

Parking demand at flatted developments in Barnet

The table from section 5 of Barnet's September 2011 evidence paper on Residential Car Parking Standards has been amended to incorporate comments made by TfL on 7th, 8th and 12th December 2011, including the insertion of a new column with TfL's own estimate of the maximum number of spaces that would be permitted by the London Plan.

Development	Number of units & mix	Total number of parked vehicles	Cars per unit	PTAL*	LBB Estimated maximum number of spaces as per London Plan**	TfL Maximum number of spaces permissible by the London Plan	Notes
<u>Site 1</u> 165 – 175 Great North Way NW4	24 flats (2 one bed, 22 two bed) DM17 standard = 22 to 35 spaces	37 (42 spaces)	1.54	1a (very poor)	23	23	There is also parking on adjacent highway access road
<u>Site 2</u> 94 – 96 Nether Street N12	9 flats (2 bed) DM17 standard = 9 to 13 spaces	8 (12 spaces)	0.88	3 (moderate)	5	8	There is also parking on adjacent highway access road
<u>Site 3</u> Land adjacent to Bunns Lane car park	36 flats (2 bed) DM17 standard = 36 to 54 spaces	46 (50 spaces)	1.28	3 (moderate)	Approx 21	35	
<u>Site 4</u> Spencer House 156 – 162 Station Road NW4	29 flats (3 one bed, 21 two bed, 5 three bed) DM17 standard = 26 to 42 spaces	20 (26 spaces)	0.69	4 (good)	Approx 15	25	There is also parking on adjacent highway access road
<u>Site 5</u> Friern Barnet town hall N11	49 flats (16 one bed, 33 two or three bed) DM17 standard = 33 to 65 spaces	38 (60 spaces)	0.78	3 (moderate)	Approx 29 if 2 bed or 39 if 3 bed	48 if 2 bed or 64 if 3 bed	
<u>Site 6</u> Brookside Court, Woodside Grange Road N12	15 flats (2 bed) DM17 standard = 15 to 22 spaces	13 (21 spaces)	0.87	1a (very poor)	14	14	1 hour CPZ with available on-street parking in close proximity to the site

*as defined by TfL in their 2010 Transport Assessment best practice guidance document

**given site PTAL level assumes an approximate 50% reduction would be applicable for PTAL 4 (and approximately 40% for PTAL 3) in line with wording beneath table of residential parking standards in the London Plan (page 205)

The following points should be noted:-

1. The surveys were carried out by experienced enumerators and the data has been re-checked to ensure it is 100% accurate. The methodology is the same as that used previously for the development of the standards in the UDP.
2. Barnet and TfL agree on the contents of the table. It should be noted that Barnet have used their own interpretation in column six, whereas TfL has requested that the maximum number of spaces permissible by the London Plan be included.

Review of TfL comments

TfL have made the following comments (in italics) which, notwithstanding the contents of the Council's September 2011 submission, are responded to in turn below. Following exchanges of emails and a meeting held on 12th December, TfL provided final comments on Barnet's responses.

1. (ref column 3) *how many parking spaces were observed at the development?*

The number of parking spaces is shown in the third column.

TfL response: Following the meeting on the 12th, Barnet has clarified the information provided in the table and added additional figures. The table now shows the number of spaces, number of cars and the maximum number of parking spaces permissible by the London Plan and proposed DM policy 17.

2. (ref sites 1 and 3) *How many vehicles parked outside of the site belonged to residents or visitors of the development and how many belonged to visitors or residents of adjacent development?*

Some vehicles outside the development on the access road may have been residents but this has not been assumed in any of the numbers in the table. Few if any will have been visitors as the surveys were carried out at 6am on a weekday.

TfL response: Following the meeting on the 12th, Barnet has clarified the nature of the sites surveyed. TfL is not familiar with the specific sites or locations however Barnet confirmed all sites include off site car parking in designated bays and that it is only these spaces which have been surveyed.

3. (ref sites 2, 3, 4 and 5) *The number of spaces permissible by the London Plan has been underestimated and only two of the sites surveyed were found to have more cars than maximum spaces permissible by the London Plan.*

The number of spaces permissible by the London Plan have been checked. Barnet have tried to be more precise in the estimates for the sites but disagree with TfL's figures. TfL do not appear to have applied the standards in London Plan Table 6.2 correctly, in that they appear to have ignored the first note in the footer text. Note that the estimate for the Friern Barnet Town Hall site was based on 33 two bed flats, and the estimate for the 33 three bed flats has now been added. Five of the sites surveyed are therefore considered to have more cars parked than would be permissible by the London Plan. Regarding site 5 (Friern Barnet town hall) the split between 2 and 3 bed flats has not been possible to obtain, but it is considered reasonable to assume they are not all (1 and) 3 bed. Therefore, the number of spaces permissible by the London Plan is almost certainly less than the 38 observed.

TfL response: Barnet have interpreted London Plan parking standards in one way, TfL has no objection to this as one way of interpreting the standards.

In practice, and as you can see from the divergence in the ratio of spaces to units in the table, is that standards can and should be interpreted on a site by site basis based on a number of factors, as noted in TfL's statement of 15th November.

If you look closely at the table you will see that only at sites 1 and 3 were more cars parked than parking spaces permissible by the London Plan observed. This indicates

that demand for parking spaces is lesser than the number of spaces permissible by the London Plan.

4. *It would be useful if you could add in the maximum permissible number of spaces if applying the proposed Barnet Development Management Policy for comparison.*

The maximum number of spaces permitted by the existing UDP / proposed LDF DM17 policies is included in the second column.

TfL notes the changes and these provide a useful context.

5. *If an area is already suffering parking stress without the effect of new development, the council must look to implement parking controls using Controlled Parking Zones or other methods. If the new development is likely to create or worsen parking stress the council should insist that new residents of the development are not entitled to purchase parking permits or insist that the developer provides car free residential units by allocating or leasing spaces.*

Barnet council agrees with this statement if it applies to an existing CPZ as it reflects our current practice, but Barnet's experience is that it is very difficult to implement a new CPZ for a small development in an isolated location, particularly outside a town centre or away from a tube or train station. A s106 contribution would be required to fund the feasibility work, and any implementation would be subject to consultation, including with Councillors, who may not approve it. That is why Barnet parking standard policy is designed to ensure that predicted demand can be mitigated by the development.

TfL response: TfL and Barnet do agree on the use and implementation of CPZ in appropriate circumstances.

If you look closely at the table you will see that the survey revealed that parking spaces were available at all six of the sites. This reveals that overspill parking and parking stress is not evident at any of the sites surveyed.

6. *The table should also demonstrate how many parking spaces were approved as part of the planning permission together with the maximum number of spaces permissible by the proposed Barnet Development Management policy?*

The number of parking spaces approved is the same as the number of spaces in the third column.

TfL response: Barnet have amended the table to indicate the number of spaces permitted as well as the number of cars parked, as with the previous response, this indicates that not all spaces were in use at any of the six sites surveyed.

7. *To make the survey fully robust would also require an assessment of car ownership within each development.*

The cars per unit in column 4 equates to the lowest possible level of car ownership, and is the best estimate that can be offered. It should be noted that cars per household in the 21 wards in Barnet varies from 0.82 in Burnt Oak to 1.3 in Edgware.

These randomly selected 6 sites are considered to provide a good representation of the range of borough sites.

TfL response: This is noted by TfL, however the table and the response has made an assumption about car ownership without providing any evidence.

TfL does not support a 'predict and provide' approach which is being advocated by Barnet. Developers should have a choice as to how much parking they can provide (as reflected in the objection by a2dominion), and new residents have the choice as to whether they wish to own a car.

8. *The Council has made assumptions in its note relating to the application of PTAL when considering parking standards eg. "...an approximate 50% reduction is assumed for PTAL 4 (and approximately 40% for PTAL 3), as an approximation for the term "significantly less than one space per unit"" This misinterprets the role of PTALs in determining levels of parking – they are merely indicative and form part of a number of wider considerations which might be made which support higher levels of parking. The London Plan does not specify that PTALs are the only determining factor and this is a misinterpretation by the Council.*

The first note in the text below the London Plan table of Parking for Residential Development (table 6.2, page 205) clearly states that "all developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit". Barnet Council has made the assumption that PTAL 4 represents good accessibility, and that this is not a cut-off point, but that an adjustment would also be considered with respect to other PTAL values, such as 3 and 5, hence the assumptions as stated beneath the Barnet table above. In the absence of any further guidance in the London Plan this approach is considered entirely reasonable. Barnet Council agrees that the PTAL only forms part of the consideration in determining car parking and this is consistent with 18.8 of DM17.

TfL response: Barnet have interpreted London Plan parking standards in one way, TfL has no objection to this as one way of interpreting the standards.

TfL welcomes that "all developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit" and that this is acknowledged by the council, as identified in TfL's statement of 15th December..

If you look closely at the table you will see only one of the sites surveyed has a good (or high) PTAL.

9. *The Council has made an assumption that "...application of London Plan standards...is likely to result in parking stress." This is a bold statement that is not backed up through evidence (given that TfL considers the figures in the original table (September) to be flawed)*

Barnet Council maintains the above assertion as it does not agree with some of TfL's figures. The evidence in the above table clearly indicates that there would be overspill parking for at least the first four sites when comparing the emboldened numbers in columns 3 versus 6.

TfL response: If you look closely at the table you will see that the survey revealed that parking spaces were available at all six of the sites. This reveals that overspill parking and parking stress is not evident at any of the sites surveyed.

10. *The Council states that new/additional parking controls would be necessary to mitigate lower parking standards and states that these "...could be unpopular with local communities...". The Council must recognise the role of CPZs as part of a package of measures which manage parking in the borough. New developments should not 'predict and provide' for parking.*

The Council fully recognises the role of CPZs and has a great deal of experience in investigating, introducing, operating and reviewing them, including in relation to new developments. It is accepted that in the vicinity of major developments and regeneration areas new or extended CPZs may be required, and the role of CPZs in relation to residential developments is set out in 18.8 of DM17. In Barnet it can therefore be seen that parking standards are applied in a measured way taking into account a range of factors, also including for example, contributions to non-car modes of transport, travel plan commitments and incentive funding, and introduction of car clubs.

TfL response: If you look closely at the table you will see that the survey revealed that parking spaces were available at all six of the sites. This reveals that overspill parking and parking stress is not evident at any of the sites surveyed.

TfL agrees as was set out in its statement of 15th November that a range of factors must be taken into consideration.

TfL requests that Barnet bring their residential parking standards in line with those in the London Plan, as is case with maximum standards as used by other outer London boroughs in recently adopted or consultation version LDF DM policies. This is a reasonable starting point for discussions between the council, developers and where appropriate TfL/ Mayor.