

**POSITION STATEMENT OF
KEITH SOWERBY ON BEHALF
OF COMMERCIAL ESTATES
GROUP**

Representor Number: 635838

In respect of Policy DM22

**London Borough of Tower Hamlets
Managing Development DPD
Local Development Framework**

EIP Response - Parking

Keith Sowerby

- i) I am a Director of Steer Davies Gleave, responsible for major residential, commercial and infrastructure projects. I hold a BSc degree in Economics from the London School of Economics and I am a fellow of the Institution of Highways and Transportation.
 - ii) I have over 39 years' experience as a transport planner, during which time I have been responsible for the planning, appraisal and design of a wide range of development projects including residential, commercial and mixed use schemes, transport infrastructure projects, including major highways, rail, airport access, bus and traffic schemes.
 - iii) My curriculum vitae is included in Appendix B.
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Introduction

1. The Tower Hamlets Managing Development - Development Plan Document (MDDPD) proposes a significant reduction to the maximum parking standard compared with the adopted Interim Planning Guidance in the Core Strategy and Development Control Plan (Core Strategy) from 0.5¹ to 0 or 0.1² spaces per unit based on size for the Isle of Dogs area.
2. Commercial Estates Group (CEG), the managing agent for the owner of Hertsmere House, made representations on the emerging policy in March 2012 stating that the policy does not strike an appropriate balance as advocated in the London Plan (2011)³ and requires, rather than promotes, car free development (representation numbers 443 and 444⁴).
3. This inconsistency with policy and the quality of the evidence base are of concern to CEG and form the basis of this evidence.
4. It is the view of CEG that parking provision is crucial to securing the right type of development, in the right place at the right time. If parking standards are too restrictive this will have a direct impact upon the type of development delivered.
5. CEG seeks that the MDDPD policies are revised to:
 - be consistent with the Core Strategy; and
 - be applied with consideration to the attributes of each site and proposed development.

Soundness

6. Section 20 of part 2 of the Planning and Compulsory Act 2004 requires development plan documents (DPDs) to go to independent examination. Section 20(5)(b) further requires that the DPD is examined to establish whether or not it is sound.
7. The parking standards set out in Policy DM22 and Appendix 2 of the MDDPD are unsound as they do not as they do not satisfy the "Justified" criteria set out in the National Planning Policy Framework (NPPF) requiring that standards represent the most appropriate strategy, when considered against reasonable alternatives, and are based on appropriate evidence.⁵

¹ London Borough of Tower Hamlets (2007) Interim Planning Guidance - Core Strategy and Development Control. Table PS7 (Page 279).

² MD1 - Tower Hamlets (2012) Managing Development - Development Management Plan. Policy DM22 & Appendix 2.

³ Mayor of London (2011) The London Plan - Spatial Development Strategy for Greater London.

⁴ MD5 - Tower Hamlets (2012) Managing Development - Development Plan, Representations and Responses.

⁵ Communities and Local Government (2011) National Planning Policy Framework. Paragraph 182.

Considerations

National and Regional Policy

8. The proposed parking standards included in the MDDPD represent a major departure from the existing national, regional and local policy.
9. The NPPF and the London Plan (2011) both support growth and highlight the importance of considering the attributes of the development when setting and applying parking standards.
10. The NPPF states that⁶ when setting local parking standards, local planning authorities should consider:
 - the accessibility of the development;
 - the type, mix and use of the 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.
11. It is also noted that⁷ local authorities should seek to improve the quality of parking in town centres⁸ so that it is convenient, safe and secure.
12. In the London Plan (2011) the Mayor seeks an appropriate balance to be struck between the promotion of new development and the prevention of excessive car parking provision that can undermine cycling, walking and public transport use⁹.
13. The London Plan (2011) provides a reasonable range of standards which can be applied with recognition of local conditions. These standards are shown in Table 1 below (and have been compared with the proposed MDDPD and adopted Core Strategy standards).
14. The London Borough of Tower Hamlets' Core Strategy highlights the importance of minimising parking and promoting sustainable transport options¹⁰. This is complemented by restrictive parking standards and the need to justify parking provision for each development. These standards provide a sensible, low limit which can be applied intelligently to specific sites.
15. As shown in Table 1, the proposed MDDPD parking standards are at odds with both the adopted Core Strategy and the London Plan (2011) standards.

⁶ Communities and Local Government (2011) National Planning Policy Framework. Paragraph 39.

⁷ Communities and Local Government (2011) National Planning Policy Framework. Paragraph 40.

⁸ Canary Wharf is designated as a Major Centre in Map 2.6 of the London Plan, page 64.

⁹ Mayor of London (2011) The London Plan - Spatial Development Strategy for Greater London. Policy 6.13, page 200.

¹⁰ London Borough of Tower Hamlets (2007) Interim Planning Guidance - Core Strategy and Development Control. Page 181.

TABLE 1 ADOPTED AND PROPOSED PARKING STANDARDS FOR THE ISLE OF DOGS

Size of Residential Units	Maximum Parking Standards		
	Adopted Core Strategy ¹¹	Proposed MDDPD ¹²	London Plan ¹³
C3 Residential 1 or 2 bedroom units	Car free housing up to 0.5 per 1 dwelling unit	0 spaces per unit	<1 space per unit
C3 Residential 3 bedroom units		0.1 spaces per unit	1-1.5 spaces per unit
C3 Residential 3 bedroom units			1.5-2 spaces per unit

16. Similarly, the proposed MDDPD places unreasonable restrictions on the provision of car parking for office land use. Table 2 provides a summary of the proposed standard.

TABLE 2 ADOPTED AND PROPOSED PARKING STANDARDS FOR THE ISLE OF DOGS

Size of Residential Units	Maximum Parking Standards		
	Adopted Core Strategy ¹⁴	Proposed MDDPD ¹⁵	London Plan ¹⁶
B1 Office (over 1,000 sqm)	1/1250 sqm	0 - No parking	1/600-1000 sqm in Inner London

SQM - Square metres (of Gross Floor Area)

¹¹ London Borough of Tower Hamlets (2007) Interim Planning Guidance - Core Strategy and Development Control. Table PS7, page 279.

¹² MD1 - Tower Hamlets (2012) Managing Development - Development Management Plan. Policy DM22 & Appendix 2.

¹³ Mayor of London (2011) The London Plan - Spatial Development Strategy for Greater London. Page 205.

¹⁴ London Borough of Tower Hamlets (2007) Interim Planning Guidance - Core Strategy and Development Control. Table PS7, page 279.

¹⁵ MD1 - Tower Hamlets (2012) Managing Development - Development Management Plan. Policy DM22 & Appendix 2.

¹⁶ Mayor of London (2011) The London Plan - Spatial Development Strategy for Greater London. Page 205.

Benchmarking against other Boroughs

17. A comparison of existing parking standards in London highlights the MDDPD standards to be comparatively unreasonable. A table of standards is provided in Transport for London's Residential Parking Provision in New Developments report¹⁷ and shows that the proposed policies are extreme when compared to all other boroughs, including those in Inner and Central London. For ease of reference this table is reproduced in Appendix A.
18. It is the view of CEG that overly restrictive standards will make it more difficult for the London Borough of Tower Hamlets to attract new development and will affect the viability of those developments that are in the pipeline.

Property Values and Viability

19. Residential development at the high end of the market is unviable without suitable parking provision as it is seen as essential for at least 30% of residents, primarily for leisure outside peak hours rather than commuting trips within the peak period. Car ownership is higher amongst higher earners, meaning those that would expectedly purchase properties in any future development on Hertsmere House site would be deterred by a shortage of parking provision, as proposed in the current MDDPD.
20. The restriction, or exclusion, of parking provision elongates the sales process by alienating a potential section of potential purchasers. The resulting cash-flow implications of the longer sales/development program (particularly for a single phase high rise building), and increased sales 'risk', will have an impact on the viability of the project and the ability of the developer to bear other costs, such as affordable housing tariffs.

Evidence Base

21. The standards proposed in the MDDPD are based on the Review of Car and Cycle Parking Standards¹⁸ paper and the London Borough of Tower Hamlet's Transport Planning Strategy¹⁹, however, this evidence has been selectively interpreted and does not include all of the important considerations.
22. In particular, the conclusions drawn on traffic congestion are not robust and the relationship between car ownership and use is not explored. These issues are discussed in the following two sections.

Traffic Congestion

23. The evidence for the standards includes traffic studies undertaken as part of the Tower Hamlets Transport Planning Strategy and the Marsh Wall East Masterplan.
24. The traffic review for the Tower Hamlets Transport Strategy was based on Transport for London's sub regional transport model for east London. As detailed in the Review of Car and Cycle Standards document, this indicates that a 50% increase in vehicle trips is

¹⁷ Transport for London (2012) Residential Parking Provision in New Developments. Annex 1.

¹⁸ EB55 - London Borough of Tower Hamlets (2011) Review of Car and Cycle Parking Standards.

¹⁹ EB72 - London Borough of Tower Hamlets (2011) Transport Planning Strategy 2011-2031

expected over the next 15 years across the borough, however, the maps illustrating high levels of traffic today and high levels of future growth do not indicate that there is an issue on the Isle of Dogs²⁰. The maps do highlight high levels of traffic on the main (high capacity) arterial routes through the borough and future growth on these corridors.

25. The traffic review for the Marsh Wall East Masterplan identified capacity at Preston's Road roundabout as a key concern. However, this junction is only one element of the Isle of Dogs network and does not therefore indicate significant congestion across the area. In addition, it is understood that the Council are already pursuing a capacity scheme at this junction.
26. The conclusion of the modelling inputs to the review is simplistic: "Additional vehicles would severely worsen traffic levels in the borough and spread traffic onto the borough's local roads"²¹. This gives no consideration to where and why growth in traffic is forecast.

Car Ownership and Car Use

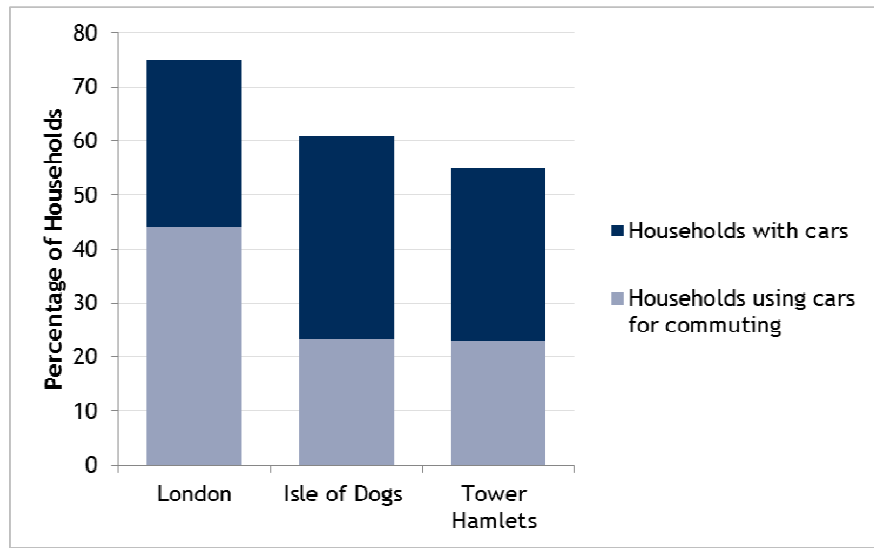
27. The complexities of the relationship between car ownership and car use are not considered in the evidence. This relationship is not direct, particularly in areas with good public transport provision.
28. According to census data the proportion of households with a car and those with a commuter who drives varies considerably across London. As shown in Figure 1²², although the number of households with a car is higher on the Isle of Dogs than in Tower Hamlets as a whole, the proportion of all households who include someone who drives to work is comparable.

²⁰ **EB55** - London Borough of Tower Hamlets (2011) Review of Car and Cycle Parking Standards. Maps 1 and 2, pages 4 and 5.

²¹ **EB55** -London Borough of Tower Hamlets (2011) Review of Car and Cycle Parking Standards. Paragraph 1.14, page 5.

²² Office of National Statistics (2001) Census.

FIGURE 1 CAR OWNERSHIP AND CAR USE FOR COMMUTING



29. Recent research conducted by the Berkeley Group indicates that there is no relationship between car ownership and peak hour car use. The research used survey data from recent developments. For example, at St. George Wharf in Lambeth, only 1 in every 32 residents' cars is used during the peak hour²³.
30. The study indicates that "residential traffic is not sensitive to car ownership or parking levels. Whilst many residents wish to own a car, they do not use one for peak hour travel and overall use throughout the day remains low. Therefore, the application of car parking policies within the London Plan (2011) should allow parking provision to be agreed at a level which supports the viability of new developments, alongside the delivery of sustainable transport initiatives."²⁴
31. The report presents details of car ownership and peak hour trip rates for 18 completed and occupied Berkeley Group developments. Four of the sites have a high PTAL and the survey results for these sites are presented in Table 3.

²³ WSP on behalf of the Berkeley Group (2011) Does car ownership increase car use? A study of the use of car parking within residential schemes in London. Page 5.

²⁴ WSP on behalf of the Berkeley Group (2011) Does car ownership increase car use? A study of the use of car parking within residential schemes in London. Page 5.

TABLE 3 CAR USE / CAR OWNERSHIP RATIOS - HIGH PTAL²⁵

Site	PTAL	Car Ownership	Max. Peak Car Driver Trip Rate (per Unit)	Max. Trip Rate/Car Ownership
St George Wharf, Lambeth	6	54%	0.017	0.03
Wingate Square, Clapham	6	41%	0.094	0.23
Kempton Court, Tower Hamlets	6	100%	0.138	0.14
City Walk, Tower Hamlets	5	100%	0.036	0.04
Average				0.11

32. Table 2 shows that the average car use/car ownership ratio in the peak hour at the six high PTAL developments presented above was 0.11. This represents an average of one car in 9 being used during the peak hour.
33. The Berkeley Group Report also included surveys for sites with low PTAL. The results of ten sites are presented below, each with a PTAL of 3 or lower.
34. Table 4 shows that the average car use/car ownership ratio in the peak hour at the ten developments with a low PTAL was 0.21. This represents an average of one car in 5 being used during the peak hour, which is almost double the rate for the high PTAL sites presented in Table 3.

²⁵ WSP on behalf of the Berkeley Group (2011) Does car ownership increase car use? A study of the use of car parking within residential schemes in London. Sections 4.2 and 4.4.

TABLE 4 CAR USE / CAR OWNERSHIP RATIOS - LOW PTAL²⁶

Site	PTAL	Car Ownership	Max. Peak Car Driver Trip Rate (per Unit)	Max. Trip Rate/Car Ownership
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

Essential Car Use

35. Although typically public transport accessibility is good in Inner London there are still journeys for which the private car is the only viable option. For example, car use can be essential for families, carers, and workers in some sectors.
36. Similarly, some car use can improve standards of living, for example by providing access to or options for shopping, recreation, holidays or visiting friends and family.
37. In line with this the London Borough of Tower Hamlets’ Review of Car and Cycle Parking Standards highlights “the need of some families, from across all housing tenures, to have access to a private vehicle”²⁷, however, this is barely recognised in the proposed standards.
38. A lack of parking can have a social impact on many different people and could also support a skew in local demographics both in terms of household size and socio-

²⁶ WSP on behalf of the Berkeley Group (2011) Does car ownership increase car use? A study of the use of car parking within residential schemes in London. Sections 4.2 and 4.4.

²⁷ **EB55** - London Borough of Tower Hamlets (2011) Review of Car and Cycle Parking Standards. Paragraph 1.19.

demographic characteristics. Further, parking restrictions could potentially drive up the value of existing parking on the Isle of Dogs and disadvantage or displace existing residents.

Conclusion

39. For the reasons set out above, it is the view of CEG that the proposed parking standards as set out in the MDDPD are unsound on the basis that they are unjustified when considered against reasonable alternatives and lack an appropriate evidence base. Furthermore, they are inadequate to support growth and are inappropriately designed.
 40. CEG propose that Policy DM22 and Appendix 2 are revised to:
 - be consistent with the Core Strategy; and
 - be applied with consideration to the attributes of each site and proposed development.
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Appendix A

		Studio	1 bed	2 bed	3 bed	4 bed	5 bed
London Plan			1	2	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		1.1	1.1	2	2	2
	For affordable residential		0.5 max	0.7	0.7	1.1	1.1
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		

Appendix B

Keith Sowerby

Director



I am a transport economist and planner with over 30 years' experience across all areas of transport in the public and private sectors. My current responsibilities involve directing a number of teams across a wide and diverse range of projects. I work closely with a number of major long-term private sector clients providing advice and support on a day-to-day basis as well as public sector clients. My experience in transport covers appraisal, modelling, research, environment and development planning.

Background

Qualifications
BSc Economics, London
School of Economics

Years of Experience
39 consultancy

Keith is a Director of Steer Davies Gleave who has been in transport consultancy since 1972. Prior to joining SDG, he was with JMP Consultants for over 30 years where he was Divisional Director responsible for transport planning in the London (West End) office. He has directed and managed a wide range of transport planning and research projects, including the preparation of transport strategies and policies.

Relevant Skills

Development Planning & Assessment Keith has wide knowledge of development planning. He has been responsible for projects covering most types of land use. He works closely with private sector clients on development projects and has extensive experience in the planning of major offices, housing, retail, hospitals and other land uses. Keith has a wide range of skills and knowledge of tools for the evaluation of developments, including traffic models and junction evaluation software.

Transport Interchange Planning Keith has extensive experience in the planning and appraisal of major station and interchange projects. His wide knowledge and understanding of public transport operations and assessment include the use of evaluation tools such as LEGION as well as demand forecasting and infrastructure design.

Transport Modelling & Appraisal Keith is experienced in all areas of transport modelling and appraisal, and is familiar with most major software packages. He has developed models for a number of major projects.

Transport Research Keith has been involved in many research projects including subjects as diverse as: road pricing, traffic signals, accidents, traffic nuisance, bus priority and monetary valuation of environmental impacts. He recently directed a project to develop best practice guidance for transport assessments in London.

Public Inquiries & Expert Evidence Keith is experienced in writing and presenting evidence at all types of public inquiry. His expertise has been required in a diverse range of planning, compulsory purchase, line order, select committee and other types of hearing. He has given evidence on transport issues and appeared as an expert witness on environmental issues.