

Transport Planning Society

One Great George Street, LONDON SW1P 3AA
T : 020 7665 2238 F : 020 7799 1325 E : tps@ice.org.uk

Response to Technical Consultation on Planning

The Transport Planning Society is an independent institutional body based in England, established to facilitate, develop and promote best practice in transport planning and to provide a focus for dialogue between practitioners and others interested in the field. It is supported by four long established professional institutions – ICE, CIHT, CILT and RTPI - all of whom have an interest in transport planning within their own core activities.

The Transport Planning Society administers its own Professional Development Scheme for transport planners, leading to award of the Transport Planning Professional qualification which is the only professional qualification uniquely aimed at transport planners. The Society has almost 1000 professional members in the UK and elsewhere. Many of our members are active in traffic, highway and road safety matters.

This response has been prepared by the Policy Group and approved by the Society's Board and focuses on the proposals in Section 2 of the document, in particular the proposal to restrict the use of maximum parking standards. We are also concerned about the changes to permitted development rights which could have transport as well as economic impacts both on local centres and the overall need to travel. Our view is that a development planning framework is needed which should provide positive support for centres, including their remodelling where necessary, accompanied by the prevention of out-of-centre development in cases where it could be provided for in local centres.

In the second section of this response we review the proposal to remove maximum parking standards in more detail and offer an alternative way forward based on accessibility by sustainable modes. We consider that some central guidance is needed on standards and, ideally on pricing structures, to help minimise "parking wars" between local authorities.

Permitted development (Section 2, A to E)

We support the need for flexibility for change of non-residential use in high streets in order to encourage new patterns of activity which will ensure their survival¹. This is important in transport terms because reducing the need to travel (part of demand management) depends on the provision of local opportunities for work, shopping and leisure, including but not confined to, the concept of mixed development.

However, in one regard the proposals seem to work against this – making it easier to convert from employment use to residential use with no overview of the balance between residential and commercial use in any one local centre. This could have two negative effects on its operation, both undermining the vitality of centres, and leading to:

1. Inhibition of commercial uses by need to avoid hours, activities, etc impinging on residents' amenities; and
2. Dilution of the agglomeration value of clustering of commercial/retail uses, leading to further decline.

The three year temporary permission for the conversion from office to residential² is proposed to be made permanent and the significant area exemptions removed. This right is proposed to be further extended to include warehousing and light industrial³ and some specific uses including amusement arcades and, somewhat surprisingly, launderettes⁴.

A de minimis level below which flexibility is permitted allows for a proportional approach, for example the threshold for changes within the land use Class B (commercial sites including office and light industrial). Apart from this, we see dangers in the easy conversion from employment to residential use, especially in local shopping and employment centres. Here there may well be a strong financial incentive for private owners to convert to a higher value use, but this is likely to have an even higher cost to the public in terms of lost local choice and greater transport costs. This is because the effect of such separation of land uses is to make jobs and other essential activities less accessible, especially by walking or cycling. This in turn has a range of social and personal costs, ranging from lower choice and social exclusion to wider issues including air pollution and safety.

We therefore support section E of the consultation Section 2, but strongly oppose sections A to C. Section D concerns residential extensions on which the Society does not have a view, other than they should not impose additional external costs, for example extra rainwater burdens on the sewage system (i.e. use soakaways on site). In the context of permitted development, we also consider that the consultation should have included the extension of such rights to the conversion of car parks, especially both in local centres and in urban areas more generally.

¹ See Section E of the consultation

² This ends in May 2016

³ Proposal A of the consultation

⁴ Section B of the consultation document

Maximum parking standards (Section 2, end of proposal H)

Introduction and context

Our first comment on this short section of the consultation⁵ is how it highlights the severe weakening of the links between land use and transport planning policies, and the complete lack of understanding of how managing demand for transport, in particular road transport, is just as important for economic development as it is for environmental improvement, public health, and meeting the UK's targets to reduce carbon emissions.

Ministers have stated that “predict and provide” is not Government policy. It must follow, therefore, that, following “prediction”, there will need to be a mixture of some provision and some demand management (including the encouragement of sustainable modes). Managing demand is a high performing, high value for money approach. It is usually cheaper than major construction, can respond quickly to external change, and achieves reductions in congestion at the same time as reducing external costs such as pollution and climate change. It also avoids the self defeating mechanism of encouraging more traffic, and, often ignored, also avoids locking in car dependent behaviour and making demand management and healthy travel much more difficult.

Despite this, demand management for transport is now being comprehensively ignored, particularly in planning. In fields such as energy or water supply, conservation (i.e. demand management) is just as much a part of policy as construction. It is unthinkable that the building of new homes, shops or workplaces would exclude measures to minimise the use of energy or water, and the production of waste. Developments which are claimed to be “sustainable” in these terms may increase greenhouse gas production and damage local air quality through their dependence on carbon intensive methods of travel. This is a serious case of a totally non-joined up policy between transport and policies for the environment, health, and public safety.

In this context, scrapping guidance on parking may seem a modest proposal. However, its role has very great importance for two distinct reasons. The first is that, outside London, Government has discouraged or abandoned the other tools which might manage demand. Road user charging is always at least 10 years away, despite the collapse in motoring revenue that will occur if the Government's electric vehicle policy succeeds, let alone the balancing of demand across the network which would then become possible. This in turn would both reduce external costs and make better use of the existing road network. Even the recent lorry road user charging system is designed to be revenue neutral (i.e. not manage demand) and is basically a way of capturing revenue from foreign HGVs.

In this case the other classic levers of push and pull (sticks and carrots) have to be used to achieve a more sustainable outcome for transport both in terms of economy, environment or health. It is an obvious fact that if one powerful lever is ruled out, the others have to

⁵ Paragraphs 2.77 to 2.78 question 2.16

work harder. This brings us back to parking. Its provision and how it is charged for has been one of the key levers to manage demand, particularly in the absence of national road user charging, and even the proper charging of the value of parking land. The compromise proposal, allowing local authorities to charge for workplace parking, could never allow for a nationally consistent and effective approach. Only one authority, the City of Nottingham, has introduced it, successfully using its income to fund sustainable transport especially the city tram.

It is worth noting that both London (the major city with a form of strategic road pricing) and Nottingham (the major city with workplace parking levy) are very successful in economic terms, but also have some of the highest public transport use per head in the country.

Development related to sustainable access

If an alternative to the current maximum standards is required, we consider that accessibility by sustainable travel modes (including walking and cycling) would provide a simple, transparent and efficient method of calculating parking in new development. Non-housing development permission should be directly related to the accessibility of the site in question to long term sustainable transport networks (existing or being constructed), and to walking and cycling catchments. For housing, the same assessment of access to sustainable networks should apply, but in this case the number of jobs and facilities such as local shopping, healthcare and leisure which are accessible by foot or cycle would also be a key factor. In other words planning permission depends upon sustainable accessibility scores.

The system would have to have national standards, to avoid any attempt by some authorities to attract developers by offering generous parking, and creating non-sustainable patterns of land use which are cheaper for developers but have very high external costs passed on to local and national tax payers.

This is not difficult, we now have second and third generation accessibility mapping which has been used by private and public sector for over a decade, both in London and in rural areas. It is evidence based, simple, and easy to understand and display. We suggest that the sustainable accessibility approach should be fully adopted by central Government, to replace its ad hoc application by local authorities.

In these circumstances, a share of sustainable travel should be calculated, and the provision of parking spaces linked to the remaining, higher priority road users (such as car sharers). If maximum parking standards are considered inadequate, parking provision based on a (minority) mode share by car and car share, applied to the number of jobs, visitors or household members, would provide a possible alternative.

We are also aware of the existing criticisms of limiting parking space provision. First, in the case of non-residential development, surrounding areas can come under pressure from commuter or business parking. The use of accessibility mapping should reduce this effect, however there are well established methods for combating this problem, especially the use of residential parking priority areas. These have become more user friendly, though still

need some work to avoid motorists feeling they are being seen as easy money for an over enthusiastic local authority. Again this is an area where Government guidance on “proportionality” in parking penalties has helped, but there is more that could be done.

In the case of residential developments which have low parking provision, or are car free, problems can occur where there is a lack of planning for alternative means of travel. This supports our view that new development (including redevelopment) needs to have a travel plan which addresses these issues, rather than a free for all which imposes new stress on local networks and on street parking. This of course includes provision for car use for example through provision of car clubs and booked visitor parking which are integral to the development.

For completeness, we offer a formal answer to the consultation question as follows:

Question 2.16: Do you agree that parking policy should be strengthened to tackle on-street parking problems by restricting powers to set maximum parking standards?

No, we do not agree that parking policy should be changed to restrict local planning authorities’ ability to set maximum parking standards. The ability to manage parking is an important element of managing the demand for transport and encouraging the use of alternatives to the car and it is essential that local planning authorities retain this ability. This needs to be exercised within national guidance, the aim of which is to avoid inconsistency, particularly between neighbouring authorities.

The assumptions used for current road traffic forecasts include a level of parking restraint based on the use of maximum parking standards. Completely removing any limits on the amount of parking allowed in new developments will undermine efforts to support sustainable transport and will lead to increased levels of traffic with the associated impacts in terms of congestion, pollution and road safety.

When used appropriately, maximum parking standards can facilitate higher density development and more appropriate urban design in areas that have good public transport accessibility and their continued use will help maximise the amount of new housing that can be delivered.

We also strongly suggest that the use of established sustainable accessibility and catchment mapping techniques should be a key input to planning permission as well as parking standards.

25th September 2014

Please contact us at info@tps.org.uk if you would like any further information in connection with this response or clarification of any of the points we have raised.