

# Hillingdon Parking Standards Justification

Assessment of Available Data

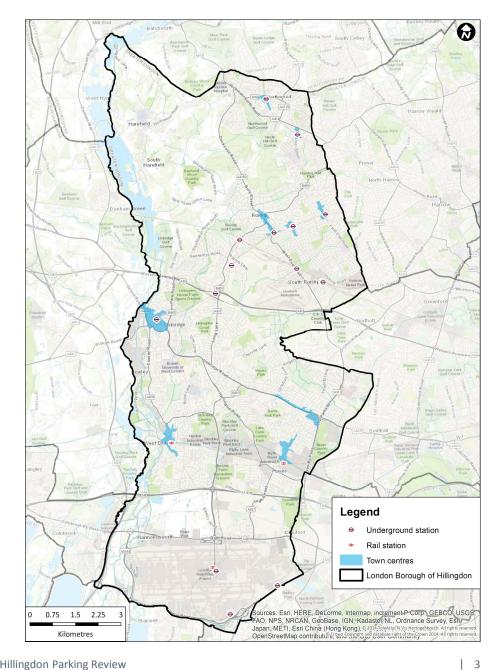
London Borough of Hillingdon

**≡** steer davies gleave

Introduction

#### Structure

- **Proposed Policy Context**
- Travel characteristics of LBH:
  - PTAL
  - Points of Interest
  - Journey Time
  - Car ownership
  - Census Data
  - London Travel Demand Survey Data
- Comparison of LBH with other Boroughs (both London and non-London)
- Summary



## Proposed LBH Local Plan Part 2 Parking Standards

As part of the Draft Local Plan 2 policies, LBH is proposing a series of parking standards for Office (B1) and Residential (C3) land uses that are above the standard set out in the London Plan (2016). The standards proposed in comparison to those in the London Plan are set out below.

#### Comparison of LBH Proposed Parking Standards with London Plan (2016)

Land use	London Plan outer London standard	London plan 'higher provision' standard	Hillingdon proposed standard	Difference (+/-)
Office (B1)				
Office m <sup>2</sup> (GFA) per parking space	100-600	50-100	50-100	None from higher standard
Residential (C3)				
Residential Studio Spaces per unit	Max 1	In outer London areas with low PTAL (generally PTALs 0-1), boroughs should consider higher	0.5	None
Residential 1 Bed Spaces per unit	Max 1	levels of provision, especially to address 'overspill' parking pressures.	1 to 1.5 / 2*	0.5 from Outer Standard
Residential 2 Bed Spaces per unit	Max 1	In outer London a more flexible approach for applications may also	1 to 1.5 / 2*	0.5 from Outer Standard
Residential 3 Bed Spaces per unit	Max 1.5	be acceptable in some limited parts of areas within PTAL 2, in locations where the orientation or levels of	2	0.5 from Outer Standard
Residential 4 Bed Spaces per unit	Max 2	public transport mean that a development is particularly dependent on car travel	2	None

<sup>\*</sup>All dwellings with curtilage should provide 2 spaces

# Definition of local authority categories

Outer London (20)	Inner London (12)	Edge of London boroughs (14)	Neighbouring boroughs to LBH (7)
Barking and Dagenham	Camden	Barnet	LB Ealing
Barnet	Greenwich	Bexley	LB Harrow
Bexley	Hackney	Bromley	LB Hounslow
Brent	Hammersmith and Fulham	Croydon	Slough
Bromley	Islington	Enfield	South Bucks
Croydon	Kensington and Chelsea	Harrow	Spelthorne
Ealing	Lambeth	Havering	Three Rivers
Enfield	Lewisham	Hillingdon	
Haringey	Southwark	Hounslow	
Harrow	Tower Hamlets	Kingston upon Thames	
Havering	Wandsworth	Redbridge	
Hillingdon	Westminster	Richmond upon Thames	
Hounslow		Sutton	
Kingston upon Thames		Waltham Forest	
Merton			
Newham			
Redbridge			
Richmond upon Thames			
Sutton			
Waltham Forest			

#### Background

This report has been prepared to summarise the review of data analysed in relation to travel characteristics, public transport availability, car ownership and locally relevant policy considered in the context of the proposed LBH parking standards.

A meeting with Transport for London (TfL) was held in September 2017 to discuss the scope for this study and consider the range of data, assessment techniques that may be available in order to assess the reasonable need for parking in LBH. TfL have since provided data to assist in this study from the London Travel Demand Survey (LTDS) which has been used to benchmark data derived from other sources such as census data. This presentation takes into consideration feedback from TfL on the use of data following a workshop in October 2017.

This report seeks to summarise the context within which LBH are seeking parking standards beyond that set out in the London Plan by identifying a set of specific and unique challenges relevant to the Borough. Specifically this report provides analysis:

- In relation to the proposed **Office** parking standard which seeks to demonstrate:
  - ...that transport connectivity and wider pressures on attracting job growth are such that LBH is reasonable in seeking to apply the 'higher standard' set within the London Plan; and
- In relation to the proposed **Residential** parking standard which seeks to demonstrate:
  - ....that public transport accessibility (PTAL) and wider road network connectivity represents unique challenges for residents of LBH that it is reasonable to consider the higher standard proposed within Local Plan Part 2 (as a maximum).

**≡** steer davies gleave

Travel Characteristics of LBH Public Transport Accessibility

#### **PTAL**

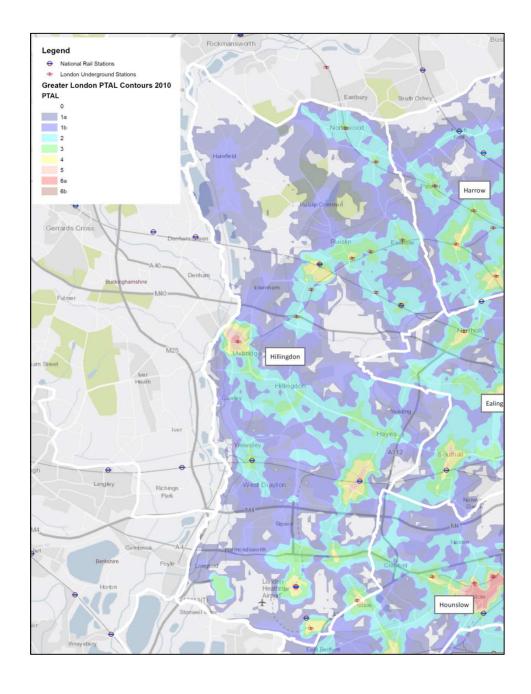
Despite the public transport connections within Hillingdon the overall PTAL of the Borough is low.

Key bus corridors, such as Uxbridge Road maintain a PTAL of less than 2 for the majority of its length.

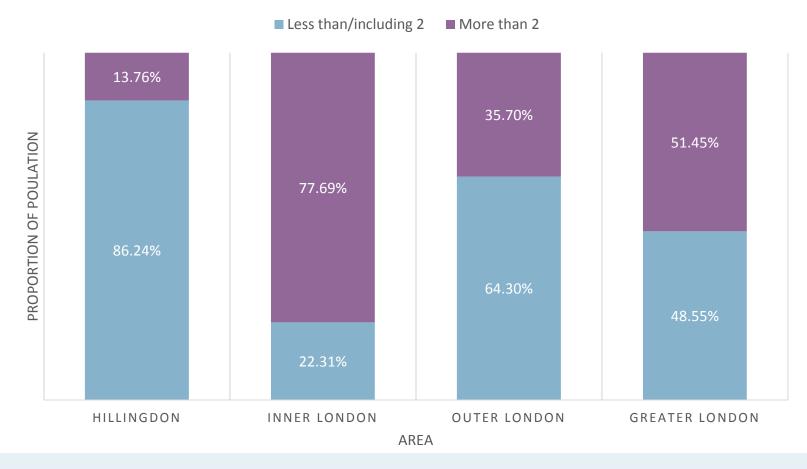
Numerous stations on the LUL and National Rail network also maintain low PTALs (3 or under) due to the limited frequency of services at these stations.

Only four locations within the Borough (Uxbridge Town Centre, Hayes, Ruislip and West Ruislip) have a PTAL that exceeds 4.

PTAL within the majority of LBH is very low – 86% of the population is situated within a PTAL of 2 or below.



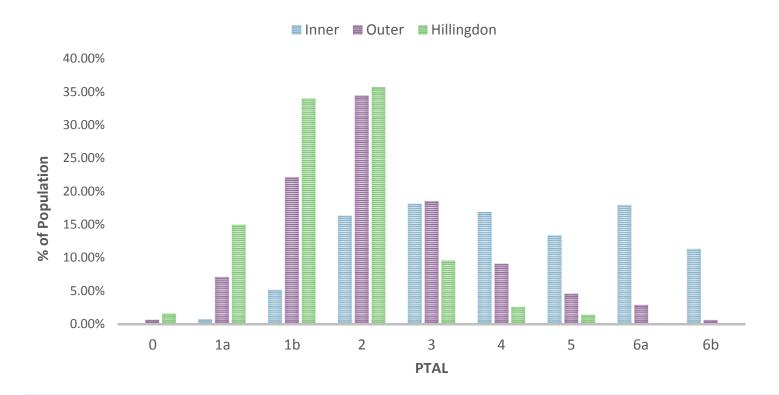
## **PTAL Comparisons**



LBH has a significantly greater percentage of the population that live within an area with a PTAL of 2 or under than the overall London average with 86% of residents located in an area of PTAL 2 and below.

# PTAL and Population Comparisons

A breakdown of population by PTAL rating shows that there is a very limited number of people that live within an area with a PTAL rated as either 'Good', 'Very Good' or 'Excellent'.

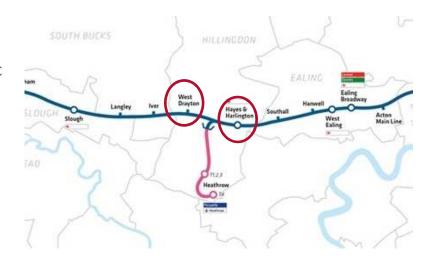


LBH is extremely limited in terms of PTAL when compared to both inner and outer London Boroughs. 51% of the population live in a PTAL of between 0 and 1b. This suggests that the application of the London Plan's higher parking scenarios for residential development are reasonable.

#### Impact of Crossrail

An assessment of the impact of Crossrail upon future PTAL ratings in LBH has been undertaken to show whether there will be any marked improvement in public transport accessibility in the borough.

Hayes and Harlington, and West Drayton are the only stations in LBH that will access Crossrail services to central London in the east and Reading / Heathrow airport in the west. A comparison in PTAL rating for the area surrounding these 2 stations between the baseline situation and 2021 (following delivery of Crossrail) is examined below.



#### **Difference in Existing and 2021 PTAL Rating**

Station	Existing PTAL	2021 PTAL (with Crossrail)	Crossrail service frequency - (every x mins)	
	Peak	Peak		
Hayes and Harlington	5	6a	6	
West Drayton	4	4	10	

Source: TfL WebCAT tool

There will be an improvement in PTAL rating at Hayes and Harlington railway station due to the high service frequency of Crossrail, however West Drayton will experience no improvement. Any benefits from Crossrail will be retained within the southern part of the borough failing to address the low PTAL ratings through the central and northern parts of LBH with no additional inter-borough connectivity.

# **Public Transport Accessibility**

An assessment of public transport accessibility for trips within LBH has been undertaken to understand the propensity for internal trips to be made by alternative means. LBH has previously identified this as a key transport constraint for the Borough with limited radial / north-south public transport routes.

#### Hillingdon Travel Times – Public Transport vs Car (difference in minutes)

Site Name	Brunel University	Eastcote Station	Harefield Hospital	Hayes & Harlington railway station	Hillingdon Hopital	Ickenham Station	M4 Junction 4	Mount Vernon Hospital	Northwood Station	Ruislip Station	Stockley Park	Uxbridge Station	West London Industrial Park
Brunel University	0.0	14.1	25.9	22.8	6.8	17.5	17.8	29.0	44.0	21.8	9.7	9.2	0.5
Eastcote Station	11.9	0.0	38.7	31.0	10.5	-0.1	40.8	31.7	4.3	-7.2	34.6	-4.4	22.9
Harefield Hospital	25.7	33.2	0.0	41.9	22.2	28.3	51.4	9.6	7.3	26.2	46.0	9.8	35.9
Hayes & Harlington railway station	24.7	27.3	45.1	0.0	11.3	32.5	7.5	48.5	62.0	36.4	-6.6	18.6	14.0
Hillingdon Hopital	9.3	10.8	25.6	11.0	0.0	14.2	13.1	26.7	44.4	18.5	-3.2	8.8	-2.3
Ickenham Station	17.4	-0.1	34.5	30.5	16.0	0.0	41.1	33.6	24.1	0.9	24.3	1.1	21.5
M4 Junction 4	16.6	39.9	55.1	8.5	10.4	40.3	0.0	57.8	57.0	39.2	18.9	17.8	21.1
Mount Vernon Hospital	25.1	30.5	9.5	44.1	21.7	28.0	50.6	0.0	-1.5	19.7	56.2	8.4	36.3
Northwood Station	38.9	6.4	7.7	60.1	36.0	24.4	48.8	-2.3	0.0	16.2	49.0	19.6	33.6
Ruislip Station	21.7	-6.6	29.9	37.2	21.3	1.0	42.1	20.6	16.5	0.0	24.0	3.1	23.2
Stockley Park	7.2	35.8	46.9	-7.5	-1.6	24.2	20.3	51.5	44.2	28.0	0.0	4.7	23.6
Uxbridge Station	6.7	-5.8	9.7	15.9	5.8	-1.4	15.9	8.7	20.4	0.7	2.1	0.0	-0.1
West London Industrial Park	-0.7	24.8	38.8	15.6	-1.7	23.9	20.9	39.8	39.4	21.4	24.6	3.1	0.0

Theme	Proportion
% of trips quicker by car than public transport	89%
% of trips 10 minutes quicker by car than public transport	84%
% of trips 20 minutes quicker by car than public transport.	71%

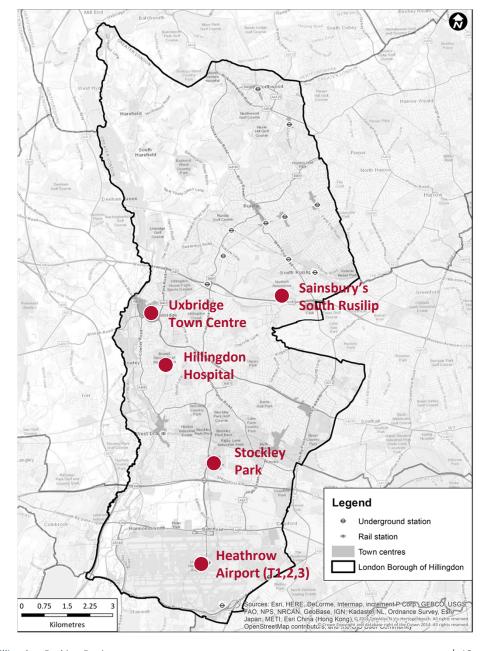
Public transport does not provide a viable alternative for a large proportion of trips within LBH with the overwhelming majority of journeys quicker by car than public transport.

# Travel Time Assessment to Key Destinations

To understand in detail the constraints of access between car and public transport several key sites throughout the Borough have been selected and the travel time between each site assessed.

The following key sites were selected which were considered to represent a varied number of sites by use, attraction and geography across the borough:

- Site 1: Uxbridge Town Centre
- Site 2: Hillingdon Hospital
- Site 3: Heathrow Airport T1,2,3
- Site 4: Stockley Park
- Site 5: Sainsburys Supermarket (Victoria Road ,South Rusilip)



# Travel Time Assessment to Key Destinations

< 10 min journey time

10-20 min journey time

20-30 min journey time

30-40 min journey time

40-50 min journey time

50-60 min journey time

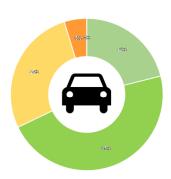
Heathrow T1, T2, T3

Sainsbury's South Ruislip

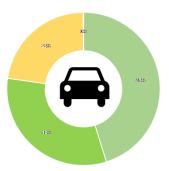
Stockley Park

Hillingdon Hospital

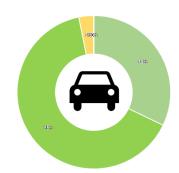
**Uxbridge Town Centre** 

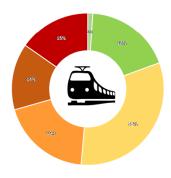


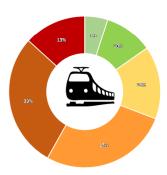


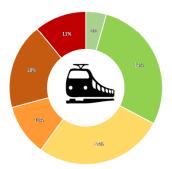


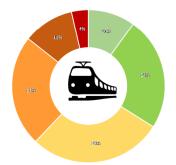


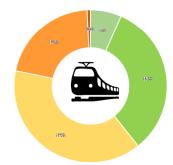












#### Travel Time Assessment to Key Destinations

Key findings from travel time assessment:

- Heathrow....
  - 95% of population within a 30 minute journey by car; whilst
  - 51% of population within a 30 minute journey by public transport.
- Hillingdon Hospital....
  - 89% of the population within a 20 minute journey by car; whilst
  - 34% of the population within a 20 minute journey by public transport.
- Uxbridge Town Centre....
  - 97% of the population within a 30 minute journey by car; whilst
  - 40% of the population within a 20 minute journey by public transport.

The travel time assessment to key destinations demonstrates the disparity between car and public transport journey times in LBH as a result of public transport provision that is orientated to many destinations outside of the Borough and not within. For some residents, particularly those that work within the Borough (46,000 employees equivalent to 43% of the working population), this necessitates the need for a car.



**1.2million**LBH residents within a 20 minute car journey of each of the 5 selected sites.



**400,000**LBH residents within a 20 minute public transport journey of the 5 selected sites.

# **Accessibility of Cycling**

An assessment of cycling trips has also been undertaken to understand the viability of cycling as an alternative means of internal Borough trips by car as requested by TfL.

#### Hillingdon Travel Times – Cycling vs Car

Site Name	Brunel University	Eastcote Station	Harefield Hospital	Hayes & Harlington railway station	Hillingdon Hopital	Ickenham Station	M4 Junction 4	Mount Vernon Hospital	Northwood Station	Ruislip Station	Stockley Park	Uxbridge Station	West London Industrial Park
Brunel University	0.0	10.3	19.3	16.1	2.5	6.8	2.7	22.0	36.3	15.9	-7.4	-2.6	-12.6
Eastcote Station	8.0	0.0	24.9	20.1	9.0	1.8	39.1	16.6	5.2	-8.5	37.1	7.2	27.3
Harefield Hospital	13.4	21.7	0.0	32.5	18.4	18.9	39.4	3.8	6.5	14.1	38.0	9.8	23.7
Hayes & Harlington railway station	16.0	21.9	37.8	0.0	8.3	15.5	-2.5	41.3	50.3	30.7	-12.4	18.4	4.4
Hillingdon Hopital	1.5	10.6	22.6	9.7	0.0	6.1	-1.0	24.4	35.6	15.2	-11.1	2.6	-10.2
Ickenham Station	5.5	3.8	23.4	17.6	7.4	0.0	36.4	18.2	18.5	2.7	14.8	5.5	20.8
M4 Junction 4	3.2	42.3	44.6	-1.2	0.1	26.8	0.0	47.1	45.5	29.5	2.5	12.2	10.4
Mount Vernon Hospital	14.5	14.8	3.8	36.5	20.5	12.3	40.2	0.0	-8.8	6.9	46.0	10.7	26.0
Northwood Station	25.4	2.5	7.7	50.6	31.9	13.3	46.4	-7.7	0.0	15.6	30.9	20.9	30.3
Ruislip Station	13.5	-6.9	17.4	32.0	15.5	1.6	38.1	10.7	17.7	0.0	19.2	12.4	23.0
Stockley Park	-8.5	38.8	42.7	-11.4	-11.5	13.2	2.2	50.4	32.3	17.9	0.0	-0.4	7.9
Uxbridge Station	-3.4	8.6	13.6	15.8	2.2	5.1	7.1	16.4	23.2	13.0	0.4	0.0	-5.1
West London Industrial Park	-12.9	27.4	28.6	4.4	-8.0	18.0	10.4	30.7	35.1	20.3	7.9	-2.9	0.0

Theme	Proportion
% of trips quicker by car than cycling	86%
% of trips 10 minutes quicker by car than cycling	61%
% of trips 20 minutes quicker by car than cycling	35%

Cycling does not provide a viable alternative for a large proportion of trips within LBH with the overwhelming majority of journeys quicker by car than by cycling.

# Potential Number of switchable trips (to cycling)

#### Calculation (derived from Analysis of Cycling Potential by TfL, 2010)

Reason for exclusion as a cyclable trip	Hillingdon car driver commuter data	Comments
Person carrying a heavy or bulky load	27.5%	Hillingdon data not available. Based on TfL report data
Trip is longer than 8km	44.8%	Census 2011 distance travelled to work (Hillingdon car driver)
Trip would take over 20% more time to cycle	71%	Hillingdon cycle vs car origin-destination trip matrix
Traveller is over 5 and under 64	0.0%	Assumed zero (commuter trips only)
Trip is made between 8pm and 6pm	0.0%	Assumed zero (commuter trips only)
Traveller has a disability affecting their travel	11.2%	Census 2011 long-term health problem or disability (Hillingdon aged 20-64)
Trip is made by van, dial-a-ride, plane or boat	0.0%	Assumed zero (no data for Hillingdon)

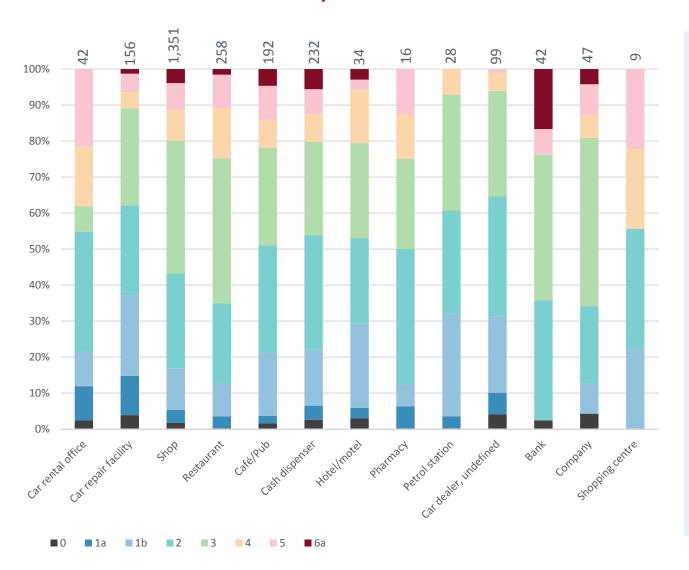
#### Limited opportunity for switchable trips.

The nature of trips and travel within LBH suggests that there are a limited number of trips capable of being 'switchable' in accordance with TfL's definition.

**≡** steer davies gleave

Point of Interest vs PTAL
Assessment

## LBH Points of Interest by PTAL

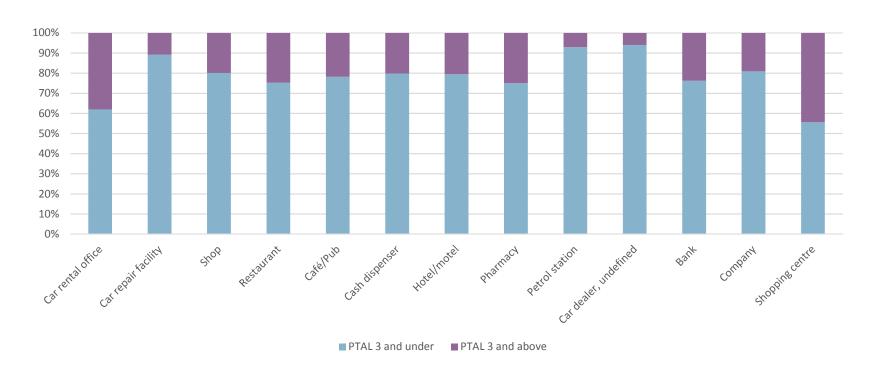


An assessment of 2,506 Points of Interest within LBH has been undertaken to understand how accessible they may be for trips originating both within and outside the Borough.

46% of all Points of Interest are located within a PTAL of 2 or less.

86% of all Points of Interest are located within a PTAL of 3 or less.

## LBH Points of Interest by PTAL



- 89% of all shops are located within a PTAL of 3 and under.
- 74% of pharmacies are located in a PTAL of 3 or less.
- 76% of restaurants are located in a PTAL of 3 or less.

The majority of Points of Interest within LBH – particularly those associated with regular every day use – are located in areas with limited accessibility to public transport and suggest the need for alternative means of accesses these sites.

## Points of Interest by PTAL Compared to Wider London

A comparison of the Points of Interest within LBH has been made with similar Points of Interest across Inner London, Outer London and the entire GLA boundary.



LBH has a significantly larger proportion of Points of Interest in areas with a low PTAL than the Inner and Outer London Borough averages.

The majority of Points of Interest within LBH are located in areas which have limited access to public transport and therefore use and need of a car is considered to be reasonable.

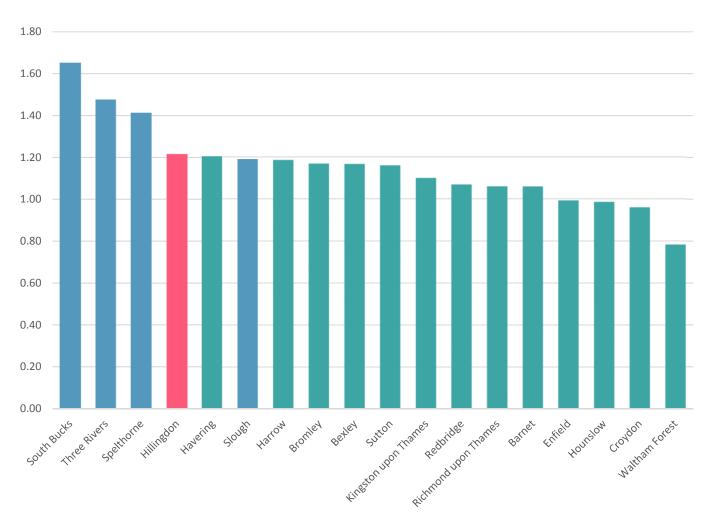
**≡** steer davies gleave

Travel Characteristics of LBH

Car Ownership

## Car ownership

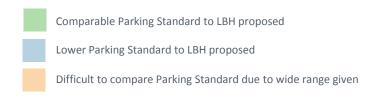
#### **Car Ownership per Residential Unit (Census 2011)**

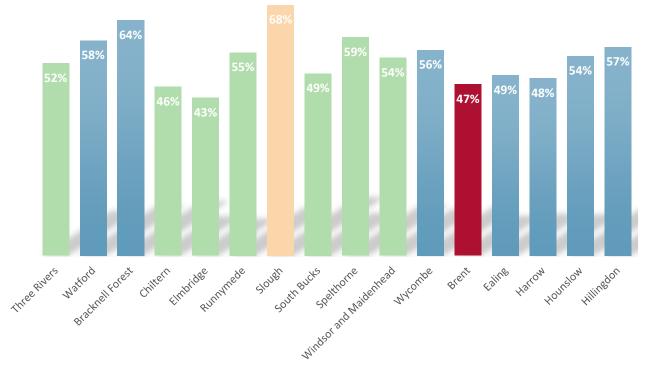


Census data demonstrates that in LBH there are 1.22 cars per residential unit.

This is the highest car ownership rate in London and appears to directly correlate with the fact that LBH has the lowest average PTAL.

## Percentage of Cars used to Travel to Work (Census 2011)





LBH: every 1 parking space is equal to 0.57 vehicle trip to work.

Census data for neighbouring local authorities has been compared to understand the percentage of cars used to travel to work in areas where residential car parking standards are higher than those proposed for LBH.

Neighbouring local authorities with parking standards that are comparable to those proposed for LBH demonstrates that they do not necessarily translate into vehicle trips to work.

## Ownership vs Use

Car ownership and use for travel to work across LBH and all London Boroughs is useful in attempting to understand the relationship between car ownership, availability and use of cars for travel to work.

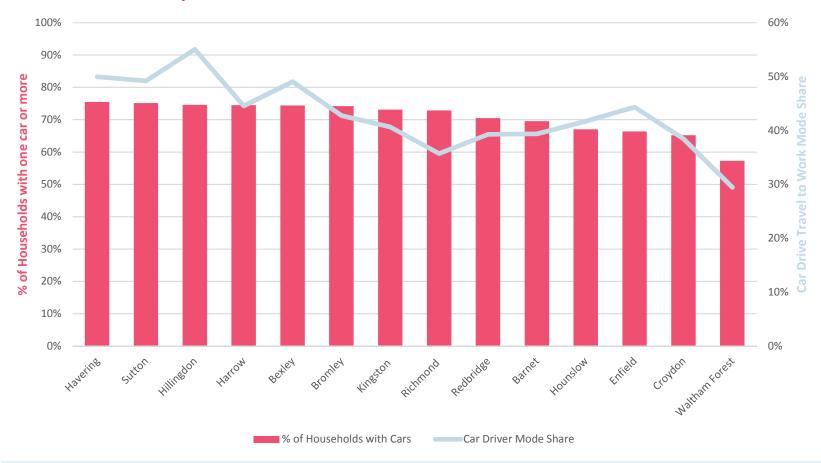
#### Hillingdon compared to all other London Boroughs (Census 2011)

Area	Households with Cars	Car Driver to Work Mode Share	% of Cars Owned used for Work
Hillingdon	77%	55%	57%
Average of Edge of London Boroughs	72%	43%	47%
Difference	5%	12%	10%

52,000 cars that are parked within Hillingdon <u>are not</u> used regularly for work travel. This supports the understanding of travel within LBH that whilst cars are not always necessarily required for work travel they are necessary for other elements of travel.

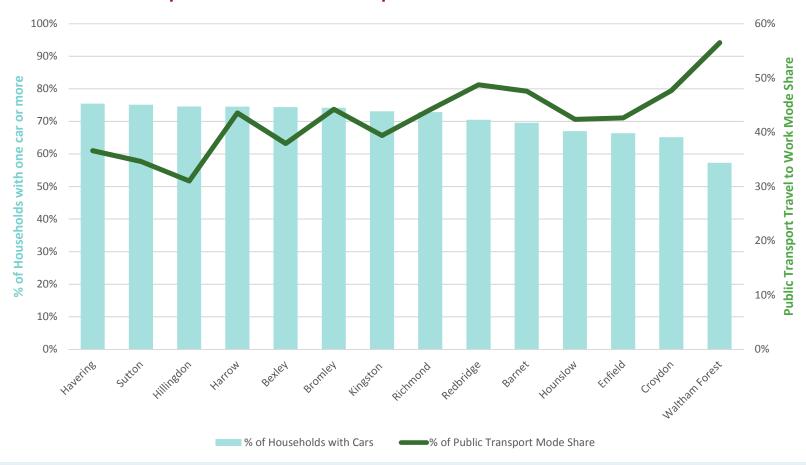
There is not a linear relationship between car ownership and car driver to work mode share. The Car Driver to Work mode share between LBH and the average of Edge of London Boroughs is significantly different but the proportion of cars owned is not. This indicates that availability of a car does not necessarily translate into a use for that car to travel to work.

## Car Ownership vs Car Use



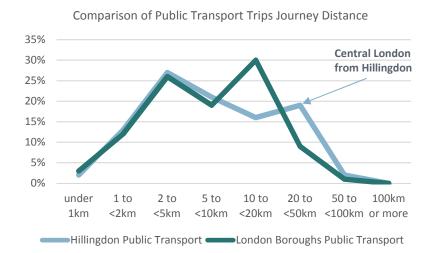
The relationship between car ownership and car driver to work mode share demonstrated across all boroughs does not appear to be linear. Boroughs with a similar percentage of car ownership have significantly less Car Driver to Work mode share suggesting factors other than the availability of a car is influencing how people travel to work.

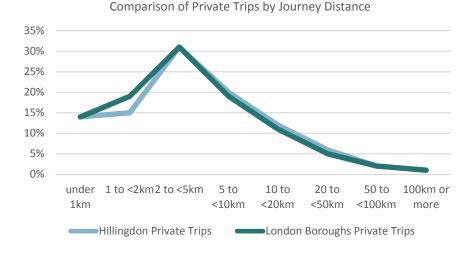
## Car Ownership vs Public Transport Use



The very low Public Transport Travel to Work mode share in LBH in comparison to all other Edge of London Boroughs suggests something more substantial that simply car ownership influences travel to work mode choices – most probably the poor quality of public transport and lack of public transport accessibility.

#### Comparison of Trips by Distance





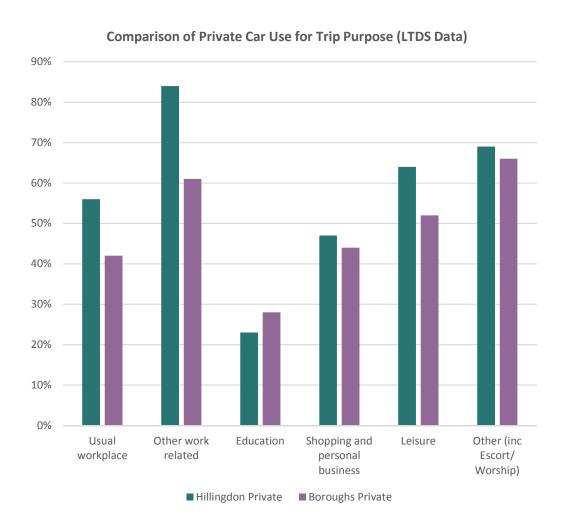


LTDS data provided by TfL highlights that there is no significant difference between walking and cycling propensity by trip distance between LBH and other London Boroughs.

There is a lower number of private trips made in LBH for journeys less than 2km that average across London Boroughs.

The disparity in Public Transport trips by distance is likely a result of the location of Central London relative to the majority of LBH.

#### Ownership vs Use

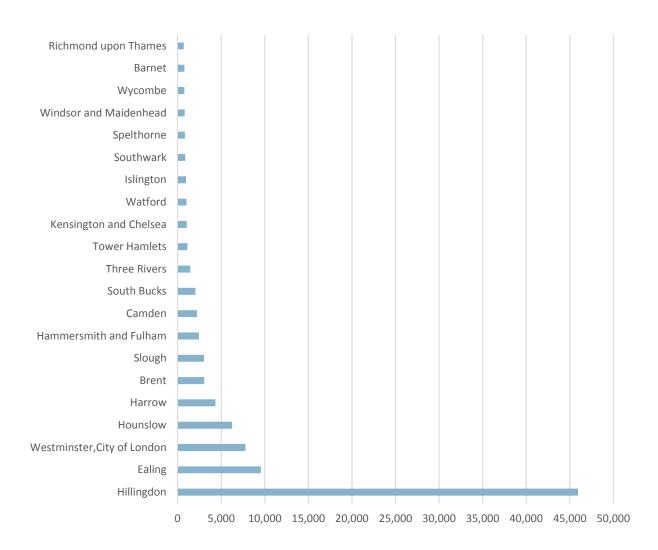


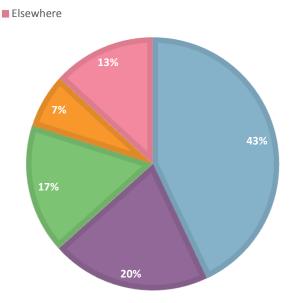
52,000 cars that are parked within Hillingdon <u>are not</u> used regularly for work travel.

LTDS data shows that whilst private car use for work is higher than the average across all London Boroughs it is equally higher for other types of trips such as shopping, personal business and leisure.

This supports the understanding of travel within LBH that whilst cars are required for work as well as other trips purposes due to the lack of public transport accessibility and connectivity within the Borough.

#### LBH Residents – Place of Work





■ Outer London

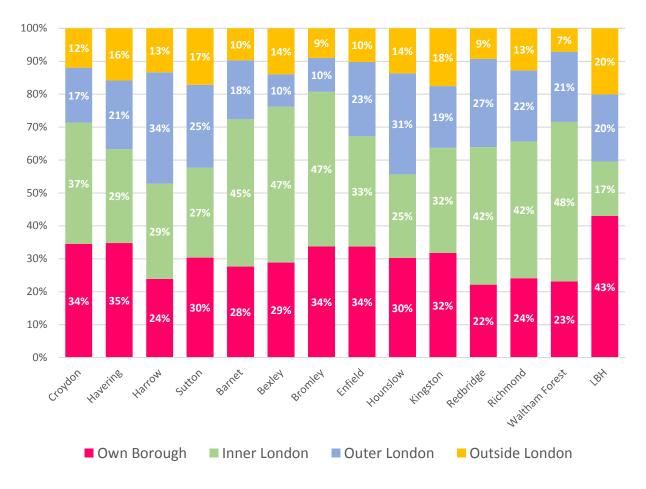
■ Other Neighbouring Borough

Hillingdon

■ Inner London

A large majority of LBH residents work within LBH. A greater proportion of LBH residents work in Outer London than Inner London. This suggests that the pattern of travel to work is not dominated by trips to Central London as in most other London Boroughs.

#### Place of Work – Comparisons with Other London Boroughs



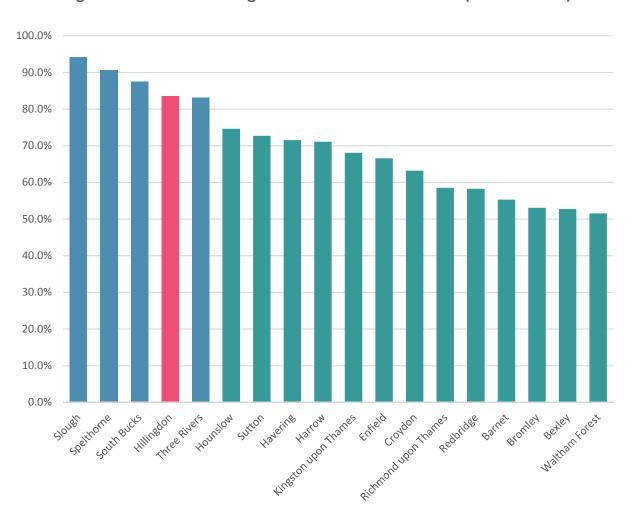
In comparison to all Outer London Boroughs LBH is characterised by:

- the highest proportion of residents that work within their own Borough - 43% (13% higher than the average);
- the lowest proportion of residents that work within Inner London - 17% (19% lower than the average); and
- the highest proportion of residents that work
   Outside of London – 20% (7% higher than the average)

The places where LBH residents work are fundamentally different to most other Outer London Boroughs. This inevitably influences where and how residents within LBH travel to work.

#### Travel to work

#### Percentage of residents working outside of Central London (Census 2011)



LBH is far more comparable with non-London Boroughs with regards to the percentage of the population that work in Central London.

The higher propensity of residents that work outside of Central London results in a greater need for a car given the poor public transport connections within LBH and to other surrounding boroughs.

#### Shift Work

- Shift work is a prominent means of employment within LBH. The nature of shift work, particularly in areas where public transport accessibility is low and connectivity poor, can often require the means of a car to travel to work.
  - Data from the ONS Labour Force Survey (2014) highlights that 14% of the London population and 16% of the South East population aged over 16 in full time employment are involved in shift work.
  - Heathrow Airport employees 8,960\* LBH residents within the airport – this equates to approx. 7% of the local employment population.

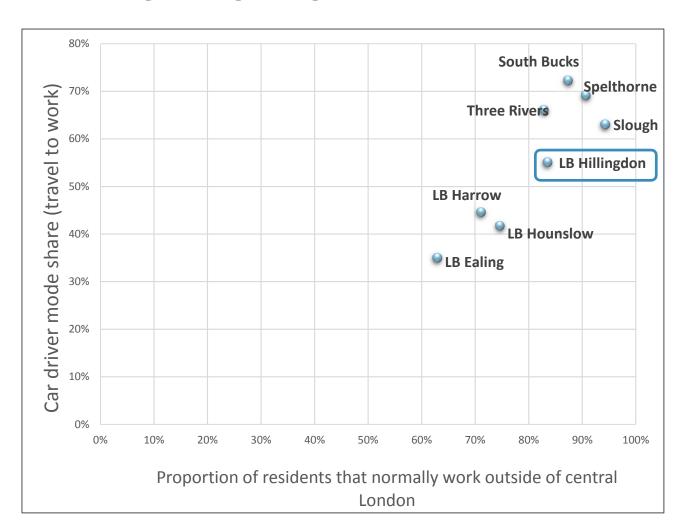
The nature of employment in LBH, and particularly the high number of shift workers (LBH Employment Land Study, 2009) results in the need for a certain number of residents to own a car for travel to work.



\* Airport's Commission (2015)

# Car Driver Mode Share (JTW) vs workplace destination

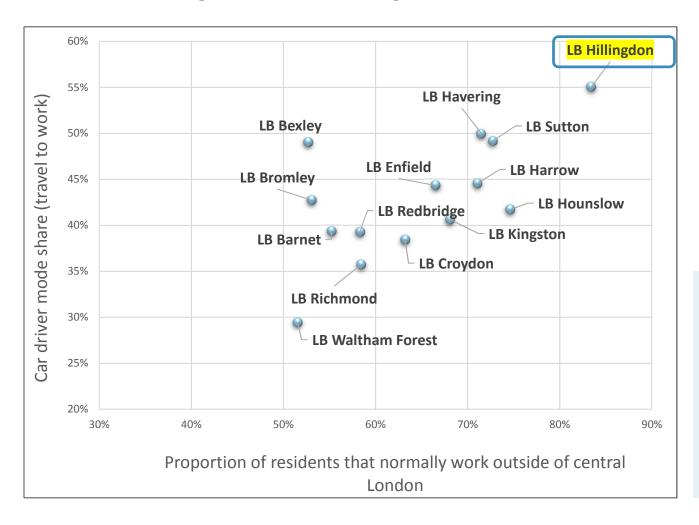
#### **LBH and Neighbouring Boroughs**



In terms of where residents work, LBH bridges a gap between the proportion of residents that normally work outside of Central London within Edge of London and non-London Boroughs.

# Car Driver Mode Share (JTW) vs workplace destination

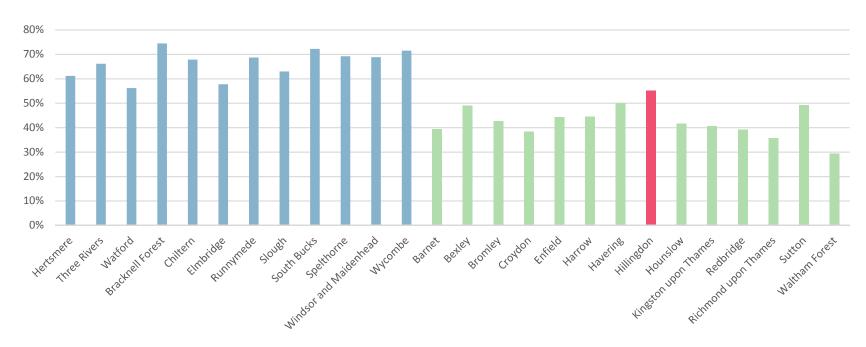
#### LBH and other Edge of London boroughs



LBH has a significantly higher proportion of residents that work outside of Central London which is considered to impact on the resulting Car Driver Travel to Work mode share.

It is not only the availability of a car that influences mode choices for residents travelling to work but the location and type of work made by LBH residents.

#### Car Driver Mode Share Travel to Work



LBH has the highest proportion of residents travelling to work by car reflecting a range of factors:

- The higher than average number of residents that work outside of Central London;
- The nature of many residents works; and
- Poor accessibility to public transport in comparison to other London Boroughs,

The likelihood of this changing without a step change in public transport and a limited number of switchable trips within LBH is considered to be low. As such, a different approach to parking provision for LBH is considered to be appropriate.

**≡** steer davies gleave

Proposed Parking Standards - Office

## Office parking standards

Public transport accessibility is significantly lower in LBH when compared to many other London Boroughs.

Geographically, LBH is also located on the boundary of London with strategic road connections to the West of England and Wales (via the M4) and the Midlands (via the M40). This makes it one of the few London Borough's in London that is able to attract certain businesses that require road access to the remainder of the UK.

Given the two factors above LBH is seeking a standard that is compliant with the higher limit set out in the London Plan for Outer London where a more generous standard can apply where identified.

### Hillingdon Parking Standards compared to London Plan (2016)

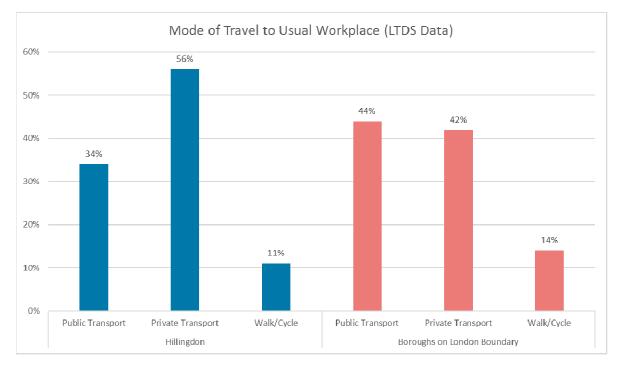
Development Plan	Parking Standard	B1 office m² (GFA) per parking space
London Plan (Higher Standard)	Adopted 2016	50-100
Hillingdon (Local Plan Part 2)	Draft 2015	50-100

The proposed LBH Parking Standards reflect the higher standard deemed acceptable if a need is identified – this document is deemed sufficient to identify a need for the application of the higher standard and as such the proposed standards are considered to be compliant with the London Plan.

## Origin of People Working within LBH

	Number Working in LBH		Number of people driving into work in the borough	Car Driver Mode Share	
Hillingdon	45,948	34%	25,195	55%	
London Boroughs	44,912	33%	24,794	55%	
Other LAs	44,695	33%	38,691	87%	

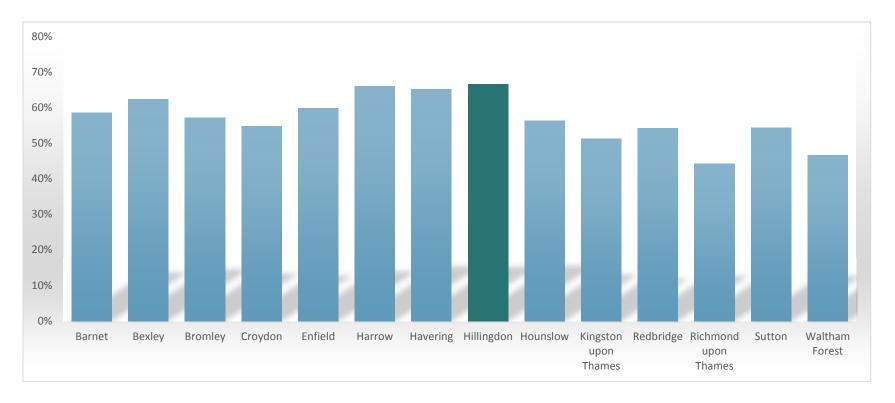
LTDS data reflects Census data noting that Car Driver to Work Mode Share is approximately 55% suggesting a degree of accuracy within both data sets.



33% of employees within LBH come from outside of London where the Drive to Work mode share is 87% - as such LBH considers a genuine need for parking at workplaces to accommodate people travelling into LBH to work.

## Car Driver Frequency

LTDS data captures the proportion of drivers that drive 5 days a week across all Outer London Boroughs.



The regular use of cars within LBH shown in the LTDS data is considered to reflect:

- the higher proportion of people within LBH that work outside of London and therefore more readily require a car (33%); and
- the limited public transport connections for those people that both live and work within LBH that in many instances requires the regular use of a car for work (34%).

# Office parking standards

### Hillingdon office parking standards compared to 'Edge of London' local authorities

Local authority	Local worker commute by car	Parking standards status	B1 office m² (GFA) per parking space
Hillingdon	59.7%	Draft 2015	50-100
Hounslow	65.4%	Adopted 2015	100-600
Bexley	63.0%	Adopted 2012	100-600
Bromley	57.4%	Draft 2015	100-600*
Harrow	56.0%	Adopted 2013	100-600
Enfield	54.2%	Adopted 2014	100-600
Kingston	53.5%	Adopted 2013	100-600
Havering	52.9%	Adopted 2008	100
Richmond	51.8%	Draft 2016	100-600
Barnet	51.5%	Adopted 2012	100-600
Redbridge	47.9%	Draft 2016	100-600
Croydon	45.3%	Draft 2016	100-600
Sutton	43.7%	Draft 2016	100-600
Waltham Forest	43.5%	Adopted 2013	150-300

## Office parking standards

### Hillingdon office parking standards compared to adjacent non-London authorities

Local authority	Local worker commute by car	Parking standards status	B1 office m² (GFA) per parking space
South Bucks	76.0%	Adopted 2011	25
Three Rivers	72.6%	Adopted 2013	30
Slough	71.4%	Adopted 2010	40
Spelthorne	70.1%	Adopted 2011	Max 35-50
Hillingdon	59.7%	Draft 2015	50-100

The London Plan makes an acceptance for Outer London Boroughs to consider higher parking standards recognising the competition faced in attracting employment uses in comparison to neighbouring Boroughs. As shown above, the proposed LBH parking standards are significantly lower than those competing authorities.

The proposed LBH parking standards are lower than those in adjacent non-London authorities, many of which LBH are competing against to attract investment for job creation and growth. Given the proposed standards reflect the higher standard of the London Plan they are considered to be entirely reasonable.

**■** steer davies gleave

Proposed Parking Standards - Residential

### Residential parking standards

Public transport accessibility is significantly lower in LBH when compared to many other London Boroughs as demonstrated previously.

### Hillingdon residential parking standards compared to London Plan (2016)

Local authority	Car ownership per unit	Parking standards status	C3 (studio) spaces per unit	C3 (1 bed) spaces per unit	C3 (2 bed) spaces per unit	C3 (3 bed) spaces per unit	C3 (4+ bed) spaces per unit
London Plan	N/A	Approved 2016	Max 1	Max 1	Max 1	Max 1.5	Max 2
Hillingdon	1.21	Draft 2015	0.5	1-1.5	1-1.5	2	2
Difference	-	-	None	0.5	0.5	0.5	2

#### London Plan 2016 caveats

- In outer London areas with low PTAL (generally PTALs 0-1), boroughs should consider higher levels of provision, especially to address 'overspill' parking pressures.
- Provision depends on unit size (habitable rooms per unit) and building density (units per hectare).

#### Hillingdon caveats

- All dwellings with curtilage should provide 2 spaces.
- All standards are assumed to be maximum.

LBH are not seeking to apply a minimum standard but allow developers the flexibility to provide parking where and when the market believes it necessary and to mitigate the negative impacts of associated under parking provision that is prevalent in the Borough.

The London Plan allows the consideration of higher levels of provision in areas with poor accessibility to public transport to address parking pressures.

## Residential parking standards

Hillingdon residential parking standards compared to 'Edge of London' local authorities

Local authority	Studio	1 Bed	2 Bed	3 Bed	4 Bed
Hillingdon	0.5	1-1.5	1-1.5	2	2
Havering	Max 1	Max 1	Max 1	1-1.5	1-1.5
Harrow	Max 1	Max 1	Max 1	1.5	2
Bromley	-	0.7-1	0.7-1	1-1.5	1.5-2
Bexley	Max 1	Max 1	Max 1	1-1.5	1.5-2
Sutton	Max 1	Max 1	Max 1	1.5	2
Kingston	Max 1	Max 1	Max 1	1-1.5	1.5-2
Redbridge	-	0.2-1	0.2-1	0.2-2	0.2-2
Richmond	-	Max 1	Max 1	1.5-2	1.5-2
Barnet	-	Max 1	1-1.5	1-1.5	1.5-2
Enfield	-	Max 1	Max 1	1-1.5	1.5-2
Hounslow	-	Max 1	Max 1	1.5	2
Croydon	-	Max 1	Max 1	1.5	2
Waltham Forest	-	0.25-1	0.25-1	0.5-1	0.5-1

LBH is not the only Borough to seek parking provision for up to 2 spaces per unit for 4 beds. LBH is aligned with Redbridge, Richmond for 3 parking provision for 3 beds and with Barnet for 2 beds.

## Residential parking standards

LBH also competes with adjacent non-London authorities in attracting investment through residential development where parking is seen by some developers as a valuable market resource.

### Hillingdon Residential Parking Standards compared to adjacent non-London authorities

Local authority	Car ownership per unit	C3 (studio) spaces per unit	C3 (1 bed) spaces per unit	C3 (2 bed) spaces per unit	C3 (3 bed) spaces per unit	C3 (4+ bed) spaces per unit
Hillingdon	1.21	0.5	1-1.5	1-1.5	2	-
South Bucks	1.65	1	1	2	2	3
Three Rivers	1.47	1.75	1.75	2	2.25	3
Spelthorne	1.41	Min 1-1.25	Min 1-1.25	Min 1.25-1.5	Min 1.75-2.5	Min 1.75-2.5
Slough	1.19	Min 0-2	Min 0-2	Min 0-2	Min 0-2	Min 0-3
W-dsor & M-head		0.5-1	0.5-1	1-2	1-2	2-3
Elmbridge		1	1	1.5	2	2
Runnymede		1	1	1.5 – 2	2	2

Proposed LBH Parking Standards are comparable and in many instances lower when compared to local authorities (non-London) that have shared boundaries.

To attract residential investment LBH is competing against neighbouring authorities with greater flexibility to provide parking despite providing many of the same localised access to the jobs and other facilities.

**≡** steer davies gleave

Summary & Conclusions

## Summary (1)

### **Draft LBH Local Plan Proposals**

The London Borough of Hillingdon (LBH) is seeking to set standards for parking that:

- For Office (B1) parking standard: are in line with the 'higher standard' set out in the London Plan (2016)
- For Residential (C3) parking standard: are 0.5 spaces per unit higher than the 'outer London standard' for 1, 2 and 3 bedroom units.

Each of the proposals above will set a maximum standard allowing the developer to justify the level of parking within each development on a site by site basis. There is no requirement to meet this standard in any application but gives the developer to do so if they believe it beneficial to either:

- ensure the commercial success of development; or
- reduce the impacts of limited parking provision upon the streets within the local vicinity, particular overspill parking into adjacent neighbourhoods.

### **Proposed Office Standards**

The proposed Draft Local Plan standards for office is considered reasonable due to:

- The challenges from local authorities from outside of London who have parking standards which are in some instances double that proposed within the LBH Local Plan; and
- Responds to the fact that 33% of employees within Hillingdon travel from outside of London where Car Driver Mode share to work is 87%.

LBH primarily competes with local authorities outside of London in attracting businesses to the area. The proposed LBH provision is considered to be reasonable in ensuring that LBH can attract businesses and ensure job creation.

## Summary (2)

### **Proposed Residential Standards**

The proposed Draft Local Plan standards for residential are considered reasonable due to:

- LBH is not alone amongst London Boroughs in seeking parking provision for 2 beds up to 1.5 spaces per unit (Brent) and parking provision for 3 beds up to 2 spaces per unit (Redbridge and Richmond);
- The proposed standards are unanimously lower than neighbouring non London authorities that share a boundary with LBH against which LBH are competing with for private developer investment;
- LBH has extremely poor public transport accessibility (percentage of PTAL by area) in comparison to all other London Boroughs, typified by:
  - 86% of the residential population living within an area of PTAL less than 2 (defined as 'poor' by TfL);
  - 51% of the residential population living within an area of PTAL between 1 and 1b (defined as 'very poor by TfL);
  - An assessment of journeys between key destinations within LBH between cars and public transport has determined that public transport doesn't provide a viable alternative for the vast majority of trips with:
    - 89% of trips are quicker by car than public transport;
    - 84% of journeys are 10 minutes quicker by car than public transport;
    - 71% of journeys are 20 minutes quicker by car than public transport

## Summary (3)

- An assessment of 2,506 Points of Interest within LBH has determined that:
  - 46% of all Points of Interest within LBH are located in area of a PTAL of 2 or lower;
  - 86% of all Points of Interest within LBH are located in area of a PTAL of 3 or lower;
  - 89% of all Shops are located within a PTAL of 3 of lower;
  - 76% of all Restaurants are located within a PTAL of 3 or lower;
  - LBH has a significantly higher number of Points of Interest that are located within a PTAL of 3 or below compared to the remainder of London and the lowest number of Points of Interest located in areas of PTAL 4 or above.
- The availability of public transport and the location of Points of Interest in relation to public transport indicates that the use of car is reasonable for the purposes of many trips within LBH.
- Car ownership in LBH is higher than in any other London Borough correlating with the lowest average PTAL;
- An assessment of cars owned vs mode of travel to work with neighbouring authorities (outside of London) indicates that higher parking standards does not necessarily translate to lower car use for work;
- There is not a linear relationship between car ownership, driver mode share and proportion of cars used for work travel indicating that availability of a car does not necessarily result in the use of that car for travel to work;
- Amongst all other London Boroughs LBH has a significantly higher number of residents working outside of Central London
  which is considered to justify greater flexibility for acceptance of car ownership in LBH when compared to other boroughs;
- LBH is the London Borough with the highest amount of residents travelling to work by car reflecting the number of residents that work outside of London and the limited availability of public transport.

Accordingly, without a step change in public transport availability there will always be a greater need for residents to travel by car when undertaking trips within and around LBH in comparison to many other London Borough's. As a result the proposed residential parking standards are considered to be reasonable.