

Written Statement for the London Plan Examination in Public – Matter 84

Transport for London (1170) March 2019

M84. Is the approach to parking for non residential uses set out in policies T6 and T6.2 to T6.5 justified and would it be effective in helping to helping to achieve sustainable development?

In particular,

- a) Are the maximum standards for offices set out in Table 10.4 justified?
- b) Is the approach to commuter and operational parking for industrial and storage or distribution uses set out in policy T6.2C and T6.2F justified and consistent with policies E4-E7?
- c) Are the maximum standards for retail set out in Table 10.5 justified?
- d) Is the approach to hotel and leisure uses parking set out in policy T6.4 justified?
- e) Are the standards for non-residential disabled persons parking set out in Table 10.6 justified?
- f) Is the requirement for existing parking provision to be reduced to meet the maximum standards when sites are redeveloped justified (policy T6I)?
- g) How would the approach to non-residential car parking affect the objectives of policy GG5 “growing a good economy” and the vitality and viability of town centres in the context of policies SD6-SD9 and E9?

1. INTRODUCTION

- 1.1. The approach to non-residential car parking is justified, consistent with national policy and necessary to achieve sustainable development in London. Parking provision at a non-residential development affects the form of that development, how it fits into its local environment and how its users access it. The Plan seeks to direct development toward well connected areas. In conjunction with parking restraint, this is a key means by which we can minimise the additional congestion, emissions and health impacts generated by development.

2. APPROACH TO NON-RESIDENTIAL PARKING AND NATIONAL POLICY CONSISTENCY

- 2.1 The approach to non-residential parking is justified and essential to ensure new offices, shops and other destinations in London are delivered in a sustainable way, and without such an approach in London, the impacts of expected development would be likely to be unmanageable in transport terms. The approach reflects the city’s extensive public transport network, while taking account of the availability of alternatives in different areas of London.
- 2.2 **Reducing destination parking provision is a key element of ensuring sustainable development in London.** Parking provision is closely linked to use, and car use generates a host of negative impacts¹ which need to be managed and addressed, including congestion, noise, poor air quality, climate change, severance and road

¹ Further detail is set out in section A of the Residential Car Parking evidence paper (NLP/TR/003)

danger, as well as less physical activity among those using them, but also those impacted by them, which contributes towards health inequalities. In delivering the Mayor's Transport Strategy, public transport, walking and cycling will become more attractive options for more people to more destinations. This will make more feasible car-free/lite development and underpins both mode shift and improving the attractiveness to alternatives to the car.

2.3 As set out in our statement on M81, the parking policies of the Plan, including T6.2-T6.5 are **supported by the National Planning Policy Framework (NPPF) (2012)**. In particular, the NPPF sets out a number of factors in paragraph 39, all of which have been reflected to at least some degree in the various standards:

- Accessibility/availability of public transport/local car ownership levels: the various non-residential standards take into account a number of geographical designations that reflect these aspects, in particular areas of high PTAL and central, inner or outer London (with car ownership and use generally being higher in the latter)
- The need to reduce the use of high-emission vehicles: as London has some of the worst air quality in the UK, the standards apply restraint that reflects the availability of alternatives to reduce the use of polluting vehicles²
- Type, mix and use of development: different standards are applied across different uses and more widely the Plan encourages mixed-use development to reduce the need to travel by car

2.4 The NPPF allows for maximum standards where there is 'clear and compelling justification' for managing the local road network', and in the case of the 2018 NPPF, to 'optimis[e] the density of development in city and town centres and other locations that are well served by public transport'. There is certainly clear and compelling justification for managing London's road network – London has the highest levels of congestion in the country and it – and its associated impacts – pose one of London's biggest challenges. Meanwhile the majority of the city would be considered dense and well connected by public transport viewed in a national context. Therefore in the London context, parking maximums are appropriate and necessary pan-London, as we set out in more detail in our statement on M81.

3. OFFICES AND INDUSTRIAL USES

3.1 The maximum standards for office development are necessary to support the high employment densities that underpin much of London's economic success, and to minimise its impacts. Commuter journeys made by car, up to five days a week during peak congestion have significant impacts and, where possible, it is important to reduce this. Employment in London tends to be located in well connected areas, with three quarters of Londoners working in areas of PTAL 4-6³ and commuting in these locations

² It should be noted that three quarters of road transport particulate matter emissions come from tyre and brake wear (MTS Challenges and Opportunities report) which affect even electric vehicles and thus some reduction in car use is necessary to improve human health

³ Reflecting the economic importance of wide catchments of skilled labour – the public transport network being a key facilitator of this.

is predominantly made by walking, cycling and public transport.⁴ In particular, it is justified for new offices in the Central Activities Zone (CAZ) and inner London to be car-free (with the exception of disabled persons parking) given the extent of public transport, cycling and walking available; the significant monetary and opportunity costs of parking provision in these locations; and the very high impacts and externalities of additional car trips. Several inner London boroughs already require offices to be car-free and most applications that have been referable to the Mayor in the last two years have not included any general parking.

- 3.2 In outer London, the office standards reflect a greater role for car travel, reflecting the different context. In most outer London areas, the proposed maximum standards are not a departure from previous policy. In outer London Opportunity Areas, more restraint is required and possible, reflecting the opportunities to design for walking, cycling and public transport use from the outset and a particular need to mitigate traffic impacts given the scale of development concentrated in these areas. Flexibility is also given to boroughs who wish to seek more generous standards under certain conditions.
- 3.3 Commuter parking at industrial, storage or distribution uses is assessed on a case-by-case basis, with regard for the office parking standards while taking into account the considerably lower employment densities (i.e. less parking is required per square metre) and differences in trip making patterns (e.g. that might arise from industrial uses being in less well connected locations than a typical office development or from shift working for example). Operational parking (e.g. for goods vehicles) is considered separately and is also determined case-by-case. This approach reflects the widely varying requirements of such parking depending on site location and intended use and as such is justified.

4. RETAIL AND TOWN CENTRES

- 4.1 The Plan aims to steer new retail development towards town centres, where existing public transport connectivity is greater and also where future housing development will increase the immediate catchment of customers able to access stores by foot. This builds on existing travel patterns - 56 per cent of Londoners' shopping trips are to destinations in PTAL 5-6, while 44 per cent⁵ are made on foot. The retail parking standards start with this context and do not seek to cater for higher provision that might be sought in less well connected areas, which would generate additional car trips (and the associated congestion and emissions) and undermine the Plan's town centre first approach. Car dependent retail poses significant and particular problems in the London context.
- 4.2 Furthermore, shopping patterns and retailing models in London have changed significantly in the last decade: between 2006 and 2016, Londoners made over a third fewer shopping trips per day by car while more recently.⁶ These patterns have been reflected in changing services from retailers – such as Waitrose's 'Shop in branch, we

⁴ London Travel Demand Survey

⁵ London Travel Demand Survey

⁶ London Travel Demand Survey

deliver'⁷ and Iceland's free next day delivery for orders over £35.⁸ New retail formats from some of the traditional 'big box' retailers utilise showrooms in well connected locations (such as Ikea⁹ in Stratford's Westfield or Tottenham Court Road) with orders that are delivered to customers' homes, reducing demand for on-site parking. 'Click and collect' services can also reduce the duration of parking compared to traditional shopping trips, reducing the total number of spaces required. Partly as a result of some of these changes, we have seen an increasing number of applications for redevelopment of retail car parks, demonstrating that in light of changing retail patterns, the historic approach can now be seen as over-providing in some areas, and that space is more valuably used by non-parking uses. A combination of online deliveries for larger purchases (many of which do not fit in most cars) and small, more frequent purchases (supported through development patterns that locate residents nearer stores) can enable most potential retail customers to meet their shopping needs without a car.

- 4.3 Given this context, the standards apply restraint in the most accessible areas of London, namely the CAZ and areas of PTAL 5-6, where developments should provide no new car parking (with the exception of disabled persons parking). Even in outer London town centres (which often have areas of PTAL 5-6), almost half of shopping trips are walked or cycled, while most made by car are done so over short distances¹⁰ (meaning they can often be switched to other modes).
- 4.4 It is also worth noting that many town centres have existing public parking available, enabling some customers to access retail developments by car, which Parts B and C of Policy T6.3 aim to ensure is properly considered. Making best use of such parking and obviating the need to use more land for surface parking or build costly basements bring many benefits, but furthermore, some of this existing parking may be better used in other ways. In Policies H1 B 2 b and SD7 B 5 a the Plan points to surface parking and car parks to be redeveloped for housing or other uses, optimising the development potential of well connected sites and supporting the delivery of Healthy Streets by reducing the potential for inactive frontages created by parking.
- 4.5 Outside these areas, the standards do enable additional general parking provision, with higher maximums for larger retail development in outer London (outside of Opportunity Areas) reflecting the greater role of the car in these areas.
- 4.6 This approach seeks, as appropriate, to influence future retail patterns to reduce the impact of these activities on congestion, emissions, public health and the surrounding urban realm surrounding these shops. The Policy provides a clear, simple framework for provision that takes account of the level of alternatives in different areas of London.

⁷ Waitrose online grocery information, https://www.waitrose.com/content/waitrose/en/home/about_waitrose/our_company/online-grocery-delivery.html

⁸ Iceland delivery information, <https://www.iceland.co.uk/free-delivery/>

⁹ IKEA's website listing its London stores states 'We try to make sure all of our stores are well connected. Please pick the most sustainable travel option for you' and the retailer is starting to prioritise accessible city centre locations: <https://www.citylab.com/life/2018/12/ikea-locations-downtown-american-cities-suburbs/576952/>

¹⁰ Only 4 per cent of Londoner's shopping trips to outer London town centres are made by car and are over 5km (London Travel Demand Survey)

- 4.7 The approach to retail and other non-residential parking supports policy GG5 Growing a Good Economy and complements policies SD6-9 and E9¹¹. It will also contribute to the vitality and viability of London's town centre network by supporting increased agglomeration and economic activity as well as attractiveness. This is only possible overall through a transport network that moves workers, customers and visitors into an area efficiently, which is not possible with high levels of car access. In contrast to historical notions of car access enhancing vitality, this fundamental principle – **active travel and public transport as the overwhelming choice for personal travel** – has allowed central London and areas of inner London to generate particularly high levels of economic output, enabled by high employment densities and supported by extensive public transport connectivity and capacity.
- 4.8 The approach to non-residential car parking also supports public realm improvements that can increase the attractiveness of town centres as destinations, particularly for retail customers (who predominantly travel by foot¹² and tend to spend 40 per cent more over the course of a month than those who drive¹³). The recent 'Street Appeal' report¹⁴ found that where public realm improvements took place, office and retail rental values rose and retail vacancy rates declined by 17 per cent. The approach to non-residential parking therefore makes a crucial contribution to growing London's economy and supporting the vitality of its town centres.

5. OTHER NON-RESIDENTIAL REQUIREMENTS

- 5.1 Parking at hotel and leisure uses follows a similar approach to the previously established practice, but sets out requirements more clearly. This limits provision in PTAL 4 – 6 for non-disabled guests (operational parking such as for taxis is permitted on a case-by-case basis), reflects the extent of alternatives. In areas of PTAL 0-3, proposals are assessed on a case-by-case basis.
- 5.2 The non-residential disabled persons parking standards in Policy T6.5 and Table 10.6, are based on national guidance. Paragraph 10.6.18 was amended under the Minor Suggested Changes to clarify that appropriate provision (assessed on a case-by-case basis) is required even where no general parking is provided.
- 5.3 The requirement for redeveloped sites with existing parking to meet the standards is necessary in most cases to ensure that historic high levels of parking are not re-provided. This prevents unacceptable traffic and health impacts and makes the most effective use of land. We do however recognise a potential risk of dis-incentivising mixed-use redevelopment of retail sites to provide additional housing in less well connected locations. In response to comments received in the public consultation, the Minor Suggested Changes address this by allowing some flexibility in such cases.

¹¹ Draft London Plan Policies: Policy SD6 Town centre and high streets, Policy SD7 Town centres: development principles and Development Plan Documents, Policy SD8 Town centre network, Policy SD9 Town centres: Local partnerships and implementation and Policy E9 Retail markets and hot food takeaways

¹² London Travel Demand Survey

¹³ Walking Action Plan, 2018

¹⁴ Street Appeal: The value of street improvements Summary Report (2017) Carmona, MP; Gabrieli, T; Hickman, R; Laopoulou, T; Livingstone, N, Progress in Planning, <http://content.tfl.gov.uk/street-appeal.pdf>

6. CONCLUSION

- 6.1 Parking restraint is vital to securing more sustainable non-residential development in London and ensuring the city is improved for both people and businesses. It is also central to ensuring the best use of land in well connected locations, supporting vibrant and economically successful town centres and enabling London's employment hubs to continue to grow, making use of existing transport infrastructure. It also enables investment in public transport and active travel to increase inclusive access, reduce journey times and create a healthier, more resilient city.