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Date: 12th September 24

Phil Cresswell
Executive Director, Regeneration, Housing and Environmental Services

Dear Transport for London,

Re: Hogarth Roundabout Proposed Safety Improvements Consultation

Thank you for the opportunity to respond to the consultation on proposed road safety improvements to Hogarth Roundabout, Chiswick. I would also like to thank you for attending the site meeting with local community representatives including Councillors and the local MP.

Hogarth Roundabout is a strategic junction on the Transport for London Road Network where the A4 meets the A316. These roads are key arterial links serving London from the west and south-west and as such provide for long-distance journeys. However, they also allow shorter local journeys within this and adjoining boroughs, and there are links from the roundabout towards Chiswick High Road to the north and Old Chiswick to the south from Church Street. As such it plays an important role in how our businesses and communities travel within the area.

As a borough we are committed to Vision Zero improving safety on London's road network so that no-one is seriously injured or killed by 2041. Given the collision history at the roundabout, which is one of the 10% most dangerous junctions in London, we welcome the aim to reduce the likelihood of collisions at Hogarth Roundabout.

The Council has been following this consultation and listening to feedback and concerns raised by local residents, businesses, Councillors and the local MP. We have also engaged with TfL to raise technical questions regarding the data used to evidence the need for the improvements and also the impact of the proposed designs.

We wish to provide the following formal response to the consultation:

Scheme Ambition

- Whilst the proposals have been designed based on collision data we believe the scheme should be more ambitious and introduce at-grade crossings for pedestrians and cyclists. This would be in accordance with TfL's own Healthy Streets design guidance which seeks to prioritise walking, cycling and public transport. Hogarth Roundabout, the A4 and A316 are significant barriers which sever local communities and local trips between the River Thames and Chiswick High Road. This severance between communities reduces access to key local services. The Healthy Streets Design Guidance promotes the introduction of at-grade crossings to reduce severance.
- There are a series of subways beneath the roundabout which allow pedestrian and cycle movements across the junction. However, these are poorly signed and personal safety is a concern for people when using subways. It is also noted that elsewhere TfL promotes their removal and replacement with at-grade crossings. The proposals include a deep clean of the subways but this should be undertaken regardless as part of TfL own maintenance schedule. Work to the subways also needs to include improvements to wayfinding and visibility.
- We request that TfL set out how this proposal fits into ambitions for the roundabout to be more pedestrian friendly, with the introduction of at-grade pedestrian crossings and improvements to pedestrian and cycle accessibility. It is essential that the current proposal does not prevent further improvements from being delivered.

Changes to traffic circulation on the roundabout

- The current proposal seeks to relocate the merging of the two southbound lanes on Burlington Lane Southbound onto the roundabout itself. This causes concern and we request the following information:
- Please confirm that this is the proposed arrangement and that it has been subject to a Road Safety Audit (RSA). Thanks you for providing a copy of the Road Safety Audit. This was only received on the 11th September, however, and we have not been able to review in detail. Therefore, we may have follow-up questions on this beyond the end of the consultation period. This is an essential piece of the evidence base and we therefore hope TfL will continue this dialogue.
- Please can vehicles flows at the roundabout be provided, including details of turning movements.
- Any change in the lane arrangement has the potential to alter the operation of the junction and as such would normally require modelling to be undertaken. We understand that no modelling has been undertaken to date and therefore request the evidence base for ensuring these changes do not impact on traffic flow on or approaching the roundabout. We also request improved road markings and signage is provided.

Proposed dedicated left-turn lane on the westbound A4 approach

- It is proposed to increase the lane width on the westbound A4 approach to the roundabout to provide a dedicated left-turn lane from the A4 onto the A316. There are a number of different impacts that result from this part of the proposal.

Parking impact

- This will result in the removal of parking from Mawson Lane. This road is currently not located in a CPZ and as a result could see an increase in parking demand in adjacent CPZs. The adjacent CPZ Chiswick Mall already has limited capacity, and it is unlikely to be able to accommodate these vehicles.
- It is understood that much of this parking is for shift workers at the Brewery, what engagement and support has been undertaken with the Brewery to understand their requirements?
- Please can parking surveys be undertaken and the results shared.
- Improvements to active travel infrastructure and links to public transport may provide more opportunities for employees to travel by other means and this needs to be considered as a consequence of this proposal and included.

Air Quality

- Concerns have been raised with the Council about air quality at the roundabout. It is acknowledged that providing a dedicated left turn lane may manage traffic flow better on this approach and therefore improve air quality but no information has been provided in this respect. Please can any information regarding the benefits to air quality be provided.

Road Safety

- The impact of this proposal on road safety needs further investigation. It is not clear that this is a direct response to the collision data and may in itself lead to other road safety concerns. It is essential that the impact of the left turn lane is fully investigated and subjected to Road Safety Audit to ensure there are no unintended consequences.
- It should be confirmed that changes to advance speed limit reduction, and advance road markings and signage will be included in the scheme. Would these on their own provide the road safety improvements that are needed? Please confirm that this has been assessed.

Church Street entry/exit closure

- The proposal to provide a dedicated left turn lane results in the closure of the existing access to Church Street from the roundabout. This is a significant concern given that access to Old Chiswick is restricted by the A4 and A316 and closure of this junction may lead to increased severance for the local community. It must also be noted that

access is further restricted at high tide when Chiswick Mall is flooded and this is the only point of access to Church Street. Retaining easy access to this area from Church Street is therefore essential to the local community.

- Whilst access to the brewery is primarily from the A4, there are others that require access including St Nicholas's church who require access to be maintained for funerals and other events, and the George & Devonshire pub which requires service vehicle access. These businesses do have people visiting by coach which needs to be considered.
- The proposal is for access to be taken from Burlington Lane, adjacent to Chiswick Square. However, this requires a sharp turn in from the A316, close to the roundabout exit. We raise concern that with the introduction of the dedicated left-turn lane vehicles are likely to be travelling quickly and may mistake a left turn signal by those wishing to turn right towards Church Street for an intention to travel onto the A316 from the roundabout. This could lead to an increase in rear shunts and would undermine the intention of the overall scheme.
- The swept path drawings that have been provided to us indicate that larger vehicles would have trouble turning right towards Church Street. Only a large van would be able to turn easily into Burlington Lane from the A316. We also note that whilst the left turn movement into Burlington Lane can be technically accommodated by some vehicles, given the angles, this may not be possible i.e. if vehicles are not properly aligned this could result in vehicles having to reverse onto Burlington Lane to make the manoeuvre. In particular, pantechnicons would have to reverse from the A316. It has not been demonstrated that other vehicles such as hearses or emergency services vehicles would be able to access the area. In all scenarios this would require the loss of at least one parking bay on Burlington Lane.
- Our examination of the supplied swept path drawings noted that the edge of the carriageway is closer to structural elements of this junction. In particular, the bridge pier on the Burlington Lane arm, but also the free edges of the subways that are more susceptible to increased loading. It is acknowledged that the design may not be advanced enough yet to carry out a detailed loading analysis but has a risk assessment been carried out for the bridge pier?
- Vehicles exiting from Burlington Lane and wishing to travel on the A4 or into Chiswick would have to perform a U-turn on the A316 just beyond the entrance to the flyover. Concern is raised regarding the safety of this manoeuvre for all vehicles, and that swept path analysis and Road Safety Audit have been undertaken.
- A copy of the Road Safety Audit that supports the changes has been provided but we have not yet had time to review it as stated above. Whilst there is currently a risk of collisions involving vehicles entering or exiting Church Street we understand that this is not the main focus of the proposed improvements, and moving the access to the A316 could increase the risk of collisions.
- Given the access requirements for the local community and businesses it would therefore appear necessary for the access from Hogarth Roundabout to Church Street to remain open. It has not been made clear what options were reviewed when

drawing up the current proposal. For example, the access to Church Street is not required to be closed to facilitate the left-turn lane from the A4. Please can the optioneering work undertaken to get to the consultation design be shared.

- It was noted at the site meeting on the 6th September that a number of pedestrians and cyclists crossed Church Street to and from the subway. Has an option that retains access to the roundabout and improves crossing facilities at this location been considered? If not, we would urge that this is tested as an alternative to closure.
- Whilst we acknowledge that reducing traffic movements to and from a roundabout can have road safety benefits we do not believe this has been demonstrated in this case and that a change to the proposal is required for the Church Street junction to remain open. In particular, we need to be clear that closing the Church Street junction will not lead to unintended road safety consequences in other locations.

Active Travel Infrastructure

- The addition of Advance Stop Lines for cyclists on carriageway approaches to junctions are generally welcomed. However, it is questioned whether this is appropriate in this case the nature of the roads is not likely to lead to significant use by cyclists. If they are to be provided, concern is raised that there are no cycle lane approaches for cyclists to pass standing vehicles to access the ASLs. The ASLs should be delivered with clear entry/egress point from the adjoining shared footway to allow cyclists to move from the carriageway to the off-carriageway provision.
- Footway improvements and dropped kerbs should be introduced to provide better access to the subway on Burlington Lane. The current plans only show widening of the footway which is welcomed however dropped kerbs need to be included to ensure the subway is fully accessible. Comment has been made above in relation to crossing movements on Church Street which need to be addressed.

Further considerations

- Should the proposals proceed with the closure of the Church Street junction, the impact could result in greater usage of the right-turn movement from the A4 eastbound onto Netheravon Road South. This is currently un-controlled across three-lanes of oncoming traffic. What data does TfL hold in relation to the existing number of movements at this junction and what forecast has been made to understand if the current proposals would result in increased usage. If there is likely to be increased usage, has this been assessed and are there any safety implications of this?
- We note the proposed speed limit reduction from 40mph to 30mph as part of the proposals. What data is held for existing speeds at the junction and its approaches?
- Throughout this consultation and engagement exercise a forward programme of next steps has not been detailed, including future plans for the roundabout, it would be useful if this could be shared for all stakeholders involved. We are aware that the

flyover is coming to the end of its life and we would like to understand how TfL is planning for this and the impact if it is not able to be used by vehicular traffic.

We look forward to your response to the matters raised and working with Transport for London to bring forward proposals which jointly improve road safety and still serve local communities.

Yours sincerely,

A handwritten signature in grey ink that reads "K. Dunne". The signature is written in a cursive, flowing style.

Cllr Katherine Dunne
Cabinet Member for Climate, Environment and Transport.