

# Minor Alterations to the London Plan: Parking Standards

## Sustrans' submission to the Greater London Authority

June 2015

### About Sustrans

Sustrans is a leading UK charity enabling people to travel by foot, bike or public transport for more of the journeys we make every day. We work with families, communities, policy-makers and partner organisations so that people are able to choose healthier, cleaner and cheaper journeys, with better places and spaces to move through and live in.

## 1. Summary

Sustrans objects to the proposed changes to Policy 6.13C and E(e) and to the accompanying text and Table 6.2 for the following reasons:

- 1.1 The proposed new policy wording and accompanying text are in conflict with the requirement for good integrated transport and land use planning manifested in the London Plan 2015 and in national policy, and are contrary to the wider sustainability and health objectives set out therein. The active promotion of more generous car parking standards for new housing in outer London areas with low PTALs would be a retrograde step, reminiscent of the now discredited and unsustainable 'predict and provide' approach because it would:
  - (a) promote the use of the private car;
  - (b) discourage walking and cycling and the use of public transport;
  - (c) fail to take account of significant new cycling infrastructure to be delivered over the period of the London Plan including in outer London boroughs;
  - (d) not reflect the future growth and development of alternative demand management measures in outer London areas over the period of the London Plan to 2036; and
  - (e) have a significant negative impact on the environment and health and wellbeing.
- 1.2 The active promotion of higher car parking standards for new housing developments would fail to make the best use of scarce development land in outer London and act as a disincentive to invest in active travel and public transport modes in those areas.
- 1.3 The proposed new policy wording is too generalised and overly simplistic, with reliance solely upon the PTAL tool to assess whether higher car parking standards should be actively promoted by outer London boroughs.
- 1.4 The proposed new wording is unnecessary as the London Plan 2015 already provides flexibility in the provision of more generous car parking for new residential developments in certain circumstances.

1.5 We set out below a summary of our objections with regard to the MALP (car parking standards).

<b>MALP change (car parking)</b>	<b>Policy/Text</b>	<b>Sustrans' position</b>
Policy 6.13 Parking – Planning decisions	Policy 6.13C	No change
Policy 6.13 Parking – LDF preparation	Policy 6.13E(e)	No change
Text accompanying Policy 6.13	Paragraphs: 6.42i, 6.42j, 6.42k	No change
Table 6.2 Car parking standards	Proposed text relating to outer London areas & higher levels of car parking provision <sup>1</sup>	No change

1.6 Sustrans also disagrees strongly with the sustainability appraisal of the proposed changes and the conclusions set out in section 4 of the Integrated Impact Assessment report (IIA), which has been published alongside the proposed alterations.

## **2. The proposed changes are contrary to sustainable integrated transport and land use planning policy objectives**

2.1. Transport planning in the UK has for many years sought to promote sustainability through integrated transport policies. The concept of sustainable development - and how the planning system can contribute to the achievement of such development - is central to the National Planning Policy Framework (NPPF). The NPPF acknowledges the important role that transport policies play in facilitating sustainable development and in contributing to wider sustainability and health objectives.<sup>2</sup> In the London Plan, the Mayor requires London Boroughs to impose local parking standards for new residential development because there is a clear and compelling justification that this is necessary to manage the road network; this is in conformity with the March 2015 addendum to the NPPF. Against this background, neither the NPPF nor the March 2015 addendum require local authorities *to promote* higher car parking standards for housing in areas of low public transport accessibility; national policy is more nuanced, with paragraph 39 providing a range of factors for local authorities to take into account if they are setting local parking standards.

2.2. The very well established policy objectives in respect of integrated transport and land use planning, air quality and health are set out in the strategic policy approach in Policy 6.1 of the London Plan 2015 (London Plan) and accompanying text. Inherent within Policy 6.1 is the close integration of transport and development by encouraging patterns and nodes of development that reduce the need to travel, “especially by car”; in this regard, specific reference is made to the use of the standards set out in Table 6.2 of the Parking Addendum.

2.3. In seeking actively to promote more generous car parking standards for new housing in certain circumstances, the proposed new policy 6.13 wording is a retrograde step, reminiscent of the now discredited and unsustainable ‘predict and provide’ approach which would fail to achieve good integrated transport and land use planning over the period to 2036. On the contrary, the proposed new policy wording would actively promote the use of

<sup>1</sup> For the avoidance of doubt, Sustrans does not object to the inclusion of the words “in all parts of London”.

<sup>2</sup> NPPF para. 29.

the private car and encourage the development of car dependent suburbs in outer London, as is evidenced from the following:

- (1) TFL research indicates that households living in developments with up to 0.5 parking spaces per unit are significantly *less* likely to own a car than those living in developments with more than 0.5 spaces per unit.<sup>3</sup> Furthermore, TfL's research indicates that if people have access to a car, they are more likely to use it;<sup>4</sup>
- (2) the Mayor himself has confirmed that "evidence from TfL shows a clear link between car ownership and use";<sup>5</sup>
- (3) the Outer London Commission (OLC) accepts that, in general, developments with more parking provision have higher levels of car ownership and more car journeys than in those with less parking and that this is supported by research carried out by TfL and others.<sup>6</sup> The OLC also accepts<sup>7</sup> that the provision of more than 0.5 spaces per unit affects car use significantly and particularly for those who use their car more than 5 times a week (ie residents of outer London<sup>8</sup>).
- (4) the Berkeley Homes 2011 study, available online, (which sought to suggest that an increase in car parking provision would not necessarily lead to an increase in car usage) has been undermined by other research<sup>9</sup> and heavily criticised by a number of bodies, including TfL and the Campaign for Better Transport.<sup>10</sup> We concur with the criticism of the 2011 study that it excluded a significant number of trips by focusing solely on peak hour trips. We have not been able to comment upon the 2014 update, which is not available online, and so we reserve our position in this respect.

2.4. The new policy wording also runs counter to the following considerations:

- (1) cycling has grown strongly in London in recent years, with cycle trips (as main mode) increasing by 53.9% between 2003-2013;<sup>11</sup>
- (2) the Mayor is committed to delivering a step change in cycle provision, as manifested in the policies of the London Plan, and encouraging growth in cycling across all of London to increase the mode share for cycling to 5%;<sup>12</sup>
- (3) significant new cycle infrastructure provision is proposed - including in outer London boroughs - which will be delivered during the period of the London Plan;
- (4) 'Mini-Hollands' in three outer London boroughs will be created to deliver "transformational change" and provide exemplar facilities for cyclists;<sup>13</sup> and

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<sup>3</sup>(Outer London Commission Fourth Report (Part One) (OLC4), p23. See also TfL (2012) Residential Parking Provision in New Developments: Travel in London Research Report.

<sup>4</sup> See OLC4, Fig 6, & para. 4.1.14, p24.

<sup>5</sup> Mayor response to DCLG Technical consultation on planning 2014 p33-36.

[https://www.london.gov.uk/sites/default/files/Mayor%27s%20response%20form%20DCLG%20Technical%20Consultation%20on%20Planning%20250914\\_0.pdf](https://www.london.gov.uk/sites/default/files/Mayor%27s%20response%20form%20DCLG%20Technical%20Consultation%20on%20Planning%20250914_0.pdf)

<sup>6</sup> "In general, developments with more parking provision have higher levels of car ownership and consequently more car journeys than in those with less parking; conclusions which are echoed in other research and literature." (Outer London Commission Fourth Report (Part One) (OLC4), para. 4.1.15, p26).

<sup>7</sup> OLC4, Figs 6&7, p25.

<sup>8</sup> Data from TfL shows that cars owned by residents of outer London are more likely to be used 5 times a week or more than those owned by inner London residents (OLC4, 4.1.13, p24).

<sup>9</sup> The Roads Task Force Technical Report 14.

<sup>10</sup> Written Statement from Campaign for Better Transport for the FALP Examination in Public, August 2014.

<sup>11</sup> TfL Travel in London report 7 (2014), p22.

<sup>12</sup> London Plan 2015, para. 6.33.

<sup>13</sup> Page 237 of the London Plan 2015.

- (5) research<sup>14</sup> indicates that the greatest unmet potential for growth in cycling trips can be found within outer London, with more than half of potentially cyclable<sup>15</sup> trips located in outer London.<sup>16</sup>
- 2.5. Furthermore, the proposed new policy wording and accompanying text do not take account of the future growth and development of alternative demand management measures in outer London areas over the period of the London Plan. Demand management mechanisms, such as car clubs, can make a real and tangible difference in managing the demand for parking: research by TfL shows that almost a fifth of members sell a car either immediately before or after joining a car club.<sup>17</sup> The planning process can encourage the promotion of further car club uptake and account should be taken of such measures, given that the period of the London Plan extends to 2036. A recent report (May 2015) of the Car Club Coalition<sup>18</sup> concluded that London already has one of the largest car club markets in Europe; that the sector is innovating rapidly; and that there is considerable potential for growth of car clubs in outer London boroughs.<sup>19</sup>
- 2.6. Active travel is the main way that adults in London stay physically active.<sup>20</sup> The relationship between car ownership and how much walking and cycling Londoners do is reflected in the latest Travel in London report 7, with residents of households owning more cars less likely to meet the recommended level of physical activity. This report also shows people in outer London are less likely to meet their activity targets than inner London residents.<sup>21</sup> The significant relaxation of car parking policy and increased car use in outer London boroughs would discourage active travel and reduce the potential for physical activity to be undertaken, which in turn could be harmful to people's overall health. Furthermore, TfL consider that the negative health impacts of car use are felt most by the more vulnerable in society leading to widening health inequalities.<sup>22</sup>
- 2.7. Air quality is a major issue for a number of outer London boroughs, and Air Quality Management Areas have been designated in a significant number of outer London boroughs.<sup>23</sup> The increase in car use and likely increase in congestion that would follow from the relaxation of car parking standards for new residential development that is proposed would exacerbate the already serious situation in this regard.
- 2.8. It is clear from the above that we strongly disagree with the sustainability appraisal of the proposed changes and the conclusions set out in section 4 of the IIA. In our judgement, the adverse impacts associated with the new policy wording and accompanying text will be greater than those described; there will be no positive impacts in the manner suggested. Even on this IIA assessment, however, negative effects are identified in respect of 50% of the Sustainability Objectives for the "preferred option" (PTALs 0-1) including in respect of mobility and accessibility; air quality; and health and wellbeing.
- 2.9. We note that greater car parking flexibility in PTAL2 locations is not included within the "preferred option" as described in the IIA. If the 'preferred option' extends to PTAL 2 – which is what is actually being proposed in the MALP – then the number of negative impacts and the significance of those adverse impacts will inevitably increase. It is unfortunate that there

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<sup>14</sup> TfL's Analysis of Cycling Potential; Policy Analysis Research Report 2010.

<sup>15</sup> These are trip currently made by London residents using mechanised modes which could reasonably be cycled all the way (based on the characteristics of the majority of trips currently made by bike, as applied by a series of 'filters') but are not cycled at present – see Chapter 1 of the Report.

<sup>16</sup> 54% of potentially cyclable trips and only 5% of the total potential in outer London actually cycled.

<sup>17</sup> OLC4, para. 4.6.2.

<sup>18</sup> Representing car club operators, London Councils, the GLA, TfL and key stakeholders.

<sup>19</sup> 'A Car Club Strategy for London. Growing car clubs to support London's transport future.'

<sup>20</sup> OLC4, 4.2.15, p30.

<sup>21</sup> (OLC4,4.2.15, p31).

<sup>22</sup> (OLC4, 4.2.16).

<sup>23</sup> Source: DEFRA.

has been no specific assessment in the IIA of the cumulative impact of greater car parking flexibility in PTAL 0-2 locations, given that this is what is actually proposed by the MALP.

### **3. The proposed changes would amount to an inefficient use of scarce development land**

- 3.1. Reference is made in the proposed new policy wording to the promotion of more generous car parking standards for housing “in areas with low public transport accessibility (generally PTALs 0-1) ...” This leaves open the possibility, as suggested in the proposed new accompanying text (para.6.42j) that in outer London a more flexible approach may also be acceptable in PTAL 2 locations. Given that the majority of outer London is covered by PTAL 0-2,<sup>24</sup> the relaxation of car parking policy contained in the proposed new policy wording could potentially affect a very significant area of London - where there is considerable potential housing capacity.
- 3.2. The OLC accepts that increasing parking provision will have an impact on the density of development that can be achieved on a site in London.<sup>25</sup> This will have a greater impact in outer London where car parking provision is likely to be surface level (rather than underground). A number of outer London boroughs expressed a concern to the OLC that housing delivery could be reduced due to space being given over the car parking and an example was given of a developer in Newham reducing densities in response to the Council’s request for increased parking provision.<sup>26</sup>
- 3.3. Given that “London desperately needs more homes” and the stated importance of delivering a high proportion of new residential development over the period to 2036, as recognised both in the London Plan and nationally, we suggest that the land take associated with additional parking provision for new housing would have a significant adverse impact on the delivery of the quantum of new housing required. The active promotion of higher car parking standards for new housing developments would fail to make the best use of scarce and much needed development land.
- 3.4. Furthermore, the OLC also accepts that “more generally, lower density developments are less able to support public transport provision, provide less encouragement for walking and cycling, and are less able to support neighbourhood amenities such as small shops within walking distance that can substitute for driving.”<sup>27</sup> Lower density development and a greater reliance upon the private car would lead to a disincentive to invest in public transport and active travel modes, increase car dependence and reduce the ability to support local services.

### **4. PTALs should not be the only tool to determine whether higher car parking standards should be promoted by outer London boroughs.**

- 4.1. The effect of the MALP is that all outer London boroughs would be required to promote higher car parking standards for new housing development in areas with low public transport accessibility and could set these higher car parking standards as a minimum. Yet the Public Transport Accessibility (PTAL) tool has limitations, as acknowledged by developers, boroughs

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<sup>24</sup> OLC4, Fig 2, p16.

<sup>25</sup> Although it considered that the significance of that impact was less clear: OLC4, 4,4,1, p35.

<sup>26</sup> OLC4, para. 4.4.18.

<sup>27</sup> OLC4, para. 4.4.2, p35.

and other stakeholders<sup>28</sup> and it only measures broad public transport accessibility levels. It does not take walking and cycling infrastructure (either existing or proposed) into account, for example. TfL itself recommends (as acknowledged in the London Plan<sup>29</sup>) that an assessment which combines both PTAL and ATOS<sup>30</sup> is desirable at a neighbourhood level in order to better understand what services are accessible in a local catchment area, by both walking and cycling. In this regard, we note from the NPPF that neighbourhood plans must be in general conformity with the strategic policies of local plans.<sup>31</sup>

- 4.2. PTALs may be refined by TfL in the future<sup>32</sup>, but there is no firm commitment in this respect and this gives further credence to the argument that PTALs should not be the only tool referred to (in Policy 6.13) in the context of promoting more generous car parking standards for new housing.
- 4.3. The proposed new Policy wording precludes a more refined and nuanced assessment of accessibility to the opportunities and services most relevant to the daily lives of Londoners. An assessment of accessibility should be made taking account of alternative active travel modes, including targets and future proposals for walking and cycling provision. Other considerations could include the potential for neighbouring developments sharing parking spaces, for example at different times of day or week.
- 4.4. Given that PTALs have such limitations, they should not be the only factor in determining when the significant relaxation of car parking standards should be invoked by all outer London boroughs. This is an overly simplistic approach which fails to recognise that other tools, such as ATOS could play a useful role in this respect and help to provide a more balanced and nuanced context, consistent with paragraph 39 of the NPPF.

## **5. The proposed changes are unnecessary: the London Plan 2015 already strikes a balance and provides flexibility in outer London boroughs**

- 5.1. It is clear from paragraph 6.42 of the London Plan that the car parking standards for new residential development are not intended to be applied in a mechanistic, one size fits all way. It refers to “a flexible approach to identifying appropriate levels of car parking provision across boundaries. This means ensuring a level of accessibility by private car consistent with the overall balance of the transport system at the local level.” Annex 3 of the Housing SPG 2012 (Car Parking Provision Guidance) reinforces this.
- 5.2. Furthermore, Table 6.2 of the London Plan already distinguishes between different PTAL levels when applying the car parking standards for new residential development; it therefore already reflects flexibility with regard to areas of lower public transport accessibility.
- 5.3. A number of outer London boroughs consider that the London Plan already provides sufficient flexibility to address different circumstances within outer London.<sup>33</sup> The Inspector considering the FALP in 2014 was also of this view.<sup>34</sup>
- 5.4. Indeed, the maximum car parking standards set out in the London Plan have been exceeded, as the evidence shows. An example is the Cane Hill development in Coulsdon,

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<sup>28</sup> OLC4, para.3.4.3, p16.

<sup>29</sup> Paragraph 6.43 of the London Plan.

<sup>30</sup> Access to opportunities and services.

<sup>31</sup> Para. 184 of the NPPF.

<sup>32</sup> Para. 6.43 of the London Plan 2015.

<sup>33</sup> OLC4, 3.1.2, p12.

<sup>34</sup> Para. 92 of the FALP Inspector’s Report, November 2014. “The Further Alterations...will allow London Boroughs to tailor standards to their areas as appropriate. Consequently, I find that the FALP is flexible and strikes the appropriate balance.”

Croydon, when planning permission was granted in 2014 for approximately 2.5 spaces per unit due to the relative inaccessibility of the development to public transport and amenities.<sup>35</sup> Indeed, the OLC concluded that 22% of schemes in outer London were not compliant with the current Local Plan standards in that they exceeded them<sup>36</sup> - this is a significant proportion of schemes.

- 5.5. Furthermore, LB Bromley has set out more lenient standards in its emerging Local Plan. It is LB Bromley's view, as set out in the draft Policies and Designations Document (February 2014), that "The [London] Plan acknowledges the need for a flexible approach to car parking provision ensuring a level of accessibility by private car consistent with the overall balance of the transport system at a local level....Local flexibility can therefore be achieved with the application of the parking standards in tandem with other policies of the London Plan." (p80). In this draft document, parking standards for new residential development are expressed as a "minimum" and exceed the maximum standard for 1-2 bedroom units set out in the London Plan.<sup>37</sup>
- 5.6. The OLC acknowledges that certain outer London boroughs do not consider the London Plan to be sufficiently flexible. Given that a significant number of schemes which exceed the existing standards are currently being permitted in outer London, however, it is our view that this concern – if valid - is better addressed through existing and/or further supplementary planning guidance, rather than a change to the wording of the policy itself; in requiring *all* outer London boroughs actively to promote higher car parking standards in low PTAL areas, the proposed alterations are akin to 'using a sledgehammer to crack a nut'.

## 6. Conclusions

- 6.1. It is clear from the above that Sustrans strongly objects to the proposed changes set out in the MALP on car parking. There is no justification for any change to be made to Policy 6.13C, E(e), the accompanying text or Table 6.2. We also strongly disagree with the conclusions set out in the IIA published alongside the MALP.
- 6.2. Finally, we would like to highlight the fact that the Outer London Commission did not recommend the use of the word "promote" in any new policy wording associated with the application of more generous car parking standards by outer London boroughs. Sustrans particularly objects to the use of this word in the proposed policy changes, for the reasons given above.

## Contact Details

Joanna Clayton - Planning, Consents & Legal Officer  
Sustrans  
70 Cowcross Street  
London  
EC1M 6EJ

Tel: 020 7017 2350

Email: [policy.submissions@sustrans.org.uk](mailto:policy.submissions@sustrans.org.uk)

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VAT Registration No. 416740656

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<sup>35</sup> See OLC4, 3.1.2,p13.

<sup>36</sup> OLC4, para.3.1.2, p13.

<sup>37</sup> 1-2 bedrooms "1 space".