

**Planning Committee – 16 June 2015**  
**Transcript of Item 8 – Minor Alterations to the London Plan and Housing SPG**  
**Consultations**  
**Session One: Parking Policy**

**Nicky Gavron AM (Chair):** Thank you very much. We are going to begin, as I said a minute ago, our discussions with our expert panel – and I am going to ask them to introduce themselves in a moment – to look at the way the Government would like us to change our parking policies and what the Mayor’s approach to that is.

You just need to know that after this meeting we will be using our deliberations to inform this Committee’s response to the Mayor’s consultation document on these two sets of alterations. That has to be done by 22 June and so we have one week, just so that you are aware that this is what this is going to help us with.

I would like each of our expert panel to introduce themselves and just give us one line on their roles. Remember, this is where we are doing parking standards.

**John Lett (Strategic Planning Manager, Greater London Authority):** John Lett, the lead on the London Plan.

**Peter Heath (Senior Planner, London Plan Team, Greater London Authority):** Peter Heath. I work for John in the London Plan Team with responsibility for transport issues.

**Peter Wright (Policy Manager, Transport for London):** Peter Wright, Policy Manager, Transport for London (TfL), responsible for the analysis that TfL has undertaken as part of the change.

**Michael Bach (London Forum of Civic and Amenity Societies):** Michael Bach, London Forum. We have taken a leading role in the London Plan and the Examinations in Public. The last time around, we dealt with parking standards and we strongly supported the Greater London Authority (GLA) in resisting. I should say that in another life I was responsible for devising maximum parking standards for the national Government based on London’s experience.

**Nicky Gavron AM (Chair):** Planning Policy Guidance 13 (PPG13)?

**Michael Bach (London Forum of Civic and Amenity Societies):** And PPG3.

**Nicky Gavron AM (Chair):** And PPG3? OK. Thank you.

**William McKee (Chair of the Outer London Commission):** Will McKee – the Chair of the Outer London Commission. Parking is one of the issues that we were asked to consider by the Mayor. We are an independent body. We make our own views on the issues we are asked to look at and the Mayor and the GLA make their minds up about what we say.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** I am James MacColl from the Campaign for Better Transport and I am the Head of Campaigns.

**Nicky Gavron AM (Chair):** Excellent. A very good group to help us with our deliberations. If I just kick off, Members, given that we have already very flexible policies within the London Plan, why has it been so difficult

to persuade the Government of the Mayor's approach to parking? Perhaps I should start off with John Lett and the GLA people first.

**John Lett (Strategic Planning Manager, GLA):** Thank you, Chair. The Mayor, as any Mayor, always keeps his plan under review and we have a constant interchange, not least through the Outer London Commission, with the various parts of London and the relevance of the policies, including parking policies. We had feedback that while, as you quite rightly say, there is flexibility in the Further Alterations' approach to parking, there could very well be more to address the distinct circumstances of those parts of outer London that have poor public transport accessibility and tend to be relatively low density. The Mayor, of his own volition, although it was subject to comment by the Government, decided to have a look at this issue again.

The Government was concerned. That is quite true. We had two sets of representations when we were doing the Further Alterations, Peter, I think. Is that correct?

**Peter Heath (Senior Planner, London Plan Team, GLA):** Yes.

**John Lett (Strategic Planning Manager, GLA):** What we have done is to commit in the light of those representations within the body of the Plan itself to look again at these particular issues in these particular areas and to take into account any guidance that the Government has issued subsequently, which it did on 25 March. This is the Mayor's response, informed by that guidance, you will see, has a very distinct outer London edge to it that is not universal in the way that the Government is suggesting it could be in its national approach. It is taking that national approach and tailoring it to the distinct circumstances of outer London. Chair, that is as far as I want to go at the moment but I am very happy to come back.

**Nicky Gavron AM (Chair):** Would you like to add anything, Peter Wright, perhaps?

**Peter Wright (Policy Manager, Transport for London):** Only that, as you say, the flexibility exists but, in looking at specific areas of outer London that have low public transport access, the policy just sets out the specific characteristics that should be considered in addition to those that were in the National Planning Policy Framework (NPPF), which did already exist and just asked to take into account local characteristics. All the policy has done is to take some of the transport connectivity measures and to use that as the basis for the final policy.

**Nicky Gavron AM (Chair):** James, do you want to come in?

**James MacColl (Head of Campaigns, Campaign for Better Transport):** Yes, I wanted to make a point that probably no one else would about the Mayor's ability to persuade the Government at the current time. We have had an election recently. We now have a new Communities Secretary. Eric Pickles [Rt Hon Eric Pickles MP, former Secretary of State for Communities and Local Government] was very much in favour of changing parking regulations and I would think that his political will was behind a lot of these changes. He is no longer in place. Instead, we now have Greg Clark [Rt Hon Greg Clark MP, Secretary of State for Communities and Local Government], who is a very different politician. The Government is also obliged to bring forward this year a national plan for reducing air pollution and I would think that that is an opportunity to engage with the Government in a different way this year.

**Nicky Gavron AM (Chair):** What is your response to that, actually, John? That sounds encouraging, does it not? There is a window of opportunity that was not there before.

**John Lett (Strategic Planning Manager, GLA):** We will certainly pay very close attention to any representations the Government may wish to make. This is a --

**Nicky Gavron AM (Chair):** That the Government manages to make?

**John Lett (Strategic Planning Manager, GLA):** The Government is being consulted on these Minor Alterations to the London Plan (MALP). The way the Government responds will of course influence the course that the Mayor takes.

**Nicky Gavron AM (Chair):** The Government is consulting, is it not?

**John Lett (Strategic Planning Manager, GLA):** No, we have consulted the Government on our MALP --

**Nicky Gavron AM (Chair):** I see. I get it.

**John Lett (Strategic Planning Manager, GLA):** -- and it will come back to us. I am not privy to Mr Clark's views on parking relative to those of Mr Pickles but, if there has been a huge sea-change in the Government's approach to parking, then I would expect that that would be reflected in any representations the Government makes to the Mayor.

**Nicky Gavron AM (Chair):** Yes. I do not know which of you is the most appropriate, but we do have transport impact assessments, which look at every development in relation to parking. We do have a very tailored approach already. It is not just looking at parking standards for urban, central and suburban. It is even looking at whether it is a terraced house, a block of flats, a detached house or a semi-detached house. Am I not right on this? It is all very tailored already and it is all very flexible, too.

**John Lett (Strategic Planning Manager, GLA):** What we are setting here is the general policy approach for the application of case-by-case consideration. Yes, you are, as I understand it, quite right. We do transport impact assessments and Peter Wright will be able to explain that. They are doing large assessments, as far as I am aware, and we are dealing very substantially with smaller ones here. Peter?

**Peter Wright (Policy Manager, Transport for London):** Yes, at the moment a transport assessment looks at the suburban, urban or central characteristics and the density of those developments. It does not specify whether it is a different type of house or terrace. It is based on the density of the development. The parking spaces are then defined as a result of the number of dwellings in that area.

In terms of large transport assessments for things like opportunity areas and large development applications, they would undertake their own local transport evaluation of the impact on the area and then that will also help define what section 106 contributions to public transport should happen off the back of that.

**Nicky Gavron AM (Chair):** We can come back to section 106. There is a question about that a bit later down the agenda. Does anyone else have any point to make just on this opening?

**Michael Bach (London Forum of Civic and Amenity Societies):** Yes, I would like to say something. The good thing - or the bad thing, depending how you look at it - is that it [policy responsibility] has been transferred from the Department for Transport to the Department for Communities and Local Government (DCLG) and the officers concerned are on a steep learning curve. The Government has never really understood parking standards, particularly for London.

What it also does not understand, although they would soon tell you if you obliged local authorities to conform in detail to the London Plan, is that boroughs can conform generally, which means that they can depart from the standards without needing to change the policy. In other words, one line you could take on this - apart from the political imperative to be seen to be responding to Mr Pickles - is that you do not actually need to do it [i.e. change the London Plan] to achieve what you want to achieve, which is that the boroughs that think

they need it can put it in their own plans and it will be tested at the Examination in Public. They have freedom to depart, as long as they can justify it. That is what the whole system from top to bottom, from the Government down to the local level, is about. You are only required to conform generally, not in detail, and so you do not need it.

London has been using maximum parking standards for the last nearly 50 years and has the most sophisticated set of policies in the country. I am not sure that the Government actually appreciates that. Therefore, our view is that you probably do not need to do this change other than for the imperative of the Secretary of State wanting to do something. We will come to the detail a bit later, but there is enough flexibility in the system.

**Nicky Gavron AM (Chair):** There are examples - and Will McKee could probably give us some - of developments that go above the maximum of two parking places per unit. Will, you must be aware of these.

**William McKee (Chair of the Outer London Commission):** I just wanted to say one thing about what the issue is. The Commission is independent and it includes amongst its members boroughs, TfL, developers, professional planners and businesspeople. What is interesting is that there is no dissent that I can see that people want the ability to be flexible to meet certain circumstances locally. If you were able to identify key typologies of settlements that that embraces, the key typologies are the low public transport accessibility level (PTAL) areas, 1 and 2 in particular and --

**Nicky Gavron AM (Chair):** Can you just explain PTAL in case there is somebody listening who does not know?

**William McKee (Chair of the Outer London Commission):** Sorry. Probably Peter [Wright] is better placed, but it is a measure of the accessibility of the public transport system to residential properties and other properties.

**Peter Wright (Policy Manager, Transport for London):** Yes. It is a definition in the London Plan. It is a detailed measure of connectivity to public transport and it takes into account the services that are provided and the frequency of them. It does not measure anything to do with demand. It just says, from a location, how connected it is to the public transport system, 0 being the lowest and 6b being the highest. Generally around stations and towards central London, it will end up with 6b, and 0 will be essentially parks and places that are suburban in the very extreme parts of outer London.

**William McKee (Chair of the Outer London Commission):** The essential point that I just want to make is that that is in 0 to 1 and, in some circumstances under defined criteria, PTAL area 2. The important point is that it was generally recognised that there is the need for flexibility. There is disagreement about how you express that need for flexibility, but there is not any disagreement about the need for that flexibility. Yes, we had views from the boroughs in particular and they were not always the same views, but then they were not always the same circumstances, either.

The issue for your Committee, if I could be so bold as to suggest, Nicky, is not the issue of whether there should be flexibility but the issue of how that need is expressed and whether the current policy does give you that flexibility - and I have to say that some boroughs said it did not in their view - or whether some other expression of that does meet what they consider to be the need.

Just to put it into context, the Commission very firmly did not support the abolition of maximum car parking standards and so we were not necessarily just following a wave created by the Secretary of State. That is the issue. The issue is not whether there should be flexibility. The issue is how that need is best expressed.

**Nicky Gavron AM (Chair):** I agree with that but, given that we at the moment have an approach that allows for flexibility, I was just trying to tease out that there are outer London boroughs where in fact you do see developments with parking standards over a maximum of two spaces per unit.

**Steve O'Connell AM (Deputy Chair):** It is very rare, Chair.

**Nicky Gavron AM (Chair):** I have not seen them.

**Steve O'Connell AM (Deputy Chair):** It is very rare. Can I come in now?

**Nicky Gavron AM (Chair):** Yes, of course.

**Steve O'Connell AM (Deputy Chair):** We can expand upon that point, if I may. I am glad you have brought that up. Let us get to the practicalities and actually why this debate is a live debate.

The GLA Conservatives published a report, *Parking Up*, in March 2015 and this is something that exercises very much London Assembly Members in outer London. We found evidence of boroughs that had an average from 0.37 - it was, shamefully, one of my boroughs, Sutton - per unit to 1.26 in Bromley. There is some evidence of more. For the record, our position is that we should scrap maximum parking standards and I would be interested in, Michael [Bach], why that is such a bad idea. Your point was, categorically, we would not support scrapping maximum standards in outer London. Remember what we are talking about.

My last point before both of you come in on that - and probably the planners as well - is that the fact of the matter is that the reason we are talking about this and the Government is talking about this is the potentially catastrophic effect on district centre regeneration of developments with very small parking, even if the PTAL ratings are high. I will give an example for the record. In another of my boroughs, Croydon: 200 units, 30 parking spaces, near a station. It is not yet approved, for the record, but it is a serious application that is being treated seriously and could lead to the ruination, in my view, of the district centre because of off-street parking.

They are inflammatory comments from me but, Will [McKee] and Michael, can you comment on what I have just stated?

**Michael Bach (London Forum of Civic and Amenity Societies):** First of all, why have maximum parking standards? London has had maximum parking standards for housing since 1969.

**Steve O'Connell AM (Deputy Chair):** It does not always make it a good thing.

**Michael Bach (London Forum of Civic and Amenity Societies):** No. Why is it sensible? First of all, land is expensive. One of the things I will say about the Integrated Impact Assessment (IIA) is that it does not deal with the big issues, which are how much land is going to be needed, what implication that has for housing delivery and what implication that has for housing prices. I do not know the answers to those questions, but they are all going in the wrong direction.

**Steve O'Connell AM (Deputy Chair):** There is the viability, which is what you are talking about. I understand that.

**Michael Bach (London Forum of Civic and Amenity Societies):** No, I am talking about affordability for affordable --

**Steve O'Connell AM (Deputy Chair):** Affordability and viability.

**Michael Bach (London Forum of Civic and Amenity Societies):** What was taking place outside London in particular was that people were being asked to provide a minimum – often it went up to five, I think, somewhere in Enfield – because the planning officers were just demanding more and more and the house-builders did not actually want to do it. They were at that stage in favour of having a maximum that was ‘realistic’, in their terms. They may not have liked the one that was introduced, which was nationally a 1.5:1 average over developments.

However, what you are talking about is not that the maximum is wrong. It is how it is interpreted in the local schemes by local planners. You say the average is coming out at 0.3, for example, when in fact the maximum is not there. It is somewhere at one or even higher. It is how it is being interpreted locally that is your problem, not the maximum parking standards themselves.

**Steve O’Connell AM (Deputy Chair):** A point that Will [McKee] made is that some boroughs are coming back – and John [Lett] will come in – and interpreting in different ways. Some boroughs for their own philosophical and political reasons are hanging their hats on directions from the Mayor and otherwise and are putting in very low parking spaces for green reasons or whatever reasons and that is legitimate. By removing the maximum standards, there would not be a reason for imposing very low standards. I know it is a slightly different debate --

**Michael Bach (London Forum of Civic and Amenity Societies):** The answer to that is very simple. If the standards were one or 1.5 or two and the local borough was demanding less than that, it is a local decision, not a mayoral decision. The mayoral ceiling is sufficiently high to deal with developments.

**Steve O’Connell AM (Deputy Chair):** I will come back again on that and I will bring Peter [Wright] in as well later because I have examples of 96 occasions when TfL requested a reduction in parking spaces out of 211 stage-one applications. You might say that it is up to the boroughs and the heavy hand of City Hall will not have an effect. TfL does have an effect and I would be interested in Peter’s comments around that. If we took away those maximum standards, it would not be the case. I think John wanted to leap in with a positive comment.

**John Lett (Strategic Planning Manager, GLA):** Chair, if I can just bring Mr Bach’s attention firstly to the IIA on page 22, section 5, where we talk about the implications for land and viability and also to the Outer London Commission report, section 4.4, which is all about land and parking.

**Michael Bach (London Forum of Civic and Amenity Societies):** It does not come out in the final assessment and the table. It seems to say for housing that it is a positive, whereas --

**John Lett (Strategic Planning Manager, GLA):** It actually says, Mr Bach, “minor positive” and “minor negative”, ie this is right on the cusp. We are not dealing, as the Outer London Commission report shows, with really substantial developments. We are dealing, nevertheless, with a significant part of London. The Mayor is not trying to do a one-size-fits-all maximum blanket across London. He recognises that there are different needs in different areas and this was raised, as Mr McKee has said, by a number of boroughs when we went around. The Assembly has also heard similar things. What we are trying to introduce here is greater flexibility to be able to address that and strong wording in policy to make sure that account is taken of it.

**Michael Bach (London Forum of Civic and Amenity Societies):** The NPPF sets out the criteria for local authorities for drawing up parking standards, which you are following and which the boroughs can follow.

**Steve O’Connell AM (Deputy Chair):** You mentioned wording and, as planners and attachments to planners, we all obsess around the wording. The Mayor’s wording in his policy is that boroughs should

“promote a more generous standard”, rather than, for example, ‘allow’ or ‘permit’. ‘Promote’, I am told, is good and is strong. From where I am sitting, it is stronger than ‘permit’. Would colleagues like to comment on the Mayor’s wording? James, do you want to come in?

**James MacColl (Head of Campaigns, Campaign for Better Transport):** It is unfortunate and unnecessary to use the term ‘promote’. I just want to quickly come back to your point about the flexibility. Someone said it was rare and unusual for schemes to be approved at high parking levels, but actually I have a briefing note that says that 22% of schemes were approved at higher parking levels in outer London than the current London Plan standards compared to 14%. It does not sound particularly rare to me at 22%. That is a large amount.

There does not seem to me to be any case to introduce maximum parking standards or certainly promote them at a local level. London, as Michael [Bach] has pointed out, has had maximum parking standards for 40 years and has not suffered economically as a result of that. In fact, traffic levels in London have been falling. Over the period between 2003 and 2013, there was a 10% fall in traffic in London. Therefore, if anything, the need is reduced to introduce maximum parking standards. There will be less traffic and less driving in London.

**Steve O’Connell AM (Deputy Chair):** Just to be helpful, I will challenge you back. One fallacy is that if you introduce one-for-one, for example, all those cars will be used every day for commuting. The research that we followed through was that the majority of those cars sit in that parking space all week while people commute. It is a fallacy that you will bring an ecological catastrophe to London by increasing the parking standards.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** Yes. The data that that seems to rely on is the Berkeley Homes report done in 2011 that looked at the amount of car ownership, the amount of car use, the amount of car space and the relationships between those factors. It seemed to conclude that there was very little correlation between car spaces, car ownership and car use.

Actually, we looked at the table that they did and there was quite a strong correlation between those factors, in fact, a correlation with a coefficient of 0.8 between the provision of parking spaces and the level of car ownership, which is significant even for the small sample size that was used. We looked again at the 2011 Census data and compared the average number of cars per household with the percentage driving to work or commuting and actually, again, there was a very strong correlation there. It is just not true. The evidence that is relied on, based on a survey and conclusions presented by Berkeley Homes, is wrong.

**Steve O’Connell AM (Deputy Chair):** OK. For William and Michael [Bach], you may have agreeing or differing views. The wording that I have just quoted from the Mayor’s insertion into the plan: what is your take, exactly? Do you agree or differ?

**William McKee (Chair of the Outer London Commission):** It was not the Commission’s words.

**Steve O’Connell AM (Deputy Chair):** No, I did not say it was. What is the Commission’s opinion?

**William McKee (Chair of the Outer London Commission):** The fact that it was not the Commission’s words says that we were not saying that is what it should be. This is all about typologies and planning policy finds it quite difficult to relate generalised policies to specific circumstances.

The issue that was put in front of us by some parts of London - and it was put very strongly by different boroughs and not always of the same political complexion and so it was not a political point - was that the ability of their citizens to enjoy a life with the right opportunity to find jobs and with the right opportunity to carry out other aspects of their lives was compromised because of the inadequate, in their view, opportunity that public transport would provide for them. Orbital routes, for example. I will give you one. I cannot

remember the borough. It may have been Barnet. A lot of the transport availability that was there went south when a lot of their borough residents were looking for opportunities that went north.

What we as the Commission were trying to do was to say, "This is a real situation. Can we devise a way in which planning policy can respond to that?" We do not say, "Throw the baby out with the bathwater and get rid of maximum parking standards", because there are parts of London where that is an entirely appropriate planning policy to have in place. We simply addressed that --

**Andrew Boff AM:** Which parts of London? You are saying it is entirely appropriate --

**William McKee (Chair of the Outer London Commission):** Central London, for example.

**Andrew Boff AM:** Yes, but we are talking about outer London here.

**Steve O'Connell AM (Deputy Chair):** Yes, our specific recommendation is outer London.

**Andrew Boff AM:** Yes. Which are the parts of outer London where these are --

**William McKee (Chair of the Outer London Commission):** Around some of the major town centres, for example, where there is a very high density of public transport availability. If you lived in Park Lane in Croydon, for example, you really would not have any excuse to demand particularly high parking standards. You can get into the Croydon town centre quite easily without the need to use a car. That is not true of large parts of outer London.

What we were saying was asking we can see a balance of policy aspiration. We looked at all the factors and we said that we do not believe that now - or, for that matter, in the future - our public transport is likely to be able to fulfil the aspirations that the boroughs were telling us about, even with improvements. Those improvements were likely to be in terms of the frequency of a very thin network rather than the creation of a very dense network. That was one issue.

We also looked at whether if we recommended that boroughs could - where they considered it appropriate and where certain criteria were met - increase the number of parking spaces, which is likely, being realistic, to be only in the range of half a space up to possibly one space; what would that do to other mayoral and London needs, housing, for example? We came to the conclusion that that was likely to be annually somewhere between 600 and 1,000 houses, which is, in the totality of the housing issue, weighed against the accessibility issues. The balance there, we felt, was in improving the accessibility because the impact on the housing issue was marginal. The impact on the accessibility issue was considerable.

We tried to reach that balance. We were specific in saying, first of all, that this was an enabling opportunity for boroughs. They were not being told they had to do it. They were being told that it was only where certain accessibility criteria were met that it could be enabled and so it had to be in the areas of low accessibility. We tried to reach a balance.

**Nicky Gavron AM (Chair):** Did you come to a view on the wording?

**William McKee (Chair of the Outer London Commission):** Sorry, Chair. I have an ear infection.

**Steve O'Connell AM (Deputy Chair):** The question was about the wording. The wording that you just said is not the wording of the Commission?



**William McKee (Chair of the Outer London Commission):** No, that is not our wording. If you have an issue with the wording that is there, you probably ought to be asking someone else.

**Nicky Gavron AM (Chair):** What is your wording?

**William McKee (Chair of the Outer London Commission):** Our wording is "should consider".

**Nicky Gavron AM (Chair):** "Should consider"? OK.

**Michael Bach (London Forum of Civic and Amenity Societies):** Shall I try to answer?

**Steve O'Connell AM (Deputy Chair):** Yes, you go on. Please do.

**Michael Bach (London Forum of Civic and Amenity Societies):** I went to the presentation and I was struck by the use of the word 'promote' and I took a punt and said, "This word is rarely used in the London Plan". Actually, this is just the first four chapters and it is used frequently in the London Plan.

However, the feature of it is that it is a term of advocacy for the attainment of high-level objectives. Within the scheme of things, fiddling with the parking standards at the margin is not the high-level objective. It is something where you are advocating flexibility. Therefore, we are strongly opposed to it appearing to be an advocacy of departing from the general standards of the London Plan. It is not a term that justifies exceptions. You should say something like, "We will exceptionally permit this, but you have to justify it", and that is fine.

Will [William McKee], I am treading on your toes. I had the impression that the Outer London Commission was recommending flexibility and not advocacy. In other words, 'promotion' is a very strong term. To 'allow' or 'enable' or 'permit' departures from the plan needs to put in much softer terms and we are suggesting that it should be worded in terms of 'exceptionally permit' rather than 'promote', which gives a totally different message.

**Steve O'Connell AM (Deputy Chair):** Before I hand over to Navin [Navin Shah AM] and I know the planners will want to come back on that, I did throw the gauntlet down to Peter earlier and it is only fair that he responds. I was talking about TfL's invasive tactics around rejecting a significant number of applications and demanding a lower parking ratio. Do you want to briefly respond, Peter, just out of fairness?

**Peter Wright (Policy Manager, Transport for London):** I will, although I am not someone who assesses the plan applications that come in.

**Steve O'Connell AM (Deputy Chair):** Would that be better for John, possibly, or anyone at your end? OK. I just wanted to pick up that point because I did throw one singular challenge down. We can cover that and then Navin will come in.

**John Lett (Strategic Planning Manager, GLA):** The term 'promote' was used very consciously. We wanted to send a very positive and very clear message. It is exemplified, if you like, by the final table in your briefing note. It is essentially that when local plans come in to be assessed for general conformity with the London Plan, they demonstrate that they have taken this relatively small-scale, as Mr Bach says, issue into account positively and that we have not - as we have had in the past in some cases, not all cases - situations where there has been a one-size-fits-all approach to the imposition of maximum parking standards. There is - and Mr Bach has picked up on it in an earlier meeting - an apparent contradiction between 'promote', which is strong in policy, and then in supporting text we use 'consider'. A strong policy political message, if you like, is being sent but the implementation of that as spelled out in the supporting text is that you have to 'consider'.

I can run you through the various ones if you look in paragraph 6.42(i): taking into account car dependency, low PTAL, minima, on-street parking, suburban character, family housing, future public transport provision and the use of controlled parking zones (CPZs), and thinking just possibly that this might not just apply in PTALs 0 to 1 but also in some parts of PTAL 2. There are a series of considerations there and you must demonstrate that you have taken those into account. You might come to a view that maximum parking standards still pertain there, but the Mayor will want to see that an outer London borough has gone through that exercise.

**Steve O'Connell AM (Deputy Chair):** Thank you, Chair.

**Nicky Gavron AM (Chair):** Can I just ask? Is that not what an outer London borough has to do anyway in order to justify going above the maximum of two at the moment? As we have heard, boroughs do go for particular developments above the maximum of two. Is that not exactly what they have to do?

**John Lett (Strategic Planning Manager, GLA):** As your table clearly shows, Chair, they have been going below it.

**Nicky Gavron AM (Chair):** Yes. Some go below it and some go above it.

**Steve O'Connell AM (Deputy Chair):** A few go above it, Chair.

**John Lett (Strategic Planning Manager, GLA):** I think you will find that, actually, all of them go below.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** That is necessary and is right in those cases because you will be looking at those figures and saying --

**Michael Bach (London Forum of Civic and Amenity Societies):** That is a one-size-fits-all view of the world, yes.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** We do not need to say, "Some of them are going below and therefore we have to make them go higher". If they are going below, it is because that is the right thing for them to be doing.

**Andrew Boff AM:** Really?

**Michael Bach (London Forum of Civic and Amenity Societies):** No, it is what they have chosen to do. They have interpreted the Mayor's standards, which are enabling insofar as you can have anything between zero and the ceiling. If they choose to go below that, it is their choice.

**Andrew Boff AM:** Those standards are interpreted in planning the developments. I have moved into Barking Riverside and have been there for two years now. It is an absolutely lovely place with eco-homes, a beautiful environment and low-cost housing, but for a row of 16 four-bedroom houses they put in 12 parking spaces. The residents of Barking Riverside are a lovely bunch. We get on together like crazy. We have lunch in each other's houses and we have parties and all the rest of it. We get on like crazy. The only thing that has come close to causing fistfights is parking. The residents from Riverside have gone back to the council and said, "We want to adjust. We need more parking". These are four-bedroom houses. My next-door neighbour is a limousine driver. He needs two cars. He needs one car for his daughters and himself and his family. He needs two cars. It is not unreasonable. He is not an eco-Nazi. He is not an eco-criminal.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** He has chosen to live there.

**Andrew Boff AM:** He is somebody who needs that and yet there are these restrictions. What do you say to those people who are in that situation and are struggling? We have quite a few years before we get a train link in. What do you say to those people? What do I say to those people? They hold me responsible for their parking.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** The London Plan is not at fault, in that case. That development was built on its own proposal for improved public transport links and all sorts. It is not a result of the maximum parking standards in the London Plan necessarily that there are very few parking standards as part of that.

**Michael Bach (London Forum of Civic and Amenity Societies):** Within the London Plan standards, you would have had more parking and it would still have been within the standard.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** There could have been more parking, but there was not --

**Nicky Gavron AM (Chair):** Sorry. What did you just say, Michael?

**Michael Bach (London Forum of Civic and Amenity Societies):** When you say there are only 12 spaces for 16 --

**Andrew Boff AM:** Yes, 16 four-bedroom houses. It is ridiculous.

**Michael Bach (London Forum of Civic and Amenity Societies):** Yes, but there could have been more spaces given and still be within the standard.

**Nicky Gavron AM (Chair):** Yes, it is down to the borough.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** That is no reason to change the parking standards in the London Plan.

**Andrew Boff AM:** If, as you said earlier, 22% did not abide by the standard anyway, why bother with the standard?

**James MacColl (Head of Campaigns, Campaign for Better Transport):** Our case is that the standard does not need to be changed. If that is already happening and what you are asking for is flexibility, the flexibility already exists. In fact, by promoting a greater number of parking spaces in new developments, you are increasing the amount of traffic that is going to be on the roads and so it is a problem.

**Andrew Boff AM:** The residents of Barking Riverside will look forward to more parking being promoted.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** Barking Riverside is a really good example of a great development. Actually, we produced a report yesterday called *Getting There* in which we put Barking Riverside as a really good example of a development that is based around public and sustainable transport.

**Andrew Boff AM:** Come to the residents' meeting on 30 June and see what the subject is that they are talking about.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** That transport will improve and a lot of people in that development will be happy with it. Our research demonstrates that development around

public transport and sustainable transport is better for the economy generally, but that is a wider point. I would contest that there is a problem with Barking Riverside.

**Nicky Gavron AM (Chair):** Will McKee, you want to come in and then Navin [Shah AM].

**William McKee (Chair of the Outer London Commission):** Yes. I just wanted to make one thing absolutely clear because we are talking about words here.

When we spoke to the representatives of the outer boroughs - it was not just the elected authorities, it was also businesses as well - they said that in their view they needed more flexibility and the words did not give them a clear route to the greater flexibility that they wanted to give. In saying that, it is not me arguing for the word 'promote'. I am simply saying that it was the very clear view of the boroughs that, as drafted at present, despite what Michael [Bach] says, they did not feel that those words gave them enough flexibility.

What the Commission tried to do in selecting the words 'should consider' was to extend the meaning of those words to give that increased flexibility without ditching maximum parking standards and without saying, "You must do this in every part of London", but to give that degree of flexibility.

The point I am trying to clarify, Nicky, is that the boroughs did not feel the present words did actually do the job for them.

**Nicky Gavron AM (Chair):** That is very helpful to know. On the other hand, they did not go for 'promote'?

**Michael Bach (London Forum of Civic and Amenity Societies):** No.

**William McKee (Chair of the Outer London Commission):** No, it is a fair comment and they did not say that, but they did not think the words were adequate enough to give them what they wanted.

**Michael Bach (London Forum of Civic and Amenity Societies):** What John Lett said was that all the things to consider are in the Commission justification. What they should consider is also in the NPPF. In other words, they know what they have to do. The flexibility is there. All you need to do is to say that exceptionally you will allow them to go above the standards and they have to provide the justification and they put their standards in their plan.

**Steve O'Connell AM (Deputy Chair):** Navin [Navin Shah AM] is going to come in, but you have heard from Andrew [Andrew Boff AM] and me examples and from the Commission examples of the fact that it has not worked up until now and there have been negative effects on district centres and on people's quality of life. I certainly would support the strongest wording possible that we have from this Mayor, which is taking a political lead.

**Nicky Gavron AM (Chair):** Stronger wording, yes. Do you see any downsides to 'promote'? I very much remember being involved with the London Planning Advisory Committee (LPAC) and those boroughs on the edge of London had quite a lot of problems. They wanted to keep to maximum parking standards but on the other side of the road, for instance, there would be a free-for-all. What does that mean in terms of developers going to particular boroughs and not to others? Would it lead to some kind of developers' free-for-all?

**Michael Bach (London Forum of Civic and Amenity Societies):** There are two separate things here. One is the non-residential parking standards and the question is whether businesses would prefer to go outside London where there are more generous standards. However, what we are talking about here is residential parking standards, which I do not think will have any effect like that. They either want to develop in London

or they want to develop outside London. The number of parking places probably is not a deal-breaker as to whether they do a project or not.

**Nicky Gavron AM (Chair):** You do not think a developer would choose to build a fairly dense development with lots of car-parking in one borough with a low PTAL rather than in another?

**Michael Bach (London Forum of Civic and Amenity Societies):** Some might choose to do that.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** You would need to ask the developers. I would assume that there would be more interest in developments with a larger number of parking spaces and in fact the point of this change is to make that happen. I would be surprised if they did not. The research shows that the more parking spaces, the more people drive.

**Peter Heath (Senior Planner, London Plan Team, GLA):** Also, the higher the cost of the house.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** That is their interest, obviously.

**Nicky Gavron AM (Chair):** It would mean they would be going for higher value?

**Peter Heath (Senior Planner, London Plan Team, GLA):** They would have to charge for the land and development proposals.

**Nicky Gavron AM (Chair):** They are likely to be more expensive developments? Is that right?

**Peter Heath (Senior Planner, London Plan Team, GLA):** Yes.

**Peter Wright (Policy Manager, Transport for London):** From the interviews that we undertook with boroughs and with developers as part of the research for the Outer London Commission, we found that developers - and even people living in developments as part of our additional research - said that the level of parking was one of many factors that they would take into account and that when it came to development, it was a marketability rather than a viability issue and they could use it as marketing to residents who want to live in those kinds of developments, but it was not a factor that would really determine a price differential when they were developing.

**Nicky Gavron AM (Chair):** Really? If you put more parking spaces in, you get less development and therefore the value of the development that is being marketed has to be higher and the price has to be higher?

**Peter Wright (Policy Manager, Transport for London):** It becomes a choice of what they provide as part of the development. From what they were saying, you could have a larger garden or more parking and those things could be taken into account within a development.

**Nicky Gavron AM (Chair):** Does anyone else want to come in on the value?

**James MacColl (Head of Campaigns, Campaign for Better Transport):** I understood that the representation from Berkeley Homes was that they wanted the option to provide more parking spaces with housing because it might, in some instances, be housing that then could be sold at a higher value. You would need to ask them what they are doing there.

**Nicky Gavron AM (Chair):** On the whole, you have to have a greater land take and that means less housing, does it not? It could even mean less affordable housing.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** Yes, and more traffic and congestion on the roads, do not forget.

**Nicky Gavron AM (Chair):** All right. John?

**John Lett (Strategic Planning Manager, GLA):** You need to bear in mind, Chair, that the Berkeley Homes research had one sample of PTAL 0 to 1?

**Peter Wright (Policy Manager, Transport for London)(?):** It was very much an inner London focus.

**John Lett (Strategic Planning Manager, GLA):** Yes, it was an inner London focus. It is not actually relevant to this.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** Yes. We did look at the figures in that piece of research. Even with the very low sample numbers, we did see a correlation that was significant between car-parking spaces and car use, contrary to their conclusions.

**John Lett (Strategic Planning Manager, GLA):** It is irrelevant.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** It is not because that research and that survey seem to be the basis of a large number of these policy changes through the national Government and also here in London. Therefore, it does not seem to me to be irrelevant and it is necessary for us to criticise and shine a light on their incorrect conclusions from their own survey data.

**William McKee (Chair of the Outer London Commission):** Can I just add a little bit of clarity to that? This is about what was said during our rounds and that is that neither is it true that a household with two car spaces has twice the exact use of that car in exactly the same pattern of usage as a one-car household. The point that was made several times was that, for example, one car may well go out on the road in the peak hour and add to peak-hour congestion, but another car may actually come out of that garage space at the weekend and another one may come out in the middle of the day. The point that was being made to us was that you cannot assume that a house with two parking spaces has simply twice the impact on London as a house with one parking space. It is different.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** No, but there is a correlation. The more parking spaces you have, the more driving you have and that is a fact. We can show that through looking at the census data. It is not exactly one-for-one but there is a relationship.

**William McKee (Chair of the Outer London Commission):** That is a fair point, but the point that was made in outer London was that, first of all, the need to make those extra journeys in a low-PTAL environment has a bigger impact on the quality of life and the choices people can exercise from those locations than in central London where they have other opportunities to exercise those choices.

**John Lett (Strategic Planning Manager, GLA):** Chair, just a point of fact. I am not aware that the census shows trip generation, as implied by the gentleman at the end.

**Nicky Gavron AM (Chair):** Do you want to comment on that, James?

**James MacColl (Head of Campaigns, Campaign for Better Transport):** I can show you. We have compared the average number of cars per household with the percentage driving to work and there is quite a clear correlation coefficient of 0.71.

**Nicky Gavron AM (Chair):** Did you hear that, John?

**James MacColl (Head of Campaigns, Campaign for Better Transport):** I do not know if you can see the picture, but I have it.

**Nicky Gavron AM (Chair):** You will have to show the evidence to John and to us. Thank you, James. Navin?

**Navin Shah AM:** Chair, it is interesting hearing the panel. I have always believed that the flexible approach in the London Plan for outer London borough parking has been very effective and has worked extremely well. This table that we have in front of us does give great evidence of how the distinctive requirements of boroughs, as John [John Lett] mentioned, have been met through this approach. Whilst you have an average outer London parking space per dwelling unit of 0.73, you find that some of the boroughs like Bromley have the highest parking space rate at 1.26 and the lowest are Kingston and Sutton at 0.37.

What is interesting also is from the boroughs that I represent and know extremely well in terms of their makeup and aspirations. Brent, which is nearer central London, is better served with public transport. There the space is like 0.54 spaces per unit. Harrow has 0.76, where public transport accessibility is not that great.

Given this evidence, it is wrong for the Mayor now to promote actively - which is how I see it and is generally the tone of what I have heard from the panel as well - greater parking standards. It is actually wrong and totally unnecessary. That is where I am with the Commission. The wording should be, actually, "should consider". That is more appropriate because you are giving out the wrong message. You are basically telling developers and boroughs to increase car parking standards, which is unnecessary. The current policies as they are have worked extremely well.

**Steve O'Connell AM (Deputy Chair):** They are catastrophic.

**Navin Shah AM:** You could tip the balance whereby you are actually destroying what has been achieved in terms of sustainable transport aspects, which are so critical, quite frankly.

I sat on the Planning Committee for 10 or 15 years in Harrow - we had huge discussions on the old Unitary Development Plans (UDPs) as well as the Local Development Framework (LDF) as to what the borough needs were. Yes, the major outcry you always get with housing development is parking, particularly where you have issues with public transport, but that is where the change in flexible approach in the London Plan for outer London boroughs has actually helped boroughs like Harrow and Bromley and wherever else.

Why should we then have a necessity for the Mayor and the London Plan to actively "promote"? It is wrong and it is actually going to destroy the other major achievements that we have had in the sustainable transport agenda. That is certainly my view.

**Nicky Gavron AM (Chair):** Does any member of the panel want to come in on this?

**Michael Bach (London Forum of Civic and Amenity Societies):** I would like to say that at the moment people do have a ceiling on what they can do, but the thing that I do not like in policy is even suggesting that minimum parking standards be promoted.

**Nicky Gavron AM (Chair):** That is in the supporting text, is it not?

**Michael Bach (London Forum of Civic and Amenity Societies):** That is in the text, yes.

**Nicky Gavron AM (Chair):** It is “should consider minima” and that is alongside “should promote generous”.

**John Lett (Strategic Planning Manager, GLA):** No ‘should’.

**Michael Bach (London Forum of Civic and Amenity Societies):** There is no ‘should’, just ‘consider’.

**Nicky Gavron AM (Chair):** Just ‘promote’?

**John Lett (Strategic Planning Manager, GLA):** The term ‘promote’ is defined in the supporting text in terms of considerations.

**Michael Bach (London Forum of Civic and Amenity Societies):** Promoting considerations is a very strange --

**Nicky Gavron AM (Chair):** Just let us get this right because wording is everything in this. What is the policy? The policy is not “should promote more generous standards”. What is in front of ‘promote’?

**John Lett (Strategic Planning Manager, GLA):** It is “should promote”, yes. That is in the policy.

**Nicky Gavron AM (Chair):** That policy is paramount. The supporting text amplifies it.

**John Lett (Strategic Planning Manager, GLA):** Then 6.42(i) to 6.42(k) defines that:

*“Outer London boroughs should take account of residents’ dependency on the car in areas with low public transport accessibility, generally ...”*

**Nicky Gavron AM (Chair):** Yes. You have read it before.

**John Lett (Strategic Planning Manager, GLA):** Yes.

**Nicky Gavron AM (Chair):** And “should consider minima”.

**John Lett (Strategic Planning Manager, GLA):** Yes, “should consider”.

**Nicky Gavron AM (Chair):** Yes, OK, but you have “should promote” and then “consider minima standards”.

**Navin Shah AM:** Chair, it is actually worse than I thought. From the information I have here in the briefing, it actually says that the Mayor has decided to phrase the policy proposal that boroughs should promote “more generous” parking standards. It is not just “generous” but “more generous” parking standards.

**Steve O’Connell AM (Deputy Chair):** John was in mid-flow and continuing when he was interrupted.

**John Lett (Strategic Planning Manager, GLA):** Nicky, it says “which could include minima”. There is some misrepresentation going on here.

**Navin Shah AM:** Chair, I do not think it is representation. Justification or explanation under the policy does not quite fit in with what the actual policy states. If you are talking about appropriate standards and that they should consider what the relevant standards are, it is not reflected in the policy itself. If you want to use ‘promote’, why can it not be “promote appropriate standards” rather than “more generous parking standards”? It is actually giving out the wrong message. You are saying that, “Yes, please have more generous parking standards”, which I do not believe you are actually saying in your explanation under the policy.



**Steve O'Connell AM (Deputy Chair):** What we are dancing around is that the Mayor and others, including us, want to promote more generous standards. Colleagues may not like that and that is a legitimate position to take, but also that is the overarching steer and underneath it is a subset of considerations that are complementary, not contrary. That is my understanding, John [John Lett], unless I have that wrong.

**Nicky Gavron AM (Chair):** Could I just make the point? We did hear a little bit earlier that if you do that, in terms of someone buying that land knowing that it is OK to have more generous parking standards, it will up the value of the house price. I do not know the circumstances of your row of terraced houses.

**Andrew Boff AM:** They are all very different. In that case, there is the commercial imperative.

**Nicky Gavron AM (Chair):** I know, but I imagine they are not the people who are pretty affluent. One of the reasons that people are able to be there - and they are in a very good position because there is going to be very good public transport soon - is because they can afford those homes. We are very concerned about the lack of affordable housing. I am not just talking about social housing and social rent or affordable rent or part rent-part buy. I am just talking about low-cost home ownership. There is an issue.

**Andrew Boff AM:** No, there are two things to look at here. There is a ratio of parking places per building, which is what has been applied in that case, and there is also physically what you can do. Physically, you could put in more parking spaces in Barking Riverside, for example - I am a bit parochial, sorry - without hardly any effect upon any other usage of land. You would have slightly less road space and slightly less green space, perhaps, but it would solve an awful lot of problems. I mean slightly; we are not talking about the massive removal of huge areas of parkland. We are talking about small compromises. However, what stops people from doing that is the parking standard and there is this general drive now, even in outer London, to discourage people from driving. Actually, aspirational people buy cars.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** In that case, the amount of parking per property is already much below the maximum. The maximum is not the problem in that case. Removing the maximum would have no effect.

**Michael Bach (London Forum of Civic and Amenity Societies):** It is the standard that has been applied rather than the standard constraining it.

**Andrew Boff AM:** Why have a standard at all? I do not see the point. In outer London, if you are going to allow exceptions and allow local decisions to be made, why bother with a standard? In that, we disagree with the Mayor.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** For all sorts of reasons: for air pollution, for climate change and for encouraging modal shift, which is something that has happened very successfully here in London and is an example for the rest of the country. Getting people out of their cars onto buses and onto trains is much better.

**Andrew Boff AM:** People need to make up their own minds about what mode they use. Do not tell them what to do.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** It saves lives. People die because of air pollution. It saves lives.

**Steve O'Connell AM (Deputy Chair):** You can have a modal shift if there is the transport infrastructure, but there are great swathes of outer London that do not have the transport infrastructure to be subject to your --

**James MacColl (Head of Campaigns, Campaign for Better Transport):** What you should be doing is investing in that transport infrastructure and not just public transport but also sustainable transport including cycling and walking. There are people who do not need to use their cars to get around.

**William McKee (Chair of the Outer London Commission):** Can I come in on that? That is a fair point to make and the Commission gave that very clear consideration. What the Commission said was, "What is the realistic prospect of that?" The answer was, "Not much", because of the low densities of outer London. Yes, some of the existing arteries may well be made more frequent. Yes, the chance of significant rail investment in London is practically negligible. The first thing that was ruled out when the Commission first met was the chance of an orbital route around outer London. Therefore, these are valid points to make.

However, they have to be seated in a realistic planning assessment of weighted pluses and minuses. Yes, of course people do not want to be killed by pollution but, yes, they do also want to be able to get to work and have some employment. In outer London those weighted balances are not the same weighted balances as in inner London for two reasons. One is that inner London has far more transport and the other is that inner London has far more pollution.

There is the Commission's very careful choice of the words 'should consider'. What that means is: weigh the evidence and take a balanced decision having considered all the relevant arguments, your ones as well as the other ones, and then reach a decision.

**Michael Bach (London Forum of Civic and Amenity Societies):** We agree with all the considerations. That is not the problem. All of those things should be taken into consideration. The boroughs, if they do have circumstances where they need to have different parking standards, can justify it.

The one thing I do not understand - and I am sure you will tell me there are lots of parking problems on the roads in Barking Riverside - is that a lot of people choose to park on the road and that may be the problem. Even if they have a garage that they do not use for a car or even if they have a front drive or forecourt, they often choose to do it. If people choose to do it and if it is a problem, CPZs may be one of the answers.

**Andrew Boff AM:** Absolutely, but enforcement becomes more just when there is an adequate provision of parking spaces. It becomes quite unjust when you know that as a result of putting in such controls, you are going to cause incredible difficulty and economic hardship as well to an awful lot of residents because they will no longer be able to use their cars. That works if at least the authorities are trying to accommodate. When the authorities are saying, "Actually, no, we are going to insist that everybody goes to work in a horse-and-trap", while they continue to do that, you are going to create resentment.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** Could I pick up on one phrase that was used there? If you are telling people they can no longer use their cars, it is not the case that parking standards are getting tougher. Traffic is falling in London and so it is not the case that more people want to drive and therefore the existing standards need to be raised or removed. Fewer people want to drive and so those existing standards are actually becoming easier. If anything, if it were to stay the same, those maximum standards would be reduced but they are not. They are just being --

**Andrew Boff AM:** It depends whether or not you see things in the aggregate. By what individual people are saying, these parking regimes are crazy because of the restrictions they put on people. In aggregate, you are absolutely right. We did not actually need the congestion charge. We want to abolish that as well. We did not actually need it because car usage was declining anyway into inner London. There was not any great contribution from the congestion charge.

**Nicky Gavron AM (Chair):** Car usage might have been declining because there were about 14 different measures, including the London Plan, which led to a staggering reduction compared with other cities in people moving out of the car into other types.

**Andrew Boff AM:** It was a daft thing to do. I do not know why people are driving less. I cannot understand it.

**Nicky Gavron AM (Chair):** Navin, did you want to come in?

**Navin Shah AM:** OK. Probably James and Michael [Michael Bach] might want to respond to this. How will these parking proposals sit with the Mayor's strategic policy approach in Policy 6.1, which is to "encourage patterns of development that reduce the need to travel", especially by car?

**James MacColl (Head of Campaigns, Campaign for Better Transport):** It seems to me that there is a conflict between that strategy and changing the plan in this way. Not only is it unnecessary but it is very much promoting more car use and that is certainly the effect that it will have. Therefore, it is in conflict with that strategic policy.

**Michael Bach (London Forum of Civic and Amenity Societies):** It is even madder in a way because, if it is a move to lower densities, then it cannot support local services in the area and so people will have to go further to get their daily needs and they will have to drive for many of the trips they will have to make. It would basically be getting lower densities and fewer local services and people having to use their cars more than they would do if it could support local services including public transport.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** Yes. We know that car dependency is bad for local economies and we have information that we can provide to show you that.

**Navin Shah AM:** Peter, from a transport perspective, what is your view on this?

**Peter Wright (Policy Manager, Transport for London):** Policy 6.1 does also link into table 6.1 in the London Plan, which is around this big strategic piece of investment, and the scale of the number of developments we are talking about will not have any effect on the strategic transport requirements for London.

It has been touched on in various examples already. It is an integrated approach of which the standards are only one part. Parking management is another. Design is another. Provision of other services or facilities for walking and cycling is another. All of those things will make an area attractive for public transport, walking and cycling. If there is less public transport available, then the car may be an appropriate mode in those locations.

Therefore, I do not think it undermines it, but there has to be an integrated way of looking at what should be provided in order to get a mix of modes. A car driver is also a cyclist is also a pedestrian and so you cannot say, just because there is a car there, it is the only mode that they are going to use.

**John Lett (Strategic Planning Manager, GLA):** Just to underscore what Mr Wright has said and at the risk of sounding as though I am in an examination-in-public, which one of my colleagues has indicated at the end here, you have to read the policy in the round. It says that "the Mayor will work with all relevant partners to encourage the closer integration of transport and development", through the schemes that Peter [Wright] has just mentioned in the proposals in 6.1, "encouraging patterns of development that reduce the need to travel, especially by car", which is what is promoted in your background note. That is essentially looking at the big bits of kit and the higher PTAL areas. We are looking at these exceptional, lowest PTAL areas where we do

need to have an integration of land use and transport and it has to be realistic. We have to recognise that in those sorts of areas there is a higher dependency on the motorcar because the big bits of kit - the big schemes in table 6.1 - probably are not going to bear on them in the same way as they will in the higher PTAL areas, almost by definition.

**Nicky Gavron AM (Chair):** Can I just come in? This policy could lead, as we have just heard, to lower densities, not higher densities. Lower densities mean we all pay because all the utilities and so on have to go further. Sprawl, as every single urban economist has proved, is expensive for all the citizens. There is something self-reinforcing about this because the lower the densities, the less you can make a case for proper public transport, even for a bus.

We have a situation where it was pointed out earlier that in Barnet the roads are going south. They are not in Haringey. You still have to take three buses to cross the borough east-to-west. We do not yet have a good enough bus service in outer London, let alone other transport. That does not mean that that is not an overarching objective of every single mayor to improve public transport.

What we are doing here is making that case much more difficult because there will not be the necessary demand. I really worry about us entrenching a policy that actually goes against so much of what the London Plan is about. Does anyone want to respond?

**Michael Bach (London Forum of Civic and Amenity Societies):** Yes. I would accept Mr Lett's suggestion and Mr Wright's suggestion that we are talking about things at the margin in both geographical and scale terms. If I can use a different metaphor, it is not the direction of travel that the plan is promoting. In other words, it is departing from the general direction.

We can have departures, but planned departures that are based on local evidence. It does not actually have to be promoted from the centre. We think that there is sufficient in the recent justification to tell people what they should take into consideration and, if it can be justified, adopt slightly different standards locally.

**Navin Shah AM:** Chair, also, there is this other factor. Whilst it talks about low densities in outer London, given the economic growth areas - for example, opportunity areas, etc - that we are promoting in outer London boroughs, there is certainly a case for better quality and an extension of public infrastructure. Should we not be using that opportunity to actually address the whole issue about the poor infrastructure and poor public transport that you come across in outer London boroughs? That will then respond to the whole issue about excess and sustainability as well. That is where it is dangerous to change a policy that says that you promote more generous parking standards because you have to look at the entirety rather than say *per se* that there is a case for low-density housing in outer London boroughs and therefore we should just have more parking spaces, which is what the new approach seems to be leading to.

**John Lett (Strategic Planning Manager, GLA):** We are not precluding improvements, possibly not in rail. There are only three big schemes on the stocks at the moment because that is the sensible way, but we do consider buses. We do not preclude an improvement in bus services --

**Navin Shah AM:** I am not saying you are precluding. What I am saying is, given that situation and given that scenario, is it really necessary or appropriate even to have the kind of wording we are using as against what has been promoted by the Outer London Commission?

**Nicky Gavron AM (Chair):** Jennette, do you want to come in?

**Jennette Arnold OBE AM:** OK. From what I have heard, it has been touched on, but can I just start by asking Peter Wright from TfL, based on his position in terms of how much clarity he can bring to this

discussion, a straightforward question? Will the policy significantly damage the prospect of securing better public transport for outer London? I have to declare an interest here as a representative of Chingford, Waltham Forest and Leyton, places where they are desperately in need of greater transport infrastructure. Can you tell us with some clarity what this policy will do?

**Peter Wright (Policy Manager, Transport for London):** The policy sets out that we should take into account existing PTALs and how connected they are currently and also in the future.

We have recently produced a new online way of presenting PTALs that looks at current PTALs and you can add in future scenarios. In the case of the constituents in the areas you are looking at, if there is a major development going in there, you can estimate what the future public transport accessibility will be, both on the rail schemes - and, as John [John Lett] says, there are not significant numbers of rail schemes - and also on bus services. For instance, Barking Riverside is an area where the modelling looks at the planned future bus network for the area and says, "This is the level of public transport that will be expected there", and that should be what you set your future parking standard on, not just on the existing. For all of the major developments and places like the opportunity areas, where you would be looking for much higher modal sharing --

**Jennette Arnold OBE AM:** This is west London, particularly.

**Peter Wright (Policy Manager, Transport for London):** Yes, west and north and down into Croydon as well. In those places, you would be looking for a much higher modal share of public transport, walking and cycling. Normally, you would be providing significantly more public transport in order to unlock them and that would be the scenario you would use to assess the future public transport accessibility. That would then mean that the funding would still be dependent on what you say the future PTAL requirements would be rather than on the existing.

**Jennette Arnold OBE AM:** That is for those areas we know about in terms of growth where the investment currently is, but what about those huge pockets of residential and whatever other use goes on there? The cry is for greater public infrastructure. Will this plan help or would that be a greater disadvantage?

**Peter Wright (Policy Manager, Transport for London):** The bus network is always under constant review and that will take into account the demand as new developments come on line with the housing that is available in them.

Going back to one of the points that we were talking about earlier, in many cases in arguments people will say that cars are being left at home and are not used, for instance, for commuting to work. There are various numbers that are reported in the evidence pack as well. A significant number of people do not use their cars for commuting purposes and they might use them for weekends or during the day. In addition to that, you would take into account what that demand is and then which bus services are already there and the additional requirements as more developments come online. That would be something that we take into account as we have more developments.

**Jennette Arnold OBE AM:** Can I just flag this up? I would not call it a phenomenon but it is a known activity where, for instance, a constituent of mine lives on the edge of Chingford and would drive then into, say, Leyton Park up in Leyton and take the Central Line or the accessible transport. How do you factor in the growth in an area in outer London, which is residential use? Do you just write them off and say, "Basically, you are going to have to either use your car for limited use or we can provide you with buses"? Is the option for them only going to be buses and cars?

**Peter Wright (Policy Manager, Transport for London):** Public transport provision does depend a lot on the amount of people who live in an area and the demand to where they are going. What you are describing is 'railheading', where someone might drive to an area and park. That would only be one option for those residents. If there is significant additional demand, then a bus service could be provided. Otherwise, various outer London boroughs, as part of the Mayor's Vision for Cycling, are investing heavily in cycling infrastructure - Enfield, Waltham Forest and Kingston - to have the cycling facilities to get people into those centres. That is just one part of the Mayor's vision, alongside the cycle Quietways as well, to try to improve access via cycling as well as public transport.

**Jennette Arnold OBE AM:** Develop these hubs, and then expect people to find their way into these hubs, a bit like Tottenham Hale, for that wider area?

**Peter Wright (Policy Manager, Transport for London):** Yes.

**Jennette Arnold OBE AM:** As well, I received a number of emails - when it was shown that I was substituting for the wonderful Mr Copley [Tom Copley AM] - from my activists and can you just clarify? What is the timeline in terms of TfL's plans and this London Plan? Can you just confirm how their timelines fit together?

**Peter Wright (Policy Manager, Transport for London):** I will hand over to John for clarity, but the London Plan has obviously been revised in the Further Alterations. With the Mayor's Transport Strategy, 2031 was the planning horizon. You had additional allowances for the population projections. You went slightly further now.

**John Lett (Strategic Planning Manager, GLA):** Yes. The Further Alterations take it through to 2036.

**Jennette Arnold OBE AM:** Yes, 2036, and the TfL plan goes to 2030.

**John Lett (Strategic Planning Manager, GLA):** It is 2031, I think.

**Peter Wright (Policy Manager, Transport for London):** 2031 was the Mayor's Transport Strategy.

**John Lett (Strategic Planning Manager, GLA):** We are now, as officers, looking at options for the next full review of the plan for a future mayor, and it looks very broadly as though the population projections of 75,000 a year, half as much again as we have had in historic plans, are OK, give or take, as far as one can tell. There is an issue about household growth. We think that might be out by about 5,000 a year.

**Jennette Arnold OBE AM:** This is the projected 10 million?

**John Lett (Strategic Planning Manager, GLA):** Yes. This is going forward to the 10 million.

**Jennette Arnold OBE AM:** Going forward?

**John Lett (Strategic Planning Manager, GLA):** Is it going to be sooner rather than later? That is the big issue for us. We are working with colleagues in TfL and elsewhere, trying to work out the most likely set of projections for the future growth that the future Mayor might want to consider and that then feeds back into the sorts of schemes that Peter and his colleagues in TfL are thinking about for moving people around London. At the moment we are looking at three big schemes: Crossrail 2, the Bakerloo line extension and the Gospel Oak to Barking Line (GOBLIN) at Gospel Oak. Those are the big three at the moment. Should we look at more? As officers, we are obviously thinking about it.

**Jennette Arnold OBE AM:** All right, because that makes sense and tries to put it into some context in terms of people out there who are livid and campaign and their concerns. Thank you for putting that on the record. You are indicating you had something to say, Mr McKee?

**William McKee (Chair of the Outer London Commission):** What I was going to say was this. The art of policymaking, which is what we are talking about, has to be grounded in a proper relationship between what is realistic and practical and what is theoretical and potentially unlikely.

**Jennette Arnold OBE AM:** And mayoral promises that cannot be met.

**William McKee (Chair of the Outer London Commission):** Yes. Could I use an example, just particularly picking up what you said? It is an extreme example and so do not laugh too hard.

If TfL had come to the Commission's deliberations and said, "We believe and it is in our plans that there is a realistic opportunity that, by the period of the plan, the density of bus network in outer London will be tenfold compared with what it is now", the Commission would have taken a different view. Also, the boroughs probably would have put to us a different view.

Of course we understand the theoretical relationship between transport and accessibility and between that and sustainability and a whole range of things, but what we are looking for is a realistic aspirational assessment of what is likely. We are not talking about Croydon. We are not talking about Bromley. I mean the town centres, not the boroughs. They have high PTAL ratings. They will get different parking standards applied to them than other parts of outer London. When you take a realistic view of what is likely to be the change that will happen in outer London - and John Lett just now was talking to us about only three rail schemes and so on - the assessment of the Commission was that it is not going to significantly alter. Against that background, the Commission made its views known.

This is not an argument about 'promote' or 'should'. This is just about how policy is related to the realities of planning the future growth of London and how London will develop in the future, and that is how we looked at it.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** If the reality is that nothing will change and everything will stay the same, then we do not need to change the London Plan. Actually, what is going to happen --

**William McKee (Chair of the Outer London Commission):** I did not say nothing would change. What I actually said was the density of public transport is unlikely to significantly change. Other things may change.

**Steve O'Connell AM (Deputy Chair):** It is basing policy on the real world, as opposed to an aspirational world.

**James MacColl (Head of Campaigns, Campaign for Better Transport):** Yes, which would dictate that you do not need to make these changes.

**Jennette Arnold OBE AM:** Yes.

**William McKee (Chair of the Outer London Commission):** Not in the slightest. No, that does not follow in the slightest.

**Nicky Gavron AM (Chair):** We are entrenched.

**Jennette Arnold OBE AM:** We are entrenched. Can I go to Mr McKee? I will take the two dynamics you have set out. I think you missed the third and that is the political dimension. It just seems to me that if your two dimensions were all there was, then that would be fine; we would live in a different world. There is a third dimension of politics and in London we have mayoral aspirants at the moment campaigning, as the Americans said, in poetry, which has little to do with the policies that they do introduce or follow. I am saying that in terms of - I do not know whether you met them - the longstanding, well-respected campaigners for the GOBLIN - a system that is so overcrowded it is a joke - who have been campaigning for 20 years because they knew that people were coming and that there would be this demand. Yet it seemed that it was below the radar of all your transport planners and everybody else or it was not significant enough. This is the reality that we face as politicians. That is why we are here today: to try to see if we can just bring a little bit more light to the matter. Thank you.

I have another question. People have talked about the demand for public transport and the business case for investment. I was a bit concerned when I heard about Berkeley being referred as a reference point because in two thirds of my constituency you are never going to find a Berkeley home. You would find other developers. I do not know how you factor in their research. This is just a point to make. Are the proposals likely to damage or affect the future relationship between the business case for investment and public transport? Can anybody bring any clarity to that?

**Michael Bach (London Forum of Civic and Amenity Societies):** At the lowest densities, the likelihood is that there will not be a business case for public transport.

**Jennette Arnold OBE AM:** That is right.

**Michael Bach (London Forum of Civic and Amenity Societies):** If the answer is to make it lower density still, it does not really help. Actually, getting to the point where you do have a business case is probably requiring higher densities than that. When you look at places - sorry, can I say Barking - and all opportunity areas, the problem is that public transport does not arrive before the people. The people have to come there and rely on what there is not, which there is no public transport, and so they do go to use their cars. That is going to be a problem with all the opportunity areas, where one of their problems has been that they have been poorly served by public transport. You do not get public transport, particularly high-capacity public transport, overnight. Buses are the only flexible short-term and medium-term option for most places and that will need a lot of fine-tuning. You can expand capacity as population grows, but you are not going to get any of the big projects going to many of these places unless they already have it or a large bung from the Chancellor of the Exchequer.

**Jennette Arnold OBE AM:** OK. Mr Lett, anything to put on record about this?

**John Lett (Strategic Planning Manager, GLA):** The realities of the relationship between public transport and investment and development are correct. The French system, which is held up as a paragon, is supposed to put the public transport in first. I am not altogether certain that they do, invariably. Is this a bad thing or not?

It is certainly the way London has been planned since the mid-1980s. London's macro level has done quite well since then. Our contribution to national gross domestic product (GDP) has gone up - I can remember from the mid-1980s - from around 12% to nearly 25%. The population has gone up from 6.7 million around about the mid-1980s to 8.6 million. Employment has gone up from just under 4 million just before the crash in 1990 to 5.6 million. This is not blueprint planning by any stretch of the imagination and it is not 'solutioneering', but the cumulative impact has supported the greatest growth in a city certainly in Western Europe.



I agree with Michael [Michael Bach]. In an ideal world we would put the transport in first, but the reality is that this sort of typical London way has not totally failed and some would say it has done quite well in aggregate. It does not mean to say that there have not been issues.

**Jennette Arnold OBE AM:** OK. Thank you.

**Nicky Gavron AM (Chair):** Thank you. Jennette, are you finished?

**Jennette Arnold OBE AM:** Yes.

**Nicky Gavron AM (Chair):** All right. We have to move on to housing standards. I would just like to say, though, that you have just talked about that world and we have heard about the third dimension. Will McKee, I actually do think the Outer London Commission's wording is helpful. What I do not think is that we should actually be ensuring that we do not have a tenfold increase in bus transport in outer London because we absolutely need --

**William McKee (Chair of the Outer London Commission):** We did not say you should not. What we said was it was likely.

**Nicky Gavron AM (Chair):** You are saying it was not realistic and we should be absolutely pushing for that. As John Lett has said, you always have to have the demand - and even latent demand, not just manifest demand - before you create the actual infrastructure itself. The concern is that we are only in parts of London, I agree, at the moment anyway, where what we are recommending - this is what the Mayor is recommending - is where there is a low PTAL rating, we should actually have lower densities and a greater land take for the lowest density service land user, which is the car, and we should up the value of homes, which is quite worrying. I do not know. I would say to Steve [Steve O'Connell AM] that what we have now is probably in the spirit of localism because it allows boroughs to be flexible. That is not saying you should promote more generous parking. It is saying you can where you want to.

**Steve O'Connell AM (Deputy Chair):** Out there, there is a problem that we have talked about at length, leading to stalling in regeneration in district centres --

**Jennette Arnold OBE AM:** Poor Croydon.

**Steve O'Connell AM (Deputy Chair):** -- and other issues, partly because there is no significant parking. We have debated it fully and it has been an excellent debate.

**Nicky Gavron AM (Chair):** All right. You have given us a lot of information and a lot of expertise and good discussion so that we can actually form a report that reflects the different opinions and that will be our response in the consultation that goes in next week. Thank you all very much for that.