



Councillor Stephen Carr
LEADER OF THE COUNCIL
LONDON BOROUGH OF BROMLEY

Mr William McKee CBE
Chairman
Outer London Commission
City Hall
The Queen's Walk
More London
London SE1 2AA

23rd March 2015

Dear Mr McKee,

RE: Review of Residential Parking Standards in Outer London

Thank you for the opportunity to contribute to your review of residential parking standards in outer London and for inviting representation to the sub regional meeting in Croydon on the 10th March. I welcome the Mayor of London reconvening the Outer London Commission (OLC) to look at this very important issue.

This Council made representation at the Examination in Public of the Further Alterations to the London Plan in September 2014 (copy of written submission attached), setting out strongly our position on residential parking standards. Our position still stands in this regard; that there should be significantly greater flexibility with regard to parking standards allowing boroughs to set their own standards reflecting local circumstances in line with the devolved policy making intention set out in National Planning Policy Framework.

Maximum parking standards in residential development in Outer London boroughs such as Bromley has, and continues to result in unsatisfactory residential development as a result of the impact on surrounding on-street parking.

In order to provide an evidence base to support the development of new standards in Bromley for our draft Local Plan, we have recently undertaken residents' surveys of completions over the past ten years in the borough. This concluded that 86% of those who replied (391 respondents) had at least one car. Overall findings from the survey found that parking was either an important or very important issue for 83% of residents in choosing where to live with a lot of dissatisfaction raised with us as a result of the lack of provision. This reinforces the need, in Bromley, to ensure that standards are adequate and appropriate for Bromley.

The Council's view is that the PTAL methodology does not adequately address accessibility issues in relation to outer London town centres and the rural parts of the borough. Like many outer London town centres, Bromley town centre, and to a lesser extent Orpington, Beckenham and Penge have high PTAL ratings because they are hubs for bus (and tram) services and also have direct radial rail connections to central London. However, the choice of destinations, the opportunity for interchange, and the connectivity with other centres (except, to a degree, central London) is much less than is typically the case in inner and central London. PTAL levels drop off very quickly as you begin to leave urban town centres and as a result can not be used as a meaningful and reliable parameter to purely base parking standards on.

The above reinforces the fundamental point that outer London boroughs are not homogenous and therefore even a revised standard for this part of London is still not sufficient locally. Bromley has one of the lowest levels of public transport accessibility with 75% of residents living in wards that fall below the outer London average despite our continued lobbying for public transport improvements.

Responses to the questions posed by the OLC on parking standards can be found attached to this letter.

Yours sincerely

A handwritten signature in black ink that reads "Steve Carr". The signature is fluid and cursive, with a long horizontal stroke extending from the start of the word "Steve".

Cllr Stephen Carr

APPENDIX – RESPONSE TO POSED QUESTIONS

What is the role of residential parking standards and what is ‘the problem’ that needs to be addressed?

Locally determined residential parking standards allow the Council to ensure appropriate parking provision at new developments in the borough. Given the lower than average public transport accessibility levels along with higher levels of car ownership the need to have appropriate standards specific to the borough is paramount. These local standards should also consider the similarities to neighbouring authorities outside London including Kent and Surrey.

Our own parking standards would allow us to ensure necessary constraint in places with good public transport accessibility such as our metropolitan and major town centres as well as providing sufficient parking provision in the more rural and outer parts of the borough such as Biggin Hill. The FALP standards, whilst offering some flexibility, do not extend enough to make necessary provision in areas where there is greater reliance on the car.

Current standards do not provide for acceptable levels of development.

Are there car parking overspill issues? in which circumstances (type and geographical spread)? if so, how might these best be addressed?

Yes. Overspill issues typically although not exclusively generate from smaller infill developments. Such developments permitted can be in already heavily parked areas causing significant parking pressures on the existing network. High density developments on small footprints usually in town centres equally have adverse impact on surrounding roads as a result of overspill.

On larger ‘self-contained’ developments where insufficient parking has been provided particularly for units of 2 bedrooms or fewer, the resultant on-street parking causes access problems in the narrow streets of the development.

Whilst this can theoretically be overcome by car-free development, residents of these developments who own cars will typically park them further away from the development again causing parking problems in near-by streets even if not in the immediate vicinity of the development.

How do maximum residential parking standards affect parking levels, car ownership and car use?

There does not appear to be any evidence to suggest that maximum parking standards restrict car ownership. The Berkeley Homes report ‘Does Car Ownership Increase Car Use’

Whilst fewer parking spaces on a development mean that fewer cars can be parked there, residents who need to own cars to access parts of the Borough

inaccessible by public transport will still own a car across the developments we surveyed, average car ownership was 1.14.

What impact do you think a change to residential parking standards will have on congestion and the demand for destination parking?

The Berkeley Homes report 'Does Car Ownership Increase Car Use' found through their research that there was no relationship between car ownership and peak hour car use. It could therefore be further inferred that residential parking standards equally have no relationship with peak car use and therefore congestion.

Inevitably there will be trade offs, with different winners and losers for different policy options ... what should the priorities be?

The priority should be for Council's to be able to determine their own standards to reflect local characteristics. Consideration of existing local residents should remain a priority throughout in order to protect against any detrimental impact.

How do car parking standards affect appetite for and economics of development?

When asked in our parking survey, residents of new developments 83 percent of respondents said that parking was either an important or very important consideration when choosing where to live. Indeed some respondents to the survey appear to have paid substantial amount for a parking space.

The economics of a development need to be balanced with the resulting satisfaction of its future residents.

The level of parking in developments varies according to location and local characteristics and there is insufficient evidence that requiring adequate parking has prevented development. Developers would often prefer to provide less parking and more residential units to maximise short term profits.

What impact would a change in standards have on local authority revenue streams from parking?

A change in the standards would be unlikely to have any effect on our revenue from parking. Instead, constrained parking standards in an area could create additional expense to the Council and local residents should a CPZ require being implemented as a result of additional pressure / demand from new residents.

Would practical guidance for how to deliver parking in a way that minimises impacts be of value... what advice could be provided to improve residential parking implementation?

Through our residents' survey work, we found particular issues raised with the design of new development in particular road widths, garages/carports, and car courts behind housing. Practical design guidance for London could be sensible in ensure minimum/recommended dimensions.

This survey work also found that of the 36% of respondents who had a garage/carport, less than one fifth actually used it to park their vehicle. The Council is therefore considering whether to include garages/carports in the total count of parking provision, particularly those with smaller internal measurements of 3m x 6m in order to allow the parking of a vehicle.

What are the issues associated with allocated versus unallocated development?

Both allocated and unallocated sites should provide acceptable developments. Adequate parking is part of the overall scheme development. Small infill sites face different difficulties in providing parking to larger sites which typically have greater flexibility in how this may be achieved.

What other mechanisms could be used to manage parking provision/impacts, e.g. consolidated or shared parking, CPZs etc.

Experience shows that residents favour parking where they can see their vehicle in a safe and secure environment. Therefore we do not favour consolidated parking including car courts which in some cases are not used due to security and inaccessibility issues, moving parking to streets not designed for parking with the development intending that cars be parked in car courts.

CPZs may be necessary if insufficient parking causes overspill into already heavily parked areas. Implementing further parking controls to manage parking provision and impact is not welcomed by the Council. Although larger developments have unadopted roads and can therefore accommodate parking and traffic within their own boundaries, the Council often receive complaints from residents to do something. This Council does not, nor will they have an active role in implementing parking control measures on new developments.

How far do parking levels affect issues such as density and acceptability of development/its impacts?

Providing adequate parking is part of the acceptability of a scheme. Density of development will depend on providing adequate parking, amenity space, room sizes and reflect the local character in terms of scale, bulk and design of a development. Parking is one of the factors which will increase with a higher

density development, and therefore be one of the factors which may make it unacceptable, either the lack of parking, or the potential impact on highways, congestion and road safety.

Is it possible to develop a 'typology' of places and if so, what factors should be considered in terms of parking requirements for different types of places?

In developing locally determined standards, we are exploring a zonal approach to parking standards around town centres, considering public transport accessibility, although not limited to PTAL, but also taking into consideration existing parking pressures, controls, housing density, and local characteristics.

DRAFT FURTHER ALTERATION TO THE LONDON PLAN

EXAMINATION IN PUBLIC

London Borough of Bromley

Participant number: 18

Matter Opportunity Areas

Session 12

Thursday 18 September

Opportunity Areas

No.2, Bromley

- a. Is the type and level of development appropriate and can it be delivered?
- b. Have the impacts of the level of new development planned in the opportunity areas on surrounding areas, including implications on existing and planned infrastructure been taken into account

Summary

1. Bromley gave a cautious welcome to Opportunity Area status for Bromley Town Centre but needs to be assured that this capacity can be delivered while maintaining the special character of the town centre and its role as a Metropolitan Town Centre, and the need for careful assessment of the potential capacity and improvement to transport and infrastructure improvements. The Council also asked for reference to the DLR extension to Bromley North to be included in the Opportunity Area description.
2. The Opportunity Area status needs to support the town centre's role and not undermine it. The Council considers that the downgrading of the town centre classification from A/B to B (which forms part of Matter 7) goes against the proposed Opportunity Area status, and sends the wrong signal to investors. The character of the town centre could be damaged if the Opportunity Area status is used to increase densities above the level which would maintain and enhance the particular character of the town centre.
3. Improvements to Bromley North station, including the frequency of train services, and to the interchange will be important in supporting the adjacent area as a proposed Business Improvement Area in Bromley's emerging Local Plan, and the in securing a balance of commercial and residential uses and the overall level of growth.

4. The Council seeks amendments to the description of the Bromley Opportunity Area in Annexe One Table A1.1 Opportunity Areas paragraph 2 as set out at the end of this paper.

Bromley Town Centre Area Action Plan

5. The Bromley Town Centre Area Action Plan (BTCAAP) adopted in 2010 sets out a strategy for growth in the town centre of around 2,000 jobs and 1,800 homes over the fifteen year period 2010-2015.
6. The BTCAAP identified a series of Opportunity Sites to deliver the scale of development anticipated. Planning permission has been granted for several sites for mixed use development, and others are being progressed with anticipated planning applications later this year and early next year. The exception is the former Opportunity Site A which following a High Court ruling is being progressed as part of the Local Plan process.
7. The Council is still seeking for the BTCAAP to be delivered.

Additional Growth

8. The Opportunity Area description includes residential growth over and above the BTCAAP figure of 700 homes. If this is assumed to be delivered in the years 2026- 2036 this would be an annual delivery of 70 homes per annum.
9. The Council has concerns that the forecast growth could create pressure for developments which would have a detrimental impact on the character of the Town Centre, and would be looking to identify the broad location/approach to delivery within the Bromley Local Plan/review of BTCAAP following the finalisation of the Local Plan.

Infrastructure requirements

10. BTCAAP identifies infrastructure required for its delivery, in particular, junction improvements, and the widening of the A21 at Bromley Common. In additional improvements sought through delivery of the former Opportunity Site A Bromley North included improved public transport interchange and the possible introduction of future transport system to be safeguarded in consultation with TfL, Network Rail, LB Lewisham. Opportunity Site A as outlined earlier, will be included in Bromley's Local Plan and discussions with the GLA, TfL and LBL Lewisham have included the potential for the DLR extension as included in the London Plan (2011). The more immediate improvement of public transport services to Bromley North and the town centre as a whole should be a priority to support the delivery of the Opportunity Area aspirations, and should therefore be specifically referenced in the Opportunity Area description within Annex One.
11. Bromley's 'Draft Policies and Designations' consultation document identifies the area around Bromley North Station as a Business Improvement Area, and this together with public transport improvements could facilitate the level of growth required.

12. The town centre, and its opportunity area status anticipate, and require a balance of employment and residential growth. It is anticipated that the town will lose commercial floorspace through changes to residential use through permitted development rights, and through an increase in mixed use development, in particular where residential development can be shown to assist with viability of delivery of commercial floorspace. To counter this, and ensure a quality of commercial development the improvement of Bromley North station and accessibility to, and connectivity with the area is important to creating a successful Business Improvement Area and town centre.

Conclusion

13. The Council maintains its cautious welcome of Opportunity Area status for Bromley Town Centre, but seeks the FALP description in Annexe One Table A1.1 to be amended with the existing third sentence '**Potential improvements to public transport should be considered in conjunction with the scope to optimise development capacity associated with the town centre and its environs**' replaced with '***The Mayor, TfL and LB Bromley will work together to increase accessibility/connectivity between Bromley Town and Canary Wharf/Docklands, improved services to/from Bromley North station to Central London, and improvements to the public transport interchange supporting the delivery of the anticipated growth***'.

Appendix One Extract from LB Bromley Draft Policies and Designations