

Respondent No 1195 The Retirement Housing Consortium

Draft London Plan

Car Parking Standards

Cycling

M85. Is Policy T5 justified and consistent with national policy, and would it be effective in helping to helping to achieve sustainable development? In particular:

a) Are all of the requirements of Policy T5 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?

No, The DLP should give some discretion to the local authority on this matter. The draft policies are far too prescriptive for a strategic document and must be removed or amended to reflect site by site considerations, as well as local planning authority considerations on a case by case basis.

b) Are the minimum cycle parking standards set out in Table 10.2 justified?

No, the unnecessary imposition of this policy where there is clearly little, if any requirement for such provision would put at risk the delivery of viable older people's proposals in our view. Where specialist accommodation makes provision for mobility scooters, a lower level of discretionary cycle spaces should be considered.

The policy does not reflect the unique circumstances and design requirements for specialist accommodation for the elderly and instead of increasing supply in London, is likely to reduce it even further as putting an unnecessary burden on the delivery of such accommodation. Table 10.3 states that sites of 1 and 2-bedroom apartments should provide 1.5-2 cycle spaces. It is firstly important to note that the occupancy levels of these units in retirement housing also do not reflect the typical occupation of open market housing.

McCarthy & Stone's independent research indicated that for residents living within 'Retirement Living' apartments, the cycle ownership rate is 0.0157 (approximately 1 cycle per 63 apartments). Each development delivered by the Retirement Housing Consortium contains a dedicated cycle and mobility scooter store where a number of cycles can be stored. As this policy does not allow for different forms of accommodation to install cycle parking in accordance with its likely use for a typical retirement housing scheme of 30-40 units this policy would dictate that 60 cycle spaces would need to be provided. This would mean that a large dedicated store of cycles, where they are rarely used would need to be provided at cost to the developer.

The unnecessary imposition of this policy where there is clearly no requirement for such provision would put at risk the delivery of viable older people's proposals in our view. Where specialist accommodation makes provision for mobility scooters, a lower level of discretionary cycle spaces should be considered.

c) Should the Plan allow local plans and neighbourhood plans to apply the minimum cycle parking standards flexibly to take account of local evidence?

Yes.