



HILLINGDON

LONDON

Boris Johnson
Mayor of London
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22nd June 2015

Dear Mr Johnson

DRAFT MINOR ALTERATIONS TO THE LONDON PLAN - HOUSING AND PARKING STANDARDS

Thank you for the opportunity to comment on the Draft Minor Alterations to the London Plan Housing and Parking Standards, which were issued for consultation on 8th May 2015. The Council welcomes the opportunity to respond to these proposed changes. Officer comments on each of the consultation documents are set out below.

Minor Alterations to Parking Standards

The Council is aware that the proposed revisions to parking standards have been informed by the recent review undertaken by the Outer London Commission. Officers attended the workshop session held at Brent Council on 3rd March 2015 and are disappointed that the reference to maximum standards has been retained in the Plan.

Three options were put forward for discussion at the workshop event and Hillingdon stated a clear preference for policy option 2, which was set out in the TfL presentation as follows:

- *Deletes reference to maximum residential standards.*
- *Policy provides for more generous approach for residential standards in PTALs 0-1 based on separate criteria derived from those already used for offices*

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INVESTOR IN PEOPLE

- *Supporting text says LBs 'should' consider more generous standards in PTAL 0 -1, and provides scope for application in parts of Outer PTAL 2. Focuses on suburban areas and family housing where on street parking is a particular problem.*

This policy approach was supported on the basis that maximum standards are unlikely to affect car ownership in Hillingdon. Residents have complex travel patterns and require access to a range of destinations, both within and outside of London, that are not adequately served by the public transport network. In many cases, families require access to more than one car to meet these needs. It is not considered that enforcing maximum parking standards is an effective way of addressing traffic congestion or controlling off street parking.

Officers are aware that a range of different views were expressed at the OLC workshop sessions and that some boroughs supported the retention of maximum standards. The Brent workshop highlighted the differences that exist between outer London boroughs and the range of factors that inform views on parking standards. Hillingdon is located on the edge of London and has very different characteristics and transport requirements to a borough such as Brent, which is located adjacent to inner London and the central activities zone. Officers note that these differences were also highlighted in Croydon workshop on 10th March 2015. The minutes from this session state:

'One of the boroughs said that Outer London wasn't homogenous – many places in the borough don't have access to the tube which has significant implications for development. They questioned the ability of one policy to adequately address all of outer London. They agreed with a suggestion put forward that maximum standards were toxic and unnecessarily restrictive in some cases. Local authorities need flexibility to make decisions. There are a whole range of other factors that influence parking – differences between how CPZ operate, etc. Need flexibility otherwise like saying localism goes out of the window.'

Parking standards should be guided by factors such as local character and circumstances, the type of housing being provided and access to a range of public transport opportunities that meet the requirements of residents. Proposed new paragraphs 6.42i - 6.42k, state that in outer London a more flexible approach for applications may be acceptable in some limited parts of areas within PTAL 2, in locations where the orientation or levels of public transport mean that development is particularly dependant on car travel. Whilst the spirit of this guidance is welcomed, the reference to 'parts of areas' is a little unclear. Furthermore, the need to refer both the Housing SPG and forthcoming TfL guidance for 'further advice' is unhelpful.

Officers continue to be of the view that in order to provide boroughs with maximum flexibility to address the needs of residents and the transportation issues that are specific to their area, reference to maximum standards should be deleted.

Minor Alterations to Housing Standards

The majority of proposed changes to housing standards in the London Plan have been made to incorporate new national standards and guidance. Officers generally support these changes, particularly the increases in the minimum space standards for new development.

Hillingdon would like to reserve the right to attend the public examination associated with the implementation of these minor alterations.

Should you have any queries regarding the nature of this response please do not hesitate to contact me on directly on 01895 558275 or by email at jgleave@hillingdon.gov.uk.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J. Gleave', written in a cursive style.

James Gleave
Planning Policy Manager
Residents Services