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## Bromley Local Plan EiP - TfL Submission

### Issue 9: Are the policies relating to sustainable transport and parking justified, consistent with national policy and will they be effective?

*36) Does the Plan adequately address the impact of the development it proposes on vehicular transport? How does the Infrastructure Delivery Plan relate to the transport infrastructure necessary to serve the development put forward in the Plan?*

36) TfL welcomes the amendment to text after policy 31 that clarifies the requirements for Transport Assessments, Travel Plans, Delivery and Servicing Plans and Construction Logistics Plans to be developed in line with TfL guidance. As correctly noted in the IDP schedule, London Trams extensions to Bromley town centre and Crystal Palace and a DLR extension to Bromley town centre do not form part of TfL's current Business Plan, nor are they included as specific schemes in the Mayor's Transport Strategy. TfL welcomes inclusion of the Bakerloo Line Extension beyond Lewisham as a long-term project which will help to support development along the route.

*37) Explain how the parking policies adopted conform to those set out in the London Plan, including minimum standards.*

37) The setting of local parking standards including a minimum level of provision in PTALs 0 – 1 and some parts of PTAL 2 which have particularly poor public transport access is consistent with policy 6.13 of the adopted London Plan. However the adoption of minimum parking standards across the whole of PTALs 2 – 6 is not in conformity and is likely to lead to an over provision of car parking in areas with moderate, good or excellent public transport access, contrary to the objectives of the London Plan. TfL requests that the minimum threshold is removed from PTALs 2 – 6 for all size of dwellings retaining only a maximum, consistent with the London Plan to ensure that the policy and associated standards are in conformity. Although the objection relates to conformity with the London Plan, the draft Mayor's Transport Strategy sets out the principles for car parking in new developments and the new policy context. This is to ensure that Mayoral objectives relating to Healthy Streets, air quality and congestion can be realised and further evidence on this issue is provided below.

*38) Which are the most appropriate routes to safeguard in the Plan for extensions to the public transport system. What are the delivery dates for these extensions?*

38) Although TfL does not object to the proposed safeguarding of land and route alignment for a Docklands Light Railway extension from Catford to Bromley South via Bromley North; and London Trams from Beckenham Junction to Crystal Palace, neither of these projects form part of the current TfL Business Plan and they are not referred to specifically in the draft Mayor's Transport Strategy. By contrast the Bakerloo Line Extension to Lewisham and beyond is a major project outlined in the Mayor's Transport Strategy. Although the timescale for a potential extension beyond Lewisham is beyond the Local Plan period (2030), it would be appropriate to safeguard land and the route alignment where required.

## Car parking evidence

<b>Bromley Parking Policy</b>			
<b>PTAL</b>	<b>1-2 bed</b>	<b>3 bed</b>	<b>4+ bed</b>
0-2*	Minimum of 1	Minimum of 1.5	Minimum of 2
2*-6a	0.7 (min) – 1 (max)	1 (min) - 1.5 (max)	1.5 (min) – 2 (max)

Parking for all other types of development is to be provided at levels set out in London Plan Table 6.2.

### Overall London Plan compliance

The standards within the London Plan (Table 6.2) have been developed so as to be reflective of the characteristics of Outer London and allow some limited flexibility at the lowest PTALs. Therefore the Local Plan is considered acceptable in the context of the standards for PTAL 0 - 1, as this reflects advice in 6.42i and table 6.2 of the London Plan. However, any extension of minimum standards to PTAL 2 should take account of and make explicit reference to guidance in 6.42j and 6.42k of the London Plan.

TfL has particular concerns about the adoption of lower limits or minima for PTALs 2 – 6 in the Local Plan. This would not be in conformity with the London Plan which only sets maximum standards with no lower limit. Maximum standards still give flexibility in their application on a case by case basis. Deleting the lower limits in the table and adding guidance around the need to limit parking and encourage car free developments in the most accessible areas, e.g. town centres, will ensure compliance.

If Bromley's parking standards were altered by bringing them into line with the London Plan this could represent a reduction in the number of cars added to the road network. This could yield substantial benefits in terms of congestion, air quality and health outcomes as well as freeing up space that could be utilised for other purposes.

As stated in previous correspondence, TfL does not have a threshold for car club provision, and therefore this reference should be removed. Car clubs will not be suitable in all areas but they can provide a substitute for private car ownership and so an alternative caveat could be added 'where they are likely to be viable and have the potential to facilitate lower levels of car use and ownership'

As a result TfL considers the current approach to car parking as noted in draft policy 30 not to comply with London Plan policy 6.13. However the following changes should be made which would make it comply,

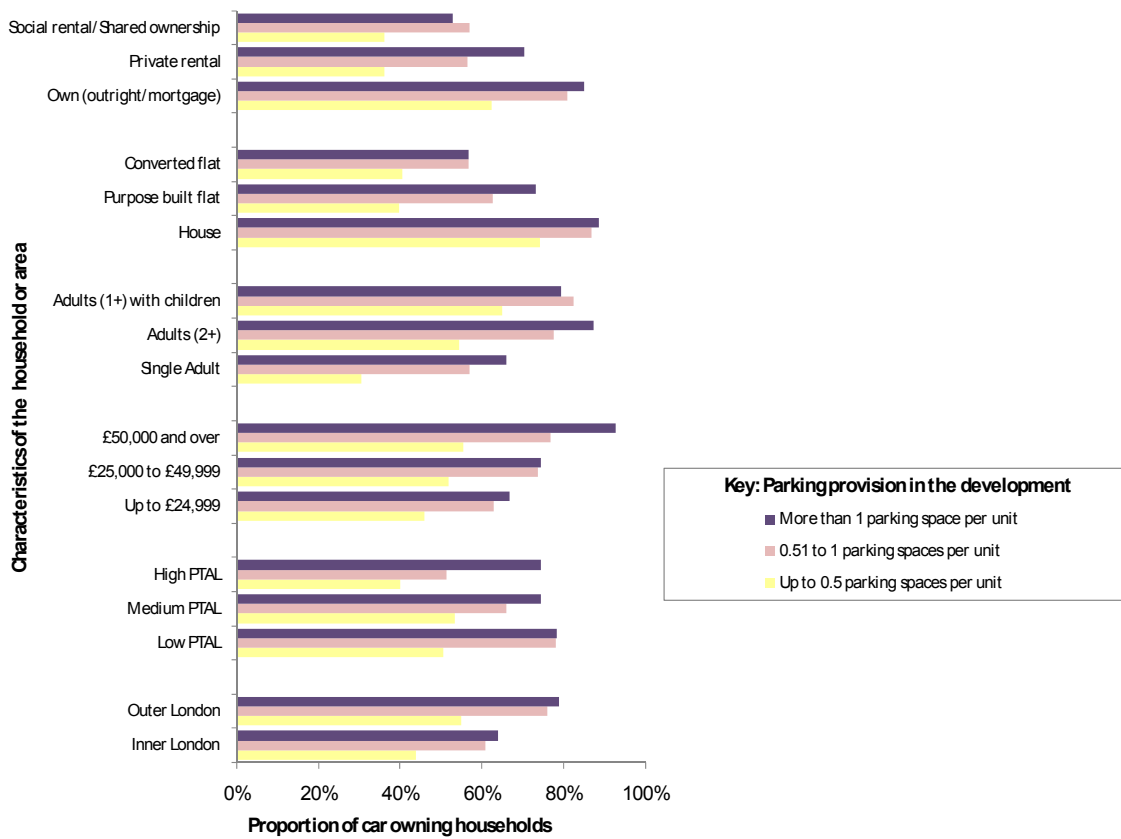
- Suggested rewording Policy 30 and associated table to remove reference to minimum requirement PTAL 2-6a for 1-2 beds, 3 beds and following proposed modification 4 beds,
- If a more flexible approach is proposed for parts of PTAL 2, criteria should be set out in the Local Plan for when this could be applied with reference to London Plan 6.42j and 6.42k,
- Remove reference to a minimum TfL car club threshold

TfL has carried out research into the relationships between parking provision, car ownership and car use and has access to data, specific to Bromley which is more detailed and up to date than the 2011 Census which should be taken into account when setting parking standards. This is set out in the following section:

### Introduction

Research has shown that car use in London is closely related to car ownership and that the amount of parking provided in new developments has a strong influence on car ownership consistently across a wide variety of other factors:

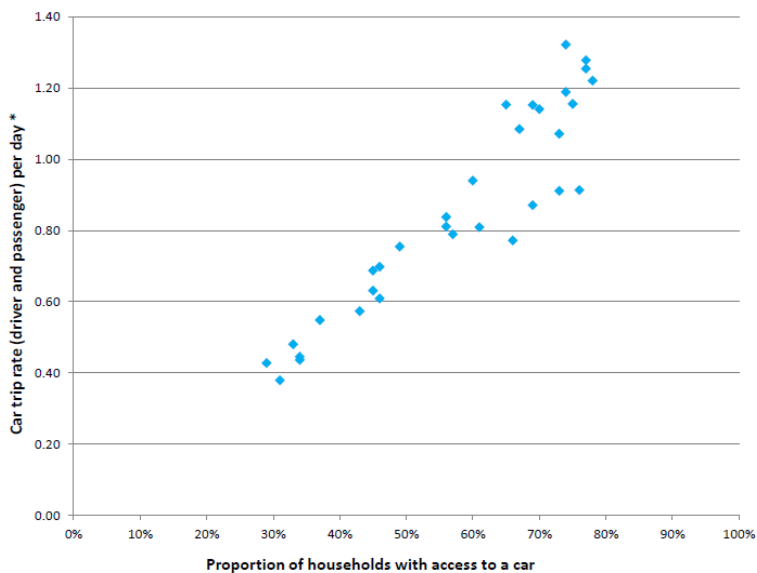
## Car ownership by parking provision and other key factors, residents of new development, 2012



Source: Residential Parking Provision in New Developments (TfL 2012)

The likelihood of owning and using a car is related to parking provision, so that housing with more parking generates more car use than other housing in the same area.

## Relationship between household car ownership and average car trip rate by borough, 2013/14



\*based on the average daily trip rate over a seven-day week

Source: London Travel Demand Survey, 2013/14

Limiting parking in new developments is therefore an important consideration in addressing issues of traffic congestion, air quality, and quality of place which are adversely affected by increased car use. This area of research is being developed further in connection with the ongoing review of the London Plan.

**Car ownership**

The latest average data from the London Travel Demand Survey (LTDS) over the three year period 2013/14 – 2015/16 shows that 23.2% of households within Bromley had no car, 50.7% had 1 car and 26.1% had 2+ cars. Although there have been fluctuations, these figures have remained relatively stable over the last few years with a reduction in households without a car being balanced by a reduction in households with 2+ cars. Overall car ownership is high in comparison with the London average although some comparable outer London boroughs including Kingston and Hillingdon record higher levels of overall car ownership.

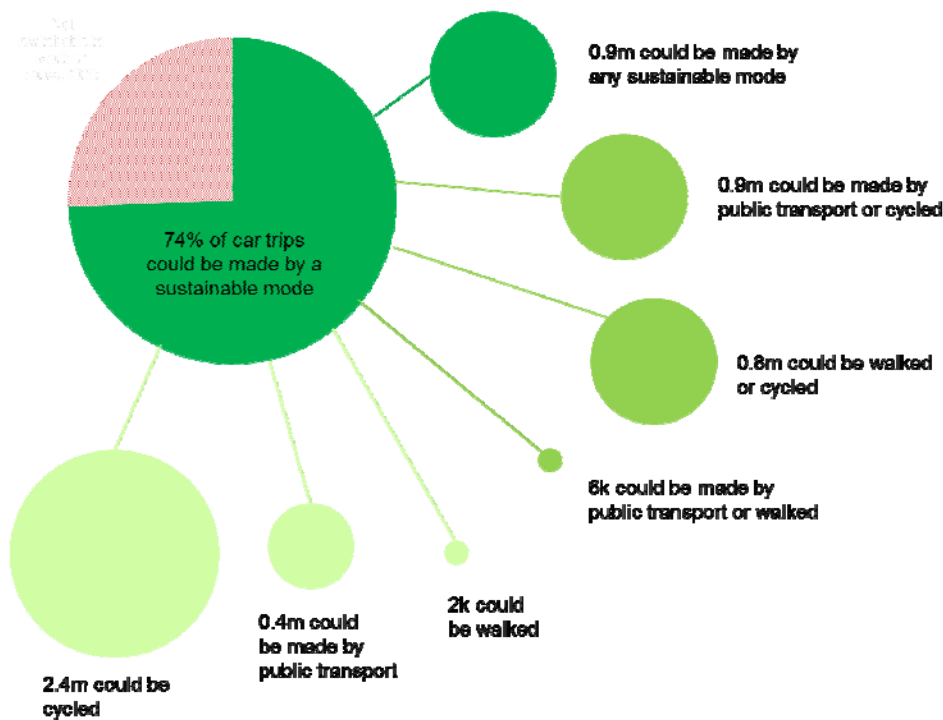
**Car use**

The latest average data from LTDS for the three year period 2013/14 – 2015/16 shows that 53.6% of trips within London undertaken by Bromley residents are as a car driver or passenger. Despite fluctuations this figure has remained relatively stable over the last few years and although relatively high, it is lower than a number of comparable outer London boroughs such as Bexley, Havering and Hillingdon.

**Car alternatives**

Survey and research evidence shows that car use is not essential for many trips. Three quarters of all existing car trips could be made by walking, cycling or public transport, based on the known characteristics of the trip and trip maker:

**Potential for existing car journeys to be made by a sustainable mode**



Source: Draft Mayor's Transport Strategy challenges and opportunities report (2017)

Those making trips that can only be easily made by car are not spread uniformly across London: two thirds live in outer London in areas of PTAL 0, 1 or 2. Most drivers living in better connected areas of outer London do not make a non-switchable car trip on a typical day. Many car journeys in outer London are made over short distances and 93% for car trips below 2km have a more sustainable alternative. Walking is particularly important in outer London accounting for 54% of trips from 500m to 1km and 88%

of trips under 500 metres, while in the better connected areas of outer London, the average walk times to the nearest school, GPs or town centre are less than 10 minutes.

### **Town centres**

Connectivity data also shows that proximity to a town centre has a significant effect on car use. On average only 35% of home based trips are by car for households living within 0.5 -1 km of a town centre, falling to 13% for those within 0.5 km. This compares with an average of over 40% of trips by car for those beyond 1km of a town centre. The data suggests that there is much greater potential for low car development in areas close to or within town centres. Based on London Travel Demand Survey (LTDS) data, car use for trips in the two largest town centres is 43% in Bromley and 54% in Orpington.

### **Parking ratios**

Using information from the London Development Database, developments granted planning permission in Bromley from 2010 to 2015 included an average of 1.11 parking spaces per residential unit compared to an outer London average of 0.74 per unit. This is the third highest ratio amongst the London boroughs and it has resulted in a total of 2,487 parking spaces over the five year period. This has added substantial pressure to the local road network. Looking ahead London Plan housing projections assume that there will be 10,300 new homes in Bromley by 2031. If these have similar parking provision to the developments approved in Bromley over the last five years this could generate 11,433 new cars, adding further pressures. By imposing minimum standards for new developments in higher PTAL areas as proposed in the draft Local Plan, there could be an even higher number of new cars on the local road network. If Bromley's parking standards were altered by bringing them into line with the London Plan this could represent a reduction in the number of cars added to the road network. This could yield substantial benefits in terms of congestion and health outcomes as well as freeing up space that could be utilised for other purposes.

### **Traffic data**

Latest traffic forecasts for Bromley from TfL's Area Models suggests that within the borough there will be substantial increases in both travel distance and travel time by 2031 with a fall in average speed in the morning peak from 23.6 km/hour in 2012 to 21.4 km/hour in 2031 and an increase in the delay rate from 0.9 min/km in 2012 to 1.1 min/km in 2031. The Area Models assume that there will be a continuing reduction in car travel and mode shift towards active travel so the increases in travel distance and travel time represent a conservative estimate which could be exceeded if expectations for mode shift are not achieved. Even with these assumptions the outcomes look challenging, but if they were not met the outcomes would be even worse.

### **Implementation of parking standards**

There are also issues of interpretation and implementation of standards. In particular the adoption of lower limits or targets rather than maximum levels of provision is of concern to TfL. Encouragement should be given to developers who propose lower levels of parking, particularly in locations with good public transport access including town centres in line with the spirit of the London Plan and emphasised further in the draft Mayor's Transport Strategy. Initial advice from highways officers in pre application meetings should be to encourage developers to provide less than the maximum in appropriate locations and this approach needs to be carried right through to the final decisions made by Members.

Reducing parking ratios would be in line with existing trends and help to reinforce changes in travel behaviour away from car use. The volume of road traffic in London in 2015 was 10% lower than in 2000. This is not just confined to central or inner London because there a 6% reduction was also recorded in outer London. Car ownership per person has fallen dramatically over the past decade from 0.36 vehicles per person in 2005 to 0.32 vehicles per person in 2015. However, due to future population growth congestion is still predicted to rise by 22% in outer London by 2041. This growth makes it even more important that parking at new developments supports the wider trends away from car use.