

Public Examination of the Development Management Local Plan

London Borough of Lewisham response to the Inspector's initial query regarding DM29: Car Parking

1. *It is not at all clear precisely what is meant by 'car-limited' development (and whether and to what extent it may differ from 'car-free' development mentioned in CS policy 14). Part 2 of DM29 states criteria (all of which are presumably intended to apply??) for judging where 'car-limited' development may be considered. However, it does not say what this is. This policy needs major clarification. The Council's suggested change (SM32) does not achieve this.*
2. *Does part 1 of the policy mean 'The Council will impose (or operate) parking standards in accordance.....'?*
3. *The Council suggests a presentational change (SM6) concerning reference to the London Plan parking standards, which are to be applied in Lewisham, and the inclusion of an appendix (SM7) setting them out. These are matters of clarity rather than soundness but could be the subject of OMs.*
4. *The Council suggests (SM8) a further potential change to DM29(5) concerning charging points. This would be an appropriate OM.*

(Note a complete list of all the Inspector's initial questions are on the Examination website and can be accessed via the following link:

<http://www.lewisham.gov.uk/myservices/planning/policy/LDF/development-policies/Documents/DMLPInitialQueries.pdf>)

Planning Policy – 13 January 2014

1. Introduction

- 1.1 DM Policy 29 supports the implementation of Core Strategy Policy (CSP14), which states that that a managed and restrained approach to car parking provision will be adopted.

1.2 Policy Context

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- 1.3 At the heart of the National Planning Policy Framework is the presumption in favour of sustainable development. Paragraph 14 states that for Plan making this means that:
 - *Local Planning Authorities should positively seek opportunities to meet the development needs of their areas;*

- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.*

1.4 Paragraph 39 states that “ *If setting local parking standards for residential and non-residential development, local planning authorities should take into account:*

- *the accessibility of the development;*
- *the type, mix and use of development;*
- *the availability of and opportunities for public transport;*
- *local car ownership levels; and*
- *an overall need to reduce the use of high-emission vehicles.*

London Plan

1.5 Policy 6.13 Parking states that “*The Mayor wishes to see an appropriate balance struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport*”. 6.13 (C) states that “*The maximum standards set out in Table 6.2 in the parking addendum, should be applied to planning applications*”.

Core Strategy

1.6 Core Strategy Policy 14 states that “*A managed and restrained approach to car parking provision will be adopted to contribute to the objectives of traffic reduction while protecting the operational needs of major public facilities, essential economic development and the needs of people with disabilities. The car parking standards contained within the London Plan will be used as a basis for assessment. It goes on to state that “Car free status for new development can only be assured where on-street parking is managed so as to prevent parking demand being displaced from the development onto the street. A controlled parking zone (CPZ) may be implemented where appropriate*”.

1.7 Council's Response and Suggested Modification.

1.8 CS Policy 14 states that the “*car free status of for new development can only be assured where on-street parking is managed*”. However, in accordance with the London Plan, new residential or mixed use development must have disabled parking. Paragraph 6A.1 states “*Developments should provide at least one accessible on or off street car parking bay designated for Blue Badge Holders, even if no general parking is provided*”. The Council consider that the provision of disabled parking would not render a development completely ‘car-free’, and that the definition of ‘car-limited’ is a clearer phrase as it relates to those residential and mixed used developments that include disabled parking but could also offer limited parking, below the maximum car parking standards set out within Policy 6.13 of the London Plan.

1.9 In line with Policy 6.13 of the London Plan, the Council aims to strike a balance between promoting new development and excessive car provision. Paragraph 6.42 acknowledges that *“London is a diverse city that requires a flexible approach to identifying appropriate levels of car parking across boundaries”*. CS Policy 14 only provides a limited criteria for assessment and DM Policy 29 supplements the existing CS policy by providing additional detail and further means of assessment. The application of all of the criteria outlined within DM Policy 29 will allow the Council to make an informed assessment about an appropriate level of provision, and in turn, adhere to Policy 14 of the Core Strategy, which seeks a managed and restrained approach to car parking.

1.10 The Council now proposes the following modifications. Text additions are **underlined in bold** and deletions are ~~struckthrough~~.

For clarification the Council suggest the inclusion of a definition within a new paragraph of the justification text as seen below:

2.228 Car-limited development refers to new development that provides limited parking, below the standards set out within Policy 6.13 of the London Plan (See Appendix 8)

~~2.228~~ **2.229** Where new development occurs close to areas where there are frequent public transport....

1.11 In making an assessment as to whether car-limited development is appropriate all of the criteria within Policy 29 2(a-g) will apply. The Council acknowledge that this emphasis could be clarified and propose to following alteration:

**DM Policy 29
Car Parking,**

1. The Council will require parking standards in accordance with the Core Strategy Policy 14.
2. Car limited major residential development will only be considered where there is:
 - a) PTAL of Good or higher, or where this can be achieved through investment in transport infrastructure and services,
 - b) No detrimental impact on the provision of on-street parking in the vicinity,
 - c) No negative impact on the safety and suitability of access and servicing,
 - d) Protection of required publically accessible or business use parking,
 - e) Inclusion of car clubs, car pooling schemes, cycle clubs and cycle parking and storage, as part of a package of measures mitigating the need for on-site parking provision,
 - f) An equitable split of parking provision between private and affordable

residential development, **and**

g) On-site accessible priority parking for disabled drivers.

3.

4.

2. The Policy states that *“The Council will require parking standards in accordance with the London Plan”*. In response to the Inspectors query the Council would like to clarify that point 29 (1) seeks to direct readers to Core Strategy Policy 14, which highlights that *“The car parking standards contained within the London Plan will used as a basis for assessment. “* However, the Council accepts that *“operate”* could be an appropriate alternative as this wording allows for a degree of flexibility when negotiating an appropriate level of parking provision for planning applications. This phrasing would also be consistent with DM29 (2) as described above.

The Council notes the Inspector’s comments regarding the suggested OMs to this policy and agree these would be appropriate.