

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 achieve sustainable development?

- 82.1 Yes, the approach to non-disabled persons residential car parking is justified and necessary to address the challenges that London faces – including congestion, poor air quality, a need to reduce carbon emissions and improve public health – and the delivery of Good Growth. Historic levels of new parking provision cannot continue if these challenges are to be addressed while housing delivery is significantly increased to accommodate a growing population.
- 82.2 Future levels of car use (which has a clear relationship with car ownership and parking provision¹) will have a profound impact on whether the Mayor is able to meet his duties under the GLA Act 1999 (including in relation to health, climate change and air quality) and whether TfL is able to meet its duties to manage the road network under the Traffic Management Act 2004. There are also national and international obligations to reduce carbon emissions², alongside the Mayor's objective of London being a zero-carbon city by 2050 that is set out in the London Environment Strategy. This will require not just a switch to low emission vehicles, but also a reduction in car use overall.
- 82.3 It is imperative that the approach to car parking, ownership and use in London has clear strategic direction and underpins, rather than undermines, the ability to tackle the challenges the city and UK more widely face. This will require the approach set out in Policies T6 and T6.1 and will, in parallel, be supported through continued provision of and investment in public transport and active travel infrastructure, as set out in the Mayor's Transport Strategy (MTS).
- 82.4 The approach to residential parking is consistent with and supported by the National Planning Policy Framework (NPPF) 2012. Paragraph 39 of the NPPF 2012 states that:

'If setting local parking standards for residential and non-residential development, local planning authorities should take into account:

- *the accessibility of the development;*
- *the type, mix and use of development;*
- *the availability of and opportunities for public transport;*
- *local car ownership levels; and*
- *an overall need to reduce the use of high-emission vehicles*³

- 82.5 All of these factors were considered in developing the parking standards set out in the draft Plan, with a careful balance struck between strategic imperatives and accommodating a local approach. Appropriate weight has been given to different factors in different locations to reflect how the need and opportunities to move

¹ NLP/TR/003: Residential Car Parking, Transport for London, December 2017

² The Paris Climate Agreement and Climate Change Act (2008)

³ NLP/GD/03: DCLG: National Planning Policy Framework (NPPF), March 2012, paragraph 39

away from car use vary across London. The parking standards vary by Public Transport Access Level (PTAL) to reflect the accessibility and availability of public transport at a given development.

- 82.6 As shown by Figure 82.1 below, the standards allow for existing levels of car ownership to be broadly maintained outside areas that have the highest levels of public transport access. In areas where the proposed parking standards are lower than current car ownership levels, there are the most options for alternatives to car travel and the greatest access to services and amenities, presenting more opportunities for sustainable and active travel. This approach also applies in Opportunity Areas, where there are typically significant transport improvements proposed and greater opportunities for developments to be planned and designed from the outset to enable greater levels of walking, cycling and public transport use.
- 82.7 The parking standards also take into account the fact that London has some of the worst air quality in the UK and, as such, that there is a particular need to reduce the use of high-emission vehicles, through lower parking provision in new development as well as other measures that can be implemented through the Mayor's other powers, such as low emission zones.
- 82.8 Paragraph 39 of the 2012 NPPF should be read in conjunction with the following section from the Ministerial Statement of March 2015:
- 'Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network.'*⁴
- 82.9 The 2018 NPPF has a similar clause but goes further to explain that maximum parking standards are also appropriate *'for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework).'*⁵
- 82.10 Consistent with the 2018 NPPF, the need to optimise the density of development – given existing densities and the scale of London's housing need – has been given appropriate weight when deriving the proposed maximum parking standards, with parking standards reflecting PTALs. Existing population density in the majority of London is similar to or higher than the city centres of the largest urban areas elsewhere in the UK, reflecting the connectivity and capacity of London's public transport network. Maximum parking standards are required, as part of the wider package of Policies identified in the London Plan, if densities are to be optimised beyond existing levels.

⁴ Secretary of State for Communities and Local Government, [Planning Update: Written Statement HCWS488](#), 25 March 2015

⁵ MHCLG, NPPF 2018, Paragraph 106

- 82.11 Maximum residential parking standards are also required to manage London's road network, which suffers from some of the highest levels of congestion in the UK.⁶ Congestion, pollution and other externalities from car use do not have regard for borough boundaries and a strategic approach is needed to manage cumulative impacts. It is therefore necessary to include parking standards for areas that are less well connected and are of lower density, from which residents still drive to more congested areas.
- 82.12 The 2018 NPPF also sets out the need for the planning system to deliver a sufficient supply of homes, promote healthy and safe communities and make the most effective use of land, all of which maximum residential parking standards contribute to and are necessary for.

Achieving sustainable development

- 82.13 The draft Plan's approach to residential parking supports the delivery of economic, social and environmental benefits as London's population grows, helping to ensure that development in London is sustainable and contributes to the delivery of Good Growth. In particular, limiting the additional residential car parking, car ownership and car use associated with new development would result in:
- lower levels of congestion, enabling people and goods to move around the city more reliably;
 - better public health, achieved through increased physical activity levels, reducing health inequalities between different communities and reducing Londoners' risk of physical and mental health conditions;
 - better air quality and reduced carbon emissions, reducing the impact of new development on the environment, general health and well-being and health inequalities; and
 - lower levels of road danger and severance, reducing the number of people who are killed and seriously injured on London's roads and reducing social isolation through enabling more interaction between and within communities living near busy roads.
- 82.14 Parking standards set and applied consistently at a city-wide level will play a key role in ensuring future growth is sustainable and that the Mayor's Transport Strategy and draft London Plan's objective of 80 per cent of trips being made using active, efficient and sustainable modes is achieved. Further detail of the negative impacts of car use can be found in section A of the Residential Car Parking evidence paper.⁷

⁶ NLP/AD/58: Integrated Transport Planning, Understanding and Managing Congestion in London, November 2017, page 18

⁷ NLP/TR/003: Transport for London, Residential Car Parking, December 2017

In particular,

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

- 82.15 Table 10.3 sets out maximum parking standards for residential development according to the location of the site. These have been developed and are justified on the basis of the reasons set out above, with precise ratios based in part on car ownership levels and the availability of alternative transport in different areas of London⁸.
- 82.16 The overall approach reflected in the parking standards is supported by the strategic modelling carried out by TfL to support the draft London Plan and the MTS. This modelling, as set out by the Strategic Transport Modelling evidence paper⁹, demonstrates that the combination of the MTS and the draft London Plan can enable population and economic growth while securing sustainable transport outcomes. A key requirement of this approach is lower levels of car ownership as the city grows, which would rely significantly on the maximum parking standards set out in Table 10.3, alongside other measures. Without this approach, securing sustainable development in London would be critically undermined.
- 82.17 The standards aim to make a reasonable contribution to securing sustainable social, environmental and economic outcomes, given the opportunities to positively influence travel behaviour through the design and location of new development. While the parking standards represent lower provision than existing development, other measures (such as those set out in Table 10.1) will also be required to provide, and increase the attractiveness of, sustainable travel alternatives. This strikes an appropriate balance that prevents both sustainable outcomes being solely dependent on parking standards, and unacceptable impacts on the road network, public health and the environment. Further detail of this can be found in Section C of the Residential Car Parking evidence paper.¹⁰
- 82.18 The approach to the standards contained within Table 10.3 seeks to reduce car use while taking account of the alternatives to car ownership in different areas of London, including by:
- differentiating between inner and outer London, to reflect the differences in public transport opportunities, density, neighbourhood character, trip patterns and existing levels of car ownership and use and the potential for this to be reduced;
 - setting different standards for Metropolitan and Major town centres, to reflect the extensive range of jobs, retail and other services within walking distance, increasing the opportunities for living without a car

⁸ See Section B of the Residential Car Parking evidence paper for further detail on the potential for living without a car across London: NLP/TR/003: Residential Car Parking, Transport for London, December 2017.

⁹ NLP/TR/002: Transport for London, Strategic Transport Modelling Report, December 2017

¹⁰ NLP/TR/003: Transport for London, Residential Car Parking, December 2017

- setting different standards for Opportunity Areas, to reflect the potential they offer to coordinate new transport investment with development proposals to embed car-free or car-lite lifestyles from the outset; and
- using PTAL to reflect both the availability of public transport alternatives to car travel, and other characteristics which correlate with PTAL, such as density, character and access to jobs, retail and other services.

82.19 Table 10.3 balances all of this in the context of achieving sustainable development while significantly increasing housing supply and recognising the needs of residents in different areas.

82.20 Car-free¹¹ residential developments have become increasingly common in recent years and are now the expectation in boroughs such as Camden and Islington, who apply this standard borough-wide through their local plans. Section D of the Residential Car Parking evidence paper sets out how further car-free and car-lite development can be successfully implemented with the help of supporting measures.¹² These include improvements to walking, cycling and public transport infrastructure or services, such as through Local Implementation Plans and specific funding programmes such as Liveable Neighbourhoods. The use of Controlled Parking Zones, which tend to already be in place in well-connected locations, can support the implementation of the parking standards by enabling permit-free planning conditions and preventing overspill parking where necessary.

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?

82.21 The requirement that these specialist categories of residential development should be car-free allows the traffic impacts of these developments to be managed. They are typically high-density developments, meaning the provision of parking would have potentially significant negative impacts.

82.22 The reduced need to travel by car from these developments helps to justify the car-free approach. This type of development tends to be located close to public transport or co-located with destinations/workplaces where the need to travel is reduced (for example, to education or healthcare). Sui generis residential uses can include serviced apartments and short-term accommodation, where there is lower reliance on the car among occupiers, particularly during periods of temporary occupation, where alternative to private car ownership are more cost effective and practical, such as the use of public transport, taxis or private hire vehicles. Indeed, preventing car dependency for these types of development is supported through policy requirements elsewhere in the draft Plan; for example, Policies H17 B and

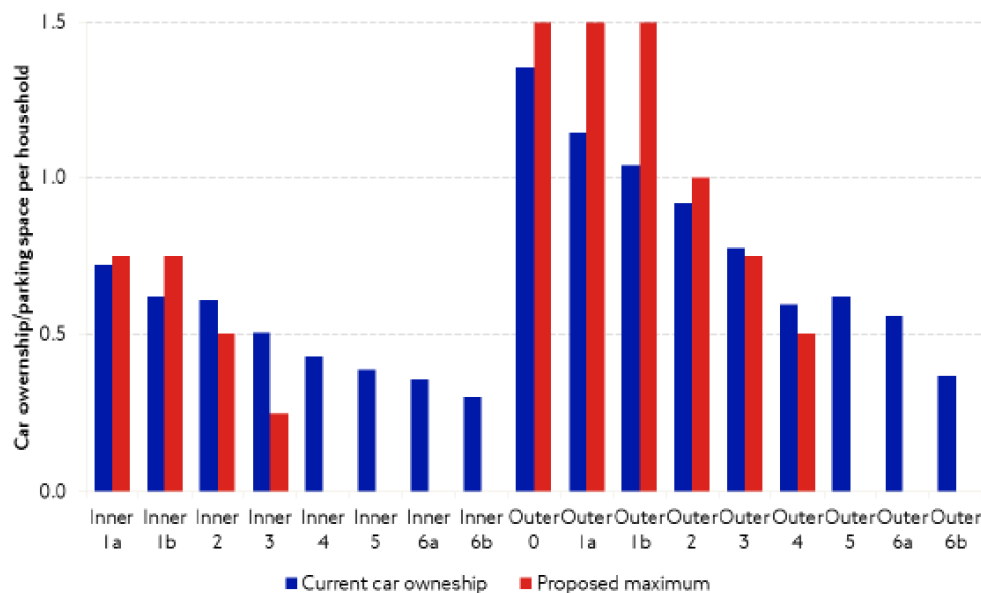
¹¹ Not applicable to disabled persons parking, as per minor suggested changes under Policy T6 B

¹² NLP/TR/003: Transport for London, Residential Car Parking, December 2017

H18 A2 encourage locating them in areas that are well served by walking, cycling and public transport, and have convenient, sustainable access to local facilities.

- 82.23 Evidence from previous planning permissions¹³ demonstrates that the vast majority of student accommodation schemes permitted have been car-free, suggesting that car-free lifestyles are a viable proposition in these circumstances and that the requirement of the draft Plan would be deliverable. In addition, clauses in leases for student accommodation and shared living have been used to restrict occupiers from bringing cars to the site and can be effective in helping to lessen parking pressures. Specialist residential development can also have the tendency to come forward on constrained sites, and under these conditions, the car-free requirement will contribute to ensuring that the best use is made of land (especially in locations that are well served by public transport).

Figure 82.1 – Comparison of current car ownership levels to maximum parking standard by PTAL and inner/outer London



Source: TfL City Planning analysis of the London Travel Demand Survey, Table 10.3 of the draft London Plan

Note: While a small amount of London's population is located in inner London PTAL 0, there was an insufficient sample size to find current car ownership and mode share, and so has been excluded from the analysis

¹³ Based on permissions including Student Accommodation from London Development Database.