

# Parking Standards and the Delivery of Family Housing Technical Paper

## Introduction

- 1.1. On 13 March 2020 the Secretary of State wrote to the Mayor of London following submission by the Mayor of his Intend to Publish London Plan (ItPLP). In this letter, the Secretary of State confirmed that due to a number of inconsistencies with national policy and missed opportunities to increase housing delivery he was exercising his powers under section 337 of the Greater London Authority Act 1999 to make a series of directions regarding required changes to the ItPLP. These were set out in an Annex to the letter and included the requirement, at DR9, to delete Table 10.3 of the ItPLP which detailed maximum residential parking standards and replace it with an amended table. The full text of this direction is set out in Appendix 1.
- 1.2. Among the changes within the amended table were the insertion of specific maximum parking standards for family housing (units with three or more bedrooms) in outer London locations with lower accessibility (PTAL 4 and below). The ability for boroughs to consider higher levels of provision for family housing in the lowest accessibility areas (PTAL 0-1) where this would support additional family housing was also inserted. The wording of this amendment was subsequently altered in the Secretary of States further letter to the Mayor of 10th December 2020 to read: 'Boroughs should consider standards that allow for higher levels of provision where there is clear evidence that this would support additional family housing' and this was subsequently reflected in the final London Plan, published in March 2021. The final text of Table 10.3 is set out in Appendix 2.
- 1.3. This technical paper seeks to consider the evidence for the use of this flexibility in Bexley's Local Plan. This technical paper focusses solely on the relationship between higher levels of parking and the delivery of family housing (including the definition of family housing) rather than considering the transport case for greater parking provision which is undertaken in the Council's Local Plan Transport Assessment (LPTA).

## The evidence base

- 1.4. In considering whether there is justification for higher levels of parking provision the primary consideration, as set out in the published London Plan, is whether there is **clear evidence** that higher standards would **support additional** family housing. The secretary of state confirmed in his statement of reasons (See Appendix 1) that this would be in the context of meeting identified housing need. The evidential requirement, therefore, appears to be that, firstly, there is an identified need for family housing in the borough and secondly that higher parking provision obviously and unambiguously helps in the delivery of such housing.
- 1.5. The policy wording does not make clear if parking should be shown to constitute the *sole or decisive* factor in the provision of such housing, however, given the complexity of the development market and the multiple factors which influence the delivery of homes on any given site, it is considered unlikely that this is the intention of the policy and that the evidence should simply show that there is no doubt higher parking provision is a contributory factor in developers making investment decisions. This is examined further in the section on the delivery of family housing.

## The need for family housing

- 1.6. The Council undertook a local Strategic Housing Market Assessment in 2018 which it updated in 2020 to incorporate revised London Plan targets. The document provides the latest available evidence on housing need within the borough and was informed by a major household survey completed by over 3,400 households, a survey of stakeholders, interviews with housing professionals, estate and letting agents and a review of secondary data. In considering the type and mix of dwellings appropriate for the borough it analysed household projections and data on the relationship between households and dwellings indicated from the household survey. Table 1 below summarises the confirmed appropriate housing mix.

Number of bedrooms	Market	Affordable Rented	Affordable intermediate	All Tenures
1	5.7%	18.6%	12.8%	9.6%
2	32.0%	59.3%	42.7%	39.8%
3	41.1%	17.3%	34%	34.5%
4	21.1%	4.9%	10.5%	16.1%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

Table 1: Housing Mix (Source: Bexley SHMA 2021)

- 1.7. There is clear evidence of a significant need for family housing in the borough to 2038 across all tenures. Dwellings with three or more bedrooms account for over 50.6% of the mix generally and 62.2% of the market need. This is an increase from the previous 2014 SHMA which indicated a 33% requirement for 3+ bedroom houses across all tenures.
- 1.8. The question of the extent to which families will consider properties with less than 3 bedrooms as an acceptable choice of accommodation is an important one as although the flexibility to increase standards in table 10.3 is only applied to 3-bedroom properties, the Secretary of State's intention was clearly to ensure that the need for family housing is addressed and that the negative impacts of on street parking are avoided. If there is local evidence of a reliance by families on smaller properties, particularly with 2-bedrooms, and an indication that under provision of parking there would both affect demand and supply and lead to transport issues there would be grounds to consider a locally specific approach.
- 1.9. Analysis within the SHMA concluded that nearly 45% of households in the borough are families either with dependant or adult children. Of these some 18.3% are in housing need which is a higher proportion compared to all households (13.9%).
- 1.10. The Bexley SHMA, in considering an appropriate mix of housing, concluded that there was a high need for 2 bed properties generally. The baseline analysis of housing mix and projected household change suggested the need for the proportion of 2 bed properties to be 23%. However, this increases to 37% when aspirations are taken into account and increases further to 45% when households were asked to indicate what they would accept. It is, therefore, clear that 2 bed properties are a popular 'default' property type in a constrained market.
- 1.11. The research shows that this is driven by two main issues – families settling for smaller properties due to a lack of access to larger homes but also older residents settling for larger accommodation than they need due to a lack of smaller purpose build older persons housing. The demand from

families is confirmed by analysis of property preference types which shows that 1 and 2 bed units would be preferred by 11% of families looking to move in the next 5 years but accepted by 22% (Table 7.1, Bexley SHMA, 2020). This equates to over 1900 households which is just short of one fifth of all households who would accept this type of accommodation when they moved next (Table 8.5, Bexley SHMA 2020). Although a sizable proportion of available 2 bed units are, therefore, likely to be sought by families a significant majority will be taken up by other sorts of households. In this context it is not considered that 2 bed units can reasonably be considered family housing for the purposes of a parking management policy approach.

## The delivery of family housing

### Developer and Agents Surveys

- 1.12. In order to understand the importance of parking in the delivery of family housing in low accessibility areas the Council contacted 58 local estate and letting agents, 18 private residential developers active in the borough over the last 5 years and the six largest registered providers in the borough. They were each invited to fill out a bespoke survey questionnaire which gathered information on their experience of parking and development issues.
- 1.13. The agent questionnaire asked them to explain their understanding of their clients parking requirements for family housing in areas with different accessibility levels and their view of the importance of parking in their clients purchasing decisions. The questionnaire also set out the maximum parking standards in Table 10.3 of the London Plan and asked agents how important they thought having flexibility to increase these standards would be in making family housing more attractive to their clients. The full questionnaire and results are set out in Appendix 3 to this technical paper.
- 1.14. Some 19 responses were received from agents equating to a response rate of 33%. On the issue of the importance of off-street parking to client decisions about purchasing family housing, responses suggested this was very or fairly important (the top two in a five point scale from very important to not important) irrespective of the level of accessibility. There was a slight increase in importance in areas of 'fairly' or 'moderately' good accessibility (defined in the questionnaire as areas within certain walking distances of stations and town centres) at 78% and 76% respectively but even in areas of very good accessibility, 72% of agents considered parking to remain a highly important factor.
- 1.15. On the question of the level of parking sought, 2 bed properties were thought to predominantly require 1 parking space, although 2 spaces were increasingly sought in areas of lower accessibility (44% of agents indicated this requirement in areas with moderate accessibility). For 3 bed properties 2 spaces were most often cited as preferences across all accessibility levels, ranging from 47% in very well-connected areas to 59% in fairly well-connected areas. A third of agents suggested that 3 spaces would normally be sought for 3 bed properties in areas of moderate accessibility.
- 1.16. In terms of flexibility in local policy to allow higher maximum standards for family housing, 79% of agents considered this to be very or fairly important in making properties more attractive to clients whilst only 10% suggested it was not important.
- 1.17. The developer questionnaire was similar to that of the agents' but an additional question was asked about the level of importance to their investment decisions about family housing their being able to reflect their customers parking needs was. The full questionnaire and responses are set out in Appendix 4 to this technical paper.

- 1.18. Five responses were received from developers equating to a 27% response rate. On the issue of the importance of off street parking to customer decisions about purchasing family housing the responses were similar to those of the agents with the issue being seen as very or fairly important in all circumstances. There was, however, a clearer distinction as accessibility increased with 60% of developers signalling its high importance in areas of very good accessibility increasing to 100% in areas of moderate accessibility.
- 1.19. Car parking levels for different property sizes in different areas again showed 1 space being sought for 2 bed properties across all accessibility areas, although 50% of responses indicated that in moderately accessible areas 2 spaces are favoured. For 3 bed properties, 2 spaces were again considered to be favoured across all accessibility scenarios.
- 1.20. Developers confirmed that the parking needs of customers were very or fairly important to their decisions about how much family housing to provide. The level of importance was seen to rise with reduced accessibility, 100% of respondents confirming that parking was very or fairly important to their decision making on family housing provision in areas of moderate accessibility.
- 1.21. In terms of flexibility in local policy to allow higher maximum standards for family housing, 100% of developers considered this to be very important in making properties more attractive to clients.
- 1.22. The registered providers questionnaire focussed on parking issues that arose during the development and design stage and then subsequently when the parking was managed. It also asked about whether issues varied between tenures and how planning policy could be changed to mitigate issues. The full questionnaire and responses are again set out in Appendix 5.
- 1.23. In terms of parking issues, at the design and development stage a variety of matters were identified however a recurring theme was the cost of providing parking, particularly through podium or undercroft and its impact on design. Post development the main management issues seem to be inconsiderate parking and associated issues of damage and inconvenience as well as concerns around anti-social behaviour and security. There did not appear to be a significant difference in these issues between tenures although the cost of maintaining the parking was flagged as a concern to freeholders and leaseholders.
- 1.24. When asked to comment on what changes in policy might help with these issues, the most popular solutions were greater flexibility in varying parking numbers (up or down) in different areas and improving infrastructure for active travel.
- 1.25. The above results provide a clear picture of the importance of adequate parking provision to family housing both from the agents who are selling the units and the developers who are building them. The developers who responded are clear that their ability to meet this need is highly important to their decisions about whether they deliver the housing in the first place. Both developers and agents are also definitive about the importance of having local planning policy that enables higher maximum standards and have provided an indication of the levels of parking their clients seek, which is above and beyond the current maximums in the London Plan. Registered providers are clearly concerned about the cost and design impact of parking but have confirmed they experience issues related to inconsiderate and unauthorised parking likely linked to inadequate and/or poorly designed parking. They have again confirmed that a more flexible, local policy approach would be beneficial.

Molior Research

- 1.26. The Council commissioned Avison Young to collect and review data from the Molior database so as to establish available evidence on the characteristics of family housing and its associated parking provision in and around the borough over the last 5 years. Qualitative data was also gathered through conversations with sales offices in major developments within the borough. Their full report is provided at Appendix 6.
- 1.27. In terms of the location of family housing in the study area, the data confirms that the majority of developments delivering high proportions of family units are in locations with low PTAL (0-2). The data set also shows that developments in PTAL areas of 2 are delivering an average of 74% 2+ bedroom units, whilst for developments in PTAL 1 this increases to 81%. This would suggest that more restrictive parking approaches (and associated requirements for higher density) in areas of high accessibility are an influencing factor on the level of provision of family housing. Figure 1 below illustrates this trend. Although this evidence counts 2 bedroom units as family housing, if these are removed from the calculation it can be seen that developments in PTAL 1 and 2 provide an average of 36% 3+ units whilst developments in PTAL 3 to 5 deliver an average of only 16% (See Table 2).

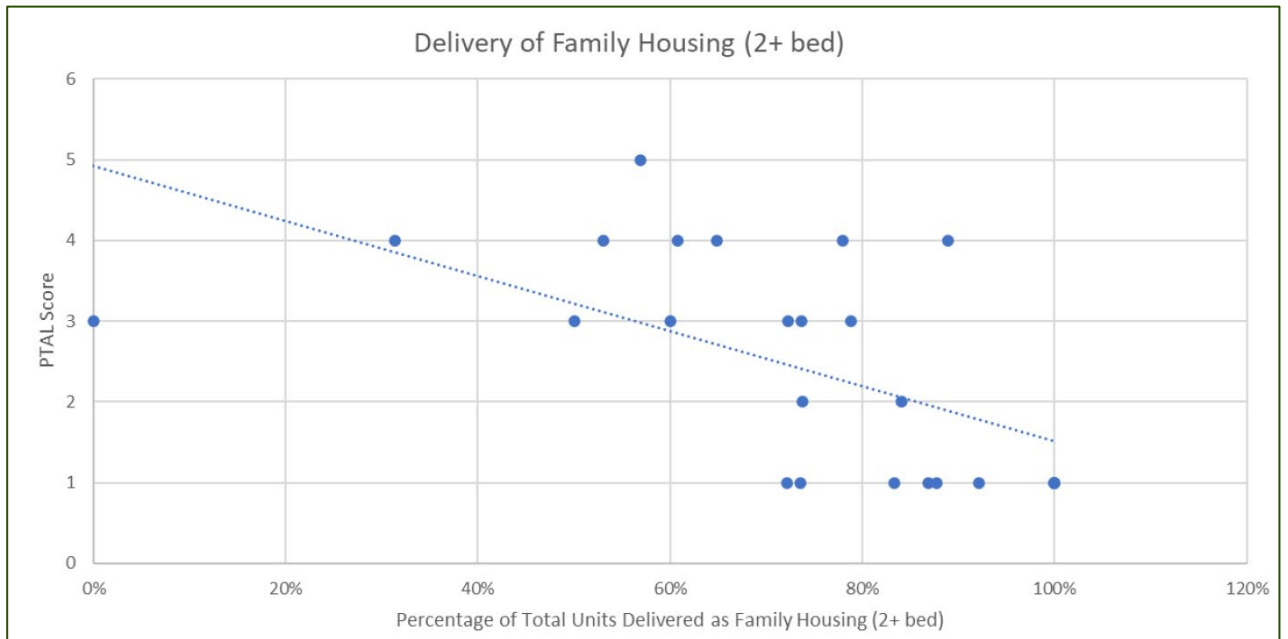


Figure 1 : The relationship between family housing provision and PTAL (Source: Avison Young Report 2021)

PTAL Level	Total Units	Total 3+ bed units	Ave % of 3 + bed units
1/2	2521	917	36%
3/4/5	1668	268	16%

Table 2: Parking provision for family housing (source: Avison Young Report 2021)

- 1.28. An analysis of the level of parking provision within these developments also suggests that developers are providing very close to the maximum standards identified in the new London Plan with average provision of 1.42 spaces and 0.69 spaces per dwelling for PTAL 1 and PTAL 2 areas respectively. If it is considered that these averages incorporate 1 and 2 bed properties as well as family units it is clear that developers are seeking to provide parking beyond that allowed for in Table 10.3.

- 1.29. Quantitative evidence on the relationship between lower parking provision and sales rates is not conclusive. Avison Young, however, confirm that sales rates depend on a number of factors such as marketing, location and general desirability of the development and that the overall picture in this regard is complex. However, a clearer picture is provided from the qualitative evidence. Such evidence suggests that demand is driven by owner occupiers in the study area rather than investors. Generally speaking owner occupiers are more concerned about parking provision, particularly in low accessibility areas.
- 1.30. Discussions with the sales suite at a major development site at Erith Quarry (known as Erith Hills) suggests that the amount of parking offered for larger units is a factor for buyers as demand is driven by families with children who are reliant on cars to travel. Moreover, where parking is restricted, householders simply utilise free parking in the local area, even where developments sit within CPZs. This would seem to support the positive relationship between the desirability and saleability of family housing and adequate parking provision and the link between inadequate provision and increasing on street parking stress.

## Conclusions

- 1.31. This technical paper sought to consider the evidence available with regard to the relationship between greater parking flexibility and the delivery of family housing with a view to reaching a conclusion on whether there is sufficient justification to promote a locally specific policy in line with Table 10.3 of the London Plan (2021). It also sought to consider the definition of family housing as set out in the London Plan.
- 1.32. A range of quantitative and qualitative data has been collected and set out in the technical paper and the attached annexes. It confirms that there is a significant need for family housing in the borough and that this is focussed on units of three or more bedrooms. It is therefore concluded that there is a justification for considering ways of enhancing the delivery of family housing through greater parking provision in the light of this demand and that this should encompass the delivery of 3 or more bedroom properties.
- 1.33. The evidence also confirms through surveys of agents and developers operating within the borough that parking is a consideration of some importance when people purchase or rent family housing and that requirements are predominantly for a single space for 2 bed properties and 2 spaces for 3 bed properties irrespective of the accessibility of an area. Developers have also clearly stated that their ability to meet buyers parking needs is a key driver in their decisions around whether to provide family housing on developments whilst developers and agents have also strongly endorsed the importance of a flexible local parking policy in making family housing more attractive to purchasers.
- 1.34. The focus for the delivery of family housing is seen to be in lower PTAL areas (0-2) and developers are currently averaging provision very near the maximum standards in recent development. Demand is driven by owner occupiers rather than investors, increasing the importance of parking provision. Where parking is restricted it is also evident that purchasers will park on street rather than reduce car ownership.
- 1.35. It is therefore further concluded that there is clear evidence that a local parking policy which allows for higher levels of provision will support the delivery of additional family housing and that this would be material not only to those areas of very low accessibility but to other areas as well. In this context a locally specific policy is proposed which: increases maximum standards, potentially

included areas of PTAL 2 and incorporates units with 3 or more bedrooms. The degree to which these maximum standards should be increased is considered in Chapter 7 of the LPTA.

## Appendix 1: Secretary of State's Direction, March 2020

DR9

Table 10.3

Delete Table 10.3 Maximum Parking Standards and replace with the table below:

Location	Maximum Parking Provision <sup>1</sup>	Number of Beds
Central Activities Zone Inner London Opportunity Areas Metropolitan and Major Town Centres All areas of PTAL 5 – 6 Inner London PTAL 4	Car free <sup>2</sup>	N/A
Inner London PTAL 3	Up to 0.25 spaces per dwelling	N/A
Inner London PTAL 2 Outer London Opportunity Areas	Up to 0.5 spaces per dwelling	N/A
Inner London PTAL 0 – 1	Up to 0.75 spaces per dwelling	N/A
Outer London PTAL 2-4	Up to 0.75 space per dwelling	1 – 2
Outer London PTAL 2-4	Up to 1 space per dwelling	3+
Outer London PTAL 0 – 1	Up to 1.5 spaces per dwelling	1 - 2
Outer London PTAL 0 – 1	Up to 1.5 spaces per dwelling <sup>3</sup>	3+

The parking standards set out in the ItP London Plan are inconsistent with national policy. The 2016 Minor Alterations to the London Plan introduced parking standard for residential policy to meet the requirements as per the Written Ministerial Statement of 25<sup>th</sup> March 2015 that 'clear and compelling justification' is required when introducing parking standards.

The Mayor has not submitted clear and compelling evidence that the policy from the 2016 MALP should be changed, so provision has been made to allow boroughs to support higher levels of provision where this meet identified housing needs, the approach to lower PTAL Outer London areas has been made more flexible and parking and parking requirements for family housing in Outer London have been differentiated

Reducing parking spaces for homes risks residents being forced to park on street and causing congestion to London's road network and adversely impacting on the cyclability of the roads in outer London. It also fails to reflect the need future housing will have to provide electric charging points to meet the Government target of only electric vehicles being available from 2035.

<sup>1</sup> Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed.

<sup>2</sup> With the exception of disabled persons parking, see Part G Policy T6.1 Residential Parking

<sup>3</sup> Boroughs should consider higher levels of provision where this would support additional family housing.



## Appendix 2: Table 10.3, London Plan 2021

Location	Number of Beds	Maximum Parking Provision <sup>1</sup>
Central Activities Zone Inner London Opportunity Areas Metropolitan and Major Town Centres All areas of PTAL 5 – 6 Inner London PTAL 4	All	Car free <sup>2</sup>
Inner London PTAL 3	All	Up to 0.25 spaces per dwelling
Inner London PTAL 2 Outer London Opportunity Areas	All	Up to 0.5 spaces per dwelling
Inner London PTAL 0 – 1	All	Up to 0.75 spaces per dwelling
Outer London PTAL 4	1 – 2	Up to 0.5 - 0.75 space per dwelling
Outer London PTAL 4	3+ <sup>3</sup>	Up to 0.5 - 0.75 space per dwelling
Outer London PTAL 2 - 3	1 - 2	Up to 0.75 spaces per dwelling
Outer London PTAL 2 - 3	3+ <sup>6</sup>	Up to 1 space per dwelling
Outer London PTAL 0 – 1	1 - 2	Up to 1.5 spaces per dwelling
Outer London PTAL 0 – 1	3+ <sup>6</sup>	Up to 1.5 spaces per dwelling <sup>4</sup>

<sup>1</sup> Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed.

<sup>2</sup> With the exception of disabled persons parking, see Part G Policy T6.1 Residential Parking

<sup>3</sup> When considering development proposals that are higher density or in more accessible locations, the lower standard shown here should be applied as a maximum

<sup>4</sup> Boroughs should consider higher levels of provision where this would support additional family housing.

## **Appendices 3 to 6**

Documents available as separate download.