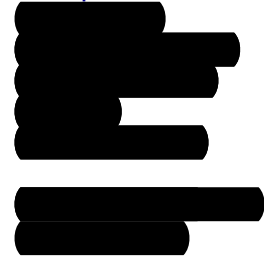




Transport for London



Julia Johnson | Planning Policy Manager
London Borough of Hillingdon
localplan@hillington.gov.uk

2/5/2019

Dear Ms Johnson,

Thank you for consulting TfL on the proposed Main Modifications to LBH Local Plan Part 2.

We are very disappointed that the parking policies and standards set out in LBH's Local Plan Part 2 remain as proposed. Unfortunately, this will have many adverse implications, not just for your own residents and visitors but those in other boroughs and for London as a whole, and it goes against the vision for 'good growth' established in the London Plan.

This includes undermining the delivery of housing and employment growth targets, as high levels of parking will constrain the amount of development in the borough given the limited land available, as well as its quality and that of the street environment and surrounding public realm. Crucially, it will also add to congestion on the road network in and around Hillingdon, with associated negative economic, environmental and health impacts.

We do recognise that despite improvements being made to public transport and active travel in the borough, including the delivery of the Elizabeth line, car travel will continue to play more of a role here than in some other boroughs, particularly in some parts of the borough that are less well connected. The London Plan recognises this. In Hillingdon, however, the less connected places are identified for little if any growth. Conversely, significant growth is forecast in the better connected areas (see Figure 1 in Appendix B), particularly around Uxbridge and Hayes. High parking standards are especially concerning in these and the other PTAL 4 -6 locations (see Appendix A) that are best served by public transport and are generally in close proximity to local services and facilities. It is here, particularly, where both the direct and opportunity costs will be greatest.

It is the poorer families in our city who are disproportionately impacted by the congestion and emissions resulting from high levels of parking - with their bus journeys slowed, air pollution increased and severance worsened. Congestion, emissions and public health are challenges facing our city that span administrative boundaries and all boroughs must make an appropriate contribution to addressing them. This approach is increasingly being recognised by other outer London boroughs, including the London Borough of Merton which has recently published a draft Local Plan that follows the approach set out for parking in the draft London Plan. Other boroughs such as Hounslow, Bexley and Croydon also take a more mixed approach to parking, recognising that well connected parts of outer London can have successful car free and car-lite development.

We are aware that LBH have submitted the 'Parking Standards Justification: Assessment of Available Data' report to the London Plan EiP Library, which argues for more generous provision in the borough and states that input from TfL was considered. However, as summarised in our updated written statement on the Local Plan which we sent on 26 July 2018, we highlighted serious flaws in the methodology and errors in the conclusions that were not addressed in the final report. We therefore set out reasons why we do not believe this report is sound evidence in a rebuttal, which we attached as an appendix to our written statement for Matter 81 in the London Plan EiP. We have attached this report for reference in Appendix B below.

The Mayor's Transport Strategy (MTS) and draft London Plan set a clear strategic policy direction which prioritises mode shift from car travel. This is to enable London to grow sustainably - without changes to the way some Londoners travel, the city will simply not be able to provide sufficient housing to meet the objectively assessed need, and we will not be able to meet the challenges set out in the London Plan in terms of congestion, health, environment, or ensure a liveable, inclusive city.

We therefore remain firm in our objection to the parking standards set out in Policy DMT 5, Policy DMT 6 and in Table 1b in Appendix C of Hillingdon's Local Plan Part 2, which will undermine the ability to manage demand on the road network and make the best use of land – a scarce resource in our growing city.

Yours sincerely,

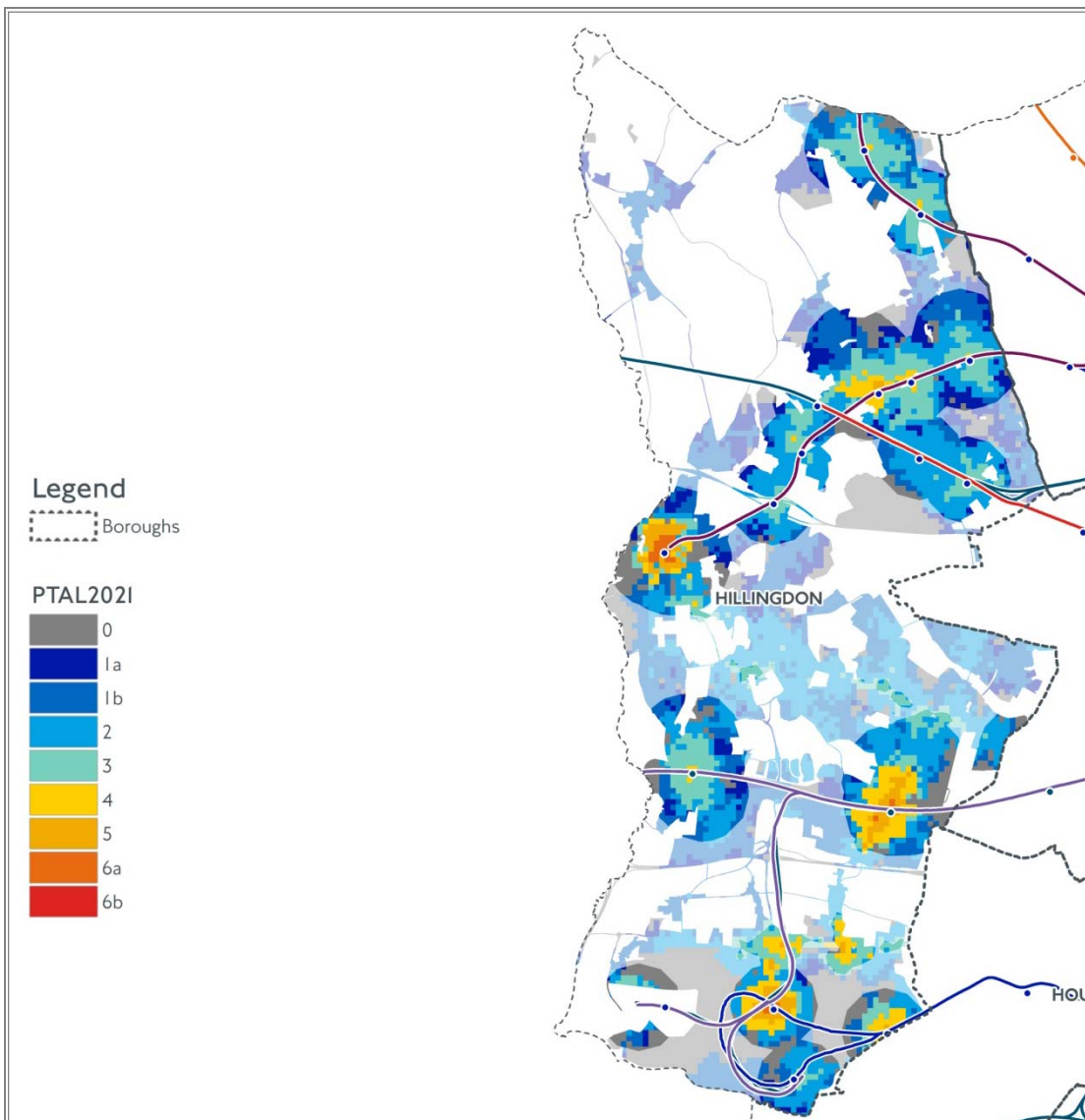
Josephine Vos

Josephine Vos | Manager

London Plan and Planning Obligations team | City Planning

Email: [REDACTED]

Appendix A: 2021 PTAL map of Hillingdon



Appendix B - Rebuttal to London Borough of Hillingdon's Parking Standards justification: Assessment of Available Data

1. INTRODUCTION

The report 'London Borough of Hillingdon's Parking Standards Justification: Assessment of Available Data' (NLP/AD/25) seeks to justify parking standards that are higher than the adopted London Plan maximum standards, and presumably has been submitted to inform the discussion on the draft London Plan parking standards. As part of engagement on the local plan process, TfL provided comprehensive comments to LB Hillingdon highlighting a number of concerns with the methodology used, but the vast majority of these comments have not been reflected in the final report. Most fundamentally, **the analysis does not attempt to examine journey patterns that are representative of Hillingdon residents, and does not consider the fact that growth is expected to be focused in well connected locations¹**. We therefore argue that this document is not sound evidence and that the claim on page six stating 'this presentation takes into consideration feedback from TfL' is potentially misleading.

2. CRITIQUE OF FINDINGS AND METHODOLOGY

The report attempts to justify higher parking provision on the basis of 'unique challenges' within the borough, in particular:

Claim 1: A high proportion of residents (86%) live in areas of Public Transport Access Levels (PTAL) 2 or below and the impact of the Elizabeth line is limited (pages 8-11)

While this is an accurate statement in isolation, it is **not relevant to residential parking standards, which apply only to new development, as growth will be focused in well connected locations**. In Hillingdon's case, 71 per cent of large site SHLAA capacity between 2020-29 is in areas of PTAL 3-6.²

Furthermore, it is true that the Elizabeth line will have limited effect on PTAL in Hillingdon, but it does increase the level at Hayes, where significant growth is planned. More importantly, the Elizabeth line will provide wider connectivity enhancements, with quicker journey times to key destinations and interchanges such as Tottenham Court Road, Stratford and Canary Wharf (which, as noted, is not fully captured by PTAL alone).

Claim 2: Most trips are quicker by car and few can be switched to other modes (pages 12-17)

LB Hillingdon's definition of trips is highly unrepresentative: 9 of the 13 locations chosen represent³ fewer trips made by Hillingdon residents than just 2 locations - Uxbridge and Hayes, where most of the growth is focused. This is likely because the

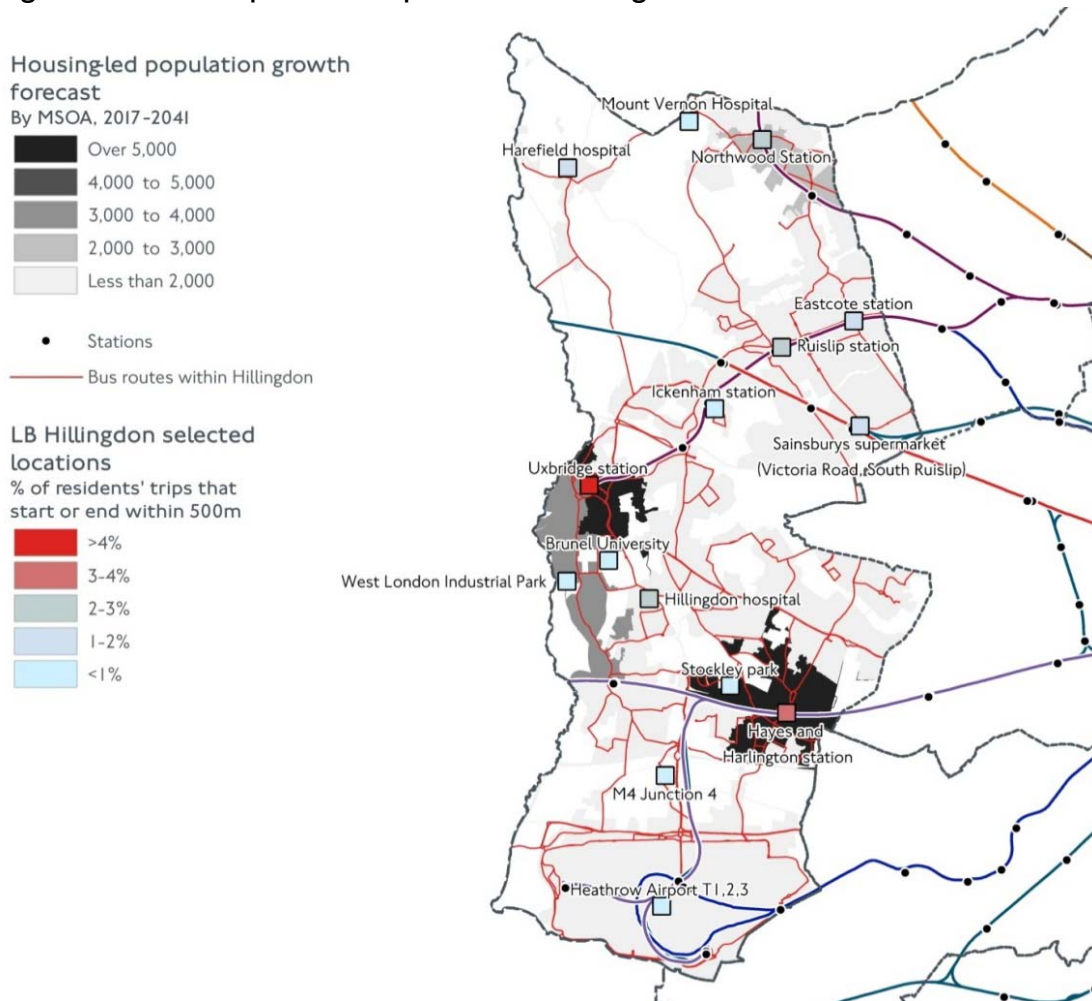
¹ GLA/TfL analysis of SHLAA sites

² GLA/TfL analysis of SHLAA sites

³ Our analysis of the London Travel Demand Survey shows that 8.5 per cent of Hillingdon residents' trips start or end within 500m any of Stockley park, the M4 Junction 4, Mount Vernon Hospital, Brunel University, West London Industrial Park, Ickenham station, Harefield hospital, Eastcote station or Northwood Station. In contrast, 10.0 per cent started or ended within 500m of either Uxbridge or Hayes and Harlington stations.

destinations include trips between locations such as hospitals, an industrial park and the M4 junction 4,⁴ which very few people will travel directly between (if travelling to these locations at all). Figure 1 below shows that most of the destinations analysed on page 12 of the report are within close proximity to Hillingdon's growth areas around Uxbridge and Hayes and could be reasonably easily reached by public transport or active modes.

Figure 1 – Growth, public transport and LB Hillingdon's selected destinations



Source: GLA housing-led population forecast and London Travel Demand Survey

The assessment of journey time does not appear to capture delays due to congestion or the time it takes to park and walk to the final destination, both of which are highly likely to get increasingly worse over time if high levels of car-dependent development are delivered.

Further journey time comparisons involving access to five 'key' destinations are then made (three of which are represented above, plus Heathrow and a particular Sainsburys store) for example, claiming 97 per cent of Hillingdon's population are able to travel to Uxbridge town centre within 30 minutes by car but only 40 per cent can reach it within 20 minutes by public transport (it is not clear why different journey

⁴ Only 0.1% of trips made by Hillingdon Residents start or end within 500m of the M4 Junction 4 – London Travel Demand Survey

durations are used here). Again, this is not relevant to new residential developments, which will not be distributed in the same way as the existing population. Indeed, much of Hillingdon's growth will take place in and around Uxbridge and Hayes town centre.

The same flawed origin and destination methodology was used to analyse cycling potential (for example the 'M4 Junction 4' is unlikely to be an appealing destination for people who are cycling) which 'eliminates' 71 per cent of the unrepresentative sample of car journeys. The analysis also takes trip distances from commute trips which, aside from being a small minority of trips,⁵ tend to be made over longer distances than journeys made for other purposes, and therefore understate how 'cyclable' the majority of trips are.

Our analysis, updated in 2016⁶ (which was not reflected in the report), looks at journey distances, encumbrance, age and other factors, and suggests **58 per cent of Hillingdon residents' car trips could be cycled, and a further 6 per cent that are not cyclable could still be made by public transport within a similar journey time to the car**. This is for all Hillingdon residents, and the potential for sustainable mode use will be significantly higher in the better connected areas where future growth is concentrated. Where growth occurs in less well connected areas, the proposed London Plan standards will enable greater levels of car ownership.

Claim 3: Points of interests are not accessible enough by public transport (pages 18-21)

The analysis appears to selectively group PTAL 3 with lower levels of PTAL, and the same figures could equally be presented as 54 per cent of points of interest are within PTAL 3-6. Again, no attempt is made at determining likely demand to each of these points (for instance, a car repair facility will not be of interest to someone who does not own a car, nor will it be a weekly, monthly or even regular destination for the vast majority of households) or indeed how close people live to such services (given the proportion of current residents that live in PTAL 2, it is not surprising that amenities also locate there, but these will often be accessible by foot or cycle if not by public transport).

Claim 4: Car ownership is high in Hillingdon, ownership does not translate to use and many cars are not used for commuting (pages 22-29)

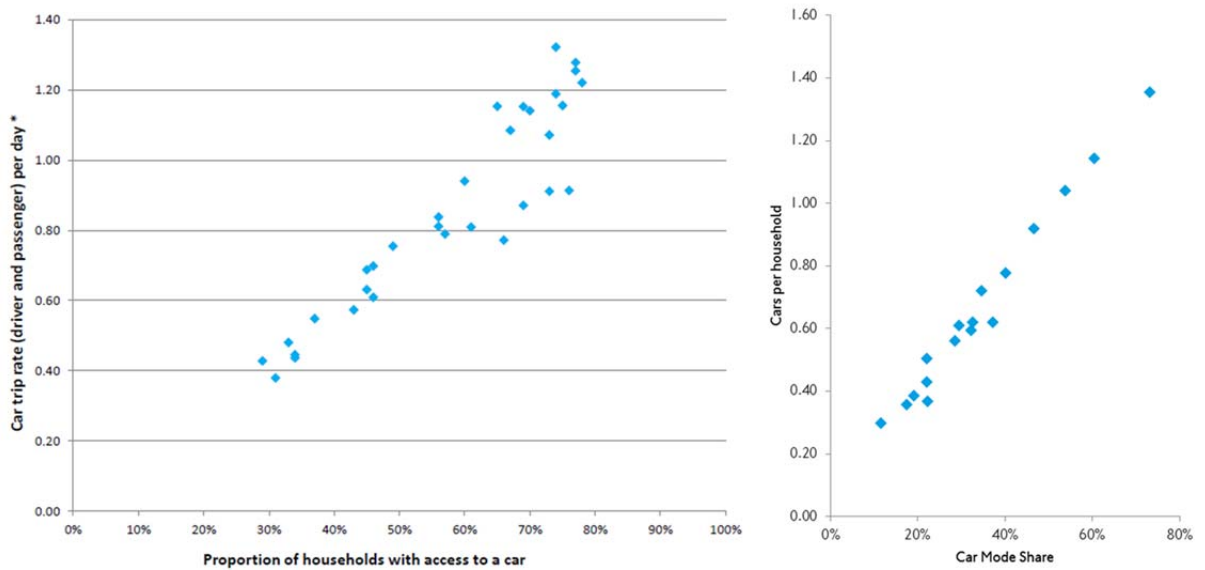
It is true that car ownership across Hillingdon as a whole is high for London, but ownership does vary by public transport access, and **almost half of Hillingdon households in PTAL 4-6 do not own a car**. This is similar to well connected areas of other London boroughs on the GLA boundary and suggests that car ownership in Hillingdon is in part explained by its distribution of PTAL, rather than a need for greater parking provision at higher PTAL, where growth will be focused. We also contend that local policy influences ownership levels and that ownership does not necessarily imply need.

⁵ 12 per cent of trips in Hillingdon are for commuting purposes, London Travel Demand Survey

⁶ Analysis of Cycling Potential 2016 (2017) Transport for London: <http://content.tfl.gov.uk/analysis-of-cycling-potential-2016.pdf>

LB Hillingdon also appears to be claiming that ownership does not necessarily translate into use, specifically travelling to work. While there are several factors that influence this relationship, the Hillingdon analysis, again, only uses commuting car trips rather than all trips, and when more comprehensive and granular data is considered (such as all London boroughs or PTAL within inner and outer London, as shown in Figure 2) a much clearer relationship emerges.

Figure 2: Household car ownership vs average car trip rate by borough (left) and average number of cars per household and average car mode share by inner and outer London PTAL (right)



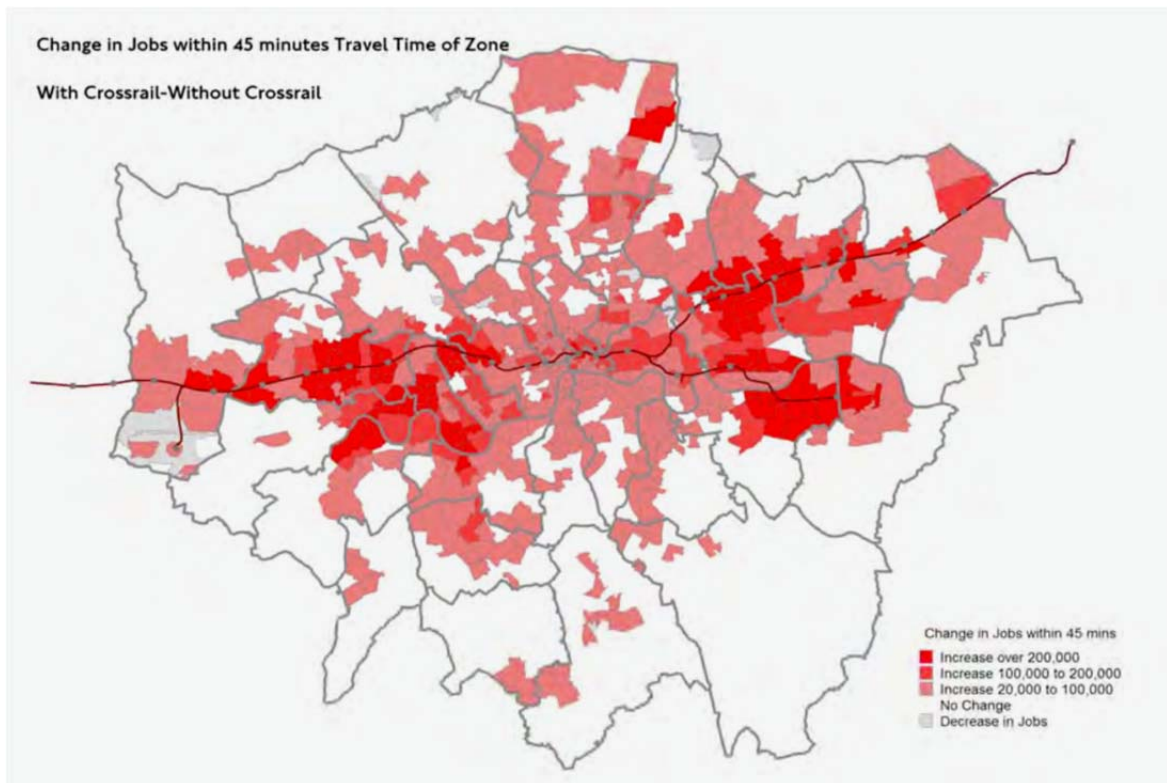
*based on the average daily trip rate over a seven-day week

Source: London Travel Demand Survey

Claim 5: Cars are important for Hillingdon residents to travel to work (pages 30-40)

This claim does not sit particularly well alongside the previous section, as the argument appears to simultaneously state both that cars are important to access work and that they are not necessarily used to travel to work. Nevertheless, it is true that existing Hillingdon residents are less likely to work in central London and more likely to drive to work than residents of other London boroughs. However, the analysis again does not consider residents of new development specifically. Hayes, for instance, will have a high quality, direct rail service to some of London’s biggest employment destinations. This area will be one of those that benefits the most from the Elizabeth line (see Figure 3) and as such the commuting patterns of those living in new developments there would be expected to be significantly different to existing residents across the whole of Hillingdon.

Figure 3: Change in access to jobs within 45 minutes with the Elizabeth line



Source: Crossrail Business Case Update: Summary report, July 2011

For office parking standards, we acknowledge the relatively high proportion of workers in Hillingdon arriving from outside London. However, the standards for outer London (outside of opportunity areas, where public transport enhancements are targeted) remain the same as the previous Plan (1 space per 100 sqm) and the draft Plan retains flexibility for outer London boroughs such as Hillingdon to identify specific areas through their local plan where more generous standards should be applied (up to 1 space per 50 sqm), allowing for this evidence to be reflected.

3. CONCLUSION

The various limitations of this analysis, and in particular failure to include representative journey patterns or consider where growth will be located, lead us to conclude that the report is not sound evidence as it does not reflect observed journeys or the drive to locate new development in sustainable locations. As such, we do not believe it is relevant to discussions regarding strategic parking standards at a London-wide level, particularly as these standards already allow for greater provision in less well connected areas⁷ and in outer London as a whole.

⁷ The residential car parking standards set out in Policy T6.1 cater for existing levels of ownership where alternatives are more limited (see Figure 16, Residential Car Parking evidence report (2017) Transport for London)