

Public Examination of the Development Management Local Plan

London Borough of Lewisham response to the Inspector's agenda item 9 regarding DM12 Hotels

The Council suggests a modification to overcome a lack of clarity in part 2e of this policy. This removes the unclear/undefined phrase 'car free' and replaces it with a sentence explaining the limited types of parking to be provided for at hotel developments in areas of 'high public transport accessibility'. [I assume that this change is intended to replace the earlier SM11.]

However, this change introduces uncertainty about what is an area of 'high transport accessibility'. Should it more clearly correlate with any of the current PTAL descriptions? If so, how?

Planning Policy – February 2014

Council response

1. Introduction

- 1.1 The Council previously provided clarity to the wording of part (e) of policy DM12 Hotels in the paper entitled '[London Borough of Lewisham response on the Inspector's Question: DM12 Hotels](#)', dated 13 January 2014.

The original proposed submission version wording was as follows:

"e. provides an adequate level of car parking depending upon the location and the accessibility of the hotel, with lower levels of car parking expected within town centres and in areas where there is good public transport accessibility and a preference for car free development wherever possible"

The wording proposed in January 2014 was as follows:

"e. provides a level of car parking appropriate for the site's level of public transport accessibility. Parking provision for developments in areas of high public transport accessibility should be limited to disabled parking, coach parking, taxi parking and other parking required for operational need including deliveries and servicing"

- 1.2 The changes proposed in January 2014, and quoted above, were intended to replace the changes entitled 'SM11' which had been proposed at the submission stage.
- 1.3 The changes proposed in January 2014 were intended to clarify the policy, and to provide a clear, succinct and workable definition for the phrase "car free".

1.4 The Inspector has raised the issue of the lack of certainty regarding the definition of “areas of high public transport accessibility”. The Council accepts the uncertainty arises from the fact that the word “high” does not directly relate to any specific PTAL level.

2. Suggested modifications and justification

2.1 The Council proposes to address the Inspector’s concern by modifying the wording “areas of high public transport accessibility” proposed in January 2014 to “areas of good public transport accessibility (PTAL 4 and above)”.

2.2 The use of the word “good” corresponds with PTAL 4¹. The modification outlined above includes the addition of brackets containing the PTAL number referred to in the text, in order to increase the clarity of the policy.

2.3 The use of the word “good” follows the original wording of DM12 part (e) which referred to a preference for car free development and lower levels of car parking where there is “good public transport accessibility”.

2.4 The requirement for developments with PTALs of 4 and above to have parking limited to disabled parking, coach parking, taxi parking and other parking required for operational need including deliveries and servicing aligns with the approach taken by the Mayor of London for all hotel applications referred to the Mayor, as outlined in the supporting text found at paragraph 6A.8 “Parking for hotel and leisure uses”, in the Parking Addendum to Chapter 6 of the London Plan 2011 (p.206).

2.5 For clarity, the Council proposes the following modifications to the submitted version of part (e) of Policy DM 12. The proposed modification below replaces both SM11 and the modification proposed in January 2014. Text additions are **underlined in bold** and deletions are struckthrough:

DM Policy 12 (e)

~~e. provides an adequate level of car parking depending upon the location and the accessibility of the hotel, with lower levels of car parking expected within town centres and in areas where there is good public transport accessibility and a preference for car free development wherever possible.~~

provides a level of car parking appropriate for the site’s level of public transport accessibility. Parking provision for developments in areas of good public transport accessibility (PTAL 4 and above) should be limited to disabled parking, coach parking, taxi parking and other parking required for operational need including deliveries and servicing.

¹ Transport for London document Measuring Public Transport Accessibility Levels: PTALs: Summary (April 2010), <http://data.london.gov.uk/documents/PTAL-methodology.pdf>