



Twickenham Town Centre Area Action Plan

Pre-Publication Consultation from 16 December 2011 to 10 February 2012

QUESTIONNAIRE RESPONSE FORM

The Council is inviting comments over an eight week period on a draft of the Twickenham Town Centre Area Action Plan (AAP), following an earlier consultation on options. The results of the earlier consultation have been taken into account in this draft. The Twickenham AAP is one of a series of documents which will make up the Borough's Local Development Framework.

What is an Area Action Plan?

The Area Action Plan will be an overall strategy to guide future change and development in the town centre in the period up to 2027, making the best use of the opportunities presented by key sites to deliver high quality new buildings and public spaces and a more attractive and prosperous town centre.

The Twickenham AAP will be a statutory land use plan, covering the town centre, including the following matters:

- Use of land and buildings, including key sites
- Use of parks and civic spaces
- Transport and parking proposals and principles
- Environmental improvement schemes – large scale and principles
- Design Guidance – policies and principles

Note that we are consulting later on Twickenham Station from 27th January to 9th March 2012. This is because we will need to consider the imminent decision on the planning application on this site.

What do I need to do?

Please read the draft Area Action Plan and complete this response form to let us know your views.

All of the information, including the questionnaire, is available on our website:

www.richmond.gov.uk/twickenham_area_action_plan.htm

Please hand in, complete online or send the questionnaire to us by **10 February 2012**.

The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities to submit a response online or fill in the following response form (in 'Word' format) and return it as an e-mail attachment to Ldfconsultation@richmond.gov.uk.

Alternatively, written comment forms can be returned by post to the address below:

Planning Policy, LB Richmond upon Thames, 2nd Floor Civic Centre, 44 York Street, Twickenham, Middlesex. TW1 3BZ.

Part A – Personal Details

Personal Details		
	Personal Details *	Agent's Details (if applicable)
Title	Mr	
First Name	Nick	
Last Name	TITTLE	
Organisation (where relevant)	Richmond Cycling Campaign	
Address		
Postcode		
E-mail address (we encourage contact by email to save paper)		

*If an agent is appointed, please complete only the title, name and organisation boxes but complete the full contact details of the agent.

About You... (please tick all which apply)

- Do you live in Twickenham? Yes No
- Do you work in Twickenham? Yes No
- Do you run a business in Twickenham? Yes No
- Are you a student in Twickenham? Yes No
- Are you a visitor to Twickenham? Yes No

Part B – Your representations

Vision, Objectives and Strategy (as set out in Section 3)

1. **Vision, Objectives and Strategy:** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

Richmond Cycling Campaign [RCC] welcomes, and actively supports, the Vision's Key Theme of "Improving the public realm and reducing the impact of traffic - creating an attractive and safe place which people will enjoy visiting" [3.1.3 p14]

No-one waiting to cross the road at the junction of London Road, King Street and York Street could describe Twickenham Town Centre as "people friendly". It's a giant crossroads, more or less north, south, east and west. A senior Highways and Transport officer said, during a meeting in the first round of public consultation on the TAAP, that 2,000 vehicles pass through the town centre every hour during the morning and evening peaks and 1,600, only 20% fewer, at other times. The motor vehicle is dominant and people who walk or cycle, the most vulnerable of traffic, are low down the scale of provision. People who walk are squeezed on to narrow pavements close to busy roads whilst those who cycle fight for space on the carriageway.

It's noisy. It sounds like a race track. Vehicles accelerate away from the traffic lights at Cross Deep in the nearside lane desperate to turn right into King Street ahead of the offside lane or to avoid being held up at a red light in King Street and London Road. Air quality is poor. The Local Authority designated the Borough an Air Quality Management Area [AQMA] in 2000 because it wasn't expected to meet air quality objectives by 2005.

[See www.richmond.gov.uk/air_pollution.htm noting the statement "most of the air pollution in the Borough comes from road traffic"] The Air Quality Progress Report 2010 says "Both the modelling for 2010 and the recent monitoring results confirm that there is still a need for the London Borough of Richmond upon Thames to be designated as an AQMA." [piii]

[See daily monitoring reports at www.londonair.org.uk/LondonAir/Default.aspx and www.cleanairinlondon.org/, the Mayor's Air Quality Strategy and Low Emission Zone]

The audible [noise], visible [traffic] and invisible [air quality] characteristics prevailing in the town centre form the starting points of RCC's written response to the TAAP and is consistent with the "Scope of the Action Plan" that includes "Public realm strategy and proposals for new parks and civic spaces and other environmental improvements" and "Transport strategy and proposals for traffic management and improving the pedestrian environment" [2.2.5 p6]

We also welcome, and actively support, the underlying principle of the Spatial Strategy "Reducing the impact of through traffic on pedestrian and cycle movement and the environment and create good pedestrian connectivity between the key opportunity areas" [3.4.3 p18]

We believe there's a clear choice. Either accept the town centre is a giant crossroads, prioritise the motor vehicle and do everything possible to reduce congestion by smoothing traffic flow, in accordance with current Transport for London [TfL] policy and their interpretation of the Traffic Management Act 2004. Or, accept, as we do, the compelling need to make the town centre liveable, calm everything down by introducing a 20mph speed limit in support of dramatic changes

to the streetscape in order to begin the desperately needed transformation. In doing so we acknowledge the challenge of managing traffic on the north south route for which there's little or no alternative, in contrast to A316 for the east west route. For these reasons we look forward to seeing "the detailed traffic scheme" [4.1.3 p21]

Our response coincides with the launch of the London Cycling Campaign [LCC] "Go Dutch" manifesto for the London Assembly elections in May 2012. Quoting from a recent article in London Cyclist magazine

"One of the fundamental differences between Dutch and British practice is that there they begin by considering the needs of pedestrians and cyclists whenever they design or renew street infrastructure. As a result they make pleasant and calmed streets where possible, yet choose to provide separated facilities for cyclists where necessary on main roads."

"Another difference is that street layouts and traffic law usually give priority to cyclists over motor traffic in urban areas."

We believe the Action Plan creates an opportunity to "design or renew street infrastructure" and that there is an overlap with the Sustrans Assembly campaign promoting 20mph speed limits because:

"Where 20mph has been introduced air quality has improved, road casualties have reduced and walking and cycling levels have risen."

"Introducing 20mph to our streets and town centres across London would save lives and make London a truly liveable city."

The breadth and depth of concern about the streetscape goes well beyond people who cycle. This is clear from those within the already vulnerable pedestrian group who are additionally vulnerable through visual impairment. Their particular needs have prompted the Royal National Institute for the Blind [RNIB] to identify the key components of an inclusive, accessible streetscape, including:

- Priority for Pedestrians;
- Appropriate Traffic Speed;
- Logical Layout and Reference Points;
- Clearly Defined, Obstacle Free Pedestrian Routes;
- Pedestrian Crossings;
- Visual Contrast and Good Quality Lighting;
- Maintenance Management. [<http://www.guidedogs.org.uk/news/2010/guide-dogs-launches-design-principles-for-inclusive-streets/>]

A clear vision of how it could be, based on how it is elsewhere, is also described in the recent BBC programme "Thinking Streets" [<http://www.bbc.co.uk/programmes/b018xs8t>] while Simon Jenkins has recently written about Exhibition Road in the Evening Standard <http://www.thisislondon.co.uk/standard/article-24032482-shared-space-is-the-future-for-londons-roads.do>

Richard LEWIS, LCC, writes "In 2010, Copenhagen achieved "the world's most liveable city" status--

because it incorporates the largest area of pedestrianisation in Europe; it has fostered a cycling culture which began with investment in infrastructure to get children to cycle to school, it has removed and raised the cost of town centre and on-street car parking and it has promoted cycling much more strongly than it promotes public transport. Perhaps even more significantly, Copenhagen encourages people to live in its centre, allowing it to remain vibrant and populated all the time.

There are three key things to think about:

1. Car dependence has ruined too many of our town centres, making them unpleasant to live in, full of barriers, unsafe for families and too focused on retail rather than the multitude of functions they should be performing--because too many functions, such as town halls, have migrated out of them to where the car parks are, taking with them thousands of people who would economically support town centres;
2. The same car dependence has enabled people to vote "with their wheels" and go out-of-town. They don't enjoy the environment of out-of-town retail parks any more than they did the town centres, but in their minds the free parking and safe controlled environments are preferable.
3. Human beings love being in the company of other human beings. Making town centres less accessible by car and more accessible on foot and bike; making them into places for sitting, playing, people watching and socialising; making them beautiful; reducing road danger; and removing the "town centre as an exercise in traffic management" approach will stimulate their revival."

For retailers in Twickenham anxious about effects on trade resulting from dramatic change to the existing streetscape [especially after publication of the recent report on the high street by Mary Portas with the emphasis on the importance of free parking] it's worth re-reading the recommendations of the 2003 Sustrans Information Sheet "Traffic Restraint and Retail Vitality", that includes the statement "Retail vitality depends in large measure on an attractive environment: heavy and/or fast-moving traffic drives people away"

We also welcome and support the underlying principle of "Reconnecting the town centre with the riversides along the Thames and The Crane" and "Extension of the River Crane Walkway and the network of green spaces" [3.4.3 p18] We note use of the word "Walkway" implies pedestrian only use of what we understand to be a shared use path for "pedestrians and cyclists" [7.2.3.1 p41]

Transportation (as set out in Section 4)

2. **Transportation:** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

RCC notes "A detailed traffic scheme will be put forward for public consultation in 2012, this will have been subject to modelling and discussion with TfL" [4.1.3 p21] and we seek to influence the content of that scheme in advance of publication. To that end we welcome, and actively support, Principles for Transport "To provide safe and convenient access to and through the centre for cyclists and enhance cycle parking" [4.1.5 p22] However, we also see from Map 4.1 The Transport

Strategy [p20] that some decisions have already been made in advance of the Traffic Scheme that affect existing cycle journeys. For example, in the Northern Approach we note footway widening in London Road north from the traffic light controlled junction with Arragon Road and ask what implication this has for people who cycle away from the town centre using the existing mandatory cycle lane, albeit one with a very low level of compliance by drivers? [We also note there is no mention of the lane in the Area Specific Proposals 7.2.3 p41 on] The bus stop opposite Twickenham railway station also appears to have been moved from its current site, south of the pedestrian crossing, towards the junction with Whitton Road, north of the crossing, and ask what implication this has for the existing off-road cycle lane? Will it be replaced by a spur off the proposed River Crane shared use path to the railway station? What is proposed for people who cycle when the station is not their destination?

We expect the Traffic Scheme to acknowledge TfL's data for cycle collisions in the Borough, for the years 2006-2010, which clearly identifies clusters of collisions in Twickenham:

1. To the west, along Heath Road, between the railway bridge and King Street, including the junction with Cross Deep;
2. In the centre, along King Street, again including the junction with Cross Deep;
3. To the north, along London Road between King Street and Whitton Road.

These all fall within the specified boundaries of the Action Plan [Map 2.1 p5]

We acknowledge recorded collisions are not a problem confined to people who cycle. Information about all casualties [<http://map.itoworld.com/road-casualties-uk>] and Twickenham Town Centre in particular shows motorcyclists share the problem in Heath Road and pedestrians in King Street and London Road.

The previous RCC study of Twickenham Town Centre in April 2009 made a series of proposals to "make cycle traffic flow more easily by installing measures that may be small but have a great effect on cycle journeys i.e. 'maximum route choice with minimum diversion'." All remain worthy of consideration as part of the Action Plan and the associated Traffic Scheme. That study ends by identifying "Further Areas to Review: The London Road/York Street/King Street junction; Twickenham Station/London Road". Our written response follows this up and distinguishes between the multiplicity of cycle journeys with either Twickenham as the destination or those passing through, en route to another destination. In doing so we identify four points of entry, or gates, to the town centre which should be remodelled to achieve the necessary transformation:

1. The Northern Gate, at the junction of London Road and Whitton Road;
2. The Southern Gate, at the junction of King Street, Cross Deep and Heath Road;
3. The Eastern Gate, at the junction of York Street and Arragon Road, and
4. The Western Gate, at the junction of Heath Road and the Green.

We assume funding these works will be made from section 106 money generated by significant developments, at Twickenham Railway Station and the Sorting Office in particular, together with the transport budget of the local authority, including funding from TfL [8.0.18 p70 on]

Our response to the Area Specific Proposals [see 7. below] identifies risks in the current arrangements to people who cycle and makes recommendations about changes to the

streetscape. This is based on:

“Urban Initiatives basic predictor of road danger that can be applied to any stretch of street. Various factors could be entered and automatically updated, including:

- Lane width;
- Straightness (forward visibility);
- Frontage activity;
- Frequency of junctions

At the high end (a very straight flat road with little or no frontage activity or junctions), speeds would be very high, collisions would be few but when they happened the injuries would be serious or fatal—this was judged to be a road with high road danger. At the lower end of the scale (a shared space with limited forward visibility caused by 'punctuation'--bends, humps, people, cyclists, activity), streets have a low road danger and typically feature very few if any serious or fatal injuries. Obviously in an urban situation the latter should be the norm--we should not be designing our streets, as we do, to mimic motorway conditions, using motorway design standards applied to city streets.” Richard LEWIS, LCC

RCC welcomes the statement "The Transport Strategy maintains cycle routes on-carriageway with cyclists continuing to use the bus lanes on the approach to the town centre" [4.3.1 p23] while pointing out these lanes currently end well before the junctions with Arragon Road in both London Road and Richmond Road, and before the junction with London Road in King Street. Neither are there any comparable lanes leaving the town centre in any direction.

We also welcome the statement "[cyclists] to benefit from reduced traffic levels within London Road, King Street and York Street" and look forward to the consultation on how the Traffic Scheme intends to achieve this desirable outcome. The proposed loss of the existing bus lane east in King Street, which in any case has limited operating hours and disappears well in advance of the challenging junction with London Road, must be mitigated by significant changes to the existing streetscape and the introduction of a 20mph limit. Likewise, the proposed loss of the lane west in King Street, which, while it has significantly longer operating hours, provides no protection for people who continue to cycle west towards Heath Road and are currently exposed to the risk of collision by drivers turning left to go south in Cross Deep.

We also welcome the statement "The existing quiet route via Twickenham Embankment will be retained" and look forward to discussing how it can be accessed more conveniently than the current arrangements for people cycling east from Heath Road. Likewise, how people leaving the Riverside route at Wharf Road can access Heath Road to go west.

We also welcome the statement "All routes will be supported with appropriate levels of signage" and look forward to working in partnership with the Council to identify both existing inadequacies and future requirements.

We also welcome the statement "The widened footways will allow new cycle parking facilities to be introduced which will provide locations for more convenient access to town centre facilities" [4.3.2 p23] We assume that carriageways narrowed by widened footways will be a genuine shared space, not one where motor vehicles squeeze people who cycle off the road.

We actively oppose the Principles for Parking, in particular "New car park proposed at Station

Yard" [4.5.2 p24] which we object to in detail in 11.below "TW4 Proposal Site Station Yard". We have consistently opposed the current administration's policy on free parking given the evidence base that it promotes car usage for short journeys that could be made by other modes of transport and therefore increases congestion.

Environmental Improvements (as set out in Section 5)

3. **Environmental Improvements:** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

RCC welcomes, and actively supports, the Principles for Environmental Improvements [5.0.2 p29] including:

"Protect and enhance the River Thames and River Crane corridors and reconnect them with wider links up and down stream";

"Ensure that all new developments, environmental and transport improvements are designed to be sustainable";

"Ensure that all new development, transport proposals and environmental improvements enhance accessibility for disabled people"; and

"Ensure that new transport proposals positively enhance the street scene." [5.0.2 p29]

We note again that under "Existing and potential new open areas" the new public space along the River Crane is described as a "riverside walk" [5.0.2 p29] rather than a shared use path for "pedestrians and cyclists".

We are anxious to ensure that application of the Environmental Principle "All unnecessary/ redundant street furniture to be removed, reduced, relocated or replaced" including "signage and cycle racks" [5.0.2 p29] does not result in a net loss of cycle parking at the same time as cycling is being actively encouraged as an alternative means of transport to Twickenham Town Centre.

We welcome the Principles for Lighting including "Street lighting will be designed to create a safe and attractive environment for drivers, cyclists and pedestrians" [5.0.3 p30] and for people who choose to cycle along Twickenham Embankment we note the reference to new lighting there.

Land Use Policies (as set out in Section 6)

4. **Policy TWP 1 Policy for Retail Development in Twickenham:** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

RCC see's no intrinsic conflict between the needs of people who cycle and "Policy for Retail Development in Twickenham" [6.1 p31]. As we said in 1. above [Vision, Objectives and Strategy] we believe there is an evidence base for synergy between retail and cycling that produces a virtuous circle of mutual growth, in particular of the retail type in the Core Retail Zone and the proposal of "permanent or temporary markets" [6.1 p31]

However, we're anxious to ensure the proposed Traffic Scheme anticipates motor vehicle movement associated with, or generated by, the types of retail listed in London Road and Heath Road and puts in place measures to minimise threats, such as the risk of collision, to people who cycle to, or through, Twickenham Town Centre.

5. **Policy TWP 2: Policy for Employment in Twickenham:** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

Again, RCC see's no intrinsic conflict between the needs of people who cycle and "Policy for Employment in Twickenham" [6.2.5 p34] in particular if cycling to, and from, work in the town centre is actively promoted as a credible mode of transport, through the provision of safe routes and sufficient secure cycle parking [using London Cycle Design Guidance] to ensure congestion is not the inevitable consequence of growth .

6. **Policy TWP 3: Policy for Economic Development in Twickenham:** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

Again, RCC see's no intrinsic conflict between the needs of people who cycle and "Policy for Economic Development in Twickenham" [6.2.6 p35] again if cycling to, and from, the town centre is actively promoted in order to break the link between growth and congestion. Similarly, RCC supports the increased provision of residential use in the Action Plan Area [6.3 p35] when cycling is actively promoted, including application of planning guidance on the ratio of secure cycle parking to residential units.

Area Specific Policies (as set out in Section 7)

Northern Approach (as set out in Section 7.2)

7. **Northern Approach:** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

RCC welcomes, and actively supports, the General Principle "A comprehensive approach to development and public realm improvements is required to create a high quality entrance into the town centre. To create a well designed and welcoming entrance to the town which is a destination in its own right as well as linking well with the rest of the centre." [7.2.2.1 p38]

People cycle to Twickenham for leisure, schools, shops, work and transport. The Civic Centre and Police Station are just two examples of destinations in the town centre for significant numbers of people, as staff or visitors. The RCC Audit of cycle parking at Borough mainline railway stations in May 2010 revealed the number of people who cycle to Twickenham to get on a train, 'mixed mode' in transport jargon. Not surprising given "In 2001, 62% of all employed residents [55,500 people] commuted out of the Borough to work" and "Out-commuters...are more likely to use public transport" [Richmond Borough 2nd Local Implementation Plan for Transport] Fast trains from Twickenham to London Waterloo create a wide catchment area because they're an alternative to the stopping service from Strawberry Hill or St Margaret's, which includes people living north of the A316 and across the boundary with the London Borough of Hounslow. Whatever the casue the Audit concludes "Demand exceeds supply of cycle stands significantly." For that reason we will respond to the consultation on Twickenham Station with the recommendation that secure cycle parking provision at the station is based in the Department for Transport target of 1 in 20, or 5%, of passengers starting their journey at Twickenham. Consequently, we welcome, and actively support, the Key Transport proposal in the Northern Approach "Cycle parking at Station to be increased as part of redevelopment accessible station and improved interchange facilities" [7.2.3.1 p41]

1. Cycling to, or through Twickenham Town Centre, from the North

The existing traffic light controlled junction at London Road and Whitton Road is the northern gate to the town centre. People who cycle from the north with the railway station, or the town centre, as their destination can use London Road or the signed London Cycle Network [LCN] Route 75 through Cole Park Road that includes an off-road cycle lane at the junction. They can also use Whitton Road but there's a low level of compliance with the lead-in lane to the Advanced Stop Line as vehicles create two lanes of traffic to enter London Road towards the town centre: a manoeuvre subsequently negated by the bus lane in London Road. It should be noted there is a cluster of cycle collisions at this junction. For these reasons we recommend a thorough re-modelling of the junction, recognising it both as the northern gate and a collisions cluster. Establish the start of a 20mph zone, reduce Whitton Road to a single lane, widen the existing cycle lane and mark it through the junction to join the bus lane. For that reason we welcome, and actively support ."Improved access from London Road and necessary improvements to local highway network including London Road/ Whitton Road junction" [7.2.7.9 p46]

From the junction cyclists have protection of the bus lane to the station entrance with a high level of compliance, probably due to "7am to 7pm" and "Bus lane Cameras" signs. For that reason we welcome the apparent extension of the existing bus lane to the traffic light controlled junction at Arragon Road [Map 4.1 The Transport Strategy p20]

Leaving the station to go north in London Road is more problematic as cyclists are required to cross on foot to the northbound carriageway using a pelican crossing so we recommend replacing it with a toucan, which may be what is proposed [Map 7.2 p40]

To understand the multiplicity of cycle routes in the Northern Approach it's important to distinguish between those journeys from the east, or west, made north or south of the railway,

the line of which is, in part, the consequence of the course of the River Crane.

1a. Cycling to, or through Twickenham Town Centre, from the west, north of the railway

People who cycle can use the A316 Cycle Path or the Crane Valley Route, which currently enters Whitton Road at Court Way, or a combination of the two, using Meadway for example. For this reason we welcome, and actively support the Key Transport Proposal "Cyclists- New route alongside River Crane (pedestrians and cyclists)" [7.2.3.1 p41]

1b. Cycling to, or through Twickenham Town Centre, from the east, north of the railway

People who cycle can use the recommended cycle route on LCN75 in Cole Park Road but we note the additional opportunity created by Key Transport Proposal "new route alongside River Crane east of London Road by the station allowing a link to be made to Moorhead Park" [7.2.3.1 p41] However, we note this proposal is described as a "walk" and ask it be designated a shared use path that extends the proposal for the River Crane west of London Road, to pass under London Road. This would facilitate east-west cycle journeys where the railway station or the town centre is not the destination. Where the station is the destination the need to cross London Road can be avoided by creating a spur off the path to the station.

8. **TW1 Proposal Site Twickenham Station: *Note that we are consulting later on Twickenham Station from 27th January to 9th March 2012, this is because we will need to consider the imminent decision on the planning application on this site.***

9. **TW2 Proposal Site Heatham House:** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

RCC is anxious that any proposals for development on this site includes the requirement to actively reduce, not increase, motor vehicle traffic at what is an already challenging location.

10. **TW3 Proposal Site Former Post Office Sorting Office, open land South of River Crane and buildings to South:** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

We said in 7. above it's important to identify cycle journeys as either north or south of the railway. RCC welcomes, and actively supports, the Aim "provide links under the London Road bridge and public paths and open areas up and down stream of the River Crane, including linking with open areas further west" [7.2.7.1 p45] because this facilitates east west journeys and creates the opportunity to access the station without the need to cross London Road. For these reasons we ask for the proposal "Pedestrian link to be provided under London Road to station" [7.2.7.9 p47] to be described as a shared use path, extending the River Crane route west of London Road, which

is described as a "riverside walk/cycle route" [7.2.7.10 p47]

Like potential development of Heatham House in 9. above we're anxious any proposed development on this site includes the requirement to actively reduce, not increase, motor vehicle traffic, for example by promoting cycling through the provision of sufficient secure cycle parking for occupiers of residential housing. The location should be viewed as town centre, not suburban. For that reason the Design Guideline for Transport "On-site car parking and services to meet essential needs of residents and businesses should be carefully integrated to avoid adverse impacts on the visual or residential amenity or the effective use of the sites" [7.2.7.9 p47] should be extended to include assessment of motor vehicle entrance to, and exit from, the site.

11. **TW4 Proposal Site Station Yard:** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

RCC strongly objects to "Car park of 3 to 4 storeys from ground level to serve established needs of users of the town centre" [7.2.8.2 p49] for the following reasons:

1. It contradicts all other statements in the Action Plan, in particular:

1.1 The Vision's Key Theme of "Improving the public realm and reducing the impact of traffic - creating an attractive and safe place which people will enjoy visiting" [3.1.3 p14] by creating a destination that actively generates motor vehicle traffic;

1.2 "The proposed traffic management scheme aims to remove queued traffic from the core retail area" [4.2.2 p23] as it can only be driven to either:

from the north by turning right into Railway Approach from the southbound carriageway creating queues in London Road north, or

from the south by turning left into Railway Approach from the northbound carriageway creating queues in London Road south, or

from the east by driving straight on from Arragon Road into Railway Approach.

The current design, and carriageway width, of Railway Approach, is inadequate for this purpose.

Alternative access to the proposed car park can be made from the south by using residential roads running north south between Heath Road and Station Road, including Lion Road, Laurel Avenue, Grove Avenue, Clifden Road, Copthall Gardens and Sherland Road, or

from the west by turning left off Heath Road into Lion Road to use Station Road.

Both options are likely to generate a volume of through traffic inconsistent with the residential character of the area.

Similarly, the proposed car park can be driven away from by either:

using Railway Approach to turn left to go north in London Road. Currently there is no right turn out of Railway Approach so drivers are likely to use either the residential roads running north

south between Heath Road and Station Road, or west in Station Road.

2. Cycling from the west, south of the railway

The proposal will have a detrimental impact on the existing cycle route LCN37 which was created to provide people who cycle through Twickenham, not to Twickenham, with an alternative to the high volumes of motor vehicle traffic in Richmond Road, York Street, King Street and Heath Road. RCC's report in 2009 said "Current route along this section of Station Road is narrow and results in cyclists being intimidated by drivers, particularly at busy times." The proposed car park would significantly increase the problem and discourage use of the route. The report also said "Pedestrians appear predominantly to prefer the footpath on the south side and removal of footpath on railway side of road would allow more room for cyclists." In Station Yard "on day of permeability audit, gate was unlocked and open. Council needs to ensure that it is closed and locked." This would encourage drivers to use the narrow St Mary's Terrace to go east from the car park.

Station Yard and Railway Approach is also used by people who cycle to access the railway station via London Road north because there's no direct access on LCN 37 other than the steps in St Mary's Terrace adjacent to the London Road bridge. We recommend overcoming severance caused by the railway by a shared use bridge from Station Yard over to the River Crane shared use path.

There's also an opportunity for people to cycle straight on from Railway Approach by changing the current No Entry and Keep Left signs to include "Except Cyclists". This would enable people who cycle to go south in London Road to the town centre, left to go east in Arragon Road or access the station on a proposed shared use path the east footway.

2.1 Cycling from the east, south of the railway

Again, with no access to the station from LCN37 people who cycle to the station from the east can, like those from the west, leave the route at Station Yard to use Railway Approach and turn left into London Road using the northbound cycle lane.

12. **TW5 Proposal Site Regal House:** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

We said in 11. above that because there's no access to the station from LCN37 people who cycle to the station use Station Yard and Railway Approach. They can also leave the signed route on LCN37 at Amyand Park Road to use Arragon Road and turn right into London Road northbound, using the Advanced Stop Line and then the mandatory cycle lane. This could be avoided by creating a shared use path on the east footway, making use of the extensive forecourt on the Regal House site.

Civic and Cultural Area (as set out in Section 7.3)

13. **Civic and Cultural Area:** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

RCC welcomes, and actively supports the General Principle "creating more activities and places to go" [7.3.2.1 p52] We agree it "will attract more visitors" and if they're people who cycle then congestion is not an inevitable consequence.

While York Street and Richmond Road is not a route recommended on the TfL Local Cycling Guides it's well used by people who cycle. For that reason we welcome, and actively support, the Transport Proposal "Maintenance and provision of cycle routes through cultural quarter and cycle parking as required" [7.3.3.1 p53]

The route towards the town centre has the protection of a bus lane from Lebanon Park past the Civic Centre which, like the bus lane in London Road has a high level of compliance, but it's lost towards the junction with Arragon Road when two lanes are created to enable traffic to turn right. This junction is the eastern gate to the town and we recommend re-modelling the junction, including creation of a 20mph speed limit to support changes to the streetscape to achieve shared space. For people who continue to cycle in York Street their vulnerability establishes a pressing need to re-model the junction with London Road as part of the transformation of King Street to the junction with Cross Deep.

14. TW6 Proposal Site York House, York House Gardens, Civic Centre and Environs:

Please say whether you are - (tick as appropriate)

Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

RCC welcomes, and actively supports, the Aims and Uses [7.3.5.1 and 2 p54]

15. TW7 Proposal Site Telephone Exchange Garfield Road: Please say whether you are - (tick as appropriate)

Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

RCC welcomes, and actively supports, the Aim "green link through Garfield open space toward the station" [7.3.6.1 p55] which is consistent with a proposal in RCC's 2009 report to create a shared use path from London Road to York Road via Katherine Street and Garfield Road. As we said in 9 and 10 above we're anxious any proposed development on this site includes the requirement to actively reduce, not increase, motor vehicle traffic, for example by promoting cycling through the provision of sufficient secure cycle parking for occupiers of residential housing. Again ,the location is town centre, not suburban.

Retail Core (as set out in Section 7.4)

16. **Retail Core:** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

We welcome, and actively support, the Key Transport proposal "Active Traffic Management (ATM) to reduce dominance through traffic" [7.4.3 p57] together with the commitment to "Provision of cycle routes and cycle parking throughout"[7.4.3.4 p57] However, we note the absence of detail about what ATM is and presume it's the function of "A detailed traffic scheme" [4.1.3 p21] that we seek to influence the content of by describing relevant cycle journeys.

1. Twickenham riding from the North

For people whose destination is not Twickenham Railway Station and who continue to cycle south in London Road, rather than turning left to go east in Arragon Road, or right to go west in Railway Approach, there's little space on the carriageway between Arragon Road and York Street. There's no protection provided by way of a cycle lane, mandatory or advisory, until the advisory lane acting as a feeder to the Advanced Stop Line at the light controlled junction with York Street. There's a short section of bus lane after Arragon Road but its lost to parking bays to Katherine Street, then the kerb build out for the pelican crossing outside the police station. This constant variation in road width presents a significant risk to people who cycle. At the junction with York Street the existing layout prompts people who cycle to make the right turn into King Street wide, by going to the nearside, to allow following traffic to pass, a potentially dangerous mistake as the road is narrowed by the traffic island and railings. For these reasons we recommend transforming the streetscape along the length of London Road and at the junction with York Street and King Street, to create shared space supported by the 20mph speed limit established at the four points of entry to the town centre.

2. Twickenham riding from the South

For people cycling away from the town centre in London Road there's a mandatory cycle lane that starts after the junction with Railway Approach and runs to the bus stop before the pelican opposite the station. However, unlike the bus lane on the opposite side of the road, it has low level of compliance with the lane despite the various markings. This is commonly the result of a driver who comes over the brow of the bridge and now has a clear view of the junction with Whitton Road, unless a bus is stopped, sees the nearside lane and undertakes the line of traffic, prompting following vehicles to do the same. We recommend strict enforcement of the lane with consideration of cameras and engineering solutions.

The lane is indicated, but not marked, riding away from Arragon Road because there are two lanes at this junction to allow vehicles to turn right. There's an Advanced Stop Line at the junction with an advisory cycle lane as an intended lead-in but it's too narrow to be used safely. This lane begins after the bus stop just past the pedestrian crossing outside the police station where the carriageway has been narrowed to reduce the distance to cross. The problem of available space in London Road is a problem that begins back down the road in King Street on the approach to the junction with London Road and York Street, where there are two lanes for north and east bound traffic respectively. Actually, it's a problem that begins further back down the road, at the junction of King Street and Cross Deep, the southern gate to the town centre. We said at the beginning we recognise the challenge of managing traffic on the north south route because there's little or no alternative. And this is as true for people who cycle. Consequently LCN75, a route from Kingston

to Ealing, runs in Richmond Borough from Hampton Wick to the A316 through Twickenham Town Centre using the busy and space limited Cross Deep, King Street and London Road. And because there's little alternative for people cycling on the north south route and because they're more vulnerable than people who drive and because you can't make more space between buildings on each side of the road at the junction of King Street, London Road and York Street without knocking something down, and nobody is proposing that, the junction has to be re-modelled, transformed to achieve a genuine shared space, not one given over to motor vehicles with people who walk as spectators and people who cycle as unequal opponents.

The existing protection given by the bus lanes to people who cycle in King Street is undermined both by their limited hours of operation, in particular east bound, and by their abrupt disappearance on the approach to the junctions with London Road and Cross Deep respectively. For those reasons we don't object to the proposal "King Street - Remove the eastbound and westbound bus lanes to reduce road width with inset bus stops and shorter pedestrian crossings" [7.4.3.3 p57] providing there's a radical transformation of the streetscape to create genuine shared space without varying carriageway width and supported by a 20mph speed limit in order to re-balance the relationship between different traffic types, including pedestrians.

We're also anxious that the proposal "King Street/Cross Deep/Heath Road - Relocation of some or all bus stops from King Street to Cross Deep and Heath Road" should not have a detrimental impact on people who cycle west in Heath Road [see 20. below]

17. **TW8 Proposal Site Police Station London Road:** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

RCC is neutral on this proposal but highlights the pelican crossing outside the police station as the clearest example of varying carriageway width along London Road, something that is generally a threat to the safety of people who cycle and should be eliminated as part of the proposed Traffic Scheme.

As we said in 9, 10 and 12 above we're anxious that any proposed development of this site includes the requirement to actively reduce, not increase, motor vehicle traffic on London Road.

Twickenham Riverside and Approaches (as set out in Section 7.5)

18. **Twickenham Riverside and Approaches:** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

RCC welcomes, and actively supports, the principle "To improve the pedestrian environment and reduce dominance of parked and moving traffic" [7.5.2.3 p60] but are anxious this includes acknowledgement of, and has no detrimental impact on, the value of the existing cycle route. For

this reason we welcome the Key Proposal "Retention of the existing cycle route" [7.5.3.1 p62]]

The route provides an alternative to the challenges of both the existing town centre layout, and the route between Richmond and Twickenham, by following the Thames along Riverside, Embankment [which floods periodically] and Wharf Road to the junction with King Street either to cycle away from Twickenham south in Cross Deep or to continue west in Heath Road. We welcome the opportunity to discuss improvements at these junctions as part of the detailed Traffic Scheme.

However, we note reference to "pedestrian priority" in 7.5.2.3 [p60] and "shared surface / pedestrian priority" in Map 7.14 [p61] so ask that changes made clearly indicate shared use in order to minimise the risk of conflict between people who cycle and people who walk.

19. **TW9 Proposal Site Twickenham Riverside (Former Pool Site):** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

We note the Design Guidelines stated in 7.5.5.6 [p65] and, in addition to the need to clearly establish shared use referred to in 18 above, we ask that considerate cycling is the stated default position of the local authority when establishing routes through the new open spaces rather than extension of existing byelaws to prohibit cycling.

Heath Road Western Approach (as set out in Section 7.6)

20. **Heath Road Western Approach :** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

We note the statement "Retain existing cycle provision" [7.6.3.1 p67] but repeat our previous concern about the significant cluster of cycle collisions in particular, and collisions in general, on this route [see above Section 4 "Transportation"] There is no recognition in section 7.6.3 "Transport Proposals in Heath Road Western Approach" of this problem, or proposals to solve it, and for this reason we've taken a more detailed approach here.

1. Cycling Away from Twickenham Town Centre

For people cycling west in Heath Road there is no bus lane and little space between the parked cars and the lane of moving traffic, which is restricted from moving further out by a raised carriageway dividing kerb. Threats to cyclists on this route come from:

1. Driver's door of parked vehicle opening;
2. Vehicles moving right out of the parking bays into the carriageway;
3. Vehicles moving left across the carriageway into a parking bay;

4. Traffic travelling west in Heath Road turning left across the carriageway to enter one of the four left hand junctions [Heath Gardens, Saville Road, Radnor Road and Tennyson Avenue]

5. Traffic crossing the lane by exiting from one of four junctions and either turning left to travel west or right to travel east in Heath Road;

6. Traffic crossing the carriageway from the on-coming, eastbound, carriageway of Heath Road to enter one of the four junctions on the south side;

7. Traffic crossing the lane to enter one of the four junctions on the south side from of the four junctions on the north side [Lion Road, Laurel Avenue, Grove Avenue and Clifden Road]

We recommend transforming the streetscape to created shared use supported by 20 mph speed limit to Twickenham Green, including removal of the central carriageway dividing kerb, with particular attention given to minimising the risk of collision at the identified junctions. Some change to the existing layout will be required for "Potential relocation of bus stop from King Street to east end of Heath Road close to the junction with King Street" [7.6.3.1 p67]

2. Cycling Towards Twickenham Town Centre

For people cycling into Twickenham from the west along Heath Road, particularly those who do not use LCN37 because they will cycle south in Cross Deep, do have protection from a bus lane up to the junction with Cross Deep. Unlike the mandatory cycle lane in London Road described earlier, but like the bus lane there is a high level of compliance with the lane, probably due to "At any time" and "Bus lane Cameras" signs. Threats to cyclists in the bus lane come from:

1. traffic travelling east in Heath Road turning left across the lane to enter one of the six left hand junctions between the railway bridge and Cross Deep [Lion Road, Laurel Avenue, Grove Avenue, Clifden Road, Cophall Gardens and Sherland Road];

2. traffic crossing the lane when exiting from one of these six junctions and either turning left to travel east or right to travel west in Heath Road;

3. traffic crossing the lane to enter one of the six junctions from the on-coming, westbound, carriageway of Heath Road;

4. traffic crossing the lane to enter one of the four junctions on the north side of Heath Road [Lion Road, Laurel Avenue, Grove Avenue and Clifden Road] from one of the four junctions on the south side [Heath Gardens, Saville Road, Radnor Road and Tennyson Avenue]

We note motorcycles have been permitted to use bus lanes since 23rd January. According to LCC during the trial periods prior to the change there was a significant increase in the number of collisions between cyclists and motorcyclists, from 10 in the first trial to 25 in the second. There was also a significant rise in the number of motorcyclists killed in fatal collisions while riding in bus lanes, from 1 in the first trial, to 7 in the second.

We recommend changes to the carriageway to minimise the risk of collision at the identified locations supported by a 20mph speed limit from the start of Heath Road.

21. **Costings, Implementation and Monitoring:** Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.

RCC welcomes, and actively supports, the statement "it will be important to ensure that transport and environmental improvements form an integral part of any future development proposals to ensure that the improvements identified in the AAP can be delivered." [8.0.10 p68]

We also welcome the statement "The Council is committed to working in partnership" [8.0.4 p68] and ask to be recognised as a "voluntary sector organisation" [8.0.14 p69]

We ask that the wealth of experience and knowledge of other places identified in our written response to 1. above [Vision, Objectives and Strategy] be used when "Carrying out design and modelling work to re-balance how the public realm is used for traffic and pedestrians" [8.0.27 p71]

Any other comments on draft Area Action Plan or supporting documents (see www.richmond.gov.uk/twickenham_area_action_plan.htm)

22. Please specify document name _____
and/or **paragraph number(s)** _____
23. Please say whether you are - (tick as appropriate)
Supporting it Objecting to it

Please give details of your objection or supporting comment (with reasons for it) below, and indicate other wording you think the Council should consider.



Thank you for taking the time to complete this questionnaire. We will keep you informed of progress on the Area Action Plan. See Council webpages for further information www.richmond.gov.uk/twickenham_area_action_plan.htm