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1 *Executive Summary*

Parking is an important issue in the South East. It is an important determinant of travel choices, and it is a major user of land. National policies on parking provision in new development schemes need to be interpreted clearly at the regional level, especially if local authorities are to achieve a consistent approach across the region.

To address these issues, the Government Office for the South East, together with the Department of the Environment, Transport and the Regions, commissioned research from consultants Llewelyn-Davies and JMP. This summary describes the main findings and conclusions about:

- current practice and the need for reform;
- the recommended approach;
- expected responses and impacts;
- consequential changes and relationship with other policies.

It should be noted that all conclusions refer to non-residential development and to parking for non-operational purposes (including customer, employee and visitor parking) unless specified.

1.1 *Current practice and the need for reform*

Government policy guidance relating to the use of parking standards as a traffic demand management tool is not reflected in the majority of standards adopted by local authorities in the RPG9 area.

Currently adopted parking standards do not, in general, support the locational policies in Development Plans, as required by PPG13 (paragraph 4.4). Specifically, by both allowing and requiring full car parking provision in out-of-centre developments, they encourage development out of centres and away from places accessible by non-car modes of transport. This is contrary to the sequential test and other national Guidance, and local policies based on Guidance. Development control practice is also invariably out of step with Guidance.

In local authorities where standards have been or are being revised after the publication of PPG13, there is some recognition of the aims of restraint-based

parking standards, but only tentative measures for achieving them have been taken. Local planners seem very unclear about the meaning of certain terms used in Guidance; for example “operational parking” is poorly understood.

Where local authorities *have* adopted restraint-based standards, these have mostly been confined to town centres. In a few cases, restraint based standards are related to area characteristics. There is little evidence, however, that such revised standards will actually result in significant mode shift away from the car.

The adoption of maximum parking standards does not necessarily mean that they conform to the requirements of PPG13. Maxima based on “demand” levels will have little if any impact on traffic generation or mode split unless actual provision is well below the maximum. The same applies to maxima that relate only to on-site provision (rather than to overall levels of provision), which would result in a shift only of parking location, not of mode.

Moreover, demand levels for most land use categories are frequently over-estimated, resulting in parking provision well in excess even of peak time demand. Considerable reductions compared with present norms of provision will therefore be needed in order to prompt any mode shift away from the car.

Advice in the present RPG9 refers to the use of parking standards to influence traffic growth and discourage car use in congested centres, but PPG6 and PPG13 currently provide more specific guidance. Since regional guidance is intended to elaborate national policy, there is a strong case for sharpening parking guidance in a revised RPG9.

RPG3 (for London) was produced after the revised PPG6 and PPG13, and contains restraint-based recommended standards. However, these also are not being applied at Borough level in Outer London, primarily because of concerns that restrictive parking standards will encourage business and development to move away to authorities outside Greater London where fewer restraint-based standards (currently) apply. The revised RPG9 should tackle this issue head-on.

1.2 *The recommended approach*

The recommended approach consists of an integrated parking and location policy, and a set of considerations for ensuring compliance amongst local authorities in the region.

The essence is the specification in Guidance of different types of zone on a consistent basis across the region. The zones would form the basis for both development location policy and determination of maximum parking standards. This is expressed in a single matrix showing the appropriate treatment of development applications, including the parking component, for each zone. The matrix is illustrated in Figure 1. The zone characteristics and their relationship with the Use Classes Order are shown in Figures 2 and 3 respectively.

The parking standards for new non-residential development would be maxima related to gross floor area (GFA), implying varying levels of restraint of car access. For simplicity, these are expressed as maximum car spaces per 1,000 m² of GFA.

The standards should be related to the scale of development and the type of user. This allows greater emphasis to be given to the trip-attracting characteristics of a development, rather than simply its position in the Use Classes Order. It is recognised that this marks a significant departure from established practice; but it is more closely in tune with the shift towards accessibility as the prime determinant of parking, as opposed to considerations solely of traffic capacity and circulation.

Some restraint of residential parking is also recommended in locations with good access to facilities and to public transport. This is also included in the matrix.

There should be no variation in the standards adopted for each zone category, as between different parts of the South East region, and zone boundaries should be determined using common criteria. Variation at the local level will, however, result from the autonomous definition of zone *boundaries* by each local authority, to be incorporated in the appropriate Development Plan. Within the overall policy framework, local authorities could also determine parking provision in small-scale developments.

The study's findings on the relationship between Guidance and actual practice at local level indicate that it will not be enough to revise RPG9. It will also be vital to improve mechanisms for ensuring local authority compliance with national and regional policy. Several possibilities are suggested, including

- strengthening Guidance as a consideration in the determination of planning applications;
- linking compliant parking standards to criteria for funding via Transport Policies and Programmes (TPPs); and
- more active involvement of the Regional Office in monitoring and directing Development Plans and major development decisions.

1.3 ***Expected responses and impacts***

The high levels of over-provision of parking found in most recent developments in the region mean that parking requirements will henceforth need to be set at levels well below the current norms.

Restraint standards of this kind, which would be effective in meeting the policy objectives in national guidance, will be likely to set in train a preference for more central locations, together with a revision of development products that will be viable with less reliance on car access.

Since the policy will apply only to new development proposals, and not to existing developments or those with outstanding permission, the policy will not result in car access being withdrawn, but will help to suppress the attraction of new car traffic.

It cannot be stressed too strongly that consistent application of both the parking standards and the location policy will be essential, otherwise competition between authorities (to “undercut” each other’s policy requirements and thereby attract footloose development) will continue, and could even worsen.

1.4 ***Consequential changes and relationship with other policies***

Commuted payment, in lieu of parking not provided on site, is an established practice. It is not necessarily compatible with restraint-based (maximum) parking standards and does not readily translate to payment for non-parking purposes. It should be subjected to a thorough review covering the commuted payment system itself, other payments via planning obligations and S106 agreements, and other

transport funding mechanisms. Such a review should aim to clarify the current legal position, and define changes in statutes required.

The amount of parking to be incorporated into a development should always be detailed on the planning application form and on the decision letter. This would ensure that the provision is included in the monitoring and enforcement system.

2 *Context*

2.1 *General*

In December 1997 the Government Office for the South East (GOSE) and the Environment, Transport and the Regions, commissioned Llewelyn-Davies with JMP consultants to review parking standards in the South East. This is the final report of the research undertaken. The findings and recommendations will inform the preparation of revisions to Regional Planning Guidance for the South East (RPG9), due in 1999.

The work focuses on car parking (rather than parking for bicycles, lorries or other categories of vehicle), which is considered to be the area of parking policy that is most contentious, and most complex. Regional guidance is considered to be less crucial for other aspects such as cycle parking and provision for people with disabilities.

2.2 *Definitions and interpretations*

The study process has revealed ambiguities in the use of some terms associated with parking policy. We therefore attempt to clarify the position at the outset.

New Development

This carries the definition as set out in Section 55 of the Town and Country Planning Act, 1990 and includes change of use. The word “development” on its own may, depending on context, refer to existing buildings or uses, as in general parlance.

Maximum standards

This is interpreted as meaning a ceiling or upper limit on the level or rate of provision that can be made. It also means that provision lower than this ceiling is desirable in all circumstances, and the lower the provision, the more desirable in policy terms. (This does not mean, of course, that lower levels are necessarily more realistic or feasible, otherwise all standards would be set at zero!)

Demand and Demand-based

This refers to parking demand that would or could arise in the absence of any deterrents such as parking charges and controls, or restrictions on supply. In reality there are always deterrents of some kind, so the interpretation relates more to deterrents *relative* to the norm in the South East context rather than to demand in the strict sense of economic theory. The term “unfettered demand” is also used in this report, and means the same thing. There is also a connotation in this report of a “demand” level which might act as a reference point against which to compare restraint-based parking (see below), but it is important to note that existing so called demand-based standards (used in the South East and nationally) appear to have resulted in over-provision of parking at most new developments (except B1). Actual demand levels can be assessed on the basis of car park accumulation data for existing developments.

Restraint-based

This refers to a standard or level of parking provision that assumes or matches a mode split with a smaller car share than that implied by a “demand” level. It is important to note that parking for less than 100% of peak time users does not in itself constitute a restraint-based level; account must be taken of alternative sources of parking and also of car occupancy rates.

Operational parking

Different interpretations of this term are to be found, with potentially radically different outcomes. Our understanding is that “operational parking” originally referred to vehicles necessary for the operation of an activity, primarily vehicles bringing goods to and from, but possibly also including cars of personnel whose main work was in the vehicle. This is our preferred interpretation.

Some local authorities and developers, however, include customer and visitor parking in the “operational” category. This implies that parking for such users is essential to the access requirements of the activity. Conversely, non-operational parking is regarded as employee parking, with the pejorative connotation that this is less essential or undesirable, perhaps by virtue of it involving long-stay parking in valuable locations. We reject these interpretations, especially where they are used as a justification for resisting restraint-based parking standards. Thus we exclude

from our definition of operational parking that which relates to customers and visitors as well as employees, though employees whose main work is in the vehicle may be included

Operational need

Reference is sometimes made in the literature to operational needs. We believe that the word “need” is too extreme for practical use in the context of parking policy. Car use and car dependency may be widespread, but this does not convert them to the status of needs. A distinction must be made between needs and habits. Neither carry any pejorative weight in terms of what may be tolerable or desirable.

Development product

Developments may be described not only by the use to which they are put (and as classified in the use classes order), but also according to a variety of other characteristics. These might include, for example, the scale of the activity, the area served, characteristics of the population to be served (car ownership, income, social group etc.), dependence on mixture with other activities. The term “development product” is used in this report when referring to the generality of such aspects. It is of particular importance in the context of conclusions about the need for changes in development product for parking restraint and location policy to be effective.

3 *Objectives of revised parking advice*

3.1 *Policy Context*

The policy context for the study is the move towards more sustainable forms of development, as expressed in various Government reports and statements over the past decade. These shifts in approach include reducing the need for travel, especially by private car, and promoting alternative modes of travel that have less adverse impact on environmental quality. Particular emphasis has been given to road congestion and road accidents, and in recent years air quality problems have attracted more attention. There are now national targets for reducing the two latter problems, while targets for traffic reduction may soon be devised. Targets are also emerging for promotion of non-car modes, the first for cycling being set under the previous administration.

Car parking is of key importance in the delivery of the new policy agenda, because of its role in determining travel behaviour, and its use of land. Although parking policy must be framed widely in relation to land use and transport considerations, this study is confined to parking standards in new development as a component of regional policy.

3.2 *Problems of current parking standards*

The justification for the land use policies including parking set out in PPG13 and other national guidance relates to the following problems which have arisen from or been aggravated by the application of minimum demand-based parking requirements in new developments.

- Traffic generation including longer distance journeys by car (air quality, environmental pollution, road danger and congestion problems).
- Trip end generation (danger and severance caused by parking acts, and interruptions to footways by car park access roads).
- Car ownership encouragement, especially multi-car households.

- Social exclusion (market segmentation favouring car users; impact on non-car modes).
- Low density development and inefficient use of land.
- Degradation of built form/townscape by parking areas and access.
- Reduction of viability of public transport.

Whilst there have been different interpretations of the policies and intentions of guidance, our own interpretation is based on finding solutions to the above problems.

3.3 *The role of regional guidance*

The research reported here is intended to assist in the preparation of revised regional guidance for the South East, which in turn will need to interpret for the region the policies and objectives expressed in national guidance, especially PPGs 6 and 13. This role needs to be strengthened in the light of strong evidence reported here and elsewhere of the lack of progress locally on the implementation of national policy guidance.

National guidance states that “strategic policies on parking should be included in Regional Planning Guidance and structure plans to avoid the destructive potential for competitive provision of parking by neighbouring authorities”¹. The parking guidance to be included in the revised RPG9 is therefore expected to address the issue of consistency across the region, and also to reflect more strongly than at present the need for local authorities to apply standards that promote the traffic restraint objectives in PPG13 (and PPG6). It is also likely that local authorities will be looking for guidance on how to use parking policy as a tool for implementing their responsibilities under the Road Traffic Reduction Act, 1997, their strategies for decriminalised parking, and their transport package bids.

3.4 ***The aims of revised guidance for the South East***

More specifically, the expected content of the revised parking advice is implicit in the research specification for the project as follows:

- A sustainable response to the pressures of traffic growth and use of land in the South East, through better integration of transport and land use.
- Reduced travel by unsustainable modes.
- Halt the imposition of parking standards that inhibit the intensification of land use, which is needed, for example, to contribute to mixed uses, to town centre vitality, and to minimise land take in the South East.
- Replace demand-based with restraint-based parking standards in the South East.
- Providing more specific and firmer standards than the statements in existing RPG9, to be applied consistently across the region.

The research shows that current local authority practice in the South East is not yet consistent with the objectives of national guidance, which highlights the need for more robust and detailed regional guidance, and local authority compliance with it.

In preparing the revisions, the legitimate concerns of local authorities will need to be addressed. Those expressed during consultations include, in particular, the perceived link between parking and economic viability, especially in areas where economic regeneration is encouraged, and the desire to retain flexibility in negotiating the parking component of developers' proposals. These issues are discussed in Section 4 below.

3.5 ***Criteria for revised guidance***

Further criteria have been developed in the context of the present research in order to test and evaluate the impact of the recommended approach to parking guidance (Section 6). The approach to parking should:

- be sensitive to local circumstances and local political concerns;
- avoid encouraging migration to other areas, regions, nations;
- avoid local authorities being able to poach development by relaxing standards;

- not suppress development, but encourage development of appropriate type and location;
- lead to development solutions that encourage a choice of mode, and hence contributes to its inclusion objectives.
- have data requirements, enforcement and monitoring capabilities which are within reach of and manageable by the local authority; and
- be susceptible to sanctions / incentives to ensure that LPAs adopt and apply standards in line with Guidance.
- take immediate effect.

The next section provides a review of current practice in the region.

4 *Current practice in the South East*

4.1 *Summary*

It might have been reasonable to assume that the publication of PPG13 in 1994 set in train a swift and powerful response from local authorities to revise their policies and practice to curb car-based development, and to promote alternative forms of development product, supported by improved access by non-car modes. Our review is likely to disappoint those who believed this to be the case.

This section reviews current practice in the South East and shows that, with relatively few exceptions, the policy requirements of PPG13 have yet to find expression in development planning practice. There is evidence that the message has not been fully appreciated amongst professionals and decision-takers at the local authority level. Although less clear, it is likely that some decision takers are choosing to ignore the message where it is perceived to conflict with other local priorities. In addition, there is a time lag between publication of Guidance, and adoption of amended policies in development plans. While many authorities in the South East are revising parking standards, the changes made are unlikely to have any significant impact on the level of traffic generated by new development, except perhaps in some town centres. They are also unlikely to cause developers to seek alternative development “products” which can be successful with less reliance on car access.

In terms of parking policy, policy rhetoric is slowly adjusting to the new agenda, but this has not yet been matched by positive changes to development practice. We conclude that while there is a general recognition of the direction in which the wind is blowing, most authorities have yet to set sail.

4.2 *Regional policy and practice*

Guidance on parking at the national level has been available to local authorities for many years, both as a development control tool (following the Town & Country Planning Act, 1947), and as a component of transport planning, especially recently through guidance on the preparation of Transport Policies and Programmes.

At the regional level, however, planning guidance has not generally included parking, although since 1994 the need for it has been made clear². To date, of the 14 regional planning guidance documents, only 4 (including the existing RPG9) include any post-PPG13 reference to parking, and the need for a regional dimension to standards. None of these suggest how such a regional dimension is to be achieved, and only RPG3 for London includes recommended standards for adoption by local authorities.

RPG3 for London authorities provides by far the most explicit and comprehensive example of guidance on parking at the regional level, covering general policy, on-street parking, private off-street parking and park-and-ride. Maximum restraint-based standards are set out for “employment generating” development, as reproduced in Table 1 below, though the term “employment generating” and how it relates to parking is not explained in RPG3.

RPG3 also states that the London boroughs should “develop strategies for parking... in co-operation with neighbouring authorities”³. While consultation with neighbouring boroughs in the UDP preparation process is commonplace, there is little evidence of co-operation in development practice. Indeed, co-operation between Boroughs (and between them and neighbouring South East authorities outside the Greater London boundary) may even be resisted in order to preserve the use of parking as an independent bargaining counter in order to attract development in competition with other authorities.

A further problem related to this is that while the guidance in RPG3 is more specific, and more consistent with PPG13, than current guidance for the other regions, compliance with the recommended parking standards by the constituent authorities is poor, particularly in the outer London Boroughs.⁴ Some, but not all, of this can be explained by the time delay from the publication of Guidance to the adoption of revised local policies.

Despite the ground-breaking regional guidance provided by the 1996 RPG3, there are some conflicts and ambiguities in the document that need to be addressed in formulating revised guidance for the South East.

Table 4.1 Parking standards for employment generating development

<i>Area</i>	<i>One off-street space per m² gross floor space</i>
Outer London	300-600
Inner London	600-1,000
Central London	1,000-1,500

Source: RPG3 (1996) Table 6.1

4.3 ***Local authority policy and practice***

At the local authority level parking standards and policies are made mostly by the County and Unitary authorities. An exception is Buckinghamshire where the Districts set the standards. District councils usually adopt County standards, and some express the view that only the Counties have the necessary expertise to do this. Even so, some variations can be found in the details of standards applied locally. Standards mostly are included as an Annex to the development plan, or as supplementary planning guidance.

The approach to standards for private non-residential parking in new developments is fairly uniform throughout the South East. In the main, developers are required to provide minimum levels of parking on site, related to the gross floor area of the scheme. There are variations in the number of parking spaces required, both for different categories of land use, and between authorities, but exceptions to the concept of minimum provision are rare. The variations between authorities therefore seem to be related to differences in the calculated level of unfettered demand for car use.

Investigation of a number of existing developments built according to minimum standards of parking has revealed that parking provision not only caters for 100% of demand at peak periods, but is frequently well in excess of that amount. We can find no justification for such over-provision, which is both wasteful of valuable development land, and encourages profligate use of the car contrary to policy.

In many of the larger town centres, there are sub-demand standards of on-site provision, and various alternatives in terms of commuted payments for provision

off-site, or to facilitate travel by alternative modes (see section on commuted payments below).

Parking policies in Development Plans adopted by local authorities in the South East do not in general reflect those in PPG13 and RPG9. Moreover, there is little indication that development control practice departs from the intentions of the adopted standards in favour of those in national guidance. The Ove Arup report⁵ on PPG13 implementation confirms that this general finding applies equally well to the country as a whole.

With relatively few exceptions, the policy requirements of PPG13 have yet to find expression in development planning practice. There is evidence that the message has not been fully appreciated amongst professionals and decision-takers at the local authority level. Although less clear, it is likely that some decision takers are choosing to ignore the message where it is perceived to conflict with other local priorities. In addition, there is a time lag between publication of Guidance, and adoption of amended policies in development plans.

One approach (being investigated in Kent) might be to keep parking standards as a Structure Plan matter, rather than incurring the time delay before adoption in Local Plans. But it has been put to us that this could weaken the policy position at District level. Section 54A of the Town and Country Act 1990 requires policies to be in the Plan.

The Planning Inspectorate plays an important role in the interpretation of parking policy when development proposals come to appeal. Consultations have highlighted uncertainties, however, concerning the relative weight that should be given to material considerations, quasi statutory documents, and planning guidance. There are indications that greater emphasis is being given to regional guidance, with GOSE being asked to call in planning applications where parking is an issue.

4.4 ***Recent parking policy revisions in the South East***

Most of the Counties in the South East are producing revised parking standards for private non residential developments, which are claimed to take account of PPG13 policies. These revisions do not seem, however, to result in standards that would restrain or reduce the level of traffic generation, except perhaps in some town centres. The revisions mostly involve converting some former minimum standards

to maximum standards, but since these were derived from calculations of “demand”, they will continue to impose no restraint on car use to new developments.

Moreover, the new maximum standards may apply only to employee parking (e.g. Hertfordshire deposit draft structure plan), with minimum standards still applying to customer parking as well as operational parking.

Counties undertaking revisions mostly state that they have consulted neighbouring counties as part of the process, as required by RPG9.

Three principal departures from the overall pattern of demand-based minimum parking standards can be found in some authorities:

- Lower levels of parking provision apply in many town centres in the region. Policies relating to town centres consist of various permutations of:
 - lower minima or maxima;
 - use of commuted payments or agreements for public parking provision off-site;
 - use of commuted payments for other purposes, such as bus or cycle facilities;
 - requirement for spaces to be publicly available;
 - other parking management requirements as planning conditions.
- In a few authorities, sub-demand levels of provision have been or are being adopted which vary according to different zones identified within their areas (e.g. Isle of Wight, Portsmouth, and Surrey). These zones reflect various characteristics that justify sub-demand levels of provision. This is referred to in this report as the “zonal approach”.
- Some previous minimum standards have been converted to maxima (e.g. West Sussex, Brighton and Hove, and Worthing).
- It is not always clear from County, Local and Unitary plans, when lower levels of provision in town centres are referred to, whether this relates to on-site provision only. This scenario is a pragmatic response to the difficulties of achieving satisfactory development in high density (and often historic) core areas, and results in public provision, or shared provision off-site. This has

been standard practice for many years, and is not a serious addition to sustainable development practice.

PPG13, on the other hand, is concerned with lower levels of provision overall, involving access by modes other than solo driving. Very few Development Plans include such reduced overall provision as an explicit policy, as distinct from policies to provide parking off-site.

Provision at park and ride sites is a variation on the “provision elsewhere” concept adopted for some towns. In some cases this is part of an explicit policy to reduce overall levels of provision in the town centre (e.g. Oxford and Winchester), but in other towns park and ride is seen as a means of increasing overall accessibility by car (i.e. by adding to the total parking stock).

Even where a policy appears to include lower overall levels of parking, the phrasing gives rise to doubt as to the policy intention. One example is reference to lower levels of provision being “acceptable”, rather than being “required” (e.g. West Sussex). Another example is reference to a reduction of the minimum requirement in town centres being “allowed” or “acceptable” (e.g. South Buckinghamshire) rather than being “required” or “desirable”. This gives the impression that the local authority is prepared to respond to developer desires to reduce parking (e.g. for offices in town centres with good public transport), but not necessarily to insist that developers provide sub-demand levels of parking as a contribution to traffic restraint.

We have been unable to find any Development Plan or other parking policy that unambiguously satisfies the following criteria:

- *Maximum standard at below demand level.*
- *No commuted payment or other requirement for parking provision off-site.*

It may therefore be concluded that PPG13 parking policy has yet to be established in planning practice in the South East.

4.5 ***Monitoring and compliance***

The current process whereby parking policy filters down from national and regional guidance to Structure Plans, Local plans and Unitary Plans is very slow, and takes

place with little review of consistency or conformity. National guidelines are not yet available, though research is underway.

Despite the fact that standards are set mostly at County level, only one County reported any attempt at monitoring the implementation of the standards by the District authorities, and then only for schemes where the County was being consulted. It may be that since both County and District councils have (at least until now) pursued the same “demand based” agenda of minimum parking requirements, there has been little point monitoring the activities of different councils. Such monitoring would be important only if there is the likelihood of District Councils implementing standards in a way that would undermine County policy.

It appears that a similar argument applies in terms of the approval and monitoring of Development Plans. Neither the DETR nor the regional Government offices outside London have sought to ensure the conformity of County, Local or Unitary Plans with national or regional guidance in terms of parking policy, though some attempt has been made through the Government Office for London..

Of the few authorities operating sub-demand parking standards, no monitoring data are available on the success or otherwise of the new policies. The Isle of Wight reports positive responses, however, at least in terms of more efficient or intensive re-use of town centre sites.

4.6 ***Commuted payments***

Commuted payments are a very uncertain component of S106 agreements. Firstly, developers seem able to resist such payments, especially when they have a choice as to where to locate. Local authorities appear to find the legal basis too uncertain to press reluctant developers, especially when there are no identified schemes into which the funds generated can be channelled (e.g. Portsmouth). In the Isle of Wight, payments related to floor area rather than parking spaces have given rise to the possibility of legal challenge. Secondly, only a tiny fraction of development applications result in a commuted payment being made, though income in some local authorities is significant. Thirdly, even when successfully negotiated, they may fail to materialise if development proposals are withdrawn.

The success of commuted payments seems to relate to the existence of an overall strategy and specific schemes on which income can be spent, and a sufficiently strong market for developers to respond. The voluntary nature of commuted payments otherwise leaves local authorities in a very weak negotiating position.

Commuted payments are mostly calculated by subtracting the number of spaces provided on site from the demand level (usually the minimum standard set in the development plan). The sums collected per space have historically reflected public car park construction costs, but the use of money for other purposes has led authorities to negotiate on a case by case basis (again reflecting a weak negotiating position, which may be exploited by larger developers).

Logic seems to dictate that commuted payments for off-site parking cannot be applied when standards are converted from minima to maxima. The basis for commuted payments remains, however, if the standard is both a minimum and a maximum, provided, of course, that this is set at a level above the "operational minimum" (see definitions in Section 2). A standard that is both a minimum and a maximum level we may term a "requisite standard". Some authorities collect commuted payments on the basis of the spaces that *would* have been provided if the demand level *had been* required (e.g. Isle of Wight and Worcester). This does alter the concept, however, because the payments are calculated on the number of parking spaces, which have only a coincidental relationship with the cost of alternatives on which the revenue is spent. For example, there is no obvious reason why the cost of supplying access by bus should relate to the cost of providing a car parking space.

5 *Issues for revised parking guidance*

This section discusses issues that have emerged during the study process as having an important bearing on the scope and shape of regional parking guidance.

5.1 **General issues**

To what extent are parking standards and measures to be used to bring about an improvement in development practice?

It will be difficult to justify restraint based standards which are not intended to lead to a significant change in the location, scale and type of developments being proposed. At its simplest, one cannot expect developers to promote car-based developments that do not have unfettered access by car. If such developments are no longer to be accepted, then alternative development “products” must be encouraged.

The new standards must therefore be promoted as a means of influencing the dynamics of planning and development, and of harnessing market forces to deliver the region's sustainability objectives. It is, however, unreasonable to rely solely on parking standards alone to bring about these changes. Since parking is essentially an aspect of accessibility, there will need to be an overarching framework of accessibility standards based on mode split. This is likely to become more pertinent with the adoption of traffic reduction targets.

To what extent can location policy generally, and the sequential test in particular, counterbalance the pressures for out of centre development which variable parking standards based on town centre proximity produce?

In the absence of a national uniform limit on parking provision in new developments, developers will tend to migrate to locations with the least restrictions on parking, i.e. down the urban to rural gradient, and from regions requiring restricted parking to those offering unrestricted parking.

If the parking policy is not to be undermined, this development pressure has to be redirected and counterbalanced by location policy. Our view is that the land use location policy comes first, and provides the framework within which parking provision is decided. It is unlikely that parking policies or standards could ever be

sufficiently robust or enforceable to be the prime determinant of appropriate development, even if such an approach was merited on other grounds.

To what extent can local authorities avoid competition and poaching from other authorities if flexibility in setting standards is allowed?

Outside Central and Inner London, restraint based standards have generally not been adopted, despite the requirement for such an approach in RPG9 and especially RPG3. This is seen as a clear indication that local authorities (whether or not persuaded by developers) perceive restraint as having a negative impact on development.

It seems unlikely that local authorities can avoid competition problems by acting unilaterally to implement restraint, and this highlights the need for consistent standards at the regional (if not national) level. Action may also be needed to prevent local authorities circumventing PNR restraint by building public car parks, for example through scrutiny of TPP annual funding submissions.

What mechanisms can be deployed to ensure compliance by local authorities, and to avoid delays in implementation?

There are several aspects of non-compliance:

- 1 Lack of clarity, and uncertainty about the policy
- 2 Fear of competition from other local authorities
- 3 Perceived link between ample parking and economic viability, and overriding concern to attract jobs in certain areas.
- 4 Traffic generation and car dependence not seen as a problem except in town and city centres, and hence need for policy change not appreciated
- 5 Time lag between the production of Guidance, and incorporation into the adopted development plan

In our judgement, non-compliance is at present influenced by the first three of these factors. Revised RPG9 will need to include not only up-to-date policy guidance, but also a clear indication of how these impediments to compliance can be overcome. Some suggestions are set out in Section 6.3.

What is the interpretation of “operational parking”?

The review of literature and of practice has uncovered considerable uncertainty as to the meaning of “operational” parking, especially in relation to retail and other customer-generating development.

PPG13 states that “standards in local plans should be set as a range of maximum and operational minimum amounts of parking for broad classes of development and location”, and also that local authorities should “ensure parking requirements are in general kept to the operational minimum”.

There is great uncertainty amongst local authorities, however, about whether customer parking is “operational”, and even greater uncertainty about what is a “minimum amount”. As indicated at the beginning of this report, our interpretation of operational parking in this context does **not** include customer or employee parking.

5.2 *Other issues*

- Restraint standards require a method that incorporates off-site parking and non-car access. This goes beyond usual development control practice, but is illustrative of the new approach to integrated transport and land use.
- There is a difference between flexibility to respond to local circumstances and flexibility that is used as a competitive tool. The latter is wasteful and leads to unsustainable development solutions.
- The desire for local flexibility may be a misreading of the true situation, given evidence that developers may be very happy with restraint, provided that this is applied on a level playing field, that is across the region, and beyond.
- Variation between land use types: simplicity argues for broad categories, but implementing new parking standards argues for narrow categories.
- The increased need for CPZs (to avoid problems caused by displaced parking) using the new decriminalised parking offence procedures and local authority responsibility for enforcement. Can these be more easily implemented? Can hours of operation be extended, to reflect range of activity hours? CPZs can produce a relatively secure and predictable source of income for local authorities. CPZ’s can produce a relatively secure and predictable source of

income for local authorities, so there is an incentive for rapid implementation. Public support is necessary, however, and not easily obtained unless on-street parking problems are already experienced.

- Developer contributions to non-car infrastructure are sometimes referred to as commuted payments, but this is confusing, since the payment is not being commuted from one type of parking to another, but is being made for a quite different purpose. Some authorities might argue that commuted payments are more certain than *ad hoc* S106 agreements for non-car improvements, but the latter seem to be more widely used.
- Section 106 agreements can also relate to non-infrastructure matters, including green travel plans. In applying sub-demand levels of parking in new development, local authorities may need to use planning conditions and agreements that address broader questions of access. Such an approach can help developers in preparing viable alternatives to car-based developments, and can be incorporated in Development Plans, as in Nottingham.
- Concern about the negative effects of traffic generation needs to shift from employment and town centre, to all activities and all areas. This more comprehensive view is needed in order to reflect the new environmental agenda, and the reality of more diverse travel patterns. There may be a limit to the usefulness of policies that discourage car use for work purposes, while encouraging its use for other purposes.
- A consideration in developing parking policy is the degree of reliance to be placed on non-planning measures to reduce car use and car parking in new development. While measures such as the mooted PNR tax would have an important bearing on the issues dealt with in this study, it has been assumed in this study that planning policy in terms of the justification for parking and development decisions, will not be reliant on non-planning measures.
- If a zonal approach to parking standards is to be recommended (see Section 6.2), achieving consistency in zone definition will be a key issue. The relationship between zones and accessibility also may not be straightforward.
- The need to achieve parking standards that promote better accessibility by non-car modes, rather than reinforce present patterns of accessibility, should be a key element of revised guidance.

- This issue has been tackled by the use of site area rather than Gross Floor Area in some inner London Boroughs, but this appears to be relevant only where developers themselves wish to increase density without increasing parking. This is less likely to be relevant outside Greater London.
- The requirement for sub-demand parking standards will impose a greater burden of monitoring and enforcement on local planning authorities. This is because developers are more likely to seek to provide more space than allowed under a restraint policy, than they are to reduce provision below the minima currently required by planning authorities. In addition, where the two-tier system exists, Counties will need to ensure compliance of District councils with their new restraint-based policies, and to monitor its implementation.
- Development Plans should incorporate specific standards for cycle and motor cycle parking, and also for inclusion of any special provision for vehicles used by people with mobility difficulties. Guidance should refer to the need for such standards to be included, but need not specify levels of provision. Although important, this component of parking policy is less controversial and less difficult to implement than the matter of car parking which is the central theme of the present report.

6 *The recommended approach*

This section describes in turn three related elements of the recommended approach, namely:

- Parking standards
- Location policy
- Ensuring compliance with the new approach

6.1 *Parking standards*

The approach is to introduce restraint-based parking standards for all non-residential development, with the degree of restraint varying according to a set of criteria related to development type, location and accessibility characteristics. These criteria would be represented by the definition of four zone types.

The aim is to achieve reduced traffic generation rates from developments in town centre and other locations accessible by non-car modes, and to rely on land use location policy to ensure that inappropriate developments do not take place outside these accessible locations.

The basic components may be summarised as:

- sub-demand maximum standards of provision, varied according to broad categories of accessibility;
- these categories given a spatial dimension through the definition of zone types;
- standards related to the development product scale of development and the type of user, rather than use class category;

6.2 *Location policy*

The problems generated by excessive reliance on car access cannot be attributed solely to the application of minimum standards of parking provision over the years, although the curtailment of this practice is necessary to avoid compounding the difficulties. The other side of the coin relates to the car-based development products that have filled the land use planner's in-tray over recent decades, and the location decisions that have allowed such products to emerge.

An important objective is to ensure that planning decisions lead to “the right business in the right place,” to borrow a phrase from the Dutch location policy. This cannot, in our view, be achieved by relying solely on parking standards. Location policy should therefore be strengthened to work in tandem with parking and other aspects of accessibility policy.

It is also necessary, if parking standards are to be varied between different areas, to counter the tendency for developers to avoid in areas with less parking restraint.

The suggested method is to incorporate a **location matrix** in Development Plans. The matrix allows the appropriateness of individual developments to be determined in terms of their scale, type and location. It requires the geographical definition of zones in each local authority area reflecting spatial and accessibility characteristics. These zones would also be incorporated in the Development Plan. The parking policy zones should be those defined in the columns of the matrix.

The matrix may be seen as a strengthening of the PPG6 sequential test, by identifying inappropriate locations and developments. Parking standards (and other transport-related provisions) need to be determined only for developments that passed the matrix test (and the sequential test).

Figure 1 shows the suggested land use location matrix. The columns indicate the basic types of zone that need to be identified in each local authority area. The broad defining characteristics of these zones are also given.

For the specification of parking standards, the rows in the matrix show broad types of development in terms of its trip generating characteristics, rather than its position in the use class order. More explicit criteria for defining the zones and their boundaries are provided in Figure 2. Trip or accessibility characteristics are important in relation to location decisions and the determination of parking provision, but are poorly represented in the Use Class Order. The criteria for zone definition shown in Figure 2 therefore emphasises accessibility aspects.

To assist in the interpretation of the matrix at local level, Figure 3 indicates which Use Classes are appropriate in each zone type. It should be noted, however, that scale plays as great if not greater part

than Use Class in determining the suitability of the development product to a particular location.

More detail is likely to be required, however, to cover certain types of development, for example hospitals, and tourist sites in the countryside. These refinements could be left for determination at the local authority level, within the overall policy guidance. The main bands of parking provision should, however, be included in regional guidance (as in RPG3).

Inclusion of the scale as well as the type of land use is considered to be a vital ingredient, since this is a primary determinant of catchment size and hence mode split. The principle of scale in relation to the area served is an aspect that is likely to require further definition, preferably informed by further empirical studies.

The larger the catchment, the smaller will be the proportion of users who travel by non-car modes. The aim is therefore to encourage developments which draw on catchments served predominantly by walking cycling and public transport and discourages developments with wide catchments that rely heavily on the car for access. The exception is town and city centres and major public transport nodes, where the critical mass of non-residential activity makes large developments/catchments feasible without increasing the share of travel by car.

Small developments, serving local communities, such as corner shops and mini-markets, are actually desirable in all neighbourhoods, to reduce the need to travel. There is therefore no merit in a sequential approach that gives town centres preference over other urban locations.

For some activities such as large industrial, the sequential test would have to work in reverse, with the most favoured sites being away from the higher density centres. Activities which generate significant volumes of operational vehicles, and relatively few person trips, are best located on out-of-town sites related to the main road network (and preferably freight carrying rail and water networks). This is indicated in the matrix.

If exceptions were to be made, allowing development in the shaded boxes of the matrix, these should have parking provision determined as in the nearest specified box to the left.

6.3 *Ensuring compliance with the new approach*

The review of practice in both London and South East regions has found that the mechanism for ensuring that local authorities comply with the approach set out in regional guidance is extremely weak. This has probably contributed to the situation in which local authorities have been slow or even reluctant to comply with policy guidance on parking, and have shown a rather limited understanding of the objectives behind the new policy approach.

If even the current (PPG13 and RPG9) guidance cannot be satisfactorily followed through at local level, there seems little point in strengthening the guidance itself, unless the mechanisms for ensuring compliance are strengthened at the same time.

We have considered various ways in which compliance can be strengthened including:

- planning guidance being given explicit precedence over local policies which do not conform to guidance: this would only take effect at appeals, and would require a consistent approach across the planning inspectorate;
- modification of DETR guidance on the preparation of TPP bids (including package bids) to include a requirement for restraint-based parking standards as part of the demand management policies of transport authorities: this could be implemented relatively easily, probably within the existing legislative framework, and would have the advantage of providing financial sanctions to ensure compliance. Local authorities could still choose not to conform, but would incur financial penalties for so doing. This mechanism would also create a real need for County authorities (as TPP authorities) to monitor District council parking practice.
- a requirement for the Secretary of State to approve Structure, Local and Unitary Plans before their adoption: this would involve a radical change in practice that would be hard to justify on the basis of parking policy alone, though if such change were being considered for other reasons, it would help to resolve the difficulty; (Such Ministerial approval formerly was required, but was removed by the previous administration.)

- clearer direction of the planning inspectorate to ensure compliance of Structure, Local and Unitary plans with guidance on parking: this would be consistent with the shift towards supervision via inspection rather than administrative hierarchy (Children's Act, Education etc);
- local authorities will want to ensure that the value of investment in public transport, walk and cycle facilities is not undermined by inappropriately large amounts of parking in new developments. Unitary authorities responsible for both planning and transport will appreciate this point. Counties will need to ensure that the parking policies of the District Councils in their areas are consistent with their transport investment programmes;
- The parking approach adopted and published in revised PPG9 could be adopted as Annexes in all Structure, Local and Unitary Plans within (say) a year, to ensure that all local authorities comply simultaneously;
- a more active involvement of the regional offices in the Development Plan approval process: this would be consistent with the emphasis being placed on the interpretation of national policy through the RPGs, but again may not be justified in relation to parking policy alone.

All of these solutions require action nationally to bring them about, although it may be possible for GOSE to act unilaterally on the last item. We recommend that consideration should be given to the various possibilities in consultation with the DETR and other regional bodies.

6.4 ***Implications of the recommended approach***

It should be emphasised that the proposed approach is based on national policy already in place, and is intended to secure the better implementation of that policy.

The shift from demand-based minimum standards to restraint-based maximum parking standards is not, however, a simple matter. Indeed, the complexities may go some way to explaining why so little progress has been made to date in implementing this aspect of PPG13 policy.

Some of the more important ramifications of this change are briefly discussed below.

From generous to limited parking provision

The maximum standards shown in the recommended matrix (Figure 1) will result in parking provision in new development that is much lower than current norms. Disregarding recent practice by those few authorities that have adopted restraint-based standards, the matrix standards would be likely to result in parking provision of no more than a fifth in Zone 1 and no more than a half in Zone 2, compared to current norms.

This would be likely to rule out the viability (in terms of car access) of developments such as large scale retail parks, business parks and food superstores, especially those located away from town centres.

From objective calculation to policy judgement

Demand-based standards are subject to objective methods of calculation (using TIAs and databases such as TRICS), but sub-demand (restraint) levels of provision cannot be so determined. In principle the mode split for any particular development and location can be estimated (though methods need to be further developed), but the desired target mode split is more subjective, and will be more a matter of policy judgement.

From on-site parking to area-wide considerations

Once sub-demand standards are applied to a development, the wider parking and access context becomes crucial. Not only must alternative means of access to the car be assured, but also problems created by drivers seeking to park on street must be avoided. The parking guidance therefore needs to be set within the framework of complementary transport measures.

The guidance on these matters will need to take account of the extent to which reliance is placed on parking as a demand management tool. The weaker the restraint element of parking standards, the greater will be the need for land use and transport policies to achieve traffic restraint objectives, and *vice versa*. Our assumption is that land use policy together with transport planning policy should provide the basic framework, with the actual on-site parking requirements forming an output of these broader policy considerations.

From on-site to off-site provision

Apart from the determination of the parking requirement of developments (demand level, less any restraint), there will also be the need to determine how that requirement is to be met, for example, the mix between:

- On site parking for non-operational vehicles
- Public off-street parking (whether funded or not by the development)
- Public on-street parking
- Joint or shared use of private off-street parking
- Take over existing private off-street parking

Guidance could also include policies concerning the type of parking provision, as included in the matrix, for example:

- A presumption against on site parking (apart from operational)
- All on site parking (except operational) to be publicly available and subject to local authority control
- The use of CPZs and physical on-street controls
- Any of these related to the zonal approach

From loose to tight specification of “demand”

The review of parking in existing developments has revealed not only a wide variation in levels of provision in relation to gross floor area, but also an almost universal over-provision in relation to peak levels of demand. This over-provision is wasteful of space, and runs counter to the policy requirement of discouraging traffic growth.

Restraint-based standards should not only be adopted in relation to a percentage reduction from “unfettered demand”, but that demand level itself should be more accurately calculated. Failure to do this will simply

mean that provision is reduced from over-provision to demand-level provision, and the restraint element will be lost.

From hands-off to hands-on monitoring

For the policy to work, it will be necessary to monitor parking provision much more carefully than has become standard practice. Parking provision (and complementary measures specified in planning conditions and agreements) will need to be carefully specified and enforced. County authorities will also need to monitor practice by district councils, and GOSE will need to monitor both policies and practice of all authorities in the region.

Relating parking policy to location policy

The approach requires the specification of zone types, and levels of parking restraint associated with each zone type, and parking provision policies varied accordingly. This should be incorporated as part of the regional guidance. To comply with this guidance, each local authority will be required to divide its area into these zones, to incorporate them into the Development Plan at the first opportunity (and in supplementary guidance prior to this), and apply the appropriate parking standards through the development control process.

The zone types should be standardised throughout the region in order to provide both consistency between authorities, and clarity and certainty for developers. For the same reasons, the broad levels of parking provision appropriate within each zone type should also be included in guidance.

Flexibility for local circumstances, not for competitive edge

The aim has been to keep the matrix and the related parking maxima as simple as possible whilst not losing the restraint effect. Considerable scope is available to local authorities in the definition of zone boundaries and in the refinement of parking standards. Complete flexibility is not considered to be desirable, however, since this would perpetuate undesirable competitive practices, and lead to the same disregard for consistency as still persists in London.

A range of provision within which negotiation takes place will allow some flexibility, but this range must not be so large as to undermine the principle of consistency. The matrix provides a suggested range within which local authorities will decide the maxima for zones in their area.

For individual developments, the parking provision to be negotiated will lie between an operational minimum (excluding all customer and employee parking) to a maximum including parking for all categories of user, but being below the level required to cope with peak levels of unfettered demand. The operational minimum is not included in the matrix, and can be left for local determination.

From isolated parking policy to wider accessibility planning

Each authority will need to have complementary policies concerning the way in which the balance of accessibility is to be made up, including provision for public transport, walking and cycling, the alternative types of parking, and its location and management.

7 *Testing and evaluation of the recommended approach*

The recommended approach to parking and location guidance has been subjected to two tests, the first relating to a number of case study development sites, the second a broad-brush appraisal of possible impacts and responses. The results of these are summarised below.

7.1 *Hypothetical responses: case study development sites*

Two desk-based case study surveys have been undertaken to evaluate the likely impact of the suggested approach. The first of these took 46 existing developments from the TRICS database (including 31 from the RPG9 region) and examined parking accumulation rates and parking provision in relation to gross floor area (gfa).

Avoiding wasteful over-provision

The selected sites generally show a high degree of under-utilisation of car parking provision and, more importantly, at the majority of sites this is the case at peak times. It might be expected that peak demand in excess of supply will occur only at town centre sites, but this occurred at 4 of the 37 out-of-centre sites, as well as 2 of the 9 town centre sites.

Assuming that the survey sites are typical (if not representative) of developments built in accordance with parking standards, we may conclude that there is considerable over-provision of parking for all land use types, except B1, and in all areas, even in town centres. Such over-provision is contrary to the policy objective of limiting traffic growth, and of ensuring efficient use of land that in turn would help to limit traffic demand.

Uncertain demand standards

There is great variation not only in the use of parking space for each of the land use types, but also in the number of car parking spaces that have been provided relative to gross floor area. This appears to be true nationally, as well as in the RPG9 region. This suggests either that parking provision has been decided without reference to calculations of demand, or that calculations of demand have been inaccurate. In the context of minimum standards of provision, which are almost universally applied, either explanation is plausible, with developers and local authorities mostly being unconcerned about over-provision.

The conclusion here is that parking restraint levels of up to 50 percent or more could be applied without, in many instances, having any impact at all on the availability of parking at peak times. If off-peak periods are considered, then it may be seen that even very large reductions in the quantities of parking provided in new developments are unlikely to have any substantial influence on levels of car use or mode choice.

This finding has important implications for the framing of guidance on restraint-based parking. Firstly, if restraint is to be expressed as a percentage reduction on the estimated “demand” level of provision, then in order to avoid wasteful and undesirable over-provision, more accurate calculations of unfettered demand will need to be applied.

Secondly, restraint standards that are presented as a percentage of an unreliable demand level are likely to be ineffective and open to abuse. In order for a developer to secure parking to meet full demand within a planning policy of demand restraint, it could be simple (though disingenuous) to over-estimate full demand in the calculation.

Taking one example of a business park on the edge of Woking (TRICS Site reference SC-02-B-02), parking provision is 600 spaces while peak demand is 450, i.e. 75%. If the development had been subject to a 50% parking restraint policy, an inflated full demand requirement of 900 spaces would have resulted in 450 spaces being provided, sufficient in reality to cater for all demand by car. The claim of 900 spaces might not seem unrealistic, with a resulting floor area per employee of around 25 m².

It is for this reason that our recommended approach includes specific maxima related to gross floor area, for which precludes any possibility of manipulating the demand level calculation.

Hypothetical responses: local authorities and developers

Case study development sites have also been reviewed with a view to estimating the likely outcome if restraint standards had been in place at the time of determination by the planning authority.

The exercise involved a review of data from TRICS/SERPLAN studies from 1993 and 1995⁶, together with detailed consideration of the likely impact of parking restraint on 4 specific sites (2 B1 office developments, 1 food superstore and 1 non-food retail park).

The TRICS/SERPLAN studies of 59 B1 office developments (1993) found that parking restraint was the exception rather than the rule, even though 50% of them were located in town centres. Only 9 of the sites had peak parking demand in excess of supply. An important conclusion was that public transport provision alone (without parking restraint) had little impact on mode choice.

The TRICS/SERPLAN study of 1995 attempted to investigate the impact of parking restraint on mode choice at B1 office developments. It was significant that the 7 Counties had difficulty in identifying sites where parking restraint was known to exist, and only half the target of 28 sites was achieved for analysis. From the analysis it was concluded that limited on-site parking alone (without public transport being available) is unlikely to lead to substantial shifts in mode choice. This assumes, of course, that alternative off-site parking is available.

Retrospective consideration of the impact of parking restraint at 5 specific development sites has prompted the following reflections on **theoretically** possible responses:

Move to more accessible location within the urban area

Choice of a town centre or edge of location is possible. Office developments could move to such sites depending on site availability and accessibility by non-car modes. Retail and leisure uses could also relocate, but economic viability would require a change in development product.

Move to location outside RPG9 region

Most retail and leisure, and many office and industrial developments are tied to a particular local market and would not seek locations outside the region. Financial institutions might, however, adjust their investment portfolios to downplay car-based properties in regions of parking restraint.

Lead to parking overspill onto adjoining streets

This will be an inevitable outcome, and could cause considerable environmental problems, especially in the absence of on-street parking controls. If there is insufficient capacity on street, this will undermine the economic viability of the scheme. Again, the development product would need to have changed to avoid this negative impact. CPZs can remove the negative impact of overspill parking, and could be funded by the development, but this would not resolve the accessibility problem without a change of development product.

Lead to intensification of parking on-site

If spaces on-site are limited, there will be a tendency at peak times for cars to be parked more intensively, perhaps causing unsightly and obstructive parking at peak times. On-site controls can avoid this problem, as for example in retail and leisure developments, but are unlikely to be so easy in car parks devoted to employee parking. Employers may, however, choose to respond to limited parking by rationing according to seniority or need.

Use of alternative off-street parking nearby

In out-of-centre locations there will not usually be public off-street car parks available. There may, however, be other private off-street car parks that can be shared. It was found for example that 60-70% of trips to the Retail Park included in the analysis was accompanied by a visit to adjacent foodstores. Car park sharing will be possible especially if peak times do not coincide (e.g. a cinema and a furniture store).

Cause mode shift

Parking limitation is unlikely to lead to mode shift unless good alternatives are available, and this will depend largely on development product and location. In the cases studied, there was little chance that developer contributions to non-car facilities could have produced

sufficient improvements to overcome fundamental problems of inaccessible locations.

“Green travel” initiatives

For office schemes these could be a way of countering parking limitations, especially if negotiated as part of the planning permission. Ride-sharing, “hot-desking”, provision for cyclists, and employee awareness schemes are examples of initiatives that could be used at the workplace. For retail schemes, green travel initiatives could include home shopping and home delivery schemes, as well as cycle provision. Such responses are already occurring in some locations, but the full potential is as yet uncertain.

7.2 ***Overall conclusions from case study testing***

The overall conclusion is that parking restraint attempted in isolation will be at best ineffective and at worst likely to generate environmental and safety problems both on and off site. Parking restraint will only serve the overall policy objectives if it is accompanied by one or more of the following:

- 1 A change of development product (e.g. a reduction in the scale of development proposals, and the catchment served), and/or
- 2 A change of location such that non-residential development does not occur where access by alternative modes is unavailable.
- 3 Major contributions from green travel initiatives and improved non-car accessibility.

7.3 ***Hypothetical responses: impact on development potential***

The sub-regional dimension

The South East region is not homogenous in its economic, social or political make-up. This has prompted suggestions that a regional parking policy should provide flexibility for local authorities to cope with varied local circumstances, or should itself include sub-regional variations. The basic idea is that parking can affect the development potential of an area, and that local authorities need to be able to offer parking to developers to attract development to areas in need of inward investment.

We have considered the case for such sub-regional variation in parking standards. Our basic conclusion is that there is no substantial case to support such variation. The local authority viewpoint is clear in the present context where unilateral parking restraint would put an individual authority at a competitive disadvantage. But application of a consistent approach across the region would largely remove the problem, since developers would be assessing locations on a common basis.

It is also not clear how generous parking can help employment prospects in areas of economic disadvantage, since those people most in need of jobs will have low rates of car ownership. It may well be argued that benefits of equal if not greater magnitude will arise from parking restraint policies, because they will cause employment-generating uses to locate where access is available by non-car modes.

The urban-rural dimension

In the context of parking restraint, town centres will become a more favourable development location with respect to accessibility criteria, especially for larger employment and customer-generating developments. Such a shift will more readily occur for developments that are not designed for or dependent on car access. Insistence on town centre locations will cause changes in development products coming forward for planning approval, especially changes involving a reduction of scale to better fit with higher land prices and tighter site availability.

At the other end of the urban-rural gradient there will be a suppression of business and commercial development requiring large amounts of labour or customers in edge, fringe, and rural locations where access by bus, walking and cycling is insufficient to meet the shortfall in PNR parking. This suppression is likely to be short-lived, however, and will

lead in the medium and long term to an adjustment of development product and business management options.

Businesses placing a high value on car accessibility for their employees or customers will in the medium to longer term tend to relocate to sites already developed with full parking provision. Businesses occupying such sites, but that have less concern for car access, may over time be able to realise surplus value by selling on to businesses that do.

In the longer term, housing development may intensify close to employment, retail and leisure facilities, and public transport will improve to serve more centrally-located facilities, and these trends could redress the accessibility imbalance of areas where parking restraint causes development suppression in the short term.

Sites at the edge of London and the larger south coast conurbations may be less susceptible to development suppression than sites at the edge of smaller towns, because they have a higher residential density and choice of centres from which to draw labour and customers. This will depend, however, on the quality of access by non-car modes in such areas.

Rural areas will continue to have higher parking allowances, and will thus become attractive as an alternative to areas where parking restraint is applied. Strong application of the sequential test and the location matrix recommended in this report will be needed if pressure for rural car-based development is to be prevented.

The aim will be to prevent the spread of urban lifestyles into rural areas, but to encourage rural self-sufficiency in terms of employment and services.

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¹ PPG13 Transport (1994) paragraph 4.4

² PPG13 Transport (1994) paragraph 4.4

³ RPG 3 (1996) paragraph 6.49

⁴ This has been well documented, most recently in: London Transport Planning, Review of office and retail parking standards in London Unitary Development Plans, London Transport, May 1997. This shows that neither provision of parking at typical office developments, nor the standards included in current UDPs in outer London comply with RPG3 guidance, with parking provision in some Boroughs exceeding the RPG3 maximum level by a factor of 10 or more.

⁵ Ove Arup, University of Reading (1997) Planning Policy Guidance on Transport (PPG13) Implementation 1994-1996, pub HMSO

⁶ (a) SERPLAN (1993) Parking Policies for the South East, pub SERPLAN

(b) JMP Consultants Ltd for TRICS & SERPLAN (1995) Parking and Public Transport - The Effect on Modal Choice