

**London Plan Examination**

**London Borough of Bexley (respondent number 2722)**

**Statement on Matter 81**

**M81 Are all of the requirements of policies T6 and T6.1 to T6.5 necessary to address the strategic priorities of London, or do they extend to detailed matters that would be more appropriately dealt with through local plans or neighbourhood plans?**

- 1.1. The requirements outlined in draft policies T6 and T6.1 to T6.5 are very detailed and should be dealt with locally. They are unlikely to be implemented in all London boroughs without giving rise to significant problems, owing to the great difference in environments between inner London and outer London, as well as between individual boroughs themselves. Most of the requirements listed will only function well in inner London, particularly the Central Activities Zone (CAZ). Bexley is an outer London borough with relatively poor public transport connections (average PTAL is 1b<sup>1</sup>) owing in part to radial rail routes and very few orbital bus routes, resulting in a greater reliance on private vehicles for local journeys.
- 1.2. A crucial argument when assessing parking standard particularly in Bexley is public transport investment. Research has shown that car ownership levels can be reduced where there are high levels of public transport availability. So, an investment in public transport would likely decrease the demand for car parking. Bexley needs a high investment of public transport to counteract car ownership levels<sup>2</sup>. Many of the detailed matters set out in policies T6 and T6.1 to T6.5 and their supporting paragraphs are inappropriate in this context.

**a) Should the Plan allow local plans and neighbourhood plans to apply the maximum car parking standards flexibly to take account of local evidence including about car ownership and use; parking stress; public transport; walking and cycling; the scale, mix and design of particular developments; the character and appearance of an area; and economic viability?**

- 1.3. Yes, they should. Maximum parking standards may work very well in inner London boroughs, as the connectivity and public transport infrastructure is sufficient to reduce the reliance on cars. However, in outer London boroughs, particularly in environments like Bexley, which has one of the highest car ownership levels in London, the use of maximum parking

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<sup>1</sup> TfL Datastore. Average PTAL for London Boroughs (2015). <https://data.london.gov.uk/dataset/public-transport-accessibility-levels>

<sup>2</sup> Cushman and Wakefield. Driving Factors (2018). p. 9.

standards leads to significant problems<sup>3</sup>, including additional on-street parking stress with associated amenity and highway safety issues. Hence it is vital that local standards are used to reflect local circumstances to ensure that there is a better chance to deliver the aims of the Mayor's Transport Strategy.

- 1.4. Research undertaken by Department for Community and Local Government suggests car parking provision should be based on dwelling size, type and tenure<sup>4</sup>. In the current London Plan parking standards are based on dwelling size, which is an appropriate criterion. In the draft Plan maximum residential parking standards do not consider unit size, and a one-size fits all policy has been applied solely based on PTAL classifications. It is wholly inappropriate to suggest that the same amount of parking is appropriate for a one-bedroom flat and a five-bedroom house. Research has also suggested not just the size of dwelling, but the tenure type should be considered in parking provision as affordable homes tend to have lower car ownership levels<sup>5</sup>.
- 1.5. PTAL is not an accurate reflection of the connectivity to local amenities. Research has also concluded that there is no direct relationship between PTAL and car use<sup>6</sup>.
- 1.6. In relation to the link between car ownership and use in residential areas, reports have also shown that there is no correlation between levels of car ownership and levels of recorded car use. In addition, higher levels of car parking have not led to an increase in car usage during peak travel times due to many vehicles being stored for use in evenings or at weekends<sup>7</sup>.
- 1.7. The Council recommends in Table 10.3 of the draft Plan in the case of outer London boroughs that the maximum of 1.5 spaces per unit should extend above PTAL 0-1, so it covers areas with PTALs between 0-2 in recognition of the remoteness from services and lack of connectivity of these areas. In areas with a PTAL of 3 or 4 there should be flexibility to allow a higher parking provision for larger units.
- 1.8. For uses where no standard has been suggested the Council agrees with the proposal in paragraph 10.6.4 for a case-by-case approach considering the general principles of the policies as well as public transport, walking and cycling connectivity. Such uses include non-office business uses such as industrial and distribution/storage (B2 and B8), hotels and residential

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<sup>3</sup> Fei Li and Zhan Go. Do Parking Standards Matter? Evaluating the London Parking Reform with a Matched-Pair Approach (2014). p. 23.

<sup>4</sup> Department for Communities and Local Government. Residential Car Parking Research (2007). p. 6.

<sup>5</sup> 21st Century London Living Update. Travel Research Survey (2010). p. 17.

<sup>6</sup> Ibid.

<sup>7</sup> The Berkeley Group. Does Car Ownership Increase Car Use? A Study of the use of car parking in residential schemes in London (2011). para. 5.1.2.

care homes? (C1 and C2), as well as non-residential institutions and assembly/leisure (D1 and D2). The suggestion in paragraph 10.6.6 that the general principles outlined in paragraphs 10.6.3 to 10.6.5 are applicable to a range of parking standards are not accepted by the Council. The justification of parking for developments in these use classes should be through a transport assessment. This should consider the potential for public transport person trips as well as those on foot or by cycle informing the parking demand, with parking need being established after the consideration of available parking in that location.

- 1.9. Given the differences between individual outer London boroughs, the suggestion that maximum parking needs for retail and office developments can be based on a general outer London location is not accepted; the starting point for those uses must be linked to local PTAL values along with cycling and walking infrastructure and parking availability as it is with standards for residential use.
- 1.10. The maximum parking standards for retail uses in Table 10.5 gives a standard for all outer London boroughs below 500 sqm, which is the same as for inner London and Opportunity Areas. However, there could be specialist stores within the smaller floorspace range in outer London that could be trip attractors in their own right rather than catering for visitors on a shared-visit, and any justification in a transport assessment must be considered as part of the assessment of such proposals.
- 1.11. In several recent developments in Bexley there has been an under provision of on-site residential parking, resulting in an overspill of indiscriminate parking with adverse impacts on the surrounding areas. This has also occurred in respect of commercial developments, with overspill parking affecting other units as well as surrounding residents. The suggestion that parking controls should be implemented for on-street parking is unfair and will not be sufficient to control overspill from a new development. This will cause frustration for both new and existing residents, the latter in particular being penalised just for living close to a new development, as well as inflicting cost on the Council in the form of administration and appropriate enforcement. In addition, legislation for the promotion of waiting and loading restrictions falls outside the planning process, making the delivery of any such controls far from certain.
- 1.12. 'Car-free' development is very difficult to achieve without consequential issues in boroughs like Bexley, and although opportunities will be taken where there are suitable alternative modes to the car available, such as public transport or attractive cyclable routes, ensuring that adequate provision is made for the disabled means that in Bexley, residential developments of more than 10 units tend to be 'car-lite.'

- 1.13. The provision of disabled parking is vital to ensure Bexley is accessible for all residents and people travelling to the borough. A minimum level of general disabled parking (normally 4% in Bexley) is required for most developments for occupiers and visitors, whilst greater (1:1) provision is expected in the case of wheelchair accessible homes for those with a 'blue badge'/impaired mobility. The inclusion of life-time homes in some so called 'car-free' developments has led to issues where developers do not consider disabled parking is required owing to the 'car-free' term.
- 1.14. The Council's approach to on-site disabled parking enables new developments to be accessible for all. However, the process of implementing parking spaces on the highway, which is often suggested as a means for securing a car-free development where occupiers require disabled parking, is subject to public consultation and requires changes to Traffic Management Orders. Moreover, as the highway is not under the control of the development, public on-street parking could be altered or removed in the future while the development continues to operate.
- 1.15. There is a concern that the wording of draft policy T6 requires a Car Parking Design and Management Plan (CPDMP) for all scales of development. In practice, a CPDMP will have little to no impact on smaller developments, which are also unlikely to have any viable or sustainable mechanisms in place to ensure future management. The thresholds should therefore be altered so that the policy applies only to developments of an appropriate size, or in particularly sensitive locations for on-street parking.
- 1.16. The Council agrees with the requirement in draft policy T6.1(B) to lease rather than sell communal on-site car parking to occupiers; however, leases be reviewed and renewed on a regular basis to ensure that re-purposing of parking spaces in the future is not precluded.
- 1.17. The requirement in paragraph 10.6.3 to use the highest existing or planned PTAL level for developments will also create issues when applying maximum parking standards. For example, Bexleyheath Town Centre has a highest existing PTAL level of 5 but is wholly reliant on bus services for public transport. The proposed standards would suggest that new development would be car-free, which is simply not feasible in such an area.
- 1.18. In relation to the term 'planned PTAL' further clarification is needed as the Council needs to be confident that the 'planned PTAL' will be achieved particularly where a development is dependent on this factor. For example, Crossrail has been further delayed from its initial commission date of December 2018, while the cancellation of the Greenwich Waterfront Transit in 2009 left developments with inappropriately low car parking based on

the predicted increase in PTAL, as well as the need to find a sustainable use for formerly safeguarded land.

- 1.19. The proposal in draft policy T6.I that, where sites are redeveloped, existing parking should be reduced to the standards set out in the draft Plan rather than re-provided at existing levels should be amended to make it clear that it does not apply to extensions to existing developments, to avoid conflict with or contradict conditions placed on previously approved planning applications. In areas where access to public transport and local amenities is very limited, parking should be provided in accordance with local standards for redevelopment other than extensions to existing developments.
- 1.20. Paragraph 10.6.7 confirms that motorcycle parking should be evaluated on a case-by-case basis. However, the suggestion that one motorcycle parking space can equate to one car space as part of the maximum for the site is not accepted, as a motorcycle would normally accommodate up to 2 person-trips and a car can accommodate up to 4-5. Therefore, they are not comparable and should not be assessed on a 1:1 basis. An assessment of motorcycle and car use should be undertaken as part of the transport assessment, and appropriate levels of both provided initially and be subject to monitoring and review.
- 1.21. Clarification is sought as to what is meant by 'large-scale purpose-built shared living' in policy T6.1E, as this could include residential accommodation for the elderly.

**b) Are the requirements of policies T6 and T6.1 to T6.4 relating to the provision of infrastructure for electric or other ultra-low emission vehicles justified and consistent with national policy?**

- 1.22. The requirements of policies T6 and T6.1 to T6.4 in relation to provision of infrastructure for electric vehicles and ULEV appear to be consistent with emerging national policy, however there are many factors affecting the switch to these vehicles that vary significantly from borough to borough<sup>8</sup>, including income differentials affecting take up rates and the uneven roll out of infrastructure.
- 1.23. Further clarification is also required over what is meant by 'passive provision', so developers are clear about how much of the total charging system needs to be installed initially to comply with this, as well as clearer, universally understood technological terms.

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<sup>8</sup> Dept. for Transport, 2013, Driving the future, today – A strategy for ultra-low emission vehicles in the UK