

Growth and Regeneration

Acting Director Regeneration and Growth
Lucy Shomali



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Ask for: Planning Policy
Our Ref: MALP
Your Ref:
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Direct line: 0208 496 3000
Date: 19/06/2015

Dear Mr Johnson,

Re: Minor Alterations to the London Plan 2015 – Housing Standards and Parking Standards

London Borough of Waltham Forest welcomes the opportunity to comment on the draft Minor Alterations to the London Plan. Please see the attached schedules which set out our comments.

Yours sincerely

David Scourfield

Acting Assistant Director, Planning



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Summary

Housing

Minimum Ceiling Heights

Waltham Forest believes that there should be a more strongly worded support for ceiling height standards which “require” rather than merely “strongly encourage” minimum ceiling heights of 2.5 metres. This is consistent with existing Housing SPG standard 5.4.1.

Parking

Outer London Parking Standards

Waltham Forest strongly opposes the attempt to weaken parking standards in Outer London. Waltham Forest does not wish to relax its locally-set parking standards which we believe are an essential tool in restraining car trips as part of travel demand management and sustainable transport and development policies. This is essential in a borough where there are plans to build **12,000 new homes over the next five years** in an already very congested borough where population is set to increase 32% by 2041 with no corresponding increase in road network capacity. Clearly, the more space that is devoted to parking, (a relatively inefficient use of valuable land) the less is available for more “people-focussed” activity such as housing, employment and leisure.

There is also an ambitious programme to increase levels of cycling through Waltham Forest’s £30m **Mini Holland cycling programme**. Mini Holland involves reallocating road space from motor vehicles in favour of pedestrians and cyclists – measures particularly designed to favour children and less confident cyclists in residential areas of family housing. Mini Holland targets include increasing cycling to 10% of all trips by 2020 and reducing single occupancy motor vehicle use by 5%.

We also **deplore the wider messages** that weakening parking standards sends out to other boroughs as car trips originating in other neighbouring London boroughs will have a wider impact on congestion and parking in Waltham Forest. In particular we are **strongly opposed to the encouragement of minimum parking standards** rather than the current restraint-based maximum parking standards.

Electric Vehicle Charging Provision in New Developments

Waltham Forest asks that the recommended level of provision of electric vehicle charging spaces in new developments (20 per cent of spaces with a further 20 per cent ‘passive’ provision) is consistently referenced in all relevant paragraphs of the London Plan. At the moment there is inconsistent wording which is undermining this requirement.

Housing Standards, Waltham Forest's Detailed Response

Log	Policy/ Paragraph/ Table	Key Changes	Waltham Forest's Response
1	General comment		As a general principle, the minor alterations to housing standards are largely supported on the basis that they will help ensure better alignment between the London Plan and the new national space standards and updated building regulations.
2	Table 3.3, footnote 3	The nationally described space standards set a minimum ceiling height of 2.3 meters for at least 75% of the gross internal area of the dwelling. To address the unique heat island effect of London and the distinct density and flatted nature of most of its residential development, a minimum ceiling height of 2.5m for at least 75% of the gross internal area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.	<p>Notwithstanding the above comment, the new national standards on floor to ceiling heights represents a reduction from existing standards in London that have been applied since the adoption of the Mayor's 2012 Housing SPG.</p> <p>Waltham Forest believes that the unique context of London, as defined in footnote 3 of table 3.3, justifies a stronger push to apply standards that exceed the new national standards, and that are consistent with the standards in the Mayor's Adopted Housing SPG (Nov 2012). From the borough's perspective, the Mayor's existing standards have been implemented successfully since 2012 without impacting on development viability.</p> <p>It is therefore recommended that stronger wording is provided that "requires", rather than "strongly encourages", minimum ceiling heights of at least 2.5m; consistent with existing Housing SPG standard 5.4.1</p>

Parking Standards, Waltham Forest's Detailed Response

Log	Policy/ Paragraph/ Table	Key Changes	Waltham Forest's Response
1	6.13 C	<p>Planning Decisions</p> <p>The maximum standards set out in Table 6.2 in the Parking Addendum to this chapter should be the basis for considering planning applications (also see Policy 2.8), informed by policy and guidance below on their application for housing in parts of Outer London with low public transport accessibility (generally PTALs 0-1).</p>	See comments in 3 , 4 and 6 below.
2	6.13 D	<p>D In addition, developments in all parts of London must:</p> <p>a ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles</p> <p>b provide parking for disabled people in line with Table 6.2</p> <p>c meet the minimum cycle parking standards set out in Table 6.3</p> <p>d provide for the needs of businesses for delivery and servicing.</p>	<p>Waltham Forest agrees that the need to provide electric vehicle infrastructure in new developments should to be applied across London so that the added emphasis on this is welcome.</p> <p>However it should be noted that there is an urgent need to clarify the possible conflict in interpretation of the guidance between part a of this paragraph and the third footnote to Table 6.2 Car parking standards which reads "20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.". We believe that both clauses recommend the same level of charging point provision, but the latter is clearer and more explicit.</p>
3	6.13 E	<p>LDF preparation</p> <p>E</p> <p>a the maximum standards set out in Table 6.2 in the Parking Addendum should be used to set</p>	More generous parking standards in PTAL 0-1 in outer London. Waltham Forest strongly opposes this change. Waltham Forest's Development Management Policies Local Plan (Adopted 2013) stipulates a

	<p>standards in DPDs</p> <p>b in locations with high public transport accessibility, car-free developments should be promoted (while still providing for disabled people)</p> <p>c in town centres where there are identified issues of vitality and viability, the need to regenerate such centres may require a more flexible approach to the provision of public car parking to serve the town centre as a whole</p> <p>d outer London boroughs wishing to promote a more generous standard for office developments would need to take into account in a DPD</p> <ul style="list-style-type: none"> – a regeneration need – no significant adverse impact on congestion or air quality – a lack (now and in future) of public transport – a lack of existing on or off street parking – a commitment to provide space for electric and car club vehicles, bicycles and parking for disabled people above the minimum thresholds – a requirement, via Travel Plans, to reduce provision over time. <p>e 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 and their</p>	<p>maximum parking ratio of 1.0 for low PTAL areas (PTAL 1-2) and 0.75 for one or two-bedroom flats within CPZs. This compares to maximum parking ratios of between 1 and 2 in the London Plan Table 6.2.</p> <p>Waltham Forest does not wish to relax our locally-set parking standards as we are finding that our current parking standards are already an appropriate way of managing demand for car-based trips. Pressures for overspill parking, where experienced, are being managed by car-free development involving the introduction of CPZ zones in the immediate areas of developments. Waltham Forest realises that the London Plan will continue to allow for flexibility in the setting of local parking standards and we welcome the references in NPPF (Para 39)¹ which outline the factors which make this flexibility necessary. However we strongly oppose the general relaxation of parking standards in the London Plan as car trips originating in other London boroughs will have a wider impact on congestion and parking in neighbouring boroughs.</p>
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NPPF Para 39 says 39. "If setting local parking standards for residential and non-residential development, local planning authorities should take into account:

- **the accessibility of the development;**
- **the type, mix and use of development;**
- **the availability of and opportunities for public transport;**
- **local car ownership levels; and *an overall need to reduce the use of high-emission vehicles.***

		bearing on all road users, as well as the criteria set out in NPPF (Para 39).	
4	6.42i	<p>In developing their residential parking standards in the context of London Plan policy, outer London boroughs should take account of residents' dependency on the car in areas with low public transport accessibility (generally PTALs 0-1). 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 may be especially important in 'suburban' areas and for areas with family housing.</p>	<p>Waltham Forest strongly opposes this change. The borough's parking standards already take into account public transport accessibility and for the reasons given in 3 above we oppose any relaxation of maximum standards both as they are applied to the borough and more broadly as outlined in the London Plan and as they might influence other borough's parking standards. Waltham Forest objects to minimum parking standards in the context of the current local policy which seeks to manage parking pressure through travel demand management rather than predicting demand and then providing for it. There is significant evidence that the cost and availability of car parking strongly influence households' decisions to purchase and use a car. In Waltham Forest, 41.9 % of households did not have access to a car in 2001. This represented an increase from the 39 % without cars in 2001. In absolute terms there were 5,600 more such households. The Council welcomes this trend and would not want to see a move away from restraint based (maximum) parking policies that would increase car use in the borough.</p> <p>Travel demand management is also of increased importance in a borough where there are plans to build 12,000 new homes over the next five years in an already very congested borough. There is also an ambitious programme to increase levels of cycling through Waltham Forest's £30m Mini Holland programme. Mini Holland involves reallocating road space from motor vehicles in favour of pedestrians and cyclists – measures particularly designed to favour children and less confident cyclists in residential areas of family housing. Mini Holland targets include</p>

			<p>increasing cycling to 10% of all trips by 2020 and reducing single occupancy vehicle use by 5%. The borough is also keen to encourage the use of car clubs which increase access to vehicles without the overheads and inconvenience associated with car ownership and involving a much more efficient use of limited car parking spaces. Waltham Forest's population is set to increase from 265,800 (2013) to 340,000 by 2041, equivalent to total growth from 32% from 2012. Clearly, the more space that is devoted to parking, (a relatively inefficient use of valuable land) the less is available for more "people-focussed" activity such as housing, employment and leisure.</p>
5	6.42j	<p>In outer London a more flexible approach for applications may also be acceptable in some limited parts of areas within PTAL 2, in locations where the orientation or levels of public transport mean that a development is particularly dependent on car travel. Further advice is provided in the draft Housing SPG and forthcoming TfL guidance on parking design.</p>	<p>See comments in sections 3 and 4 above.</p>
6	6.42k	<p>In deciding whether or not more generous standards are to be applied, account should be taken of the extent to which public transport might be provided in the future. Consideration should also be given to the impact of on-street parking measures such as CPZs which may also help reduce the potential for overspill parking and congestion, and improve safety and amenity.</p>	<p>We are already finding it necessary to take a proactive approach to improving public transport provision and CPZ rollout in areas of housing intensification to enable car capped ratios. We are increasingly looking at lower parking ratios not higher parking ratios as the only feasible way forward in many cases significantly below 1 car parking space per unit.</p>
7	Table 6.2, Parking for	<p>Notes: All developments in areas of good public</p>	<p>See comments in 3, 4 and 6 above.</p>

	residential development, notes	<p>transport accessibility (in all parts of London) should aim for significantly less than 1 space per unit</p> <p>Adequate parking spaces for disabled people must be provided preferably on-site⁷</p> <p>20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.</p> <p>In outer London areas with low PTAL (generally PTALs 0-1), boroughs should consider higher levels of provision, especially to address ‘overspill’ parking pressures.</p>	
8	Glossary Definitions	<p>Public transport accessibility levels (PTALS) are a detailed and accurate measure of the accessibility of an area point to the public transport network, taking into account walk access time and service availability. PTALS reflect:</p> <ul style="list-style-type: none"> • walking time from the area the point of interest to the public transport access points; • the reliability of the service modes available; • the number of services available within the catchment; and • the level of service at the public transport access points - i.e. average waiting time. <p>PTALS do not consider:</p> <ul style="list-style-type: none"> • the speed or utility of accessible services; • crowding, including the ability to board services; or, • ease of interchange. 	<p>Waltham Forest agrees that PTALs can in some circumstances be crude measure of accessibility where the PTAL level can change considerably over a very short distance due to the “blocky” nature of the definitions. PTALS also do not take account of the ease of cycling to and from local destinations and public transport stops and stations. Therefore we are comfortable with the removal of the description of PTALs as a “detailed and accurate” measure.</p>