



**By email only**

Boris Johnson, Mayor of London  
Borough of Hounslow MALP (Housing  
and Parking standards)  
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Dear Mr Johnson

**Re: Housing Standards and Parking Standards MALP**

Thank you for consulting the authority on these two proposed minor alterations to the London Plan.

**Housing Standards**

The LB Hounslow fully support the intention and content of the proposed alterations to the Policies 3.5, 3.8, 5.2, 5.3, 5.15 and 7.1 and supporting justification and annex.

**Parking Standards**

The view of the Government is that more parking spaces should be provided alongside new homes that families want and need, especially in areas of low public transport accessibility; and that even in urban areas, insufficient spaces, which may be caused by maximum parking standards among other reasons risk a vicious cycle of clogged up streets leaving motorists running the gauntlet of congestion, unfair fines and parking restrictions.

LBH has concerns about the proposals, and does not support any changes to the current policy for urban areas although is supportive in principle of changes to parking standards in those areas of outer London with the worst PTALs subject to an assessment of transport impacts.

The Mayor recognises the need for flexibility in parts of outer London especially where public transport accessibility levels are lower and as such the following changes are proposed to Policy 6.13 of the London Plan.

6.13C. standards set out in the Parking Addendum remain the basis for considering planning applications but informed by policy and guidance as set out in the London Plan. This only refers to housing in parts of outer London with low public transport accessibility (generally 0-1).

6.13Ee. States that outer London boroughs should promote more generous standards for housing development in areas with low public transport accessibility (generally PTALs 0-1) and take into account current and projected pressures for on-street parking (ie. PARKING SURVEYS) and their bearing on all road users as well as the criteria set out in the NPPF (Para 39).

6.42i States that in setting residential parking standards (LBH does not intend setting its own parking standards) outer London authorities should take account of residents' dependency on the car in areas with low public transport accessibility (generally PTALs 0-1) (LBH DOES THIS ANYWAY IN ASSESSING PLANNING APPLICATIONS). Where appropriate in these locations boroughs should consider revised standards (which could include minima) and permitting higher levels of provision there than is indicated in Table 6.2 particularly to avoid generating unacceptable pressure for on-street parking (THIS WILL BE FLAGGED UP IN PARKING SURVEYS).

6.42j States that a more flexible approach may be acceptable in some areas within PTAL 2 in locations where the orientation or levels of public transport accessibility mean that a development is particularly dependent on car travel. Further guidance is to be provided in the Housing SPG and TfL guidance on parking design (LBH DOES NOT AGREE WITH THIS APPROACH AND ISSUES SUCH AS CAR OWNERSHIP LEVELS, TRAFFIC IMPACT, CONGESTION, ETC MUST BE CONSIDERED).

6.42k States that in deciding whether more generous standards are to be applied account should be taken of the extent to which public transport might be extended in the future. Consideration should also be given to the impact of on-street parking measures such as CPZs which may also help to reduce the potential for overspill parking and congestion and improve safety and amenity.

## **LBH Response**

LBH is not planning to set its own parking standards, but will rely on those set out in the London Plan which are considered to be appropriate.

LBH agrees with the Mayor that allowing/encouraging flexibility in more PTAL areas is not appropriate. In particular, KBH agrees that it is not appropriate in urban areas with PTALs above 0-1.

LBH believes that the criteria set out in supporting paragraph 6.42k of Policy 6.13 should be the most important indicators of whether higher parking provision could be appropriate. LBH recommends that the use of "should" in that paragraph be changed to "must" to highlight the importance of these issues, and the benefits that they can make in reducing congestion, improving air quality, etc.

Equally, LBH believes that the proposed changes to Policy 6.13Ee should also remove the word "should" and replace it with "could" (ie. "outer London boroughs could..."). Use of the word "should" implies that the promotion of more generous car parking provision is appropriate in all areas with a PTAL of 0-1, whereas there might be other factors which mean it may not be appropriate in all cases.

Policy EC2 of the council's draft Hounslow Local Plan sets out the council's policy and bullet point 3 of paragraph 10.4 makes specific reference to how the council uses parking and traffic management to manage congestion, parking demand and pollution.

There are a number of areas that would need to form part of an assessment of whether increased parking could be appropriate. These include:

- Relationship to local levels of car ownership
- Relationship to levels of congestion
- Relationship to transport impacts of a development
- Impact on pollution and air quality
- The need to consider and prioritise improvements to PTAL

and should be included in a Transport Assessment or Transport Statement in support of a planning application. Provision of increased car parking should be a last resort to mitigate impacts that cannot be resolved in another way.

It should be made clear that increased levels of car parking should not be considered in viability assessments. Developers often use the provision of high levels of car parking in determining the viability of a development, specifically in relation to the ability to sell a property. The London Plan should make this clear and state that the only reason for allowing higher levels of parking would be because no other options are available to mitigate the transport impacts of a development.

The Integrated Impact Assessment sets out a number of sustainability objectives and guide questions in Table 3.1. LBH considers that there are a number of guide questions (particularly in Sustainability Objectives 9, 12, and 16) that are relevant in considering the impacts of increased parking provision.

LBH generally agrees that the conclusions are correct.

## Conclusion

LBH is concerned about the negative impacts of even the preferred option and believes that if this is pursued then it should only be allowed if a full assessment of the traffic/transport impacts has been undertaken and shows a need for additional parking.

LBH also does not believe that outer London locations should promote more generous parking provision in all locations with low PTALs. The proposed wording should be amended to say that this could be promoted in some cases but subject to a full assessment of transport needs and impacts that conclude additional parking is required to mitigate the impacts of a development.

Developers often use viability as a reason for promoting higher levels of parking than may be needed or required by future residents. LBH does not believe that viability should be used as an argument for providing additional parking if this change is approved.

LBH would not support the changes if they were to apply to areas with a PTAL higher than 1.

If these points are made clear then LBH would support the preferred option of allowing.

6.13Ee should be amended to read “Outer London boroughs could...”.

6.42i should not refer to minimum standards.

6.42j LBH does not agree with the inclusion of areas with PTAL 2.

6.42k should be strengthened in terms of the assessment required, and should also be clear that viability should not be used as a reason to promote more generous parking provision.

Yours faithfully

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For London Borough of Hounslow