

Jinder Ubhi

From: Gino Seguna
Sent: 22 June 2015 13:39
To: Jinder Ubhi
Cc: Julie Hill
Subject: FW: Housing Standards and Parking Standards MALP

From: Vinall, Alan [mailto:AVinall@lambeth.gov.uk]
Sent: 22 June 2015 13:25
To: Mayor
Cc: Pinamonti-Hyde, Ian; Trevethan, Mark; Joyce, David; Rodgers, Vanessa; Williamson, Kirsten; Carpenter, Catherine; Vyas, Vishnu
Subject: Housing Standards and Parking Standards MALP

Dear Sirs,

Thank you for giving us the opportunity to comment on the Minor Alterations to the London Plan (MALP).

The council supports the [Housing Standards Minor Alterations](#) given that it is not possible to set requirements above the new national standards. The draft Minor Alterations reflect the highest level of compliance possible noting that for the most part they echo the existing London Plan policies.

Regarding the [Parking Standards Minor Alterations](#), our understanding is that they will not apply to Lambeth as it is an Inner London Borough.

Nevertheless, the council does have some general comments to make:

- In principle it does feel a retrograde step to be considering revising the maximum parking approach, given the progress that has been made in recent years in promoting sustainable transport, the increases in cycling (albeit variable Borough by Borough) and the investment/improvements in public transport services. There is also the air quality implications, though it may be that the mobility-impaired may well support this. The council does appreciate, however, that this change is as a result of central government policy.
- The Alterations are probably fairly limited in terms of the actual areas they will be applicable in - but it would be useful if Outer London Borough Plans were to show the PTAL areas to be produced.
- It is reassuring that the PTAL level won't be the only consideration in determining parking provision – demand management measures will need to be actively considered, and local car ownership levels as well. It is also noted that local Network Management issues should be part of the consideration as well, i.e. where additional on street parking resulting from a development proposal could compound existing highway or road safety issues. All of these issues can be taken on board in the overall consideration of parking provision for a given site. It was suggested at one of the City Hall consultation briefings that some evidence base/mapping for 'problem' parts of the network should be compiled.
- It is good to note that future public transport service provision also needs to be part of the overall consideration. Boroughs will of course need to be fully conversant on what these may well be over time. Again, at one of the City Hall consultation meetings there was a comment from TfL that the PTAL website will introduce an option for future year accessibility that reflects future Public Transport service enhancements resulting from investment.
- Considering the impacts, it is noted that there are no dramatic effects/impacts from the proposal highlighted in the accompanying Integrated Impact Assessment. The council recognises that there are

advantages for mobility and access to jobs for some parts of the population, and there are some potential advantages for developers in terms of the viability of sites. There are however negative impacts for environmental and sustainability considerations.

- The reference to 'promoting generous parking' in Policy 6.13 E (e) is an inappropriate statement and should be deleted.
- Allocation of parking – this can sometimes be an issue where spaces are unused resulting in greater on street demands/pressures. It should be a consideration at the planning stages as to what will be appropriate for this bearing in mind potential on-street impacts.
- As a general note, use of car clubs, higher cycle provision and the encouragement of large scale development near areas of good public transport accessibility can help reduce car parking provision.
- Air Quality can be protected by ensuring that, wherever appropriate, there is a Travel Plan or Transport Assessment provided to mitigate the impact of higher car use with more sustainable modes of transport.
- Finally, with regard to the considerations in paragraph 6.42 these seem sensible as there can be occasions when developers propose a car free development which can cause issues with additional parking stresses on site. Having issues such as network management and future public transport provision referred to as considerations in the parking standards can prove helpful to local authorities.

I trust you will take into account the comments made.

Can you please confirm receipt of this email.

Kind regards,

Alan

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