

## CHAPTER 6

## TRANSPORT

**Policy/Para**                      **07.002**  
**Modification ref:**              **D/TRAN/07**

**Issue**

There is no published justification for the statement that the level of through traffic in Twickenham has been controlled by the use of sophisticated traffic signals.

**Inspector's appraisal and conclusion**

6.1. The objector claims that in the absence of justification this statement should be deleted. However, because the traffic controls afford flexibility in response to traffic volumes I consider it incorrect to interpret 'level' as a fixed quantum. The statement is a factual one describing an ongoing situation and I find no justification to change it. In my view to describe it as 'sophisticated' obscures rather than clarifies its nature. The installed signalling is clearly programmable, which allows for variation in response to identified traffic conditions. While I shall recommend alternative wording I bear in mind that this is a detailed traffic management matter rather than a concern relevant to the UDP. Reference is also made to the failure to publish results of the operation but that is a matter for the Council as Highway Authority and is outside the scope of the UDP.

**RECOMMENDATION**

**6.2. I recommend that the UDP be modified by D/TRAN/07, subject to the deletion of 'sophisticated' and its replacement by 'programmable'.**

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**Policy/Para**                      **07.003**  
**Modification ref:**              **D/TRAN/10**

**Issue**

The change understates the need to improve pedestrian and cycle facilities.

**Inspector's appraisal and conclusion**

6.3. I consider that far from altering the thrust of the Policy, the change reaffirms a priority commitment to improve conditions for pedestrians and cyclists. While the objector instances the 'walking bus' experiment at St Margaret's I note that the change goes further in unreservedly supporting the *Safe Routes to Schools* project.

**RECOMMENDATION**

**6.4. I recommend that the UDP be modified by D/TRAN/10.**

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6.9. Because some commuting is entirely within the Borough the objector considers 'immediate' should be inserted before 'area'. In my view neither the UDP modification nor the objector's suggested amendment adequately describes the physical situation. As it is not clear whether 'area' is coincident with the Borough it seems to me that in the circumstances a clear general discouragement to car commuting, being less discriminatory, is preferable and the disputed text should be deleted.

**RECOMMENDATION**

**6.10. I recommend that the UDP be modified by D/TRAN/13, subject to the deletion of 'from outside the area'.**

**Policy/Para 07.011**  
**Modification ref: D/TRAN/19**

**Issue**

The deletion of reference to the disabled is contrary to national policy.

**Inspector's appraisal and conclusion**

6.11. The proposed modification is a general inclusive statement of the overall transport objective relevant to all members of society. In my view as well as elucidating the transport strategy in relation to the detailed TRN policies it is compatible with Policy STG1 and principle (e) in paragraph 3.5 and specific reference to the disabled is not necessary here.

**RECOMMENDATION**

**6.12. I recommend that the UDP be modified by D/TRAN/19.**

**Policy/Paras 07.011 07.016**  
**Modification ref: D/TRAN/20**

**Issues**

- (i) Paragraphs 7.11 and 7.17 should more fully reflect paragraph 4 of PPG13.
- (ii) The parking strategy is deficient. 'Car parking controls in residential areas will be designed to minimise parking' and 'In new developments car ownership and sprawl will be discouraged' should be inserted.

**Inspector's appraisal and conclusion**

Paragraphs 7.11 and 7.17 should more fully reflect paragraph 4 of PPG13.

6.13. The Government Office for London objects that together with the proposed modification of Policy STG11 these paragraphs do not actively seek to promote accessibility by public transport, walking, or cycling, nor to reduce the need to travel. However, I consider that objection is met by the amendment of modification D/STG11/01 that revises Policy STG11. It is also present under *Environmental transport strategy* in paragraph 7.11. I am satisfied that the clarification of the strategic policy STG11 by modification D/STG11/01 suitably covers these concerns.

The parking strategy is deficient. 'Car parking controls in residential areas will be designed to minimise parking' and 'In new developments car ownership and sprawl will be discouraged' should be inserted.

6.14. To my mind the 3<sup>rd</sup> bullet point under 'parking strategy' in D/TRAN/20 responds appropriately to the first point raised. The second point is an obscure one. The discouragement of car ownership in itself is not in my view a town planning objective

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whereas the use of cars, including the demand for parking space, is so. Discouragement in the UDP rests on the restriction to a maximum parking provision in other parts of the Plan. I support the modification's reference to parking strategy as a realistic approach to the situation.

**RECOMMENDATION**

**6.15. I recommend that the UDP be modified by D/TRAN/20.**

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<b>Policy/Para</b>	<b>07.017</b>
<b>Modification ref:</b>	<b>D/TRAN/18</b>
<b>Further modification ref:</b>	<b>D/TRAN/26</b>

**Inspector's note**

Objection 0109.045 is conditionally withdrawn in response to the modification of strategic Policy STG11 by D/STG11/01. Objections 0109.046 and 0158.065 are conditionally withdrawn in response to the further modification D/TRAN/26.

**Issues**

- (i) The lack of specific mention of the disabled and other vulnerable sections of the community and the loss of emphasis on the pedestrian environment are regrettable. The review on a regular basis of the transport priorities for such members of the community should be a key objective.
- (ii) The second priority encourages environmental irresponsibility and should be deleted. Additional priorities are required to restrain car use and deter unnecessary journeys. The reduction of road traffic as a virtue is not advocated. D/TRAN/26 does not address these matters.

**Inspector's appraisal and conclusion**

The lack of specific mention of the disabled and other vulnerable sections of the community and the loss of emphasis on the pedestrian environment are considered regrettable. The review on a regular basis of the transport priorities for such members of the community should be a key objective.

6.16. While I understand the motivation for this objection it refers to a subject with which town planning controls deal only in so far as changes in the built environment are concerned and much that is relative to the overall objective remains to be achieved through the forthcoming Local Implementation Plan (LIP) that will flesh out in Borough terms the 2001 Integrated Transport Strategy for London.

The second priority encourages environmental irresponsibility and should be deleted. Additional priorities are required to restrain car use and deter unnecessary journeys. The reduction of road traffic as a virtue is not advocated. D/TRAN/26 does not address these matters

6.17. I consider the objector's claim that the objective of achieving safe unobstructed flow of traffic on the highway network encourages environmental irresponsibility is perverse. On the other hand I share the concern inherent in this and other transport objections that the aim of widening the choice of mode of travel is not advocated with sufficient cogency as the means by which the reduction of car travel is to be achieved. Rather than amending the 3rd objective I consider that is best expressed by a modification of the second objective which I shall recommend. In so doing I bear in mind it is only relevant to the UDP in terms of development subject to planning control and that the majority of the objectives identified in D/TRAN/18 and D/TRAN/26 are to be achieved through the LIP.

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**RECOMMENDATION**

**6.18. I recommend that the UDP be modified by:**

- (i) D/TRAN/18, as further modified by D/TRAN/26; and**
- (ii) the wording of the second objective to read:**

**2. to support development conducive to the reduction of travel by private car coincident with the provision of a range of viable alternative modes of passenger transport.**

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**Policy/Para TRN 01**

**Location of development**

**Modification ref: D/TRN01/01**

**Issue**

The modification is inconsistent with other comments.

**Inspector's appraisal and conclusion**

6.19. I consider that this modification is logical. It notably enhances the primacy accorded to non-car movement by eliminating reference to CPZs.

**RECOMMENDATION**

**6.20. I recommend that the UDP be modified by D/TRN01/01.**

**Modification ref: D/TRN01/02**

**Issue**

The modification is retrogressive and appears to encourage more parking, contrary to PPG3 and PPG13.

**Inspector's appraisal and conclusion**

6.21. The modification renders the Policy consistent with that of Policy TRN4 and clearly makes feasible the permission of limited parking provision discretionary on a case-by-case basis. In my view that is a realistic approach and I support it.

**RECOMMENDATION**

**6.22. I recommend that the UDP be modified by D/TRN01/02.**

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**Policy/Para TRN 02**

**Transport and new developments**

**Modification ref: D/TRN02/06**

**Issues**

- (i) The changes in the 2<sup>nd</sup> sentence and the first part of the 4<sup>th</sup> sentence encourage car use.**
- (ii) The replacement of 'sustainability' with 'environmental' is inconsistent with PPG13.**

**Inspector's appraisal and conclusion**

The changes in the 2<sup>nd</sup> sentence and the first part of the 4<sup>th</sup> sentence encourage car use.

6.23. Minimising the number and length of trips generated seems to me to be an altogether superior objective to merely minimising the use of the private car and is highly relevant to the transport implications of new development. So far as concerns the 4<sup>th</sup> sentence of the modification the deletion of 'improvements' is clearly an error.

The replacement of 'sustainability' with 'environmental' is inconsistent with PPG13.

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6.24. I interpret environmental objectives in paragraph 7.21 of the UDP as a subset of the overall national objective of sustainability identified in paragraph 2.2 of the Plan. I consider the change clarifies that in relation to the subject of the Policy.

**RECOMMENDATION**

**6.25. I recommend that the UDP be modified by D/TRN02/06, subject to the insertion of 'improvements' after 'junction' in the 4<sup>th</sup> sentence.**

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**Modification ref: D/TRN02/08****Issue**

The modification encourages car use.

**Inspector's appraisal and conclusion**

6.26. I find the wider effects of development on the general use of the road network are adequately referred to in paragraph 7.20(d) I consequently interpret the replacement of 'capacity' by 'congestion' in paragraph 7.20(e) as referring to the avoidance of potential traffic congestion when considering access to premises. In my view it is overly fanciful to consider that as significantly encouraging car use and I see no justification to depart from the modification.

**RECOMMENDATION**

**6.27. I recommend that the UDP be modified by D/TRN02/08.**

<b>Policy/Para</b>	<b>TRN 03</b>	<b>Green</b>
<b>transport plans</b>		
<b>Modification ref:</b>	<b>D/TRN03/04</b>	
<b>Further modification ref:</b>	<b>D/TRN03/09</b>	

**Inspector's note**

Objection 0109.044 is conditionally withdrawn in response to D/TRN03/09.

**Issues**

- (i) This is another politically motivated change. Users of the policy should be encouraged to subscribe to the idea that they are contributing towards environmental objectives
- (ii) 'Green' should be restored to the Policy title.

**Inspector's appraisal and conclusion**

This is another politically motivated change.

6.28. I consider the further modification appropriately relates mode of travel to a suitable range of environmental objectives.

'Green' should be restored to the Policy title.

6.29. The deletion of 'green transport' and replacement by 'travel' establishes consistency with current national and regional guidance on the nomenclature of this type of plan. I concur with the further modification.

**RECOMMENDATION**

**6.30. I recommend that the UDP be modified by D/TRN/03 and D/TRN03/09.**

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<b>Modification ref:</b>	<b>D/TRN03/05</b>
<b>Further modifications ref:</b>	<b>D/TRN03/07</b>
	<b>D/TRN03/08</b>

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**Inspector's note**

The objections by Mr Mann and the GLA regarding matters appropriate to a Travel Plan are withdrawn in response to the further modifications D/TRN03/07 and D/TRN/03/08 respectively, with which I concur.

**RECOMMENDATIONS**

**6.31. I recommend that the UDP be modified by D/TRN03/05 as further modified by D/TRN03/07 and D/TRN/03/08.**

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**Modification ref: D/TRN03/06**

**Further modification ref: D/TRN03/09**

**Issues**

- (i) Paragraph 7.25 is a blanket statement and should not refer to 'any development'.
- (ii) A developer could refuse to implement a green travel plan with any efficacy.
- (iii) The importance of green travel plans is downgraded. Residents will object to development so major as to require a Traffic Assessment.

**Inspector's appraisal and conclusion**

Paragraph 7.25 is a blanket statement and should not refer to 'any development'.

6.32. The objector claims that green travel plans should refer to non-residential development only. The LPA states that the wording of D/TRN/03/06 was agreed by the previous inquiry inspector. However, it is corrected in relation to the second issue below.

A developer could refuse to implement a green travel plan with any efficacy.

6.33. The objector asserts that encouraging free choice of mode of travel means encouraging car use. However, the further modification D/TRAN 03/09, that I support, makes clear that the objective of devising green travel plans for non-residential development is to reduce dependency on the car.

The importance of green travel plans is downgraded. Residents will object to development so major as to require a Traffic Assessment.

6.34. In my view the further modification D/TRAN03/09, which is supported by the Government Office for London and the GLA, appropriately restores the objective of reducing dependency on car travel.

**RECOMMENDATION**

**6.35. I recommend that the UDP be modified by D/TRN/03/06 as further modified by D/TRN03/09.**

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**Modification ref: X/TRN03/03**

**Issue**

Paragraph 7.25 should state 'where the Council has received a Traffic Impact Assessment for a new residential development it may require the developers to produce a green travel plan, which may be reinforced by planning conditions'.

**Inspector's appraisal and conclusion**

6.36. The objector interprets 'any development' as applying to a new residential development. The text in Paragraph 7.25 of the Plan follows the recommendation in the previous Inspector's Report. As Policy TRN 3 is exclusively concerned with non-residential development I do not consider there is scope for uncertainty about the application of paragraph 7.25 and the modification should be adopted.

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**RECOMMENDATION**

**6.37. I recommend that the UDP be modified by X/TRN03/03.**

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<b>Policy/Para</b>	<b>TRN 04</b>	<b>Car and bicycle parking standards</b>
<b>Modification ref:</b>	<b>D/TRN04/03</b>	

**Issue**

There should be a maximum parking standard of one space per 14m<sup>2</sup> of gross floorspace for Class A1 retail superstore development over 2,500 m<sup>2</sup> in area.

**Inspector's appraisal and conclusion**

6.38. The objector's case for a variation from the one space per 20m<sup>2</sup> standard in the UDP is based on the advice in paragraph 56 and Annex D of PPG13, together with that in PPG6 regarding town centres and edge-of-centre sites. However, that argument was considered in the previous Inspector's Report on the UDP Review and in the absence of evidence of any material change in circumstances I find no reason to recommend varying the maximum standard.

**RECOMMENDATION**

**6.39. I recommend that the UDP be modified by D/TRN04/03.**

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<b>Modification ref:</b>	<b>D/TRN04/04</b>
<b>Further Modification ref:</b>	<b>D/TRN04/13</b>

**Issues**

- (i) Policy TRN5 in the draft UDP Review encouraged car-free and limited car-owning residential development in CPZs with good access to public transport, shops, and services. Under the modification merging it in Policy TRN4 new development will not achieve sufficiently high densities. That will not make the best use of the land, and will reduce the opportunities for housing in general and affordable housing in particular. It is contrary to the objective of achieving sustainable communities in a compact city.
- (ii) The encouragement of more parking in paragraph 7.28 is contrary to PPG3 and PPG13; the original wording should be reinstated and fewer parking spaces provided. The proposed modification to paragraph 7.30 should be deleted. The 2 new paragraphs after 7.30 encourage parking up to the maximum standard and are contrary to paragraphs 52-56 of PPG13.
- (iii) The modification would have an unsatisfactory effect in CPZs, where it is necessary in residents' interests to maintain the maximum parking standards. All areas should be treated equally.
- (iv) The modification is unclear regarding Section 106 Agreements and more restrictions should be imposed on developers, particularly when parking in a CPZ is close to saturation.
- (v) The issue of parking permits is under the control of the highway authority and not the LPA. So long as developments comply with the adopted parking standards no further restrictions should apply.
- (vi) Policy TRN4 should not preclude consideration of other parking options currently under consideration for Richmond Town Centre and should be modified to allow an increase in parking for visitors.

**Inspector's appraisal and conclusions**

Policy TRN5 in the draft UDP Review encouraged car-free and limited car-owning residential development in CPZs with good access to public transport, shops, and services. Under the modification merging it in Policy TRN4 new development will not achieve sufficiently high

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densities.

6.40. The modifications do not change the car parking standards but allow provision of parking up to the maximum permissible, at which level parking is restrained. I accept that they have been devised to clarify the Policy to align it with PPG 13 and to prevent unacceptable overspill parking from new development. I am inclined to agree with the LPA that the combination of a home car space and the non-availability of space at a work or other destination is a discouragement to car use, and hence to sustainability. It seems to me that the opportunities for affordable housing arising from the space not devoted to achieving the maximum permissible parking facilities are likely to be limited though worthwhile. However, I do not attach such weight to them as would alone justify recommending against the elision of Policies TRN4 and TRN5 proposed in the modifications.

The encouragement of more parking in paragraph 7.28 is contrary to PPG 3 and PPG 13; the original wording should be reinstated and fewer parking spaces provided. The proposed modification to paragraph 7.30 should be deleted. The 2 new paragraphs after 7.30 encourage parking up to the maximum standard and are contrary to paragraphs 52-56 of PPG 13.

6.41. I note that D/TRN04/13 carefully defines criteria by which a lesser number of parking spaces than indicated as the maximum standard in Appendix A of the UDP would be acceptable. I regard them a serviceable approach to the restraint of car use in the context of environmental quality. I do not interpret paragraph 7.28 as increasing parking provision; it clearly sets a limit to it.

The modification would have an unsatisfactory effect in CPZs, where it is necessary in residents' interests to maintain the maximum parking standards. All areas should be treated equally.

6.42. The modification arises from the transfer of text from Policy TR5 to Policy TR4 but I note that no change of principle is involved. The distinction between CPZs and other residential areas was clearly established through the previous inquiry. Not all residents will have, or wish to have, a car and CPZs are generally well served by public transport. I consider it is therefore logical and consistent with national and regional planning guidance to encourage car-free or limited car development in such areas.

The modification is unclear regarding Section 106 Agreements and more restrictions should be imposed on developers, particularly when parking in a CPZ is close to saturation.

6.43. I do not find the modification obscure on the purpose of Section 106 agreements. Indeed, it is supported by the GLA. However, its wording is defective in that it does not clearly state who is to be informed that residents will not be eligible for on-street parking permits. I shall recommend an amendment to clarify that.

The issue of parking permits is under the control of the highway authority and not the LPA. So long as developments comply with the adopted parking standards no further restrictions should apply.

6.44. The LPA states that the principle of restricting the eligibility of some residents for parking permits was endorsed by the inspector in the previous inquiry and the modification is merely a consequence of the transfer of text from Policy TR5 to Policy TR4. This matter appears to me to fall under planning control insofar as it may be the subject of a Section 106 agreement as noted in paragraph 7.30 of the UDP.

Policy TRN4 should not preclude consideration of other parking options currently under consideration for Richmond Town Centre and should be modified to allow an increase.

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6.45. This issue is raised by way of objection to the modification of paragraph 7.26 by D/TRN04/13. The objector points out that on-street visitor parking provision in central Richmond means that on-street resident parking permits far exceed the number of on-street resident spaces. It is claimed this could be alleviated by expanding visitor parking space at the Old Deer Park, thus improving the situation for residents and relieving traffic congestion.

6.46. Policy TRN4 seeks to restrain any increase in parking for shopping and apply the maximum parking standards to operational parking. Its overall objective is to promote sustainable transport choices and reduce reliance on the use of cars in accordance with national and regional planning guidance. Parking standards for Richmond and Twickenham town centres were established in the first UDP Review inquiry and are not affected by this modification. Any review of provision in Richmond town centre would therefore fall to be considered under Policies TRN 22 and TRN23. In these circumstances I find no justification for further modification.

### RECOMMENDATIONS

**6.47. I recommend that the Plan be modified by the deletion of Policy TRN 5 and the modification of Policy TRN 4 by D/TRN04/04 subject to the following further changes in the justification:**

**Para 7.29:** after 'usable' delete 'to' and insert 'by';

**Para 7.30, line 11:** delete 'shall' and insert 'will'; and

**line 13:** delete 'they' and insert 'developers'.

**In the second new paragraph after the revised paragraph 7.30, delete commas after 'standards' and 'possible'.**

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#### Modification ref: D/TRN04/10

#### Issue

Educators should set an example.

#### Inspector's appraisal and conclusion

6.48. At schools the modification would provide twice the normal rate of parking space in relation to staff. Though the LPA claims this is within an overall position of restraint it is not otherwise clear why this distinctive provision is prescribed and I find no compelling reason to support it.

### RECOMMENDATION

**6.49. I recommend that the UDP be not modified by D/TRN04/10.**

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#### Policy/Para TRN 05 Car free/ limited car developments

#### Modification ref: D/TRN05/02

#### Issues

- (i) More needs to be done to discourage and reduce car use; Policy TRN5 indicates the Council's awareness of the contribution made to town centre congestion by local traffic and should not be deleted.
- (ii) Development with limited accommodation for cars or car-free development is unlikely to be possible under the revised Policy TRN4.

#### Inspector's appraisal and conclusion

More needs to be done to discourage and reduce car use; Policy TRN5 indicates the Council's awareness of the contribution made to town centre congestion by local traffic and should not

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be deleted.

6.50. The merging of Policy TRN5 in Policy TRN4 follows the previous Inspector's Report which considered it appropriate that the topic be dealt with together with parking standards. I consider that view logical.

Development with limited accommodation for cars or car-free development is unlikely to be possible under the revised Policy TRN4.

6.51. Paragraph 7.30 as proposed to be modified sets out the conditions under which car-free or limited car development may be permissible and in my view suitably deals with objectors' concerns.

**RECOMMENDATION**

**6.52. I recommend that the UDP be modified by D/TRN05/02.**

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<b>Policy/Para</b>	<b>T</b>	<b>RN 08</b>	<b>Pedestrian safety</b>
<b>Modification ref: D/TRN08/01</b>			

**Issue**

The concept of re-allocating space to pedestrians should not be deleted. Policy TRN8 should reflect the fear of dangerous roads.

**Inspector's appraisal and conclusion**

6.53. As the policy includes making road junctions safer for pedestrians and widening pavements where possible I consider that it takes account of the objector's concerns.

**RECOMMENDATION**

**6.54. I recommend that the UDP be modified by D/TRN08/01.**

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<b>Policy/Para</b>	<b>TRN09</b>	<b>Pedestrian routes and security</b>
<b>Modification ref:</b>	<b>D/TRN09/01</b>	
<b>Further modification ref:</b>	<b>D/TRN09/02</b>	

**Issue**

The downgrading of walking from a recreation to a pastime is a deliberate and purposeless trivialisation.

**Inspector's appraisal and conclusion**

6.55. The LPA agrees with the objector and proposes in D/TRN09/02 that 'form of recreation' be substituted for 'pastime', superseding D/TRN09/01. I concur.

**RECOMMENDATION**

**6.56. I recommend that the UDP be modified by D/TRN 09/02.**

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<b>Policy/Para</b>	<b>TRN 12</b>	<b>Cycling</b>
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**Modification ref: D/TRN12/05**

**Inspector's note**

Objections to this modification are conditionally withdrawn in response to D/TRN12/05, with which I concur.

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## RECOMMENDATION

**6.57. I recommend that the UDP be modified by D/TRN12/05.**

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### **Modification ref: X/TRN12/03**

#### **Issue**

The tow path from Chiswick Bridge to Hammersmith is unsuitable for resurfacing as a cycle route.

#### **Inspector's appraisal and conclusion**

6.58. This section of the Thames tow path includes narrow and floodable open stretches and the Mortlake stretch includes remnants of industrial archaeology which are worthy of retention. In my view its resurfacing for cycle use would create an unduly urban ambience.

6.59. The proposed modification to identify the route as 'other route to be investigated' on Map 8 follows the previous Inspector's Report. While I endorse the modification I consider it should be further modified to ensure that in the event of any surfacing work being carried out it should not be detrimental to the interests of pedestrians.

**RECOMMENDATION**

**6.60. I recommend that the UDP be modified by X/TRN 12/03 subject to any surfacing not being detrimental to the interests of pedestrians.**

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<b>Policy/Para</b>	<b>TRN 13</b>	<b>Public transport improvements</b>
<b>Modification ref:</b>	<b>X/TRN13/05</b>	
<b>Further modification</b>	<b>X/TRN13/11</b>	

**Inspector's note**

The objections are conditionally withdrawn, being suitably met by the further modification X/TRN13/11 with which I concur. However, I nevertheless consider that since, being concerned with the design of public service vehicles, it does not deal with a matter subject to town planning control consideration should be given to its more relevant incorporation in the LIP.

**RECOMMENDATION**

**6.61. I recommend that the UDP be modified by X/TRN13/05 as further modified by X/TRN13/11, but that consideration be given to alternatively incorporating it in the LIP.**

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<b>Policy/Para</b>	<b>TRN 15</b>	<b>Transport interchanges</b>
<b>Modification ref:</b>	<b>D/TRN15/02</b>	

**Issue**

The object should be to raise the standard, which is a competitive process.

**Inspector's appraisal and conclusion**

6.62. To my mind the modification is expressed in terms which are overly neutral and it is important to establish a situation where alternative forms of travel can be made at least no less attractive than the car, introducing the objector's concept of competition. I shall therefore recommend retention of the deposit Review Plan version of the 2<sup>nd</sup> sentence of this paragraph.

**RECOMMENDATION**

**6.63. I recommend that the paragraph 7.66 of the UDP revert to the deposit UDP Review Plan form of the 2<sup>nd</sup> sentence.**

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<b>Policy/Para</b>	<b>TRN 17</b>	<b>Road hierarchy</b>
<b>Modification ref:</b>	<b>D/TRN17/03</b>	
<b>Further modification ref:</b>	<b>D/TRN17/10</b>	

**Inspector's note**

The only objection is conditionally withdrawn in response to the further modification D/TRN17/10, with which I concur.

**RECOMMENDATION**

**6.64. I recommend that the UDP be modified by D/TRN17/03 as further modified by D/TRN17/10.**

**Modification ref: D/TRN17/04****Inspector's note**

The only objection is conditionally withdrawn in response to D/TRN/17/04 that amends the 2<sup>nd</sup> sentence of paragraph 7.74. I concur with that change.

**RECOMMENDATION**

**6.65 I recommend that the UDP be modified by D/TRN17/04.**

<b>Policy/Para</b>	<b>TRN 18</b>	<b>Road capacity and traffic reduction</b>
<b>Modification ref:</b>	<b>D/TRN18/03</b>	
<b>Further modification ref:</b>	<b>D/TRN18/04</b>	

**Issues**

- (i) For environmental reasons there should be a target reduction in car travel by 20% rather than 10%.
- (ii) There is an overall safety implication in the shortening of cycle signal times at isolated junctions.
- (iii) The replacement policy omits road safety, pedestrian benefits, environmental benefits, the freeing up of town centres and residential areas from through traffic, and bus priority measures. In spite of the explicit aim to balance the needs of all road users there is an implicit weighting towards the private vehicle. Freeing points of congestion is only a short term solution since easier passage will attract more drivers. The loss of references to resistance to increased traffic capacity on the A205 and encouraging through traffic to use the A316 road in Richmond and Twickenham relinquishes important aims.

**Inspector's appraisal and conclusion**

For environmental reasons there should be a target reduction in car travel by 20% rather than 10%.

6.66. I agree with the LPA that the matter of the overall target reduction is a strategic matter which is appropriately addressed under Policy STG14.

There is an overall safety implication in the shortening of cycle signal times at isolated junctions

6.67. I note that safety implications are taken into account when changes in traffic management are proposed. That is a matter of highway management rather than a town planning issue and is germane to the LIP rather than the UDP.

The replacement policy omits road safety, pedestrian benefits, environmental benefits, the freeing up of town centres and residential areas from through traffic, and bus priority measures. In spite of the explicit aim to balance the needs of all road users there is an implicit

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weighting towards the private vehicle.

6.68. The LPA takes on board the matters of road safety, pedestrian benefits, and environmental benefits. Clearly, much depends on the vigour with which they are likely to be pursued and the respective weight to be attached to them, a matter on which the objector clearly expresses doubts. However, I note they are already dealt with in TRN Policies 7, 8 and 10. The LPA consequently proposes in D/TRAN18/04 that they be cross-referenced at the end of D/TRAN18/03. I consider there is considerable risk of indigestible repetition in this Chapter of the Plan and I concur with the LPA's proposal.

**RECOMMENDATION**

**6.69. I recommend that the UDP be modified by D/TRAN18/03 as modified by D/TRAN18/04.**

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<b>Policy/Para</b>	<b>TRN 19 07.92</b>	<b>Highway improvement and safeguarding</b>
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**Modification ref: D/TRN19/02**

**Issue**

Bus movement should be a priority.

**Inspector's appraisal and conclusion**

6.70. I consider this aim is implicit in Policy TRN13, section (f) of paragraph 7.56 and section (e) of Policy TRN20. The omission of 'particularly to buses' in paragraph 7.92 by D/TRN19/0 appropriately eliminates a tautology.

**RECOMMENDATION**

**6.71. I recommend that the UDP be modified by D/TRN19/02.**

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<b>Policy/Para</b>	<b>TRN 21</b>	<b>Traffic in Royal Parks</b>
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**Modification ref: D/TRN21/03**

**Issue**

The wording is weaker than the previous version and should either remain unchanged or be strengthened to discourage car use.

**Inspector's appraisal and conclusion**

6.72. The roads in Richmond and Bushy Parks are not under the Council's control. The burden of the modification is that the Council undertakes to consider rather than unreservedly support proposals emanating from the Royal Parks Agency including the reduction of through

Park traffic by 5% and the improvement of the Park environment. The Council claims the change more realistically reflects the nature of its experience of contact with the RPA. No justification for the RPA's proposals for Richmond Park has been published, no assessment of the effect of them on traffic conditions outside the Park has been made, and full public consultation has been denied. From the LPA's recital of contacts with the RPA and the identification of these concerns I accept that the modification, that I support, does not in any technical planning sense weaken its attitude to potential changes in the Parks.

**RECOMMENDATION**

**6.73. I recommend that the UDP be modified by D/TRN21/03.**

**Modification ref: D/TRN21/03****Issue**

'During daylight hours' should be restored otherwise the Council could press the RPA to open Richmond Park to night time traffic.

**Inspector's appraisal and conclusion**

6.74. As the Park is inaccessible to vehicular traffic when it is closed at night I consider it logical to omit reference to daylight hours, particularly as the Council has no proposals to press the RPA to open the Park to vehicular traffic at night.

**RECOMMENDATION**

**6.75. I recommend that the UDP be modified by D/TRN21/03.**

**Modification ref: D/TRN21/05****Issue**

The Council's intention to support proposals to enhance the environment in the Royal Parks should be restored.

**Inspector's appraisal and conclusion**

6.76. The Council claims the change more realistically reflects the nature of its experience of consultation with the RPA. From the LPA's recital of such contacts I accept that the modification does not imply any diminution in the vigour of the Council's stance on potential changes in the Parks and I support it.

**RECOMMENDATION**

**6.77. I recommend that the UDP be modified by D/TRN21/05.**

**Policy/Para** TRN 22

**On-street parking**

**Modification refs:** D/TRN22/01

**Issue**

Save for its last part the modification downgrades the restraint of car use.

**Inspector's appraisal and conclusion**

6.78. This Policy essentially concerns ease of access to roadside premises by all road users. I do not infer from it the implication alleged by the objector nor that it weakens the Council's attitude to long term commuter parking.

**RECOMMENDATION**

**6.79 I recommend that the UDP be modified by D/TRN22/01.**

**Modification ref: D/TRN22/02****Issue**

The second change downgrades car restraint.

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**Final Version**

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**Inspector's appraisal and conclusion**

6.80. I do not infer from paragraph 7.105 of the UDP the implication alleged by the objector. On the contrary, I interpret the modification as an appropriately balanced response to the aims of safety, business vitality, and residential amenity.

**RECOMMENDATION**

**6.81. I recommend that the UDP be modified by D/TRN22/02.**

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**Modification ref: D/TRN22/04****Issue**

This modification eliminates restraint of car use.

**Inspector's appraisal and conclusion**

6.82. I find the modification a somewhat double-edged one. While serving to control commuter parking by limiting its occurrence in residential areas it could increase the attraction for local residents to own cars in areas affected by commuter parking where alternatives to on-street parking are difficult to find. However, it does appear to me to offer on balance a useful means of serving the LPA's objective of limiting commuter parking.

**RECOMMENDATION**

**6.83. I recommend that the UDP be modified by D/TRN22/04.**

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**Modification ref: D/TRN22/08****Issue**

The deletion of 'sustainable' undermines the proper use of land.

**Inspector's note**

There is no modification with this reference number and it does not therefore fall to me to make any recommendation.

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**Policy/Para            TRN 25**  
**Modification ref: D/TRN25/03**

**Parking charges****Issue**

It is not clear whether 'all groups' includes residents. Clarification is required regarding parking charges for residents.

**Inspector's appraisal and conclusion**

6.84. I consider D/TRN25/03 meets the objection by eliminating reference to 'all groups'. Levels of parking charges are more appropriately a matter for the LIP.

**RECOMMENDATION**

**6.85. I recommend that the UDP be modified by D/TRN25/03.**

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**Modification ref: D/TRN25/05****Issue**

The former reason for the policy was honest.

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**Final Version**

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**Inspector's appraisal and conclusion**

6.86. This objection appears to relate to the reference in paragraph 7.121 of the UDP to the use of surplus income derived from parking charges. Other than perhaps a reversion to the original wording it is not clear what the objector would prefer. However, since levying of charges is not a matter pursued under town planning powers it is not material to the UDP. I therefore support D/TRN25/05 as a purely informative contextual note.

**RECOMMENDATION**

**6.87. I recommend that the UDP be modified by D/TRN25/05.**

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<b>Policy/Para</b>	<b>TRN 29</b>	<b>07.135</b>	<b>Air transport</b>
<b>Modification ref:</b>	<b>D/TRN29/07</b>		
<b>Further modification ref:</b>	<b>D/TRN29/10</b>		

**Issue**

The modification should refer to the planning condition regarding air pollution attached to the planning permission for Heathrow Terminal Five together with the flight number and noise contour conditions. The importance of rejecting Runway 3 is even greater as 30,000 people could suffer unacceptable air pollution. The reference to large scale demolition of houses is insufficiently explicit and the loss of dwellings necessitated by construction should be differentiated from that needed for operation.

**Inspector's appraisal and conclusions**

6.88. It appears to me that the LPA is in no doubt about the importance of requiring conformity with the air pollution conditions and noise contours imposed on the planning permission for Heathrow Airport Terminal 5. However, how they would be imposed is not clear. Nevertheless, I support D/TRN29/07 as an expression of the Council's intentions, subject to the addition of a reference to noise pollution proposed by the LPA as D/TRN29/10. However, in view of the government's now published long term proposal for a third runway at Heathrow the LPA may wish to amend its reference to that development in the modification. While the distinction in reasons for demolition is an important one, the LPA provides no information on its effect on the housing stock of the Borough.

**RECOMMENDATION**

**6.89. I recommend that the UDP be modified by D/TRN29/07 as further modified by D/TRN29/10 but that further consideration be given to amending the reference in paragraph 7.135 to a third runway at Heathrow Airport.**

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**Modification ref: D/TRN29/08**

**Issues**

- (i) There will be need for affordable housing and an increase in car travel resulting from the additional employment generated by the growth of air traffic at Heathrow. The concomitant increase in air pollution is not sustainable.
- (ii) The unsustainable predicted increase in air traffic at Heathrow would be curtailed if the exemption of aviation fuel from tax ceased.
- (iii) A cap on noise levels is needed.
- (iv) The implication that growing demand for air travel must be met but not at Heathrow expresses a NIMBY stance devaluing the supportable points made against development there. The replacement paragraph 7.135 should reject the government's projections and reassert that some management of the demand for air travel is vital.
- (v) Paragraph 7.136 of the UDP should not be deleted.

**Final Version**

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**Inspector's appraisal and conclusion**

6.90. There will be need for affordable housing and an increase in car travel resulting from the additional employment generated by the growth of air traffic at Heathrow. The concomitant increase in air pollution is not sustainable.

6.91. D/TRN29/08, together with other proposed modifications, updates Policy TRN28 consequent on the approval of Heathrow Terminal Five. I note the LPA's concern that the conditions attaching to the number of flights be observed and its sustained objection on the grounds of an exacerbated demand for affordable housing, noise, and air pollution in the event of any proposal for a third runway. The recognition that road traffic is a major source of

pollution has prompted the Council to define an Air Quality Management Area and devise an Air Quality Action Plan. The modification acknowledges the possibility that increased car travel generated by a third runway could increase air pollution.

The unsustainable predicted increase in air traffic at Heathrow would be curtailed if the exemption of aviation fuel from tax ceased.

6.92. While the objector maintains that growth in air traffic could be curtailed by the exemption of aviation fuel from tax that is a national fiscal matter outside the scope of the UDP.

A cap on noise levels is needed.

6.93. The conditions imposed on the planning permission for Terminal Five include a restriction on the overall number of flights and the imposition of noise contours to require a cap on noise levels. The Plan explicitly advocates their observance.

The implication that growing demand for air travel must be met but not at Heathrow expresses a NIMBY stance devaluing the supportable points made against development there. The replacement paragraph 7.135 should reject the government's projections and reassert that some management of the demand for air travel is vital.

6.94. This is a matter for resolution at national level and inappropriate to a single Borough UDP.

Paragraph 7.136 of the UDP should not be deleted.

6.95. The deletion of paragraph 7.136 is also interpreted as weakening the Council's stance against future airport development. However, I consider the Council is correct in regarding the criteria in the government's evolving National Airports Strategy as the proper context for considering the impact of civil aviation on the Borough area.

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**RECOMMENDATION**

**6.96. I recommend that the UDP be modified by D/TRN29/08.**