# Parking Standards in the South East Updating RPG9

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#### **Background to the study**

Major revisions to parking policy were heralded in national planning guidance in 1994. Since then local authority practice has been slow to adapt. In particular, parking provision in new developments is intended to be guided by **maximum** rather than the traditional **minimum** standards. Yet four years after the publication of PPG13 Transport, most authorities have not revised their standards, and even where they have done so, the revisions seem to fall well short of what is intended in PPG13. Aware of this gap between policy and practice, the Government Office for the South East (GOSE) and the DETR commissioned Llewelyn-Davies with JMP Consultants to investigate the reasons and to recommend a way forward.

An attempt had already been made to introduce a comprehensive approach to car restraint including parking policy in Regional Guidance for London (RPG3 1994). The parking element, however, needed cross-boundary support of authorities in the rest of the South East, to provide a level playing field for developers and businesses, and local authorities.

In addition, there was growing recognition of parking as a major user of land, and the adverse impact this was having on moving to more sustainable forms of development, together with parking as a key factor in determining mode choice, and hence traffic growth.

All of these concerns could be addressed in the process of updating RPG9, planning guidance for the South East.

#### Minimum parking to maximum parking

Minimum parking standards is an idea whose time has gone. The original context was that new developments should not be allowed to cause problems on the highway caused by on-street parking of vehicles using the site. The requirement of developments to take responsibility on-site for all vehicles attracted to the site therefore became enshrined in planning practice, and largely remains so today.

In terms of the original objectives, minimum off-street parking standards have been successful. But little account was taken of the wider damaging effects of increasing the parking stock. These effects are now, however, demanding a revision of the approach to parking in new developments:

• Traffic generation, traffic impact and longer journeys

- Trip end generation, causing local danger and severance
- Encouragement of car ownership (longer term)
- Social exclusion (developments accessible only by car)
- Inefficient use of land and low density
- Degradation of built form and townscape
- Reduced viability and quality of public transport

# The policy setting

The basis for the study was that the policy context for regional guidance was clear, as provided in PPG13 Transport (1994).

"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" (PPG13 paragraph 4.4).

"Local authorities should

- adopt reduced requirements for parking for locations which have good access to other means of travel than the private car;
- be flexible in the requirements for off-street residential parking...;
- ensure parking requirements in general are kept to the operational minimum;
- not require developers to provide more spaces than they wish..."

  (PPG13 para 4.6; our emphasis)

The crucial issue, therefore, was how to improve implementation. The aims of revised guidance were therefore to:

- Restraint-based, not demand-based parking standards
- Provide consistency across the region
- Provide for better integration of land use and transport
- Take account of knock-on effects of restraint standards

Minister Richard Caborn further had requested that regional guidance be given

"...on the identification of high capacity transport corridors or routes, subregional policies for traffic restraint and the development of alternative modes, together with advice on parking, including a strategic approach to off-street parking standards".

### The project brief

The research project provided a review of existing standards in the South East Region, an investigation of implementation of PPG13 policy (or lack of it), recommendation of a new approach to be applied across the region, and simple testing of this approach using case studies. Llewelyn-Davies were subsequently appointed by DETR to undertaken a wider study of methods for devising parking standards nationally, and this work will inform revisions to PPG13. The updating of RPG9 for the South East therefore provided a useful forerunner to the national study.

# **Existing practice**

At the regional level, planning guidance has not generally included parking, although since 1994 the need for it has been made clear (see above). 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 gives recommended standards for adoption by local authorities.

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 therefore seem to be related to differences in the calculated level of unfettered demand for car use.

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.

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 report on PPG13 implementation confirms that this general finding applies equally well to the country as a whole.

In terms of existing practice, three basic points emerged:

- 1. The policy of reducing parking provision below "demand" standards isn't working;
- 2. Local authorities will not implement this policy unilaterally because of the danger (real or imagined) of losing development to other authorities with less restrictive standards;
- 3. The restraint standards applied in some town centres will have minimal impact on traffic trends, and in any case often pre-dated PPG13.

#### A new approach to parking standards

The basis of the recommended approach was twofold:

- 1. Provide regional maximum levels of parking provision (especially PNR) to avoid the crippling effect of competition between authorities; and
- 2. Combine into a single matrix the basic parameters determining the appropriate level of provision for various types of development.

The key parameters were considered to be:

Location

- Accessibility (especially by non-car modes)
- Development product:
  - scale (of catchment and development)
  - function (local, urban, regional etc.)
  - land use type and class

The level of parking provision in new developments negotiated by local authorities with developers would thus be an **output** from the above considerations, within the maxima set out in regional guidance.

The framework for this process would be a "zone matrix" to be adopted in regional guidance, and amplified by local authorities for incorporation in their development plans or supplementary planning guidance. The matrix is reproduced at the end of this paper.

# Introducing the "zone matrix"

The columns of the matrix represent zones with different levels of accessibility, especially by non-car modes. Zone 1 would typically be a town centre offering a choice of modes, for example having public transport access from a wide area, and/or having a significant population living within walking distance. Zone 2 would be other areas offering good access by non-car modes, such as inner areas or major public transport interchanges, or high density local centres. Zone 3 would be the remainder of built up areas, while Zone 4 would be areas with little or no public transport access, and only small populations within walking distance.

Different types of development product complete the rows of the matrix. Although the Use Classes order has traditionally formed the basis of determining parking provision, the use class categories were not devised in relation to accessibility considerations, and not surprisingly are not entirely helpful in determining parking. Consideration should also be given to the scale of development and its function, both of which will influence the catchment area from which it draws. The catchment area is crucial in terms of accessibility because the larger the catchment (e.g. regional shopping or leisure) the lower will be the proportion of users who can access the site by non-car modes of travel.

The integration of accessibility with development planning means that certain types of development are inappropriate in certain types of location. This is represented on the matrix by blank cells. Thus large-scale employment or retail uses, for example, should not be located in Zone 3 where they would be accessible for the majority of users only by car. For activities that generate large volumes of commercial traffic, such as warehouses and distribution centres, the reverse is true, and the appropriate locations are in relation to freight networks (probably in Zones 3 or 4) rather than town centres (Zones 1 or 2).

Maximum levels of parking are shown in the matrix for medium and large scale developments. For small developments, there is less need to be prescriptive at the regional level. Small developments serve (mostly) local markets or users and are therefore appropriate in any zone in order to reduce the need to travel. Smaller developments can therefore be encouraged through policy, and also by reducing

access-planning requirements, e.g. removing the need for Transport Assessments to be produced, or for developer contributions to be made.

# Implications of the new approach

When parking provision is required below the level of "unfettered demand", two important implications emerge:

- 1. The level of provision can no longer be objectively calculated, and becomes partly a matter of political or professional judgement;
- 2. Parking provision in new developments can no longer be regarded as a self-contained planning matter, but must be negotiated and planned in relation to important knock-on effects, notably:
  - providing for alternative non-car modes of access;
  - encouraging the use of alternative modes;
  - avoiding problems created by displaced parking on surrounding streets;
  - need for more rigorous monitoring and enforcement;
  - need for consistency of standards between authorities.

The maximum parking levels shown in the matrix (5 spaces per 1,000 m2 in zone 1, and 20 spaces per 1,000 m2 in zone 2) represent a considerable reduction on current norms. It is estimated that in Zone 1 provision of PNR would be at around 20% of current "demand" levels, and around 50% in zone 2. It must be emphasised, however, that actual restraint of parking activity would be very much less than implied by these figures. This is partly because of considerable levels of over-provision in current practice, but also because of the fact that demand in many types of development is peaked. This means that reduced provision will in many cases affect users for only a few hours each week, and the response may simply be to re-time journeys to avoid peaks of demand.

Reduced on-site provision will produce diversion of parking demand (depending on the success of measures to reduce demand overall). This could in some circumstances lead to unacceptable problems on the surrounding roads, which was the problem that minimum standards were originally designed to avoid. In the modern policy context of demand management, there will be a need to ensure that undesirable parking onstreet is limited or controlled through a mixture of physical measures (e.g. parking bays and narrower carriageways) and regulations.

Legal on-street controls (CPZs) are less easily implemented in suburban areas than in town centres and inner areas, but large developments in suburban and rural areas will be restricted by location policy.

It will be clear from the above that there will need to be considerable changes in the scale and location of development proposals being brought forward by private sector developers. This has already happened to some degree in the retail industry, with the move away from large out of town foodstores accessible only by car towards more numerous but smaller scale local facilities.

The new approach will in addition make it difficult to produce viable large scale facilities for leisure, employment and other activities attracting people from a wide catchment. Such developments can still be planned, but they will need to be accompanied by major and permanent facilities for access by non-car modes. In many cases it may be cheaper and simpler to develop on a smaller scale in town centre or inner area sites, which of course is precisely what is desired in terms of sustainable development policy.

#### **Conclusions**

- 1. Parking practice is in urgent need of reform;
- 2. There is an overriding need for a regional framework to prevent destructive competition between authorities, and to ensure compliance with restraint policy;
- 3. Parking provision should be at sub-demand levels, and up to maxima specified at regional level;
- 4. Complementary measures should be an integral part of planning permissions, for example relating to access by non-car modes, Green Travel Plans, and on-street parking management;
- 5. Clear signals should be given to the market in order to discourage larger developments in inaccessible locations, and to encourage more appropriate forms of development product.

**END** 

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#### Note

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