

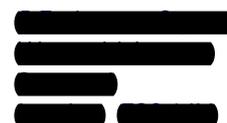


James Bridgewater
Planning Inspector
c/o Manisha Pabari & Judith Dickson

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Transport for London
City Planning



www.tfl.gov.uk

26th July 2018

Dear Mr Bridgewater,

Please see below TfL's updated comments and recommendations relating to Policy DMT 5, Policy DMT 6 and the parking standards, set out in Table 1b in Appendix C of Hillingdon's Local Plan Part 2.

Strategic Importance of Parking Standards

The draft London Plan and Mayor's Transport Strategy sets out the importance of good growth in London, increasing densities across London alongside reducing vehicle dominance and encouraging active travel and public transport use. Borough-led traffic reduction strategies and planning policies that reduce car dependence and dominance and free up road space for increased provision for sustainable modes and essential motorised journeys (e.g. freight and emergency vehicles) are essential for this target to be met.

As the strategic highways authority, TfL needs to efficiently manage London's road network, reducing levels of congestion as well as encouraging more walking, cycling and public transport use. It is important that all boroughs contribute to this, especially considering the impact of car travel on other boroughs in London. It is therefore vital that a new approach is taken to car parking, helping to reduce the dominance of vehicles on our streets and support higher density developments in sustainable locations.

There is a clear relationship between parking provision at a new development and its residents' levels of car ownership and use. Parking is closely associated with higher levels of car ownership, with residents in areas with higher car ownership making more car trips¹. While some residents prioritise the ability to park and own a car, a majority of those living in new development², including

¹ London Plan evidence base – Residential Car Parking (TfL 2017)

² Residential Parking Provision in New Developments (TfL 2012)

those from outer London, state that access to public transport, work and local services are a major influence in choosing where to live. Parking policy can play a key role in influencing the decisions of those who could potentially decide not to own a car and prioritise living in areas closer to local amenities and public transport.

It is important to emphasise that existing residences will not be affected by the proposed parking standards as they only apply to new developments. High population growth is forecast in Hillingdon, concentrated in areas that are well connected by public transport, as shown by Figure 1. Denser development will be needed to support this growth, which will increase demand for public transport, active travel, deliveries and servicing. Parking restraints are crucial to enable us to manage the pressures on the road network, prevent additional congestion, and reduce air pollution as well as freeing up vital space for more homes and other uses. Excessive parking standards will otherwise constrain future development since the impacts on the road network will not be able to be mitigated. If the Mayor's mode share target is to be achieved, car ownership cannot simply continue to grow with the population. This is demonstrated by Figure 2, which illustrates how total car ownership in Hillingdon will need to remain consistent with today's levels in the years approaching 2041.

Conformity with London Plan

Residential parking

Hillingdon's proposed car parking standards for residential dwellings (C3) are neither in conformity with the adopted nor the draft London Plan.

The parking addendum to Chapter 6 of the adopted London Plan (March 2016) sets out parking standards. Tables 10.3, 10.4 and 10.5 in Chapter 10 of the draft London Plan (December 2017) provide revised standards.

A comparison with the adopted London Plan is set out below with red indicating where proposed standards are not in conformity:

	Studio Flat	1 – 2 Bed Flat	3 – 4 Bed Flat	Dwelling with curtilage
Proposed Hillingdon maximum standard	1 space per 2 units*	1 – 1.5 space per unit*	2 spaces per unit*	2 spaces per unit
Adopted London Plan maximum standard	0.5 spaces per unit	1 space per unit	1.5 spaces per unit	1 – 1.5 spaces per unit

*Visitor parking should be provided in addition

The adopted London Plan allows higher maxima in some limited areas (generally PTAL 0 – 1) rather than borough-wide when clear justification via a robust evidence base³ can be made. TfL does not accept that a convincing case has been presented in Hillingdon’s parking report to justify a divergence from the London Plan on a borough-wide basis and in particular places well served by public transport with higher PTALs. It is important not to return to inappropriate ‘predict and provide’ policies which do not adequately reflect Mayoral aspirations for good growth, but these standards actually go above existing demand (the average number of cars per household is 1.1⁴).

The draft London Plan includes revised residential parking standards that differentiate on the basis of PTAL rather than unit size. In Hillingdon, the following maximum standards would apply per unit. These acknowledge that greater provision is needed where public transport is least available.

PTAL	Maximum standard
PTAL 5 - 6	Car Free
PTAL 4 (and all of Hayes/Heathrow Opportunity Areas)	0.5 spaces
PTAL 3	0.75 spaces
PTAL 2	1 space
PTAL 0 – 1	1.5 spaces

To ensure ongoing conformity and clarity, TfL recommends that Hillingdon’s proposed standards should state that the adopted London Plan residential parking standards current at the time will be applied. The footnote requiring visitor parking to be provided in addition to the maximum standard should be removed.

Office parking

Hillingdon’s proposed car parking standards for Offices (B1) and other employment uses are not in conformity with either the adopted or draft London Plans and represent a change from the adopted Hillingdon standards, which previously were in conformity.

³ See the Inspector’s report of the examination into the London Borough of Redbridge local plan for commentary on the need for evidence to deviation from London Plan standards. <https://www.redbridge.gov.uk/media/4732/redbridge-local-plan-inspectors-report.pdf>

⁴ London Travel Demand Survey 2012/13-2014/15

Hillingdon propose that a maximum of 1 space per 100 sqm is replaced by a maximum of 1 space per 50 – 100 sqm. Although the adopted and draft London Plans provide flexibility to allow up to 1 space per 50 sqm, this is only specific designated areas, where account has been taken of regeneration need, congestion and air quality impacts and an absence of public transport and existing car parking. This has not been demonstrated and instead been applied indiscriminately borough-wide.

Retail parking

Hillingdon's proposed car parking standards for retail (A1) uses are in accordance with the adopted London Plan standards (March 2016); however the draft Plan includes modified retail parking standards which have been developed on the basis of new retail being located using a town centre first approach, as set out in Policy SD8 Town centres: development principles and Development Plan Documents.

Cycle Parking

Hillingdon's proposed Local Plan (October 2015) includes cycle parking standards in Appendix C Table 1b, which are labelled as maximum requirements. This contradicts both the London Plan and previous Hillingdon standards, which refer to minimum requirements. TfL is not aware of any London borough that has adopted maximum rather than minimum cycle parking standards as this would be contrary to strategic and local policies to encourage cycling.

Table 6.3 in the adopted London Plan (March 2016) provides cycle parking standards for a range of land uses. Table 10.2 in the draft London Plan includes revised standards that require higher provision for 1 bedroom dwellings. Figure 10.2 indicates areas that require higher minimum standards for B1 - offices and A1 – A5 classes, including Uxbridge town centre.

Cycle parking standards should be amended to indicate they are minimum requirements, and cycle parking standards for each land use should be amended to conform to the standards in the draft London Plan. TfL is not aware of any justification or evidence submitted by Hillingdon to support variation from London Plan cycle parking standards.

To ensure ongoing conformity and clarity, TfL recommends that the proposed standards should state that the adopted London Plan minimum cycle parking standards current at the time will be applied for all land uses.

SDG's 'Hillingdon Parking standards Justification Pack'

The evidence presented in SDG's report does not sufficiently justify why Hillingdon require proposed borough-wide parking standards for all uses that do not vary based on public transport provision or planning designation.

London Plan (adopted and draft) policy is fundamentally opposed to borough-wide standards. Figure 3 illustrates how PTAL varies across the borough, highlighting areas with better access, including PTAL 3-6 or within 800m of a town centre, which the draft London Plan specifically identifies as a particular source from which boroughs should look to meet their housing targets. The white areas represent land unsuitable for development, including Green Belt, where parking standards would not apply. Parts of the borough, such as Hayes and Harlington and West Drayton, will benefit from Elizabeth line services and improved bus services, which will offer residents more alternatives.⁵ We therefore strongly object to high levels of parking provision in areas of high PTALs, including those resulting from recent high levels of transport investment and around town centres.

The council states that more generous parking levels are required to compete against areas outside of London for new housing and employment, but the study does not evidence this as it focuses specifically on trips within Hillingdon. The data used in the review is selective, not considered robust and has led to erroneous conclusions.

Much of the data presented focuses on commuting, which makes up only 18 per cent of trips in London. The analysis presented effectively excludes the majority of trips, such as those made by any group that does not commute to a workplace or journeys made for other purposes such as shopping, leisure or education. Figure 4 shows that trips made by Hillingdon residents for purposes other than commuting outnumber commuting journeys and have larger active travel and public transport mode shares.

Forty-three percent of Hillingdon residents work within the borough, which suggests that there is potential for commuter trips to be made by active travel as well as public transport.

Figures 5 and 6 identify trips that are currently made by a motorised mode (car, motorcycle, taxi or public transport) that could reasonably be made by cycling and walking respectively. This demonstrates that specific areas within Hillingdon have significant potential for mode shift towards cycling and walking that have not been considered in the evidence pack.

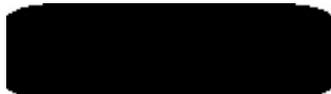
⁵ Car-free developments are being planned or are underway in areas of Hounslow and Ealing that will be served by the Elizabeth line which demonstrates the acceptance of this type of development in this part of London.

Summary

TfL considers that Hillingdon's proposed policies and standards depart significantly from the adopted and the draft London Plan and are likely to further encourage car travel and disincentivise active travel and public transport use, in direct conflict with the Mayor's aims, as set out in the Mayor's Transport Strategy⁶ and draft London Plan. They also risk undermining delivering good growth, making efficient use of space and optimising densities that will be needed to help meet Hillingdon's housing target. More widely, they take insufficient account of the impacts on health, bus reliability and TfL and Hillingdon's responsibilities as highway authorities. In the context of a growing population and limited road space, space-efficient modes of transport need to be prioritised.

TfL therefore requests Hillingdon Council to state in their Local Plan that the adopted London Plan parking standards current at the time will be applied for all uses.

Yours sincerely



Lucinda Turner
Director of Spatial Planning



⁶ Published March 2018

Figure 1: Population change between 2011 and 2041 (source: London Transport Studies model v7.1)

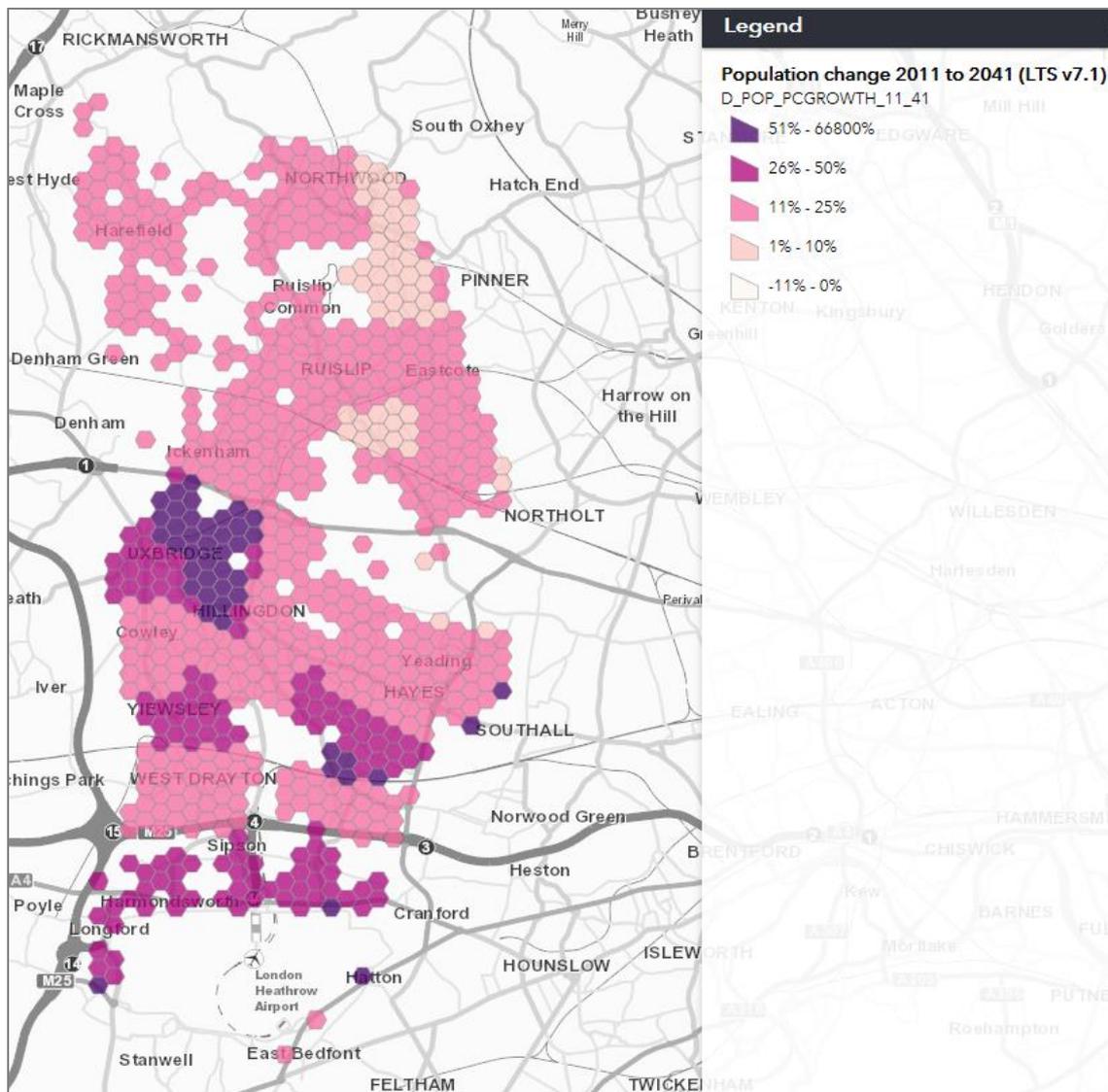


Figure 2: Target for car ownership in Hillingdon (Source: MTS borough data pack)

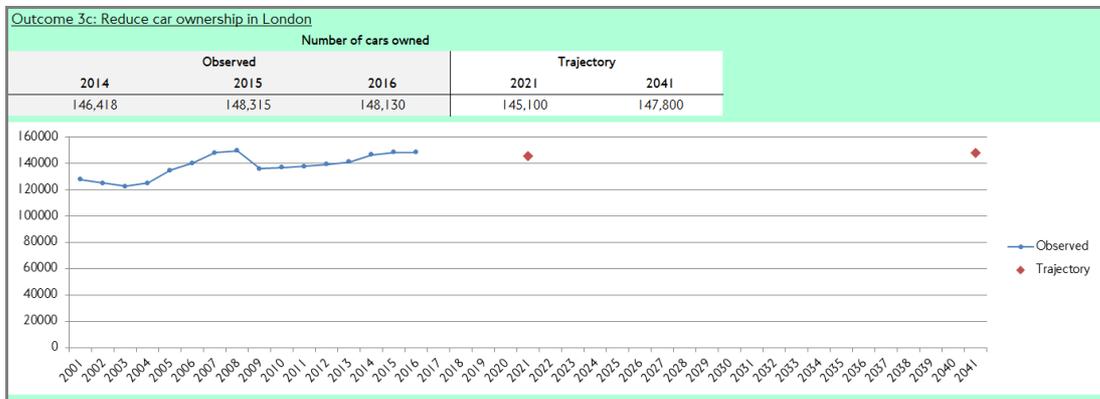


Figure 3: 2021 PTAL map of Hillingdon

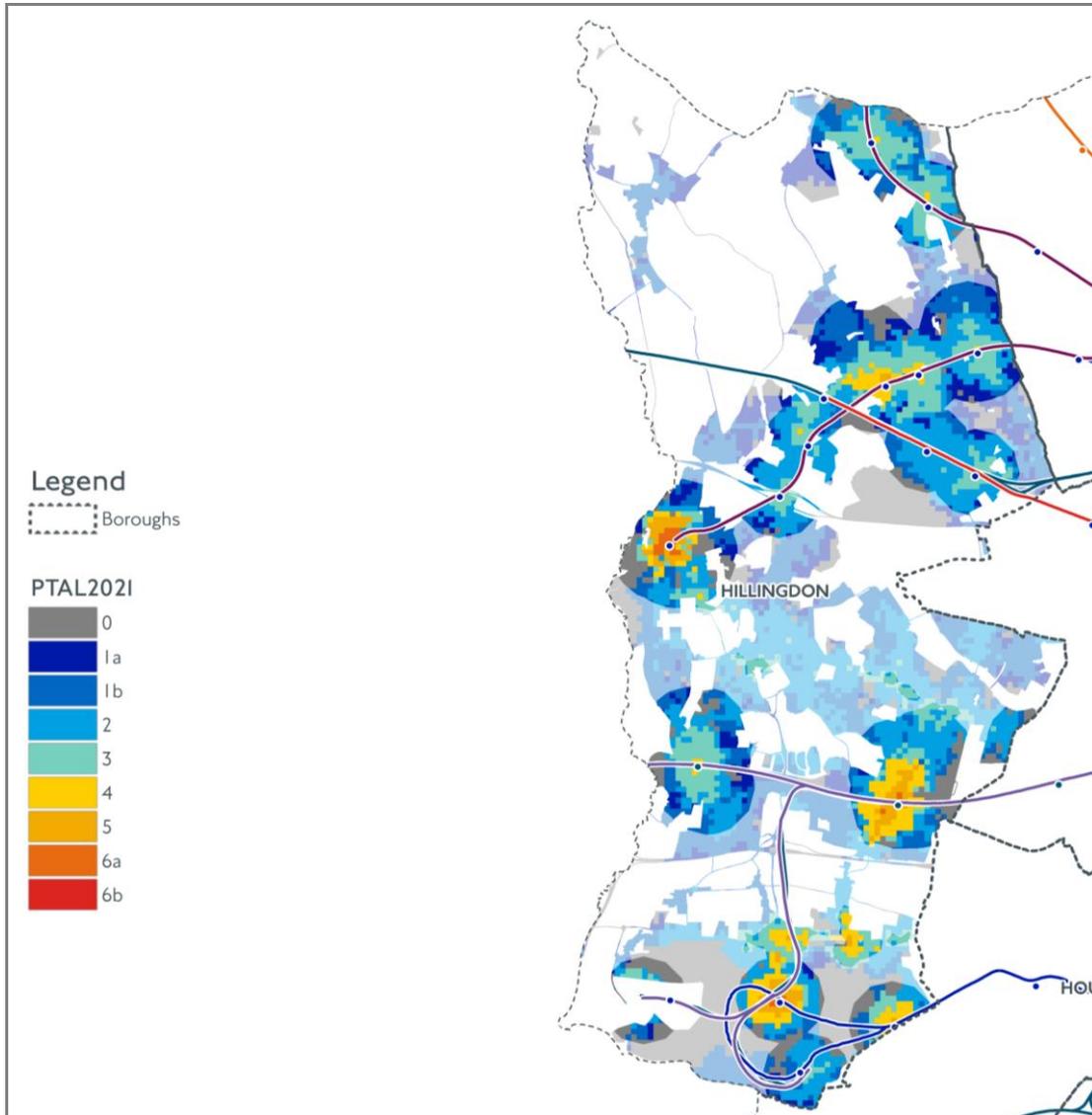


Figure 4: Trip purpose by main mode, Hillingdon residents (Source: London Travel Demand Survey 2012-2016)

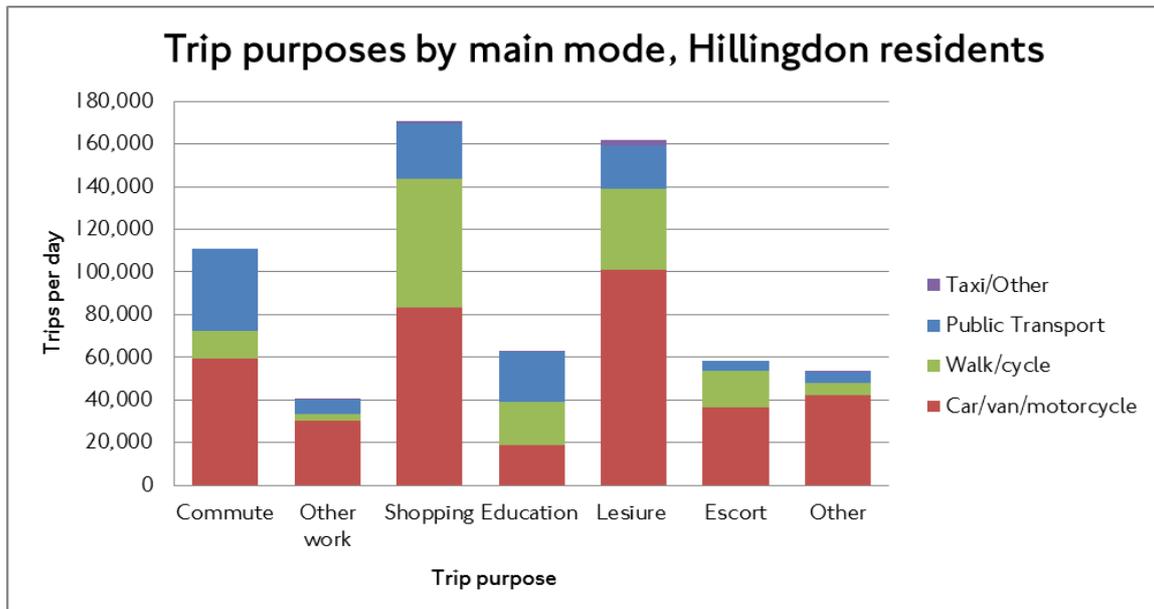


Figure 5: Cycling Potential (Switchable trips 2010 – 15) (Source: The Analysis of Cycling Potential 2016, TfL)

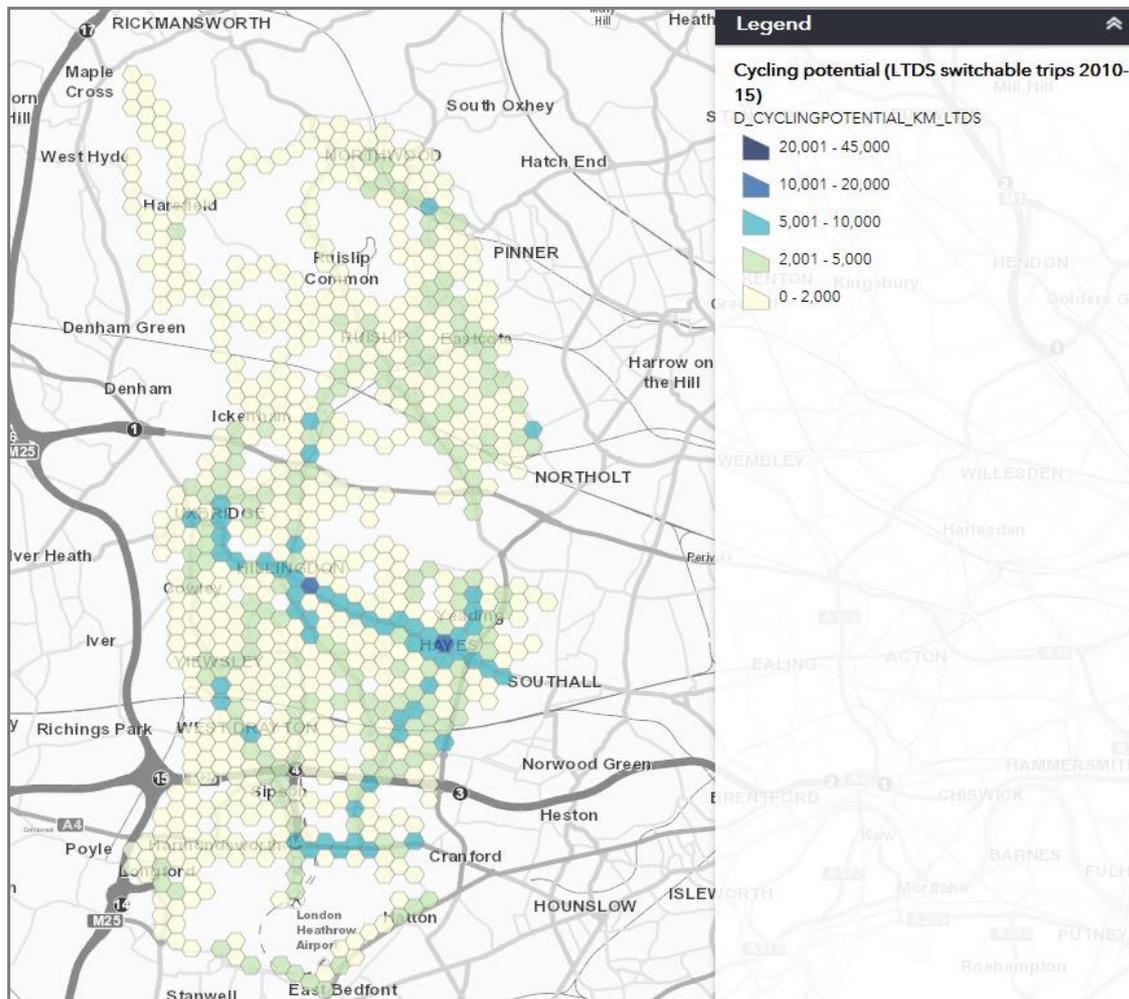


Figure 6: Walking Potential (LTDS switchable trips 2010-15) (Source: the Analysis of Walking Potential 2016, TfL)

