

Department for Communities and Local Government consultation on planning (maximum parking standards)

Consultation response from Campaign for Better Transport, September 2014

This is a response from Campaign for Better Transport to the consultation on planning launched by the Department for Communities and Local Government (DCLG) on 31 July 2014:

<https://www.gov.uk/government/consultations/technical-consultation-on-planning>

It concerns only paragraphs 2.77 and 2.78 of the proposals, and question 2.16, all relating to the proposal to restrict local government powers to set maximum parking standards in planning policies.

Introduction

Since 1973, Campaign for Better Transport has been helping to create transport policies and programmes that give people better lives and support the environment. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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?

We do not agree with these proposals. There is strong evidence of the effectiveness of maximum parking standards, in reducing congestion and traffic, and no evidence that removing them will help relieve on-street parking problems or aid in the development of local economies more generally. Studies have shown that many retailers overestimate the number and value of those arriving by car compared to by other means.

Allowing or demanding more space for car parking will drive up development costs and reduce densities which will lead to more urban sprawl. This in turn will generate more car traffic, further exacerbating parking problems.

By removing limits to new residential parking spaces and encouraging more car ownership and use, this change will put in jeopardy the Government's legally binding commitment under the Climate Change Act to reduce emissions from transport, embodied in the assumption made by the Committee on Climate Change that motor traffic will be reduced by 5 percent compared with forecast levels by the end of the fourth carbon budget period.

Removing maximum parking standards from the many local planning policies that contain them has the potential to damage other government policy objectives, including improving access to service and reducing car dependency. A full evaluation of the impact of the proposal should be carried out before it is considered – this consultation has not provided this information.

Finally, we also believe that a national restriction of this kind would be contrary to the government's wider policies of localism, preventing the best policies for each local area being put in place. In many areas, including but not restricted to large cities, parking policies are a valuable way of ensuring the best use is made of land and that new housing does not contribute to local congestion. Removing this tool from local authorities would seriously undermine their ability to plan for a less congested more sustainable future.

Brief evidence to support our response is given below. We also support fully the submission made by the National Transport Committee of the Local Government Technical Advisers Group (TAG) , which contains valuable additional evidence of the benefits of maximum parking standards and the principle of allowing local authorities to set parking provision limits at appropriate levels.

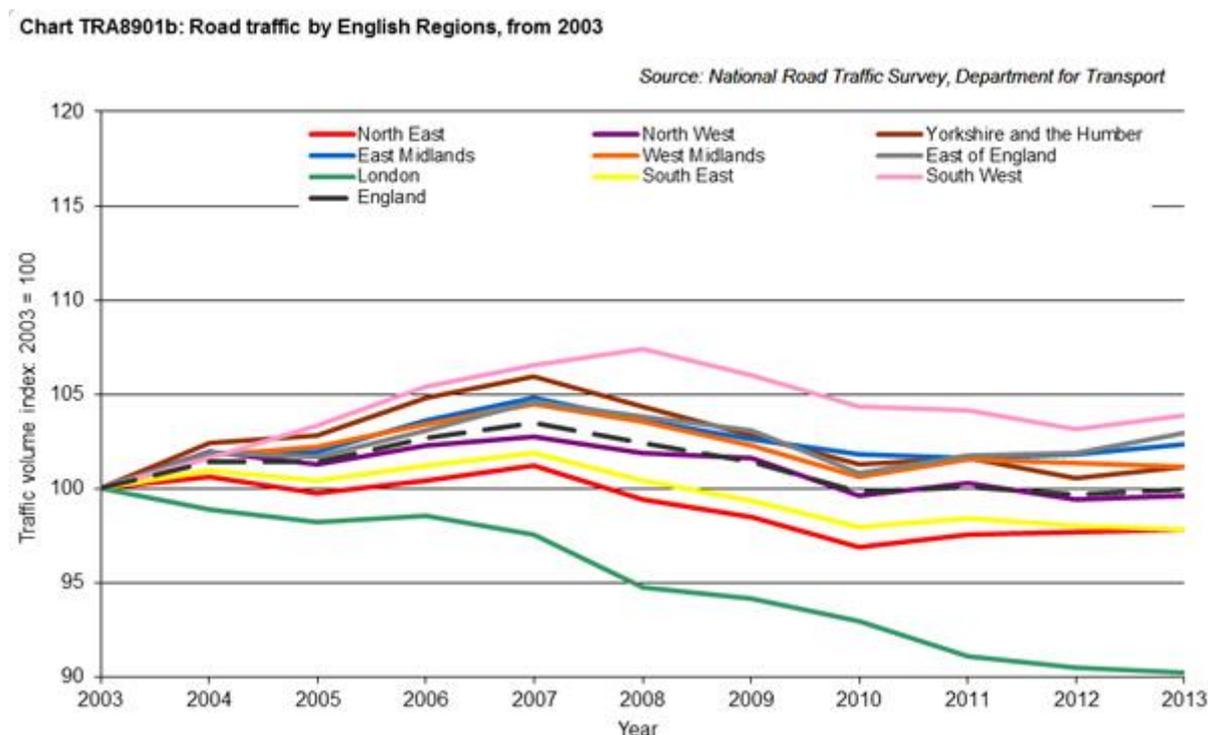
The full TAG response can be read here:

<http://www.lgtag.com/index.php/component/attachments/download/703>

A. Benefits and impacts of maximum parking standards

There is much evidence of the benefits of maintaining maximum parking standards. Across the country, traffic levels have not grown over the past decade, and in London they have fallen, partly due to the 40-year history of setting clear maximum parking standards across the city.

Figure 1: Data from national traffic statistics, 2003 to 2013:¹



London's economy and the health of its local town centres have not suffered from these measures – in contrast, the evidence is that by promoting higher density development, and encouraging businesses to locate near public transport hubs, there is greater efficiency and less of the 'hollowing out' seen in other towns and cities.

¹ From table TRA8901 2013 national traffic statistics, Department for Transport 2014 <https://www.gov.uk/government/collections/road-traffic-statistics>

These are positive trends that provide no pressure for increased car parking in newer developments. If any policy changes are to be made, they should be to reduce car parking provision further. This would help build upon these changes and allow more space to be used for accommodating people rather than vehicles.

A Government-commissioned study looked at the influence of parking policies on traffic growth and economics in 2008. This was carried out by Atkins for the Department for Transport (DfT), and found:²

"i) Restricting parking numbers leads to a reduction in demand

ii) Modelling has shown that parking is a more effective demand management tool than public transport fare reductions

[...]

xiv) There is no evidence that relaxing parking standards improves economic performance"

B. How the change would undermine other Government policies and its commitments under the Climate Change Act

The UK has a legally binding commitment to reduce climate change emissions under the Climate Change Act. Carbon budgets and policies put in place to reduce carbon are monitored by the Committee on Climate Change (CCC).

Recent reports from the CCC show it expects a **five percent reduction in traffic** compared with forecasts during the fourth carbon budget period up to 2027, which it assumes will be brought about by demand management measures, particularly smarter choices.³

Removing a proven, effective demand management measure from the policymakers' portfolio by preventing local authorities from controlling parking provision would therefore carry a strong risk to the UK achieving these reductions commitments.

For this and many other reasons, the potential impact of this change in planning policy should be evaluated fully before it is considered and relevant Government departments consulted on the potential impact on their area of responsibility, including traffic growth (DfT) and carbon emissions (Department for Energy and Climate Change).

However, the present consultation provides no information at all on the likely results for traffic congestion, carbon emissions, noise, water and air pollution or any other environmental impacts. Even the short 'impact assessment' paragraph that accompanies some of the changes proposed in the rest of the consultation is missing from the section on parking and there are no other supporting documents to provide this information.

Unreliable evidence from developers

Recent reports from the large development company Berkeley Group claim to demonstrate that relaxing parking standards carries little risk, and that allowing more parking spaces and encouraging car ownership will not lead to more traffic.

The company's 2011 report on this topic concludes: *"in the majority of recorded survey data there is no apparent relationship between levels of car ownership and levels of recorded car use"*⁴

² Research into the Use and Effectiveness of Maximum Parking Standards, Atkins for the Department for Transport, June 2008 <http://webarchive.nationalarchives.gov.uk/20111025111955/http://www.dft.gov.uk/publications/maximum-parking-standards>

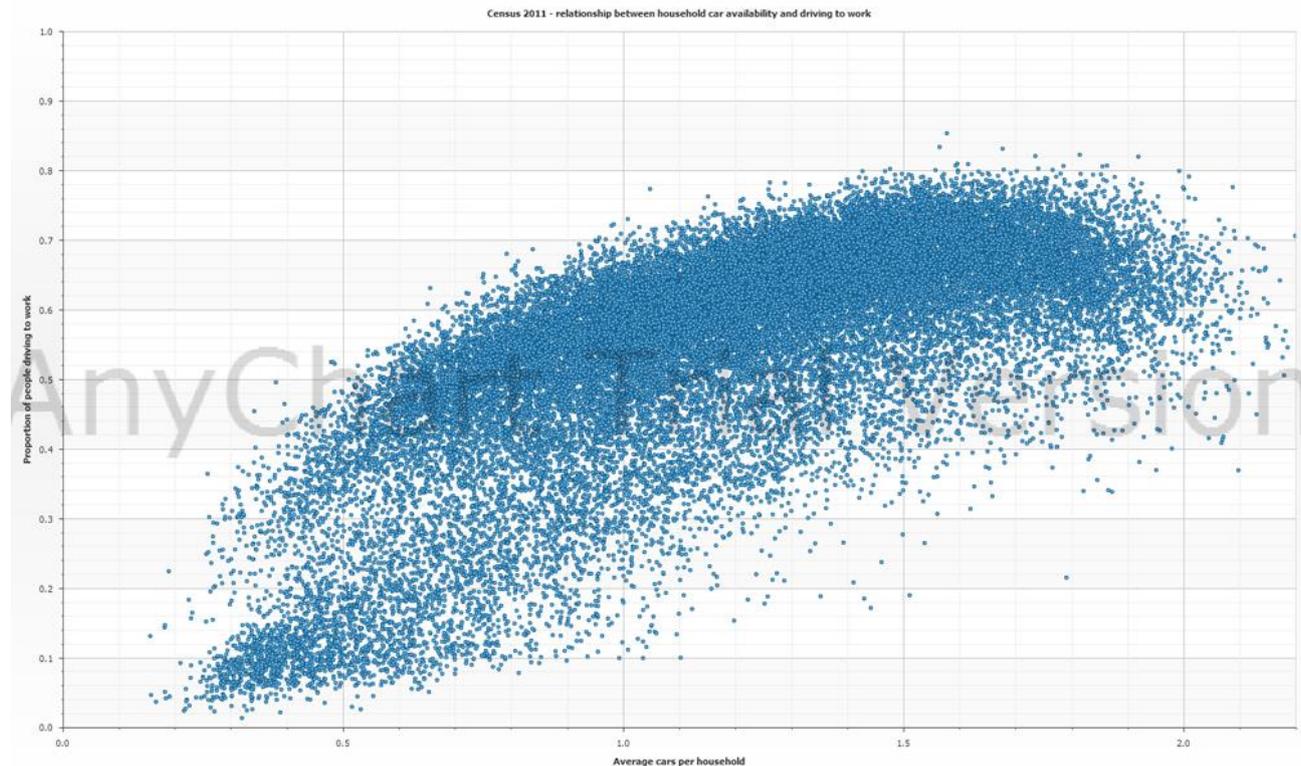
³ Fourth Carbon Budget Review, part 2. Committee on Climate Change, 2013 <http://www.theccc.org.uk/publication/fourth-carbon-budget-review/>

⁴ Does car ownership increase car use? WSP for Berkeley Group, 2011 <http://www.berkeleygroup.co.uk/media/pdf/e/t/car-parking-report.pdf>

However, in evidence prepared for the examination into the Further Alterations of the London Plan this year, we reanalysed these results and found that, even within the company's own data, there are in fact strong signs of relationships between car parking provision, car ownership and travel by car. The relationship between the provision of parking spaces and the level of car ownership was particularly strong in the Berkeley Group data, with a correlation coefficient of 0.8 – significant even for the very small sample size.⁵

The much larger dataset of the 2011 Census – looking at all Lower Super Output Areas in the UK – also shows that there are clear and strong relationships between car ownership and levels of commuting by car.

Figure 2: 2011 Census LSOA data: average number of cars per household (x-axis) vs % driving to work (y-axis)⁶



[correlation coefficient: 0.71]

These conclusions, combined with the Atkins evidence for the DfT, show that relaxing parking standards would be a step backwards in terms of traffic restraint, would be unlikely to help businesses, and would be a very risky change to make when faced with a growing population and the need for increased density of development within towns – rather than suburban, car-dependent sprawl – in all areas of the UK.

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⁵ Written statement for the Further Alterations to the London Plan Examination in Public, Campaign for Better Transport, August 2014 http://www.bettertransport.org.uk/sites/default/files/research-files/WR_Campaign_for_Better_Transport_305_Aug2014.pdf

⁶ Census data by LSOA via Nomis database: <http://www.nomisweb.co.uk/census/2011>