Dear Ms Heywood,

Thank you for considering the evidence that we presented at London Borough of Havering's (LBH) Examination in Public (EiP) for Matter 8 on 17 October 2019 in relation to the parking standards set out in Policy 24.

Since then, we have had a number of constructive discussions with LBH officers to try and reach a compromise regarding their Local Plan parking standards within the framework set out by the adopted London Plan. We were under the impression that we were close to a compromise that modified the approach to parking standards in PTAL 0-2 to better reflect the London Plan policy, but this was in the context of requiring the borough to remove the requirement for minimum standards in PTAL 5-6, as these locations are best served by public transport, have higher densities and are in close proximity to destinations important for the whole community. This means the impact of car use would be greater and the best use of land could not be made. Unfortunately, we understand that a decision has been made to continue with minimum parking standards in PTAL 5-6, which therefore means that we must maintain our objection.

It is our understanding that LBH are submitting modifications to Table 5 in Policy 24 for PTAL 0-2 to both (a) update the minimum parking standards to be in line with the adopted London Plan maximums, and (b) clarify the areas in LBH where minimums for PTAL 2\(^1\) will be permitted. We welcome the first of these changes, which brings down the minimums required to within the maxima set out in the London Plan.

\(^1\) Areas of PTAL 2 where minimum standards will be applied are specifically parts of the borough that are PTAL 2 and are 800 metres or more away from rail stations. The London Plan parking standards will apply to all other parts of the borough that are PTAL 2.
The second amendment, however, was a compromise reached on the basis that minimums in PTAL 5-6 were removed from policy. We considered this represented a balanced set of changes - but without the other crucial change at PTAL 5-6 we must object to the second modification compromise and would seek further changes to the application of minimums in PTAL 2.

Our concern with this second modification relates to putting too much of LBH’s housing and employment growth at risk, restricting the densification of development in the borough and potentially reducing the feasibility of meeting housing need in the future. This would especially be in case in Beam Park, for example, where new developments built before the station is developed could be subject to minimum parking standards permitted for areas of PTAL 2. This would not make the most out of public sector investment in the railways and lead to less dense, more car dependent development in this important Opportunity Area.

In the context of the continued proposed minimums at the highest PTALs, this is not accepted. As highlighted we had sought to reach a compromise, but this does not work when only one part of the potential compromise solution is actually put forward.

As was discussed at length at the EiP, minimum parking standards in areas of PTAL 5-6 are unacceptable to TfL and this remains our clear view. Significant concerns with this particular aspect of LBH’s approach were also raised at the EiP by Williams Gallagher on behalf of LSREF3 Tiger Romford S.A.R.L. (C/O ELLANDI LLP). Setting minimum parking standards will significantly impact on the quality of developments and the surrounding public realm, undermine our ability to manage traffic and deliver Healthy Streets in these busiest of areas, and restrict the delivery of higher volumes of housing, particularly in and around Romford, which is where most of the growth in LBH within PTAL 5-6 is forecast. We therefore strongly believe that the minimum parking standards in areas of PTAL 5-6 should be removed.

In summary, we do believe a compromise could potentially be reached and would support LBH’s modifications to their parking standards for PTAL 0-2 if minimum standards in PTAL 5-6 were removed. We have gone to great lengths to work with LBH to discuss a number of possibilities to identify areas of PTAL 2 that would be appropriate to be covered by minimum standards. This included analysis and consideration of other options where minimum standards for PTAL 2 would be acceptable, such as areas of PTAL 2 outside Opportunity Areas and outside an 800m radius of both station and town centre boundaries as illustrated in Appendix 1.

We recognise that the current transport network in Havering means that car travel will continue to play more of a role than it does in some other parts of London.
However, congestion, emissions and public health are challenges facing our city that span administrative boundaries and all boroughs must make a contribution to addressing them. This approach is increasingly being recognised by other outer London boroughs, including the London Boroughs of Merton and Bexley, who have both recently published draft Local Plans that generally follow the approach set out for parking in the draft London Plan, which goes somewhat further in restricting parking than the adopted Plan. Furthermore, minimum parking standards for residential uses in PTALs 0–1 in London Borough of Redbridge were refused by the Inspector, due to lack of robust evidence.²

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 Londoners travel, the city will not be able to provide sufficient housing to meet the objectively assessed need, and the London Plan cannot be delivered.

Regrettably, we are therefore unable to put forward an amendment to LBH’s Local Plan parking standards that can be endorsed by both LBH and TfL. We remain firm in our objections that the parking standards set out in Policy 24 are not in conformity with the London Plan in the areas depicted in the map in Appendix 2 below.

Yours sincerely,

Josephine Vos

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Appendix 1
Areas of PTAL 2 where minimum parking standards (in line with London Plan maximums) would be accepted

Appendix 2
Havering’s Local Plan parking conformity map