

Appendix **C**

CENTRAL BEDFORDSHIRE COUNCIL

PARKING STANDARDS ADVICE

Report

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THE TRANSPORTATION CONSULTANCY

CENTRAL BEDFORDSHIRE COUNCIL

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REPORT

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PREPARED BY:

Transportation Planning (International) Ltd
International Design Hub
Colmore Plaza
20 Colmore Circus
Birmingham
B4 6AT

Tel No: 0121 212 5102
E-mail: info@tpi-world.com

Part of the Amey Group

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1.0 INTRODUCTION

- 1.1 This advice is intended to serve as a critical review of CBC's draft document "Approach to Parking" presented as Appendix F to the Central Bedfordshire Local Transport Plan. The advice concentrates on the subject of parking standards.
- 1.2 Parking standards are inextricably bound up with local transport and parking policy as a whole and, of course, local implementation (through development control) but have been influenced by national guidance in recent years and particularly following the publication of a new version of Planning Policy Guidance - PPG 13 : Transport in 2011. The original PPG 13 was intended to curb the rapid increase of private parking linked to development by specifying maximum standards in order to reduce traffic congestion and encourage the use of the more sustainable transport modes (public transport, walking and cycling). Although the maximum standards for non-residential development set out in the first version of PPG 13 and those in national Planning policy for residential development were never intended to reduce car ownership they were considered in some respects to be over-restrictive and "anti-car". Accordingly, the Coalition Government has revised national policy in relation to setting parking standards to afford Local Government greater freedom and flexibility in this regard.
- 1.3 This advice briefly reviews the overall local transport policy in relation to parking policy and parking standards and includes feedback from recent consultation with local stakeholders. It then sets out a number of different approaches to setting parking standards and advice with regard to the determination and application of standards. The advice concludes with recommendations on the parking standards to be used in Central Bedfordshire.

2.0 LOCAL TRANSPORT POLICY

- 2.1 It is essential that the determination and application of parking standards reflect and support the overall transport policies that form the basis of the adopted Local Transport Plan 3 (LTP3). LTP3 was adopted in April 2011 and applies to the period 2011 to 2026. There must be consistency and clarity in the application of standards to support the development process and to minimize potential misunderstandings, disputes and delays.
- 2.2 The LTP3 in its turn has to support the vision of the Sustainable Community Strategy. This vision is to ensure that Central Bedfordshire is ***“globally connected delivering sustainable growth to ensure a green, prosperous and ambitious place for the benefit of all”***. Incorporating this vision into local transport policy essentially means that transport planning, management, infrastructure (including parking) and services must support the economic objectives (whether growth, regeneration or conservation) of the area's towns and villages in a manner that respects the natural environment. With regard to parking policy and standards, the relevant objectives of LTP3 are;
- To encourage and promote sustainable travel modes and help reduce reliance on the private car
 - To enhance the built and natural environment (e.g. by reducing the amount of land required for parking and by improving the look of streets through better off street provision and the enforcement of parking contraventions)
 - To meet residents' needs for car parking near their homes thereby giving residents a fair opportunity to park within the streets where they live
 - To reduce wasteful competition between towns in the wider sub-region (e.g. by setting car parking charges and standards that are broadly consistent with neighboring authorities yet take account of the financial viability of individual town centres)
 - To make Central Bedfordshire a safer place (e.g. by ensuring that car parks are “safer by design”)
 - To provide access to key services and facilities for special needs groups and the mobility impaired (e.g. by providing appropriate Blue Badge car parking spaces)
- 2.3 Whereas a number of these objectives imply the achievement of plentiful parking (in relation to demand), they do not of themselves encourage or promote sustainable travel modes or necessarily enhance the built and natural environment. This is an extremely common policy dilemma faced by Local Authorities particularly where there is a high dependency on private transport as is the case in Central Bedfordshire. It is also a dilemma for Central government. The recommended approach both for local transport policy and for parking policy is therefore to seek a balance between supporting economic growth and encouraging the provision and use of the more sustainable transport modes.

3.0 THE POLICY CONTEXT FOR PRIVATE PARKING

National Policy- Past and Current

- 3.1 Private non-residential parking (PNR) has increasingly been recognised by transport planners and environmentalists as a problem that needs to be tackled. Even now, after two decades of attempts to reduce PNR – which contributes significantly to peak hour congestion - our towns and cities have similar quantities of public parking and PNR. It took over 50 years to reach the stage where, through a White Paper, Government declared its intention to influence how the **current** supply of PNR is used. PNR was officially conceived through the 1947 Town and Country Planning Act. This Act required developments to provide their own PNR space needs generally within their own boundaries. Almost two decades later, through Planning Bulletin 7 (1965), Government warned of the emerging traffic congestion partly caused by the rapid build-up in PNR and suggested a lower level of provision in certain circumstances. By the mid 1970s some of the metropolitan authorities had reduced PNR standards quite radically in their congested centres, and in London proposals were tentatively but unsuccessfully put forward to reduce the current supply of PNR. During the 1980s the development boom and regeneration objectives often allowed market forces to dictate the provision of new PNR. In the recession of the early 1990s the “competition agenda” developed with a more relaxed attitude to PNR provision being associated with economic advantage. We are now (in 2012) in the midst of another economic downturn with policies on private parking and PNR changing again under the Coalition government.
- 3.2 This introduction to the subject of PNR policies deliberately highlights the role of the market, i.e. the perception of PNR value in the property market establishment. The market values good accessibility, and a choice of access mode is particularly valued as is visibility and proximity. A building with parking attached will appeal to a wider range of potential occupiers and will sell more quickly. The value of PNR in some cities has risen at a far greater rate than the commercial space it serves.
- 3.3 The current policy on PNR is contained within a revised version of PPG13 published on 3rd January 2011. The overall objectives and guiding principles of PPG 13 have remained largely unchanged with the emphasis still given to setting parking standards as part of a package of measures to promote sustainable transport choices and the efficient use of land, enable schemes to fit into central urban sites, promote linked trips and access to development for those without use of a car and to tackle congestion. (para. 51) Para. 52 stresses the need for a consistent approach to setting standards for larger developments and Annex D sets out **maximum** standards for certain developments above size thresholds. However, local planning authorities may adopt more “rigorous” standards and, indeed, all standards for smaller scale developments that form the majority of applications. Para. 53 accepts higher levels of parking above the maxima in Annex D where applicants have demonstrated through a Transport Assessment that more parking is needed.

Para.54 notes that it should not be assumed that development complying with local parking standards will be automatically acceptable in terms of achieving the objectives of PPG 13. Applicants of larger schemes should show what measures are to be employed to minimize the need for parking.

- 3.4 With regard to private residential parking (PR), on 3rd January 2011, the Minister of State at DCLG announced the removal of the requirement for local authorities to set maximum parking standards for housing developments in their area. The National policy is now permit local authorities to decide what level of parking is right based on the needs of their community provided they have regard to the need to promote sustainable transport outcomes.

Local Policy

- 3.5 In view of the National policy changes outlined above, it is timely to review the Council's parking standards as part of the draft Parking Strategy and the LTP3. This review has included two consultation events held with local stakeholders and facilitated by Amey. On these occasions, round table discussion took place on a range of parking topics including two on private parking – non residential and residential. A summary of the comments and suggestions raised is given below.

Private Non Residential Parking

1. Parking to be provided for new development should meet the projected demand. Where shift practices occur, the actual demand may be greater at change over times.
2. Parking standards could be set at different levels reflecting the local conditions e.g. the level of public transport.
3. It was suggested that developers be given the choice of providing the full parking standard on site or otherwise providing a minimum of 50% and a sum of money to fund the balance of provision in a new or expanded public car park in the area.
4. Larger industrial or business park developments should be designed for communal parking.
5. Larger PNR facilities in appropriate areas should be opened for public use at the weekends. This might include schools and colleges and involve rate reductions. Existing PNR stock should be surveyed to see if public access can be made available.
6. There is no appetite at present for the introduction of workplace parking levies as the level of public transport is low.

Residential Parking

1. The forecast parking demand should be met on site.
2. New accommodation for the elderly is lacking adequate parking.
3. Larger garages should be required in new housing development in order to allow convenient car door opening and to provide more storage space sufficient to accommodate a car and general storage. Charging for electric vehicles should be provided.
4. There is a general problem of families not using their garages or even driveways for car parking when they can park freely on street.
5. Conversion of garage space to living space should not be permitted.
6. Green verges are unsuitable for parking and some alternative material are needed where adequate room exists.

7. The principles behind the Home Zone practice should be examined to test the appetite for residents' funding of better street designs and management.
 8. Residents' permit allocation policy and visitor vouchers need to be reviewed (the balance of allocation is a problem in Letchworth).
- 3.6 Although private sector developers were invited to the consultation events, their participation was limited. However, a number of other participants provided comments in a role-playing manner. Further insight into the views of developers has been obtained elsewhere and is reflected below.

4.0 THE MEANS OF SETTING PARKING STANDARDS

The Demand Standards Approach

- 4.1 By the late 60's, parking standards in town centres had increased to the "self-containment" level, i.e. the full demand for parking tended to be met within the curtilage of the site. By then, however, the authorities responsible for the metropolitan and major urban centres had recognised the inevitable outcome of congestion and were introducing more restrictive standards.
- 4.2 In areas with relatively weak public transport and in areas concerned to attract inward investment and car borne visitors from other competing centres, demand standards are still being sought and are sometimes in excess of actual demand and the provision being applied for.

The Two-Part and Operational Standards Approach

- 4.3 Some local authorities devised more restrictive standards in areas experiencing traffic congestion. The objective was to reduce the amount of on site private parking to (or close to) an operational (service vehicles only) level and to provide the balance off site as public parking often via a commuted payment system. This approach is believed to have been operated somewhat arbitrarily and in the majority of cases the full specified standard still tended to be achieved on site. The more recent and widespread practice of seeking developer contributions via s106 agreements for local transport and public transport improvements has suffered somewhat because of the overall weakness of the earlier approach.

The Capacity Rationing Approach

- 4.4 The approach here is to determine the access or corridor capacity available for newly-generated local traffic and then to apportion out the parking provisions and developer contributions to the development sites served by the access or corridor. This approach was adopted on a part of the A40 route through the Park Royal industrial estate in West London and in more rural Kent adjoining a motorway junction. This approach overcomes the "first come, first served" treatment for a development area but it is otherwise still a somewhat arbitrary approach to planning. At its simplest level, the parking provision on a single site is determined by the access capacity and normal highway and traffic safety criteria. This approach was adopted in Manchester following a period when restrictive parking standards were applied.

The Area Needs Approach

4.5 Here attempts are made to tailor the standards to the particular needs and attributes of a local area. The criteria taken into account can be many and various, e.g.:

- the availability and management of public off-street parking;
- the control of all on street parking and planned changes;
- environmental and traffic planning policies;
- site constraints and design considerations;
- public transport availability;
- economic and competition considerations.

This approach is quite common in practice. Although the various criteria are rarely set down, they are taken into account in arriving at a particular standard for say a design brief or in any pre-application discussions.

The Modal Split Target Approach

4.6 This approach became more common following the arrival of the Road Traffic Reduction Act. It was seen that parking standards could play an important part in achieving traffic reduction targets over a 10-15 year timescale. A modified approach is often appropriate in regeneration areas and was used in London's Docklands where significant public transport improvements were planned but not committed in the early stages of development. Where attracting inward investment is a high priority, a related approach of providing parking at high levels for the initial phases of large developments has been applied – possibly with some enabled by temporary consents – and then applying more limited standards for the later phases.

The Public Transport Accessibility Level Approach

4.7 This approach was first advocated by the London Planning Advisory Committee (LPAC) set up after the abolition of the Greater London Council and employed by local authorities in London and in larger towns and cities. The measurement of Public Transport Accessibility Levels (PTALs) is encouraged in PPG13.

4.8 Despite the initial difficulties in agreeing a common measure of PTALS, developing a user-friendly method of producing them and finally linking them to parking standards, the technique has gained wide acceptance in London and elsewhere and is particularly useful when it has encouraged the adoption of similar standards and factoring techniques employed across administrative boundaries. One of the pioneering "PTAL" councils, the London Borough of Hammersmith and Fulham also developed an inverse plot ratio link to parking standards whereby the determining factor for permitted parking is site area

rather than floor area. In some respects this approach is more akin to capacity rationing.

The “Developer” Perspective

4.9 Research into this subject for National government has included consultation with local authorities, developers, retailers and town centre management organisations. It is interesting to note that developers and national retailers see the need for reform in the setting of parking standards. The different standards and derivations employed are a major source of concern. There are perceived and real concerns about parking competition across local authority boundaries involving both parking standards and charges. Despite this there is evidence of more parking being required than is wanted - particularly for retail development as trading hours have extended. A further consideration is the timing of introduction of any CIL in the area and how this may impact the viability of development.

The Requirements for Parking Standards

4.10 Noting the strengths and weaknesses of the above approaches and the feedback from practitioners involved, the fundamental requirements for setting parking standards would seem to be:

- to be an integral part of a wider parking strategy;
- firm regional guidance e.g. providing ranges of standards;
- fairness and consistency in application;
- transparency/simplicity/user friendly derivation;
- realism and achievability;
- local flexibility, for example for major development and regeneration areas;
- defensible at public inquiries.

5.0 THE CHOICE OF PARKING STANDARDS FOR CENTRAL BEDFORDSHIRE

Private Non-residential Parking

- 5.1 From the discussion points raised above, the PNR standards to be adopted and applied need reflect a balance between meeting parking demand in the varied locations in the area and respecting the sustainability policies set out in the Local Transport Plan. At the same time they need to be fair, consistent and transparent.
- 5.2 The parking standards currently applicable in Central Bedfordshire are generally at or close to the maximum advised in PPG13. In this regard it is useful to examine from first principles the relationship between parking demand and standards in a typical use case example – say an office development (B1 Use Class) of 1000 sm gross floor area. In doing so it is necessary to be aware of current car use and the LTP targets for 2026 as set out in LTP3.

Worked Example

B1 Office Development 1000sm GFA sited both in town and out of town locations

Net Internal Area (NIA) 85% - 850sm

Employment based on 15smper Full Time Equivalent⁽¹⁾Employment Densities Guide 2nd Edition, HCA, Drivers Jonas Deloitte, 2010 - 57 jobs

Site/Business Attendance/Vacancy factor – 90% - 51 people working

Average car occupancy 1.1

LTP3 2011 Urban area car mode -72% with 33 spaces needed(1 per 30.3sm GFA)

LTP3 2026 Urban area car mode target -65% with 30 spaces needed (1 per 33.3 sm GFA)

LTP3 2011 Rural area car mode - 82% with 38 spaces needed (1 per 26.3 sm GFA)

LTP3 2026 Rural area car mode target -80% with 37 spaces needed (1 per 27.0 sm GFA)

- 5.3 The “demand” standards as calculated from the first principles example above use floor space, employment density and vacancy/occupancy metrics from research for the HCA updated in 2010. However these data do not account for the current trend of increasing employment space density and the parking

demand does not allow for overlaps of shift working and visitor parking. All these factors would serve to increase the amount of parking needed for a given GFA and hence to increase the parking standard. Taking these factors into account, it can be seen that there is still some justification for retaining the maximum standards (1 per 30 sm) for B1 general office development for any project size in the urban areas but for adopting slightly higher maximum standards (say 1 per 25 sm) in the rural areas.

- 5.4 The standards for offices in Business Parks (B1) should be similar to those for general office but could, with some justification due to a higher employment density, be slightly higher (say to 1 per 25 sm).
- 5.5 General Industry (B2) has a significantly lower employment density (from 36 to 47 sm per FTE) and Warehousing and Distribution (B8) has very low density (from 70 to 80 sm per FTE). If similar journey – to - work mode choices are assumed to apply to the employees here as with B1, then the standards for B2 should be in the order of 1 per 100 sm and for B8 they should be between 1 per 150 to 200 sm.
- 5.6 In areas where public transport is more comprehensive in its service and directional coverage (as partially measured quantitatively but in a standard form by software such as Accession), it is appropriate to apply a reduced standard (or discount) or, with larger developments say over 1500 sm and potentially yielding at least 50 parking spaces, securing public use at weekends. Where a discount is applied, an obligation should be sought related to the value of the on site parking spaces discounted to fund public parking and/or improvements to public transport serving the area.
- 5.7 In order to keep any discounting system as simple as possible (and bearing in mind that public transport accessibility levels change over time and not always for the better in more rural areas), it is suggested that, at most, two levels of accessibility are used for discounting. These would yield discounts at 25% and 50% in areas enjoying high and very high levels respectively.

Retail Parking

- 5.8 The current standards for parking at larger retail developments (i.e. over 1000 sm) are 1 per 14 sm for food retail and 1 per 20 sm for non-food. These are the same standards as the maximum ones in PPG 13. The current standard for smaller retail schemes is 1 per 35 sm. These standards are judged to be appropriate for retention. They are broadly compatible with the retail standards used across the region and well within the out of town superstore standards of up to 1 per 9 sm that used to apply before PPG 13 was first prepared. Large retail warehouses and superstores located on the edge of or outside towns will need some parking for employees and the employment density data suggests

that up to 20% of the spaces provided by the standards could be needed if all the staff had access to cars and were permitted to park on site.

- 5.9 The management of parking on retail sites in or close to the centres of towns can affect the viability of the public parking there and indeed the viability of some shopping outlets. A management and pricing regime compatible to that adopted in the town should be applied to retail parking where car parks exceed say 50 spaces.

Residential Standards

- 5.10 From the consultation events it became clear that the parking provided for housing should meet the expected demand and not lead to additional parking pressures on the public roads. It was also made clear that both garages and drives in existing housing were underused if parking is freely and conveniently available on the public roads. The developer perspective is naturally one of costs and marketability and, to an extent, design. There are also viability concerns over the application of minimum standards for example in constrained locations in town centres.
- 5.11 The key determinant of residential parking demand is household car ownership levels. These change with changing household occupancy characteristics – for example with young adults staying longer in their childhood homes. A review of practice evolving in other areas displaying high car ownership rates indicates that, once again, a balance needs to be struck in supporting transport policy – avoiding parking overspill onto public roads whilst avoiding the actual encouragement of higher car ownership.
- 5.12 Taking these factors into account the advice is to adopt minimum parking standards for housing that reflect current levels of household car ownership. However, a garage should be counted as a parking space and be large enough to accommodate general storage and cycles. However, increasing the use of garages for vehicle storage is still likely to be difficult unless there is extreme pressure (and probably parking restrictions) on the adjacent public roads.
- 5.13 The suggested parking standards for residential schemes are set out in section 6 below.
- 5.14 There is evidence (2) that in larger, mixed housing projects, the overnight parking demand is some 10% less than the measured car ownership.

2 Source: 21st Century London Living Travel Research Survey: Summary Report (May 2010). PFA Consulting, Barton Willmore et al.

6.0 THE RECOMMENDED PARKING STANDARDS

- 6.1 The parking standards shown in table 6.1 below are recommended based on the advice herein. The standards for the other, less common land use classes set out in Appendix B in the draft Approach to Parking are appropriate for adoption.

Table 6.1 : Recommended Parking Standards

Use Class	Land Use	Standard
A1 : Retail	Food Retail	1 per 14 sm (>1000 sm), 1 per 35 sm (<1000 sm)
A1 : Retail	Non-Food Retail	1 per 20 sm (>1000 sm), 1 per 35 sm (<1000 sm)
B1 : Business	General Office stand alone	1 per 30 sm maximum in urban zones, 1 per 25 sm maximum in rural zones
B1 : Business	Business Parks	1 per 25 sm
B2 : General Industry	General Industry	1 per 100 sm (>500 sm), 1 per 30 sm (<500 sm)
B8 : Storage and Distribution	Warehouse and Distribution	1 per 200 sm (>500 sm), 1 per 30 sm (<500 sm)
C3 : Dwelling Houses	1 bedroom	1 per unit minimum
C3 :Dwelling Houses	2 -3 bedroom	2 per unit minimum
	4+ bedroom	3 per unit minimum

Notes ;

1. Discounting in areas of good public transport accessibility of may apply to those standards where maximum levels are stated
2. Standards proposed that deviate from those in the Table must be justified within a supporting Transport Assessment.