

***Question f: Does the policy rise sufficiently to the currently inherent challenges of longer trips, greater car dependency and reducing carbon emissions?***

## **1. Analysis**

- 1.1 The LSDC is of the view that it is important to address the particular transport issues that arise in seeking increased opportunities in outer London. Car use will continue to be the main means of transport in the lower density suburban areas, but it is possible to reduce trip lengths and enable a transfer of trips to non car use (and thus reduce emissions) where new development and regeneration is focused and integrated with improvements to public transport, cycling and walking, and continued controls on parking provision.
- 1.2 There is evidence that introduction of high quality public transport such as the Croydon tram can result in significant change in travel behaviour. Between 1999 and 2001 car usage by residents within 800 metres of the tram stop at New Addington dropped from 59% to 32% for weekday journeys, and from 72% to 41% at weekends (Core Document RD36: pages 5-6).
- 1.3 This would suggest that there would be benefits in focusing outer London development in locations where:
  - The public transport ‘hub and spoke’ concept, suggested by the Outer London Commission (Core Document LD19a: page 156), can be extended to cover the wider hinterland of the centre;
  - There are existing plans to provide significant improvement to public transport for instance in relation to Crossrail, Thameslink and Chelsea-Hackney line (see London Plan: Map 6.1) – providing improved

access to centres such as Croydon, Stratford, Brent Cross, Southall and Ilford.

1.4 At the same time it would be important not to encourage increased car use by a significant increase in parking provision:

- There is a major disparity in parking standards for B1 office uses between place in London such as Hillingdon (Core Document RD37: page 312) at 1 space per 100 sq.metres and those outside London such as Slough (Core Document 38: Appendix 2) at 1 space per 40 sq.metres.
- If parking standards were equalised to the maximum of the South East Plan standard (1 space per 30 sq.metres) there could be up to three times the amount of parking in future outer London development. This suggests that there should be caution in relaxing outer London standards.

## **2. Conclusion**

2.1 Our view is that it is vital to ensure that any significant development in outer London is closely integrated with improvements for walking and cycling in the local area, and for public transport both locally and more strategically. In a period of reducing resources it is likely that this will mean that such developments should be concentrated in a few locations that are already well served or benefit from schemes that are already prioritised or committed.

2.2 In this context we suggest that Policy 2.8 is strengthened by adding a new sub section between existing a and b:

*b prioritising those public transport improvements that would support significant changes in town centres and other key locations as identified through sub regional policy development (see Policy 2.6)*

- 2.3 It is important to retain the criteria in Policy 6.13 E d that need to be demonstrated in a DPD by an outer London borough wishing to pursue a more generous parking standard (including the limitation to areas of regeneration need). It is also important for the Implementation Plan to include a reference to monitoring of the implementation of this policy.