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## Inspectors Report on UDP Published

Some 18 months ago, members of the BBRAG Executive Committee spent a lot of time submitting representations to the Inspector appointed to review the council's Unitary Development Plan (UDP). This laid down many land development policies that will affect such matters as the transport network for many years to come, so it was an important document. The draft prepared by council staff contained many defects in our view, with the usual over-emphasis on public transport and adherence to dogmatic policies that do not reflect local conditions. The results of our submissions are given below:

1. We asked that as well as seeking improvements to public transport, that traffic congestion and air pollution also be tackled by improvements to the road network. The answer was:

*"The commitment to expanding or improving the road network as a solution to traffic congestion would not reflect Government advice and would run counter to the general emphasis on encouraging other forms of transport and reducing the need to travel."*

2. We also suggested that the use of parking policies to artificially limit demand was short sighted, would not achieve its objectives and was not laid down by any national policy. The answer was:

*"There is a general concern that LBB's policies of restraining and inhibiting transport demand, rather than improving transport capacity, do not take account of the Borough's particular circumstances. While displaying problems similar to other London Boroughs, it is said that there are also clear differences that justify flexible policies. Objectors maintain that the Council should not seek to inhibit travel by car or impose limitation on parking, as such an approach would lead to a further decline in local employment, shopping and leisure opportunities that are already subject to increasing competition from car-dependent developments outside the Borough."*

*In my view, the objectives are correctly reflecting the thrust of national and London-wide policies that seek to encourage modes of transport other than the private car. This is essentially and fundamentally the right approach, even for Bromley with its characteristics of affluence and high car ownership. Focussing developments to areas where modal shift is achievable is just one of a number of measures used to reduce car dependence. This type of locational policy is workable only where transport provision is in place or likely to be in place. Detailed policies will ensure that developments take account of existing conditions and allow for improvements where appropriate. I agree that car restraint is not specifically mentioned in either PPG13 or the London Plan. What is more, level of car use cannot be controlled through planning policies. To reflect the link between land use planning and transport policies, I suggest that the objective should instead seek to create the right conditions to encourage the modal shift intended."*

3. We objected to the inclusion of a shortened restatement of PPG13 that suggested parking policies alone could be used to "promote sustainable transport choices and reduce reliance on the car". The Inspector agreed that it should be reworded to reflect the full PPG13 wording in the form "Parking policies are used alongside other packages of measures to promote sustainable transport choices and reduce reliance on the car.". This is a small but important victory.

4. We objected to Transport Policy T3 in relation to off-street parking standards. The Inspector has reworded the policy to allow more flexibility in respect of town centre parking for retail and leisure developments.

5. We objected to Policies T4, T5 and T6 which related to "On-Street Parking Controls" and "Commuter and Town Centre Parking". The Inspector has requested these be removed altogether as not relevant to planning and spatial development. She also suggested they are best covered in the LIP document (*Editor's Comment: Well she nicely ducked those issues*).

*Editor's Summary: Well we achieved some minor victories in this process, but of course it is well worth noting that the Inspector made absolutely clear Government policy when it is rarely made apparent to the public. In essence this policy is that the Government does not believe in improving the road network. In fact the only solution the Government has is to make life more difficult for the motorist by reducing parking standards, spending your taxes on public transport provision and even simply advising you not to travel.*

Roger Lawson, B.B.R.A.G., 16/4/2005