

The Planning Inspectorate

406, Kite Wing
Temple Quay House
2, The Square
Temple Quay
Bristol BS1 6PN

Direct Line 0117-372-8902
Switchboard 0117-372 8000
Fax No 0117-372 6241
GTN 1374-8902

Ms Gillian Norton
Chief Executive
Richmond upon Thames London Borough
Council
Civic Centre
TWICKENHAM
Middlesex
TW1 3AA

Your Ref:

Our Ref: DP446

Date:

Dear Madam

INSPECTOR'S REPORT INTO OBJECTIONS TO THE RICHMOND UPON THAMES UNITARY DEVELOPMENT PLAN REVIEW MODIFICATIONS

1. I was appointed by the First Secretary of State to hold a public Inquiry into objections to the deposit draft of the modifications of the Richmond upon Thames Unitary Development Plan Review. A pre-inquiry meeting was held on Tuesday 9 March 1999 to make necessary procedural arrangements. The Inquiry was held in 3 series of sessions, from 1 July 2003 to 11 July 2003, from 14 October 2003 to 16 October 2003, and from 8 December 2003 to 18 December 2003. During the Inquiry I held 2 'round table' sessions to deal with issues relating respectively to the Hampton Waterworks site and to various matters raised by Twickenham Green Party. The Inquiry was formally closed by written notice on 16 January 2004. I made various accompanied and unaccompanied site inspections during and after the inquiry period. I attach my Report which contains my recommendations on the action which the Council should take in respect of all the objections, including the counter objections to the Proposed Modifications and Further Proposed Modifications which the Council asked me to consider.

2. The Modifications of the Review of the Plan were prepared by the Council of the London Borough of Richmond upon Thames under the Town and Country Planning Act 1990 in accordance with the Development Plan Regulations. The Plan will supersede the Richmond upon Thames Unitary Development Plan approved in 1996.

3. The Modifications were placed formally on deposit from 3 January until 14 February 2003. Further Modifications were proposed in response to representations following that deposit and were on deposit in a consultation period from 22 April until 3 June 2003. They included the new Policy D/ENV X River Crane Area of Opportunity. Further consideration was then given by the Council to the Crane Valley, including the Richmond upon Thames College site, and further modifications affecting sites in that part of the Borough were placed on deposit from 1 August 2003 until 12 September 2003. Where changes to the Deposit Plan have been proposed by the Council but have not been formally placed on deposit, as in the case of those submitted only at the Inquiry, it will be for the Council to consider further modifications

procedure.

4. At the start of the Inquiry it fell to me to consider 10,589 representations made in respect of the Deposit Modifications Plan by 2,596 individual respondents. No Policy and its justification, area-specific Proposal, or Proposal Map matter received more than 2 expressions of support. Following the second deposit period there were a further 199 objections and 83 conditional withdrawals. In response to the third deposit period, which solely concerned the Crane Valley Proposals, there were a further 171 objections and 22 expressions of support. 310 objections were heard at the Inquiry, the remainder being dealt with by means of written representations.

5. As this is a report into the objections to the proposed Modifications to the Review Plan I make no reference to any proposed matters which were subject solely to supporting representations. Where objections repeated those considered at the previous Inquiry I have indicated where no new material considerations have arisen to affect the Council's decision based on its responses to the recommendations in the Inspector's Report on objections to the Review Plan in the previous Inquiry.

6. Many representations were made in identical terms to a Policy, the Proposals Map, and a Proposal or the respective justificatory texts. I have dealt with such objections in only one place in my Report, either in the Policy where the matter is a general matter common to various Proposals or in Chapter 11 Local Areas in the case of specific matters distinctive of individual site Proposals. Where necessary I have accordingly cross-referenced various matters to other parts of the Report. In the case of the Crane Valley I deal with the UDP's overall concept under Policy CCEX and with detailed matters specific to individual sites in the Twickenham local Proposals in Chapter 11 of the Report.

7. A further problem arose in connection with the school sites in that the proposed Modifications have general implications for both the alternative use of either Metropolitan Open Land or the Council's own category of Other Open Land of Townscape importance. The matter is germane to both Chapter 4 and Chapter 9 of my Report as it is common to the Council's Core Proofs 2 and 3. I have treated the general issues of the de-designation of MOL and OOLT Chapter 4, where I also discuss the new policy D/ENV X on the Crane Valley Area of Opportunity. I have examined the general education issues under Policy CCE 8 in my Chapter 9 as I consider it raises matters different from those affecting land involved in the Crane Valley Proposals. I refer to individual Crane Valley site Proposals in the Twickenham section of Chapter 11 and school site Proposals in each appropriate local area in that Chapter.

8. In view of the large number of objections to certain Proposals I have listed all representations as an appendix rather than in the body of the Report in the interest of producing a document in which it will be easier to trace particular matters in a Report free from the intrusion of lists of representations which on certain matters would otherwise have been significantly longer than the text itself.

Main Issues

9. Whereas many of the Policies and site-specific Proposals for local areas were not challenged the representations showed a very strong concentration of interest in, and overwhelmingly of objection to, certain site-specific matters. Two principal types of matter dominated the range of representations received, both being indicative of potential changes in planning policy in the Borough since the original deposit of the draft UDP Review preceding the previous Inquiry. On the one hand, emerging changes in the Council's education policy had planning repercussions in Proposals for a new school, the rebuilding of schools, or expansion of school buildings. On the other hand were the Proposals to improve the area of the Crane Valley. A further matter of wide general interest was the proposal to improve Twickenham

Riverside on which you have already received my Report. An application for planning permission for the development of that site was called in by the First Secretary of State who held an Inquiry after the closure of the UDP Review Modifications Inquiry.

Strategy

10. The modifications to this part of the Plan, but also widely to some other parts, attracted Objections on the ground of the deletion of 'sustainable' at various points in the text. On the whole I have taken the view that the substitutions made by the Council throughout the Plan serve to clarify it in a helpfully explicit way but nevertheless in the light of the national policy which is clearly quoted in paragraph 2.2 of the draft UDP Review. I have, however, recommended in respect of a few passages in Part 2 the retention of reference to sustainability where I consider it necessary.

11. I have drawn attention in 2 cases to matters which fall outside planning control and also occur in the Part 2 Transport policies. These concern pollution caused by public service vehicle exhaust emissions, a matter that falls to be controlled by legislation which is not part of planning control. The title of Policy STG 3 was not the subject of objection but I have suggested, though not as a formal recommendation, that the Council may wish to consider amending it to eliminate an obvious ambiguity.

Implementation

12. In the case of Policy IMP 3 I have recommended that reference be made to live/work units, an emerging development trend, and in that of Policy IMP 4 I have considered it helpful in the interest of applicants for planning permission that specific reference be made to paragraph 7 of DoE Circular 1/97.

Open Environment

13. Proposals for various school sites, the Gothic site, and Crane Valley sites which generated objection to other parts of the Plan were also the subject of objections to Policy ENV 1 and the Proposals Map. I have cross-referenced these to my consideration of them in Chapter 11 of the Report. On the other hand I recommend as a Green Belt issue under Policy ENV 2 that redevelopment should not impede any reinstatement as a leisure facility of the light railway that formerly served Hampton Waterworks. The designation of the Brunel University site in Twickenham as an OOLTI site was an administrative oversight on the Council's part and I support its deletion.

14. While I support Policy D/ENV X River Crane Area of Opportunity as an attempt to knit together in a coherent open space scheme a diverse series of individual sites as a recognisably dominant and welcome feature of the anatomy of that part of the Borough I do not support it in respect of the Proposals for the former Mereway Allotments (T34) and Twickenham Rifle Club (T36), since I regard them as essential components of any open space system based on the valley. While the loss of revenue from their sale for residential development would limit the overall opportunity for improvement of the Master Plan area I consider the residential development of these cardinaly important sites would negate the objective of the scheme. On the evidence before me it appears that a more modest scheme derived in partnership with the local community and eliciting their assistance in securing external funding would be more appropriate. In terms of Modification D/ENV X I consider my recommended changes adequate to provide the policy context for that scale of improvement.

Built Environment

15. Objections to this part of the Modifications attracted comparatively little objection,

reflecting in my view their inherent soundness. I have, however, drawn attention to the prompt action needed to devise the supplementary planning guidance on energy consumption promised in paragraph 6.105 of the UDP Review.

Transport and development

16. On transport I have been concerned that the UDP should be quite clear about matters which fall to be controlled under planning legislation and those which are germane to the Local Implementation Plan for transport. While such matters as the Council's preference in motor vehicle fuels are noted only as encouragements they are not a town planning matter. A problem of a different type and scale arises in relation to the growth of Heathrow Airport which, as the Council's response to objections observes, is a national matter and my recommendation is framed accordingly.

17. Various objectors express concern that, as they interpret them, the UDP Review Modifications regarding transport fail to take a forceful stand in favour of planning policies which could secure a reduction in car use. Indeed, they see them as encouraging more extensive use of cars. I do not question that there is a degree of change of emphasis on this subject implicit in the Modifications but I nevertheless support the Council's approach based on seeking a reduction in car use by encouraging the expansion of public transport facilities to improve the choice of alternative modes of movement.

18. I have supported the elision of Policies T4 and T5. Contrary to the belief of some objectors I do not accept that it betokens the relaxation of a restrictive approach to car use.

19. As a result of the pre-inquiry deletion of Proposal T26 it did not fall to me to make any recommendation save on the statement proposed by the Council regarding interchange between rail routes at Twickenham station. However, there were no objections to paragraph 7.137 of the UDP but in view of the deletion of Proposal T26 your Council may wish to consider whether it is appropriate to maintain that reference to a south orbital rail link.

20. I deal with objections concerning Proposals affecting car parks in Richmond (R4) and Teddington (D17) in the appropriate local sections of Chapter 11 of the Report.

Housing and Population

21. I support Modification D/HOUS/15 subject to amendments to secure consistency with Policies STG 6 and HSG1 and to identify the unconventional (institutional etc) housing capacity of the Borough to establish consistency with the draft London Plan. The adoption of the proposed Modification Policy HSG X is not recommended as I consider it would deal with matters which are adequately subject to control under other policies.

22. In considering affordable housing in Policy HSG 6 I have taken account of the Borough's very high housing cost/household income ratio. For that reason I have recommended that a total of 50% of new dwellings should be affordable housing, but that it should comprise 40% social rented housing and a further 10% housing for those on low to moderate incomes in the key worker category. I have also recommended that reference to elderly households be restored to the reasoned justification for this Policy. While the Council seeks to lower the threshold for the size of site at which a proportion of affordable housing will be required to be provided this remains a matter currently subject to wide consultation by the government. In the circumstances I have recommended a conservative approach appropriate at the present time and have not recommended the adoption of Modification D/HSG06/12. However, this is a matter the Council will wish to review in the event of any formal change in national policy.

23. On higher density housing I have recommended an alternative to the proposed Modification D/HSG11/03 in which I identify the suitability of town centres and locations well served by public transport for small units for one person households.

Employment and Economic Activity

24. I have recommended replacement modifications to strengthen the Council's support for the retention, subject to environmental considerations, of viable hotels and guesthouses.

Community Culture and Entertainment

25. Policy CCE9 explains the Borough-wide significance of the Council's argument about school expansion into either Metropolitan Open Land or Other Land of Townscape Importance. To some extent consideration of this matter is made difficult because, as became apparent in the Inquiry, the Council's Borough-wide plans for education, more particularly for secondary education, have not reached the same state of evolution as the UDP Review. While it is not appropriate for me to comment on the educational philosophy inherent in the Council's views on the provision of secondary school places I have accepted that its aspiration as Local Education Authority to provide post-16 education in its own schools is reasonable. I also accept that the extent of that demand in the Plan period is subject to such factors as not easily predictable variations in the proportion of Borough pupils seeking places and the degree of intake from other LEA areas, the attraction of the private education sector, and the question of the provision of a Roman Catholic secondary school. On balance I have supported the school proposals on the ground that they nevertheless reflect an exceptional need for building space that justifies the de-designation of various tracts of Metropolitan Open Land and 2 areas of OOLTI which, with the exception of an area at Heathfield Recreation Ground, are within school curtilages. I have considered that rectifies a former possibly overly zealous intention to protect open land regardless of future educational needs. Individual school sites are dealt with in the Report under their respective local areas.

Town Centres and Shopping

26. Nearly all of the proposed Modifications in this part of the UDP follow recommendations in the previous Inspector's Report. I have not, however, recommended the adoption of Modification D/TOWN/11 as it does not conform with national guidance in PPG6 and a similar approach has not been supported in the Panel Report on the draft London Plan.

Area Proposals

Barnes

27. While I regard the Proposal (B2) to develop the former goods yard at Barnes station as logical in view of its separation from the Common by the railway I have treated it as a sensitive site and have recommended a planning brief be drawn up covering matters I have identified as significant.

28. Regarding Barn Elms (B5) while it is clear that the first preference of the objector would be that the Council permit no lighting at the Barn Elms sports ground I have considered that would be an unreasonable restriction on the use of the facility. In my view the Council's Modification allows assessment with realistic precision on a case by case basis of any proposals for lighting appropriately related to the activity it would be intended to facilitate.

Ham and Petersham

29. I support the Modification of the MOL in the curtilage of Grey Court School in the

interest of the necessary educational provision.

Hampton and Hampton Hill

30. Although the boundary of Proposal H1 at Hampton Water Treatment Works does not extend to the River Thames I have recommended that the justification for the Proposal should have regard to pedestrian and cycle route links to the riverside.

Richmond

31. I have supported Proposal R4 for the development of Friars Lane car park. Wider matters raised by objectors concerning the amount and distribution of parking space in Richmond and the categories of users are for the Council to consider under the Local Implementation Plan for transport. My recommended further Modification of D/R09/1 (Land at the rear of 10 Kings Road) is consistent with that relating to the restoration of reference to housing for the elderly in housing policy generally. In view of current uncertainty about the redevelopment of Richmond station and any concomitant change at Church Road bridge I have recommended the deletion of Proposal R11.

32. Of the 3 Proposals for sites at Petersham Road I support that for Langholm Lodge (R16) which is a developed site. I find Terrace Yard (R17) is not a visually significant open area in terms of the *Arcadian* project and I support the Proposal. I have concluded that no part of the Gothic site (R18), one of the succession of characteristic pocket parks affording some depth of public open space to the Richmond waterfront south of Richmond Bridge and a component of the *Arcadian Thames* area, should be the subject of residential development.

Teddington and Hampton Wick

33. For pressing educational reasons I have supported the Proposal for Collis Primary School (D10) and Teddington School (D14). In the former case I recommend the revised OOLTI boundary be adjusted to coincide with the extent of the playground. In the case of Teddington School I have recommended that reference be made in the justification to the part that open space in the Normanfield development could play in affording school sports playing facilities.

34. It appears to me that Teddington Town Centre is undergoing change in the pattern of shopping and that it is liable to continue. I have consequently recommended that the Proposal for North Lane Depôt and east car park (T17) should not be pursued but that the situation should be kept under review as a more stable pattern of uses in the town centre emerges.

Twickenham

35. You have already received my Report on the Twickenham Riverside Proposal T1. The details of the redevelopment of that site will be dependent on the decision of the First Secretary of State following the called-in Inquiry.

36. The open space in the Waldegrave School curtilage is almost entirely obscured from public view. I have concluded that it does not merit its OOLTI designation.

37. The other principal Proposals in Twickenham fall in the area of the Crane Valley Master Plan. In considering the individual sites I have taken account of the indicative proposals in the first 2 options of the range of 4 presented to the Council. I have concluded that Mereway Allotments (T34) and Twickenham Rifle Club (T36) should not be de-designated from Metropolitan Open Land status and that the Proposals should be amended to recognise their open land function in the green corridor of the Crane Valley.

38. Mereway Allotments (T34) was the most controversial individual Proposal not only in the Crane Valley but in the Borough as a whole. In my recommendation to delete the Proposal I am in no doubt that residential development on this site would patently negate the objectives of any scheme promoting the Crane Valley as a coherent system of linked open spaces. I can understand how a casual observer could see the Twickenham Rifle Club land (T36) as visually unprepossessing with both the land and the clubhouse conveying a strong impression of neglect. Contrary to the Council's consultants' Master Plan I regard the openness of this land, notwithstanding its current state, as another essential component in the linkage of open land through the valley and the provision of a through pedestrian and cycle route. I acknowledge that there would be problems of security to be overcome but it will be for the Council to show that they are not insuperable.

39. I am satisfied that if Richmond upon Thames College, (T37) is to be redeveloped as a unitary site in accordance with the preference of the College authorities it is not possible to accommodate it at the Sorting Office site (T4) and that the redevelopment should take in the land in College ownership south of the A316. That excludes any possibility of relocating the whole of the Cranford Depot (T18) activities to that site which I consider in any case unsuitable for such development. The question arises of what parts, if any, of the depot activities would remain there if complete relocation were not to take place. I have concluded that the amount of redevelopment for housing on the depot site should not only be dependent on the extent of land released by any reorganisation of the various depot activities but also on the character of those which would remain. However, I have also recommended that the pump house be retained on account of its character and that the small tract of land designated MOL inside the western edge of the depot site remain so designated.

40. I consider Harlequins Rugby Ground (T35) does not satisfy the test of MOL designation and have accordingly supported the Proposal that it be de-designated with part of the site allocated for housing and the practice area be designated OOLTI.

41. I have referred under the Transport heading to Proposal T26. Its deletion clearly meets all the objections to it.

Whitton and Heathfield

42. The Heathfield School Proposal (T15) generated very many objections, in large part on account of the alienation to school use of part of Heathfield Recreation Ground. In my view the LEA's intentions in respect of this site appear less developed than in the case of others, its evidence being open to a degree of speculation regarding the nature of any secondary school development. However, I have accepted that in terms of the general problem of providing adequately for secondary education in the Borough this currently under used site has a part to play which with due regard for the UDP Dual Use Policy CCE9 justifies the Proposal.

Format and Scope of Report

43. I have structured this report so that it broadly follows the order of the plan itself and have, in the interests of reduced reporting time, adopted an issues-based reporting style rather than one in which the cases of the objectors and the Council are reported in full in separate sections. Objections made in writing are given equal weight to those made orally at the Inquiry. I append to the Report a Schedule of recommendations. Appendices include a schedule of objections in policy number order; a schedule of objections in objector number order; a list of those appearing at the Inquiry; a schedule of Inquiry library documents; and the Inquiry timetable. These appendices were produced for me by the Programme Officer using the Council's database. A full set of all documents can be found in the Unitary Development Plan Library held at Twickenham Civic Centre.

44. In all Chapters the Report is based upon a 2 element numbering system to reflect Chapter and Paragraph in that order.

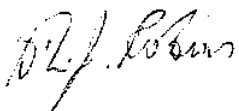
45. Where particular elements of the Deposit Plan have been subject to objections (whether resulting in a Proposed Change or not) these are considered in this Report. Where the proposed changes have themselves been subject to objections, these objections are also considered. Where changes have been proposed by the Council for reasons other than objections to the Deposit Plan and have not themselves been subject to objections, these matters are not before me and I make no comment on their merits.

46. This consideration of some policies and paragraphs of the Deposit Plan Review Modifications and the Proposed Further Modifications derives from my remit to consider only those aspects of the plan which are the subject of duly made objections. It is an inevitable consequence of the statutory procedures relating to UDP preparation and may lead to inconsistencies and incongruities between individual elements of the plan which it is not within my remit to address. It is for the Council, in considering my recommendations, to ensure that any inconsistencies and incongruities which result from this inevitably partial appraisal are identified and resolved.

47. Unless otherwise stated any reference to Government Policy as set out in Circulars or planning policy guidance relates to those that were extant at the close of the Inquiry. The Council will no doubt wish to have regard to any subsequent revisions to Government policy which may occur before the adoption of the plan.

48. Finally I would like to record my appreciation for all the help afforded me by participants in the Inquiry. In particular I am indebted to my two Programme Officers, initially Mrs Sarah MacAskill and latterly Mr Geoffrey Bengel, who performed their duties with meticulous attention to detail and with great efficiency and good humour in sometimes most exacting circumstances.

Yours faithfully



D L J Robins BA PhD FRTPI