

Subject: Interim Guidance Note 3: Residential Parking

Summary: Concerns have been raised by the Kent Developers' Group concerning the possible consequences of Interim Guidance Note 3: Residential Parking for homebuilding in Kent. This report gives the background to IGN3, describes current and planned work to address development industry concerns, and points to further consultation that will be undertaken as residential parking policies are developed at district level.

1. INTRODUCTION

Planning Policy Statement PPS3: Housing (Communities & Local Government (CLG), November 2006) requires that "Local Planning Authorities should, with stakeholders and communities, develop residential parking policies for their areas, taking account of expected levels of car ownership, the importance of promoting good design and the need to use land efficiently" (PPS3, Section 51).

In 2008, the Kent Planning Officers' Group (KPOG) asked Kent Highway Services (KHS) to prepare a response to Section 51 of PPS3. Following consultation in August/September 2008, using the Kent Design Initiative 'limited consultation list', the final document, Interim Guidance Note 3: Residential Parking (IGN3), was endorsed by KPOG and recommended to the member authorities (excluding Medway Council) for adoption for development control and local development framework purposes. KPOG also asked Kent County Council to adopt IGN3 to give it more weight. This was done by Cabinet Member Decision in May 2009.

IGN3 uses a substantial, and growing, evidence base drawn from surveys of developments constructed mainly in the past ten years. Where two cars are likely to be in use, it suggests that the parking spaces should be independently accessible because tandem arrangements are frequently underutilised. It uses evidence concerning the unreliability of garages as parking to discount their contribution where no on-street parking controls are in place. It also identifies different approaches for areas according to the presence, or otherwise, of on-street parking controls and other constraints.

Parking is the most significant issue of concern in the developments that have been surveyed, with a majority of residents giving it a negative rating in over half of the sites. Similarly, a majority of residents consider that there are parking problems in nearly two thirds of the sites. The evidence base demands a positive response, in line with the criteria contained in PPS3.

Concern about unintended consequences arising from IGN3, such as reduced densities of development, was expressed by Tony Hillier of Hillreed Homes in the Summer of 2009. This resulted in representations being made on behalf of the Kent Developers' Group, of which Tony Hillier is a member, to the December meeting of the Cabinet Scrutiny Committee (CSC). CSC directed that a Residential Parking

Workshop should be arranged to bring together developers, members and designers to discuss the implications of IGN3.

This report discusses issues raised by the Kent Developers' Group and matters covered by the Workshop held on 14 April 2010. It seeks to address the concerns and to demonstrate that further work is being undertaken to test the robustness of IGN3.

2. PREVIOUS STANDARDS & GUIDANCE

In order to understand whether there are any unintended consequences arising from IGN3, it is important to consider the residential parking standards that were in force before it was adopted/endorsed.

The previous adopted residential parking standards, which IGN3 replaced in May 2009, were contained in planning guidance supplementary to the defunct Kent and Medway Structure Plan. Below is the relevant extract from SPG4 Vehicle Parking Standards (2006):

Land Use Class C3 – Dwellings

Maximum Vehicle Parking Standards

		Car Parking
1 bedroom		1 space per dwelling
2 and 3 bedrooms		2 spaces per dwelling
Mixed Development of 1,2 & 3 bedroom		Average of 1.5 spaces across development
4 or more bedrooms		3 spaces per dwelling
Sheltered Accommodation		1 space per resident warden + 1 space per 2 units
Notes:	1. Flats and Apartment Blocks consisting of 2 and 3 bedroom units will be regarded as Mixed Developments. 2. For 1-bedroom dwellings the parking will usually be provided as a communal space. For other size dwellings part or all of the parking can be provided on a communal basis. 3. The level of car parking provision includes any garages, provided as an integral part of the dwelling or within its curtilage, and/or driveways, provided within the curtilage, subject to the preferred sizes set out in Appendix B. 4. In Controlled Parking Zones the parking provision should result in no net loss of on-street parking.	

Provision in mixed developments should be established initially on the basis of the units to be provided. There may be scope in mixed developments, particularly at higher densities, for sharing car park spaces and lower provision than the indicative average of 1.5 spaces per unit may be achieved in discussion with the local planning authority. Developments in town centres, or consisting largely of small units, may achieve more stringent standards.

(From Page 24, KMSP SPG4: Vehicle Parking Standards (July 2006))

SPG4 guidance in respect of garages and driveways included the following:

Garages

Experience has shown that garages, provided for individual residential dwellings, are unlikely to be used for the parking of a vehicle unless sufficient space is also incorporated within the garage for storage. This may have less relevance for garages that are provided as a communal facility for residential accommodation. However, the needs of the mobility

impaired, either as a driver or as a passenger, should also be considered in the design of garages and sufficient space should also be allowed to enable a garage to be used as a secure location for any cycle parking provision.

Taking these factors into account the preferred internal dimensions of a garage that should be considered for residential developments in Kent are: -

Preferred Garage Size for Single Car	5.5m (length) x 3.6m (width)
Preferred Garage Size for Two Cars	5.5m (length) x 6.0m (width)

Driveways & Manoeuvring on Site

Where parking or garaging for more than two cars is provided this should not be met by constructing the garage or parking area one vehicle wide by the number of vehicles long. Driveways associated with garages and parking areas for two cars should preferably be double width.

(From Pages 32 & 33, KMSP SPG4: Vehicle Parking Standards (July 2006))

3. INTERIM GUIDANCE NOTE 3 & SPG4

A comparison of the survey evidence base and the resultant minimum guidance levels in IGN3 with the maximum standards in SPG4 is shown below:

COMPARISON OF MAXIMUM OWNERSHIP FROM SURVEY DATA WITH SUPERSEDED SPG4 (MAXIMUM) AND ADOPTED IGN3 (MINIMUM)

BEDS	MAXIMUM FROM OWNERSHIP SURVEY DATA*		MAXIMUM STANDARDS SPG4 (superseded)		MINIMUM STANDARDS IGN3* (but see also notes & caveats)		
	NOT ALLO-CATED	ALLO-CATED			BEDS	SUB-URBAN	SUB-URBAN EDGE/ RURAL/ VILLAGE
1	0.83	1		1			
2	1.50	2		2	1 & 2	1.0	1.5
3	2.00	2		2	3	1.5	2.0
4	2.33	3		3	4+	2.0	2.0
5	2.50	3		3			

* Visitor parking not included

As can be seen, the minimum guidance levels in IGN3 are generally less than the equivalent in SPG4. As such, the provision of garages in addition to the minimum amount is welcome, especially when they are large enough for storage (of bicycles, white goods, etc.) in addition to the parking of cars (up to at least family saloon size).

In respect of the provision of two parking spaces for a dwelling, IGN3 is more flexible than SPG4 because it requires that they should be independently accessible rather than specifically side by side. Non-allocated spaces satisfy this requirement.

It appears that some developments within which parking problems are now being experienced were constructed with undersized garages and a parking provision less than the maximum levels in SPG4. IGN3 seeks to prevent the replication of these problems without affecting the reasonable density of non-urban housing schemes.

4. DEVELOPMENT INDUSTRY CONCERNS

In an e-mail dated 12 May 2010, Tony Hillier of Hillreed Homes, and as a representative of the Kent Developers' Group, asked for three specific amendments to be made to IGN3. These were reiterated in a letter from the Kent Developers' Group to Nick Chard dated 17 March (June) 2010. They are listed below.

These proposed amendments are

1. Reinstate the ability to create parking spaces in tandem by amending the requirement for all parking spaces to be independently accessible.
2. Reinstate the status of garages as counting towards the overall parking standards in an agreed way, albeit not necessarily 100%.
3. Redefine the location categories where the different standards are applied especially "Suburban" & "Suburban edge".

The background to the proposed amendments has been enlarged upon in correspondence and meetings, and at the Residential Parking Workshop held on 14th April 2010. The concerns are listed below:

- a. IGN3 will reduce the densities of future housing schemes.
- b. Garages are used by some people and should count as parking spaces.
- c. Double width driveways will have a harmful effect on layout design and density, especially in respect of pushing the frontage of dwellings further away from the street. Tandem parking should be accepted as a legitimate way of providing two spaces.
- d. Additional areas of hard paving to accommodate extra parking will increase the impermeable area of developments, exacerbating drainage problems. It will also increase costs.
- e. IGN3 is difficult to understand and implement, causing inconsistency in its use by Kent Highway Services' (KHS) officers and district planners. Interpretation of the 'zones' is particularly problematic.
- f. Kent's district councils have not collectively accepted or adopted IGN3, with or without any local changes, leading to uncertainty among designers working in some or all of Kent.

Items a. and b. are covered in Sections 2 and 3 above. Furthermore, car barns are acceptable as part of the IGN3 requirement. Item c. is oversimplified in that there are alternative forms of independently accessible spaces. Furthermore, SPG4 recognised the problems associated with the under-use of tandem parking, and the growing evidence base has done nothing to undermine that view.

Compared with SPG4, no significant addition to the impermeable areas is necessary. Furthermore, the underprovision of parking is likely to lead to the ad hoc paving over of garden space.

KHS, in the context of the Kent Design Initiative and as a statutory consultee in respect of planning proposals with highway implications, is working with district councils, developers and designers to ensure that the guidance in IGN3 is translated into schemes that will meet the Quality Audit tests of Interim Guidance Note 1. It is also assisting district council partners with the translation of IGN3 into guidance at local planning authority level, as required by PPS3. The evidence base is being developed to provide robust support for inclusion in local development frameworks.

Several district councils are using IGN3 and/or are considering translating it into a local Supplementary Planning Document (SPD). Progress towards SPD involves further public consultation, hence any parties dissatisfied with consultation in respect of IGN3, and/or concerned about how IGN3 will affect layouts, will have further opportunities to make representations. At least two districts have suggested that IGN3 should be developed into Countywide Supplementary Planning Guidance, which would also involve further and wider public consultation. This matter is being considered by KPOG, albeit the majority view thus far has been that each district should prepare its own policies and guidance, preferably based on IGN3.

5. CASE STUDIES

Two case studies, using occupied developments, were prepared by Hillreed Homes for the Residential Parking Workshop. These were intended to show that IGN3 would reduce the reasonable density of development on the sites in question. One of the case studies was used at the Workshop.

Both of the Hillreed case study sites have been the subject of a residents' survey. Both are rated negatively for parking, one significantly so. As such, the approach to parking has been shown to be inadequate in the opinion of those who live there.

The layouts have been reviewed by KHS in the light of IGN3. Both could accommodate appropriate levels of parking without the loss of units and without serious degradation of quality. Indeed, ad hoc parking in areas without adequate formal provision is itself usually a source of reduced quality of life.

'Single plot' sketches were also prepared by Hillreed Homes to demonstrate, at the most basic level, how IGN3 would affect plot sizes and urban design. In response, KHS has prepared single plot sketches to show a variety of options with less impact.

Millwood Designer Homes also submitted three case studies, one occupied and two proposed. These are to be the subject of further discussion between Millwood and KHS.

The other case study used at the Workshop was a Ward Homes scheme that is positively rated by residents for its parking. More recent examples of proposed schemes reappraised in the light of IGN3 demonstrate how people-focussed quality can be achieved without reducing the reasonable density in context.

6. DISTRICT COUNCIL APPROACHES TO RESIDENTIAL PARKING

In a report to the April meeting of KPOG, district planning authority approaches to residential parking were tabulated. More than half of Kent's 12 district councils are using IGN3 to some degree. Two have adopted it as a material planning consideration, while two others are using it as the basis for more detailed guidance that will be subject to further consultation. Of the three districts whose responses were not included in the report, two are known to be using IGN3 to some extent.

Ashford Borough Council has prepared detailed residential parking guidance, in the form of a draft SPD, which is now out to consultation. This draft SPD is based on IGN3. Such detailed development of IGN3 fulfils the requirements of PPS3 and provides developers and designers with a further opportunity to comment on new, design-led approaches that are aimed at preventing parking problems in future developments.

PPS3 places the onus on local planning authorities (- the district councils in Kent -) to prepare residential parking policies. While KCC could, with district support, undertake further work (including consultation) to develop IGN3 into Supplementary Planning Guidance, it is likely that districts will choose to work locally. To this end, KHS has offered to help with the local interpretation through the Local Development Framework process.

7. WORKING WITH DEVELOPERS, DESIGNERS AND DISTRICTS

The 2009 "Kent Design on the Road" workshops included discussions with each of Kent's district planning authorities concerning IGN3 and its relevance to Quality Audits (Interim Guidance Note 1). All districts have been invited to have further discussions about the local interpretation of IGN3, and several have accepted.

The KPOG Homebuilding Industry Joint Liaison Committee has been a forum for discussion about the post occupation surveys and the use of IGN3. As with district councils, developers and designers have been invited to have further discussions about the guidance. This tends to be happening in the context of actual planning proposals, with layouts successfully incorporating IGN3 parking levels without detriment to quality or density. It is important to note that members of the Joint Liaison Committee have not raised concerns about IGN3 at meetings held subsequent to its approval.

The Kent Developers' Group has expressed concern about its limited engagement with Kent's local authorities over planning matters. KPOG representatives have met with Group representatives to address this concern, and to see if the work of the Joint Liaison Committee can embrace Group members and issues.

The Residential Parking Workshop held on 14th April 2010 demonstrated the need for further engagement between the Kent Design Initiative and developers. This is in hand, and will cover a range of subjects including Quality and Parking.

8. TESTING THE ROBUSTNESS OF IGN3

In response to the Kent Developers' Group's concerns, Kent Highway Services and the Kent Design Initiative are working on case studies. These include assessments of sites put forward by two of the Group's members, single plot options, and sites in Kings Hill. The latter will be assessed by an independent layout architect in order that the design quality implications are considered alongside the numerical aspects.

Ashford Borough Council's draft SPD includes many very helpful diagrams and drawings. Similarly, Car Parking: What Works Where (English Partnerships, May 2006) contains the visualisation of various parking solutions. The 'robustness testing' exercise described above may also yield some useful material.

It has been suggested that concern about the implications of IGN3 is being fuelled by its complexity. Residential parking is a complex subject, but the various ways towards better understanding described in Sections 4 – 8 of this report are already bringing clarification. The reasons for past failure are by no means straightforward, but through collaborative working it should be possible to reduce the incidence of parking problems in future developments.

9. CONCLUSIONS

Interim Guidance Note 3: Residential Parking is an evidence based response to Planning Policy Statement PPS3: Housing. It seeks to address known problems without simply increasing the amount of parking required. Indeed, compared with previous guidance, the minimum levels in IGN3 are mainly lower. However, the focus of IGN3 is on how parking is provided, such that it is more convenient to use and makes the best use of the land available. Additional parking in the form of garages and 'non qualifying' tandem spaces is not excluded.

There is no clear evidence to support the view that properly designed developments must be less dense to incorporate IGN3 parking levels. However, there is clear evidence to the effect that the approach to parking of the past decade has left many developments with parking problems. Furthermore, many developments are already being designed using IGN3 levels and the Quality Audit approach.

Developers wishing to provide parking below the evidence based expected levels of IGN3, and/or in a form that is unlikely to attract full use under normal circumstances, could decide to keep their developments private and control all parking in the streets. There are legal mechanisms for such situations which are designed to protect occupiers against inadequate maintenance and street cleaning. However, not only would such developments be likely to require frequent intervention by private parking management companies to be successful, they may also have an adverse impact on neighbouring streets.

In the light of the above, KHS will continue to work with all development industry partners to achieve the benefits to quality of life in future residential streets that IGN3 has been prepared, endorsed (by KPOG) and adopted (by KCC, and others) to achieve.