

Dear Will,

I hope this email finds you well.

I just wanted to write to you personally to say how sorry I am that I am unable to attend the Outer London Commission meeting tomorrow evening, as unfortunately I will be at MIPIM.

I have however reviewed the papers, which I hope is helpful, and have set out my thoughts below which I would be very pleased to discuss with you. Forgive the long note, but this remains a very important issue to the industry.

As you know, parking on new developments is a very contentious issue and is probably the most frequently cited issue at our public consultations. Providing the right amount of parking in a new residential development is important for our purchasers and for the local communities where we develop. Providing parking, whether in a basement or at grade with a podium above, is expensive and probably only cost neutral, so we will only provide what is needed. Our purchasers wish to be able to park their cars and the provision of parking will be an important factor in the sales rate for a development. As our research has shown, our purchasers wish to own a car but few use the car to commute to work.

Whilst I think that going as far as removing the maximum standards might not be necessary, I do think the Government is right to highlight the treatment of cars and parking and particularly the differential approach between existing homes and new development. In my view, what is needed is flexibility to reflect the circumstances of a site and the nature of the development. This is from the policy itself and the way it is applied. As we have discussed previously, the policy and matrix in London is pitched about right. Our key concern is that the starting point for TfL officers is frequently to seek car free development, regardless of what the London Plan says.

Whilst PTAL is one factor in determining the level of parking on a development, it is important to have regard to who the residents of a development will be and what their needs are. For example, our Dickens Yard development is in the heart of Ealing town centre and benefits from very good public transport accessibility. Many of the purchasers have been older people who live locally and are down sizing from large family homes. For them it is important to be able to park a car, even though they are in a town centre with good public transport. As we have discussed at the OLC, these types of developments are increasingly important in regenerating London's town centres, in increasing housing supply and in providing homes that encourage people to free up larger family homes. If it is not possible to provide an appropriate level of car parking this will frustrate their delivery.

The TfL presentation for the meeting on 10 March 2015 provides three policy options. The first option retains the maximum standard and would combine the residential and office criteria when considering the level of provision. I am extremely concerned with the suggestion of applying the office criteria to residential developments and consider that they could be used to resist parking provision. From our experience this might result in protracted debates and the requirement for yet more evidence to support our position. It is also concerning that one requirement would be to reduce provision over time. Any enhanced provision, if achieved would therefore only be short term. I do not think this reflects the Government's intentions and do not know how we would address this with our residents.

The third option, based on the NPPF parking criteria is probably preferable but I am concerned that as it does not specifically address suburbs and for family housing where on street parking is a problem, it therefore may not satisfy the Government's concern about overspill parking.

Whilst the rationale for the Alteration is to remove maximum standards and introduce flexibility, the proposed changes could actually tighten the policy. What is key for us that any change introduces sufficient flexibility to be realistic about the level of parking provision needed.

In closing, I would once again like to say how sorry I am that I won't be at tomorrow's meeting, however I do hope the above is helpful in your deliberations and of course I would be very pleased to discuss this with you further and in more detail, if you would like to do so.

With my warmest regards

Tony

Joanne Potton

PA to The Chairman, Tony Pidgley CBE

