



**DRAFT REGIONAL TRANSPORT STRATEGY  
PUBLIC EXAMINATION**

**WRITTEN SUBMISSION  
FOR**

**SESSION F: PARKING AND DEMAND MANAGEMENT**

### Question 13

**Is there adequate guidance on setting maximum parking standards? Is the proposed approach firm enough to achieve consistency in the application of standards across the region and in relation to outer London?**

1. Regional Planning Guidance (RPG9) comments that South East England exhibits a range of social and economic circumstances that necessitates a flexible approach to identifying an appropriate level of parking provision consistent with the overall balance of the transport system at the local level. However, the constraints exist within the transport system, when coupled with the need to rebalance the use of the transport system, means that local authorities in South East England should seek a level of parking provision that is tighter than that set out in Policy Planning Guidance Note 13 (PPG13): Transport.
2. Accordingly RPG9 requires local authorities in South East England to set as a baseline a maximum parking standard for BI land use within the range 1:30 m<sup>2</sup> and 1:100 m<sup>2</sup>. RPG9 sets out three factors that should be taken into consideration by local authorities in setting their maximum parking standards. Although not explicit within the wording of RPG9, the expectation was that those local authorities close to or adjacent to London would set a maximum parking standard closer to the 1:100 m<sup>2</sup> provision thereby avoiding a step change at the boundary with the Outer London Boroughs where the equivalent standard was in the range 1:100 m<sup>2</sup> and 1:600 m<sup>2</sup>. For residential development RPG9 notes that that the focus on urban renewal should create the opportunity to reduce the provision for residential development in areas well served by public transport.
3. An audit of existing parking standards for non-residential and residential development has been submitted to the Panel as part of this Public Examination.
4. The draft Regional Transport Strategy (RTS) extends the framework set out within RPG9 to include all non-residential development, not just BI. While the audit indicates that the majority of local authorities are now consistent with the standards in PPG13 less progress has been made with incorporating the requirements of RPG9. Compliance with RPG9 therefore appears to be an issue that needs to be addressed.
5. The Regional Assembly is now providing formal comments on the parking standards set out in all new Structure Plans (and in due course Local Development Frameworks) and the proposal to make the RTS a statutory document as part of the Regional Spatial Strategy (RSS) will improve the level of compliance still further. The requirement within the draft RTS for Local Transport Plans to consider the provision and management of car parking as part of the overall approach to mobility management (discussed as part of question 14) is critical to ensuring that the inter-relationship between all elements of the transport system is taken properly in account in determining the appropriate balance for the transport system serving a

specific area. This may in turn encourage better compliance with the guidance on the level of parking provision.

6. One aspect of non-residential parking provision that continues to give cause for concern is the issue of consistency in relation to outer London Boroughs, something confirmed by the audit. The Regional Assembly is working closely with the GLA to better understand the implications, if any, for land use and transport planning within the two regions.
7. Turning to the issue of parking provision associated with residential development the audit shows that there is a major problem in trying achieve compliance with the requirements of Policy Planning Guidance on Housing (PPG3), and that consideration of more restrictive parking standards as suggested by the current RPG9 is likely to be unrealistic in the majority of cases and will inhibit housing provision and achievement of recommended housing densities. The Regional Assembly is of the view that the parking standards set out in PPG3 need to be urgently reviewed.

#### **Question 14**

**Is the stance on encouraging parking at railway stations sound? Is there sufficient guidance on park and ride? Is the proposed reduction in long stay parking appropriate for all areas?**

8. The higher level of accessibility inherently associated with railway stations is reflected in the hub concept (discussed as part of Session D) and the encouragement given within the draft RTS to realise their potential to act as the focus for higher density mixed use development. However, railway stations are also an access point to the rail network and improvements to the overall level of accessibility to railway stations is likely to be a high priority, particularly the major stations located within transport hubs and the transport interchanges identified in the draft RTS. An increase in the parking provision at rail stations can increase the potential catchment population and is likely to form part of the package of measures brought forward at the local level. PPG13 highlights a potential tension between the desire to achieve higher density development in the immediate vicinity of rail stations and the expansion of car parking for station purposes. In truth this is a much an issue of seeking an improvement in the overall quality of the urban design as it is a policy issue at the regional level.
9. Park and ride is one of a number of measures that can be used to increase the overall level of accessibility into an urban area. As such its potential role should be considered as part of the Mobility Management approach used to determine the appropriate balance between the various elements of the transport system at the local level.

10. A reduction in the amount of long stay parking provision in town and city centres is rightly seen by many as an essential part of any package of measures to reduce car dependence, particularly for commuter journeys. However, the supporting statement to the draft RTS cautions against merely converting long stay parking spaces to short stay. In particular the statement draws attention to the fact that because of the higher turnover associated with short stay car parking spaces such an approach may increase the total volume of traffic on the highway network. The issue of the most appropriate management regime for an area's car parking stock is something that has to be considered as part of the mobility management approach used to determine the appropriate balance between the various elements of the transport system at the local level.

### Question 15

**Is the guidance on demand management appropriate, including the stance on road pricing, congestion charging and the allocation of roadspace?**

11. The transport system will continue to experience intense pressure from rising demand for movement, driven in part by the consequences of past failure to properly integrate land use and transport planning. In this respect the focus within RPG9 on urban renaissance is fundamental to providing the opportunity for investment to be focused on rebalancing our use of the transport system in a way that reduces car dependence.
12. In recent years much has been made of the "tool box" approach to demand managing demand wherein a set of measures, both physical and regulatory, are applied on a "mix and match" basis according to local circumstances. However experience tends to show that, where the transport system is under considerable pressure, the use of this approach has been undermined all too often by focusing on the easiest "tools" to implement, as opposed to those that will bring about the required impact.
13. In developing the draft the Regional Assembly concluded that the term demand management was often seen by stakeholders as having negative implications for an individual, in particular their ability to gain access to employment, retail or leisure opportunities and instead the draft RTS uses the term Mobility Management.
14. Mobility Management embraces the need to develop the transport system in a way that considers more positively the inter-relationship between all elements of the transport system and for this approach to be applied on a consistent basis across the region. How many local authorities, for example, when introducing bus priority measures make the connection that improved levels of access by local bus services should reduce the need for people to use their car to gain access to a town centre which in turn means that the level of car parking required can be reduced which in turn may open up opportunities to reinforce the attractiveness of the town centre through higher density mixed use development?

15. The focus should be on maintaining and, where appropriate, improving the overall level of accessibility to goods and services by considering the capacity of the transport system as a whole and not as is all too often the case a collection of individual networks. Policy T11 in the draft RTS on Mobility Management makes this way of thinking an integral element of the way forward. It provides a clear policy framework that capitalises on the opportunities created through the spatial strategy to adjust an individual's pattern of travel over time in a way that reduces car dependence. The focus on improving the overall level of access means that the draft RTS addresses some of the concerns identified in the Social Exclusion Unit's (SEU) report on transport.
16. It is clear that the pressures facing the transport system in South East England will continue to grow. This pressure leads to a lower level of reliability that reduces the attractiveness of the region as a location for business investment; it also has an adverse impact on the quality of both the natural and built environment. Mobility Management provides strong policy guidance for the next round of Local Transport Plans to develop detailed policies and proposals that set out the appropriate balance between the various elements of the local transport system.
17. By way of illustration as to how the draft RTS might be applied at the local level one can consider the Strategy Development Plans produced as part of the South Coast Corridor MMS. These plans examined the operation of the local transport system and set out a package of measures that, if delivered in a co-ordinated way, would support delivery of both land use and transport planning objectives. In some instances these Plans included the need for charging mechanisms to be introduced in order to effect the rebalancing of the transport system. The outputs from the study have subsequently been incorporated into the draft RTS. While ultimately it is for the relevant local transport authority to determine the balance of local transport measures brought forward for implementation, the draft RTS now provides clearer guidance as to the sort of issues that will need to be taken into consideration if the desired output is to be achieved. Undoubtedly the choices facing the local transport authorities in this instance will be difficult, however the draft RTS would have failed if it did not provide this level of guidance.
18. In seeking to adjust, over time, an individual's pattern of travel a critical support mechanism is the availability of comprehensive travel planning advice. Although much progress has been made with the development and implementation of travel plans for major employers, the full potential of travel planning and travel advice has yet to be realised. In particular the opportunity for small and medium sized employers to benefit from the technique has been limited. In addition there is a growing body of evidence that demonstrates that a positive and proactive approach to the provision of bespoke, personalised travel planning services can lead to a substantial and sustained change in travel behaviour.

19. Policy T14 includes a proposal to trial travel planning advice centres for transport hubs that seek to provide a focus for co-ordinating services and support mechanisms that will allow this untapped potential to be realised. In developing this proposal the Regional Assembly will look to draw upon experience of such facilities across Europe, such as in the Netherlands and Germany where the concept has been successfully developed on a partnership basis between public authorities, transport operators and the business community.
20. The Government's 10 Year Transport Plan has within it an inherent contradiction in that the development of the transport system is taking place within a fiscal framework that continues to see the real cost of motoring decline both in real terms and relative to the cost of public transport. At a European level the European Commission advocates the need to replace existing transport system taxes with more effective instruments for integrating infrastructure costs and external costs. In other words it is not so much the overall level of taxes that the Commission suggest needs to change significantly, but rather their structure.
21. With regards to the issue of charging for the purposes of this Public Examination a distinction needs to be made between the powers that already exist under the terms of the Transport Act 2000 in respect of cordon charging and workplace parking levies and the broader issue of road user charging.
22. With regards to cordon charging and workplace parking levies it must be borne in mind that it is for local transport authorities to determine whether or not these measures should be promoted. However, it is appropriate for the draft RTS to emphasise the potential benefits of such measures, as part of a wider package of measures promoted as part of Mobility Management and encourage authorities to fully explore this potential. Reference has previously been made to the way in which this aspect of the recommendations of the South Coast Corridor MMS have been built into the draft RTS investment frameworks.
23. As far as road user charging is concerned, the supporting statement to the draft RTS acknowledges the potential significance of this measure for the content of regional transport strategies and their delivery, a view supported by the outputs from a number of MMS in particular the ORBIT study. The Regional Assembly believe that this is an issue on which leadership is urgently required from the Secretary of State. Its adopted policy reads: "Recognising the serious concerns around charging per se and about the impacts on areas outside a proposed area-wide charging scheme, the Secretary of State is pressed to commission without delay a study to consider in detail the feasibility and the environmental, economic and social implications both of area wide charging schemes and of a national charging scheme. Until that work is completed and can be assessed, the Assembly reserves its position on area wide charging. Although this will be the Government's study, the Assembly expects involvement of Assembly members in this work."

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