

ANGUS COUNCIL

**PLANNING AND TRANSPORT POLICY COMMITTEE
ROADS COMMITTEE
DEVELOPMENT CONTROL COMMITTEE**

**2 MAY 2002
2 MAY 2002
9 MAY 2002**

**SUBJECT: DRAFT NATIONAL PLANNING POLICY GUIDELINE 17 ADDENDUM
MAXIMUM CAR PARKING STANDARDS**

REPORT BY DIRECTOR OF PLANNING AND TRANSPORT and DIRECTOR OF ROADS

Abstract: This report comments on the Draft National Planning Policy Guideline 17 Transport and Planning Addendum and forms the suggested basis for the Council's response to the proposed national maximum car parking standards.

1 RECOMMENDATION

It is recommended that each of the Committees for their respective interests:-

1. note the content of the Draft NPPG setting out proposed national car parking standards and agree this report as the basis of the Council's response to the Scottish Executive;
2. request that the Scottish Executive give reconsideration to the proposals, taking account of the concerns summarised in paragraphs 4.2 and 4.3 of this report, and that in the first instance the maximum parking standards be applied to business/higher education;
3. accept the proposed national maximum parking standards for the designated types of development within Angus in the event that 2. above is not agreed by the Scottish Executive.
4. agree the suggested responses to questions posed in the Regulatory Impact Assessment accompanying the Draft NPPG as set out in Appendix 1 to this report;
5. note that in the light of the current advice, the overall parking standards for Angus will be reviewed and a future report brought back to members in due course.

2 INTRODUCTION

- 2.1 The Scottish Executive has published a consultative draft of NPPG 17 Addendum which deals with the implementation of maximum car parking standards by Councils. It sets out national maximum car parking standards for a small range of significant travel generating land use types where proposed development is above specified size thresholds. The policy in the draft Addendum would apply to new development which is subject to applications for planning permission.
- 2.2 Comments on the contents of the Draft NPPG have been sought by the Scottish Executive by 30 April 2002. In order to meet this timescale a copy of this report has been forwarded as the draft response of the Council subject to confirmation by the relevant Committees.

- 2.3 In addition to the Draft NPPG, a draft Regulatory Impact Assessment has been prepared by the Scottish Executive. This deals with potential impacts on business and other relevant sectors of the economy. It discusses options, risk assessment, equity and fairness, benefits, compliance costs, and effects on local authorities. Suggested responses to various questions posed in the Regulatory Impact Assessment are set out in Appendix 1 to this report.

3 DRAFT NPPG

- 3.1 A summary of the main points covered in this Draft NPPG is as follows:-

- National Planning Policy Guideline 17 Transport and Planning, published in April 1999, introduced a change from minimum parking standards to maximum parking standards, and indicated that further guidance would be issued. This Draft Addendum contains that guidance.
- Constraining car parking for new developments focuses developers' attention on the overall travel context of the development, including providing for travel by public transport, on foot and by cycle. Locating development where it is most accessible to more sustainable modes of travel also benefits those without access to a private car.
- Councils should prepare, in consultation with stakeholders, their own set of maximum parking standards, and publish these in their local transport strategy or in regional transport strategies. Factors in determining standards include public transport accessibility; walking and cycling opportunities; economic development including tourism objectives; available of public on-and off-street parking; town centre issues; and the need for controlled parking zones.
- Sites where sustainable transport is not supportive but development is nevertheless desirable require action by developers to invest in sustainable transport with maximum parking standards playing a role.
- Councils should be generally sympathetic to the needs of shift workers and those with unsocial hours.
- Councils should continue to make appropriate provision for cycle parking and for disabled parking.
- Residential development is not generally appropriate for maximum car parking standards.
- In addition to maximum standards determined by Councils, this Addendum sets out national maximum car parking standards for seven significant travel generating land uses where new development is above specified size thresholds. These standards will be backed up by a new Development Control Referral Direction.

- 3.2 The Draft NPPG envisages that prospective developers will for specific developments at particular locations seek exemptions from maximum car parking standards. It suggests such exemptions should only be acceptable if they are justified in detail in a Transport Assessment to the satisfaction of the planning authority. In addition, in order to oversee national consistency and assist national monitoring of the standards, a Referral Direction is proposed to take effect from formal publication of this Addendum, which would require any development over the thresholds within the categories set out in the national maximum car parking standards which breaches these standards to be referred to Scottish Ministers for consideration of call-in.

4 DISCUSSION

- 4.1 The Angus Local Transport Strategy recognises that parking standards for new developments are a challenging issue. In a largely rural area such as Angus a sensitive approach is required which recognises the higher car ownership and car dependence in rural areas; relationship between mobility, car availability and access to services; and implications for the costs and quality of rural life.
- 4.2 The aim of imposing maximum car parking standards is recognised and if it did result in further support for public transport and the location of development to areas which are well served by a choice of travel modes, there would be benefits. However, although well intentioned the proposals do have practical difficulties. Large supermarkets are based upon the bulk purchase of food and other convenience goods. Given the difficulties of transporting weekly shopping purchases it is unrealistic to expect car owners to not use their cars for such purposes – no matter how good the public transport service. Perhaps encouragement of Internet food shopping would be a more effective means of reducing travel.
- 4.3 Similar considerations apply to bulky goods non-food retailing and it was the nature of such goods that led to support for retail warehouse developments. Again, a limitation on parking below customer demand does not appear to be realistic. The proposed limitation on cinemas may also present difficulties as peak usage is normally in evenings when public transport tends to be less frequent. As major cinema complexes are located in larger urban areas and rural towns often have no local cinema, residents in rural areas are likely to be particularly disadvantaged if parking levels are set below customer demand. Similar concerns would apply to leisure facilities and to stadia where the recommended maximum appears to be particularly low.
- 4.4 With regard to business and higher/further education the principle would appear to be more justifiable.
- 4.5 Notwithstanding the above comments on the proposals, consideration has been given to the position in Angus. Current parking standards operated in Angus are based on minimum levels of appropriate provision across a range of types of development. Table 1 below identifies the national maximum car parking standards set out in the Draft NPPG and compares this to the current Angus minimum standards. Importantly the table also identifies the suggested thresholds from and above which the national maximum standard would apply. This is particularly important as it excludes smaller developments which make up many of the planning applications submitted in Angus. The Draft NPPG also confirms that residential development should not generally be included in maximum car parking standards.

TABLE 1 : CAR PARKING STANDARDS

Development Type	PARKING STANDARDS		
	SEDD Recommended Maximum	Angus Council Current Minimum	Threshold from and above which maximum standard applies
Retail (Food)	1/14 sqm (7/100 sqm)	(7-10/100 sqm)	1,000m ²
Retail (Non-Food)	1/20 sqm (5/100 sqm)	(3-7/100 sqm)	1,000m ²
Business	1/30 sqm (3.5/100 sqm)	(2-5/100 sqm)	2,500m ²
Cinema/Conference Centres	1/5 seats	1/5 – 10 seats	1,000m ²
Stadia	1/15 seats	NO STANDARD	1,500 seats
Leisure Facilities	1/22 sqm (4.5/100 sqm)	NO STANDARD	1,000m ²
Higher/Further Education	1/2 staff + 1/15 students	1/1 staff + 1/5-10 students	2,500m ²

- 4.6 The move towards setting maximum as opposed to minimum parking standards represents a significant change in Planning Policy. It is therefore proposed that the Director of Planning and Transport in conjunction with the Director of Roads review the parking standards for Angus for residential developments, developments below the specified size thresholds and other developments not covered by the Draft NPPG.
- 4.7 Generally Angus Council current minimum parking standards fall at or around the proposed national maximum standards. In order to assess the appropriateness in practice of the new maximum parking standards, surveys were carried out at a number of retail outlets and leisure facilities. The results of these surveys are shown in Table 2 (see Appendix A).
- 4.8 These results indicate that as far as the retail outlets are concerned there is, at present ample spare capacity in the car parks even if the maximum parking standards were to be applied. Nowadays, there is a tendency towards longer opening hours, in some cases twenty-four hours, as well as internet shopping and home deliveries. All these tend to reduce the peak parking demand. The only exception that was thrown up was at Tesco, Montrose, which probably has a high number of longer term parkers related to the town centre.
- 4.9 As far as the leisure centres are concerned, it is widely accepted that there is insufficient parking at present. The maximum standards would mean a significant increase in parking.
- 4.10 In Angus, there has been no significant demand for new Cinemas, Conference Centres and Stadia.
- 4.11 Where demand reaches a peak at certain times, customers tend to change the time of visit, thus spreading the parking demand.

4.12 On this basis it is suggested that the Council's response to the Draft NPPG:-

- requests that reconsideration is given to the proposals and that in the first instance the maximum parking standards be applied to business/higher education.

In the event that this is not accepted:-

- accepts the proposed national maximum parking standards for the designated types of development within Angus.

5 FINANCIAL IMPLICATIONS

5.1 There are no financial implications arising directly from this report.

6 HUMAN RIGHTS IMPLICATIONS

6.1 Any Human Rights issues arising from the Draft NPPG are a matter for the Scottish Executive but there are no Human Rights issues arising from this report.

7 CONSULTATION

7.1 The Chief Executive, Director of Finance and Director of Law & Administration have been consulted in the preparation of this report.

8 CONCLUSION

8.1 The introduction of maximum parking standards has been the subject of considerable discussion during the past few years. There are clearly difficulties in fixing on one set of standards which would suit the differing needs of all the Scottish authorities. The proposals in the Draft NPPG are slightly more flexible than some earlier suggestions but still represent a significant shift from the current operation of minimum standards in Angus. There are considered to be significant problems with the proposals and reconsideration is suggested.

8.2 However should the Scottish Executive be minded to proceed with the proposals then on balance the proposed maximum standards appear acceptable for development within Angus for the types of development to which the proposed standards apply.

NOTE

No background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973, (other than any containing confidential or exempt information) were relied on to any material extent in preparing the above Report.

AA/CGR/SC
22 April 2002

Alex Anderson
Director of Planning and Transport

Ronnie McNeil
Director of Roads

APPENDIX 1 : REGULATORY IMPACT ASSESSMENT

The proposed responses to questions raised in the Regulatory Impact Assessment accompanying draft NPPG 17 Addendum are set out below.

1. Options

In summary there are three options relating to standards and three options relating to responsibility for setting standards as follows:-

- Option 1 : The Status Quo – Minimum Parking Standards
- Option 2 : Non-Regulation Developer Judgement
- Option 3 : Maximum Parking Standards
- Option A : Scottish Minister's Standards
- Option B : Local Authority Standards
- Option C : Local Authority Standards with Scottish Minister's National Standards

Question 1 Are the options comprehensive, and do they express the issues adequately?

Question 2 Do you have views on any or all of the options?

Response: The options in combination cover the broad range of feasible alternatives which should be considered. In moving from the current position (Option 1B) toward the preferred position in the draft NPPG (Option 3C) it is important to provide sufficient flexibility to recognise differences between urban and rural requirements.

2. Risk Assessment

Potential risks are identified arising from insufficient car parking to accommodate demand (Options 2 and 3) or more parking than is required to meet demand (Options 1 and 2). The possible distribution of risks is also identified among those most likely to bear the risk including developers (Options 1 and 3), end users of development (Options 2 and 3), businesses in the locality of a development (Options 2 and 3), local residents (Options 2 and 3), car drivers and potential car drivers (Options 2 and 3), and those walking, cycling and using public transport (Options 1 and 2).

Question 3 Have you any views on the nature of the risks, and whether they reflect the likely distribution of potential risk among stakeholders?

Response: The risks vary in nature from potential amenity and other problems which might be experienced directly and in a very short period of time as a result of insufficient parking provision, to less immediate and longer term effects on the potential encouragement of public transport use which might result from an over-provision of parking spaces. There is also clearly a difference among the stakeholders in terms of their ability to address particular risks. Specific consideration should be given to the concentration of some facilities such as cinemas, stadia and major retail outlets in larger urban areas which mean that rural dwellers can have additional difficulties in accessing them by public transport, particularly in evenings. The setting of parking spaces below demand is likely to impact adversely on rural residents.

3. Equity and Fairness

Option 1 favours car users but does not necessarily ensure access by non car users. Option 2 has no inherent mechanisms to create an equitable position between all types of user. Option 3 tends towards benefits for those without access to a car.

Question 4 What are your views on the Equity issues?

Response: The assessment in the Addendum document correctly recognises different groups who may be affected under different options. It also notes that there are some built-in safeguards for most rural areas in that national maximum parking standards (Option 3) will be threshold related and in many rural areas the relevant developments will not reach the threshold to trigger the standards. However, as outlined in the response to Question 3 rural residents will be adversely affected by insufficient parking provision.

4. Benefits

Benefits may generally accrue to motorists under Option 1 and to developers under Option 2. The Assessment suggests that with maximum parking standards (Option 3) there are potential benefits arising for public transport investment, developers judgement, reduced competition among authorities, urban regeneration, social justice, integrated transport policy.

Question 5 Are the range of possible benefits fully comprehensive?

Question 6 Have the benefits been adequately described?

Question 7 Do you have views on the relative weight to be attached to any one or more benefits?

Question 8 Do you have any information that would enable any of these benefits to be costed in monetary terms?

Response: The Assessment is clearly weighted toward Option 3 as the preferred option. Potential benefits also need to be balanced alongside possible risks where, for example, a benefit of maintaining the status quo (Option 1) is that this is a tried and tested practice which has been operated for many years. The assessment of potential benefits with Option 3 must therefore be recognised as an optimistic view which may not be achieved in full.

5. Compliance Costs

The Assessment suggests that in broad terms Option 1 would not represent any new cost or burden, while Option 2 could impose costs depending on how the non regulated market responded, and Option 3 could potentially reduce costs borne by developers in providing car parking.

Question 9 Are the range of compliance costs fully comprehensive, or are there others that are significant?

Question 10 Have the various compliance costs been adequately described?

Option 11 Do you have any views on the relative weight to be attached to any one or more of the compliance costs?

Question 12 Do you have any detailed information on actual costs of compliance?

Question 13 Are there any significant impacts on small businesses not represented within this RIA?

Response: While it may be possible to make a broad estimate of compliance costs for a single large development such as the example of a 10,000m² office development identified in the Assessment, it is not possible to accurately quantify the possible impact on existing businesses.

6. Effect on Local Authorities

The Assessment suggests that the costs to local authorities administering the system should remain broadly unchanged.

Question 14 Are the effects on local authorities adequately and accurately described?

Response: The procedures described in the Assessment, including the proposed referral direction for applications breaching the national maximum parking standards, represent the main issues.

7. Conclusion

While the effect on specific businesses cannot be specified in detail, the Assessment suggests that provision is made for businesses with special needs e.g. 24 hour shift working, and generally costs to businesses are expected to be no worse than neutral.

Question 15 Is the conclusion justified?

Question 16 Do you have any other views on maximum parking standards?

Response: There are no specific grounds on which to question the overall conclusion.

PARKING SURVEY

LOCATIONS / RETAIL STORES	GFA * (sqm)	RATIO per 100sqm	EXISTING PARKING
ARBROATH			
SAFWAYS STORE (FOOD)	4585	8	368
BRECHIN			
SAFWAYS STORE (FOOD)	1246	8.3	104
CARNOUSTIE			
COOP STORE (FOOD)	1465	4.6	69
FORFAR			
TESCO STORE (FOOD)	4171	7.15	299
KIRRIEMUIR			
COOP STORE (FOOD)	1188	6.1	74
MONTROSE			
TESCO STORE (FOOD)	2748	10	274
BUICKS STORE (NON-FOOD)	2653	1.9	50
MONIFIETH			
TESCO (FOOD)	2322	6.4	150

APPENDIX A

PARKING SURVEY		
SPACES USED	SPACES EMPTY	USAGE
177	191	48%
66	38	64%
52	17	75%
159	140	53%
54	20	73%
201	73	72%
8	42	16%
116	34	77%

TABLE 2

SEDD MAX PARKING	USAGE
328	54%
89	74%
105	50%
298	53%
85	64%
196	102%
132	6%
166	70%

SPORTS CENTRES	GFA * (sqm)	RATIO per 100sqm	EXISTING PARKING	SEDD MAX PARKING
ARBROATH				
SALTIRE SPORTS CENTRE	2153	3	65	98
FORFAR				
LOCHSIDE SPORTS CENTRE	2075	3.3	69	94
MONTROSE				
SPORTS CENTRE	1869	2.25	42	85

* GFA – Gross Floor Area