







Respondent No 1195 The Retirement Housing Consortium

Draft London Plan

Car Parking Standards

Car Parking: Residential

M82. Is the approach to non-disabled persons residential car parking set out in policies T6 and T6.1A-F justified, and would it be effective in helping to helping to achieve sustainable development? In particular:

a) Are the maximum standards set out in Table 10.3 justified?

This policy must include flexibility for various different types of proposals which reflect the requirements of the end user.

Table 10.3 - Maximum residential parking standards does not differentiate between the size or type of dwellings. It is clear that the parking needs of different sized residential dwellings will vary, and the policy is not drafted to reflect this. It does not address the different needs associated with different forms of housing such as specialist accommodation for older people and extra care accommodation.

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.

It is abundantly clear the parking requirements of specialist accommodation for the elderly are different from those of general needs housing. By not providing clear and appropriate guidance for these forms of accommodation the Mayor is proposing an unrealistic and unjustifiable maxima in parking standards.

It is also unclear how the Parking Standards for Extra Care Accommodation (Use Class C2) apply as it is not included within the C2 Parking Standards.

b) Is the requirement for all large-scale purpose-built shared living, student accommodation and other sui generis residential uses to be car-free (other than disabled persons parking) justified?