

Respondent No 1195 The Retirement Housing Consortium

Draft London Plan

Car Parking Standards

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? In particular:

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?

The NPPF makes it clear that Parking Standards are set at Local Plan level and not at Neighbourhood Plan levels.

This policy must include flexibility for various different development typologies such as retirement uses which reflect the requirements of the end user.

Flexibility is required for older people's accommodation parking standards to reflect the car use of residents as well as the location of the site. In general, the DLP should apply flexibility for older people's housing proposals recognising the difference between older people's housing proposals and general needs housing. Car ownership levels and use are often lower for specialist forms of older persons accommodation. However, some older people may be more reliant on the car than the younger population and mobility can assist with independence and well-being. This reflects the importance of maintaining flexibility in the imposition of parking standards.

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?

The NPPF (2019) expects the preparation of policies which *"ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles"* and expects planning applications to include them. To insist that *"all operational parking should make this provision"* in London patently is unnecessary and is not consistent with national planning policy.