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Written statement from Campaign for Better Transport for the Further Alterations to the London Plan Examination in Public

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This statement provides further evidence in response to question 8(e) in the final matters document. Our comments on wider issues are in our original submission.¹

e) Are the standards for car parking spaces justified, supported by evidence and appropriate for the whole of London?

A) Proposed amendments from the Mayor of London

A number of amendments in *Draft Further Alterations to the London Plan*,² and *Schedule of Suggested Changes*,³ would weaken parking standards and allow higher numbers of residential parking spaces.

In Policy 2.8, document FA/CD/01 adds text commenting on 'greater dependence on the private car':

"h ...car parking policy **and guidance which reflects greater dependence on the private car**;..."

In Policy 6.13, document FA/CD/01 reduced the weight applied to maximum car parking standards:

"C The maximum standards set out in Table 6.2 in the Parking Addendum to this chapter should be **the basis for considering** ~~applied to~~ planning applications."

In Table 6.2, document FA/CD/01 increases parking standards, with a small change for clarification made in document FA/CD/06 (change 6.21):

Maximum residential parking standards			
Number of beds	4 or more	3	1-2
	Up to 2 1.5 per unit	Up to 1.5 1 per unit	Less than 0.1 Less than 1 per unit

¹ Campaign for Better Transport representation:

<http://www.london.gov.uk/sites/default/files/305CampaignforBetterTransportResponse.pdf>

² FA/CD/01 <http://www.london.gov.uk/sites/default/files/FALP.pdf>

³ FA/CD/06

<http://www.london.gov.uk/sites/default/files/FALP%20SUGGESTED%20CHANGES%207%20July%202014.pdf>

Document FA/CD/06 proposes changes to supporting text in the Transport chapter to weaken the policy further (change 6.15):

~~"In Inner London/other locations which benefit from good access to public transport, t~~The Mayor ~~strongly continues to encourages~~ a restraint based approach to parking across all land uses in Inner London and other locations which benefit from good access to public transport."

Document FA/CD/06 removes text added by document FA/CD/01 in the notes to table 6.2 (change 6.22):

"All developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit, ~~and towards zero/car-free in the areas of highest accessibility.~~"

B) Proposed changes to the draft from Campaign for Better Transport

- i) Remove the additional text in Policy 2.8. Evidence below shows that there is no 'greater dependence on the private car', either in Inner or Outer London, than in previous years.
- ii) Retain the previous wording of policy 6.13, i.e. '*should be applied to*' rather than '*should be the basis for considering*'.
- iii) Abandon the increase in residential parking standards in table 6.2 (change 6.21) at least, and preferably tightening them to require lower parking levels.
- iv) Change 6.15 should be withdrawn.
- v) Change 6.22 should be withdrawn.

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.

Table 1: Household Car Availability - percentage of households with no car - London⁴

	Greater London - all	Central London	Rest of Inner London	Outer London
2001	37.5	54.4	49.2	30.6
2011	41.6	60.5	55.2	33.3

Table 2: Household Car Availability - average cars per household - London⁵

	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. 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.

⁴ 2011 Census data comparison for types of London areas via NOMIS <https://www.nomisweb.co.uk/census/2011>

⁵ 2011 Census data comparison for types of London areas via NOMIS <https://www.nomisweb.co.uk/census/2011>

Table 3 demonstrates that proposed new standards exceed current car ownership rates across London. Standards for new developments should aim to do better than the present situation not allow things to get worse.

Table 3: PTAL ratings vs car ownership, using Census 2011 data for London's 4,835 Lower Super Output Areas (LSOAs)^{6,7}

LSOA PTAL ratings	Average proportion of households with a car	Average cars per household
PTAL 0 to 1	0.8	1.19
PTAL 2 to 4	0.6	0.81
PTAL 5 to 6	0.4	0.46

We also question the use of PTAL ratings alone in the matrix of parking standards by PTAL level in the parking addendum. In the best planned suburban centres (particularly areas being improved as 'Mini Hollands'), services might be easily reached on foot or by bike, for example. Therefore, a combination of PTAL and ATOS (access to opportunities and services)⁸ ratings may be a better way to assess car dependency and define appropriate local parking standards.

2. The changes go against recent evidence of the importance 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,⁹ 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*
- [...]*
- xiv) There is no evidence that relaxing parking standards improves economic performance"*

The FALP proposals appear to be based on much less sound evidence, as the next section will demonstrate.

3. The changes appear to depend on unreliable evidence from developers

In relaxing parking standards, and particularly in proposing change 6.22, the Mayor appears to be following suggestions from developers, including evidence provided by Berkeley Group that appears to suggest a low risk of encouraging new traffic by relaxing parking standards.

Berkeley's initial submission to this examination refers to evidence that has:

"demonstrated that there is no link between car ownership and car use and between the desire to own a car and PTAL"¹⁰

⁶ 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

⁷ 2011 Census data by LSOA via NOMIS <https://www.nomisweb.co.uk/census/2011>

⁸ Travel in London report 4, Chapter 8. Transport for London 2011 <http://www.tfl.gov.uk/cdn/static/cms/documents/travel-in-london-report-4.pdf>

⁹ 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>

¹⁰ Berkeley Group (participant 58) initial comments on FALP, February 2014 <http://www.london.gov.uk/sites/default/files/058BerkeleyGroupResponse1.pdf>

This refers to a study Berkeley Group itself commissioned to look at its recent developments in London.¹¹

For this submission, I have looked more closely at the results presented by Berkeley in this report (there is apparently a further 2014 study, but no copy could be found online).¹² The 2011 study looked at 15 new housing developments and examined, with surveys, the car ownership and commuting habits of its residents.

Using the metric '**Maximum Trip Rate/Car Ownership ratio**' (where 'maximum trip rate' reflects either AM or PM peak hour trips by car per resident, as reported in a one-off survey) the study calculates the metric for 13 developments and observes that the ratio varies in value. It then concludes that:

"in the majority of recorded survey data there is no apparent relationship between levels of car ownership and levels of recorded car use."

i) Reanalysis of Berkeley Group study data

The 12 developments with comparable data given on the number of homes, car parking provision, ownership and surveyed trip rates are shown in Table 4.

Table 4:

Development	PTAL	Homes	Car parking spaces	Car parking spaces/home	Car ownership rate	AM car trip rate
St George Wharf	6	927	793	0.86	0.54	0.017
Imperial Wharf	3	1263	1157	0.92	0.55	0.070
Kew Riverside Park	1	192	202	1.05	0.58	0.260
Riverside West	3	517	578	1.12	0.51	0.028
Beaux Arts Holloway	3	189	189	1.00	1.00	0.063
Kennington Park Square	3	214	64	0.30	0.19	0.005
Wingate Square	6	170	70	0.41	0.27	0.094
New Providence Wharf	1	559	303	0.54	0.54	0.043
City Walk	5	110	110	1.00	1.00	0.009
Bow Quarter	2	714	753	1.05	1.03	0.041
Kempton Court	6	80	80	1.00	1.00	0.063
The Hamptons	1	645	903	1.40	1.50	0.284

Despite the report's conclusions, within this data there are signs of relationships between factors. For example, calculating a simple Correlation Coefficient for relevant pairs gives the numbers shown in Table 5.

¹¹ Does car ownership increase car use? WSP for Berkeley Group, 2011
<http://www.berkeleygroup.co.uk/media/pdf/e/t/car-parking-report.pdf>

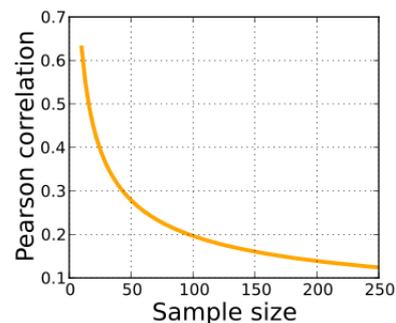
¹² People use their car for leisure - not commuting. Berkeley Group press release, January 2014
<http://www.berkeleygroup.co.uk/index.cfm?articleID=5343>

Table 5:

Comparison factors	Correlation coefficient
Car parking spaces/home vs AM car trip rate	0.481
Car ownership vs AM car trip rate	0.403
PTAL vs AM car trip rate	-0.497
Spaces/home vs car ownership	0.806

For small sample sizes, statistical significance has a stiff test – see Figure 1, which shows the approximate value needed for a link to be established with a p-value of <0.05.¹³

However, all these factors appear to be at least somewhat related in the results of the Berkeley Group study, and the correlation between car parking and car ownership meets even the highest test of significance.

Figure 1:

ii) Relationships found in Census data

This section conducts a similar search for relationships between car ownership and car travel in the much larger dataset of the 2011 Census. Table 6 shows a comparison for Greater London between two factors: travel to work method (for household members in work) and household car availability.

Table 6:

Method of travel to work (2001 specification)	All categories: Car or van availability	No cars or vans in household	1 car or van in household	2 or more cars or vans in household
All categories of travel method	100.0%	100.0%	100.0%	100.0%
Work mainly at or from home	9.6%	7.8%	9.8%	11.1%
Train, underground, metro, light rail, tram, bus, minibus or coach	48.3%	67.3%	47.9%	28.9%
Driving a car or van	26.4%	5.1%	26.7%	48.5%
All other methods of travel	15.7%	19.8%	15.7%	11.5%

This shows a clear link between these factors at a population level. To study different areas, I also analysed 2011 Census data for London's 4,835 Lower Super-Output Areas (LSOAs).

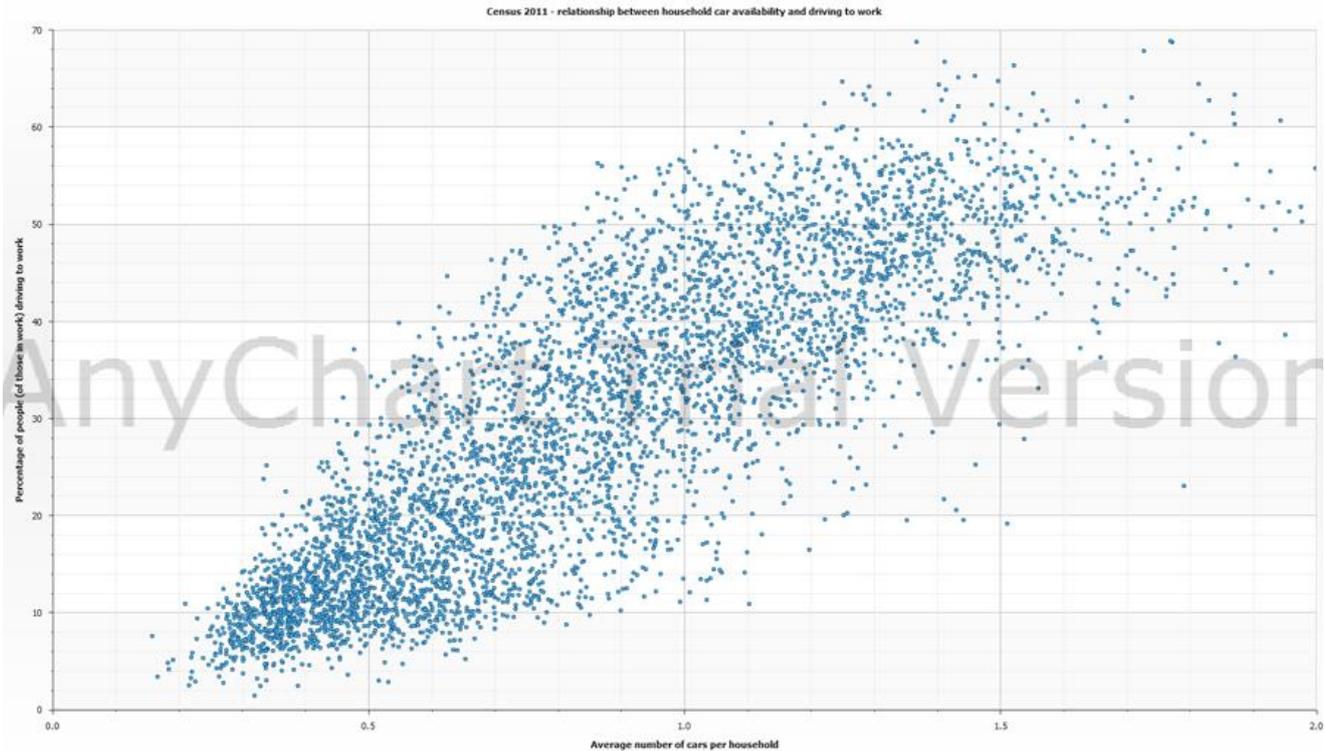
Correlation Coefficients for a range of factors are shown in Table 7 and a plot showing the distribution of the final two factors (car ownership vs driving to work) across all LSOAs is in Figure 2. With the Census dataset, all the correlations below will reach high levels of statistical significance.

¹³ Image: Correlation significance by Skbkcka. Licensed under Creative Commons Attribution 3.0 via Wikimedia Commons - commons.wikimedia.org/wiki/File:Correlation_significance.svg#mediaviewer/File:Correlation_significance.svg

Table 7:

Comparison factors from 2011 Census data	Correlation coefficient
Average PTAL of the LSOA vs percentage of households with no car or van available	0.642
Average PTAL of the LSOA vs average number of cars per household	-0.596
Average number of cars per household vs percentage driving to work (see Figure 2)	0.840

Figure 2: 2011 LSOA data: number of cars (x-axis) vs % commuters driving to work (y-axis)



4. Conclusions

A second look at the Berkeley study results has shown that, even with this very small sample size, there are in fact strong signs of relationships between car parking provision, car ownership and travel by car.

The much larger dataset of the 2011 Census also shows that there are clear and strong relationships across London between PTAL ratings, car ownership and levels of commuting by car.

These much more reliable conclusions, combined with the Atkins evidence, 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.

D) References and sources

Two documents cited by this submission are being deposited for inclusion in the Examination Library:

- Research into the Use and Effectiveness of Maximum Parking Standards. Atkins for Department for Transport, June 2008.
<http://webarchive.nationalarchives.gov.uk/20111025111955/http://www.dft.gov.uk/publications/maximum-parking-standards>
- Does car ownership increase car use? WSP for Berkeley Group, 2011.
<http://www.berkeleygroup.co.uk/media/pdf/e/t/car-parking-report.pdf>

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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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