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**To:** Environment, Highways & Waste Policy Overview & Scrutiny Committee – 29 July 2010

**Subject:** Interim Guidance Note 3: Residential Parking

**Classification:** Unrestricted

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**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 advises members of how Kent Highway Services and the Kent Design Initiative are working with development partners to test the robustness of IGN3, and points to further consultation that will be undertaken as residential parking policies are developed at district level.

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## 1. INTRODUCTION

Interim Guidance Note 3: Residential Parking (IGN3) is an evidence based response to the requirement 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" (Planning Policy Statement PPS3: Housing, Section 51). It has been endorsed by the Kent Planning Officers' Group (KPOG) and recommended to Kent's district planning authorities for development control and local development framework purposes. It was adopted by Kent County Council (KCC) by Cabinet Member Decisions in May 2009, replacing previously adopted guidance in the 2006 Vehicle Parking Standards (SPG4 of the Kent and Medway Structure Plan).

In surveys covering over 200 recent housing developments across Kent, parking is the biggest single issue of concern to residents, with a majority reporting problems in more than half of those sites. Neighbour disputes, obstruction to pedestrians, concerns about emergency service access and damage to highway areas are among the implications. However, the survey results also show that it is mainly the design and use of parking and streets that causes these problems rather than the amounts themselves.

Members of the Kent Developers' Group have raised concerns about the impact of IGN3 on the density of future housing schemes. In practice, IGN3 is already being implemented successfully at a site specific level without a loss of units or quality. More than half of Kent's districts are using IGN3 to some degree, and Ashford Borough Council is now consulting on a residential parking Supplementary Planning

Document based on IGN3. However, further work is in hand to show that IGN3 will help to reduce the incidence of parking problems without affecting reasonable densities of development.

A more detailed report, which includes details of the previously adopted standards (SPG4) and feedback from the Residential Parking Workshop held on 14<sup>th</sup> April 2010, is included at Appendix 1.

## **2. THE KENT DEVELOPERS' GROUP'S REPRESENTATIONS**

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 way that residential parking is provided is as important as the amount. IGN3 identifies minimum amounts and design parameters for situations with no on-street parking controls, the former being generally below the maximum standards that IGN3 superseded. As such, less reliable forms of parking such as garages and tandem spaces are acceptable in addition to the minimum amounts. Furthermore, because IGN3 is interpreted at a site specific level, development teams have flexibility when considering parking in the context of overall Quality Audit issues.

There is 'common ground' over the need for streets to be better able to cope with parking, to meet the reasonable needs of visitors and also those of a limited number of residents. In simple terms, this means that non-urban streets should no longer be 'designed down' to the bare minimum for vehicle movement. In practical terms, it means that well-designed, sometimes wider streets should be provided as high quality places within which people can move and meet, and also park responsibly. In this respect, materials and layouts, including boundary treatment and kerb types, will have a strong influence over how the spaces look and are read by users. The Kent Design Guide encourages this approach.

Kent Highway Services (KHS) is working with the district planning authorities to identify the zones within which the different approaches to residential parking should apply. The survey evidence underpins this work.

## **3. FURTHER CONSULTATION AT DISTRICT LEVEL**

Ashford Borough Council has prepared detailed residential parking guidance, in the form of a draft Supplementary Planning Document (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.

#### **4. TESTING THE ROBUSTNESS OF IGN3**

In response to the Kent Developers' Group's concerns, KHS 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 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.

#### **5. RECOMMENDATIONS**

Interim Guidance Note 3: Residential Parking is an evidence based foundation for local planning authorities' "residential parking policies" required under Section 51 of Planning Policy Statement PPS3: Housing. Further public consultation will be undertaken as Kent's district councils respond to PPS3, as is already happening with Ashford Borough Council's draft Supplementary Planning Document.

It is therefore recommended that the Policy Overview and Scrutiny Committee should:

- a) Endorse the testing of the robustness of IGN3 described in Section 4 and receive a report on the outcomes when they are available.
- b) Acknowledge the concerns of the Kent Developers' Group, and the work that is being undertaken to address these concerns, and encourage further dialogue at appropriate levels to understand the actual implications of and opportunities presented by IGN3, and its interpretation at local level.
- c) Note that public consultation on Ashford Borough Council's draft Residential Parking SPD offers developers and designers an opportunity to make further representations on the implications of 'IGN3 based guidance', having regard for the need to address the problems of some past approaches.

- d) Acknowledge the widespread concern among residents concerning parking in recent residential developments, and the social and cost implications arising from the problems caused, and welcome collaborative working approaches that are seeking to avoid replication of these problems in future developments.

## APPENDIX

Appendix 1 – Detailed report on background to IGN3 and responses to the Kent Developers' Group's concerns.