

Consultation response to Minor Alterations to the London Plan – parking standards

<http://www.london.gov.uk/priorities/planning/london-plan/minor-alterations-to-the-london-plan-2015>

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A) Proposed amendments from the Mayor of London

The consultation proposes a number of amendments to address the following commitment in the final Further Alterations to the London Plan (FALP):

Paragraph 0.16H of the London Plan now states:

“...the Mayor will bring forward additional alterations to the London Plan in early 2015 to reflect Government housing standards. He will also give active consideration to addressing changes to national policy on car parking should Government bring these forward. The Mayor recognises the flexible approach in the National Planning Policy Framework on parking standards, and the abolition of maximum parking standards in national policy. National planning guidance published in 2014 also recommends that planning policies should consider how parking provision can be enhanced to encourage the vitality of town centres. Whilst the Mayor considers that there are sound reasons for retaining residential parking standards in core and inner London, he recognises the opportunity to adopt a more flexible approach in parts of outer London, especially where public transport accessibility levels are lower. He therefore intends to bring forward an early review of parking standards in Outer London in advance of the general review of the Plan. In doing so he will give active consideration to any changes to national policy on car parking should Government bring these forward.”

The proposed Minor Alterations to the London Plan (MALP) in policy 6.13, paragraph E(e) serve to weaken current parking standards in areas of low public transport accessibility. The following paragraph is added:

"e outer London boroughs should promote more generous standards for housing development in areas with low public transport accessibility (generally PTALs 0 -1) and take into account current and projected pressures for on-street parking and their bearing on all road users, as well as the criteria set out in NPPF (Para 39)."

And further details of the measures are given in new paragraphs 6.42 I, j and k. In particular, paragraph 6.42j adds a further potential watering down of parking standards to cover PTAL level 2:

"6.42j In outer London a more flexible approach for applications may also be acceptable in some limited parts of areas within PTAL 2, in locations where the orientation or levels of public transport mean that a development is particularly dependent on car travel. Further advice is provided in the draft Housing SPG and forthcoming TfL guidance on parking design."

B) Our objection in summary

- We believe these changes are unjustified, go against evidence of how sustainable development can be achieved in London, and would serve to undermine positive changes in car ownership and driving trends, reducing health and wellbeing and increasing traffic and congestion in the long term.
- We also believe the consequent increase in air pollution, due to increased car travel, is not lawful. These measures do not comply with the clear obligation on the GLA to reduce air pollution in all areas of London to within legal limits as soon as possible. We fully support the evidence and objections lodged by Clean Air in London and Friends of the Earth London to this consultation on this topic.
- There is a wealth of evidence to show that relaxing parking standards would be a step backwards in terms of traffic restraint, would be unlikely to help businesses, and would be a very risky change to make when faced with a growing population and the need for increased density of development in all areas of London.
- **Therefore, we call for all the policy alterations being put forward in this consultation to be rejected and for no further changes to be made to parking standards in the London Plan.**

C) Evidence and discussion

There is a strong case for London Plan changes to tighten parking standards, not weaken successful policies.

1. The changes would undermine recent trends

Tables 1 and 2, showing Census data, confirm that London's car dependency has reduced since 2001. Section 4.7 of the Integrated Impact Assessment (IIA) gives recent data on car ownership, comparing outer London with inner areas, but the real comparison that should be made is between outer London now and in the past. The census data below shows that, though the trend is less pronounced than in central areas, outer London has seen an increase in households with no car and a reduction in the number of cars per household over this decade.

Table 1: Household Car Availability - percentage of households with no car - London¹

	Greater London - all	Central London	Rest of Inner London	Outer London
2001	37.5	54.4	49.2	30.6

¹ 2011 Census data comparison for types of London areas via NOMIS <https://www.nomisweb.co.uk/census/2011>

2011	41.6	60.5	55.2	33.3
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Table 2: Household Car Availability - average cars per household - London²

	Greater London - all	Central London	Rest of Inner London	Outer London
2001	0.87	0.57	0.64	1.00
2011	0.82	0.50	0.55	0.97

These are positive trends that provide no pressure for increased car parking in newer developments, even in outer London. If any policy changes are to be made, they should be to reduce car parking provision further. This would help build upon these changes and allow more space to be used for accommodating people rather than vehicles.

Table 3 demonstrates that the current standards already exceed current car ownership rates across London. **To achieve sustainable development, parking standards for new developments should aim to do better than the present situation.**

Table 3: PTAL ratings vs car ownership, using Census 2011 data for London's 4,835 Lower Super Output Areas (LSOAs)^{3,4}

LSOA PTAL ratings	Average proportion of households with a car	Average cars per household	Current LP parking standards (central areas)	Current LP parking standards (urban areas)	Current LP parking standards (suburban areas)
PTAL 0 to 1	0.8	1.19	Up to 1.5 spaces per unit	Up to 1.5 spaces per unit	Up to 2 spaces per unit
PTAL 2 to 4	0.6	0.81	Up to 1 space per unit	Up to 1.5 spaces per unit	Up to 1.5 spaces per unit
PTAL 5 to 6	0.4	0.46	Up to 1 space per unit	Up to 1 space per unit	Up to 1 space per unit

2. The changes go against recent evidence of the effectiveness of parking policies

A Government-commissioned study looked at the influence of parking policies on traffic growth and economics in 2008. This was carried out by Atkins for the Department for Transport,⁵ and reviewed the evidence for the effects of different policies. It found:

- "i) Restricting parking numbers leads to a reduction in demand*
 - ii) Modelling has shown that parking is a more effective demand management tool than public transport fare reductions*
- [...]

² 2011 Census data comparison for types of London areas via NOMIS <https://www.nomisweb.co.uk/census/2011>

³ LSOA PTAL ratings from Freedom of Information release by Transport for London, 2012: https://www.whatdotheyknow.com/request/ptal_data_for_all_isoas_in_londo

⁴ 2011 Census data by LSOA via NOMIS <https://www.nomisweb.co.uk/census/2011>

⁵ Research into the Use and Effectiveness of Maximum Parking Standards, Atkins for the Department for Transport, June 2008 <http://webarchive.nationalarchives.gov.uk/20111025111955/http://www.dft.gov.uk/publications/maximum-parking-standards>

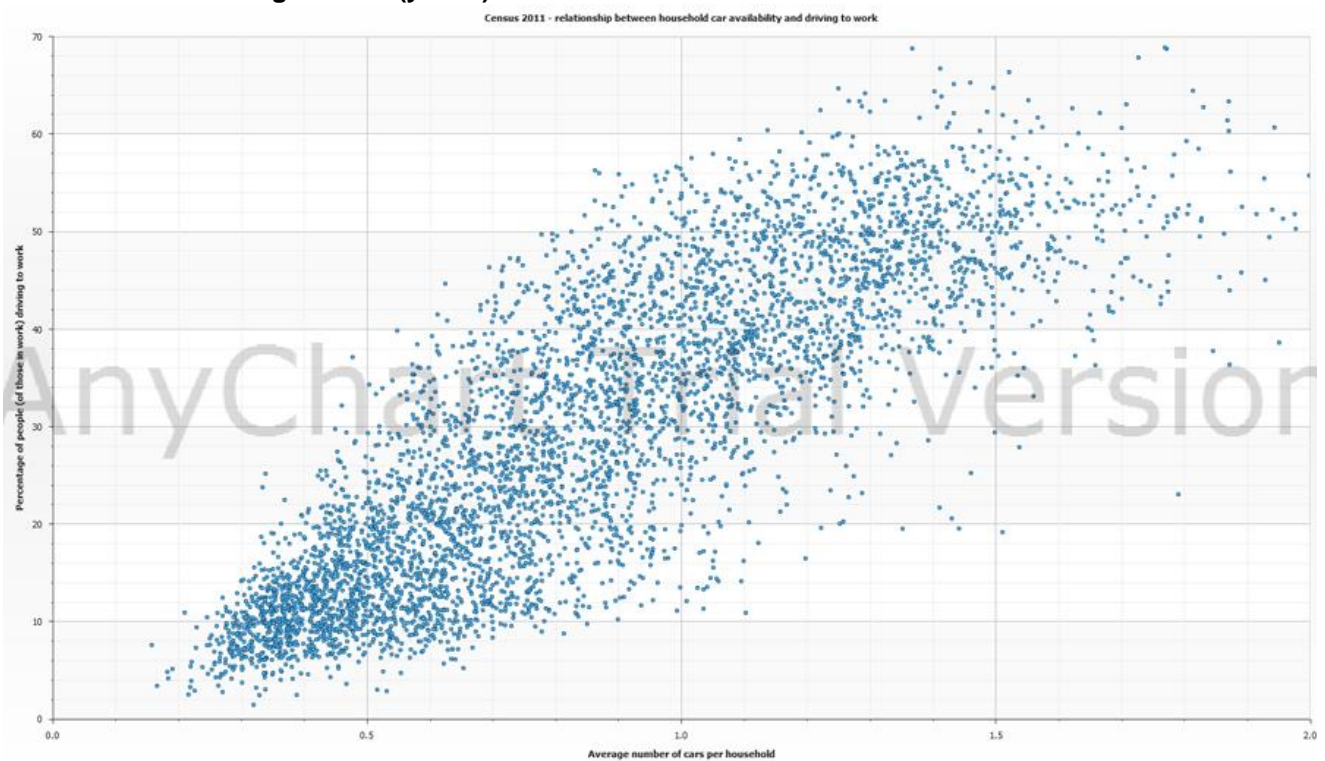
xiv) There is no evidence that relaxing parking standards improves economic performance"

In contrast, as section 4.9 of the IIA notes, evidence provided by Berkeley Group that appears to suggest a low risk of encouraging new traffic by relaxing parking standards is highly questionable and based on a very limited sample.⁶

Our written evidence to the recent FALP public inquiry reanalysed the Berkeley Group data from 2011 and found that, in contrast to their claims, even within their own data links were apparent between car parking spaces/home vs AM car trip rates, car ownership vs AM car trip rates and car parking spaces per home and car ownership.⁷

We also analysed the much larger dataset of the 2011 Census and showed a very strong correlation within London between car ownership and commuting by car, as shown in Figure 1 below.

Figure 1: 2011 Census data for each Lower Super Output Area in London: number of cars (x-axis) vs % commuters driving to work (y-axis)



3. The case for consistency and certainty in planning policies

There is a strong case that developers and their investors would benefit more from certainty and clear standards that are applied to everyone, than from a policy of 'flexibility' which in reality reduces the ability of these businesses to plan ahead with certainty when, for example, purchasing land.

⁶ MALP Parking Standards Integrated Impact Assessment, Greater London Authority, April 2015 <http://www.london.gov.uk/sites/default/files/MALP%20parking%20standards%20-%20IIA%20April%202015web%20REVISEDJUNE2015.pdf>

⁷ Written statement from Campaign for Better Transport for the Further Alterations to the London Plan Examination in Public, August 2014 http://bettertransport.org.uk/sites/default/files/research-files/WR_Campaign_for_Better_Transport_305_Aug2014.pdf

Inconsistent interpretations of any new flexibility could lead to planning decisions and conditions that vary within and between boroughs, with the result of varying levels of density in new housing and a reduced ability to monitor and predict the effect of new housing on other services, including transport.

Certainty in planning standards should also benefit homebuyers, and with a clear and gradual reduction in the number of parking spaces available, should also provide a strong 'nudge' towards behaviour change in purchasing and using cars.

For transport planning purposes, too, a consistent policy of reducing parking levels in new developments will help ensure that planning for public transport services is accurate and a good use of public money is made in investment decisions. This is particularly important in areas with low PTAL ratings, where investment is most needed, and where increasing density of housing would mean new services were more viable.

4. Reducing air pollution as a legal imperative

We are very concerned that the policy would lead to higher levels of air pollution than if the London Plan was left unchanged.

Table 4.1 of the IIA outlines an expected reduction in active travel and public transport use and an expected increase in car travel as a result of the policy. These are small but significant (-0.3%, -0.3% and +0.8%, respectively) and we do not accept the dismissal of these as 'marginal changes' in the assessment. We assume these changes are averaged over the whole of London, and therefore that in certain areas the effect would be more significant.

The position of the UK in terms of its non-compliance with EU air quality legislation⁸ is becoming increasingly clear, casting doubt on the legality of any policies that increase road traffic and relevant emissions within polluted urban areas. Recent developments include:

- A 2013 Supreme Court ruling that the UK is failing in its legal duty to protect people from the effects of air pollution⁹
- A 2014 European Court of Justice judgment that the government must act to bring pollution within legal limits 'as soon as possible'¹⁰
- The ruling by the UK Supreme Court in April 2015 that new national air quality plans must be drawn up to achieve this.¹¹

Many of the worst areas for air pollution in the UK, including the most polluted roads, are in London, and the city's Air Quality Management Areas cover main roads right into outer London and onto the M25 – see these illustrated on the map below. Any new traffic generated by the changes in parking policy proposed will add to this pollution and contravene the requirement for air pollution to be reduced as soon as possible.

This legal problem cannot be avoided through mitigation, for example by the 'implementation of wider London Plan policies'. Any such wider policies should, in any case, also be pursued in addition to strong parking policies in order to achieve the limit values as soon as possible.

⁸ Directive 2008/50/EC http://ec.europa.eu/environment/air/quality/legislation/existing_leg.htm

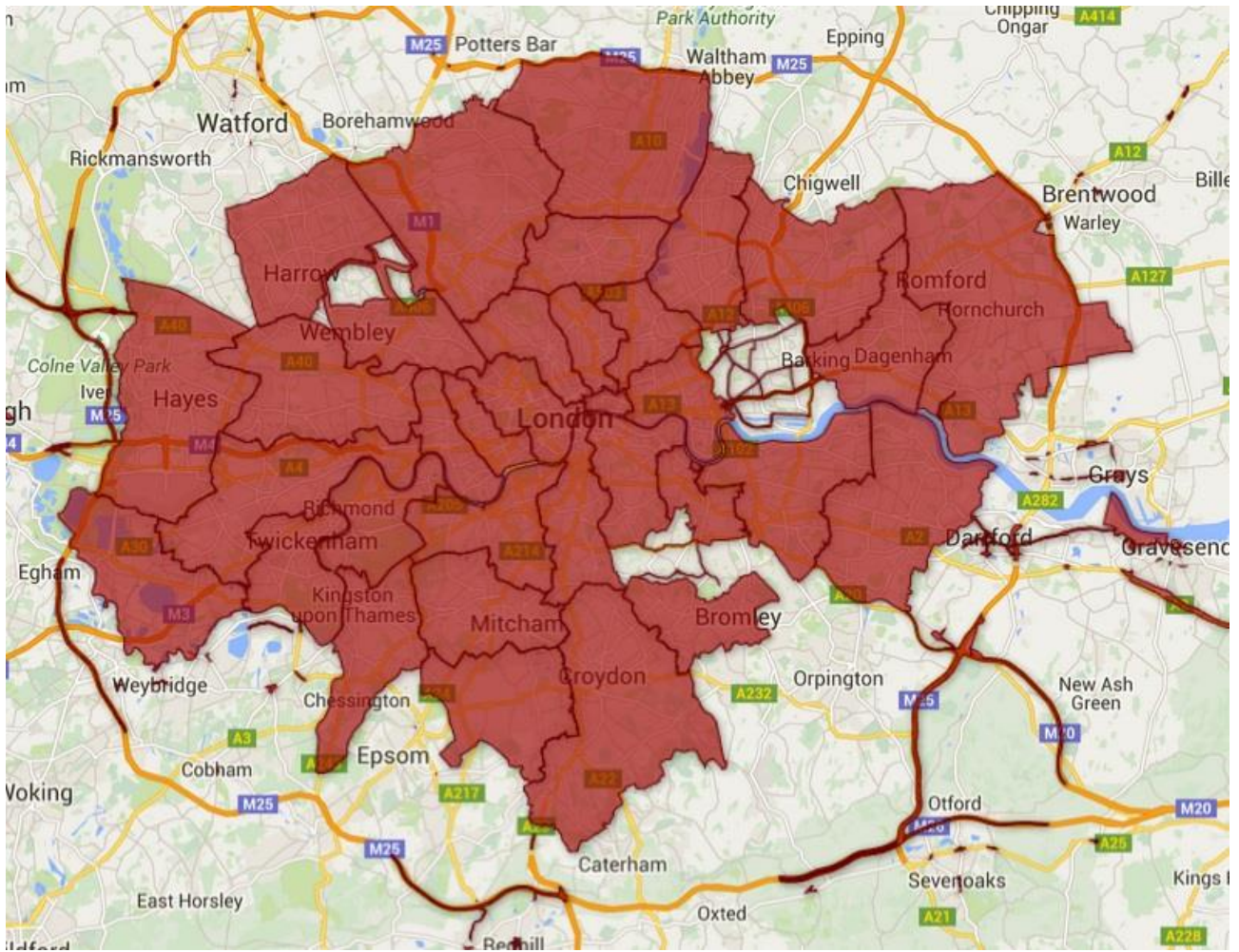
⁹ News about Supreme Court decision with links to summary and full judgment <http://www.healthyair.org.uk/clientearth-triumph-in-the-supreme-court/>

¹⁰ Court of Justice of the European Union, Judgment in Case C-404/13 The Queen, on the application of ClientEarth v The Secretary of State for the Environment, Food and Rural Affairs, November 2014 <http://curia.europa.eu/jcms/upload/docs/application/pdf/2014-11/cp140153en.pdf>

¹¹ R (on the application of ClientEarth) v Secretary of State for the Environment, Food and Rural Affairs, UKSC 25 Supreme Court judgement, press summary, April 2015 https://www.supremecourt.uk/decided-cases/docs/UKSC_2012_0179_PressSummary.pdf

We therefore fully support the submissions by Clean Air in London and Friends of the Earth London on these matters, and urge that the policy changes are rejected as incompatible with complying with the law on air pollution.

Figure 2: 2013 map of Air Quality Management Areas in London



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Sian Berry
Campaign for Better Transport

Campaign for Better Transport’s vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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