



Our ref: 18/4783
Your ref: 18/3561/FUL

Transport for London
Spatial Planning

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London Borough of Richmond upon Thames
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11th January 2019

Dear ██████████

18/3561/FUL; Land at Hospital Bridge Road, Turing House School, Twickenham, LB Richmond upon Thames – TfL's initial comments

I write following notification of this planning application on the 11th December 2018.

The following comments represent the views of Transport for London officers and are made on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority.

Location

The site is located on Metropolitan Open Land in Twickenham. It is bounded by Hospital Bridge Road to the east, residential properties fronting Redfern Avenue and the railway line to the north, Borough Cemetery to the west and Heathfield Recreation Ground, residential properties and the Bridge Farm Nursery to the south. The nearest section of the Transport for London Road Network (TLRN) is the A316 Great Chertsey Road which is approximately 800 metres south of the site.

The site is within approximately 800m of Whitton National Rail station. There is also one bus route (481) within an acceptable (640m) walking distance of the site, with stops outside the site on Hospital Bridge Road. The site has a public transport accessibility level (PTAL) of 1b on a scale of 1 to 6 where 6b is most accessible.

The school is currently open in temporary accommodation located in Teddington approximately 3.3km south east of the application site, and has a total of 325 students and 29 staff.

Vehicular Site Access

There will be no direct vehicle access from the site onto the TLRN or SRN.

Trip generation and modal split

TfL accept the proposed trip generation and modal split rates.

Car parking

The Transport Assessment (TA) states the total number of car parking spaces on site is 45. This will include 3 accessible car parking spaces, 2 enlarged car parking spaces and 40 general car parking spaces for general staff use. In addition to this 9 car parking spaces will have active Electric Vehicle Charging Points (EVCP's).

As stated at the pre-application stage, the development should accord with the draft London Plan with amendments and the MTS (2018). TfL stated previously that the car parking levels should be reduced accordingly for the school and feel that the proposed level of car parking is above the level required for operational purposes. The MTS sets out a target that by 2041 80% of journeys should be made through the use of sustainable transport modes. However given the fact a ratio of 0.5 car parking is being proposed for staff, this does not support this vision and should therefore be addressed.

The applicant fails to adhere to draft London Plan EVCP policy and this should be addressed. In order to be policy compliant, the applicant should provide 20% active and 80% passive provision.

The Car Park and Access Management plan is welcomed by TfL. However the document should reflect a site with a reduced number of car parking spaces.

Buses

TfL have been in talks with the applicant over the financial contribution for bus capacity enhancement.

The 481 bus route requires formal approval to run double deck vehicles. Whilst there are no highways restrictions that would prevent this, there is a possibility of overhanging trees along the route. TfL can only confirm that double deck vehicles can operate on this route, once testing has been completed. In the event of an obstruction that cannot practically be overcome, we would consider introducing school journeys that avoid any obstacles, whilst serving the main catchment areas along the route.

Given the low frequency of the 481 and the 146 trips forecast towards West Middlesex Hospital, double decking the existing trips would not suffice. Even for the first year of operation this would only provide an extra 27 spaces per bus. It would require two double deck school journeys from Kingston in the morning. There is only the option of running these as far as the Twickenham Tesco.

The proposed changes to the bus network in the Richmond and Twickenham area did take the proposal for the Turing House School in to account. The H22 will continue to provide a link between Twickenham and the southern end of Hospital Bridge Road. The 110 will offer new links within the Borough of Richmond thus serving a wider catchment from which we may expect to attract

some trips given the school is moving into this part of the Borough. The 110 will also be increased in frequency to 4 bph, adding capacity for 48 passengers across the busiest hour. However, we can look into running a school route along the Staines Road if we're expecting there will be sufficient demand for it. The heat map is useful for visualising where the demand for the bus network is, however TfL require a clearer view of the volume of people on each corridor and therefore request more accurate postcode data in order to provide an accurate bus contribution estimate.

In terms of any bus contribution request, it is important to reiterate that whilst there was a £15m HM Treasury grant allocated for new school bus services. This amount has now been committed to other schools and there is no more treasury funding available nor unfortunately do TfL have funding for additional school bus services. Therefore any mitigation to increase the capacity of the bus network to accommodate the school will need to come from either the school provider or the council.

It should be noted that the consultation for the formal TfL bus route changes has now finished.

Cycle Parking

It is noted that the applicant is providing 144 long stay spaces and 12 short stay spaces for pupils and staff. TfL welcome that this is draft London Plan compliant.

TfL require the applicant to demonstrate that the cycle parking is in accordance to the London Cycle Design Standards. TfL would also advise that shower and locker facilities are also provided for those members of staff wishing to cycle to work.

Pedestrian and Cyclist Access

The main access to the school is proposed from Hospital Bridge Road which forms part of a Borough road. The access at this location already exists and will serve both the school and the adjoining nursery.

The applicant is also investigating the feasibility of a secondary access point for pedestrians and cyclists from Heathfield Recreational Ground. TfL would support the provision of this secondary access route as it improves the bus accessibility of the site. It would also reduce the number of students using the Hospital Bridge Road entrance where there is the potential for conflict between students and vehicles accessing the Bridge Farm Nursery. However the applicant should demonstrate that it adhere to TfL's Healthy Streets agenda.

Pedestrian and Cyclist Safety

The TA mentions that safety will be improved for pupils travelling to school by the Borough-wide 20mph speed limit. It is noted that this is still subject to consultation. If the Borough limit does not go ahead, TfL request clarification if the Borough intend to look at the possibility of a smaller 20mph zone in the vicinity of the school?

The plans of the proposed Zebra crossing outside the School appear to show an incorrect tactile paving layout for this type of facility. The tactile next to the pavement should be two blocks deep instead of three. TfL request that this is addressed accordingly.

It is noted that the side road opposite the new school entrance has a large island splitting the entrance and exit. Whilst double yellow lines are proposed, TfL have concerns that this may become an informal pick up and drop off area by parents, as there is an ability to do a quick U-turn. Consequently, this has the potential to cause congestion around the junction and increases conflict between pedestrian and cyclist. This would be contrary to TfL's Vision Zero strategy and the applicant should detail how this will be addressed.

The collision analysis for Hospital Bridge Road roundabout concludes that collisions occurred as a result of lack of behaviour rather than lack of facilities. However consideration should be given to the fact that the collisions occurred as pedestrians and cyclists are avoiding the footbridge on the eastern arm of the roundabout due to the condition and length of this route. It would be useful to know if these conditions occurred on the eastern arm of the junction, can this be clarified from the accident data? Currently there are signalised crossings on all arms of the roundabout, with the exception of the eastern arm which is served by the pedestrian bridge. The School Travel Plan claims it would promote safe road behaviours for cyclists and pedestrians. However given the fact that this route is incredibly poor, a new signalised crossing would improve safety dramatically in the area and adhere to the TfL's Vision Zero Strategy.

Corridor analysis work that looked at Hospital Bridge Road Roundabout has been carried out and identified a scheme to reduce bus delays and incorporate a new signalised crossing on the East side of the roundabout. This would help support more sustainable trips to/ from the school, adhering to the Mayors Transport Strategy sustainable mode share targets. TfL therefore request a financial contribution of £400k towards the implementation of the scheme. The financial contribution equates to 7% of the final scheme cost and therefore TfL believes this is a justified level of contribution that will improve pedestrian safety accordingly.

Healthy Streets

The applicant has undertaken a Healthy Streets Check for Designers for the proposed development site. Whilst this is welcomed by TfL, it should be noted that the Healthy Streets Check for Designers is designed to be undertaken for proposed schemes on the highway that will cost in excess of £200,000, and should not be applied to the development site as a whole.

Planning Obligation

A Travel Plan has been provided by the applicant. However further clarification is sought over staggering school finishing times to reduce the impact on the nearby network and this should be secured by condition or the s106.

The production of the detailed Construction Logistics Management Plan (CLMP) is welcomed by TfL. However, further information of time scales of the construction programme is required. It is requested that the deliveries to the site should be restricted between 9:30am and 3pm; this takes in to consideration normal peak commuting hours and the nearby Primary School.

It is noted that the CLMP states that the majority of construction personnel will travel to and from site by their own transport due to the lack of sufficient transport options. The contractor should implement measures to encourage more sustainable methods of travel to the site and this should be monitored.

The TA also states that some large vehicles are unable to access the site in forward gear. Therefore TfL request clarification whether the access point will be widened to accommodate large vehicles, prior to work commencing.

A Delivery and Servicing Plan (DSP) has been produced. Clarification is sought that delivery and servicing times will not happen during the adjoining nearby peak nursery times. Once this is addressed, the document should be secured by condition.

Summary

In summary, TfL welcome further discussions with the applicant and London Borough of Richmond upon Thames Council on a wide range of issues including car parking provision, bus contributions and road improvement projects.

I trust this provides you with an understanding of TfL's current position on this application and we would welcome acknowledgement from you that these comments have been received and are being considered. Please do not hesitate to contact me if you have any queries. I look forward to discussing these with you and the applicant.

Yours sincerely,

George Snape

Area Planner – TfL Spatial Planning

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