
CHAPTER 2

STRATEGY

Policy/Para **03.02 (f)**

Modification ref: **D/STRAT/03**

Issue

The modification is pedantic and unnecessary.

Inspector's appraisal and conclusion

2.1. In my view the modification suggests a minimal contribution of new housing. Though still approximate I consider it a more realistic approach in the light of the Borough's housing target.

RECOMMENDATION

2.2 I recommend that the UDP be modified by D/STRAT/03.

Policy/Para **STG 02**
Environment

The

Modification ref: **X/STG02/02**

Issue

The criteria supporting the protection of residential amenity should not prevent the sensitive intensification of residential areas needed to deliver the vision of a compact city, the need to make more efficient use of land, and to accommodate growth in a sensitive way.

Inspector's appraisal and conclusion

2.3. I consider the objector's concerns are adequately dealt with in such strategic policies as STG3 and STG6.

RECOMMENDATION

2.4. I recommend that the UDP be modified by X/STG02/02.

Modification ref: **D/STG02/05**

Issue

The deletion of 'sustainability' is contrary to national policy and raises the question of what criteria will replace it.

Final Version

Inspector's appraisal and conclusion

2.5. The national objectives of a sustainable strategy are set out in paragraph 2.2 of the UDP in a way that should infuse the UDP as a whole. I consider paragraph 3.8 is sufficiently explicit about one of the Council's distinctive duties in the town planning field and I am not convinced that it requires additional emphasis by repetition of the sustainability objective.

RECOMMENDATION

2.6. I recommend that the UDP be modified by D/STG02/05.

Modification ref: D/STG02/07

Issues

- (i) As many successful backland developments have taken place in the Borough the modification should be deleted.
- (ii) The change makes the Policy too rigid to the extent that it could restrict opportunities to provide affordable housing.
- (iii) The Policy lacks definition of 'inappropriate' and fails to support the UDP's commitment to sustainable development.

Inspector's appraisal and conclusion

Backland development

2.7. It does not appear to me that the modification imposes an embargo on backland and infill development. It merely requires that when seeking to promote the use of small sites regard should be paid to the living conditions of existing neighbouring residents.

Opportunity to provide affordable housing and definition of 'appropriate'.

2.8. I find the objector's fears misplaced. The Policy does not prejudice flexibility or the efficient use of land resources. While the proposed new Part 2 policy on backland and infill development would set out the criteria for the approval of such development, which could include affordable housing, I am satisfied for the reasons I state in Chapter 7 of this Report that the concerns expressed by the objector are addressed in other policies of the UDP and that consequently that additional policy is not necessary.

RECOMMENDATION

2.9. I recommend that the UDP be modified by D/STG02/07.

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| Policy/Para | STG 03 | Conservation of resources and pollution |
| Modification ref: | D/STG03/02 | |
| Modification ref: | D/STG03/04 | |
| Further modification ref: | D/STG03/09 | |

Inspector's notes

Although it is not the subject of any objection the title of this policy is curiously ambiguous. While it does not fall to me to make a formal recommendation I suggest for the reason I state below that consideration be given to its renaming as 'Conservation of resources and control of pollution'.

The original modifications D/STG03/02 and D/STG03/04 are taken together here as the further modification D/STG03/09 refers to both of them.

Issues

- (i) The modification is not strong enough: the Plan should explicitly reflect the importance of discouraging car use.
- (ii) '...seek to reduce the use of the private car' should not be deleted from bullet point 12.
- (iii) The deletion of 'limiting car parking' and 'reduce the use of the private car' is a retrograde step. They should be important elements of the UDP strategy which should reflect the Mayor's Transport Strategy and the draft London Plan. Bullet point 8 should read 'Promote energy efficient forms of transport through limiting car parking and providing improved facilities for walking, cycling, and public transport'. Bullet point 12 should read 'Seek to reduce car dependency by increasing travel choice and encourage more energy-efficient and low pollution forms of transport'.
- (iv) '....and car parking provision for new developments' should be added to avoid the creation of new car parks and to comply with national policy.
- (v) D/STG03/09 only goes part of the way to meet a previous objection.
- (vi) Parking standards should be amended to state what the requirements are for specific units rather than hiding behind 'minimum' and 'maximum'.
- (vii) The Policy should identify what are regarded as appropriate locations for limiting car parking.

Inspector's appraisal and conclusion

Limiting car parking and reducing private car use .

2.10. The LPA claims that its priority is to progressively enable all travellers to have a choice of a full range of viable alternative modes of transport, save when personal disability or an unalterable job requirement necessitates car use, to reduce dependence on the car. I consider the amendment of bullet point 8 of the explanatory text by D/STG03/09 effectively discourages car use. While a choice of alternative modes of movement may not be instantly available I consider the amendment of bullet point 12 by D/STG03/09 appropriately expresses the goal of reducing dependency on the car.

2.11. I do not, however, support the inclusion of reference to energy consumption by vehicles in the modification of bullet points 8 and 12. Control of pollution generated by vehicles is not a matter germane to planning control, which extends only to consideration of the traffic generating capacity of development. I consider that to imply planning control extends further is misleading.

Appropriate locations and the extent of provision for parking.

2.12. I consider the further modification of D/STG06/01 by D/STG06/03 and that of D/STG11/02 by D/STG/11/09 respond to this issue in satisfactorily clarifying terms and that no modification of Policy STG3 itself is required in respect of these matters.

RECOMMENDATION

2.13. I recommend that the UDP be modified by D/STG03/02 and D/STG03/04 as further modified by D/STG03/09, save that bullet point 8 read 'Providing improved facilities.....commuter car parking' and that in bullet point 12 'and low pollution' be deleted.

Modification ref: D/STG03/03

Issue

The Plan has changed emphasis from discouraging car use to promoting a choice of means of travel.

Inspector's appraisal and conclusion

2.14. The LPA claims that its priority is to progressively enable all travellers to have a choice of a full range of viable alternative modes of transport, save when personal disability or an unalterable job requirement necessitates car use, to reduce dependence on the car. While a choice of modes may not be instantly available I consider the land use policies of the Plan conduce to the discouragement of car use.

RECOMMENDATION

2.15. I recommend that the UDP be modified by D/STG03/03.

Policy/Para

STG 06

Housing

Modification ref:

D/STG06/01

Further Modification ref: D/STG06/03

Inspector's note

D/STG06/03 meets the GLA's objection to D/STG06/01 by appropriately adding '...and areas within walking distance of town centres or otherwise well served by public transport, subject to compatibility with established character' to paragraphs 3.18 and 8.52.

Issues

- (i) The 40% affordable housing requirement is excessive and fails to recognize particular costs.
- (ii) Exceeding the housing target would threaten the intention to achieve a balance between housing needs and preserving the character and quality of the area.
- (iii) The rewording of para 8.52 (and hence of para 3.18) restricts the encouragement of higher densities in town centres.
- (iv) Reference to car free and reduced parking provision should be restored.
- (v) It is not necessary to refer to 'compatibility with the established character' in para 3.18 as this is implicit in national policy guidance.

Inspector's appraisal and conclusion

The requirement of 40% affordable housing.

2.16. This proportion was recommended in the Inspector's Report on the first UDP Review Inquiry. It is identical with a proposal which has been endorsed in the panel report on the draft London Plan. However, I explain with regard to Policy HSG6 that for reasons of particular importance in Richmond I consider the figure should be raised to 50%.

Exceeding the housing target would threaten the intention to achieve a balance between housing needs and preserving the character and quality of the area.

2.17. This matter was considered in the first UDP Review Inquiry. The modification follows the Inspector's recommendation and I am not aware of any convincing evidence to justify altering it.

The rewording of para 8.52 (and hence of para 3.18) restricts the encouragement of higher densities in town centres.

2.18. I consider the objection by the Government Office for London is met by D/STG06/03, which I support.

The restoration of reference to car-free or reduced car parking provision.

2.19. Such development is not precluded by the modification and is specifically allowed for in Policy TRN4. It is not necessary to refer to 'compatibility with the established character' in para 3.18 as this is implicit in national policy guidance.

2.20. The purpose of the modification is to reflect the tension in achieving higher density in established residential localities. I consider it is correct in taking account of both elements.

RECOMMENDATION

2.21. I recommend that the UDP be modified by D/STG06/01 as further modified by D/STG06/03, save that '40%' be replaced by '50%'.

Modification ref: D/STG06/02

Issue

The modification will prevent residential development coming forward. Living amenities are already protected by other policies.

Inspector's appraisal and conclusion

2.22. While the modification relies on a perceptive analysis of existing residential environments it does not in my view inherently inhibit further residential development and serves a useful purpose in ensuring consistency in the UDP.

RECOMMENDATION

Final Version

Issues

- (i) D/STG11/02 will cause additional problems in Richmond town centre. Greater flexibility than bullet point 8 of paragraph 3.29 is needed, such as increasing parking spaces and allowing residents on-street parking when they have no alternative.
- (ii) Commuter parking is not the only motivation for controlling parking.
- (iii) D/STG11/02 reduces the emphasis on restricting the use of cars; paragraph 3.29 should remain unchanged.
- (iv) Contrary to exhorting public transport operators to introduce cleaner exhaust systems that should be a requirement for all vehicles. (D/STG11/10).
- (v) D/STG11/09 is contrary to national guidance in PPG3 and PPG13. The previous version of paragraph 3.29 should be restored.

Inspector's appraisal and conclusions

Parking in Richmond town centre.

2.28. I consider D/STG11/09 establishes a reasonable balance between parking demand, efficient bus operations, traffic flows, the servicing of premises, and road safety. As this is a general strategic policy it would be inappropriate to prescribe more favourable treatment of parking for a particular area of the Borough nor, in the light of national policy, is it fitting to refer in general terms to increasing provision for parking. Nevertheless the possibility always remains open of responding to exceptional conditions in any particular location.

Commuter parking is not the only motivation for controlling parking.

2.29. The LPS acknowledges that the management of parking may clearly be appropriate for reasons other than problems generated by commuter parking. I consider that is satisfactorily recognised in the modification of D/STG11/02 by D/STG11/09.

Reduction of the emphasis on restricting the use of cars.

2.30. In my view the modification of D/STG11/02 by D/STG11/09 introduces a more precise description of the aims of restricting parking and hence of private car use, particularly in its reaching out to situations other than commuter parking.

Vehicle exhaust systems.

2.31. Exhaust systems are not subject to control under town planning legislation. Rather than extending the scope of that reference I consider it irrelevant to the UDP and should be deleted.

The relation of the modification to national guidance.

Final Version

2.32. It is claimed that, contrary to the national advice in PPG3 and PPG13, D/STG11/02 could allow an increase in parking compared with the original text. However, in my view that is not a sustainable interpretation of the further modification which usefully particularises the application of parking standards and management.

RECOMMENDATION

2.33. I recommend that the UDP be modified by D/STG11/02 as further modified by D/STG11/09, subject to the deletion of the reference to the exhaust emissions of public service vehicles. (D/STG11/10).

Modification ref: D/STG11/08

Issue

The change will encourage car use.

Inspector's appraisal and conclusion

2.34. Contrary to the objector's prognostication the change recognises that new and improved public transport facilities rather than major road building are appropriate in South West London. In that context I consider D/STG11/08 pertinent and note that the Part 2 Transport policies are consistent with it.

RECOMMENDATION

2.35. I recommend that the UDP be modified by D/STG11/08.

Policy/Para STG 14
Monitoring and review

Modification ref: D/STG14/06

Issue

The objectives of a 10% reduction in car travel and no net increase in private non-residential parking should not be deleted. Congestion exacerbates pollution and wastes time; charging schemes should be considered and the number of bus lanes increased.

Inspector's appraisal and conclusion

2.36. The question of setting a target for road traffic reduction lies outside the Council's control. The volume of traffic in the Borough is dependent on the expectation of the London Plan that there will be some growth in traffic in Outer London. In the circumstances I consider it would be misleading to imply that the council has a greater measure of control than is the case and the modification should therefore stand. Such matters as charging schemes and bus lanes are in my view appropriate to the Borough's Local Implementation Plan for transport and not the UDP.

RECOMMENDATION

2.37. I recommend that the UDP be modified by D/STG14/06.

Modification ref: D/STG14/08

Issue

Travel should not be deleted from the performance targets.

Inspector's appraisal and conclusion

2.38. This matter is outside the Council's control. The volume of traffic in the Borough is dependent on the expectation of the London Plan that there will be some growth in traffic in Outer London. In the circumstances I consider it would be misleading to imply that the council has a greater measure of control than is the case and the modification should therefore stand.

RECOMMENDATION

2.39. I recommend that the UDP be modified by D/STG14/08.