

London Plan Examination in Public – Written Statement

Respondent Number	1851
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Dated	1 March 2019

Matter 81-85

Car and cycle parking standards

Responding to:

Car Parking

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?

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 achieving sustainable development? In particular:

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

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?

Key points:

- Policy T6 - Flexibility on maximum car parking standards is not necessary to permit parking about the maximum.
 - Support should be given to boroughs who seek a lower maximum.
- Table 10.3 should have consistency in maximum residential parking standards for Inner and Outer London.
 - Outer London Opportunity Areas should be developed using a combination of ATOS and PTAL to ensure they incorporate active travel and reduce the need for car use.
- Policy T6.1 B - Leasing of car spaces should not become a block on converting car parking to cycle parking or a means for leasing cycle parking space.

Evidence and further information: [H2]

I welcome that Policy T6 B proposes that “Car-free development should be the starting point for all development proposal in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’).

However, this is being undermined by the detail of this policy, with Outer London sites allowed to provide a higher level of parking compared to Inner London. This inconsistency means that sites that are in easy access of public transport from PTAL level 4 are being allowed up to 0.5 spaces per dwelling. Similar leniency is applied to Outer London Opportunity Areas. This is not rational. Where PTAL values are lower still I would question the desire to build new housing and create new car dependency.

Public Transport Accessibility Level assessments (PTAL) do not take account of all the ways that development can be planned in accordance with the Mayors Transport Strategy to enable active travel and reduce car use. Access to Opportunities and Services (ATOS) assessments do take account of what is at the end of journeys, take account of good walking and cycling provision and provide for a better assessment of whether measures to provide more local services or improvements to public transport might be needed in an area.

Suggested change to Table 10.3 (~~deletions~~ and **amendments**):

Location	Maximum parking provision*
Central Activities Zone Inner London Opportunity Areas Metropolitan and Major Town Centres All areas of PTAL 54 – 6 Inner London PTAL 4	Car free~
Inner London PTAL 3	Up to 0.25 spaces per dwelling
Inner London PTAL 2 Outer London PTAL 4 Outer London Opportunity Areas	Up to 0.5 spaces per dwelling
Inner London PTAL 0 – 1 Outer London PTAL 3	Up to 0.75 spaces per dwelling
Outer London PTAL 2	Up to 1 space per dwelling
Outer London PTAL 0 – 1	Up to 1.5 spaces per dwelling △

* Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed

~ With the exception of disabled persons parking, see Policy T6.1 G 1

△ Where small units (generally studios and one bedroom flats) make up a proportion of a development, parking provision should reflect the resultant reduction in demand so that provision across the site is less than 1.5 spaces per unit

Policy T6.1 B proposes that “Parking spaces within communal car parking facilities (including basements) should be leased rather than sold.” Consideration should be given to how this approach will work, pressure on cycle parking space merits the conversion of car parking to provide more cycle parking. Cycle parking space leases are likely to cost more in administration than they would achieve. Therefore, such space should be provided to all

residents or focussed upon the most pressing needs such as those of Disabled cyclists or those using non-standard cycles.

Suggested addition to 10.6.12A:

Consideration should also be given to conversion of leased car parking spaces to cycle parking.