

London Borough of Richmond upon Thames – Local Plan Examination 2017

Statement of Common Ground –

London Borough of Richmond upon Thames and Transport for London / Greater London Authority on behalf of the Mayor of London

Transport for London, on behalf of the Greater London Authority and the Mayor of London, in their representation dated 22 February 2017 to the Publication Local Plan consultation, made a number of comments.

In addition, the Council has been liaising with Transport for London and the Greater London Authority on what changes the Mayor would seek to bring LP 45 into *general conformity* with the London Plan.

This Statement of Common Ground seeks to establish areas of agreement between the London Borough of Richmond upon Thames and the Mayor of London and also proposes resulting minor changes and modifications to the Publication Local Plan as submitted for independent examination in public. The Inspector is asked to consider these minor changes / modifications, which are acceptable to and have been agreed by both parties.

The Statement also identifies areas where agreement has not been reached and which may require further discussion during the examination / hearing sessions.

This Statement of Common Ground deals specifically with Policy LP 45 Parking Standards and Servicing, including Appendix 3 Parking Standards . Note that a separate Statement of Common Ground has been prepared with the Greater London Authority on behalf of the Mayor in relation to Site Allocation SA 8 St Mary's University.

Background

The Council's response to the procedural letter, dated 27 July 2017, set out that engagement and liaison between the Mayor of London and Richmond Council has been and continues to be taking place with officers at the Greater London Authority (GLA) and Transport for London (TfL). The letter of 27 July confirmed that the Mayor of London has agreed to produce a Statement of Common Ground with Richmond Council in relation to policy LP 45 Parking Standards and Servicing, including Appendix 3 (as well as policy SA 8 St Mary's University).

The letter reiterates that in relation to Policy LP 45 (Parking Standards and Servicing) and Appendix 3, the Mayor seeks the Local Plan to state clearly that the standards proposed are 'maximum'. As set out in Policy LP 45, the standards proposed are 'maximum', although it is acknowledged that the supporting text to the policy clarifies that the Council would usually seek those standards to be met unless there are site specific circumstances; this is generally assessed on a case by case basis. The Council's reason for this policy approach is because the borough has high levels of car ownership within fairly densely developed residential areas with some narrow streets and where many properties have no off-street parking, and where public transport availability and reliability can be variable. The main purpose of the policy is therefore to ensure that the necessary sufficient on-site car parking is provided to meet the needs of occupiers whilst ensuring excessive on-street parking demand is not created that could then adversely impact on the efficient operation of the highway network and local amenity. The Council commissioned consultants (AECOM) to produce a transparent analysis of options on potential parking standards (SD-039), which has been carried out in line with paragraph 39 of the NPPF. It should be noted that the provision towards the upper end of the maximum car parking standards has also been recommended by the consultants.

Minor changes / modifications to Policies LP 44 and LP 45:

The following has now been agreed between both parties:

Text proposed to be inserted in **bold underlined**
 Text proposed to be removed in ~~red strikethrough~~

Section / Policy	Transport for London on behalf of the Mayor of London response	LBRuT response	Reason for Change	Common Ground Agreed?
Policy LP 29 – Education and Training	With respect to identifying locations for new educational facilities and Local Plan policy LP29 – Education and Training reference should be made in section 8.24 to specify that access by public transport should be a consideration to reduce traffic impacts.	The Council considers that additional wording in this regard is acceptable; however, it is considered better to add the additional sentence to paragraph 8.2.9, which deals with the identification of sites, rather than 8.2.4. Amend paragraph 8.2.9 to include additional sentence at end to read: <u>“Access by public transport should be a consideration in reducing traffic impacts when identifying locations for new educational facilities.”</u>	For clarity and to ensure that public transport accessibility is a consideration when identifying locations for new educational facilities	Agreed
Policy LP 44 Sustainable Travel Choices	Overall policy approach to Sustainable Travel Choices is acceptable	Support noted	No changes required	Agreed
Policy LP 44 B – Walking and cycling	Support	Support noted	No changes required	Agreed
Policy LP 44 C – Public Transport	Support	Support noted	No changes required	Agreed
Policy LP 44 G – Taxis and private hire vehicles	Change paragraph 11.1.16 as follows: “Taxi ranks should be conveniently located <u>close to the venue they serve</u> and accessible for all with adequate space for customers to queue”.	The Council agrees the minor proposed change as follows: “Taxi ranks should be conveniently located <u>close to the venue they serve</u> and accessible for all with adequate space for customers to queue”.	For clarity	Agreed

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Policy LP 44 G – Taxis and private hire vehicles	Reference should be made within Policy LP44G to TfL’s Ranks Action Plan (2015).	Paragraph 11.1.16 of the supporting text already refers to the Transport for London's Ranks Action Plan (2015) and this is considered to be sufficient without a further reference within part G of the policy.	N/A	Agreed
Policy LP 44 – Infrastructure delivery	The Infrastructure Delivery Plan (IDP) and Infrastructure Delivery Schedule (IDS) were prepared in 2012 and 2013 respectively. It is recommended that with respect to the Local Plan, the emerging London Plan and Mayor’s Transport Strategy and TfL’s Business Plan that these documents are reviewed and updated. TfL will engage with the Council with regards to specific projects and schemes.	The Richmond IDP has been kept under review and was last updated in April 2017 (SD-021). The IDP is a living document and will be further reviewed and updated to take account of the emerging London Plan (anticipated to be published by the GLA later in autumn 2017), the Mayor’s Transport Strategy (which is currently out for public consultation until 2 October) and TfL’s Business Plans. In addition, IDP updates generally seek to reflect the latest positions on the borough’s infrastructure needs, service delivery changes as well as any changing needs of the borough due to growth and demographic changes.	No changes required	Agreed
Policy LP 45 Parking Standards and Servicing	London Plan policy notes that car parking standards are maximums and as such the word maximum should be added to bullet 1 in LP 45 as follows: 1. Requiring new development to provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points, in accordance with the maximum vehicle parking and minimum cycle parking standards set out in Appendix 3. Opportunities to	The Local Plan’s vehicle parking standards are intended to be maxima, as set out within paragraph 11.2.1 of LP 45. The Council expects these standards also to be adhered to as minima, unless it can be shown that proposed parking provision would not adversely affect the area. Therefore, flexibility will be allowed for by the Council on a case-by-case basis, subject to the location of the site, access to public transport, considerations of street scene, on-street parking conditions etc. It is therefore not considered necessary to specifically refer to standards being maxima within the main policy text.	N/A	Not agreed. Further information on both parties’ positions is set out in the relevant Statements for Hearing 7.


Section / Policy	Transport for London on behalf of the Mayor of London response	LBRuT response	Reason for Change	Common Ground Agreed?
	<p>minimise car parking through its shared use will be encouraged.</p>	<p>The cycle parking standards for all use classes, as set out within Appendix 3 of the Plan, are in accordance with the London Plan. Therefore, it is not considered necessary to add the additional text to the main policy.</p>		
<p>Policy LP 45 – Appendix 3 (Residential Parking Standards in PTALs 0-3)</p>	<p>Parking standards for new residential development in PTALs 0-3 are not compliant and not in general conformity with the London Plan as they do not seek to achieve the aims of London Plan around encouraging shifts away from the car in PTAL areas of 2 and above. A flexible approach to parking provision in PTAL 3 is not acceptable; limited flexibility in PTAL 2 would only be accepted under very specific circumstances which would need to be justified and agreed with TfL.</p>	<p>The Council notes that the Mayor appears to seek standards that are word for word the same as the London Plan. However, the test is one of ‘general conformity’ and it is considered that the Council’s standards provide a local variation, based on locally specific circumstances and justification, in line with paragraph 39 of the NPPF, rather than a significant change or deviation from the London Plan.</p>	<p>N/A</p>	<p>Not agreed. Further information on both parties’ positions is set out in the relevant Statements for Hearing 7.</p> <p>The Inspector should note that both parties agree that the Local Plan’s Parking standards set out in Appendix 3 for PTALs 0-1 are agreed to be in conformity with the London Plan.</p>
<p>Policy LP 45 – Appendix 3 (General/Special Industrial)</p>	<p>Appendix 3 should be amended to read <u>“Parking and servicing requirement to be demonstrated and provided off street (unless there is a sound planning reasons</u></p>	<p>The London Plan states that parking for commercial vehicles should be provided at a maximum standard of one space per 500sqm of gross B2 or B8 floorspace. The Local Plan sets out for ‘General/Special</p>	<p>N/A</p>	<p>Not agreed. Further information on both parties’ positions is set out</p>


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	for providing on street) in accordance with the London Plan”.	Industrial’ for parking and servicing to be provided off street but not below the London Plan maximum. The parking of commercial and visitor vehicles on the street is a regular source of congestion and complaint. Given the context and nature of this borough, the proposed local standard is considered to be appropriate. Flexibility will be allowed for by the Council on a case-by-case basis, subject to the location of the site, access to public transport, implications on carriageways etc.		in the relevant Statements for Hearing 7.
Policy LP 45 – Appendix 3 (Sports and Leisure Complexes)	Provision of coach parking should be as directed by the London Plan to reduce congestion and improve visitor safety.	The London Plan does not set out maximum standards for leisure uses. It states that “leisure, stadia and major exhibition venues should provide appropriate levels of coach parking to suit their individual demand to help reduce congestion and improve visitor safety.” The Local Plan sets out 1 space per 25sqm, with parking facilities for coaches, off street servicing and drop off area. Given the context and nature of this borough, the proposed local standard is considered to be appropriate. Flexibility will be allowed for by the Council on a case-by-case basis, subject to the location of the site, access to public transport, implications on carriageways etc.	N/A	Not agreed. Further information on both parties’ positions is set out in the relevant Statements for Hearing 7.
Policy LP 45 – Cycle parking	Compliant with the London Plan	Support noted	No changes required	Agreed
Policy LP 45 – Electric Vehicle Charging Points	Electric Vehicle Charging Points (EVCPs) and provision for Blue Badge parking at residential and non-residential development should be in	EVCPs are already in line with London Plan standards as set out in paragraph 11.2.5. The same applies to the disabled parking standards.	No changes required	Agreed

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	line with London Plan standards. Policy LP45 should be amended to state <u>“Electric vehicle charging points will be in accordance with London Plan standards.”</u>			
Policy LP 45 – Freight and Servicing	Supported and in line with Policy 6.14 of the London Plan.	Support noted	No changes required	Agreed
Policy LP 45 – Freight and Servicing	<p>In order to meet the Mayors aspirations for ‘Healthy Streets’, it is suggested to include the following:</p> <ul style="list-style-type: none"> • Providing unattended delivery facilities in residential developments; • Promoting the use of existing construction consolidation centres; • Exploring the range of consolidation options for new developments (ranging from click and collect, procurement led, physical consolidation centres, etc.); and • Noise mitigation to be incorporated into building design and delivery operations to facilitate out of hours delivery. 	Comments noted. It is considered more appropriate for the ‘Healthy Streets’ programme to be set out within the emerging London Plan and Mayor’s Transport Strategy.	No changes required	Agreed
SA 9 Richmond upon Thames College, SA 10	Ongoing collaboration is welcomed between the Council, TfL and third parties for A316 access and network	Comments noted	No changes required	Agreed

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The Stoop (Harlequins Rugby Football Club) and SA 11 (Twickenham Stadium)	impact. This includes TfL's significant junction improvement project at the A310 London Road roundabout. The A316 study referred to in earlier responses is applicable for any future development at the site, together with, servicing facilities and a visitor management plan.			
SA 21 Sainsbury's, Lower Richmond Road	Details of the level of development considered at this site should be provided to TfL given the proximity and impact to Manor Circus, where a significant junction improvement project is being developed.	Comments noted. The Council will work with TfL as and when a proposal for development comes forward for this site.	No changes required	Agreed
SA 24 Stag Brewery	Ongoing collaboration with TfL is welcomed for A316 and A205 access and network impact in order to assess the impact and agree mitigation measures through development.	Comments noted	No changes required	Agreed
SA 27 Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen	Details of the level of development being considered at this site should be provided to TfL given the proximity and impact to the A205 Sheen junction, where a significant junction and street improvement project is being developed.	Comments noted. The Council will work with TfL as and when a proposal for development comes forward for this site.	No changes required	Agreed

Both parties consider that these amendments address the concerns raised by Transport for London on behalf of the Mayor of London in their representations and their written statements on the **London Borough of Richmond upon Thames – Local Plan Examination 2017**

Signed on Behalf of the London Borough of Richmond upon Thames		
Name and Position	Signature	Date
Andrea Kitzberger-Smith Planning Policy and Design Team Manager London Borough of Richmond upon Thames		08 September 2017

Signed on Behalf of the Mayor of London		
Name and Position	Signature	Date
Andrew Dorrian Principal Planner Transport for London		08 September 2017