Local Development Framework

Submission Stage
Development Management policies
Residential Car Parking Standards

September 2011
Residential Car Parking Standards in Barnet

1. Introduction and Background

The London Plan has set a range of maximum residential parking standards that are intended to apply across London. This is broadly consistent with guidance set out in PPG13 (January 2011) which was recently revised with respect to parking standards. In this revision of PPG13 the government encouraged councils to set what they considered were the right parking policies for their area. This has weakened but not removed the national planning policy backing for the approach adopted by the GLA. However, the Mayor’s approach does not preclude borough’s such as Barnet from setting variant standards, provided Barnet has regard to the London Plan standards, and can justify a variation based on local evidence.

Barnet’s UDP already contains an approved departure from the previous London Plan for residential parking standards, which was subject to extensive scrutiny and challenge throughout the UDP adoption process and subsequent approval required for ‘saving’ UDP policies. This paper contains Barnet’s case for this position to be continued, particularly in light of the latest version of the London Plan, which seeks to further reduce the level of parking provision where developments are in areas of good public transport accessibility which is considered will have a detrimental impact on Barnet. The Barnet UDP contains residential car parking standards which are considered to be locally appropriate and justified by experience and evidence.

2. Barnet UDP and London Plan residential parking standards

The table below summarises the differences between the Barnet UDP and London Plan residential parking standards. It can be seen that the standards for 4 or more bed and 3 bed residential units are identical, but that there is a difference with the respect to units with 1, and particularly 2 bedrooms. This is reinforced by the more restrictive statement that now accompanies the tabulated standards on page 205 of the London Plan, which refers to significantly less than one space per unit being provided in locations where the public transport accessibility is deemed to be “good”.

<table>
<thead>
<tr>
<th>Number of beds</th>
<th>Barnet UDP (Policy M14)</th>
<th>London Plan*</th>
</tr>
</thead>
<tbody>
<tr>
<td>4 or more</td>
<td>2 to 1.5 per unit</td>
<td>2 to 1.5 per unit</td>
</tr>
<tr>
<td>3</td>
<td>1.5 to 1 per unit</td>
<td>1.5 to 1 per unit</td>
</tr>
<tr>
<td>2</td>
<td>1.5 to 1 per unit</td>
<td>Less than 1 per unit</td>
</tr>
<tr>
<td>1</td>
<td>1 to less than 1 per unit</td>
<td>Less than 1 per unit</td>
</tr>
</tbody>
</table>

* London Plan states below the table on page 205 that “all developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit”

A “Good” public transport accessibility level (PTAL) is not defined explicitly by the GLA in the London Plan, although according to TfL 2010 guidance it is equivalent to PTAL 4 (and therefore, or better), and the statement is presumed to apply to the lowest level of parking in the London Plan, one and two bed flats, although it is somewhat ambiguous, and as written it could in theory apply to 3 or 4 bed flats or houses as well.
The London borough of Barnet does not agree with the London Plan in the above respects and strongly believes that the existing UDP residential parking standards, unmodified, should be adopted as part of the Barnet LDF. Barnet’s local position has already been justified as part of a formal review of the UDP. Also, it was clearly stated in detailed representations made by the council at the London Plan EIP that, whilst the GLA and LBB parking standards are identical in some respects, the council would continue to apply its own residential parking standards which provide greater flexibility to take into account issues such as public transport accessibility and local parking stress. Concern was expressed at the Examination in Public about the continued approach of uniformly adopting a harsh parking restraint approach in new development regardless of context or low PTAL levels in outer London.

3. Barnet’s experience of using PTALS and applying the UDP parking standards

Barnet’s concern with PTALs is that the PTAL scores measure ease of access to any public transport route, so a location may have a high score because it has good radial links to central London, but this is not necessarily a reflection of more general public transport provision. In the north of the borough, such as High Barnet, many relatively local destinations in the surrounding areas, such as Hertsmere or adjoining boroughs are simply not accessible by public transport to the extent that equivalent local destinations for residents in the south of the borough would be, even though the PTAL score of the locations may be the same. The score in this case reflects accessibility in one direction only and so the real life experience of a level 5 PTAL (for example) is different in different parts of the borough and for many residents at the periphery of the GLA boundary travel to towns in Hertfordshire may be just as important as travel into central London. This needs to be carefully considered as part of the process in determining what the appropriate parking standards should be as part of residential planning applications.

Since adoption in 2006 the Council has assessed the residential parking requirements of each application on its individual merits in line with the UDP standards set out policy M14 and has exercised flexibility, taking into account locality, PTAL and local parking stress. The council takes into account the likelihood of parking occurring on-street, and any detrimental effect on highway conditions and road safety. The council has, in appropriate circumstances, insisted on complementary controls implemented to prevent displacement parking into the area surrounding a development, and secured developer funds to partially or fully fund controls.

UDP policy M14 is considered to have worked very well over the last 5 years, because it has the inherent flexibility to account for the diverse nature of the borough. The standards are not considered to have resulted in an over provision of parking or to have stifled development. In fact developers generally understand Barnet’s position given the varied nature of the borough and want to deliver an appropriate level of parking based on the generally more suburban type of development (and market demand) we entertain. Barnet is a diverse borough ranging from locations like Brent Cross Cricklewood (BXC) that are clearly inner suburban to places like Mill Hill East which is clearly far more rural in nature.

With respect to the PTAL parts of BXC for example have a very low PTAL score, and we have only a few locations where the PTAL is sufficiently high to potentially entertain low car development, especially when consideration is also given to the range of destinations served, which as emphasised above, is also an important factor. Our approach to residential (expected to be mostly flatted) parking provision at BXC illustrates this, with capped ratios, reducing down from a sliding scale of 1:1 for the first phase of housing to 0.7:1 for the last phase, consistent with the improvement in PTAL and the increasing density and mixed use nature of the
development, which will include a new town centre and comprehensive improvements to public transport including a major new railway station.

Barnet’s flexible approach rarely causes difficulties or any unreasonableness from developers, and we are always mindful of the technical submissions on parking and accept parking ratios that meet our UDP standards where they are supported by technically sound pieces of work.

4. 2009 UDP Policy Review

In May 2009 the Secretary of State via GOL directed (agreed with) Barnet to save a range of policies within the UDP including policy M14. Barnet’s reasoning at the time, which continues to be relevant, including to flatted developments, for adopting a different approach for residential car parking was that the provision of suitable car parking within residential development facilitates car ownership as opposed to car use. Many areas of Barnet have poor levels of public transport provision and public transport does not always meet the needs of people living in the suburbs. As a result, car ownership in Barnet is relatively high, although evidence suggests that many residents chose to leave their car at home and travel by other means for commuting trips. The council recognises that in some cases, the use of a motor car is the only transport option.

The council also considers that off-street residential parking will become increasingly important with the growth in ownership of electric vehicles as the parking will provide a place where the vehicle can be recharged. There are legal, practical and safety implications resulting from the charging of electric vehicles on-street and owners of dwellings without off-street parking are likely to encounter difficulties in choosing to operate an electric vehicle rather than fossil fuel powered vehicle.

Also relevant to developments of new flats in Barnet the council considered it necessary to save policy M14 in order to be able to effectively deal with circumstances where a developer is seeking to save money or increase density by not providing off-street parking, particularly in locations where public transport provision is relatively poor and the nature of the development would suggest the future occupiers of the development are likely to want to own a motor car. It would be impracticable to impose parking restrictions on all roads in the borough, especially in more rural areas, and therefore the ability to require the provision of off-street residential parking in some cases is an essential tool in the Council’s ability to manage parking.

5. Parking Demand at flatted developments in Barnet

In Policy 6.13 of the London Plan it is noted that the Mayor wants to see an appropriate balance struck between promoting new development and preventing excessive car parking provision that can undermine use of other modes. Barnet generally supports this stance as the earlier table shows with London Plan and UDP standards being identical apart from those for one and two bed flats, particularly the latter where the Barnet standard is up to 1.5 spaces per unit, whereas the London Plan only permits less than one space per unit. However, the additional note in the London Plan, which refers to all developments in areas of “good” public transport accessibility aiming for significantly less than one space per unit is a potentially significant difference. This is illustrated in the table below, which summarises the results of 2011 car parking surveys carried out at six flatted residential developments in Barnet.

<table>
<thead>
<tr>
<th>Development</th>
<th>Number of units &amp; mix</th>
<th>Total number of parked</th>
<th>Cars per unit</th>
<th>PTAL*</th>
<th>Estimated number of spaces</th>
<th>Notes</th>
</tr>
</thead>
</table>


<table>
<thead>
<tr>
<th>Address</th>
<th>Vehicles</th>
<th>As per London Plan**</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>165 – 175 Great North Way NW4</td>
<td>24 flats (2 one bed, 22 two bed)</td>
<td>37</td>
<td>1.54</td>
</tr>
<tr>
<td>94 – 96 Nether Street N12</td>
<td>9 flats (2 bed)</td>
<td>8</td>
<td>0.88</td>
</tr>
<tr>
<td>Land adjacent to Bunns Lane car park</td>
<td>36 flats (2 bed)</td>
<td>46</td>
<td>1.28</td>
</tr>
<tr>
<td>Spencer House 156 – 162 Station Road NW4</td>
<td>29 flats (3 one bed, 21 two bed, 5 three bed)</td>
<td>20</td>
<td>0.69</td>
</tr>
<tr>
<td>Friern Barnet town hall N11</td>
<td>49 flats (16 one bed, 33 two or three bed)</td>
<td>38</td>
<td>0.78</td>
</tr>
<tr>
<td>Brookside Court, Woodside Grange Road N12</td>
<td>15 flats (2 bed)</td>
<td>13</td>
<td>0.87</td>
</tr>
</tbody>
</table>

*as defined by TfL in their 2010 Transport Assessment best practice guidance document

**given site PTAL level assumes an approximate 50% reduction would be applicable for PTAL 4 (and approximately 40% for PTAL 3) in line with wording beneath table of residential parking standards in the London Plan (page 205)
The surveys sought to determine the level of residential parking for a variety of sites in the borough, by carrying out counts of parked vehicles at 6am on a typical weekday. Four of the sites were in locations where the PTAL was 3 or 4 which matches the TfL definition of ‘moderate’ or ‘good’ PTAL respectively. In comparing the level of residential parking for these sites an approximate 50% reduction in spaces is assumed for PTAL 4 (and approximately 40% for PTAL 3), as an approximation for the term "significantly less than one space per unit". It is clear that for all four sites the application of the London Plan standards would result in less car parking than is currently taking place. This is also the case for the first site, 165-175 Great North Way, which is in a location with a very poor PTAL, where the application of the London Plan standards would result in a level of parking provision substantially less than the parking demand observed in the borough survey. Of the six sites in the table only the final one has a level of observed residential parking that can be accommodated by the London Plan standards.

The table is considered to provide a good ‘snapshot’ of the parking situation with flatted developments in Barnet. It is clear that application of the London Plan standards for developments consisting of one and two bed flats is likely to result in parking stress in adjacent streets, particularly if those streets have no parking controls. Depending on the local situation a deterioration in highway conditions and road safety may also occur. It is likely that new and / or additional parking controls, including new or extended Controlled Parking Zones, would need to be introduced to manage the available on-street parking, which could be unpopular with local communities and have a negative impact on the streetscene.

6. Comparison with Hertsmere parking standards

In section 6.42 of the London Plan it highlights that parking provision can affect patterns of development and the economic success of an area. It goes on to highlight the need to ensure that boroughs adjoining other regions ensure a consistent approach to the level of parking provision. The residential parking standards in the adjacent authority of Hertsmere in Hertfordshire are more generous than those in the London Plan, specifying maximum levels of parking for bedsits / 1 bed properties of 1.5 spaces per unit and 2 spaces per unit for 2 bed properties, which are higher than Barnet’s standards and potentially double those of the London Plan. Accepting that much of Hertsmere is rural in character then a different level of provision is considered appropriate. However, it also clear that there are parts of Barnet which are also essentially suburban fringe / rural in nature, where arguably similar standards would be appropriate and this supports the existing Barnet standards which reflect its “outer” outer London character, and are considered to provide a reasonable balance between London Plan standards that are intended to apply to both inner and outer London, and those of Barnet’s neighbouring local authority in Hertfordshire.

7. Conclusions

In light of the above, in particular our experience to date of successfully applying the adopted 2006 UDP residential car parking standards, the council firmly believes that the UDP standards should continue to apply locally as they are proven to work effectively in Barnet. The parking standards for 1 and 2 bed flats allow Barnet flexibility to vary the provision according to all relevant local circumstances, which is absolutely essential, and was comprehensively justified as part of the GOL UDP review.

The very different circumstances applying between inner and outer London parking demands are not considered to be properly reflected in the London Plan, particularly with respect to Barnet where our communities are generally dependant on the use of the private car for many journeys, and where car ownership, at 1.09, is relatively high. Barnet in particular has a
generally low PTAL, such as in Totteridge, Mill Hill and Friern Barnet, with relatively few locations having high levels of public transport accessibility.

Given the evidence of relatively high levels of parking demand at new developments of 1 and 2 bed flats the council is firmly of the view that the existing and fully examined departure from the London Plan continues to be justified, particularly in light of the change in government stance taken in the January 2011 version of PPG13 and proceedings of the London Plan Examination In Public process, which acknowledges that boroughs could set variant standards.

In conclusion it should be emphasised that Barnet varies considerably in terms of development patterns, accessibility levels and parking demands and therefore requires a locally sensitive and evidenced based approach to car parking standards, particularly for new 1 and 2 bed flats, in order to achieve appropriate and balanced delivery. The council considers that this paper has demonstrated that one size does not, and should not, fit all, and that the survey data and evidence presented here clearly demonstrates that Barnet UDP standards should continue to be applied.