

RICHMOND BOROUGH COUNCIL

**Town and Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004
The Town and Country Planning (Determination by Inspectors)
(Inquiries Procedure) (England) Rules 2000 (as amended)**

PROOF OF EVIDENCE

**Will Marshall MSc
Principal Transport Planner, Richmond and Wandsworth Councils**

**On behalf of the London Borough of Richmond Local Planning and Highway
Authority**

Site Address:

**Arlington Works
23-27Arlington Road
Twickenham
London
TW1 2BB**

Planning Application Reference:

18/2714/FUL

Planning Appeal Reference:

APP/L5810/W/20/3249153

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1. Introduction

1.1 My name is Will Marshall. I am a Principal Transport Planner for the London Boroughs of Richmond and Wandsworth and have held the post for two years and two months. I have four and a half years of experience in the transport development management sector within local government. I hold a National Certificate in Transport Development Management from the Institute for Highway Engineers and an MSc in Transport Planning and Management.

1.2 I am familiar with the site and its surroundings and have visited the site on three occasions.

1.3 The evidence that I have prepared and provided in this proof is true and the opinions I express are my true professional opinions.

2. Summary

2.1 The appellant has proposed 21 vehicular parking spaces for 24 dwellings (5 x 1-bed, 12 x 2-bed, 7 x 3-bed). The proposed number of spaces does not meet the maximum off-street vehicular parking standards for residential developments that is set out in Local Plan Policy LP45 and Appendix 3 of the London Borough of Richmond's adopted Local Plan (2018). The London Borough of Richmond (LBRuT) has requested that the appellant enter into a legal agreement under S106 of the Town and Country Planning Act 1990 which would preclude any occupant of the proposed development from obtaining a vehicular parking permit within any controlled parking zone (CPZ) within the London Borough of Richmond, as set out in Para. 11.2.2 of the Local Plan (2018). This would mitigate the effect of overspill parking which would arise from the residential land use on streets within CPZs East Twickenham and St. Margaret's South in accordance with Para.108c of the National Planning Policy Framework (NPPF). The appellant has not submitted a draft legal agreement to the Local Planning Authority. The proposal is therefore contrary to Local Plan Policy LP45, Para. 1 and Para. 108c of the NPPF. My objection on these grounds would be lifted if a suitable legal agreement was put in place.

2.2 The appellant has allocated five parallel vehicular parking bays for use by Twickenham Film Studios on the southern side of the access road south of their red line boundary, a net loss of two vehicular parking spaces for the Film Studios and a gross loss of 11 vehicular parking bays that appear to be privately rented to individuals, in comparison to the current parking provision. The appellant has not provided a suitable on-street vehicular parking stress survey which shows that there is sufficient on-street vehicular parking capacity on streets within 500m walking distance of the site to enable the individuals that would lose their parking spaces to park their vehicles to park on the street during the hours of operation of their place of work. The proposed development is therefore contrary to Local Plan Policy LP45, Para. 1 and to standards set out in the *Lambeth Parking Survey Methodology* (London Borough of Lambeth, 2012) because I am unable to say whether the number of motorists that would lose their parking spaces because of the proposed development could park their cars in streets within 500m of the site without pushing the level of on-street parking stress above the level of 85% of total on-street vehicular parking capacity.

2.3 As a separate objection, the appellant proposes to make use of the existing private access road between the site and its junction with Arlington Road. It proposes that the road will continue to be a shared space area and will have allocated parallel parking bays on both sides. Pedestrians and cyclists will share a central running lane with motorists which will have a width of 4.44m between the parallel parking spaces. The proposed design of the shared space area has not given due consideration to national design guidance on shared space areas and the appellant has not proposed any road safety features which would help reduce the risk of conflict between pedestrians, cyclists, and vulnerable road users with cars and service vehicles, some of which will be heavy goods vehicles (HGVs), accessing and egressing the site. The proposed development is therefore contrary to Para. 108b of the National Planning Policy Framework (NPPF).

2.4 If the appellant does not demonstrate that it has the appropriate legal means to enforce adherence to the proposed vehicular parking layout on the access road and within the site itself, motorists would have to reverse vehicles for large distances, which is likely to lead to conflict with pedestrians who would share the

road-space. Also, the appellant has not set out how it will force motorists to park parallel to the office building south of the access road on land it does not control. This is likely to result in motorists continuing to park perpendicular to the building which would not allow a safe minimum running lane width for vehicles. The development is therefore contrary to Para. 108b of the NPPF.

3. Transport/Highways Reasons for Refusal

3.1 This appeal relates to planning application 18/2714/FUL, which was refused by the London Borough of Richmond on 19 September 2019. There are two reasons for refusal of relevance to my evidence:

5. The proposed development, by reason of its lack of segregated pedestrian/cycle access into/throughout the site and unsatisfactory siting and layout, would result in an unacceptable co-location of uses which gives rise to inappropriate conflict between users, to the detriment of the proposed commercial use operation and the safety/amenity of proposed residential occupants. The proposed development is therefore contrary to policy the NPPF, policies 4.3 of the London Plan (2016), LP1 (A.6) and LP35(A) of the Local Plan (2018).

6. The proposed development, by reason of its lack of sufficient off-street parking provision, the loss of existing parking spaces on the access road and in the absence of a satisfactory parking survey to demonstrate there is capacity in the surrounding roads to accommodate the likely parking shortfall, would adversely impact on existing on-street parking conditions, the free flow of traffic and pedestrian and vehicular safety on the surrounding highway network. Furthermore, in the absence of a binding agreement to secure the removal of rights to parking permits and provision of car club memberships for prospective occupants, the application would fail to adequately promote sustainable modes of transport. The scheme is therefore contrary to the aims and objectives of policies policy LP45 of the Local Plan (2018) and the adopted Front Garden and Other Off-Street Parking, and Planning Obligations Supplementary Planning Documents.

4. Vehicular Parking

4.1 The site has a public transport accessibility (PTAL) score of 3 and is in CPZ Zone F East Twickenham which operates from 10.00-16.00, Monday – Friday. The PTAL report for this site has been included as Appendix A, by way of a Microsoft Excel spreadsheet, and a map of CPZ Zone F is included as Appendix B. Plan No. 4786-3-10-B shows that the appellant proposes 21 off-street vehicular parking spaces for the dwellings and two off-street vehicular parking spaces for the offices. A copy of Plan No. 4786-3-10-B have been provided as Appendix C.

4.2 The appellant applied for permission to change the use of the site from B2 industrial land use to 24 x flatted dwellings (5 x 1-bed, 12 x 2-bed, 7 x 3-bed) and 610m² of B1 office land use. Appendix 3 of LBRuT's adopted Local Plan sets out the maximum number of off-street vehicular parking spaces that the appellant would need to provide in accordance with Local Plan Policy LP45, Para. 1. The appellant must provide up to 31 spaces to meet the maximum standards for the proposed dwellings and up to two off-street vehicular parking spaces for the proposed offices, a total of 33 spaces. This is based on a calculation of 1 space per 1 and 2-bed dwellings, 2 spaces each for dwellings with more than two bedrooms, and 1 space per 300m² of office space. Therefore, the proposed development is likely to create an overspill of up to 10 vehicles that would need to park on-street overnight when measured against the maximum standards. A copy of Local Plan Policy LP45 has been provided as Appendix D and a copy of the maximum off-street vehicular parking standards set out in Appendix 3 of the Local Plan has been provided as Appendix E.

4.3 Para.11.2.3 of the LBRuT's adopted Local Plan states that:

Developers may only provide fewer parking spaces, including car free schemes, if they can demonstrate as part of a Transport Statement or Transport Assessment with supporting survey information and technical assessment that there would be no unacceptable adverse impact on on-street parking availability, amenity, street scene, road safety or emergency access in the surrounding area, as a result of the generation of unacceptable overspill of on-street parking in the

vicinity. In general, it is expected that in PTAL areas of 0-3 the standards should be met.

4.4 Regarding on-street vehicular parking stress caused by parking overspill from the proposed dwellings, the appellant has provided an on-street parking stress survey which, for the most part, has been carried out in accordance with the London Borough of Richmond's current draft Supplementary Planning Guidance (SPG) *Richmond Parking Survey Methodology* (2006). They have counted one parallel parking space as being 5m in length and have carried out the survey on all streets within 200m walking distance of the site.

4.5 The SPG states that:

In order to assess the parking stress the tabulation must calculate the number of parked cars shown on the results map of each survey, against total available space calculated from the inventory survey and add the shortfall anticipated from the development using the Council's parking standard maximums.

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.*

4.6 Were these standards to be strictly adhered to, the vehicular parking overspill (maximum standards – the number of spaces the applicant proposes), could push stress levels within the surveyed area up to 84% on an early Wednesday morning, to 91% on an early Friday morning, and to 83% at weekends, and to 87% on average.

4.7 Occupants of the current site, operating under its current land use, are eligible to apply for on-street vehicular parking permits within the East Twickenham CPZ. If residents decided to apply for CPZ vehicular parking permits, this is likely to lead to motorists parking unsafely on parts of the highway such as those with single

yellow line restrictions, thereby disrupting the flow of vehicular traffic, on footways, which will reduce the quality of the street-scene by restricting use of parts of the footway for pedestrians, and in front of vehicular accesses to residential properties, which would impede access and egress for residents and emergency service vehicles. As can be seen in the photograph marked Figure 1 below, on-street vehicular parking space within the East Twickenham CPZ is heavily used, to the extent that LBRuT has to utilise parts of the footway to provide enough CPZ bay space to meet demand and has to rely on a high number of single yellow line restrictions to enable vehicular traffic to move safely on two-way roads. The proposed development would therefore be contrary to Para. 108b of the NPPF.

Figure 1: On-street vehicular parking on Arlington Road, North-East of the Site Access (taken by the Author, December 2020)



4.8 To mitigate the impact of overspill parking on streets within this CPZ overnight arising from the proposed dwellings the appellant must enter into an agreement under S106 of the Town and Country Planning Act 1990 to ensure that occupants of the proposed dwellings are excluded from the CPZ as specified in Para. 11.2.2 of the Local Plan which I have attached as Appendix F. This is in accordance with Local Plan Policy LP45 and Para. 108c of the NPPF which I have attached as Appendix G. In my view, residential and commercial travel plan statements should also be secured in accordance with Para. 11.1.11 of the Local Plan (2018) and Para. 108a of the NPPF. Both proposed measures would help mitigate the risk of overspill parking on streets within 200m walking distance of the site overnight and

would settle the area of disagreement between the appellant and the Local Planning Authority listed in the first bullet point of Para. 2.4 of the Statement of Disagreement.

4.9 The appellant intends to provide 7 parallel vehicular parking spaces on the northern side of the access road for residents and five parallel vehicular parking spaces on the southern side of the access road for employees of the Twickenham Film Studios. There are currently 18 perpendicular under-croft vehicular parking spaces on the southern side of the access road. Seven of these spaces appear to be allocated to employees of Twickenham Film Studios. The remaining 11 are reserved for individual motorists. I have attached two photographs that show this arrangement as Figure 2 and Figure 3.

Figure 2: Photograph of Perpendicular Parking Spaces used by Twickenham Film Studios on the Southern Side of the Access Road (taken by the Author, 10 December 2020)



Perpendicular parking spaces used by Twickenham Film Studios on the southern side of the access road.

Figure 3: Perpendicular parking spaces on the southern side of the access road used by private individuals



Perpendicular parking spaces south of the access road used by private individuals.

4.10 Therefore, the proposed vehicular parking arrangement is likely to create overspill parking of up to 13 vehicles on nearby streets or within the development during the daytime if the users of the spaces on the southern side of the road are forced to park elsewhere. The appellant should have completed a vehicular parking stress survey to show that this level of overspill parking could be accommodated on streets within 500m walking distance of the site during the hours of operation of the businesses the users of the spaces work at in accordance with the *Lambeth Parking Survey Methodology* (2012) but has not submitted this. I have attached the relevant extract of the *Lambeth Parking Survey Methodology* as Appendix H. Therefore, I cannot say whether the likely overspill can be accommodated on local streets without pushing on-street parking stress beyond what LBRuT regards as the maximum safe level as set out in Para. 4.5 of this proof. I have confirmed with LBRuT's Parking Operations team that Twickenham Film Studios is eligible to apply for on-street vehicular parking permits within CPZ Zone F and currently hold three permits which are due to expire in August 2021. The two employees of Twickenham Film Studios would be able to apply for commercial vehicular parking permits within the CPZ. The remaining 11 motorists would also be able to apply for

commercial vehicular parking permits within the CPZ Zone F if their place of work is eligible or if they are a resident within the CPZ.

4.11 The five parallel parking bays on the southern side of the access road are not within the red line of the appellant's site and the appellant has not set out how they will reserve those spaces for employees of Twickenham Film Studios. The resulting overspill of up to 13 parked vehicles on nearby streets is likely to cause the motorists who have lost their current spaces to park unsafely, such as in areas with single yellow line restrictions, which is likely to disrupt the safe and flow of vehicular traffic, on footways maintained by the Local Highway Authority, and in the shared space area within the proposed development, which makes them less safe to use for pedestrians and wheelchair users and could also prevent safe and suitable access to parts of the road network for large vehicles and emergency service vehicles.

4.12 The appellant has not included any active or passive electric vehicle charging points within parking spaces in the proposed development. This is contrary to the maximum off-street vehicular parking standards set out in Chapter 6.2 of the adopted London Plan, Which I have included as Appendix I of this proof, and Local Plan Policy LP45, Para. 1, and Para. 11.2.5 of LBRuT's Local Plan, which I attach as Appendix J of this proof. However, my objection on these grounds could be lifted if a suitably worded planning condition were included, were the Inspector to allow the appeal, which stated a revised layout plan showing the provision of 20% of the proposed off-street vehicular parking spaces as being provided with active means of electric vehicle charging and 20% of the proposed off-street vehicular parking spaces being provided with passive means of electric vehicle charging must be submitted to and approved in writing by the Local Planning Authority prior to the commencement of development.

4.13 The appellant has not agreed to enter into a legal agreement fund membership of a local car club for residents of the proposed development. This formed part of LBRuT's reason for refusal No. 6 issued on 19 September 2019. Para. 11.2.5 of the Local Plan states that "car share facilities and car clubs will be encouraged, but these may not obviate the need for adequate off-street parking provision." Although

the proposed development does not contain enough dwellings or commercial floorspace to warrant a car-club space within the proposed development site, there are two car club bays on the highway within 650m walking distance of the site, one on Arlington Road administered by Zip Car and one on St. Margaret's Road administered by Enterprise. If the appellant did not agree to enter into a legally binding agreement then the risk of overspill vehicular parking on streets in the locality of the proposed development, which already operates close to what LBRuT considers to be the maximum tolerable level of on-street vehicular parking stress (see Para. 4.6), would increase further because more people would live and work in the area as a result of the development and would feel that they had no choice but to own a car. This is contrary to Local Plan Policy LP45 Paras. 1 and 4.

5. Vehicular and Pedestrian Access Issues

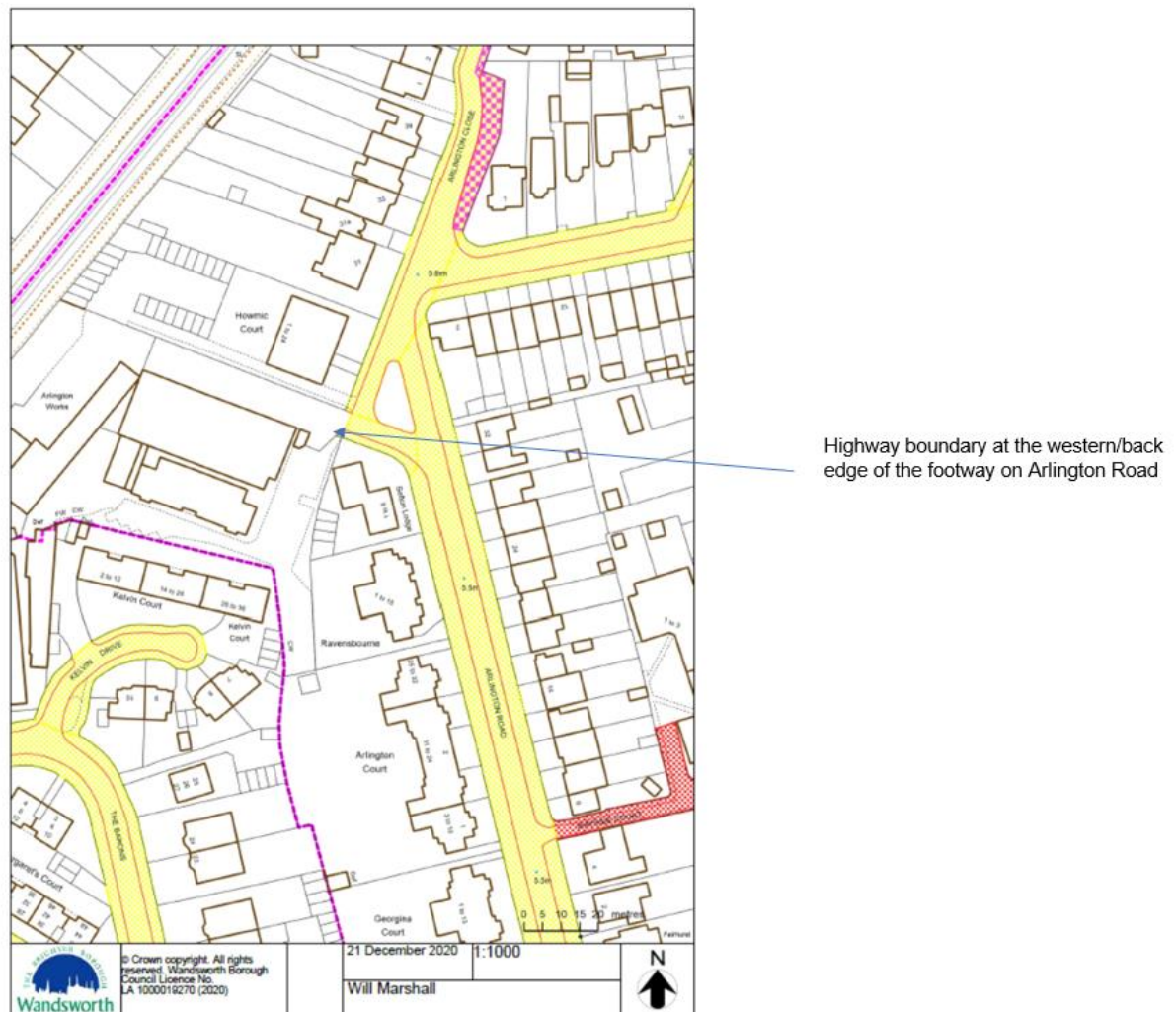
5.1 To access the development, occupants will have to use an existing shared space private access road which is itself accessed from the western side of Arlington Road via a bell-mouth access that is 4m wide. The photograph provided as Figure 4 overleaf shows the access looking westwards from Arlington Road. I have attached a plan showing the highway boundary on Arlington Road in relation to the site access as Figure 5. The highway boundary would appear to be that the back edge of the footway on the northern and southern side of the site access.

Figure 4: Photograph of Access to the Site from Arlington Road (Taken by the Author, 10 December 2020)



Private access
to the
development
west of
Arlington
Road.
Carriageway
width of 4m.

Figure 5: Highway Boundary East of the Access to the Proposed Development (London Borough of Wandsworth, 2020)



5.2 West of the highway boundary mentioned above, the private access road is a shared space road. There is approximately 53m between the back edge of the footway on Arlington Road and the eastern edge of the forecourt upon which the appellant intends to build. There is a wall which serves as the southern boundary wall to Howmic Court immediately to the north of the access road. South of the wall there is a verge/area with no hard surfacing of 0.9m in width. South of this point there is a running lane width of 3.74m for all road users. Immediately south of this there is a perpendicular parking area of 18 parking spaces which each measure 4.8m in length and 2.4m in width. The southern-most 2.4m length of these parking

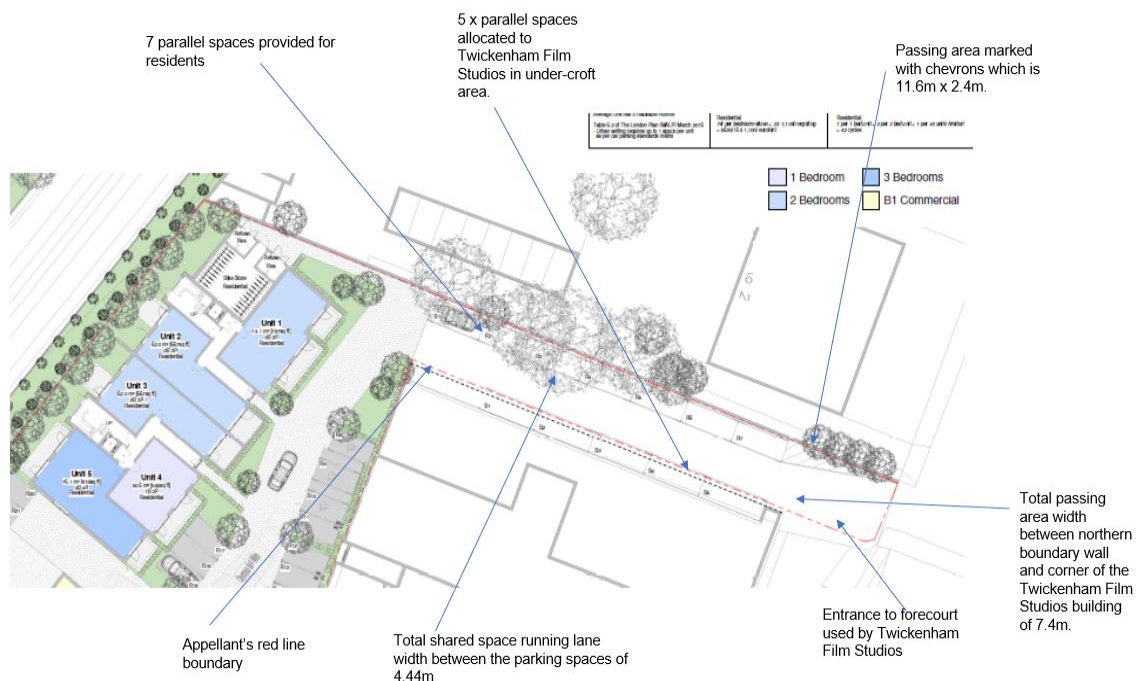
bays is an under-croft parking area of a building used by Twickenham Film Studios. The access road is surfaced with concrete south of the above-mentioned verge and is in poor condition. The appellant has not provided any details of whether or how the access road will be resurfaced. There is no external lighting along the access road and the appellant has not indicated that they will provide any. The photograph in Figure 6 below shows the current layout of the road in relation to the current parking area.

Figure 6: Photograph of Current Layout of the Access Road (taken by the Author, December 2020)



5.3 There is a total width of 9.44m between the northern boundary wall and the back wall of the under-croft parking area to the south. The appellant proposes to utilise all of this to provide 7 parallel parking bays on the northern side of the access road, which would be allocated to residents, 5 parallel parking bays on the southern side of the access road which would be allocated to the Twickenham Film Studios, and a shared space running lane width between the two rows of parked cars for all road users which will be 4.44m in width. I attach a copy of the proposed ground floor site plan which the appellant submitted with their planning application, but with my annotations added, as Figure 7 overleaf:

Figure 7: Proposed Site Access Layout Plan submitted by the Appellant but with the Author's Annotations



5.4 Figure 8.18 of *Manual for Streets* (Department for Transport, 2007), which I have attached as Appendix K of this document, suggests that inset parallel parking bays should be a minimum of 6m x 2m. However, because both rows of parking spaces will be enclosed by a wall on one side, I consider that parallel spaces in this case need to be a minimum of 6m x 2.5m to allow the nearside car doors of large cars, like the one used in Appendix F of the appellant's Transport Statement, parked on either side of the road to be opened safely. If the appellant failed to provide parallel spaces wide enough to allow motorists to open their car doors without fear of damaging them on the walls that enclose the spaces on one side or stepping into a muddy unsurfaced area as they got out of their vehicles on the northern side of the access road, motorists could be forced to look for car parking spaces on surrounding streets that are part of the CPZ, thereby adding to already high levels of vehicular parking stress. They could also be forced to park in areas of streets with single yellow line restrictions on the highway, thereby inhibiting the safe movement of vehicular traffic, or could be forced to park informally within the proposed development which is also a shared space area. If motorists were to park vehicles parallel to the grass verges within the proposed development, this would

be likely to cause pedestrians to walk in the middle of the shared space area and come into conflict with HGVs that need to service the site such as refuse vehicles or delivery trucks. Motorists might also be forced to park in the area allocated as a turning area for service vehicles north-east of Unit 22, thereby preventing safe and suitable access to the development for refuse and emergency service vehicles. Para. 7.2.13 of *Manual for Streets* points out that one of the problems that must be avoided, in order to provide a safe environment for all road users, is the “undifferentiated surfaces leading to poor parking behaviour.” The proposed development is therefore contrary to Para. 108b of the NPPF.

5.5 Were 2.5m width on each side of the access road to be allocated to provide the parallel parking spaces proposed, this would leave a shared space width of 4.44m for all road users to access and egress the proposed development. Table 6.1 of the appellant’s transport statement shows that the residential land use within the development will create up to 3 vehicular and 8 pedestrian trips in the AM weekday peak hours and up to 4 vehicular trips and 6 pedestrian trips in the PM weekday peak hour, a person trip rate of 1 trip per 9-10 minutes. In addition to this, the appellant stated that there will be an average of four two-way delivery trips per day for the residential land use and two two-way delivery trips per day for the B1 land use. Employees of the proposed 610m² gross internal area floorspace of B1 commercial land use will generate up to 2 vehicular trips at the AM and PM weekday peak hours because of the proposed number of parking spaces provided for this land use within the development. It is not clear how many pedestrian trips the proposed B1 land use would create at the AM and PM weekday peak hours. However, the table in Section 6 of the *Employment Density Guide* (Homes and Communities Agency, 2015) (3rd Edition) that I have attached as Appendix L of this proof, indicates that the proposed B1 commercial floorspace will employ up one full-time equivalent employee (FTE) per 12-60m² net internal area floorspace, depending on what B1 category is used. Therefore, between 8 and 41 FTE employees are likely to access the proposed B1 land use per working day and between 6 and 39 of them will need to walk in and out of the site. Therefore, for example, up to 39 pedestrians egressing the development at the PM weekday peak hour could conflict on the shared space access road with four motorists who are residents driving home into the development from work. This is likely to lead to

employees within the proposed B1 commercial land use being discouraged from accessing the site by sustainable modes, which is contrary to Local Plan Policy LP44, Para. D, which I have attached as Appendix M of this proof, and to them feeling that they have no alternative but to drive to work and park on surrounding roads that already have levels of parking stress that is close to the maximum percentage of parking capacity that LBRuT will tolerate, as set out in Para. 4.5 above, or parking informally within the shared space forecourt of the proposed development, which is likely to lead to an unsafe pedestrian environment for other road users and prevent safe and suitable access to the site for large vehicles and emergency service vehicles, as described in Para. 5.4 above. My objection on these grounds could be partly lifted if the appellant entered into a legal agreement with the Local Planning Authority which precluded occupants within the proposed B1 land use from obtaining vehicular parking permits within any CPZ within the Borough of Richmond. However, this would not mitigate the risk of occupants of the B1 land use parking informally within the proposed development and, potentially, preventing safe and suitable access to the proposed development for other road users.

5.6 The appellant proposes a shared space access road width between the two proposed rows of vehicles parked parallel to the northern and southern boundary walls of the site of 4.44m. Figure 7.1 of *Manual for Streets*, which I have provided as Appendix N of this document shows that this exceeds the 4.1m running lane width needed to allow a rigid HGV of 2.3m in width to pass a pedestrian or cyclist and to allow two cars to pass each other. However, the appellant has not provided a running lane width which is wide enough to allow a car to pass a rigid HGV or a refuse vehicle or 2.5m in width. As set out on the annotated site plan in Figure 7, the only place at which HGVs can pass cars is the area marked out by and to the south of the marked out chevrons on the northern side of the access road west of the site access which is 11.6m long and 7.4m wide. The appellant has not provided a vehicle tracking drawing which showed that a refuse vehicle of 10.4m x 2.5m could pass a car safely at this point with the eastbound or egressing vehicle having a safe clearance length to enable them to manoeuvre in and out of the passing bay marked with chevrons in forward gear without colliding with vehicles parked on the northern side of the road or the northern boundary wall. There is no minimum

design standard for a passing place or refuge within a mixed-use development of this type, but it should be at least twice the length of the largest vehicle it is likely to accommodate. The lack of appropriate clearance at this passing point is likely to lead to vehicles reversing long distances along the access road in a westerly direction where they would be more likely to conflict with non-motorised users. Failure to provide a passing place for motor vehicles of adequate dimensions on the proposed access road is likely to lead to vehicles having to reverse long distances back into the proposed development, which is likely to increase the likelihood of collisions between reversing vehicles and other road users, and is also likely to force vehicles entering the proposed development in a westerly direction to reverse back on to Arlington Road east of the proposed access, increasing the risk of collisions between these vehicles and other motor vehicles using the carriageway on Arlington Road. As the photograph in Figure 4 shows, this part of Arlington Road has two footway CPZ bays and a carriageway width between parked vehicles and the verge to the north of 3.6m. The proposed development is therefore contrary to Para. 108b of the NPPF.

5.7 Immediately east of Unit 1 on the proposed site plan there is a sharp bend in the shared space area in an easterly direction as road users transition from the forecourt of the development site on to the access road. The appellant's vehicle tracking drawing shows that the nearside overhang a refuse vehicle of 10.4m x 2.5m conflicts with the grass verge on the both sides of the forecourt as it transitions between the shared space access road and forecourt, and that the tail of the refuse vehicle conflicts with the grass verge at the eastern edge of the turning area. I have included the vehicle tracking drawings as Figure 8 below:

Figure 8: Vehicle Tracking for a Refuse Vehicle provided by the Appellant but with the Author's Annotations



5.8 The close proximity of part of the public realm within the development, such as verges, to refuse vehicles of 10.4m x 2.5m as their drivers enter, turn in, and egress the development in forward gear, could lead to refuse operatives deciding to reverse along the access road, stop their refuse vehicle on it, and walk between the refuse collection points and the vehicle. There is approximately 50m walking distance between the refuse collection point north-east of Unit 22 and the western end of the access road east of the bend. This is contrary to Part 4.2 of LBRuT's *Refuse and Recycling Storage Requirements Supplementary Planning Document*, which I have attached as Appendix O of this proof, which states that refuse operatives should not be required to carry waste sacks or move wheeled bins a distance of more than 20m in total. It is also contrary to Part 4.3 of the same document which recommends a maximum reversing distance for refuse vehicles to access to get within 20m of a refuse collection point of 12m. Forcing operatives of large vehicles to reverse a distance of approximately 53m is likely to lead to conflicts with other road users and is also likely to prevent safe and suitable access

to the development for other road users as refuse operatives are forced to stop their vehicle on the access road east of the bend they and wheel bins a distance of 50m from one of the two collection points to the vehicle and back again. Therefore, the proposed development is contrary to Paras. 4.2 and 4.3 of the and *Recycling Storage Requirements Supplementary Planning Document* and to Para. 108b of the NPPF. My objection on these grounds could be lifted if the appellant were to agree to have household refuse and recycling collected from the development in a smaller vehicle than a standard refuse vehicle. It is likely that this could have to be done through a private contractor. This could be secured through a pre-commencement planning condition.

5.9 The appellant proposes a shared space access road with a running lane width for all road users of 4.44m between a row of up to 7 cars parked parallel to the northern boundary wall of the development on its northern side and a row of up to 5 vehicles parked parallel to the back wall of the under-croft of a commercial building south of the red line boundary of the development. The placing of parked cars between the building line of the commercial building to the south of the access road and the boundary wall to the north means that blind and partially sighted pedestrians will not have a building or wall line to follow and use as their guide. This is contrary to Para. 3.13 of *Local Transport Note 1/11: Shared Space*, which I have included as Appendix P of this document. The failure to provide a safe guide for blind and partially sighted pedestrians is likely to lead to them wandering into the middle of the access road where they are likely to conflict with vehicles and other road users. I therefore conclude that the proposed development fails to provide safe and suitable access for disabled road users and is therefore contrary to Para. 108b of the NPPF.

5.10 As set out in Figure 7 and Appendix C, the appellant intends to provide five vehicular parking parallel vehicular parking spaces for use by employees of Twickenham Film Studios in an area immediately south of the red line boundary of their site. They require this arrangement to be able to provide their shared space access road running lane width of 4.44m. I have attached the Land Registry Title Plan for Title Number SGL280384 and the accompanying document as Appendix Q of this document. This shows that the appellant has an area of approximately

6.5m in width between the northern boundary wall and the southern edge of their red line along the access road. Land Registry Title Plan for Title Number TG110887 and Part A, Para. 5 of the accompanying document that I have provided as Appendix R of this proof appears to indicate that Twickenham Film Studios, in their position as occupiers and owners of the building numbered 10 on the attached title plan, have rights of way over the entire length of the access road (referred to as the land “tinted brown” in Para. 5 of the register). It is unclear whether this includes the right to park vehicles perpendicular to the access road in marked out bays. Therefore, the appellant might have some third party rights to provide their proposed parking layout along the access road and stop the users of the current under-croft parking spaces parking perpendicular to the access road. Failure to demonstrate that they can do this is likely to mean that the appellant will be unable to provide their proposed parking layout and their proposed shared space access road running lane width of 4.44m. The only way they could provide this running lane width with employees of the Film Studios parking perpendicular to the access road would be if they took away the 7 spaces on the northern side of the access road. This would increase overspill parking stress on surrounding streets above what LBRuT regard as the maximum level of stress and could also lead to unsafe informal vehicular parking within the development or on areas of the highway with single yellow line restrictions. This is likely to prevent safe and suitable access to the road network and the development for other road users which is contrary to Para. 108b of the NPPF.

6. Areas of Disagreement

6.1 Para. 2.4, Bullet Point 1 of the Statement of Disagreement asks whether the proposed development would lead to overspill parking on surrounding streets contrary to Local Plan Policy LP45. The proposed development has a PTAL of 3. Para. 11.2.3 of the Local Plan states that maximum parking standards set out in Appendix 3 of the Local Plan should be met. The appellant would need to provide 31 spaces for the residential land use to meet the maximum standards but has proposed 21 off-street vehicular parking spaces, a shortfall of 10 spaces. As set out in Para. 4.5 of this proof, LBRuT’s Richmond Parking Survey Methodology defines overspill parking as the maximum required number of off-street spaces

minus those proposed. As set out in Part 4 of this proof, the residential aspect of the proposed development is likely to create overspill vehicular parking of up to 10 vehicles on streets surveyed by the appellant as part of their transport statement which will increase on-street parking stress to an average of 87% when measured against the survey results. This is above what LBRuT considers acceptable, as set out in Para. 4.5 of this proof. The proposed 610m² of commercial floorspace would not create any overspill parking because the appellant has met the maximum off-street standards for this land use.

6.2 Para. 2.4, bullet point 2 of the Statement of Disagreement asks whether the proposal would lead to vehicles that currently park south of the access road being displaced and whether a vehicular parking stress survey has been submitted to show that these vehicles can be parked on streets within 500m walking distance of the site. In my view, the change in parking layout south of the access road set out in Figure 7 and Appendix C would lead to the displacement of up to 13 vehicles that currently use these perpendicular spaces. Seven of the current 18 spaces are used by employees of Twickenham Film Studios, an address that is entitled to on-street vehicular parking permits within the local CPZ. The two vehicles that will be displaced from the spaces they use will be eligible to apply for on-street vehicular parking permits. The appellant has not provided any information about who uses the other 11 spaces. The motorists that use them might be eligible to apply for CPZ parking permits depending on whether their place of work or home address is entitled to permits. Therefore, LBRuT might have to accommodate overspill of up to 13 vehicles on streets within 500m walking distance of the site during the working day, and 11 during the night in addition to the 10 mentioned in Para. 6.1. The appellant has not provided a vehicular parking stress survey which would need to show that up to 13 vehicles could be accommodated on streets within 500m walking distance of the site access during the standard working day without pushing levels of on-street parking stress above the level of 85% of total capacity. This could lead to unsafe parking on local roads and is contrary to Local Plan Policy LP45, Para. 11.2.3 of the Local Plan, the *Lambeth Parking Survey Methodology*, the *Richmond Parking Survey Methodology*, and Para. 108b of the NPPF.

6.3 Para. 2.4, bullet point 3 of the Statement of Disagreement asks whether the appellant has demonstrated that they have control of the land south of the access road outside of their red line to enable them to make motorists using the area to park to do so parallel to the carriageway. As stated in Para. 5.10 above, Appendix C and the Land Registry Title Plan and Property Register for Title Number TGL110887 (see Appendix R) indicates that Twickenham Film Studios own the freehold to the under-croft area south of the red line which is approximately 2.4m wide between the red line and the back wall of the under-croft area of the building marked as Building No. 10 on the title plan. Para. 5, Page 1 of the attached property register indicates that the occupants of Building No. 10 have rights of way over the access road controlled by the appellant which described as “tinted brown” in Para. 5 of the register. It is unclear whether this right includes the right to use the existing marked out perpendicular parking bays which are partly in the access road, and is therefore unclear what the appellant must do to secure their proposed parking layout on the southern side of the access road.

6.4 Para. 2.6, bullet point 2 asks whether the co-location of residential and commercial uses would lead to a conflict between users, and impact on the proposed commercial use operation and the safety/amenity of proposed residential occupants. As set out in Para. 5.5, up to four vehicles used by residents could conflict with up to 39 employees of the B1 land use on access road in the PM weekday peak hour, depending on what type of B1 commercial land use is proposed and the likely number of FTE employees per square metre of net internal area floorspace. The appellant stated that the commercial land use would generate up to two two-way delivery vehicular trips per day but did not state which vehicles these would be carried out in and did not provide any vehicular tracking drawings which showed that either a flat-bed truck of 8m x 2.3m or a light good vehicle could enter, turn in, and exit the site in forward gear. However, the displacement of some vehicles as a result of the change in parking layout on the access road could lead to displaced motorists attempting to park in the development in the shared space areas which could prevent safe access to parts of it. As set out in Part 5 of this proof, the shared space access road has a running lane width between two rows of parked cars of 4.44m. While this is wide enough to allow a rigid HGV to pass a cyclist, as shown in Figure 7.1 of *Manual for Streets*, the layout of this particular

access road cannot, in my view, accommodate a 10.4m x 2.5m domestic refuse vehicle safely, which is likely to make the shared space area unattractive and unsafe for all occupants to walk in and would compel occupants to try and access the site by private car. Blind and partially sighted users would also find the shared space access road difficult to use safely because there would be no building line for them to navigate by.

6.5 Para. 2.6, bullet point 3 asks whether there is sufficient evidence to demonstrate that the scheme will maintain sufficient space on the shared space carriageway to allow a car to pass a heavy goods vehicle carrying refuse or recycling safely. As set out in part 5 of this proof, the access road has a shared space running lane width of 4.44m if the appellant can provide their proposed parking layout on it. This would need to be widened to 4.8m to allow a car to pass a heavy goods vehicle safely, as set out in Figure. 7.1 of *Manual for Streets*. The appellant provides only one passing space for motorists to pass each other on the access road, an area of 11.6m x 2.4m marked out by chevrons opposite the access to a forecourt of a building used by Twickenham Film Studios. This is set out in Figure 7 and Appendix C. The appellant has not provided any vehicle tracking drawing which shows that a car can pass a refuse vehicle safely at this location or that the area is long and wide enough for a refuse vehicle of 10.4m in length to enter into and egress from in forward gear. The failure to provide a running lane width of 4.8m or an appropriate vehicular passing bay is likely to lead to vehicles reversing long distances along the access road and on to the highway east of the site which could bring them into conflict with other road users.

7. Conclusion

7.1 The proposed development has a PTAL of 3 and is within the East Twickenham CPZ. The maximum vehicular parking standards set out in Appendix 3 of the Local Plan state that up to one off-street vehicular parking space would need to be provided for every 1-2 bedroomed dwelling and up to two off-street vehicular parking spaces should be provided for every dwelling that has three or more bedrooms. Local Plan Policy LP45, Para.1 and Para. 11.2.3 state that maximum vehicular parking standards should be met in areas with a PTAL level of 0-3. The appellant would need to provide 31 spaces for the residential land use to meet the

maximum standard and has proposed 21 spaces. This is likely to create vehicular parking overspill of up to 10 vehicles on roads and streets within 200m walking distance of the site. The appellant's vehicular parking stress survey shows that this is likely to push on-street vehicular parking stress to an average level of 87% throughout the week. This is above the level 85% on-street vehicular parking stress that LBRuT's supplementary planning guidance deems acceptable. The proposed development is therefore contrary to Local Plan Policy LP45, Para. 1 and Para. 11.2.3 of the Local Plan. However, my concerns would be met if the appellant submits a suitably worded legal agreement under S106 of the Town and Country Planning Act 1990 which prohibits all occupants of the proposed development from obtaining vehicular parking permits within any CPZ in the Borough of Richmond, that secures the obligation for the appellant to provide a travel plan for each land use, and includes an obligation for the appellant to fund two years' worth of membership of a local car club for all residents. This request is legitimate under Para. 108c of the NPPF because it cost effectively mitigates a negative transport impact of this development to an acceptable degree by reducing the risk of unsafe vehicular parking, either on the highway or within the development, and ensures occupants have alternatives to the private car.

7.2 The appellant has not provided any spaces with electric vehicle charging points within the proposed development. This is contrary to Para. 11.2.5 of the Local Plan and to the residential vehicular parking standards set out in Part 6.2 of the current London Plan. My concern would be met if the appellant agreed to provide 20% of their proposed parking spaces with active means of electric vehicle charging and 20% with passive means of electric vehicle charging. This could be secured through a planning condition.

7.3 The appellant's proposed parking layout south of the red line at the southern edge of the access road would result in the net displacement of 13 vehicles, two from Twickenham Film Studios and 11 private users. Employees of Twickenham Film Studios are eligible for vehicular parking permits within CPZ Zone F, and the individuals might be, depending on their workplace or home addresses. The appellant has not provided a vehicular parking stress survey which shows that overspill of up to 13 vehicles can be accommodated on all roads within 500m

walking distance of the site. This is contrary to Para. 11.2.3 of the Local Plan and is also contrary to Para. 108b of the NPPF because the overspill is likely to lead to unsafe parking on local streets or within the development.

7.4 The appellant proposes a shared space private access road as set out in Appendix C and Figure 7 of this document. This is 53m long and is enclosed by boundary walls on both its northern and southern sides. The appellant proposes parallel parking bays along its entire length apart from a length of 11.6m just west of its access on to Arlington Road. West of this area the access road has a total width of 9.44m between the two boundary walls. The appellant proposes to mark out parallel parking bays which would need to be 2.5m wide to allow motorists to open nearside car doors safely, giving a total running lane width for all road users of 4.44m. This is below the minimum required safe width of 4.8m which would allow a car to pass an HGV safely as set out in Fig. 7.1 of *Manual for Streets*. The appellant has not provided a vehicle tracking drawing to show that vehicles can use the proposed passing area safely. This is likely to lead to motorists reversing long distances which would bring them into conflict with other road users in the development or on the highway. The proposed development is therefore contrary to Para. 108b of the NPPF because the appellant has not demonstrated that they can provide safe and suitable access to the development for all road users. I ask that the appeal is dismissed because of this.

7.5 The layout of the shared space access road with parking bays either side of it and a running lane width of 4.44m is likely to be difficult to use for blind or partially sighted pedestrians because they will not have a wall or building line to act as a guide. Other vulnerable road users such as parents with small children would find the road difficult to use because of the lack of refuge or separation from vehicular traffic. The proposal is therefore contrary to Para. 108b of the NPPF because it does not provide safe and suitable access to the development for disabled and vulnerable road users.

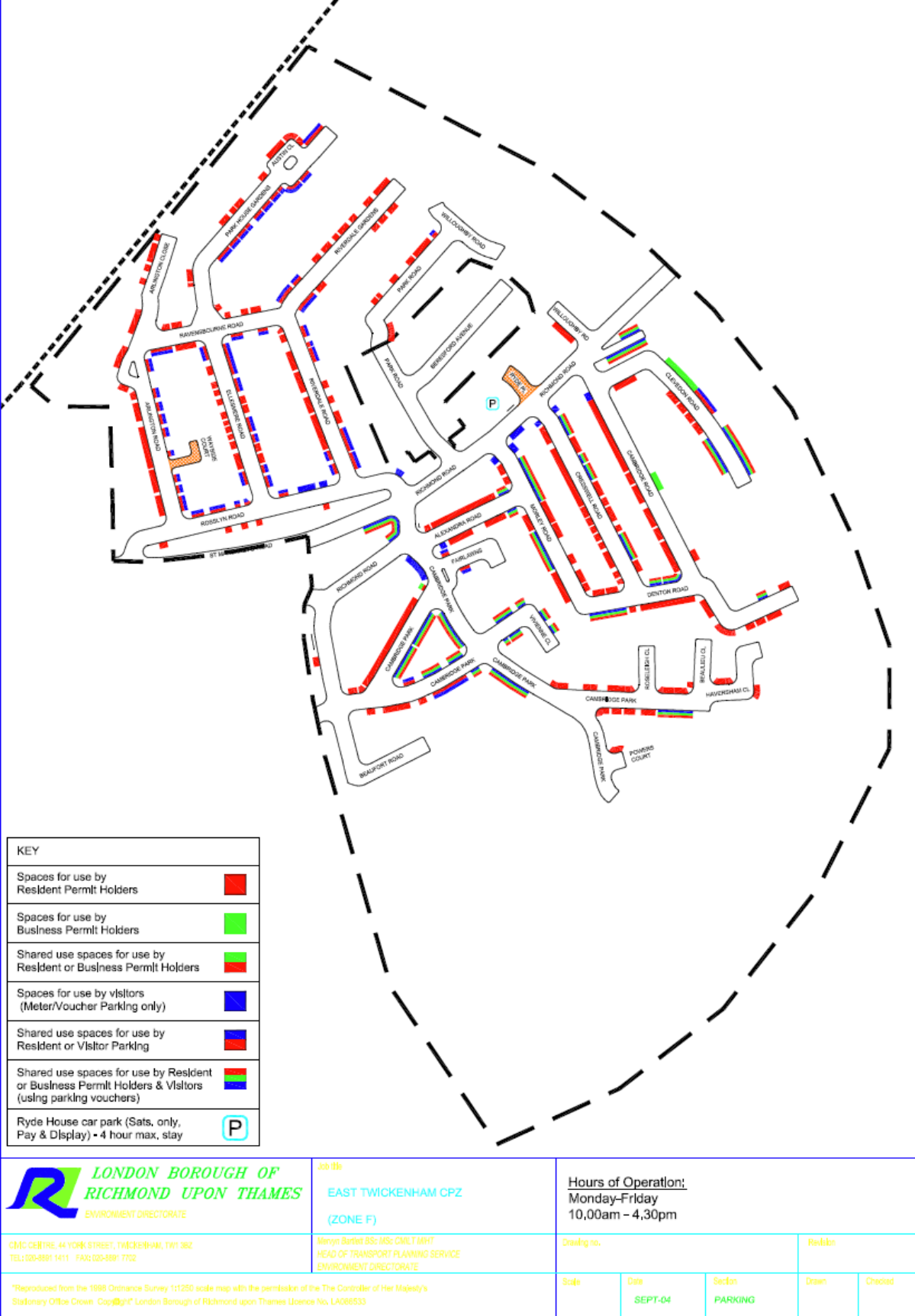
7.6 The appellant's own vehicle tracking drawings show that a refuse vehicle of 10.4m x 2.5m would not be able to enter, turn in, and exit the development in forward gear without coming into conflict with parts of the public realm in the development. This

could lead to refuse collectors reversing the vehicle 53m along the access road, in a westerly direction, to a point east of the bend described in Section 5 and carrying/dragging bins up to 50m to the vehicle. My concerns on this point could be met if the appellant agreed to service the development with a smaller refuse vehicle, possibly provided by a private contractor. This could be secured via a planning condition.

7.7 The appellant intends to provide five parallel vehicular parking spaces on the southern side of the access road immediately south of the red line boundary shown on the site plan in Appendix C and in Figure 7. This area is currently used by 18 motorists who park perpendicular to the road in marked out perpendicular spaces that measure 4.8m x 2.4m. Seven of these spaces are used by employees of Twickenham Film Studios and 11 by private individuals. Land Registry Title Plan TGL110887 and the accompanying property register indicates that Twickenham Film Studios, in their guise as occupants of the building south of the access road have the benefit of rights of way over the entire length of the access road. The appellant has not demonstrated that they have enough control of the rights of way over this land to ensure that motorists will park parallel to the road as they propose. If they were unable to do this but still intended to provide the 7 parallel parking bays on the northern side of the road, this would leave a shared space running lane width of 2.14m which would not be enough road width to allow safe and suitable access to the development for all road users because most cars are at least 1.9m wide. I request that the appeal is dismissed because the appellant, by not demonstrating that they have control of the rights of way over land along the access road, has not set out how they can make motorists to park parallel to the road, and has failed to demonstrate that they can provide safe and suitable access to the development for all road users in accordance with Para. 108b of the NPPF.

[illegible]

Appendix B: Map of CPZ Zone F – East Twickenham (London Borough of Richmond, 2018)



Appendix C: Plan No. 4786-3-10-B (provided by the appellant with the planning application)



Appendix D: Local Plan Policy LP45 (taken from the London Borough of Richmond's adopted Local Plan, 2018)

Policy LP 45

Parking Standards and Servicing

Parking standards

The Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car based travel including on the operation of the road network and local environment, and ensuring making the best use of land. It will achieve this by:

1. Requiring new development to provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points, in accordance with the standards set out in Appendix 3. Opportunities to minimise car parking through its shared use will be encouraged.
2. Resisting the provision of front garden car parking unless it can be demonstrated that:
 - a. there would be no material impact on road or pedestrian safety;
 - b. there would be no harmful impact on the character of the area, including the streetscape or setting of the property, in line with the policies on Local Character and Design; and
 - c. the existing on-street demand is less than available capacity.
3. Car free housing developments may be appropriate in locations with high public transport accessibility, such as areas with a PTAL of 5 or 6, subject to:
 - a. the provision of disabled parking;
 - b. appropriate servicing arrangements; and
 - c. demonstrating that proper controls can be put in place to ensure that the proposal will not contribute to on-street parking stress in the locality.

All proposals for car free housing will need to be supported by the submission of a Travel Plan.

4. Managing the level of publicly available car parking to support the vitality and viability of town and local centres within the borough whilst limiting its impacts on the road network.

Freight and Servicing

New major development which involves freight movements and has servicing needs will be required to demonstrate through the submission of a Delivery and Servicing Plan and Construction and Logistics Plan that it creates no severe impacts on the efficient and safe operation of the road network and no material harm to the living conditions of nearby residents.

Appendix E: Maximum Off-street vehicular parking Standards adopted by the London Borough of Richmond (London Borough of Richmond Local Plan, 2018)

| LAND USE | PARKING STANDARD | CYCLE PARKING STANDARD |
|---|--|------------------------------------|
| RESIDENTIAL (including conversion/extension of existing) | | |
| | PTALs 0-3: 1- 2 bedrooms, 1 space | As per London Plan |
| | PTALs 0-3: 3+ bedrooms, 2 spaces | As per London Plan |
| | PTALs 4-6: as per London Plan although local circumstances, CPZ times and on-street parking conditions will need to be assessed. | As per London Plan |

Appendix F: Para. 11.2.2 of the London Borough of Richmond's Local Plan (2018)

This policy covers the parking standards for new developments of all types. Parking must be sensitively located and designed and suitably landscaped to minimise visual intrusion and disturbance. To maintain enough parking space within new developments, the parking provision will be expected to be legally tied to the development that it serves. In areas controlled by a Community Parking Zone, occupiers of new residential developments may not be eligible for resident or visitor on-street parking permits where existing levels of on-street parking are very high. This restriction would be secured by excluding the address from the schedule of streets in the relevant road traffic order that created or creates the Controlled Parking Zone in which the property is situated, by restricting under section 106 of the Town and Country Planning Act 1990 the disposal of an interest in relevant properties unless a person disposing advises the person acquiring of the non-availability of residents or business on-street parking permits and/or through Section 16 of the Greater London Council (General Powers) Act 1974 (or any statute revoking or re-enacting that Act).

Appendix G: Para. 108c of the National Planning Policy Framework (NPPF) (HM Government, 2019)

108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users; and*
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

Appendix H: Extract from the Lambeth Parking Survey Methodology (London Borough of Lambeth, 2012)

Commercial Developments

Surveys for commercial developments should cover an area within 500m walking distance (or a 5 minute walk) of a site. For further detail, see 'Extent of survey' below. Surveys should generally be done during proposed opening hours on an hourly beat basis.

Excluding the extent and time of the surveys the same principles apply as a survey for a residential development as set out below, but developers should contact the Council for further advice.

Survey times

For sites close to any of the following land uses, additional survey times may be necessary:

- Town centre locations: surveys should be undertaken Monday-Wednesday only.
- Regular specific evening uses close to the site (eg. church, etc): additional surveys should be undertaken when these uses are in operation.
- Commercial uses close to the site: morning and early evening surveys may also be required due to conflict with commuter parking. In these cases surveys between the hours of 0700-0830 and 1800-1900 may be required, noting the amount of parking on a 15-minute basis over this time.
- Railway stations/areas of commuter parking: additional morning and evening peak hour surveys will be required in order to assess the impact of commuter parking. These should be done between 0700-0800 and 1730-1830.

Appendix I: Adopted London Plan, Chapter 6.13, Table 6.2: Car Parking Standards (Greater London Authority, 2016)

Maximum parking standards

| Maximum residential parking standards | | | |
|--|------------------|--------------------|----------------------|
| number of beds | 4 or more | 3 | 1-2 |
| parking spaces | up to 2 per unit | up to 1.5 per unit | less than 1 per unit |
| <p>Notes:</p> <p>All developments in areas of good public transport accessibility (in all parts of London) should aim for significantly less than 1 space per unit</p> <p>Adequate parking spaces for disabled people must be provided preferably on-site^[1]</p> <p>20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.</p> <p>In outer London areas with low PTAL (generally PTALs 0-1), boroughs should consider higher levels of provision, especially to address 'overspill' parking pressures.</p> | | | |

Appendix J: Para. 11.2.5 of London Borough of Richmond's Current Local Plan (2018)

11.2.5 Car share facilities and car clubs will be encouraged, but these may not obviate the need for adequate off-street parking provision. Charging facilities for electric vehicles will have to be provided in line with the standards set out in the London Plan, which requires 20% active provision (i.e. fully installed from the outset) plus 20% passive provision (i.e. cabling provided for easier future installation of charging equipment) in residential developments, and 10% active provision plus 10% passive provision in all other developments.

Appendix K: Figure 8.18 of *Manual for Streets* (Department for Transport, 2007)

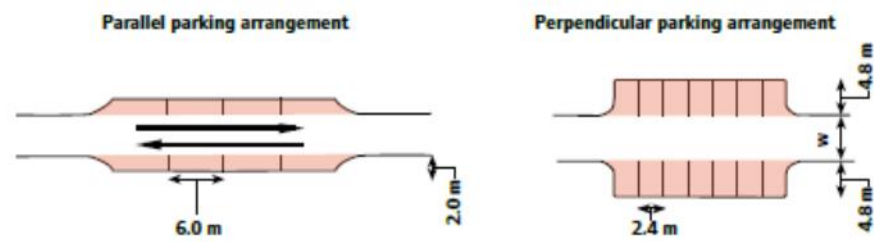


Figure 8.18 Suggested parallel and perpendicular parking arrangements.

Appendix L: Part 6, Employment Density Guide (3rd Edition) (Homes and Communities Agency, 2015)

6. Comparison of densities 2015 to 2010

| Use Class | Sub-Category | Sub-Sector | 2015 Density (sqm) | 2010 Density (sqm) |
|---------------------|---|-------------------------------------|--------------------|--|
| B1a Offices | General Office (NIA) | Corporate | 13 | 12 |
| | | Professional Services | 12 | |
| | | Public Sector | 12 | |
| | | Tech | 11 | |
| | | Finance & Insurance | 10 | |
| | Call Centres (NIA) | | 8 | 8 |
| B1b | R&D Space (NIA) | | 40-60 | n/a |
| B1c | Light Industrial (NIA) | | 47 | 47 |
| B2 | Industrial & Manufacturing (GIA) | | 36 | 36 |
| B8 | Storage & Distribution (GEA) | National Distribution Centre | 95 | General: 70 Large Scale & High Bay Warehousing: 80 |
| | | Regional Distribution Centre | 77 | |
| | | 'Final Mile' Distribution Centre | 70 | |
| Mixed B Class | Small Business Workspace | Incubator | 30-60 | Serviced Office: 10 <i>Detailed explanation for the changes in this category are provided in Section 3 Para's 3.77-3.82</i> |
| | | Maker Spaces | 15-40 | |
| | | Studio | 20-40 | |
| | | Co-Working | 10-15 | |
| | | Managed Workspace | 12-47 | |
| B8 / Sui Generis | Data Centres | Wholesale | 200-950 | 47 <i>Detailed explanation for the changes in this category are provided in Section 3 Para's 3.85-3.88</i> |
| | | Wholesale Dark Site | 440-1,400 | |
| | | Co-location Facility | 180-540 | |
| A1 | Retail (NIA) | High Street | 15-20 | 19 |
| | | Foodstore | 15-20 | 17 |
| | | Retail Warehouse | 90 | 90 |
| A2 | Finance & Professional Services (NIA) | | 16 | 16 |
| A3 | Restaurants & Cafes (NIA) | | 15-20 | 18 |
| C1 | Hotels | Limited Service / Budget | 1 per 5 beds | Budget: 1 per 3 beds General: 1 per 2 beds 4/5 Star: 1 per 1 beds |
| | | Mid scale | 1 per 3 beds | |
| | | Upscale | 1 per 2 beds | |
| | | Luxury | 1 per 1 bed | |
| D2 | Fitness Centres | Budget | 100 | Sports Centres & Private Clubs: 65 |
| | | Mid Market | 65 | |
| | | Family | | |
| | Cinema (GIA) | | 200 | 90 <i>Detailed explanation for the changes in this category are provided in Section 3 Para's 3.92-3.95</i> |
| | Visitor & Cultural Attractions (GIA) | | 30-300 | 36 <i>Further Guidance is provided in Section 5 Para's 5.14-5.16</i> |
| | Amusement & Entertainment Centres (GIA) | | 70 | 70 |

Appendix M: Local Plan Policy LP44 (London Borough of Richmond, 2018)

11.1 Sustainable Travel Choices

Policy LP 44

Sustainable Travel Choices

The Council will work in partnership to promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions, and maximise opportunities including for health benefits and providing access to services, facilities and employment. The Council will:

A. Location of development

Encourage high trip generating development to be located in areas with good public transport with sufficient capacity, or which are capable of supporting improvements to provide good public transport accessibility and capacity, taking account of local character and context.

B. Walking and cycling

Ensure that new development is designed to maximise permeability within and to the immediate vicinity of the development site through the provision of safe and convenient walking and cycling routes, and to provide opportunities for walking and cycling, including through the provision of links and enhancements to existing networks.

C. Public transport

Ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services. Proposals will be expected to support improvements to existing services and infrastructure where no capacity currently exists or is planned to be provided.

Protect existing public transport interchange facilities unless suitable alternative facilities can be provided which ensure the maintenance of the existing public transport operations. Applications will need to include details setting out how such re-provision will be secured and provided in a timely manner.

D. The road network

Ensure that new development does not have a severe impact on the operation, safety or accessibility to the local or strategic highway networks. Any impacts on the local or strategic highway networks, arising from the development itself or the cumulative effects of development, including in relation to on-street parking, should be mitigated through the provision of, or contributions towards, necessary and relevant transport improvements.

In assessing planning applications the cumulative impacts of development on the transport network will be taken into account. Planning applications will need to be supported by the provision of a Transport Assessment if it is a major development, and a Transport Statement if it is a minor development.

E. River transport

Encourage the use of the River Thames for passenger and freight transport through the protection of, improvement to, and provision of new relevant infrastructure including wharves, slipways and piers.

F. Safeguarding of routes and facilities

Land required for proposed transport schemes as identified in the London Plan and the Council's Local Implementation Plan for Transport will be protected from developments which would prevent their proper implementation.

Local filling stations and supporting services such as car repair facilities will be protected from redevelopment for alternative uses unless exceptional circumstances can be demonstrated that warrant their loss.

Appendix N: Figure 7.1 of *Manual for Streets* (Department for Transport, 2007)

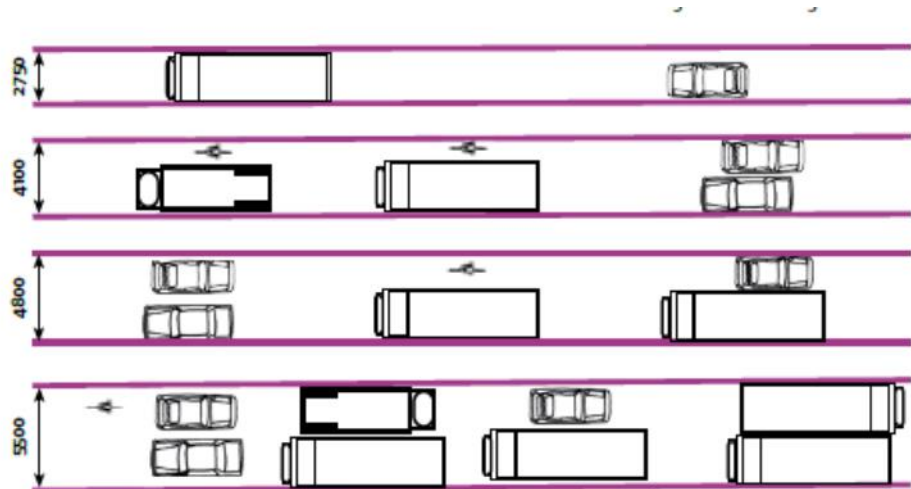


Figure 7.1 Illustrates what various carriageway widths can accommodate. They are not necessarily recommendations.

Appendix O: Extract from Refuse and Recycling Storage Requirements Supplementary Planning Document (London Borough of Richmond, 2015)

4.2. Carry and push distances for the collection of refuse and recycling

- Waste collection operatives should not be required to carry waste sacks, dustbins or move wheeled bins more than 20 metres in total.
- Storage areas for residential dwellings should be sited so that the occupiers are not required to carry refuse or recycling more than 30 metres from an external door.
- In residential dwellings, consideration should be given to access for disabled persons, where appropriate.

4.3. Vehicle access

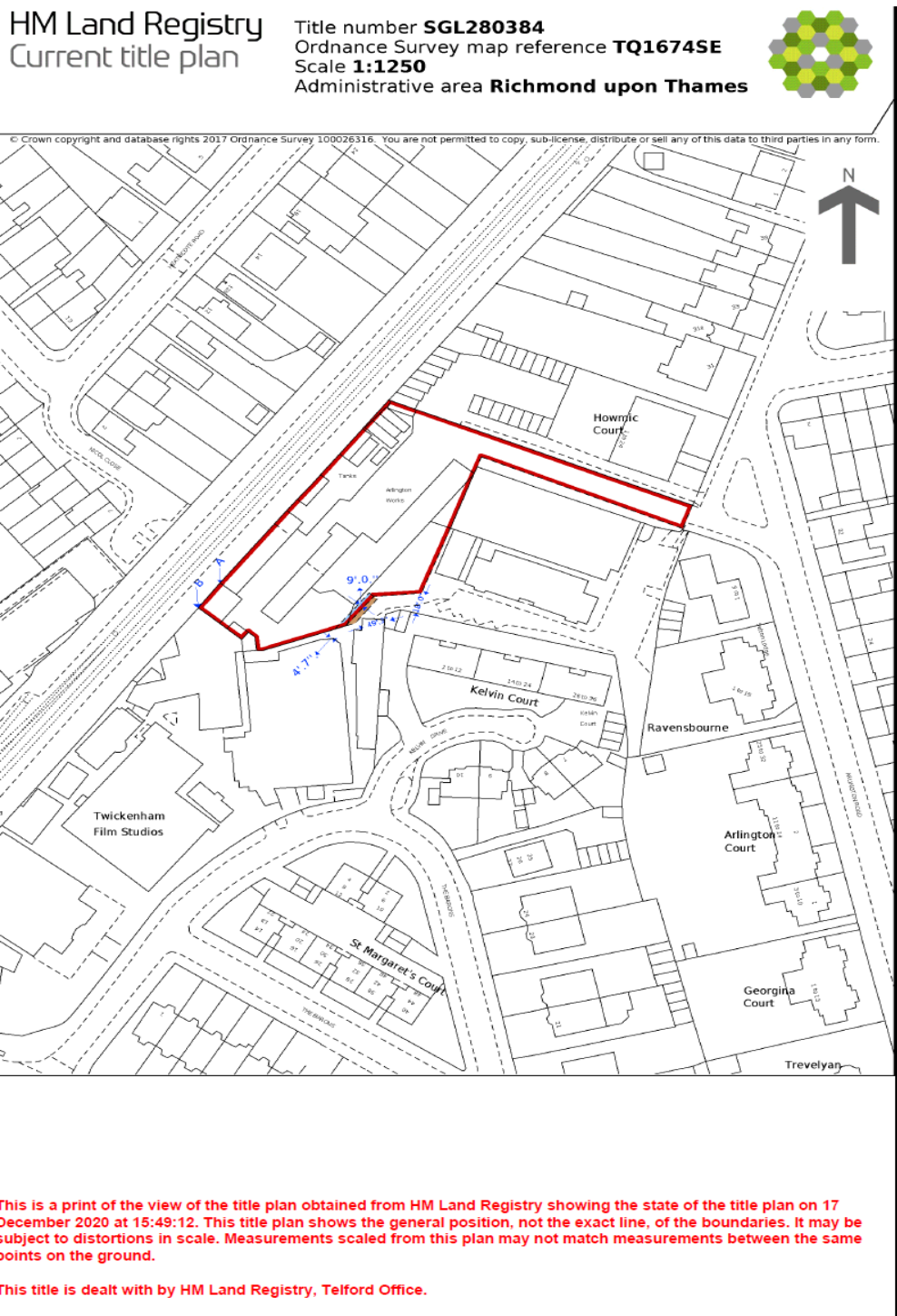
- Reversing incidents account for a disproportionate number of accidents involving waste collection vehicles. As such, the need for reversing by vehicles should be avoided wherever possible.
- In the event that it is not possible to create permeable through routes for collection vehicles, British Standard (BS 5906: 2005) recommends a maximum reversing distance for vehicles of 12m.
- Greater distances may be acceptable within functional limits where this would allow for substantial gains in other aspects of design. Whatever the distance agreed, any reversing routes should be straight and free from obstacles and visual obstructions.

Appendix P: Extract from Local Transport Note 1/11: Shared Space (Department for Transport, 2011)

Visual impairment

- 3.12** About 2 million people in the UK have some form of visual impairment. Of these, around 95% have a degree of residual vision. This highlights the importance of tonal contrast in aiding navigation. Blind and partially sighted people may use one or more mobility aids, including indicator canes, long canes and guide dogs. Most do not use any mobility aid.
- 3.13** Evidence suggests that the most important navigation feature for blind and partially sighted people is the building line, and this is best kept uncluttered by temporary obstructions such as A-boards. Temporary obstructions present a particular problem, as their locations cannot be 'learned'. A 'touch-shore-line' is conventionally provided by the kerb. If the context and objectives of a shared space scheme proposal indicate that a kerb-free design is desirable, mitigating measures may be required.
- 3.14** For many partially sighted people, tonal contrast is especially useful in enabling them to perceive boundaries such as the edge of the carriageway or the comfort space. However, complicated surface patterns can be confusing and disorientating, and this needs to be taken into account when incorporating them into street designs.

Appendix Q: Title Plan and Extract from Property Register for Title Number SGL280384, Arlington Works (HM Land Registry, 2020)



THIS IS A PRINT OF THE VIEW OF THE REGISTER OBTAINED FROM HM LAND REGISTRY SHOWING THE ENTRIES SUBSISTING IN THE REGISTER ON 17 DEC 2020 AT 15:48:37. BUT PLEASE NOTE THAT THIS REGISTER VIEW IS NOT ADMISSIBLE IN A COURT IN THE SAME WAY AS AN OFFICIAL COPY WITHIN THE MEANING OF S.67 LAND REGISTRATION ACT 2002. UNLIKE AN OFFICIAL COPY IT MAY NOT ENTITLE A PERSON TO BE INDEMNIFIED BY THE REGISTRAR IF HE OR SHE SUFFERS LOSS BY REASON OF A MISTAKE CONTAINED WITHIN IT. THE ENTRIES SHOWN DO NOT TAKE ACCOUNT OF ANY APPLICATIONS PENDING IN HM LAND REGISTRY. FOR SEARCH PURPOSES THE ABOVE DATE SHOULD BE USED AS THE SEARCH FROM DATE.

THIS TITLE IS DEALT WITH BY HM LAND REGISTRY, TELFORD OFFICE.

TITLE NUMBER: SGL280384

There is no application or official search pending against this title.

A: Property Register

This register describes the land and estate comprised in the title.

RICHMOND UPON THAMES

- 1 (10.08.1959) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being Arlington Works and 21, 23, 25 and 27 Arlington Road and part of the site of Arlington Road.
- 2 The land has the benefit of a right of way over the land tinted brown on the filed plan.
- 3 A Transfer of land adjoining the South Western boundary of the land in this title dated 9 February 1960 made between (1) Brian Geoffrey Roads and (2) Twickenham Film Studios Limited contains the following provision:-

"As between the land hereby transferred and the adjoining land retained by the Transferor he the transferor for himself and his successors in title shall not become entitled to any right of light or air in respect of the land hereby transferred."
- 4 (19.06.2017) A new title plan showing an amended extent based on the latest revision of the Ordnance Survey Map has been prepared.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (08.04.1981) PROPRIETOR: SHARPE REFINERY SERVICE (HYDRO CARBONS) LIMITED (Co. Regn. No. 1393706) of Arlington Works, Arlington Road, Twickenham, Middx.

C: Charges Register

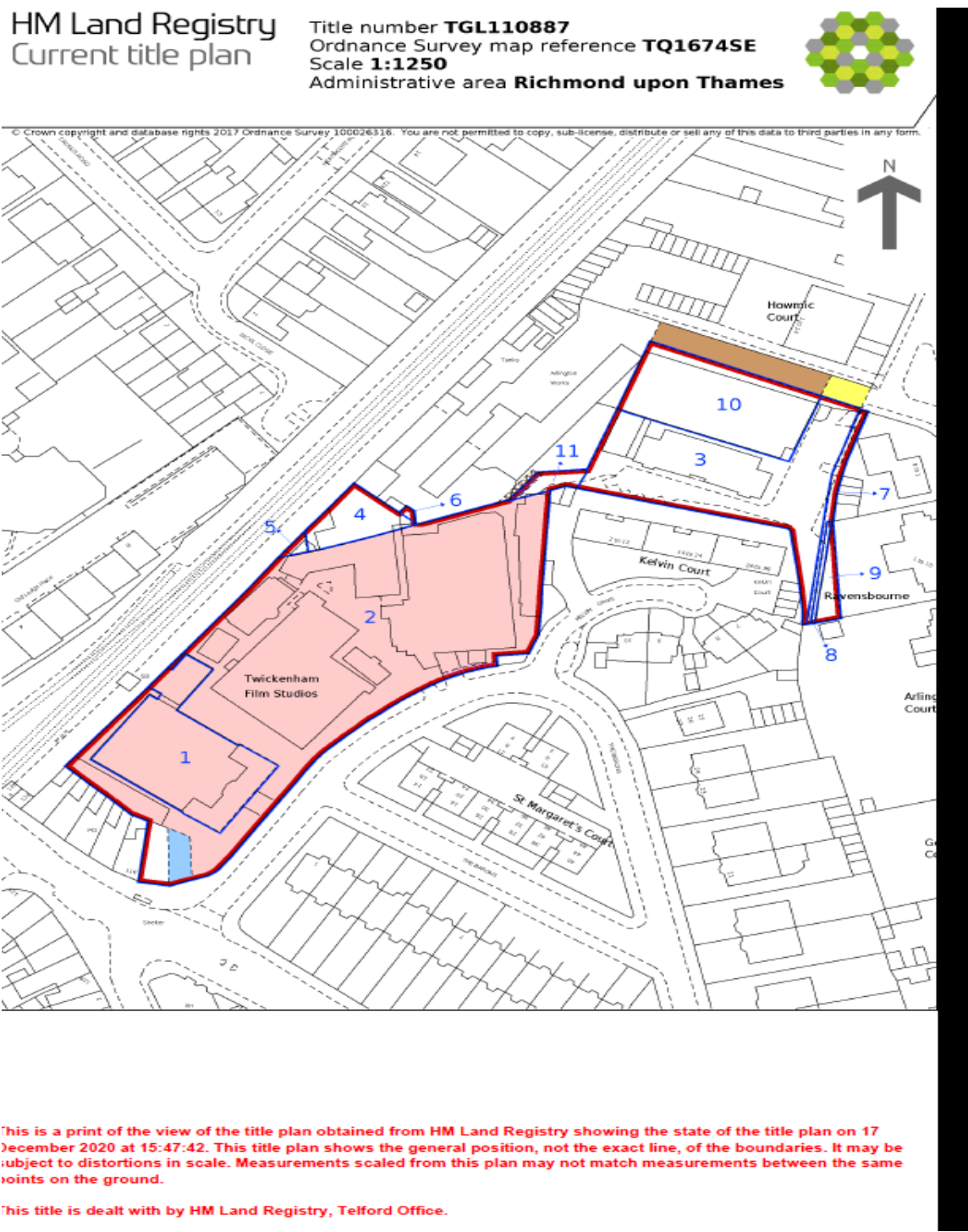
This register contains any charges and other matters that affect the land.

- 1 Lease dated 11 February 1961 of a brick wall about one foot wide and twenty six feet long between the points lettered A-B on the filed plan to Twickenham Film Studios Limited for 99 years from 29 September 1960 at the rent of 1/-.

NOTE 1: The Lease also contains grants of rights of support and ancillary rights of entry

NOTE 2: Lessee's title registered under MX423440.

Appendix R: Title Plan and Extract from Property Register for Title Number: TGL110887, Twickenham Film Studios



THIS IS A PRINT OF THE VIEW OF THE REGISTER OBTAINED FROM HM LAND REGISTRY SHOWING THE ENTRIES SUBSISTING IN THE REGISTER ON 17 DEC 2020 AT 15:46:46. BUT PLEASE NOTE THAT THIS REGISTER VIEW IS NOT ADMISSIBLE IN A COURT IN THE SAME WAY AS AN OFFICIAL COPY WITHIN THE MEANING OF S.67 LAND REGISTRATION ACT 2002. UNLIKE AN OFFICIAL COPY IT MAY NOT ENTITLE A PERSON TO BE INDEMNIFIED BY THE REGISTRAR IF HE OR SHE SUFFERS LOSS BY REASON OF A MISTAKE CONTAINED WITHIN IT. THE ENTRIES SHOWN DO NOT TAKE ACCOUNT OF ANY APPLICATIONS PENDING IN HM LAND REGISTRY. FOR SEARCH PURPOSES THE ABOVE DATE SHOULD BE USED AS THE SEARCH FROM DATE.

THIS TITLE IS DEALT WITH BY HM LAND REGISTRY, TELFORD OFFICE.

TITLE NUMBER: TGL110887

There is no application or official search pending against this title.

A: Property Register

This register describes the land and estate comprised in the title.

RICHMOND UPON THAMES

- 1 (04.03.1937) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being Twickenham Studios Ltd Twickenham Film Studios, The Barons, Twickenham (TW1 2AW).
- 2 The land edged and numbered 1, 2, 7 and 8 in blue on the title plan has the benefit of the rights granted by a Deed dated 25 September 1978 made between (1) Leo Aries Limited and (2) Brian Geoffrey Roads and (3) Twickenham Film Studios Limited.

NOTE: Original filed under MX43328.

- 3 (25.04.2013) A new title plan based on the latest revision of the Ordnance Survey Map has been prepared.
- 4 The registration of the land edged and numbered 5 in blue on the title plan takes effect subject to the exception of mines and minerals and other exceptions and reservations contained in the Conveyance dated 22 May 1958 referred to in the Charges Register.
- 5 The land edged and numbered 10 in blue on the title plan has the benefit of rights of way over the land tinted brown on the title plan.
- 6 The land edged and numbered 3 in blue on the title plan has the benefit of rights of way over the land tinted yellow on the title plan.
- 7 The land edged and numbered 3, 10 and 11 in blue on the title plan has the benefit of right of way over the land cross hatched brown on the title plan.
- 8 A Transfer of the land edged and numbered 4 in blue on the title plan dated 9 February 1960 made between (1) Brian Geoffrey Roads and (2) Twickenham Film Studios Limited contains a provision as to rights of light and air.

NOTE: Copy filed under MX404332.

- 9 The land edged and numbered 6 in blue on the title plan has the benefit of the rights granted by a Transfer of the land in this title dated 18 December 1979 made between (1) Twickenham Film Studios Limited and (2) Leo Aries Limited.

NOTE: Copy filed under SGL289814.

- 10 The Transfer dated 18 December 1979 referred to above contains a provision as to boundary structures.
- 11 The land edged and numbered 1 and 2 in blue has the benefit of the rights reserved by a Transfer of 116 St Margaret's Road dated 19 April 2010 made between (1) Twickenham Film Studios Limited and (2) Kamara Management Inc.

NOTE:-Copy filed under SGL57975.

Title number TGL110887

A: Property Register continued

- 12 (25.04.2013) The land edged and numbered 3, 4, 5, 6, 7, 8, 9, 10 and 11 in blue on the title plan has been added to the title.
- 13 (20.06.2017) A new title plan showing an amended extent based on the latest revision of the Ordnance Survey Map has been prepared.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (21.02.2020) PROPRIETOR: TWICKENHAM PROPERTIES LLP (LLP Regn. No. OC430404) of Waterside, Haal, Harmondsworth, West Drayton UB7 0GB.
- 2 (21.02.2020) The price stated to have been paid on 19 February 2020 for the land in this title and in MX423440 was £25,200,000 inclusive of VAT.
- 3 (21.02.2020) A transfer of the land in this title and other land dated 19 February 2020 made between (1) Twickenham Studios Limited and (2) Twickenham Properties LLP contains purchaser's personal covenants.

NOTE: Copy filed.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 The parts of the land tinted pink and tinted blue respectively on the title plan are subject to the covenants (so far as they run with the land and are subsisting and capable of being enforced) contained in a Conveyance thereof dated 21 March 1924 made between (1) Edith Deuet (2) Henry William Little and Herbert Ives Stileman (Vendors) and (3) Frank Charles Bates (Purchaser).

A copy of the said Covenants is set out in the Schedule of Restrictive Covenants hereto.

- 2 The part of the land edged and numbered 1 in blue on the title plan is subject to the provisions of an Agreement with the London and South Western Railway Company relating to window lights contained in a Memorandum of Agreement dated 13 May 1920.
- 3 The land cross hatched blue on the title plan is subject to a right of way.
- 4 The land hatched blue on the title plan is subject to the following rights granted by a Transfer of land on the north side of The Barons dated 11 September 1958 made between (1) Alliance Film Studios Limited and (2) South Eastern Electricity Board:-

TOGETHER with full right and liberty for the Board and its successors in title to open outwards over the land coloured brown on the said plan any entrance gate or gates and the doors or other means of access to any distribution pillar street lighting control pillar or other chamber used in connection with the transforming switching or distribution or electricity and for the time being standing on or erected along any part or parts of the land hereby transferred TOGETHER ALSO with full right and liberty for the Board to lay down construct maintain and use and from time to time to repair remove renew alter inspect examine and test cables and appliances (including ducts for carrying such cables and appliances) for the transmission of electricity under the land coloured brown on the said plan the Board making good all damage thereby caused to the reasonable satisfaction of the Vendors."