

Response to the draft Minor Alterations to the London Plan

June 2015



Introduction

London Cycling Campaign (LCC) is the capital's leading cycling organisation with more than 40,000 members and supporters. We welcome the opportunity to comment on the draft Minor Alterations to the London Plan.

LCC notes that the Minor alterations to the London Plan (MALP), as regards car parking, are being proposed not as an initiative of the Mayor, for the further improvement of the capital, but as a direct response (MALP page 1) to the coalition government's nationwide directive that "more (car parking) spaces should be provided alongside new homes that families want and need."

Thus the proposed alterations do not stem from the unique needs of the nation's capital, a city which has successfully been reducing car dependency and increasing the use of public transport, walking and cycling, but to satisfy a nationwide policy that, if followed, could, as the MALP Integrated Impact Assessment (IIA) acknowledges, have negative impacts on Londoners and their city.

We also note that the proposed MALP and the IIA repeatedly refer to a 'flexible' approach to car parking where what is meant is either 'more generous standards' (MALP page 3) or no restrictions on car parking provision. In this response we have assumed that 'flexible' in the MALP means higher levels of car parking.

It is surprising that the MALP is considered necessary given that the 'flexible approach' demanded by the new government policy is already contained in the existing London Plan within policy 6.13:

"c. in town centres where there are identified issues of vitality and viability, the need to regenerate such centres may require a more flexible approach to the provision of public car parking to serve the town centre as a whole

d. outer London boroughs wishing to promote a more generous standard for office developments would need to take into account in a DPD

- a regeneration need – no significant adverse impact on congestion or air quality*
- a lack (now and in future) of public transport*
- a lack of existing on or off street parking*
- a commitment to provide space for electric and car club vehicles, bicycles and parking for disabled people above the minimum thresholds*
- a requirement, via Travel Plans, to reduce provision over time."*

Thus boroughs can already permit higher parking levels in new developments while remaining within London Plan guidelines. The MALP would therefore appear to be an encouragement to provide

more parking, to meet national government guidance, despite the negative outcomes (as noted in the IIA) for London.

LCC advises that the MALP changes, as regards car parking, be dropped because of the numerous negative impacts (cited in the IIA) on space for housing (land take), motor traffic congestion, air pollution, health impacts, climate change, water resources, biodiversity, open space provision (land take) and liveability.

The potential gainers from higher car parking provision in new outer London developments will most likely be developers (IIA page 22: ‘this option(more car parking spaces) is likely to improve viability for housing developers’) who can sell additional parking spaces for £20,000 each (recent pricing in Newham), with very little increase in overall construction cost.

The IIA Evidence

As noted above, the IIA lists a large number of negative impacts which it seeks to meliorate by stating that:

The proposed alteration only affects a small proportion of London where a limited amount of housing is delivered. Therefore both positive and negative impacts are relatively limited. (IIA page 4) .

This approach is used to downplay negative impacts across the categories selected for the IIA. Thus , for example, the impact on health, according to the IIA , will be minor because ‘ as housing will generally be low density , the number of additional homes and therefore car journeys will be relatively minor’ (IIA page 21). Given London’s population growth and the need for 49,000 new homes per year in London (2014 GLA Housing in London report), double the current construction level, it is reasonable to expect the ‘number of additional homes and therefore car journeys’ to rise significantly.

Conversely in considering the Alternative Option of ‘Not update the car parking policies’, the IIA chooses to downplay the positives by, for example, stating that the existing policy did not cater for people with mobility issues even though it includes a requirement for parking for disabled people; and, by not boosting car ownership and use, may encourage boroughs to improve public transport to new developments.

In the IIA quote cited above we do not understand how Outer London can be considered a ‘small proportion’ of the capital and, given the declared concern of politicians of all parties about the lack of housing in London , we would expect significantly more housing to be delivered across all parts of London, not just Inner London.

Below we provide comments on the arguments that are used to support the ‘preferred option.’

The first alternative option – to promote higher car parking levels for new developments in an even wider area (where PTALs range from 0 to 2/3) could be seen as an inclusion to make the ‘preferred option’ seem a more acceptable choice.

We note that the actual changes to the London Plan include policy 6.42j which does in fact recommend higher car parking levels in ‘some limited parts of areas within PTAL2. ’ Thus the

identified negatives, in the IIA , of the first alternative option of extending the higher parking levels to PTALS 2/3 must be taken to apply to the MALP proposals at least in part.

Regeneration and Land use

No mention is made of the dis-incentive to improve PTAL or walking and cycling opportunities. The land take aspect is downplayed . For every 12 additional car spaces three more two bedroom flats (per storey) could be built.

Biodiversity

This is accepted in the document as a negative impact of the preferred option.

Health and well being

It is accepted in the document that more car parking will lead to more car journeys and fewer journeys on foot and by cycle. These impacts are downplayed as 'marginal.' If an additional 25,000 car parking spaces are provided annually (to meet housing need in outer London coupled with an additional car parking space per housing unit) that could mean 50,000 additional car journeys per day, with a simultaneous reduction in public transport, walking and cycling journeys. This would run counter to the Mayor's desire to reduce car dependency and increase active travel and health.

See note above on downplaying housing provision and densities.

Equalities

We note that night-time tube travel will become possible as of September 2015 in some parts of London and may be further expanded to most parts of London. We also note that the existing London Plan specifically requires provision of car parking for people with disabilities. Both these factors are ignored in the negative impact attributed to the 'Not update' category.

As the document acknowledges increasing car dependency will dis-incentivise improvements in public transport, walking and cycling programmes which benefit not only those who drive (by reducing congestion, pollution and improving health), but also the millions of Londoners who do not own a car.

Housing

See note above on the benefits for developers – the prime positive impact in this category. Also, as noted above, the aim in London must be to improve PTAL, walking and cycling rather than boost car ownership and use which will only increase congestion across the whole city.

Employment

The Mayor has stated clearly that he considers there is an significant oversupply of public hire vehicles in London. Providing free or low cost parking for such vehicles will further increase their numbers. Increased private car ownership fails to make good use of car-share fleets which provide a useful service for those without cars or with limited access to a private car.

Stable Economy

While the obvious negative effect of congestion as a consequence of boosting car use is mentioned under the Alternative option one, it is not mentioned at all under the Preferred option giving that a score of 'Minor positive effect ' but no negative effect. This is unjustifiably misleading as any boost in car ownership and use will contribute to congestion.

In the 'Not update' option the so called 'negative effect' that is claimed does not make sense.

'This option is less likely to support town centres and offices in Outer London as they are not easily accessed by car by those who live relatively close.'

It is self evident that less congestion and better public transport access improves business in town centres. Westfield Stratford, a very large shopping centre, has high footfalls despite the fact that its 5000-space car park is invariably only partially used and never full.

Flood risk and climate change adaptation

This is accepted in the document as a negative impact of the preferred option.

Climate change mitigation and energy

This is accepted in the document as a negative impact of the preferred option.

Waste

No impacts expected.

Accessibility and mobility

The preferred option will encourage travel by motor car and disincentivise other modes of transport.

Built and historic environment

As in other cases mentioned above the 'positive' impact claimed for the preferred option seeks to show that because the density of new housing will be low (which it may not be, if housing needs are to be met) the negative impact will be low and therefore it should count as a minor positive effect. Claiming that the damage done will be low does not make it a positive – it remains a negative effect.

Car parks serve a function but they are universally accepted as not contributing in a positive way to the built and historic environment from any visual or aesthetic point of view.

In cities like Amsterdam high demand for car parking is mitigated by higher parking charges and provision of high grade cycling facilities. This has encouraged cycling to the extent that 50% of journeys in central Amsterdam are made by cycle with resulting benefits for congestion, air quality and an improved built and historic environment. As the Mayor has noted there is no reason why London, with the provision of suitable facilities, should not return to its early 19th Century level of cycling when one in 20 journeys were by cycle.

Liveability and Place

The positive impact of the 'Not update' option is recognised by stating this option would not further encourage additional use of private vehicles. But the attributed negative is very evidently a contrived

and unsubstantiated phrase' the option bears on the right of an individual to own a car and may not promote a perceived sense of place held by the community' (IIA Page 24)

We do not believe it is the Mayor's aim to encourage six million adult Londoners to own and use a car. This would mean certain gridlock and would spell the end of the capital as a viable and successful city. The preferred option will bring us closer to this dystopian vision. Motor manufacturers and sellers in the UK, whose aim it is to sell more cars, spend upwards of £500 million per year persuading individuals to purchase vehicles. With such powerful messaging complemented by the creation of more new storage for vehicles ownership and use of vehicles will be encouraged. Surely the more important 'right' of Londoners is to enjoy a healthy and productive life.

We fail to understand how fewer car parking places 'may not promote a perceived sense of place held by the community.' A place of worship, a village green, a historical house may all promote a sense of place but we question how additional car parking spaces promote a 'sense of place.'

Open space

This is accepted in the document as a negative impact of the preferred option.

Air quality

This is accepted in the document as a negative impact of the preferred option.

We note that in an attempt to meliorate the evident major negative impact of the preferred option the IIA again relies on assumption that housing density will be low (see above) and also cites another Mayoral policy, to increase cycling in Outer London as a meliorating effect. Elsewhere the document accepts that increasing car parking will have negative impacts on cycling.

IIA Summary page 25

We note that opening statement in the summary of the Integrated Impact Assessment recognises the negative impacts of the changes in the MALP even though it judges that these are minor.

"4.13 The Sustainability Appraisal suggests that generally there will be minor negative impacts on the natural environment due to the preferred option. This is due to a likely increase in pollution, and hardstand that limits the potential for open space and biodiversity and increases surface water run-off and the urban heat island effect."

4.13 It is likely the preferred approach will have a negative effect on health due to the likely increase in air pollution and a decrease in walking and cycling. The preferred approach is considered to have a neutral effect on community safety, subject to good design. The 'do nothing' approach has no effect on many of the environmental objectives, which also reflects the FALP appraisal, but a negative effect on the social objectives.

As we have stated above, the impact of increased car ownership and use on motor traffic congestion is downplayed in the Integrated Impact Assessment. Nonetheless the authors felt it necessary in the summary to signal this very obvious downside of increasing car ownership in London:

4.14 *“However, locally the effects could be felt more strongly, especially if there is some traffic congestion”*

Relegating this important impact to a minor role could have serious negative consequences for London Plan outcomes. It has been estimated by TfL (TfL (2014), Traffic Note 4, TfL Road Network Performance Traffic Analysis Centre) that motor traffic congestions costs London £4bn a year. Adding to this very substantial cost by relaxing the constraints on car ownership and use throughout Outer London will have an adverse effect.

As noted at the outset we recommend that the MALP changes as regards car parking are not adopted because of the potential negative impacts for Londoners.