets of parking and servicing survey data that were completed in March 2019 and March 2020.
- 2.42 In response to the ninth point, the plan to make the ETOs was approved with the intention to partly or fully mitigate the removal of the parking spaces on The Embankment as part of an approved scheme. Due to this and to allow the parking spaces to be used until removal at the required stage of the project construction, it was felt appropriate not to remove them at an earlier date. In addition, applying this approach will allow for the statutory Experimental Traffic Order process to be executed when the spaces are removed and the mitigating measures are in place. Representations invited as part of the process will be considered to see if further changes need to be considered. This point was also addressed in paragraph 3.6 of the rebuttal to statement TRT S2 (Ms Celia Holman), (LBR16-1).
- 2.43 In response to the tenth point, the employees from Systra that completed the survey of service vehicle activity on King Street, Wharf Lane, Water Lane, The Embankment, and the

service road were not briefed about flooding issues. The point of the surveys was to assess the type and number of vehicles that need to service area, when they do it, the vehicles used, and the manoeuvres they make. However, there are signs on The Embankment that say “Area liable to tidal flooding,” so they would have become aware of the issue during their site visits and through desktop analysis.

- 2.44 In response to the eleventh point, if a Stage 2 Road Safety Audit of the highway works proposed as part of The Scheme recommends that two-way vehicular traffic along Wharf Lane is not feasible, the Council will have to respond to the Auditor’s conclusions via a written Designer’s Response. However, in practice, the issue was considered resolved in the updated version of the Stage 1 Road Safety Audit of October 2022 (CD 4.08G). It is unusual for an Auditor to re-raise an issue that they considered resolved in a Stage 1 Audit. Therefore, the Council is confident that this will not happen.
- 2.45 In response to the twelfth point, any objectors to the ETO will be able to submit written objections and concerns to the Council as they would in response to any other proposed Traffic Management Order.
- 2.46 In response to the thirteenth point, a full list of documents that the Council submitted to the Road safety Auditor is listed in Appendix A of the Stage 1 Road Safety Audit submitted as CD 4.08G). As set out in the Audit, the Auditors completed their own site visits to record existing conditions and would have become aware that vehicles currently service The Embankment. They would have become aware that vehicles will need to service The Embankment if The Scheme is built though their examination of the drawings listed. Similarly, the Auditors would have observed pedestrian and cyclist behaviour during their site visits.
- 2.47 In response to the **sixteenth** point, the Council will have to consider and respond formally to the conclusions of the Equality Impact Assessment on the proposed vehicular parking, servicing, and access, as they will to the findings of a Stage 2 Road Safety Audit. However, as set out in paragraph 2.43 above, the proposed parking servicing, and access arrangements were not considered harmful to any particular group of road users in the Stage 1 Road Safety Audit, so the Council would not expect this issue to be raised in a Stage 2 Road Safety Audit or an Equalities Impact Assessment.

### **Stage 1 Road Safety Audit**

- 2.48 Mrs Montgomery-Smith raises a point about the Stage 1 Road Safety Audit, namely that the words “retain the existing one-way arrangement” which were included in Part 3.2.1 in the Stage 1 Road Safety Audit that was submitted as Appendix G of the transport assessment of August 2021 (CD 3.14, Part 4), were removed from the updated Stage 1 Road Safety Audit that was submitted with the updated transport assessment of October 2022 (CD 4.08G).
- 2.49 In response to this point, Mrs Montgomery-Smith has included the whole sentence that was written in Part 3.2.1 of the Stage 1 Road Safety Audit submitted as part of the transport assessment submitted in August 2021 (CD 3.14, Part 4), which said *“Summary: Insufficient width at junction mouths, resulting in collisions between vehicles travelling in opposite directions and collisions between vehicles and pedestrians. Detail: The swept path analysis drawings show significant overlap between vehicles entering and exiting the junctions. There are also instances of the swept paths crossing the kerb lines. The narrow junction mouths may lead to a risk of vehicles colliding with other vehicles at the junction; or over-running the footway and striking pedestrians. Recommendation: If possible, retain the one-way arrangement for Wharf Lane and Water Lane. As a minimum, provide bell-bollards or other physical features on the corners of the junctions to protect waiting pedestrians.”*
- 2.50 The ETO will introduce a restriction which restrict the weight of vehicles travelling between the King Street/Wharf Lane junction and the Wharf Lane/service road junction in a southerly direction to 7.5 tonnes or below. This will reduce the number and size of HGVs that turn into Wharf Lane from King Street and will reduce the risk of collisions. Page 3 of the Designer’s Response to the issues raised in a first version of the Stage 1 Road Safety Audit (CD 3.14, Part 5) also states that the Council will reduce the length of the proposed loading bay on the western side of Wharf Lane from 15m to 10m to take it 5m further south from the junction to increase the manoeuvring space for vehicles. The Council also agreed to provide an extended length of raised table along Wharf Lane to increase the total available width for pedestrians. Because of the Council agreeing to include those measures in the highway works that are part of The Scheme, the issue was considered resolved by the time the updated version of the Stage 1 Road Safety Audit was submitted in October 2022 (CD 4.08G).

**Increased use of the relocated loading bay on Water Lane and service vehicles turning**

- 2.51 Mrs Montgomery-Smith raises the point that the closure of Church Street to vehicular traffic between 10.00 and 00.00 has increased the number of vehicles using the existing loading bay at the northern end of Water Lane on its eastern side. Further, she states that these vehicles will also have to turn around at the southern end Water Lane, which will increase the number of motorists carrying out this manoeuvre, which will make the area less safe for other road users.
- 2.52 In response to this point, the existing loading bay, which will be relocated to the eastern side of Water Lane as part of the scheme, has a maximum length of stay of 20 minutes, which is part of the existing Traffic Management Order governing vehicular parking and movement on Water Lane. The surveys commissioned by the Council in March 2020 showed that, on average, over a 24-hour weekday, 52 vehicles serviced Church Street, so would need to use this loading bay if they arrived after 10.00, and 66 vehicles serviced Water Lane. This gives a total of 118 vehicles servicing Church Street and Water Lane over a 24-hour weekday. Sixty-eight of these vehicles stayed for under 10 minutes at a time.
- 2.53 Table 6-16 of the transport assessment (CD 4.08) shows that The Scheme will create 22 vehicular servicing trips. The café on the ground floor of the Water Lane building will be serviced from the service road. The only vehicles that will need to use the above loading bay to service the proposed development will be light goods vehicles making deliveries to individual flats and the retail units on the ground floor of the Water Lane building. The three retail units will replace retail units that already exist. The servicing trips for the retail units would have been included in the surveys of March 2020. Table 6-18 of the transport assessment (CD 4.08) shows that the 21 flats proposed in the Water Lane building will create a total of 8 two-way servicing trips between 07.00 and 19.00. In conclusion, the trip generation data and survey data of March 2020 demonstrate that the impact of vehicles turning at the southern end of Water Lane is acceptable.

**Impact of vehicles turning at the southern end of Water Lane on the safety of other road users**

- 2.54 Mrs Montgomery-Smith makes two points about the impact of vehicles turning at the southern end of Water Lane, which are as follows:
- 2.54.1 That pedestrians travelling down the ramp from the public open space towards the Water Lane/Embankment junction in an easterly direction will conflict with vehicles using the area at the southern end of Water Lane to turn, and

- 2.54.2 That the transport assessment and documents appended to it do not take account of number of different groups of road users that use The Embankment and who could conflict with vehicles using The Embankment to turn around because of The Scheme.
- 2.55 In response to the first point, the Council proposes (see LBR3(01) Appendix) a raised table at the southern end of Water Lane at its junction with The Embankment. This will reduce vehicle speeds and help give pedestrians priority over vehicles. Forward visibility of this raised table is good from the southbound carriageway on Water Lane.
- 2.56 In response to the second point, the surveys of service vehicle activity that the Council commissioned and which were carried out in March 2020 showed that, on average, a combined total of 160 service vehicles accessed Church Street, Water Lane, and The Embankment, per 24-hour weekday surveyed. Of these vehicles, 93 were light goods vehicles, 29 were motorcycles, and 17 were cars. Therefore, 149 out of 160 vehicles were vehicles that would not be likely to conflict with pedestrians or cyclists. In addition, as set out in paragraph 4.11 of the rebuttal of S-4: Tower and Power (Eel Pie Island Bridge Company), the Scheme will lead to a net decrease in vehicular trips at the Water Lane/King Street and Wharf Lane King Street junctions. This, combined with the physical measures proposed in LBR3(01) Appendix will reduce the risk of collisions between motor vehicles and pedestrians.

**Impact of two-way traffic on The Embankment on businesses, clubs, and tradesmen**

- 2.57 Mrs Montgomery-Smith raises three points in respect of the impact of two-way traffic on the Embankment, which are as follows:
- 2.57.1 That the proposed parking area for service vehicles on The Embankment does not equal the level of provision that is already there.
- 2.57.2 That the Scheme will result in tradespeople, sub-contractors that access Eel Pie Island being able to park their vehicles for long periods while they work, using their vehicle as a base.
- 2.57.3 That feasibility and safety audits have not been completed are not fit for purpose and the servicing needs of residents and businesses on Eel Pie Island have not been accommodated.

- 2.58 In response to the first point, page 34 of Appendix A of the Transport Assessment (CD 4.08A) shows that The Embankment has 40 vehicular parking spaces that are shared use for residential permit holders and pay and display users (maximum length of stay of 4 hours for pay and display users) between 08.30 and 18.30, Monday - Saturday, 10 spaces for use by residential permit holders only between these hours, five business permit holder only bays between these hours, three loading bays (08.30-18.30, Monday – Saturday, 1 hour maximum stay, not return within 1 hour), one street trader bay, and three pay and display only bays. The Scheme will result in the loss of all but the loading bays, which will increase from three to 6, the street-trader bay, and two bays that will be shared use between residential permit holders and pay and display users (see LBR3B(02) - Appendix).
- 2.59 The vehicular parking and servicing activity surveys that the Council commissioned, and that were completed in March 2020, showed that, on average, 42 vehicles serviced The Embankment per 24-hour weekday surveyed. Of these trips, 25 were made by light goods vehicle, 13 by car, 2 by HGV, one by bicycle, and one by motorcycle. Of these vehicles, 7 had a dwell time of 0-5 minutes, 8 had a dwell time of 5-10 minutes, 11 had a dwell time of 10-20 minutes, and 14 had a dwell time of over 20 minutes. Given the type of vehicle that typically needs to access and park on The Embankment to service this area and Eel Pie Island, the recorded frequency at which they do this, and the recorded dwell times, it appears that 6 loading bays (maximum stay 1 hour between 08.30 and 18.30, Monday - Saturday, No Return within 1 Hour) is sufficient to meet the needs of existing users of The Embankment.
- 2.60 In response to the second point, The Scheme might have a negative impact on pay and display users who use the shared use bays for periods of up to four hours at a time. However, they will be able to park in one of the 6 loading bays west of the Eel Pie Island Bridge for up to one hour at a time, unload equipment, park elsewhere in the Central Twickenham CPZ, and return to their workplace on Eel Pie Island. However, given that only one third of the servicing trips surveyed on The Embankment had a dwell time of more than 20 minutes, it is unlikely that this scenario will occur often.
- 2.61 In response to the third point, please see paragraphs 4.9 – 4.11 of the Council’s rebuttal of S-4: Tower and Power ((Eel Pie Island Bridge Company).

