

Issue 5: Transport Policies DM20 to DM22
Representor number: 635815

**Managing Development: Development Plan Document
Examination in Public**

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On behalf of
Canary Wharf Group

Managing Development: Development Plan Document

Position Statement

1.0 Background

Canary Wharf Group made representations the Tower Hamlets Managing Development – Development Plan Document (MDDPD) Policies DM20 to DM22.

Policy DM20 The policy is considered to be unsound as it fails to provide sufficient flexibility for new developments to provide for essential trips by car or taxi and makes no explicit reference to disabled parking.

Policy DM21 The policy is considered to be unsound as it suggests that priority should be given to the movement of freight and construction by rail or river and this fails to provide sufficient flexibility.

Policy DM22 This policy is considered to be unsound as it seeks to set unrealistically low parking standards.

Canary Wharf Group does not wish to make any further representations with regard to Policies DM20 and Policy DM21 and this statement is concerned wholly with Policy DM22.

Policy DM22 proposes significant reductions in parking standards compared with those in the adopted Interim Planning Guidance (IPG). Canary Wharf Group has made representations on the emerging policy to the effect that the proposed standards are unduly restrictive and could render office and residential developments unviable.

The reductions in proposed parking standards follow from a review carried out by the borough in 2011 and which purports to provide an evidence base for the emerging standards (Review of Car and Cycle Parking Standards, Tower Hamlets, 2011 [EB52]). The review starts from the premise that existing residential (C3) and office (B1) parking standards should be significantly reduced and fails to consider the impact of lesser reductions.

Canary Wharf Group maintains the position that the proposed standards are inappropriate and would ask the Inspector to recommend alternative standards for residential and commercial developments. This position statement considers the Council's basis for its proposed standards and presents alternative proposals for consideration.

It is considered that the proposed approach to parking standards is unsound as it is not justified.

2.0 DPD proposals

The DPD proposes zero parking for B1 office developments anywhere in the borough, which is a significant reduction on the current standard of 1 space per 1,250 m². The latter standard falls within the range suggested by the London Plan for central London. Canary Wharf accepts that the London Plan standard is applicable to Canary Wharf but does not support a further reduction.

The DPD also proposes significant reductions in residential parking standards in almost all cases and introduces standards based on traffic congestion and public transport accessibility. The current policy allows up to 0.5 spaces per unit with car free agreements, i.e. residents are not eligible for

on-street parking permits. The proposed standards are significantly below this level, as discussed below.

The DPD proposed parking standards for residential uses are summarised in Table 1 below.

TABLE 1 - PROPOSED RESIDENTIAL PARKING STANDARDS

Location	<3 bedroom units	3+ bedroom units
Clear Zone	0	0.1
Isle of Dogs	0	0.1
PTAL 5-6b	0	0.1
PTAL 3-4	0.2	0.3
PTAL 1-2	0.4	0.5

The Isle of Dogs has been identified as an area where new residential units should have zero parking, with the exception of 3+ bedroom units that should have a maximum of 0.1 spaces per unit.

Canary Wharf Group has proposed in its representations a standard of 0.25 spaces per unit for <3 bedroom units – this in itself is a 50% reduction on the existing standard and is less than the 0.3 spaces per unit average for consented developments in the Isle of Dogs shown in Table 2 of the Council’s 2011 review. It is proposed that the current standard of 0.5 spaces per unit for 3+ bedroom units should be retained.

3.0 Policy Consistency

The parking standards set out in the Managing Development DPD in Policy DM22 and Appendix 2 represent a radical departure from existing policies and established practice in Tower Hamlets and specifically the Isle of Dogs. Furthermore, they disregard the parking standards policies set out in the London Plan.

Specifically, the London Plan sets out maximum residential parking standards of 1 to 1.5 spaces per unit for 3 bedroom properties and less than 1 per unit for 1-2 bedroom properties. Although the London Plan also stresses that in areas of high public transport accessibility, developments should aim for significantly less than one space per unit, the DPD is significantly different with plans for a zero parking policy for properties with less than 3 bedrooms.

While the Council suggests that the London Plan provides a framework which individual authorities have the flexibility to set their own standards, the current proposals go too far and without clear justification.

4.0 Evidence Base

The parking standards proposed in the DPD follow the recommendations of the 2011 review referred to above [EB52]. The Isle of Dogs has been isolated in this review as an area with a ‘significant level of congestion’ (para. 2.10). This is an assertion that is not fully supported by the evidence presented in the review.

The review refers to a Marsh Wall East Masterplan carried out on behalf of the Council in 2011. This purports to show that at certain times of the days, Preston's Road roundabout would be at capacity in 2026. This is not compelling evidence in isolation for the following reasons:

- Preston's Road is one of only three entry/exit routes to/from the Isle of Dogs, Westferry Road and Upper Bank Street being the others, and no evidence is presented to the effect that alternative routes are similarly congested.
- The Council has undertaken studies to develop solutions to improve Preston's Road roundabout and, indeed, has already secured s106 contributions towards potential improvements.

It is self-evident that parts of the borough will, at certain times of the day, experience congestion but the Council has not presented any evidence to the effect that this warrants households being denied access to a car at all times.

The review also considers increases in traffic flows on roads in the borough to 2028, as presented in Map 2. The only analysis presented in the review on traffic growth is the statement that 'much of this growth is concentrated in the eastern part of the borough, where the majority of new development is expected' (para. 1.13). From this analysis the conclusion is drawn that 'additional vehicles would severely worsen traffic levels' (para. 1.14).

Clearly from Map 2 it is self-evident that the greatest increases in traffic are on the borough's busiest roads, the A12 and A13 corridors, but this does not in itself imply unacceptable levels of congestion. The A13/Aspen Way corridor, for example, is a high capacity route and no evidence is presented to suggest that traffic growth could not be accommodated.

Furthermore, Map 2 does not show significant growth on roads in the Isle of Dogs even though the analysis was carried out assuming future developments with levels of parking based on current standards. It cannot be implied from this analysis that the road network within and around the Isle of Dogs are incapable of accommodating traffic growth from new developments implied by existing parking standards.

5.0 Car Use and Car Ownership

Car ownership in London at 0.76 vehicles per household is generally lower than the national average of 1.15 vehicles per household and this reflects higher levels of public transport accessibility. It is also the case that, in London, cars are owned but not necessarily used with a high percentage of trips, especially to work, being carried out by other modes. Less than 10% of trips into central London in the morning peak period are by car and only 5% of Canary Wharf employees travel to work by car.

Clearly, in areas of inner London with excellent public transport links, the private car is not used for most journeys to work. By contrast, in outer London, some 65% of trips are made by private car.

Trips per person per day have steadily decreased amongst car owners in recent years, with the average car owner in inner London in high PTAL locations using their car once to twice a week or less.¹

¹ Residential parking provision in new developments, TfL, 2012

Car ownership is essentially a function of socio-economic status, lifestyle, family status and other demographic factors. In urban areas, such as London, a car is owned often for occasional recreational or weekend use rather than for journeys to work.

Recent research by the Berkeley Group has analysed data for different areas to assess car use in areas of low and high public transport accessibility.² Table 2 summarises peak hour vehicle trip rates for a number of developments located in areas with relatively low levels of public transport accessibility (defined as a PTAL of 3 or less). The data has been normalised to 100% car ownership per household and shows that car owning households make 0.21 vehicle trips on average in the peak hour.

TABLE 2 - CAR USE BY VEHICLE IN PEAK HOURS IN LOW PTAL AREAS

Site	PTAL	Car Ownership (%)	Vehicle Trip Rate (per unit)	Vehicle Trip Rate (per car)
Battersea Reach, Wandsworth	3	77%	0.095	0.12
Grosvenor Waterside, Westminster	2	66%	0.064	0.10
Imperial Wharf, Hammersmith & Fulham	3	55%	0.070	0.13
Kew Riverside Park, Richmond	1	58%	0.260	0.45
Riverside West, Wandsworth	3	51%	0.028	0.06
Stanley Close, Greenwich	3	68%	0.352	0.52
Kennington Park Square, Lambeth	3	11%	0.041	0.37
Beaux Arts, Islington	3	100%	0.074	0.07
New Providence Wharf, tower Hamlets	1	54%	0.047	0.09
The Hamptons, Sutton	1	150%	0.289	0.19
Average				0.21

Equivalent data for developments situated in areas of high public transport accessibility (defined as PTAL of 5 or more) is summarised in Table 3. It shows that car owning households only generate 0.09 vehicle trips in the peak hour, less than half the amount for households in low PTAL areas.

The conclusion of this analysis is that there is a clear correlation between car use for journeys to work and the availability of good public transport services.

² Does Car Ownership Increase Car Use, Berkeley Group

TABLE 3 - CAR USE BY VEHICLE IN PEAK HOURS IN HIGH PTAL AREAS

Site	PTAL	Car Ownership (%)	Vehicle Trip Rate (per unit)	Vehicle Trip Rate (per car)
St George Wharf, Lambeth	6	54	0.02	0.03
Wingate Square, Clapham	6	41	0.09	0.23
Kempton Court, Tower Hamlets	6	100	0.14	0.14
City Walk, Tower Hamlets	5	100	0.04	0.04
City Quarter, Tower Hamlets	6	37	0.03	0.08
Empire Square, Southwark	6	44	0.01	0.03
Average				0.09

The evidence on car ownership versus car use points firmly towards the conclusion that in areas with good public transport access, cars owned by households are used significantly less at peak times. Trip rates based on this research have been accepted by Transport for London.

6.0 Commercial Viability

There is clearly a demand for car parking spaces in new developments in central and inner London with spaces typically attracting payments of £35,000 and above for secure basement parking. The larger the unit for sale, the more difficult it becomes to sell a property without a car parking space and this is a function of both the demographic profile of purchasers and an expectation that larger units will be difficult to sell on without a parking space.

Developers need to have an adequate number of spaces to sell to purchasers who need access to a car otherwise this depresses overall values and reduces revenues from the sale of spaces. Where the overall viability of a development is reduced, this affects potential s106 contributions and could reduce the amount of affordable housing provided.

7.0 Benchmarking

The TfL research on residential car parking referred to above also summarises parking standards adopted or proposed by London boroughs – the results of this research are summarised in Annex 1.

Boroughs that could be considered comparable to Tower Hamlets clearly take a different approach to parking standards. Camden has a standard of 0.5 spaces per unit in areas of 'low parking provision', Islington has a blanket standard of 0.5 spaces per unit and Southwark has a standard of 0.4 spaces per unit in the Central Activities Zone. No other London borough, including the City and Westminster has adopted such restrictive parking standards.

The comparator boroughs considered also have to contend with traffic growth and all have isolated examples of congestion on some roads. However, in all cases a more flexible approach is taken.

8.0 Disabled Parking

Developers now seek to provide sufficient parking to enable all wheelchair accessible units to be allocated a space. The proposed parking standard of zero spaces for smaller units would preclude such provision. As a minimum, Lifetime Homes comprising 10% of total provision should have access to a parking space.

9.0 Parking Stress

Provision of off-street parking can reduce on-street parking stress and safeguard existing on-street parking capacity. This is not recognised by Policy DM22 and the overly restrictive zero parking standard. Any development should have a minimum level of parking in order to support essential needs, including parking for the disabled, those working unsocial hours or families with children. Each development should be considered on its merits and also take into consideration the availability of on-street parking. Specifically on the needs of some social groups, including disabled people, Policy DM20 and Appendix are too vague and fail to take into account the reality of people living in properties of less than three bedrooms.

10.0 Canary Wharf Planning Limit

The Canary Wharf Masterplan granted consent for the Estate to provide up to a ceiling of 6,500 off-street parking spaces. In practice, Canary Wharf has been removing spaces as demand from office tenants has fallen to 2,893 parking spaces in total. This represents a significant reduction on the consented level of parking and should provide flexibility for residential developments in and around the Estate to provide reasonable levels of parking consistent with market demand.

11.0 Cycle Parking

The proposed cycle parking standards are consistent with the adopted London Plan but do not provide sufficient flexibility for cycle parking to be accommodated in off-site facilities, such as within secure car parks. Canary Wharf feels that the policy should make explicit reference to off-site parking being acceptable.

The Greater London Authority (GLA) has subsequently proposed interim alterations to the London Plan, including making additional cycle parking available for visitors at a rate of 1 space per 40 dwellings. It is probable that the GLA will seek to implement this standard for referable applications, although this is an onerous imposition above the existing standards and requirements to contribute financially to cycle docking stations.

Canary Wharf remains of the view that DM22 should specifically make provision for off-site cycle parking to be allowable in meeting the cycle standards provided it is in secure facilities. The proposed London Plan alterations emphasise the need to consider alternatives for visitor cycle parking.

12.0 Conclusions

Canary Wharf takes the view that the parking standards proposed by the Council for the Isle of Dogs area are unsound as have not been properly justified. Our concerns can be summarised as follows:

- The proposed standards do not accord with the London Plan standards for residential or commercial development.

- The evidence on which the proposed standards is based is partial and does not support the contention that parking on the Isle of Dogs needs to be restricted to such a degree.
- The proposals fail to consider the relationship between car ownership and use and the evidence that in areas such as the Isle of Dogs cars are relatively little-used.
- Developers need to be able to offer car parking spaces in new developments to make them attractive and viable to purchasers.
- The proposed standards are significantly out of line with those adopted by other central and inner London boroughs.
- The failure to provide on-site parking could result in additional stress on on-street parking and public car parks.

For these reasons, Canary Wharf would ask the Inspector to recommend that its alternative proposals be adopted by the Council. While these are significantly higher than proposed by the Council, they do represent an overall reduction in provision. Finally, these higher standards are still maximum levels and any developers would need to demonstrate that consequent traffic levels could be satisfactorily accommodated and the Council's ability to mitigate impacts would be safeguarded.

13.0 Recommendations

Canary Wharf Group asks the Inspector to recommend that:

- The current B1 parking standard of 1 space per 1,250 m² of office floor area contained in the adopted IPG be retained.
- The current C3 parking standard of 0.5 spaces per residential unit be retained for properties with 3 bedrooms and above.
- The proposed parking standard for residential units with less than 3 bedrooms should be 0.25 spaces per unit.
- Policy DM22 should make explicit reference to cycle parking provided in secure off-site facilities being an acceptable alternative.

		Studio	1 bed	2 bed	3 bed	4 bed	5 bed
London Plan			1	1	1.5	2	2
Barnet			1	1.5	1.5	2	2
B&D			1	1	1.5	2	2
Bexley			1	1	1.5	2	2
Brent			1	1.2	1.6	2	2
Bromley	Market Housing - flats		1	1	1	1	1
	Market Housing - terraced houses/flats		1.5	1.5	1.5	1.5	1.5
	Market Housing - detached / linked houses		2	2	2	2	2
	Affordable		0.5	0.75	1	1	1
Camden	Low Parking Provision Areas		0.5	0.5	0.5	0.5	0.5
	Rest of borough		1	1	1	1	1
City of London			0.5	0.5	0.5	0.5	0.5
Croydon	Flats		1	1	1	1	1
	Houses & Flats		1.5	1.5	1.5	1.5	1.5
	Detached / Linked houses		2	2	2	2	2
Ealing			1	1	1	1	1
Enfield			1	1	1.5	2	2
Greenwich				1	1	1	1
Hackney			-	-	-	-	-
H&F			1	1	1.5	2	2
Haringey	Detached/Semi detached houses		1.5	1.5	1.5	1.5	1.5
	Terraced houses and flats (2 bedrooms or more)		-	1	1	1	1
	Flats/bedsits (1 bedroom)		0.33	-	-	-	-
Harrow			1	1	1	1	1
Havering	Flats		1	1	1	1	1
	Terraced houses/flats		1.5	1.5	1.5	1.5	1.5
	Detached, semi and terraced houses		1	1	1	1	1
Hillingdon	Detached/Semi detached houses		2	2	2	2	2
	Terraced houses and flats		1.5	1.5	1.5	1.5	1.5
Hounslow	For general residential	0.5 max	1.1	1.1	2	2	2
	For affordable residential	0.5 max	0.7	0.7	1.1	1.1	2
Islington			0.5	0.5	0.5	0.5	0.5
K&C	Affordable flats		0.66	0.66	0.66	0.66	0.66
	Affordable houses		1	1	1	1	1
	Converted flats		1	1	1	1	1
	Purpose built flats (up to 5 hab rooms)		1	1	1	1	1
	Purpose built flats (5+ hab rooms)		-	-	-	-	1.5
	Single family dwellings (up to 5hr +): minimum		1+	1+	1+	1+	1+
	Single family dwellings (5+ hab rooms): preferable		-	-	-	-	2
KuT			1	1	1.5	2	2
Lambeth			1	1	1.5	2	2
Lewisham			1	1	1.5	2	2
Merton			1	1	1.5	2	2
Newham			1	1	1.5	2	2
Redbridge			1	1	1.5	2	2
RuT			1	1	2	2	2
Southwark	CAZ (highest PTAL)		0.4	0.4	0.4	0.4	0.4
	High PTAL		1	1	1	1	1
	Med PTAL		1	1	1	1	1
	Low PTAL		1.5	1.5	1.5	1.5	1.5
	Suburban (lowest PTAL)		2	2	2	2	2
Sutton	No allocated spaces		1	1	1	-	-
	1 allocated space per unit		1	1	1.5	-	-
	Up to 2 allocated spaces per unit		-	-	1.5	2	2
Tower Hamlets	Clear Zone		0	0	0.1	0.1	0.1
	isle of Dogs		0	0	0.1	0.1	0.1
	PTAL 5-6		0	0	0.1	0.1	0.1
	PTAL 3-4		0.2	0.2	0.3	0.3	0.3
	PTAL 1-2		0.4	0.4	0.5	0.5	0.5
Waltham Forest	Low PTAL no CPZ		1	1	1.2	1.2	1.2
	Low PTAL in CPZ		0.75	0.75	1	1	1
	Med PTAL in CPZ		0.6	0.6	1	1	1
	Med PTAL in CPZ		0.4	0.4	0.75	0.75	0.75
	High PTAL no CPZ		0.3	0.3	0.75	0.75	0.75
	High PTAL in CPZ		0.25	0.25	0.5	0.5	0.5
Wandsworth			1	1	1.5	2	2
Westminster			Min 0.5 Max 1		Min 0.75 Max 1.5		