

# **Integrated Impact Assessment**

Report

April 2015

Minor Alterations to the London Plan

**PARKING STANDARDS**

**MAYOR OF LONDON**

**Greater London Authority  
May 2015**

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## **Contents**

0.	Non – Technical Summary	1
1.	Introduction	5
2.	Overview of the Minor Alteration to the London Plan	6
3.	Methodology	7
4.	Assessment of proposed alteration : Parking	14
5.	Assessment of alternate alteration : Parking	20
6.	Conclusions	23
	Appendix 1 - Maps	24
	Appendix 2 - Responses to Scoping report from Statutory Consultees	25

## Non-Technical Summary

- 0.1 This is a non-technical summary of the Integrated Impact Assessment (IIA) Report which sets out how the environmental, social and economic performance of the proposed Parking Standards Minor Alterations to the London Plan (MALP) have been assessed against a series of sustainability objectives. The following sections provide an outline of the content of the proposed Parking Standards and the methodology used to assess it.
- 0.2 This document is subject to public consultation, alongside the proposed alteration. Details on how to comment on this IIA are set out on page 6.

What are the Minor Alterations to the London Plan (Parking)?

- 0.3 The Spatial Development Strategy for London (commonly known as the London Plan) is required under the Greater London Authority Act 1999 (as amended). The London Plan deals with matters of strategic importance to Greater London. The local plans, and related documents, produced by the London Boroughs are required to be ‘in general conformity’ with the London Plan. The London Plan is required to be kept under review and to be in conformity with national policy. The Mayor produced Further Alterations to the London Plan (FALP) and the amended London Plan was published, to include these alterations, in March 2015.
- 0.4 Whilst agreeing that the Mayor could publish his updated version of the London Plan, including the FALP the Parliamentary Under Secretary of State (Planning) expressed his concerns over the London Plan car parking policy. To ensure that the FALP was not delayed the Mayor amended the London Plan to include the following text at paragraph 0.16H
- “He will also give active consideration to addressing changes to national policy on car parking should Government bring these forward. The Mayor recognises the flexible approach in the National Planning Policy Framework on parking standards, and the abolition of maximum parking standards in national policy. National planning guidance published in 2014 also recommends that planning policies should consider how parking provision can be enhanced to encourage the vitality of town centres. Whilst the Mayor considers that there are sound reasons for retaining residential parking standards in core and inner London, he recognises the opportunity to adopt a more flexible approach in parts of outer London, especially where public transport accessibility levels are lower. He therefore intends to bring forward an early review of parking standards in Outer London in advance of the general review of the Plan. In doing so he will give active consideration to any changes to national policy on car parking should Government bring these forward.”*

- 0.5 To address the Government’s concerns over parking policy and to address amendments to the National Planning Policy Framework (NPPF)<sup>1</sup> a minor alteration is being proposed and consequently, an IIA is being produced to assess the impact of the proposed parking alteration. Prior to the preparation of this IIA Report a Scoping Report was prepared and comments on the proposed scope sought from the statutory consultees. This alteration is not a full review of the London Plan 2011 (as amended), as not all policies are being proposed for alteration. The proposed Parking Standards MALP will address one policy – Policy 6.13 Parking standards and the related parking addendum.

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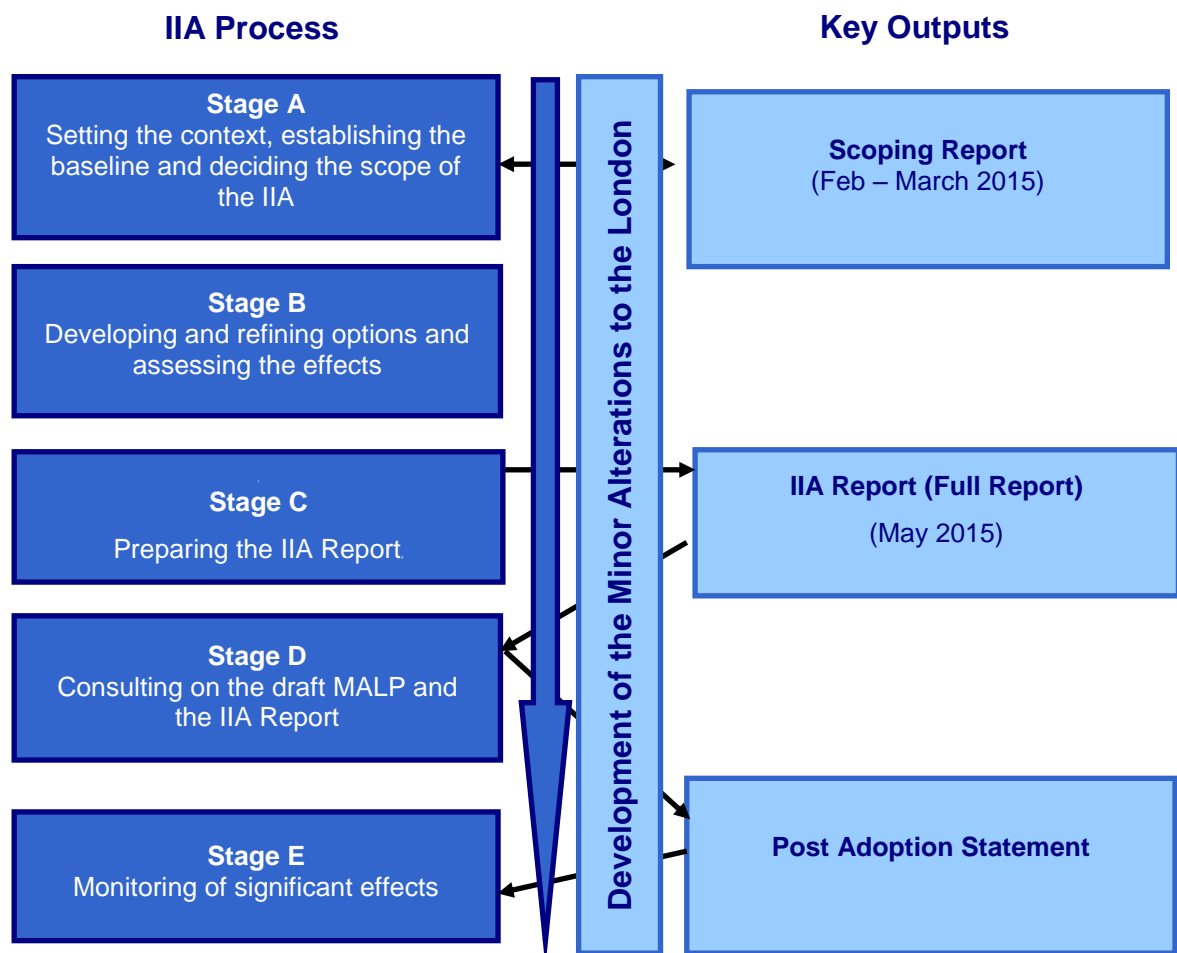
<sup>1</sup> Department for Communities and Local Government and Eric Pickles Written Statement to Parliament Planning update March 2015 <https://www.gov.uk/government/speeches/planning-update-march-2015>

- 0.6 The Mayor is carrying out separate alterations to the London Plan to address the Government's policy on housing standards and energy. This alteration is known as the Housing Standards Minor Alterations to the London Plan (MALP) . A separate IIA is being undertaken to assess those policy alterations.

What is an integrated Impact Assessment?

- 0.7 This IIA fulfils the requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), in a manner that incorporates the requirements of the European Union's SEA Directive (2001/42/EU) and the transposing UK regulations. The IIA also fulfils the requirements for Health Impact Assessment, Community Safety Impact Assessment and consideration of equalities effects. This integrated approach enables the potential impacts to be assessed collectively and avoids the need to undertake and report on separate assessments, educing any duplication of assessment work. The diagram below shows an overview of the key stages of the IIA process. The IIA Scoping report (Stage A) was subject to consultation with the statutory SEA consultees<sup>2</sup> in February-March 2015. Where appropriate, responses to the Scoping Report have been reflected in this IIA report. The consultation on this IIA report is Stage D in figure 1 below and follows the iterative assessment of effects and the preparation of this report.

**Figure 1 – Main stages of the IIA process**



<sup>2</sup> English Heritage, Environment Agency and the Natural England

- 0.8 The assessment of the proposed Parking Standards MALP has been undertaken using an objectives-led approach. The IIA objectives (identified below) have been informed by baseline evidence, the consideration of the key sustainability issues for London, the review of plans and programmes and the comments received during the consultation of the IIA Scoping Report. They have also built upon objectives identified within previous IIAs of the London Plan. Broadly, the objectives present the preferred environmental, social or economic outcome which typically involves minimising detrimental effects and enhancing positive effects. They have been formulated to allow for an assessment of the key effects of the implementation of the proposed Parking Standards MALP.

**Figure 2. IIA Objectives**

<b>IIA Objectives</b>	
<b>1. Regeneration &amp; Land-Use.</b>	To stimulate regeneration and urban renaissance that maximises benefits the most deprived areas and communities.
<b>2. Biodiversity.</b>	To protect, enhance and promote the natural biodiversity of London.
<b>3. Health and Well-being.</b>	To maximise the health and well-being of the population and reduce inequalities in health.
<b>4. Equalities.</b>	To advance the equality of opportunity for all communities and especially between people who share a protected characteristic, and those that do not have that characteristic in order to minimise, discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London in a way that brings all Londoners together.
<b>5. Housing.</b>	To ensure that all Londoners have access to good quality, well-located housing that is affordable.
<b>6. Employment.</b>	To offer everyone the opportunity for rewarding, well-located and satisfying employment.
<b>7. Stable Economy.</b>	To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.
<b>8. Flood Risk and Climate Change Adaptation.</b>	To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.
<b>9. Climate Change Mitigation and Energy.</b>	To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.
<b>10. Water Quality &amp; Water Resources.</b>	To protect and enhance London's waterbodies and the Blue Ribbon Network and help to ensure a sustainable and affordable supply of clean water.
<b>11. Waste.</b>	To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.

**12. Accessibility and Mobility.** To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).

**13. Built and Historic Environment.** To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces are appropriately designed.

**14. Liveability and Place.** To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.

**15. Open Space.** To protect and enhance natural open space in London.

**16. Air Quality.** To improve London's air quality.

- 0.9 The IIA identifies and assesses those likely effects arising from the proposed Parking Standards MALP. Specifically, it considers the extent to which the proposed Parking Standards MALP (and its alternatives) contribute towards achieving the IIA objectives when considered against the baseline.

What strategic options were considered?

- 0.10 Given that the Mayor has committed himself to a review of the residential parking standards in outer London only (see paragraph 0.4 above), the scope for reasonable alternatives are limited. The reasonable alternative options for this proposed alteration are considered to be:
- **Do not** update the London Plan; and
  - **Include** a policy alteration
    - Allow/encourage more flexibility in PTALs 0-1 in outer London (preferred option)
    - Allow/encourage more flexibility in more PTAL areas such as 0-2/3 in outer London

What are the likely effects of the proposed Minor Alteration?

- 0.11 When assessed against the 16 objectives set out above, the preferred policy alteration has been assessed to be generally positive for social and economic outcomes but slightly negative for environmental outcomes. However, it should be noted that the proposed alteration only affects a small proportion of London where a limited amount of housing is delivered. Therefore, both positive and negative impacts are relatively limited.

How will any likely effects of the alteration be monitored?

- 0.12 If approved, the effects of the proposed Parking Standards MALP will be monitored via the London Plan Annual Monitoring Report. Key Performance Indicators (KPIs) 13-15 dealing with reducing reliance on the private car and increasing use of more sustainable modes will be the most relevant to this proposed alteration. However, the KPIs on density of development (2), housing supply (4) and health inequalities (6) will also be relevant. Transport for London also produces a wide range of annual statistics and reports that can be used for monitoring purposes. The GLA and other Government

Department monitor wider social and environmental performances including on air quality and flooding.

What are the next steps?

- 0.13 This IIA report is issued for consultation alongside the draft Parking Standards MALP. Consultation will last for 6 weeks from the 11<sup>th</sup> May. It is available online and can be downloaded from [www.london.gov.uk](http://www.london.gov.uk). All responses must be received by **5pm** on **Monday 22<sup>nd</sup> June 2015**. Responses can either be:

By email to [mayor@london.gov.uk](mailto:mayor@london.gov.uk) with 'MALP – Parking IIA' in the title, or  
By post (no stamp required) to:

Mayor of London  
London Plan – Minor Alteration to the London Plan  
Freepost LON15799  
GLA, City Hall, PP18  
The Queen's Walk  
London SE1 2AA

Please note, if you send in an email it is not necessary to send a hard copy. All responses will be made available for public inspection.



## 1. Introduction

- 1.1 The Mayor is responsible for keeping the London Plan, which provides the statutory planning framework to guide London's future development, under review. The full review of the Plan was published in July 2011. There has been an early alteration (published October 2013) and a further alteration (published March 2015) to the London Plan. This IIA covers the proposed Minor Alteration to the London Plan (MALP) on parking. This IIA Report presents an assessment of the environmental, social and economic performance of the proposed Parking Standards MALP against the set of sustainability objectives which were developed alongside the development of the London Plan and its alterations. It follows consultation (February-March 2015) on the Scoping Report (attached as Appendix 2) with the statutory consultees<sup>3</sup>.
- 1.2 A Strategic Environmental Assessment (SEA) of plans and programmes that are considered to have significant effects on the environment is required under the European Directive 2001/42/EC ('SEA Directive'). The objective of a SEA, as defined in the Directive is:

*'To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to contributing to sustainable development.'*
- 1.3 The SEA Directive was transposed into UK law in 2004 through the Environmental Assessment of Plans and Programmes Regulations 2004. A Sustainability Appraisal (SA) is required under the Planning and Compulsory Purchase Act 2004 as well as the Strategic Environmental Assessment of Plans and Programmes Regulations 2004. The SA is based on the principles of the SEA but has a wider focus, in addition covering key consideration of social and economic sustainability. The Mayor has further legal duties to consider equalities, health equalities and community safety. Rather than produce many separate reports that consider each of these potential impacts, these elements have been integrated into this single Integrated Impact Assessment (IIA) which will enable synergies and cross-cutting impacts to be identified as part of an iterative approach to the assessment. This integrated approach has been undertaken for the London Plan and subsequent revisions and alterations.
- 1.4 Authorities are also required to assess the effects of land use plans on European sites of nature conservation to determine whether there will be any 'likely significant effects' on these sites as a result of the plan's implementation or in combination with other plans and projects. A Habitats Regulations Screening Assessment has been prepared and will be published alongside the Parking Standards MALP and this IIA.
- 1.5 The purpose of this IIA report is to present the findings of the impact assessment of the proposed Parking Standards MALP against a range of social, economic and environmental objectives. The remaining sections of this report are as follows:
  - Section 2 Overview of the proposed Minor Alteration (Parking) – context
  - Section 3 Methodology – what will be assessed? How?
  - Section 4 Assessment – assessment of parking policy alterations
  - Section 5 Assessment – assessment of the preferred and alternative policies
  - Section 6 Conclusions.

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<sup>3</sup> English Heritage, Environment Agency and Natural England

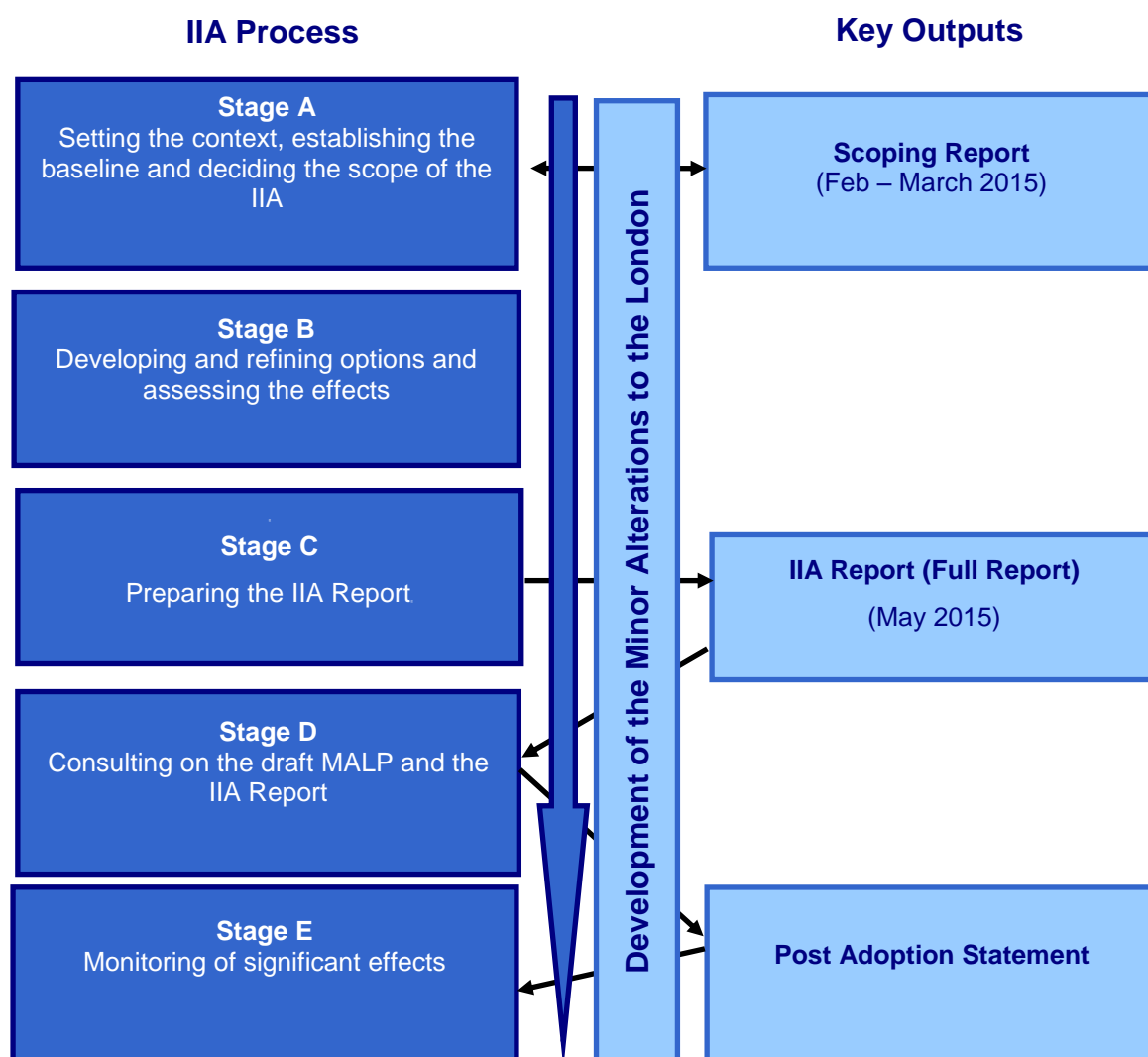
## **2. Overview of the Minor Alteration to the London Plan (Parking)**

- 2.1 This section provides an overview of the proposed Parking Standards MALP. It highlights the need for the alteration to the existing London Plan and an overview of the proposed Parking Standards MALP.
- 2.2 Paragraph 1.1 above sets out the recent timeline of alterations to the London Plan 2011. In agreeing to the most recent set of alterations the Parliamentary Under Secretary of State (Planning) expressed his concerns over the approach set out in the London Plan towards car parking policy and whether it reflected national policy. To ensure that the FALP was not delayed the Mayor amended the London Plan to include the following text at paragraph 0.16H:
- “He will also give active consideration to addressing changes to national policy on car parking should Government bring these forward. The Mayor recognises the flexible approach in the National Planning Policy Framework on parking standards, and the abolition of maximum parking standards in national policy. National planning guidance published in 2014 also recommends that planning policies should consider how parking provision can be enhanced to encourage the vitality of town centres. Whilst the Mayor considers that there are sound reasons for retaining residential parking standards in core and inner London, he recognises the opportunity to adopt a more flexible approach in parts of outer London, especially where public transport accessibility levels are lower. He therefore intends to bring forward an early review of parking standards in Outer London in advance of the general review of the Plan. In doing so he will give active consideration to any changes to national policy on car parking should Government bring these forward.”*
- 2.3 The Greater London Authority Act (GLA) Act 1999 (as amended) requires the Mayor to produce a Spatial Development Strategy (generally known as the London Plan) and to keep it under review. The Mayor, as he is required to do so, has undertaken an Integrated Impact Assessment (IIA) of the proposed alteration. The proposed Parking Standards MALP addresses the effect on parking policy and the associated parking addendum.
- 2.4 A large proportion of the existing baseline used previously for the FALP has not changed in the short period between the FALP review and this draft Parking Standards MALP review. Documents and information have been updated where appropriate.

### 3. Methodology

- 3.1 This IIA Report provides an assessment of the proposed Parking Standards MALP and its alternatives. The approach adopted in this IIA Report is in accordance with the requirements of SEA and has been expanded to include a wider range of issues normally found within a SA, as well as those relevant to Health Impact Assessment, Equalities Impact Assessment, and Community Safety Impact Assessment. The approach is based on the five main stages of SA and is outlined in figure 3 below.

**Figure 3 – Main stages of the IIA process**



- 3.2 This section sets out the methodology, including the scope of the assessment, the method of collecting and presenting the baseline, objectives and issues, and assumptions and technical difficulties. For consistency, the approach taken in this IIA Report is consistent with the full IIA report (December 2013) for the FALP. This in turn builds upon earlier assessments undertaken for earlier iterations of the London Plan 2011. The key sustainability issues and the IIA objectives set out in those previous assessments have been taken as the starting point for scoping the framework of this IIA and updated if necessary.

## Scope

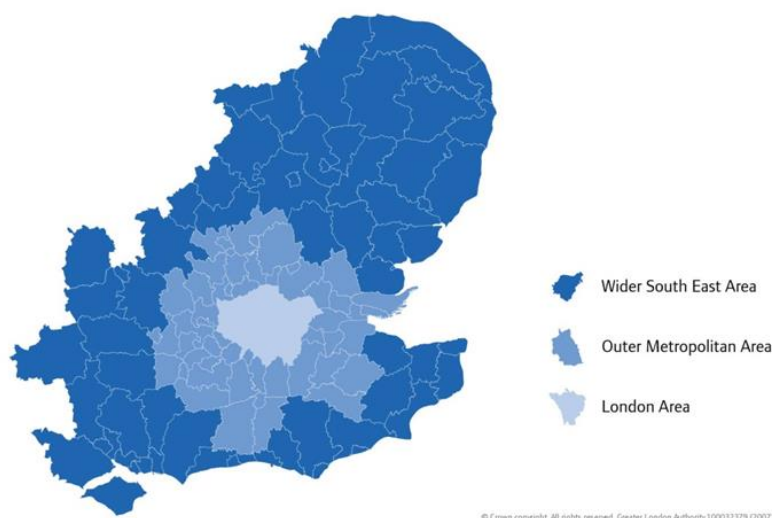
### Spatial scope

- 3.3 The thematic topics which have been scoped into this IIA Report have been informed by the topics identified in Annex I of the SEA Directive. In general the assessment includes any geographic areas affected by the policy alterations within Greater London and, if appropriate, beyond the boundaries of Greater London into the neighbouring East of England and South East of England regions, and the wider UK. The proposed alteration focuses on residential car parking in low Public Transport Accessibility Levels (PTAL) areas in outer London. However, it is likely to have some, although small implications for land uses and transport in inner London and perhaps a slightly greater impact in the areas adjoining London where public transport provision is also limited.

**Figure 4. Map of Outer London, Inner London and Central Activities Zone**



**Figure 5. Map of Greater London and its adjoining outer Metropolitan Area**



## Temporal Scope

- 3.4 The effects of the policy alterations may change over time (in the short, medium and long term) for a number of reasons. The temporal effects of the policies have been considered in the assessment (where relevant). For the purposes of the assessment the timescales are defined as follows:

**Short term:** This may be taken to refer to the effects that occur within the first five years of the implementation of the Parking Standards MALP;

**Medium term:** This may be taken to refer to the effects occurring between five and 15 years following adoption of the Parking Standards MALP; and

**Long term:** This may be taken to refer to the effects occurring beyond 15 years and which may arise beyond the Plan's specified lifetime (post 2036).

## Baseline

- 3.5 The SEA Directive requires a review of the plan's "*relationship with other relevant plans and programmes*". Relevant documents to the London Plan were identified and reviewed as part of this full IIA Report. Additional plans and programmes considered specifically relevant to these policy alterations are listed in section 5 of the IIA Scoping Report and updated in Appendix 1 of this report.
- 3.6 An essential part of the IIA process is to identify the current baseline environmental, economic and social conditions and where possible the likely evolution of these conditions following a 'business as usual' scenario. It is only with sufficient knowledge of the existing conditions that the key issues may be identified and addressed through the assessment process by providing the context for determining the contribution that the plan may make towards the achievement of the objectives. As set out earlier existing baseline evidence from the previous FALP assessment has been updated for this proposed Parking Standards MALP. This was set out in the IIA Scoping Report (Table 2 – section 5).

## Sustainability objectives for the IIA

- 3.7 The establishment of appropriate objectives and indicative guide questions are central to the assessment process and provide a way in which the performance and effects of the proposed Parking Standards MALP can be identified and described. Using objectives ensures that each topic area required by the SEA regulations is addressed and provides a framework which guides the assessment in a consistent manner enabling the likely effects of the implementation of Parking Standards MALP to be identified. Using this approach will ensure consistency with the previous IIAs of the London Plan and its alterations.
- 3.8 This objective-led approach enables the appraisal to identify the extent that the proposed Minor Alterations (Parking) contribute towards each objective, rather than if they will meet prescribed targets. It is therefore more qualitative and allows for a greater degree of the identification and description of effects rather than attempting to ascribe a quantitative value, which is more restrictive at a strategic level.
- 3.9 The sustainability objectives described in this section have evolved over a number of years and have been informed by baseline evidence, the consideration of the key

sustainability issues for London, the review of plans and programmes and the comments received during the consultation of the Scoping Report. They have also built upon objectives identified within previous IIAs of the London Plan. Broadly, the objectives present the preferred environmental, social or economic outcome which typically involves minimising detrimental effects and enhancing positive effects. They have been formulated to allow for a comprehensive appraisal of the likely effects of the implementation of the Parking Standards MALP by covering the relevant social, economic and environmental aspects.

- 3.10 The indicative guide questions have been formulated to provide additional guidance on aspects that could be considered with regards to the likely effects that may occur. They are not designed to be read as targets or aims with which to achieve the objective. Furthermore, a general assumption that underpins the sustainability objectives is that all existing legal requirements will be met and, as such, statutory compliance has not been reflected individually within the objectives or within the guide questions. The objectives and guide questions are listed in Table 3.1. The scoring system used in the IIA is shown in Table 3.2.
- 3.11 The assessment examines the policy against each of the 16 IIA objectives. In predicting effects, changes are identified in the baseline which would occur as a result of the implementation of the policy alterations together with the remaining policies in the London Plan. Due to the strategic and forward-looking nature of the policies, quantitative information is not always available to inform the prediction of effects. Where this is the case, the effects have been identified based on professional judgement with consideration of relevant best practice guidance.

**Table 3.1 - Sustainability Objectives and Guide Questions for the IIA**

Sustainability Objectives	Guide Questions for the IIA	SEA Topic Requirement
<b>1. Regeneration &amp; Land-Use.</b> To stimulate regeneration and urban renaissance that maximises benefits for the most deprived areas and communities.	<ul style="list-style-type: none"> <li>Will the regeneration have benefits for deprived areas?</li> <li>Will it help to make people feel positive about the area they live in?</li> <li>Will it help to create a sense of place and 'vibrancy'?</li> <li>Will it help reduce the number of vacant and derelict buildings?</li> <li>Will it make the best use of scarce land resources and reuse brownfield sites?</li> <li>Will it minimise impacts of development on the environment?</li> <li>Will it help address contamination, including of land?</li> </ul>	Material Assets
<b>2. Biodiversity.</b> To protect, enhance and promote the natural biodiversity of London.	<ul style="list-style-type: none"> <li>Will it conserve and enhance habitats and species and provide for the long-term management of natural habitats and wildlife (in particular will it avoid harm to national or London priority species and designated sites)?</li> <li>Will it improve the quality and extent of designated and non-designated sites?</li> <li>Will it provide opportunities to enhance the environment and create new conservation assets (or restore existing wildlife habitats)?</li> <li>Will it protect and enhance the region's waterbodies to achieve a good ecological status?</li> <li>Will it promote, educate and raise awareness of the enjoyment and benefits of the natural environment?</li> <li>Will it bring nature closer to people, especially in the most urbanised parts of the city?</li> <li>Will it promote respect and responsibility for the wise management of biodiversity?</li> <li>Will it improve access to areas of biodiversity interest?</li> <li>Will it enhance the ecological function and carrying capacity of the</li> </ul>	Biodiversity, Fauna, Flora, Soil, Water, Landscape

	<ul style="list-style-type: none"> <li>green space network?</li> <li>Will it promote a network of green infrastructure?</li> </ul>	
<b>3. Health and Well-being.</b> To maximise the health and well-being of the population and reduce inequalities in health.	<ul style="list-style-type: none"> <li>Will it help reduce poverty and the impact of income inequality?</li> <li>Will it help reduce health inequalities?</li> <li>Will it help improve mental and emotional health?</li> <li>Will it improve access to high quality public services (including health facilities)?</li> <li>Will it help reduce the misuse of substances?</li> <li>Will it help people to live an inclusive and active lifestyle?</li> <li>Will it promote a sense of well-being?</li> </ul>	Population, Human Health
<b>4. Equalities.</b> To advance the equality of opportunity for all communities and especially between people who share a protected characteristic, and those that do not have that characteristic in order to minimise discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London in a way that brings all Londoners together.	<ul style="list-style-type: none"> <li>Will it reduce poverty and social exclusion in those areas and communities most affected?</li> <li>Will it remove or minimise disadvantage suffered by persons who experience disadvantage or discrimination?</li> <li>Will it, in particular address the housing, cultural, social and employment needs of those with protected characteristics?</li> <li>Will it reduce the level of crime experienced by those with protected characteristics?</li> <li>Will it promote adequate accessibility, in particular for older or disabled people?</li> </ul>	Population, Human Health
<b>5. Housing.</b> To ensure that all Londoners have access to good quality, well-located housing that is affordable.	<ul style="list-style-type: none"> <li>Will it reduce homelessness and overcrowding?</li> <li>Will it reduce the number of unfit homes?</li> <li>Will it increase the range and affordability of housing (taking into account different requirements and preferences of size, location, type and tenure)?</li> <li>Will it ensure that appropriate social and environmental infrastructure are in place for new residents?</li> <li>Will it provide housing that ensures a good standard of living and promotes a healthy lifestyle?</li> <li>Will it promote lifetime homes?</li> <li>Will it improve overall design quality?</li> <li>Will it increase use of sustainable design and construction principles?</li> <li>Will it improve insulation, internal air quality and energy efficiency in housing to reduce fuel poverty and ill-health?</li> <li>Will it provide housing that encourages a sense of community and enhances the amenity value of the community?</li> <li>Will it ensure homes are well located in relation to flood risk?</li> <li>Will it promote the increased supply of housing?</li> </ul>	Population, Human Health, Material Assets
<b>6. Employment.</b> To offer everyone the opportunity for rewarding, well-located and satisfying employment.	<ul style="list-style-type: none"> <li>Will it help generate satisfying and rewarding new jobs?</li> <li>Will it help to provide employment in the most deprived areas and stimulate regeneration?</li> <li>Will it help reduce overall unemployment, particularly long-term unemployment?</li> <li>Will it help to improve learning and the attainment of skills?</li> <li>Will it encourage the development of healthy workplaces?</li> <li>Will it provide employment in accessible locations?</li> </ul>	Population, Material Assets
<b>7. Stable Economy.</b> To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.	<ul style="list-style-type: none"> <li>Will it improve sustainable business development?</li> <li>Will it improve the resilience of business and the economy?</li> <li>Will it help to diversify the economy?</li> <li>Will it prevent the loss of local businesses?</li> <li>Will it encourage business start-ups and support the growth of businesses?</li> <li>Will it encourage ethical and responsible investment?</li> <li>Will it help reduce levels of deprivation?</li> <li>Will it support the development of green industries and a low carbon economy?</li> <li>Will it support other niche or emerging sectors of the economy?</li> <li>Will it help maintain London as an internationally competitive city?</li> <li>Will it support the infrastructure required by a growing and changing economy?</li> </ul>	Population, Material Assets,

<p><b>8. Flood Risk and Climate Change Adaptation.</b> To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.</p>	<ul style="list-style-type: none"> <li>• Will it protect London from climate change impacts?</li> <li>• Will it minimise the risk of flooding from rivers and watercourses to people and property?</li> <li>• Will it manage existing flood risks appropriately, including taking opportunities to reduce existing flood risk and avoid new flood risks?</li> <li>• Will it minimise and manage the effects of surface water flooding?</li> <li>• Will it help London function during periods of drought?</li> <li>• Will it help avoid overheating in the built environment?</li> <li>• Will it support social and physical infrastructure to be resilient to climate change impacts?</li> <li>• Will it minimise the health impacts due to the impacts of climate change?</li> <li>• Will it contribute to ensuring an adequate water supply to London, including by using existing water resources efficiently?</li> </ul>	Climatic Factors
<p><b>9. Climate Change Mitigation and Energy.</b> To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.</p>	<ul style="list-style-type: none"> <li>• Will it help minimise emissions of greenhouse gases?</li> <li>• Will it help London meet its emission targets, including through off-setting existing emissions?</li> <li>• Will it avoid exacerbating the impacts of climate change?</li> <li>• Will it increase the proportion of energy both purchased and generated from renewable and low carbon resources?</li> <li>• Will it reduce the demand and need for energy?</li> <li>• Will it promote and improve energy efficiency?</li> <li>• Will it support community energy projects?</li> </ul>	Climatic Factors, Material Assets
<p><b>10. Water Quality &amp; Water Resources.</b> To protect and enhance London's waterbodies and the Blue Ribbon Network and help to ensure a sustainable and affordable supply of clean water.</p>	<ul style="list-style-type: none"> <li>• Will it improve the quality of waterbodies?</li> <li>• Will it reduce discharges to surface and ground waters?</li> <li>• Will it promote sustainable urban drainage?</li> <li>• Will it improve the water systems infrastructure (e.g. water supply/sewerage)?</li> <li>• Will it reduce abstraction from surface and ground water sources?</li> <li>• Will it reduce water consumption?</li> <li>• Will it help to meet the objectives of the Water Framework Directive?</li> </ul>	Water
<p><b>11. Waste.</b> To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.</p>	<ul style="list-style-type: none"> <li>• Will it help minimise the production of waste?</li> <li>• Will it help minimise resource use?</li> <li>• Will it promote reuse and recycling (e.g. in the design of buildings and spaces, etc)?</li> <li>• Will it enable the sorting and handling of waste and recyclable products?</li> <li>• Will it help to promote a market for recycled products?</li> <li>• Will it promote recovery from waste?</li> </ul>	Population, Material Assets
<p><b>12. Accessibility and Mobility.</b> To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).</p>	<ul style="list-style-type: none"> <li>• Will it encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing)?</li> <li>• Will it reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live?</li> <li>• Will it reduce traffic volumes and traffic congestion?</li> <li>• Will it reduce the length of commuting journeys?</li> <li>• Will it help to provide a more integrated transport service from start to finish (i.e. place of residence to point of service use or place of employment)?</li> <li>• Will it support an increase in the number of sub-regional and orbital public transport routes that facilitate locally based living?</li> <li>• Will it improve accessibility to work by public transport, walking and cycling?</li> <li>• Will it reduce road traffic accidents, especially involving cyclists?</li> <li>• Will it improve physical access to the transport system as well as buildings and spaces?</li> </ul>	Population



<p><b>13. Built and Historic Environment.</b> To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces are appropriately designed.</p>	<ul style="list-style-type: none"> <li>• Will it protect and enhance sites, features and areas of historical, archaeological and cultural value/potential, including their settings?</li> <li>• Will it conserve and enhance the townscape/cityscape character?</li> <li>• Will it promote high quality design and sustainable construction methods?</li> <li>• Will it respect visual amenity and the spatial diversity of communities?</li> <li>• Will it enhance the quality of the public realm?</li> <li>• Will it support and enhance heritage?</li> <li>• Will it improve the wider built environment and sense of place?</li> <li>• Will it conserve and enhance local character?</li> <li>• Will it protect important views across London?</li> <li>• Will it protect and enhance public spaces including historic parks and gardens?</li> </ul>	<p>Cultural Heritage (including architectural and archaeological heritage), Landscape</p>
<p><b>14. Liveability and Place.</b> To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.</p>	<ul style="list-style-type: none"> <li>• Will it create and sustain vibrant and diverse communities and encourage increased engagement in recreational, leisure and cultural activities?</li> <li>• Will it increase the provision of culture, leisure and recreational activities?</li> <li>• Will it support the provision of quality, affordable and healthy food?</li> <li>• Will it provide opportunities for people to choose an active, fulfilling life?</li> <li>• Will it increase the provision of key services, facilities and employment opportunities?</li> <li>• Will it positively enhance and promote the perceived sense of place held by the community?</li> <li>• Will it protect and enhance the provision of open space?</li> <li>• Will it help reduce actual levels of crime and antisocial behaviour?</li> <li>• Will it help reduce damage to the physical and natural environment?</li> <li>• Will it help reduce the perception of crime in an area?</li> <li>• Will it help reduce actual noise levels and disturbances from noise and other nuisance?</li> <li>• Will it protect and improve existing quality of life?</li> <li>• Will it help reduce the risk of terrorist attack?</li> </ul>	<p>Population, Human Health, Material Assets, Landscape, Cultural Heritage (including architectural and archaeological heritage)</p>
<p><b>15. Open Space.</b> To protect and enhance natural open space in London.</p>	<ul style="list-style-type: none"> <li>• Will it protect and enhance areas of open space?</li> <li>• Will it improve access to open space and improve the quality and quantity of publicly accessible greenspace?</li> <li>• Will it address areas with deficiencies of access to open space?</li> <li>• Will it promote an appropriate range and type of open space uses?</li> <li>• Will it increase Londoners access for recreation purposes?</li> <li>• Will it promote urban greening?</li> <li>• Will it promote and support the function of the Blue Ribbon Network?</li> </ul>	<p>Biodiversity, Flora, Fauna, Landscape</p>
<p><b>16. Air Quality.</b> To improve London's air quality.</p>	<ul style="list-style-type: none"> <li>• Will it improve air quality?</li> <li>• Will it reduce exposure to poor air quality?</li> <li>• Will it reduce emissions of greenhouse gases?</li> <li>• Will it help to reduce emissions of PM10 and NO2?</li> <li>• Will it reduce emissions of ozone depleting substances?</li> <li>• Will it help to achieve national and international standards for air quality (for example, those set out in the Air Quality Regulations 2010)?</li> </ul>	<p>Air</p>

## Options and alternatives

- 3.12 As part of the assessment process a preferred option as well as reasonable alternatives are to be developed and appraised. One option available to the Mayor is the 'do-nothing' option. This option would leave the London Plan unchanged. However, any more recently published Government guidance or policy would have to be considered when the decision maker determines a planning application. The original car parking

policy was assessed as part of the IIA's undertaken for the full London Plan review (October 2009). The existing amended residential car parking policy was re-assessed during the development of the Further Alterations to the London Plan (December 2013) which highlighted the flexibility in the existing car parking standards, especially for Outer London.

#### Policy options

3.13 Policy options were developed taking into account national policy, the London baseline, and specifically that for outer London as well as the OLC Report.

- **Do not** update the London Plan; and
- **Include** a policy alteration
  - Allow/encourage more flexibility in PTALs 0-1 in outer London (preferred option)
  - Allow/encourage more flexibility in more PTAL areas such as 0-2/3 in outer London

3.14 The appraisal will use the following scoring system.

**Table 3.2 Scoring System used in IIA**

Score	Symbol	Comments
<b>Major positive effect</b>	<b>++</b>	The alterations contribute <b>significantly</b> to the achievement of the objective
<b>Minor positive effect</b>	<b>+</b>	The alterations contribute to the achievement of the objective, but not significantly
<b>No effects</b>	<b>0</b>	The alterations do not have any effect on the achievement of the objective
<b>Minor negative effect</b>	<b>-</b>	The alterations detract from the achievement of the objective, but not significantly
<b>Major negative effect</b>	<b>--</b>	The alterations detract <b>significantly</b> from the achievement of the objective
<b>Uncertain effect</b>	<b>?</b>	The alterations have an uncertain effect on the achievement of the objective
Note: Effects may be scored as uncertain if there is insufficient information available to determine a score. Some policies may also have both positive and negative effects on the objective, and where this is the case an explanation is provided.		

#### Habitats Directive Screening Assessment

3.15 Authorities are also required to assess the effects of land use plans on European sites of nature conservation to determine whether there will be any 'likely significant effects' on these sites as a result of the plan's implementation or in combination with other plans

and projects. A Habitats Regulations Screening Assessment has been prepared and will be published alongside the Parking Standards MALP and this IIA. The Screening Assessment concluded that there is likely to be some minor negative effects on air quality in outer London, but the whether this has any effect on European sites is unknown. It will be dependent on the implementation of this policy by local authorities as well as the specific location of development, the number of car parking space provided, the nature of the occupants and any mitigation measures included. Assessment of specific affects will be carried out at the lower tier level. Given the limited scope of the proposed change and with the implementation of wider London Plan policies the potential likely impacts are unlikely to be significant.

- 3.16 It is assumed that all relevant legal requirements will be met as necessary and as such specific reference to compliance with statutory limits and targets has not been made in the assessment or the sustainability objective.

#### 4. Assessment of proposed alteration – Parking

##### Background

- 4.1 The Government has recently published several policy statements that support a flexible approach to car parking. These are highlighted in Table 1 – section 4 of the Parking Standards MALP IIA Scoping Report (attached as Appendix 2). In addition to these policy documents, in his statement on 25<sup>th</sup> March 2015, the Secretary of State amended the National Planning Policy Framework to state:
- ‘Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network’*
- 4.2 In the FALP published in March 2015, the Mayor recognised the opportunity to adopt a more flexible approach to car parking in outer London, but stated that there are sound reasons for retaining residential car parking standards in core and inner London. Therefore the scope of this alteration is limited to residential car parking standards in outer London.
- 4.3 It is proposed to alter policy 6.13 – Parking and its addendum on car parking standards in order to reflect national policy by liberalising car parking standards. The scope for the alterations has been limited to residential parking standards in low PTAL areas in outer London.
- 4.4 The development of the policy alterations was informed by a series of meeting and public events convened through the Outer London Commission (OLC). The OLC has produced a report<sup>4</sup> which outlines the latest evidence on various social, economic and environmental drivers and the implications relating to the provision of residential car parking in outer London. This includes evidence gathered by TfL, which was outlined in the IIA Scoping report. The OLC report also summaries the views expressed at the series of public meetings. A list of the events is contained in the report.
- 4.5 The OLC report and the recent TfL evidence, in addition to that outlined in the previous scoping reports have informed the Sustainability Appraisal and Assessment set out later in this section. Some of the key facts are outlined below.

##### Baseline data

- 4.6 By 2050 London’s population is expected to be about 11.27 million people, over 3.1 million more than today with around 1.4 million new jobs<sup>5</sup>. The growth of London will lead to more journeys being made in the Capital every day, with 27 million journeys expected to be made across the network on a daily basis by 2031<sup>6</sup>. The demand for public transport has increased over the past 15 years or so, while road traffic levels have been falling in London. It is likely that this trend will continue under the Mayor’s current policies to support public transport and other forms of sustainable transport. However, the extent to which this model shift will continue is uncertain.

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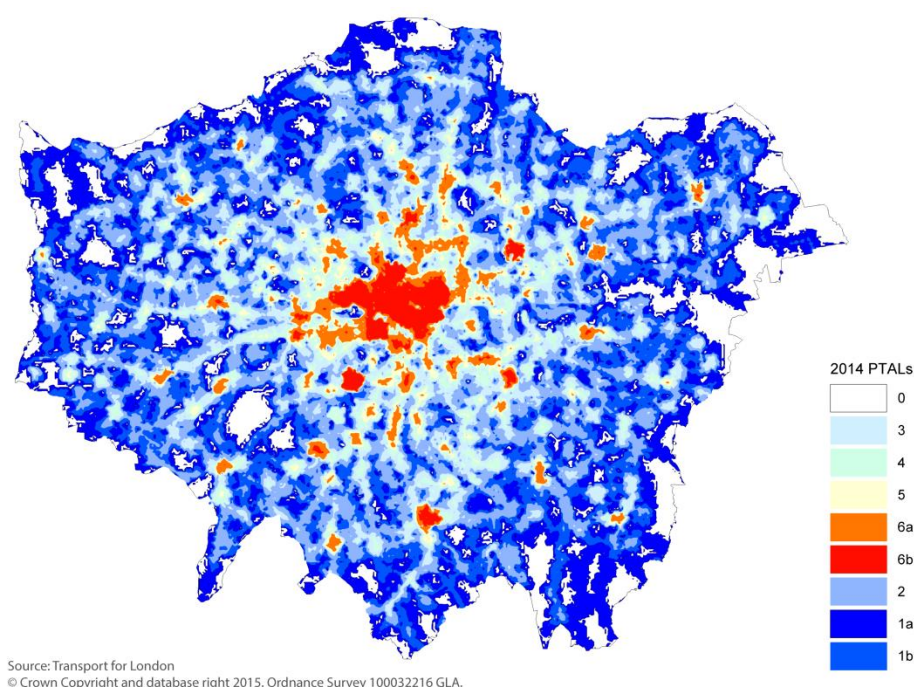
<sup>4</sup> Outer London Commission – 4<sup>th</sup> Report <http://www.london.gov.uk/>

<sup>5</sup> London 2050 Infrastructure Plan

<sup>6</sup> TfL (2012) *Residential Parking Provision in New Developments: Travel in London Research Report*. London: TfL

- 4.7 Average car ownership levels in London are much lower than rest of the country, yet the importance of access by car varies within London. For instance, 38 per cent of residents in outer London travel to work by car (and 42 per cent by public transport), compared to 14 per cent travelling by car (and 57 per cent by public transport) in inner London and 62 per cent travelling by car (and 13 per cent by public transport) in the south east<sup>7</sup>. In outer London poorer access to public transport, often longer distances to travel and more complex trip combinations means car dependency is much higher than elsewhere in London. However, in outer London access to public transport is variable, with some locations, typically town centres with train or tube stations having very high levels of public transport connectivity. See the Public Transport Accessibility Levels (PTAL) map below.

**Figure 6. Public Transport Accessibility Levels**



- 4.8 TfL's Residential Parking in New Development<sup>8</sup> report highlights a number of factors that influence whether or not a household is likely to own a car. These factors include tenure, housing type, household structure, nationality, working status, connectivity to public transport, access to employment and services, level of parking provision and control, and car club membership. Overall TfL's research indicates that car ownership rises where public transport accessibility decreases; household income rises; the number of adults in the household increases and, in Outer London, where there are children in the household; or there are more home owners than renters, particularly those living in social housing.
- 4.9 However, whether car ownership influences car use is disputed. Two case studies<sup>9</sup> by Berkley Homes suggest no relationship between the two. However the scope of the case

<sup>7</sup> 2011 Census

<sup>8</sup> <https://www.tfl.gov.uk/cdn/static/cms/documents/residential-parking-provision-new-development.pdf>

<sup>9</sup> The Berkeley Group (2011) *Does car ownership increase car usage?* London: The Berkeley Group  
The Berkeley Group (2014) *Does car ownership increase car usage?* London: The Berkeley Group

studies was limited. Evidence from TfL and others paints a complex picture. The Roads Task Force (RTF) Technical Report 14 found that only one in five car trips in London are actually for work purposes, with more trips on Saturdays and Sundays than during the week. The peak periods for car trips are the inter-peak (10am-4pm) and evening peak (4pm-7pm)<sup>10</sup>.

- 4.10 The level of car use plays an important factor in environmental quality, local amenity, local road safety and health. Air quality in outer London is generally better than that in inner London, except along major roads. The Mayor has programmes in place aimed at improving air pollution, including that generated from vehicles that will continue to improve air quality across London. London's European sites of nature conservation are located in outer London, generally in low PTAL areas. There are also several European sites just beyond London's boundary. More detail on these sites can be found in the Parking Standards MALP Habitats Screening Assessment.

### **Sustainability appraisal**

- 4.11 Table 4.1 below outlines the preferred options and their background as well as the alternative options. Below is the appraisal of the proposed policies, which include amendments following the responses received during the consultation of the initial scoping report. Alongside is the appraisal of the alternative options. The alternative options are based on reasonable and realistic alternatives and therefore are limited by the scope of the proposed alteration.
- 4.12 It should be noted that the preferred policy outlined below will be subject to consultation and an Examination in Public. Any recommended changes during the consultation period or by the Inspector that are accepted by the Mayor will be scoped for their potential significant impact and therefore requirement for further sustainability appraisal.

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<sup>10</sup> RTF (2013) Roads Task Force – *Technical Note 14: Who travels by car in London and for what purpose?* London: Transport for London.

**Table 4.1 - Sustainability Appraisal**

Policies to be altered	Policy 6.13 Parking		
Sustainability Objectives	<b>Key Policy documents</b>  Department for Communities and Local Government and Eric Pickles Written Statement to Parliament Planning update March 2015 25th March 2015  National Planning Policy Framework		
	Preferred option	Alternative option	Alternative option
	<b>Amend the residential car parking policy to enable a more flexible approach in areas of PTALs 0-1.</b>	<b>Amend the car parking policy to enable a more flexible approach in areas of PTALs 0-2/3 in Outer London.</b>	<b>Not update the car parking policies<sup>11</sup></b>
<b>1. Regeneration &amp; Land-Use</b>	<p>This approach will support accessibility in areas of low PTAL and therefore is likely to become more attractive areas to live, especially for those that need a car. It is likely to improve viability for housing developers in these parts of London. Development is generally likely to be low density and limited in numbers, and in line with London Plan policy, on brownfield sites.</p> <p>This approach should be monitored to ensure the land take for car parking has no significant effect on the quantum of development delivered.</p> <p><b>Minor positive effect</b></p>	<p>As for the preferred option, this approach will also improve accessibility in areas which already have some good levels of public transport. This approach may improve viability for housing deliverability, improving regeneration, but the additional land take for car parking could limit the overall amount of development.</p> <p><b>Minor positive effect/minor negative effect.</b></p>	<p>This option will not increase accessibility in areas with low PTAL in outer London. Poor accessibility will not create such a “sense of place and vibrancy”.</p> <p><b>Minor negative effect.</b></p>
<b>2. Biodiversity</b>	<p>Housing development in low PTAL areas in outer London is likely to be low density with car parking at street level. Therefore additional off-street car parking is likely to require a greater land take, leaving less space for the retention or provision of habitats and biodiversity. In addition the pollution generated from any additional car use will have a negative effect on biodiversity.</p>	<p>Housing development in areas up to PTAL 2/3 are likely to be low density with car parking at street level. Therefore additional car parking is likely to require a greater land take, leaving less room for the retention or provision of habitats and biodiversity. In addition the pollution generated from any additional car use will have a negative effect on biodiversity. As this approach covers a wider area than the preferred option the impact on biodiversity will</p>	<p><b>No effects</b> on the objective are anticipated from this option.</p>

<sup>11</sup> Generally taken from the IIA for the FALP with the appraisal amended to limit to scope to residential development

	<b>Minor negative effect.</b>	be greater. <b>Negative effect.</b>	
<b>3. Health and Well-being</b>	<p>The increased provision in car parking is likely to result in at least some additional car journeys and less walking and cycling by occupants, although the extent is uncertain. The modelling – assuming similar patterns of travel for new developments – suggests the increase in car trips over 24hrs would be c0.8% and the decrease in walking/cycling and PT would both be 0.3% (-0.6% total). These are marginal changes.</p> <p>In addition, as housing will generally be low density, the number of additional homes and therefore car journeys will be relatively minor. This option would support those already with health issues that are less mobile. It will help social inclusion and mental health. However, this approach will have to be monitored to ensure existing and future planned provision is not undermined for those who cannot drive. Additional trips can lead to increased air pollution. There are wider policies to support cycling and the provision of low emission vehicles which would improve health and well-being.</p> <p><b>Minor positive effect / Minor negative effect.</b></p>	<p>The increased provision in car parking is likely to result in some additional car journeys and less walking and cycling by occupants, although the extent is unknown. As this option would apply to more developments it would have slightly more negative impact than the preferred option. This option would support those already with health issues that are less mobile. Additional trips can lead to increased air pollution. There are wider policies to support cycling and the provision of low emission vehicles which would improve health and well-being.</p> <p><b>Minor positive effect / Negative effect.</b></p>	<p>This option could be beneficial in that it would encourage people to walk or cycle. In addition, there is less likely to be fewer health implications from poor air quality. However, this option does not support those with mobility issues.</p> <p><b>Minor positive effect/minor negative effect.</b></p>
<b>4. Equalities</b>	<p>This option is likely to support those with mobility issues and caring responsibilities, such as those with disabilities or children and older people. It is likely to help decrease social exclusion. Whilst there are policies in the plan supporting the provision of disabled spaces, this approach is more likely to support a wider group of people with protected characteristics. However, the actual numbers will be limited as the overall delivery of housing in these areas is limited. This option will need to be monitored to ensure it does not displace or delay the bringing forward of transport</p>	<p>This option is likely to support those with mobility issues and caring responsibilities, such as those with disabilities or children and older people to a greater extent than the preferred option. It is likely to help decrease social exclusion. Whilst there are policies in the plan supporting the provision of disabled spaces, this approach is more likely to support a wider group of people with protected characteristics.</p> <p><b>Minor positive effect</b></p>	<p>This option is less likely to support those with mobility issues such as older and disabled people who drive and cannot travel by public transport. The option does not address issues of social exclusion. The option is less likely to support those who may be required to drive for work and for those who need to travel at night when public transport is not an option.</p> <p><b>Minor negative effect.</b></p>



	<p>infrastructure for those who cannot drive.</p> <p><b>Minor positive effect</b></p>		
<b>5. Housing</b>	<p>This approach is more likely to support the provision of housing in low PTAL areas by ensuring they are accessible for residents and provide a sense of security through the provision of well-designed car parking spaces. This option is likely to improve viability for housing developers in these parts of London. Development is likely to be low density so the amount of additional housing delivered is likely to be limited.</p> <p><b>Minor positive effect</b></p>	<p>This approach will also improve accessibility in areas which already have some good levels of public transport. This approach may improve viability for housing deliverability, but the additional land take for car parking could limit the overall amount of housing delivered.</p> <p><b>Minor positive effect / minor negative effect.</b></p>	<p>This option is less likely to support the delivery of housing in low PTAL areas.</p> <p><b>Minor negative effect.</b></p>
<b>6. Employment</b>	<p>This approach is more likely to support housing choice for those who need a vehicle for work. It is also more likely to support a wider range of employment choice for workers living in low PTAL areas as they can access areas not serviced by public transport for work.</p> <p><b>Positive effect</b></p>	<p>This approach is more likely to support housing choice for those who need a vehicle for work. It is also more likely to support a wider range of employment choice for workers living in low to medium PTAL areas as they can access areas not serviced by public transport for work. This approach is also more likely that the preferred option to support business located in areas with limited public transport.</p> <p><b>Positive effect</b></p>	<p>This option does not support people who would require a vehicle for work. Furthermore, it does not provide better connectivity and thus decreases employment options for those in low PTAL areas.</p> <p>The option does not help to enhance Outer London's attractiveness as an office location and is unlikely to increase employment opportunities outside of Central London.</p> <p><b>Minor negative effect.</b></p>
<b>7. Stable Economy</b>	<p>This approach is more likely to support people who need a vehicle for work. It is also more likely to support a greater range of employment choices and locations for workers living in low PTAL areas as they can access areas not serviced by public transport for work. Therefore it is more likely to support a range of employment options in low PTAL areas and generally outer London locations. This approach is also more likely to support business located in areas with limited public transport.</p> <p><b>Minor positive effect</b></p>	<p>This approach is more likely to support housing choice for those who need a vehicle for work. It is also more likely to support a greater range of employment choices and locations for workers living in low PTAL areas as they can access areas not serviced by public transport for work. Therefore it is more likely to support a range of employment options in low PTAL and generally outer London locations. This approach is also more likely than the preferred option to support business located in areas with limited public transport.</p> <p>However, as this approach allows more flexibility in slightly more dense areas there is greater potential for road</p>	<p>This option is less likely to support town centres and offices in Outer London as they are not easily accessed by car by those who live relatively close. Consequently, local businesses will find it harder to survive and business start-ups will not be encouraged.</p> <p><b>Minor negative effect.</b></p>

		congestion which has a negative impact on the economy. <b>Positive effect/minor negative effect.</b>	
<b>8. Flood risk and Climate Change Adaptation</b>	Housing development in low PTAL areas is likely to be low density with car parking at street level. Therefore additional car parking is likely to require a greater land take, leaving less room for the retention vegetation. Car parking is still generally hard stand and therefore can contribute to flood risk and the urban heat island effect. Whilst there are wider policies in the plan to mitigate urban run-off these measures require long term maintenance. <b>Minor negative effect.</b>	Housing developments in areas of up to PTAL 2/3 are generally likely to be low density with car parking at street level. Therefore additional car parking is likely to require a greater land take, leaving less room for the retention vegetation. Car parking is still generally hard stand and therefore can contribute to flood risk and the urban heat island effect. Whilst there are wider policies in the plan to mitigate urban run-off these measures require long term maintenance. <b>Negative effect.</b>	<b>No effects</b> on the objective are anticipated from this option.
<b>9. Climate Change Mitigation and Energy</b>	The increased provision in car parking is likely to result in some additional car journeys, although the extent is uncertain. However as outlined in health and well-being the evidence suggests the effect will be marginal. The limited increased use of fuel and congestion is likely to produce marginal additional greenhouse gases. <b>Minor negative effect.</b>	This approach is likely to result in additional car journeys, than the preferred option, although the extent is uncertain. The increased use of fuel and congestion is likely to produce additional greenhouse gases. <b>Negative effect.</b>	This option will encourage other more sustainable forms of transport such as walking, cycling or public transport. With fewer private vehicles on London's roads, contribution to greenhouse gases will reduce. <b>Minor positive effect.</b>
<b>10. Water Quality &amp; Water Resources</b>	This approach is likely to result in some additional car journeys, although the extent is uncertain. As outlined in above the evidence suggests the effect will be marginal. Therefore the resulting additional particulates generated which can be washed into waterways will be limited. Whilst there are wider policies in the plan to mitigate urban run-off these measures require long term maintenance. <b>Minor negative effect.</b>	This approach is likely to result in additional car journeys, than the preferred option, although the extent is uncertain but likely to be marginal. This is likely to result in the generation of additional particulates which can be washed into waterways. Whilst there are wider policies in the plan to mitigate urban run-off these measures require long term maintenance. <b>Negative effect.</b>	<b>No effects</b> on the objective are anticipated from this option.
<b>11. Waste</b>	<b>No effects</b> on the objective are anticipated from this option.	<b>No effects</b> on the objective are anticipated from this option.	<b>No effects</b> on the objective are anticipated from this option.
<b>12. Accessibility and</b>	This option is more likely to support the mobility element of this objective, especially for	This option is more likely to support the mobility element of this objective, especially for	Whilst this option could encourage a shift to more sustainable forms of travel and

<b>Mobility</b>	<p>those with disabilities or with children or need a vehicle for work. However, it may result in the use of a private vehicle being the most convenient and therefore the preferred mode of travel compared to cycling and walking. This could lead to congestion in the local and wider area. This option will need to be monitored to ensure it does not displace or delay the bringing forward of transport infrastructure for those who cannot drive.</p> <p><b>Positive effect / Minor negative effect.</b></p>	<p>those with disabilities or with children or need a vehicle for work. However, it may result in the use of a private vehicle being the most convenient and therefore the preferred mode of travel compared to cycling and walking, even in areas with a better provision of public transport than the preferred option. In more dense areas this option could contribute to any existing road congestion.</p> <p><b>Positive effect / Minor negative effect.</b></p>	<p>prevent the problems associated with traffic congestion, it does not support those with mobility issues.</p> <p><b>Minor positive/negative effect.</b></p>
<b>13. Built and Historic Environment</b>	<p>The potential provision of additional car parking spaces will have an impact on the layout and design of housing. Housing in low PTAL areas is likely to be low density, with sufficient space for additional car parking at street level. It is likely any increased car parking standard will be designed into schemes and limit ad hoc parking in the street or elsewhere. There are wider policies in the Plan to promote good design and the creation of a sense of place. This approach should address overspill parking and the blight it can cause.</p> <p><b>Minor positive effect.</b></p>	<p>The provision of additional car parking spaces will have an impact on the layout and design of housing. Housing in areas up to PTAL 3 is generally likely to be low density, with sufficient space for additional car parking at street level. In more dense areas it will be important that the car parking provision doesn't create dislocated buildings from the street. It is likely any increased standard will be designed into schemes and limit ad hoc parking in the street or elsewhere. There are wider policies in the Plan to promote good design and the creation of a sense of place. This approach should address overspill parking and the blight it can cause.</p> <p><b>Minor positive effect/ Minor negative effect.</b></p>	<p><b>No effects</b> on the objective are anticipated from this option.</p>
<b>14. Liveability and Place</b>	<p>The provision of additional car parking spaces will have an impact on the layout and design of housing. Housing in low PTAL areas is likely to be low density, with sufficient space for additional car parking at street level. However it will be important to ensure the parking provision is designed to ensure the safety of occupants and vehicles and not to result in buildings dislocated from the street and adjoining buildings. There are wider policies in the Plan to promote good design and the creation of a sense of</p>	<p>The provision of additional car parking spaces will have an impact on the layout and design of housing. Housing in low PTAL areas is likely to be low density, with sufficient space for additional car parking at street level. However it will be important to ensure the parking provision is designed to ensure the safety of occupants and vehicles and not to result in buildings dislocated from the street and adjoining buildings. There are wider policies in the Plan to promote good design and the creation of a sense of place. In more dense areas this option could contribute to any</p>	<p>This option is likely to discourage the additional use of private vehicles and, in turn, reduce congestion resulting in a better local environment and public realm. On the other hand, the option bears on the rights of an individual to own a car and may not promote a perceived sense of place held by the community.</p> <p><b>Minor positive effect / minor negative effect.</b></p>

	place. <b>Minor positive effect.</b>	existing road congestion detracting from the sense of place. <b>Minor positive effect / minor negative effect.</b>	
<b>15. Open Space</b>	Housing development in low PTAL areas is likely to be low density with car parking at street level. Therefore additional car parking is likely to require a greater land take, leaving less room for the retention or provision of open space. <b>Minor negative effect.</b>	Housing developments in areas up to PTAL 3 are likely to be lower density with car parking at street level. Therefore additional car parking is likely to require a greater land take, leaving less room for the retention or provision of open space. PTAL 2/3 areas are likely to be more dense and therefore have less open space than PTAL 0 and 1 areas, therefore the need for open space is greater so this approach would have a more significant impact on this objective. <b>Negative effect.</b>	This option will protect and enhance areas of open spaces by reducing the land take for car parking. However, the option does not act to improve accessibility to these open spaces. <b>Minor positive effect / minor negative effect.</b>
<b>16. Air Quality</b>	The increased provision in car parking is likely to result in additional car journeys, although the extent is uncertain. The evidence suggests a marginal increase. Additional trips can lead to increased air pollution. However as housing will generally be low density, the number of additional homes and therefore car journeys will be relatively minor. In addition, there are wider policies to support alternative forms of travel, including cycling through the Mayor's mini-Hollands and low emission vehicles. <b>Minor negative effect.</b>	The increased provision in car parking is likely to result in at least some additional car journeys, although the extent is uncertain. The evidence suggests a marginal increase. Additional trips can lead to increased air pollution. There are wider policies to support alternative forms of travel, including cycling through the Mayor's mini-Hollands and low emission vehicles. <b>Negative effect.</b>	This option will continue to encourage travel by more sustainable forms of transport. This will reduce traffic emissions and improve air quality. <b>Minor positive effect.</b>

## Summary

- 4.13 The Sustainability Appraisal suggests that generally there will be minor negative impacts on the natural environment due to the preferred option. This is due to a likely increase in pollution, and hardstand that limits the potential for open space and biodiversity and increases surface water run-off and the urban heat island effect. The alternative option would be likely to have a greater negative impact on the environment if implemented. However, the social benefits of the preferred option are positive especially for those who need a car for work, those with disabilities and children and the elderly and therefore the preferred option would support those with protected characteristics more than the existing approach. It is likely the preferred approach will have a negative effect on health due to the likely increase in air pollution and a decrease in walking and

cycling. The preferred approach is considered to have a neutral effect on community safety, subject to good design. The 'do nothing' approach has no effect on many of the environmental objectives, which also reflects the FALP appraisal, but a negative effect on the social objectives.

- 4.14 It should be noted that this policy alteration will not be applied in isolation and wider social, environmental, economic, health and safety issues will be considered through the application of the London Plan as a whole. In addition, the number of homes delivered in low PTAL areas, especially in Outer London is only a small proportion of overall housing delivery across London and therefore the impacts of this alteration on London as a whole will generally be minor. However, locally the effects could be felt more strongly, especially if there is some traffic congestion. This may affect how the outer London boroughs choose to apply the policy which will determine the overall impact of the proposed Parking Standards MALP on the sustainability objective.

## **5. Monitoring**

- 5.1 If approved, the effects of the proposed Parking Standards MALP will be monitored via the London Plan Annual Monitoring Report. Key Performance Indicators (KPIs) 13-15 dealing with reducing reliance on the private car and increasing use of more sustainable modes will be the most relevant to this proposed alteration. However, the KPIS on density of development (2), housing supply (4) and health inequalities (6) will also be relevant. Transport for London also produces a wide range of annual statistics and reports that can be used for monitoring purposes. The GLA and other Government Department monitor wider social and environmental performances including on air quality and flooding.
- 5.2 It is recommended the Parking Standards MALP are monitored for their impact on housing delivery, the number of spaces provided and potential effects on the delivery of public transport.

## **6. Conclusions**

- 6.1 Table 6.1 below presents a summary of the effects of the policy changes against each of the IIA objectives for the preferred option. The qualitative scoring system used to assess the likely effects is shown in the key. To enable complete assessment of the potential effects, the assessment for the preferred options of the MALP (Housing and Energy) have been included to assess the overall impacts of both alterations.

**Table 6.1 – Appraisal Table of Options**

Key Area	1. Regeneration & Land-Use	2. Biodiversity	3. Health and Well-being	4. Equalities	5. Housing	6. Employment	7. Stable Economy	8. Flood Risk and Climate Change Adaptation	9. Climate Change Mitigation and Energy	10. Water Quality & Water Resources	11. Waste	12. Accessibility and Mobility	13. Built and Historic Environment	14. Liveability and Place	15. Open Space	16. Air Quality
<b>Parking Policy (preferred option)</b>	+	-	+/-	+	+	++	+	-	-	-	0	++/-	+	+	-	-
<b>Parking Policy (extend to PTAL 2/3)</b>	+/-	--	+/-	+	+/-	++	++/-	--	--	--	0	++/-	+/-	+/-	--	--
<b>Parking Policy (no change)</b>	-	0	+/-	+/-	-	-	-	0	+	0	0	+/-	0	+/-	+/-	+

Key	Description
++	The policy is likely to contribute significantly towards the IIA objective.
+	The policy is likely to contribute positively towards the IIA objective, although not significantly.
0	The policy is considered to have no significant positive or negative effect.
-	The policy is likely to detract from the achievement of the IIA objective, although not significantly.
--	The policy is likely to detract significantly from the achievement of the IIA objective.
?	The policy has an uncertain relationship to the IIA objective or is dependent on the way in which the policy is implemented. Alternatively, insufficient information may be available to enable an assessment to be made.
~	There is no relationship between the policy and the IIA objective.

### Cumulative Effects

6.2 It is likely that this policy change will lead to a number of cumulative effects across London which could include:

- a) More vehicle movements with associated economic and environmental dis-benefits;

### Key findings from the IIA

6.3 Overall the assessment of the proposed Parking Standards MALP is that it will have both positive and negative effects. They include social benefits including for those with protected characteristics and for employment choice. The impact on the economy is likely to generally be positive except in areas already suffering transport congestion. The

impact on the environment is generally likely to be negative, however this could be partially mitigated through the implementation of wider London Plan policies.

## Appendix 1 - Key evidence and baseline data

<b>Car parking</b>
Residential parking provision in new developments. Transport for London, 2012.
Census 2011 data – Journey Purpose by mode; Car and van availability
London Development Database – monitors the number of car parking spaces approved within developments
Does car ownership increase car use? A study of the use of car parking within residential schemes in London Commissioned by the Berkeley Group. WSP
Improving the health of Londoners – Transport Action Plan - <a href="https://www.tfl.gov.uk/cdn/static/cms/documents/improving-the-health-of-londoners-transport-action-plan.pdf">https://www.tfl.gov.uk/cdn/static/cms/documents/improving-the-health-of-londoners-transport-action-plan.pdf</a>
Baseline air quality data <a href="http://www.londonair.org.uk/LondonAir/Default.aspx">http://www.londonair.org.uk/LondonAir/Default.aspx</a>
Baseline air quality data <a href="http://uk-air.defra.gov.uk/latest/currentlevels">http://uk-air.defra.gov.uk/latest/currentlevels</a>
Noise maps <a href="http://services.defra.gov.uk/wps/portal/noise/maps">http://services.defra.gov.uk/wps/portal/noise/maps</a>
Roads Task Force technical reports, 2013
Travel in London reports 1-7. Mayor of London and Transport for London, 2009 to 2014
LDD academic study on impact of maximums on number of spaces being delivered
Outer London Commission - 4 <sup>th</sup> Report
TfL modelling and residential parking survey data



## Appendix 2

### **Integrated Impact Assessment (IIA) of the Minor Alterations (Residential Parking Standards in outer London) to the London Plan: A Scoping Request**

#### **1 Introduction / Background**

- 1.1 In 2012, the Government published its National Planning Policy Framework (NPPF), which simplified national policy. In 2014, it published the supporting National Planning Practice Guidance (NPPG). The NPPF replaced previous national policy that discouraged the use of minimum car parking standards in residential development and discouraged the provision of more than 1.5 off-street car parking spaces per dwelling. The current national planning policy and guidance particularly support policy set locally that are deemed appropriate in light of local circumstances.
- 1.2 The government has also published other consultations and policy statements that support a flexible approach to car parking. These documents promote sustainable forms of transport and a reduction in the use of high emissions vehicles whilst also seeking to support the High Street and give people choice in modes of travel. A list of these documents is provided in Table 1 below.
- 1.3 To bring the London Plan in line with the NPPF the London Plan was altered through the Further Alterations to the London Plan (FALP) to highlight the flexibility in the Mayor's car parking standards.
- 1.4 In his response to the draft FALP, the Parliamentary Under Secretary of State (Planning) raised concern that:

‘the approach to the provision of parking spaces for new development set out in the Plan at present does not reflect national policy. This government abolished national planning policy guidance that required councils to limit car parking provision for new residential development in 2011. These policies unfairly penalized drivers and could lead to poor quality development and congested streets. The government believes that local authorities are best placed to ensure parking provision is appropriate to the needs of the proposed development. We would expect the London Plan to reflect this. If local authorities consider parking standards to be necessary the National Planning Policy Framework sets out the issues they should take into account when setting standards.’
- 1.5 However, the EiP Inspector's Report on the FALP stated:

‘I consider that the Mayor's encouragement to a restraint based approach to parking provision in inner London and other locations which benefit from good access to public transport to be justified (FSC 6.15). The further alterations Policy 6.13(E)(d) and paragraph 6.45 recognise the need for flexibility in town centres and will allow London Boroughs to tailor standards to their areas as appropriate. Consequently, I find that the FALP is flexible and strikes an appropriate balance.’
- 1.6 To enable the full consideration of the Government's response, the Mayor included a commitment to ‘give active consideration to addressing changes to national policy on car parking should Government bring these forward’ in his ‘Intend to publish’ version of the FALP.

- 1.7 In his response to the Mayor's 'Intend to publish' version of the FALP dated 27<sup>th</sup> January 2015, the Minister of State for Housing and Planning maintained his support for the provision of more parking spaces alongside new homes, especially where the access to public transport remains low. He welcomed the Mayor's clear commitment in the London Plan to carrying out an early review of parking standards in Outer London.
- 1.8 A second letter of the same date from the Minister highlights the parking policy set out in the NPPF and the guidance in the NPPG and welcomes the reconvening of the Mayor's Outer London Commission to advise on planning policy on parking.
- 1.9 As this proposed minor alteration has a specific scope and a different background it is being brought forward separate to the draft Minor Alterations to the London Plan (MALP) on Housing Standards and climate change. The IIA Scoping Report for the proposed MALP was issued to the statutory consultees for their comment in October 2014.
- 1.10 Given the specific scope of this proposed alteration and that a detailed IIA Scoping Report was recently carried out for the FALP, it is considered appropriate that this Scoping Report provides a brief outline of the proposed area of policy to be altered and updates any relevant baseline data and programmes, reports and strategies. The methodology for the full IIA will follow that of the London Plan 2011 and its alterations. For completeness please also refer to the full IIA for the draft FALP which can be found under the title Impact Assessment here - <https://www.london.gov.uk/priorities/planning/london-plan/draft-further-alterations-to-the-london-plan>

## **2 Overview of the Minor Alterations (Parking Standards) to the London Plan**

- 2.1 The proposed Minor Alterations on residential parking standards will look to provide further flexibility and/or further guidance, in line with the NPPF, to the residential car parking standards in outer London. At this stage further evidence is being gathered to inform the preferred policy approach which will need to consider national policy and wider environmental, social and economic aspects specific to London.

## **3 Approach to the IIA**

- 3.1 The proposed Minor Alterations on residential parking standards in outer London are a small element of the London Plan. They will not alter the geographic or temporal framework of the wider London Plan and therefore they will be assessed using the same IIA methodology that was set out in the Scoping Report for the London Plan 2011 and its three subsequent alterations. These proposed alterations will have a spatial dimension with a focus on outer London. The proposed policy alterations will be assessed against the IIA Objectives.
- 3.2 The main updates to the IIA will include:
- a focus solely on residential car parking standards in outer London,
  - a review of the relevant plans, programmes and strategies. These are set out in Table 1 below.
  - a review of the relevant datasets and baseline information. This is set out in Table 2 below.

- 3.3 Policy options will be developed based on these key documents, data and evidence. These will be tested against the Key Sustainability Objectives which are set out in Section 6 below.
- 3.4 The findings of the IIA will be presented in a full report that will go out for consultation alongside the proposed Minor Alteration on residential parking standards in Outer London from May 2015.

## 4 Review of Plans, Programmes and Strategies

- 4.1 A review of the documents including Plans, Programmes and Strategies relevant to residential car parking published since the London Plan and the FALP IIAs has been undertaken. Documents reviewed include those specifically on car parking, but also on its wider potential impacts such as on design, noise, air quality and liveability. In addition to the documents identified in the IIA Scoping Report for the draft FALP (specifically see pages 34-35), Table 1 below lists the most recent additional relevant documents.

**Table 1 – Documents including Plans, Programmes and Strategies relevant to car parking<sup>12</sup>**

Car parking
<ul style="list-style-type: none"> <li>• Brandon Lewis MP, Minister of State for Housing and Planning, Letter to Mayor of London Boris Johnson (FALP – publication), 27 January 2015</li> <li>• Brandon Lewis MP, Minister of State for Housing and Planning, Letter to Mayor of London Boris Johnson (FALP – car parking), 27 January 2015</li> <li>• Brandon Lewis MP, Minister of State for Housing and Planning, Letter to Mr Thickett, 10 September 2014</li> <li>• Nick Boles, Parliamentary Under Secretary of State (Planning), Letter to Mr Johnson, 11 April 2014</li> <li>• More parking for new homes will end ‘vicious cycle of clogged up streets’, Rt Hon Eric Pickles MP &amp; Department for Communities and Local Government (DCLG), 26 August 2014</li> <li>• Technical consultation on planning, DCLG, 2014.</li> <li>• Consultation on Local Authority Parking, Department of Transport, 2013</li> <li>• Response to the Consultation on Local Authority Parking, Department of Transport, 2014</li> <li>• The Right to Challenge Parking Policies. A Discussion Paper, DCLG, 2014</li> <li>• Space to park, Arts and Humanities Research Council, home improvements, URBED, the University of Edinburgh, Design for Homes, art one zero.</li> <li>• Better streets Delivered. Transport for London, 2013</li> <li>• The vision and direction for London’s streets and roads. The Roads Task Force, 2013</li> <li>• The Roads Task Force Update report. Mayor of London and Transport for London, 2014</li> </ul>

<sup>12</sup> For a list of further documents refer to the IIA Scoping Reports for FALP, REMA and the London Plan 2011.

## 5 Review of the Baseline Information, Key Issues and indicators

- 5.1 A review of the baseline sources that are relevant to residential car parking has been undertaken. Document reviewed include those specifically on car parking, but also on its wider potential impacts such as on design, health, noise and air quality. In addition to the data identified in the IIA Scoping Report for the FALP (specifically see pages 34-36 and section 5.6 and 5.7). Table 2 below lists the most recent versions of the baseline sources.

<b>Car parking</b>
Residential parking provision in new developments. Transport for London, 2012.
Census 2011 data – Journey Purpose by mode; Car and van availability
London Development Database – monitors the number of car parking spaces approved within developments
Does car ownership increase car use? A study of the use of car parking within residential schemes in London Commissioned by the Berkeley Group. WSP
Improving the health of Londoners – Transport Action Plan - <a href="https://www.tfl.gov.uk/cdn/static/cms/documents/improving-the-health-of-londoners-transport-action-plan.pdf">https://www.tfl.gov.uk/cdn/static/cms/documents/improving-the-health-of-londoners-transport-action-plan.pdf</a>
Baseline air quality data <a href="http://www.londonair.org.uk/LondonAir/Default.aspx">http://www.londonair.org.uk/LondonAir/Default.aspx</a>
Baseline air quality data <a href="http://uk-air.defra.gov.uk/latest/currentlevels">http://uk-air.defra.gov.uk/latest/currentlevels</a>
Noise maps <a href="http://services.defra.gov.uk/wps/portal/noise/maps">http://services.defra.gov.uk/wps/portal/noise/maps</a>
Roads Task Force technical reports, 2013
Travel in London reports 1-7. Mayor of London and Transport for London, 2009 to 2014
LDD academic study on impact of maximums on number of spaces being delivered

- 5.2 The Mayor is preparing further evidence to inform his preferred approach. Evidence is likely to include:
1. Case studies of car parking levels and car use. Including site visits, resident and business questionnaires, surveys on surrounding roads, parking restrictions etc.). These studies will explore differences and impacts between:
    - a. Outer London versus Inner/Central
    - b. Low versus high PTAL areas
    - c. Different types of development in different urban contexts
  2. London Development Database
    - a. Review of parking in referable developments
    - b. Compare parking against Controlled Parking Zone (CPZ) implementation over the same time period
  3. TRICS (Travel database updates)
    - a. Surveys to isolate different factors in influencing mode share

- b. Assumptions of trip generation rates and their propensity to increase/decrease as parking levels change
- 4. Segmentation study – including adding car parking as a question for future surveys
  - a. Analyse different demographic information
  - b. Undertake attitudes to driving surveys
  - c. Analysis of car ownership and attachment to cars – impact on car usage
- 5. Desktop study
  - a. Review previous parking research, A desk review of the role of parking and impacts of increasing parking on other factors, such as health and environment
  - b. A comparison with approaches taken in other cities, e.g. Transport for Greater Manchester
- 6. LTDS
  - a. Longer term LTDS follow up surveys on type of parking available and trip rates etc.
- 5.3 This evidence will inform potential impacts on:
  - Car ownership / use / mode shares etc
  - Traffic and congestion
  - Health / environment
  - Social impacts / equalities
  - The space for housing / development and for densities (eg we could require integrated parking to avoid reducing space available for housing but densities would be likely to need to fall if sustainable mode shares are lower / car use higher)
- 5.4 In addition, the Outer London Commissions has been reconvened to investigate the views and potential approaches to car parking by various stakeholders in outer London.

#### Key Issues and trends

- 5.5 In line with guidance on outlining the scope of the IIA appraisal key issues and trends should be identified. A review of the existing documents and data report a sustained growth in demand for travel, reflecting population and employment growth as well as wider social and economic factors. This growth is characterised by a substantial and sustained shift away from the private car and towards public transport. The Travel in London Reports provide a comprehensive review of travel across London, including for some elements by sex, age, income and accessibility. Key facts and trends include:
  - in 2013, 33 per cent of journey stages in London were made by private transport, down from 46% in 1993
  - car driver trips are now 13.5% lower than in 2001, despite the 15% increase in London's resident population over the same period
  - car driver trips make up a larger proportion of trips within outer London than in other areas of London
  - car ownership is higher in outer London compared to inner London, and has not changed substantially since 2005/06
    - o approximately 30% of outer London households do not have access to a car, compared to 55% of inner London households

- 50% of outer London households have access to one car and 20 per cent have access to two or more cars (a decline of by 11 per cent since 2005/06)
  - In outer London, the number of households who have access to one car has increased by 7% and the number of households who do not have access to a car has decreased by 2%
  - access to one car in Outer London is slightly higher than the national level, however no access to a car and access to two or more cars is lower
  - in 2013 there were 137,000 car club members in London. This is approximately 2% of London's adult population or about 3.4% of driving license holders
  - some 80% of car club members don't own a car
  - traffic volume in 2013 was 10.7% lower than in 2001. This was driven by the decrease in car traffic, which makes up almost 80 per cent of all vehicular traffic on London's roads. However, there was a 7.6% increase in LGV traffic above 2001 levels, closely following patterns in London's economic growth.
  - it appears that central London traffic volumes are continuing to decline, while outer London volumes increased in 2012 and 2013 after a long-term decline.
- 5.6 A review of the planning permissions between 2004 and 2014 shows that the rate of provision of car parking space in residential schemes in outer London has remained relatively stable. Parking in outer London was provided at 0.8 spaces per unit in 2004 with a decline to 0.68 spaces per unit in 2010. This was followed by a significant increase to 0.85 spaces per unit in 2011 and a peak of 0.99 spaces per unit in 2013. The rate of provision remains below the London Plan maximum standard for high (max of 1 space per unit) and low (max 2 spaces per unit) PTAL<sup>13</sup> areas in suburban locations. Residential parking provision in the Central Activity Zone (CAZ) and Inner London generally remained at between 0.4 and 0.2 spaces per unit. See Annex 1 for the specific statistics on the provision of residential car parking spaces.
- 5.7 The impacts of the proposed Minor Alterations on residential parking standards in outer London are to be monitored. The London Plan includes 24 Key Performance Indicators (KPIs). For consistency, these proposed Minor Alterations will be monitored against these KPIS. Those relevant for the monitoring of these proposed alterations include:
- 2. Optimise the density of residential development
  - 4. Increase the supply of new housing
  - 6. Reducing health inequalities
  - 10. Growth in employment in outer London
  - 13 - 16. Achieve a reduced reliance on the private car and a more suitable modal split for journeys
- 5.8 In addition to this formal reporting through the London Annual Monitoring Report, the London Development Database collects data on the number of residential car parking spaces provided in developments. TfL also collect data on a wide range of transport movements and indicators. For example, see TfL's Travel in London Reports.

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<sup>13</sup> Public Transport Accessibility Levels

## 6 Review of Assessment Framework

- 6.1 The establishment of appropriate objectives is central to the assessment process and provides a way in which the performance of the proposed Minor Alteration on residential car parking standards in outer London can be identified and described. Using objectives ensures that each area required by the SEA Directive is addressed enabling the likely effects of its implementation to be identified.
- 6.2 An objective led approach is considered to be appropriate to appraising the proposed minor alteration (parking) as it enables assessment of the extent to which the elements of the Minor Alteration on residential car parking standards in outer London contribute towards each objective rather than prescribed targets. It is therefore more qualitative and allows for a greater degree of the identification and description of effects rather than attempting to ascribe a quantitative value, which is more limited and restrictive at this strategic level. This approach would also ensure consistency with the IIA for the London Plan 2011 and its alterations and reviews.
- 6.3 The key sustainability objectives used in the previous IIA Scoping Reports will be used in this assessment in order to maintain consistency between different stages of the London Plan review process. This is to ensure consistency with the overall London Plan as these alterations do not alter the overall objectives or framework of the Plan.

Key Sustainability Objectives
<b>1. Regeneration &amp; Land-Use.</b> To stimulate regeneration and urban renaissance that maximises benefits for the most deprived areas and communities.
<b>2. Biodiversity.</b> To protect, enhance and promote the natural biodiversity of London.
<b>3. Health and Well-being.</b> To maximise the health and wellbeing of the population and reduce inequalities in health.
<b>4. Equalities.</b> To advance the equality of opportunity for all communities and especially between people who share a protected characteristic, and those that do not have that characteristic in order to minimise discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London in a way that brings all Londoners together.
<b>5. Housing.</b> To ensure that all Londoners have access to good quality, well-located, housing that is affordable.
<b>6. Employment.</b> To offer everyone the opportunity for rewarding, well-located and satisfying employment.
<b>7. Stable Economy.</b> To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimise unsustainable resource use.

<b>8. Flood risk and Climate Change Adaptation.</b>	To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.
<b>9. Climate Change Mitigation and Energy.</b>	To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.
<b>10. Water Quality &amp; Water Resources.</b>	To protect and enhance London's water bodies and the Blue Ribbon Network.
<b>11. Waste.</b>	To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.
<b>12. Accessibility and Mobility.</b>	To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).
<b>13. Built and Historic Environment.</b>	To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces are appropriately designed.
<b>14. Liveability and Place.</b>	To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.
<b>15. Open Space.</b>	To protect and enhance natural open space in London.
<b>16. Air Quality.</b>	To improve London's air quality.

## 7 Programme

- 7.1 The proposed minor alteration (parking) and its full IIA report are likely to be published for consultation in May 2015.

## 8 Providing a Scoping Opinion

- 8.1 We would welcome your views on this IIA Scoping Report.
- 8.2 All comments will inform the scope of the full IIA. We would be particularly interested in hearing your views on the following:
- do you have any key baseline evidence which will help to inform the IIA?
  - do you agree that the IIA objectives cover the breadth of sustainability issues appropriate for the IIA of these minor alterations?
- 8.3 Please provide comments by 5pm on Friday 13th March 2015.
- 8.4 Comments should be sent to [celeste.giusti@london.gov.uk](mailto:celeste.giusti@london.gov.uk) and [peter.heath@london.gov.uk](mailto:peter.heath@london.gov.uk)  
(Please include Parking Standards IIA Scoping Response', in the subject line



### Annex 1 – Number of car parking spaces approved in residential development

Permissio n Financial Year	Locatio n	Proposed units	Net Residential Gain	Residential Parking Spaces	Average parking spaces	Average dwellings per hectare
FY2014	CAZ	3,061	2,857	613	0.2	328.43
	Inner	12,371	11,184	2,231	0.2	211.74
	Outer	12,008	10,602	9,020	<b>0.8</b>	63.00
	Sum	27,440	24,643	11,864	0.4	106.22
FY2013	CAZ	6,910	6,469	2,242	0.3	315.89
	Inner	29,038	25,388	10,226	0.35	219.74
	Outer	25,002	20,032	24,694	<b>0.99</b>	82.86
	Sum	60,950	51,889	37,162	0.61	133.73
FY2012	CAZ	8,827	7,373	1,788	0.20	445.38
	Inner	30,838	27,802	4,433	0.14	161.95
	Outer	14,884	11,457	11,603	<b>0.78</b>	77.70
	Sum	54,549	46,632	17,824	0.33	135.86
FY2011	CAZ	15,816	15,377	5,635	0.36	369.23
	Inner	45,839	42,278	19,753	0.43	257.41
	Outer	28,017	25,248	23,924	<b>0.85</b>	91.53
	Sum	89,672	82,903	49,312	0.55	170.15
FY2010	CAZ	3,168	2,876	652	0.21	372.75
	Inner	22,491	20,188	5,172	0.23	225.70
	Outer	32,426	29,686	21,837	<b>0.68</b>	103.20
	Sum	58,085	52,750	27,661	0.48	137.53
FY2009	CAZ	1,426	1,188	280	0.20	255.19
	Inner	36,662	29,058	8,961	0.24	219.06
	Outer	16,817	13,582	12,138	<b>0.72</b>	99.77
	Sum	54,905	43,828	21,379	0.39	160.78
FY2008	CAZ	3,018	2,839	717	0.24	350.48
	Inner	24,084	20,064	7,879	0.33	205.92
	Outer	19,037	15,339	13,412	<b>0.70</b>	94.80
	Sum	46,139	38,242	22,008	0.48	141.36
FY2007	CAZ	4,557	4,166	1,556	0.34	409.87
	Inner	38,278	35,506	17,391	0.45	261.19
	Outer	34,422	31,603	26,436	<b>0.77</b>	102.75
	Sum	77,257	71,275	45,383	0.59	156.81

<b>FY2006</b>	CAZ	7,019	6,646	2,016	0.29	354.60
	Inner	23,786	21,314	9,914	0.42	176.55
	Outer	23,103	19,459	18,770	<b>0.81</b>	92.96
	Sum	53,908	47,419	30,700	0.57	133.75
<b>FY2005</b>	CAZ	3,836	3,621	2,176	0.57	384.72
	Inner	21,861	18,856	8,418	0.38	213.70
	Outer	25,961	22,550	18,781	<b>0.72</b>	100.31
	Sum	51,658	45,027	29,375	0.57	139.21
<b>FY2004</b>	CAZ	3,291	3,164	1,102	0.33	330.55
	Inner	19,949	17,448	7,901	0.40	179.33
	Outer	22,689	20,034	18,055	<b>0.80</b>	94.44
	Sum	45,929	40,646	27,058	0.59	127.07

(Source: London Development Database February 2015)