

**LBR40 / INQ34**

**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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**FURTHER RESPONSE TO MR HEATH**

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1. **INTRODUCTION**

- 1.1. This is a response to evidence submitted during the Inquiry by Mr Colin Heath and raised when presenting to the Inquiry.
- 1.2. The same references and abbreviations as used in the main Proofs of Evidence are used in this document.
- 1.3. The response concerns highway safety and transport matters, namely the validity of traffic surveys the Council commissioned to help them make recommendations to the Council's Transport and Air Quality Committee regarding the changes to the regulation of vehicular traffic and parking on Water Lane and The Embankment. These issues were addressed by Mr Nick O'Donnell, Assistant Director for Traffic and Engineering at Richmond and Wandsworth Councils, in his Statement of Evidence (**LBR – 3A**).

2. **RESPONSE**

- 2.1. Mr Heath has submitted two Microsoft Excel files which contain the results of vehicular traffic surveys on The Embankment and Water Lane, which specifically concern vehicles servicing premises on The Embankment and Water Lane. These surveys were commissioned by the Council and were carried out on 8 July 2019 and 12 July 2019. The results of these surveys helped Council Officers write the report that was submitted to the Council's Transport and Air Quality Committee. The paper is dated 15 June 2021 and was submitted as Appendix C of both the first and updated transport assessments (CD3.14, Part 3, and CD 4.08C). Mr Heath has also included a copy of the Stage 1 Road Safety Audit that was submitted as Appendix G of the updated transport assessment (CD 4.08G).
- 2.2. In an email containing the attached documents set out above, Mr Heath says: *"The two Sysstra study spreadsheets are essentially the same document with the same details in the first four sheets of the workbook with the fifth sheet of each detailing a single day. In both the Camera Views sheet shows the area covered and this is further reinforced on the Plan of Zones sheet. This was a survey solely of servicing traffic on the Embankment. The figures do not include servicing activity on King Street."*

- 2.3. In response to this point, the Council has commissioned a number of surveys over multiple years that have been used to help inform the Scheme. One of these surveys was of vehicular traffic relating to service vehicles on The Embankment, Water Lane, and on the southern side of King Street between Wharf Lane and Water Lane, on Monday 18th, Friday 22nd, Monday 25th and Friday 29th March 2019. This was in addition to the surveys of vehicular traffic relating to service vehicles that the Council commissioned and were carried out in March 2020. These clearly show servicing on King Street was included in both the surveys of 2019 and 2022.