

## Public Examination of the Development Management Local Plan

### London Borough of Lewisham response to the Inspector's agenda item 15 regarding DM29: Car Parking

*The Council suggests clarifying the policy by indicating that all the criteria at part 2 need to be met and including a new paragraph of text which defines 'car-limited development'.*

*The Council also introduces other changes as follows:*

- 1. SM32 changes part 2a of the policy to read 'PTAL of good or higher' instead of 'PTAL level 4 or higher'. Which of these descriptions is the more appropriate (and best corresponds with the London Plan)?*
- 2. SM6-8 introduce new material bringing the London Plan parking standards into the DMLP. (To clarify what is meant by 'future provision' in relation to blue badge parking, as opposed to 'provision from the outset'. Is there any planning mechanism by which 'future provision' can be activated?)*

*As these are considerable cumulative changes to DM29, it may be best to treat them as a package of MMs. See Appendix A*

Planning Policy – February 2014

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#### Council response

1. In response to the first question raised by the inspector, SM32 was suggested in response to concerns raised by Barton Willmore (DMREP12) regarding the promotion of car-limited development in areas with a PTAL lower than 4. The Council therefore amended the Policy (SM32) in address the matters raised within the representation. Transport for London's, Assessment for Transport Best Practice Guidance 2010 includes a PTAL methodology, and highlights PTALs and their associated 'Very Poor' to 'Excellent' descriptions, with PTAL level 4 being considered 'good'. The Council however, seeks to maintain a managed and restrained approach to car parking, and in areas of high accessibility there is a desire to reduce the need for car parking and encourage use of public transport. The Council accepts the point made by the inspector regarding the use of PTAL within the London Plan, which uses the PTAL level 1-6b rather than the descriptive counterpart. The Council would accept the use of 'PTAL level 4' rather than 'good' if the inspector considers this description better for consistency and clarity.

- 1.1 The Council therefore suggest the following modifications. Text additions are **underlined in bold** and deletions are ~~struck through~~.

**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~~ **level 4** 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. Applications for the conversion of single dwellings into multiple dwellings will not be permitted to use front garden space for off-street parking
4. Wheelchair accessible car parking is required to be provided in accordance with best practice standards
5. All new developments will need to ensure that at least 20% of parking bays have an electric charging point installed
6. Schemes will provide appropriate levels of parking for motorcycles.

2. SM 6-8, sought to add to the existing DM Policy by introducing an additional appendix, with the London Plan standards specifically replicated. These standards are already referenced within the paragraph 2.227 of the justification text, which identifies London Plan Policy 6.13. The addition of the Table in the appendix does not therefore add new information, but was proposed to help aid the reader and provide clarity. Furthermore, the LDF preparation section of London Plan Policy 6.13 states that maximum standards set out in Table 6.2 in the Parking Addendum should be used to set standards. However, the Council acknowledge that SM 7 has only replicated the first Table from Table 6.2, which provides car parking standards for Blue Badge parking. Further standards for 'Parking for Retail', 'Parking for Employment Uses' and 'Parking

for Residential Development' should also have be included as they also form part of Table 6.2.

- 2.1 In response to the second question raised by the Inspector with regard to blue badge parking, the reference to 'provision from the outset' and 'future provision' is taken directly from page 204 of the London Plan. The Council's understanding of the term 'Future Provision' is also taken directly from the London Plan, which is explained as "enlarged standard spaces that can be adapted to be parking spaces designated for use by disabled people to reflect changes in the local population needs and allow for flexibility of provision in the future". The key issue is ensuring a percentage of adaptable standard spaces are included at the design and consent stage of a scheme. This would enable a land owner to adapt to the changing needs of the population, should there be a need for a greater number of blue badge parking in the future. Paragraph 6A.3 of the London Plan states that "the provision of bays should be regularly monitored and reviewed to ensure the level of provision is adequate" and in accordance with paragraph 6.44 of the London Plan, applicants should use their transport assessments and access statements to demonstrate how the needs of disabled people have been addressed.