FUTURE
MoleValley

EVIDENCE PAPER: PARKING

January 2020

Contents

1. Introduction

1.1. This evidence paper has been prepared by Mole Valley District Council (MVDC) to underpin the Draft Local Parking Standards Supplementary Planning Document (SPD). This document provides a planning policy context with regards to parking provision from new developments and explores the evidence and considerations that will underpin Mole Valley's future parking standards, including the application of minimum and maximum parking levels.

2. Policy Context

National Policy

2.1. The National Planning Policy Framework (NPPF) 2019 sets out the Governments national planning policies to promote sustainable transport. Specifically on the subject of parking, Paragraph 105 of the NPPF states:

"If setting local parking standards for residential and non-residential development, local planning authorities should take into account:

- *The accessibility of the development;*

- *The type, mix and use of development;*

- *The availability of and opportunities for public transport;*

- *Local car ownership levels, and;*

- *The need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles."*

2.2. Subsequently, Paragraph 106 of the NPPF states:

"Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport. In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists."

2.3. There is no planning guidance with regards to how local planning authorities should take into account the five factors listed in Paragraph 105 of the NPPF. There is also no guidance on demonstrating 'clear and compelling justification' for implementing maximum parking standards.

Local Policy

2.1. Surrey County Council (SCC) adopted its third local transport plan for the county, known as the Surrey Transport Plan (LTP3), in 2011 and covers the period to 2026. LTP3 recognises and identifies how parking is seen to influence congestion (for motor-vehicles) and contains a parking strategy with the objectives of reducing congestion caused by parked motor vehicles and making best use of parking spaces available. The parking strategy intends to achieve these objectives by encouraging the provision of suitable amounts of off-street parking from new developments and maximising the use of existing off-street parking.

2.2. To help deliver the parking strategy objectives, SCC has produced guidance on the amount of parking spaces provided for new development. The document 'Vehicular and Cycle Parking Guidance' was published in 2012 and updated January 2018 for use by local planning authorities in Surrey. This document, referred to as LTP3 Parking Guidance, is currently used by MVDC as the starting point for planning decisions about the level of parking provision for proposed developments.

2.3. Apart from MVDC, all the other local planning authorities in Surrey have their own adopted local parking standards. Their standards either in part or fully replace the LTP3 Parking Guidance. In most cases, only the vehicular parking standards for residential development differs from the LTP3 Parking Guidance.

Future Mole Valley

2.4. MVDC is preparing a new Local Plan titled Future Mole Valley that will guide development and land use in Mole Valley and form the basis on which planning applications will be decided. The emerging Local Plan policy on transport and parking will require the parking in new developments to be provided in accordance with local parking standards. These local parking standards are set out in this SPD.

Neighbourhood Plan Policies

2.5. MVDC has four Neighbourhood Development Plans that form part of the adopted Local Plan and are used in the determination of planning applications for those Neighbourhood Areas. The four Neighbourhood Areas are: Ashtead; Bookham; Capel Parish (includes Capel, Beare Green and Coldharbour); and Westcott. Each NDP contains a policy on the level of car parking to be provided by new development:

- Ashtead NPD Policy AS-H6 - Off Street Parking: This policy sets out minimum standards of vehicular parking to be provided by residential developments. The policy also says that for housing developments comprising 10 or more dwellings should allocate visitor car parking on site to an additional 20% of the figure calculated against the minimum standards.

- Bookham NDP Policy BKH3 - Parking Space Standards: This policy sets out minimum standards for off-street vehicular parking and that provision should be made to park and store bicycles at all new residential developments. The policy also says that permeable surfaces for parking areas should be used according to MHCLG guidance.

- Capel Parish NPD Policy CA-ESDQ9 - Traffic Calming / Parking: This policy doesn't set parking standards like the other NDP's but says that new residential developments should provide discreet car parking within a landscape setting. Supporting text in Paragraphs 4.8.43 and 4.8.44 also set out a number of car parking principles to be incorporated into developments.

- Westcott NDP Policy WNDP4 - Parking Provision: This policy sets minimum car parking standards on new residential developments within the village core. The policy also says that for housing developments comprising 10 or more dwellings should allocate visitor car parking on site to an additional 20% of the figure calculated against the minimum standards. The policy also says that development proposals that deliver additional parking above and beyond the needs of the proposed development will be supported.

3. Parking Considerations for New Development

3.1. Paragraph 105 of the NPPF sets out five bullet points and factors for local planning authorities to take into account when setting local parking standards, as shown in paragraph 2.1 above. Each of those five factors is addressed below.

Accessibility of the Development

3.2. This factor refers to the location of the development to access shops, services, employment opportunities as well as community and leisure facilities. The ability and availability of public transport to access these facilities is discussed under another heading: Availability of and Opportunities for Public Transport.

3.3. SCC's LTP3 Parking Guidance sets differing standards for residential car parking depending on the broad location of the development: Town Centre; Edge of Centre; Suburban; and Suburban Edge / Village / Rural, though the document does not identify where these areas are. The standards allow the maximum number of parking spaces per dwelling to increase the further out from the town centre the development is. This relates to the accessibility of the development as town centres are the locations with the greatest access to shops, services and community facilities whereas the suburban edge, villages and rural areas tend to have limited access to services and facilities. Therefore town centres have less need to provide vehicular parking whereas the latter broad location has a need to provide more vehicular parking so residents can travel to access these services and facilities.

3.4. SCC produce isochrones maps showing the average travel time to specific facilities and places using public transport. The specific facilities used are industrial commercial areas, GP surgeries, primary schools, secondary schools, town centres and hospitals with an accident and emergency service. However, these facilities only refer to those within Surrey and don't take account of facilities in other counties, which may better serve settlements in the edge of the county border. SCC also produced isodistance maps showing the time taken to travel by car to Dorking and Leatherhead, considered to be the only two towns in the district.

3.5. Dorking and Leatherhead are the most accessible locations within the district, followed by Ashtead, Bookham and Fetcham. The isochrone and isodistance maps show villages along the east-west and north-south road and rail corridors i.e. settlements on or adjacent to the A24, A25, North Downs rail line and South London Suburban rail line, are also relatively accessible.

3.6. The villages and rural communities not along the aforementioned transport corridors tend to have poor access by public transport to facilities. However, in a couple of these villages, there is relatively good public transport accessibility to one or two facilities. For example, Newdigate has relatively good public transport accessibility to a primary school and GP, but poor access to other facilities. The worst places in terms of accessibility are rural communities, mostly in the south-west of the district such as Walliswood and Oakwoodhill, but Leigh and Headley have poor public transport access to facilities as well.

3.7. The isodistance maps show that travel between Dorking and Leatherhead to Charlwood takes longer than 30 minutes and the isochrone maps show that accessibility to key facilities by public transport from Charlwood is also relatively poor. That said, the isochrone maps are produced by SCC and don't take into account facilities beyond Surrey, so if facilities at Horley and Crawley were considered, Charlwood may have good public transport access to these facilities.

3.8. This evidence shows that settlements and locations in Mole Valley vary widely in terms of accessibility to services and facilities. As such, it's necessary to manage the local road network to take account of the accessibility factor. LTP3 Parking Guidance is proof of this, assigning standards depending on the broad location of residential development. However, an SPD would make this more specific to Mole Valley to better take account of the Districts individual settlements and their qualities.

Type, Mix and Use of Development

3.9. The different types, mixes and uses of development will have a bearing on the amount of car parking that will be required, particularly for commercial developments. This is because commercial developments vary in use, size, and location and in needs. For example, a small scale hot food takeaway outlet will require short-stay parking for customers whereas an office will require long-stay parking for staff.

3.10. The LTP3 Parking Guidance employs the planning use classes to set out the level of vehicular parking provision for commercial and residential development, with further division based on the type of use and the size of the development. This mostly applies to commercial development but there is also different standard for C3 residential development if a proposal comprises older persons sheltered accommodation.

3.11. In the LTP3 Parking Guidance the maximum vehicle and minimum cycle parking standards for A and B use class development is mostly based on the number of spaces per m^2 with reductions or abstentions depending on location e.g. for the A3 use class the maximum vehicle parking standard is 1 space per $6m^2$ except in town centres where there should be zero provision. There is also a maximum standard for lorry spaces in relation to B8 uses, also set at the number of spaces per m^2.

3.12. For the C and D use classes, the maximum vehicle and minimum cycle parking standards in the LTP3 Parking Guidance is based on a feature related to the use. For example, the maximum vehicle parking standard for Golf Clubs and driving ranges (within the D2 use class) is 1 car space per 0.3 holes or per driving bay or individual assessment / justification. For all the uses stated within the C and D use classes, all have their own unique standard or require an individual assessment / justification.

3.13. It's important to note that the need for vehicle and cycle parking by different commercial uses is influenced by the accessibility of the development and the availability and opportunities for public transport. Town centres often have a number of public parking areas so town centre businesses don't necessarily need to provide their own parking facilities, unless there is an under provision of town centre parking. As such, the LTP3 Parking Guidance tends to be more relevant to commercial development located outside town centres where there isn't any existing parking provision. Local planning authorities tend to resist commercial development outside existing commercial areas i.e. out-of-town shopping centres for A1 retail and B use class development outside of existing business parks and industrial estates. However, for some commercial uses within the D use class, it may be preferential for the development to take place outside of existing commercial centres or a settlement entirely.

Availability of and Opportunities for Public Transport

3.14. The 2011 Census collected data on the 'method of travel to work'. It showed that for the Mole Valley District 6,253 people use public transport[1] to travel to work,

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[1] 5,486 by train; 614 by bus, minibus or coach; and 153 by underground, metro, light rail or tram.

most of which, 5,483 people or 88%, travel to work by train. The number of people who travel to work using public transport equates to roughly 13.4% of the 46,703 people in the District who worked at the time of the Census. The proportion of people in work who use public transport to travel to work is roughly 16.8% in Surrey, 12.1% in the South East (excluding London), and 16.9% nationally. Likewise, much of this is done so by train.

3.15.   The District has three railway lines running through it and ten railway stations. The train operating companies that provide services on these lines are: South Western Railway, Southern and Great Western Railway. The line traversing the District north / south provides is used by South Western Railway for services between Dorking and London Waterloo, and Southern for services between Horsham and Dorking and London Victoria. South Western Railway also operates the service between Guildford and London Waterloo via Leatherhead and Bookham. Great Western Railway are the operating company for services along the North Downs Line which traverses the District east / west, linking Reading and Guildford to Redhill and Gatwick Airport.

3.16.   According to the Office of Rail and Road's estimates of train station usage[2], the train station with the most entries and exits in 2016/17 is Leatherhead, with over 2million entries and exits. After that, the most used train stations, both with more than a million entries and exits are Ashtead (1.32M) and Dorking (1.16M). Bookham and Dorking Deepdene are the only train stations where the total entries and exits in 2016/17 are in six figures: 331,782 and 398,912 respectively. All other train stations in the District have less than 100,000 entries and exits per year, though Box Hill & Westhumble train station was only just below 100,000 in 2016/17 and was above 100,000 the year before. The least used train station in the District is Betchworth with circa 15,000 entries and exits in 2016/17. It is also worth noting the 58,228 entries and exits in 2016/17 at Gomshall train station as, though it isn't in the District, it is located only just beyond the western boundary and is the most accessible train station for some of the District's settlements e.g. Abinger Hammer. The data shows that the most used stations are on the north-south London Suburban train line and in particular the stations in the three largest settlements: Ashtead, Dorking and Leatherhead.

3.17.   According to the Existing Transport Trends & Constraints document, prepared by SCC for MVDC, the urban areas of the District benefit from relatively good coverage of bus routes and services, with Dorking and Leatherhead serviced most frequently. However, a large part of the district is rural and these areas do not have as great a provision of scheduled bus services so there are known gaps in bus service coverage and lack of frequency on routes. To overcome this, the Mole Valley Demand Response Service was set up, collecting passengers from their place of residence if they live in Bookham, Fetcham or the Districts rural areas and transporting them to anywhere else in the District and as well as destinations in neighbouring local authorities.

3.18.   SCC also examined the proportion of bus services running to schedule during peak hours and found that in 2015/16 only 50% of buses arriving at the North Street bus stop in Leatherhead and 57% of buses arriving at the White Horse bus stop in Dorking were on time. Compared to 77% across Surrey and SCC's target of 95%, bus reliability in the District is below standard. Key contributing factors as to why bus services may not be running to schedule are congestion on the highway network, as well as vehicles parking illegally on narrow sections of carriageways and in bus stops. Unreliable bus services cost more to run but also discourages passengers from using them, especially where real time passenger information is not provided. Suggestions

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[2] Office of Rail and Road's estimates of train station usage

offered for improvement include more stringent parking enforcement on bus routes and bus stops facilitated with real time passenger information.

3.19.   Bus services in the District are relatively unreliable and restricted, which explains why only 1% of commuters use buses to travel to work, whereas nearly 12% of commuters travel to work by train. The availability and opportunities for public transport strongly relate to accessibility, with the Dorking and Leatherhead being the settlements with the most availability and opportunities for public transport, whereas rural areas experience limited public services, particularly those without a train station or bus stop.

Local Car Ownership

3.20.   2011 Census data shows a high proportion of households in Mole Valley, 88%, have access to a car or van, in comparison to 87% for Surrey, 81% for the South East region (excluding London) and 74% for England. Mole Valley households also have greater access to two and more cars or vans, 49%, in comparison to 47% for Surrey, 40% for the South East (excluding London) and 32% for England. This suggests car availability in Mole Valley is high, and much higher in comparison to the national average and local authority areas beyond the South East.

3.21.   2011 Census data also showed that, at the time, there were 35,828 households in Mole Valley District and 56,112 cars or vans in the District, equating to roughly 1.6 cars or vans for every household. By comparison, there are 1.5 cars or vans per household in Surrey and roughly 1.2 cars or vans for every household in England. In all three circumstances there are more cars or vans than households, though the District's ratio of cars or vans to households is higher than the counties ratio and considerably higher than the ratio for England.

3.22.   Census data on the method of travel to work shows 26,378 of people living in the District travel to work by car or van[3], which is roughly 62.2% of people to travel to work. Similarly the proportion who travel to work by car in Surrey is 62.8%, 65.5% in the South East region (excluding London), and 62% for England. The proportion of people who travel to work by car or van is considerably higher than the next best mode of travel to work; 13.4% by public transport.

3.23.   When the method of travel to work dataset is compared against the car availability dataset, they suggest that while the number of households in Mole Valley who use a car is high, either those who work that have access to a car or van don't necessarily use it to travel to work, or the number of people who don't work but use a car is high. Both may be possible:

- Mole Valley District is served north-south and east-west by train and has direct train services to central London. Indeed, the majority of Mole Valley residents using the train to travel to work are travelling to workplaces in central London[4]. This means train travel may provide a better alternative to the car for travelling to central London for work. Though, as discussed above, travelling to work by car or van (62.2%) is by far the preferred method.

- There are a high proportion of older persons living in the District. The Labour Market Profile of the District[5] shows that 23% are aged 65 and over whereas the proportions for the South East and Great Britain are 18.9% and 18.1%

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[3] 24,906 people drive a car or van and 1,472 people are a passenger in a car or van.
[4] Existing Transport Trends & Constraints, March 2017: Paragraph 3.6.3.
[5] Figures from ONS NOMIS: Labour Market Profile for Mole Valley District.

respectively. The proportion of retired persons in the region (15.4%) is higher than the national average (13.4%).

Provision for Charging Plug-in and Other Ultra-low Emission Vehicles

3.24.   The UK has seen a rapid growth in ULEVs since they were first registered in 2010, with more than 100,000 ULEVs currently registered by the Driver and Vehicle Licensing Agency (DVLA)[6] and an electric car registered every 3 minutes in the first 3 months of 2017[7]. The take-up of ULEVs is expected to grow further through government support and additional investment and development of ULEV technology.

3.25.   Localised data, based on the VEH0206 dataset, was provided by the Department for Transport (DfT) showing the number and proportion of licensed cars by CO_2 emission band in Mole Valley District since 2001. While the total number of licensed cars has increased year on year between 2001 and 2016, the average CO_2 produced by them has decreased year on year from 190.8g/km in 2001 to 157.9g/km in 2016. The number and proportion of licensed cars producing more than 186g/km CO_2 (highest four emission bands) has been decreasing since 2011/12 and there has been accelerated growth in the take-up of licensed cars in the lowest four emission bands (130g/km and less) since 2011/12. Based on the current growth rate of roughly 0.8% per annum within the 1-100g/km CO_2 bracket, the proportion of the District's licensed vehicles within this CO_2 bracket will be 17.2% by 2033. However, the annual growth rate will likely increase with further investment and development in ULEV technology, so the proportion of ULEVs in Mole Valley will likely be higher than 17.2%

3.26.   While the take-up of ULEVs in Mole Valley is increasing relatively quickly, they currently make up just 3.6% of the total vehicles in the District. As a result, the availability of plug-in charging points in the District is limited. Research[8] shows there are a total of 20 charging points across three locations in the District: 8 at Dorking train station; 8 at Kelvin House in the Leatherhead Office / Research Park; and 4 at Ashtead train station. SCC is preparing an Electric Vehicle Strategy which will form part of LTP3 that aims to develop a network of public charging points across the county. A key part of achieving that objective is to require charging points as part of residential development proposals as per LTP3 Parking Guidance.

4. Maximum and Minimum Parking Standards

Policy Context

4.1. As set out in paragraph 2.1, the NPPF stipulates that:

"Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport."

4.2. The LTP3 Parking Guidance was updated in January 2018, however the maximum and minimum levels of car and cycle parking remain unchanged from the previous iteration of the guidance (published 2012). These levels were not produced in accordance with the NPPF but in accordance with the now withdrawn planning policy statements and guidance. The withdrawn Planning Policy Statement 4 recommended local planning authorities should set maximum vehicular parking levels for non-

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[6] DVLA Vehicle Licensing Statistics
[7] British Parking Association (BPA): A Blueprint for Parking 2017-2022
[8] National Chargepoint Registry and ZapMap websites

residential developments and not set minimum parking levels other than for cycle parking and disabled parking. While Planning Policy Statement 4 has been superseded by the NPPF, SCC considers the LTP3 Parking Guidance accords with the NPPF in its approach for flexibility and application according to local circumstances. In other words, the LTP3 Parking Guidance still implements maximum parking standards despite the NPPF now requiring 'clear and compelling justification' to setting maximum parking standards.

4.3. The parking standards used by each of the other local planning authorities in Surrey all apply minimum cycle parking levels and maximum vehicular parking levels on non-residential developments, other than Waverley which applies no vehicular parking levels on non-residential development. However, the biggest difference between the authorities is the application of vehicular parking levels on residential developments, which are summarised in the table below. As can be seen, the authorities adopt either maximum or minimum levels but can be varied depending on certain factors, in particular whether a development is within a town centre location.

Table 1: Other Surrey Boroughs / Districts Vehicular Parking Levels for Residential Developments

Surrey borough / district	Vehicular parking levels on residential developments
Elmbridge	Maximum levels apart from areas of high parking stress where one parking is a minimum requirement.
Epsom & Ewell	Minimum levels but with lower minimum levels applied to Epsom town centre.
Guildford	Maximum levels for developments of 10+ dwellings and advisory for smaller developments (less than 10 dwellings). The new Local Plan indicates that a parking supplementary planning document will be brought forward which may set maximum levels in Guildford town centre.
Reigate & Banstead	Maximum levels for developments of 20+ dwellings but minimum levels for smaller developments (of less than 20 dwellings).
Runnymede	Maximum levels with lower maximum levels for town centres.
Spelthorne	Minimum levels with lower minimum levels for town centres.
Surrey Heath	No levels.
Tandridge	Maximum levels.
Waverley	Minimum levels with lower minimum levels for town centres.
Woking	Minimum levels but provision below these levels will be considered for development proposals in Woking town centre.

4.4. The Draft New London Plan intends to use maximum vehicular parking standards for residential, office and retail development. The Draft New London Plan also included a parking level whereby residential developments in certain areas should be car-free.

4.5. The Ashtead, Bookham and Westcott NDP's, which form part of MVDC's adopted Development Plan, require new developments to provide a minimum level of car parking. The minimum levels for the three NDPs are set out in the tables below.

Table 2: Ashtead NDP Minimum Parking Levels

Dwelling Type	Number of Parking Spaces
1 & 2 bedroom flats	1 space per flat
1 & 2 bedroom houses	1+ space per house
3+ bedroom dwellings	2+ spaces per dwelling

Table 3: Bookham NDP Minimum Parking Levels

Dwelling Type	Number of Parking Spaces
Bedsits & 1 bedroom dwellings	1 space per dwelling
2 & 3 bedroom dwellings	2 spaces per dwelling
4+ bedroom dwellings	3 spaces per dwelling

Table 4: Westcott NDP Minimum Parking Levels

Dwelling Type	Number of Parking Spaces
1 bedroom dwellings	1 space per dwelling
2+ bedroom dwellings	2 spaces per dwelling

Justification for Setting Maximum Vehicular Parking Levels

4.2. Maximum car parking standards have been established because high availability of car parking will increase car use (because drivers know they can park) and in turn lead to more vehicular congestion[9]. This phenomenon is known as induced demand / traffic and is an effect that is debated when considering building new roads and increasing road space to relieve congestion. According to the Campaign for Better Transport, when a new road is built, new traffic will divert onto it and many people may make new trips they would otherwise not make, and will travel longer distances just because of the presence of the new road, so the predicted congestion benefits of a new road are quickly eroded[10]. The same phenomenon can be applied to increasing the availability of car parking spaces. The issue here is that increasing car use may undermine local and central government initiatives to promote and support the delivery of more sustainable modes of transport.

4.3. Conversely, the lack of available off-street car parking (for both residents and visitors) results in on-street car parking which in turn leads to a reduction in the amount of road space available for through traffic, creating bottlenecks, reducing traffic flow and increasing journey times[11]. This is the reasoning behind setting minimum car parking standards, particularly in NDP's prepared by local residents as they are most affected by on-street parking problems. Some NDP's have policies which also require developments to meet visitor car parking requirements and Westcott NDP says that developments that propose car parking above and beyond the minimum standards will be particularly supported.

4.4. Woking Borough Council (WBC) adopted a Parking Standards SPD that requires minimum parking standards for residential developments. They justify this because of the high number of households requesting dropped kerbs to enable off-street parking, which has resulted in increased hard-standing, increased surface water run-off and a negative impact on the aesthetic and character of the street scene. WBC considers these factors demonstrate the negative implications of under-provision of residential parking.

4.5. Despite the desire to implement minimum standards, it is worth noting an appeal decision[12] in Ashtead was allowed in spite of the proposed parking provision being below the minimum standard required by Ashtead NDP Policy AS-H6. The Inspector said that the site has good access to services, facilities and employment and there

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[9] LTP3: Problems and Challenges August 2017: Paragraph 2.24
[10] The Campaign for Better Transport: 'New roads create new traffic'
[11] LTP3: Problems and Challenges August 2017: Paragraph 2.24
[12] Appeal Ref. APP/C3620/W/17/3187875, Application Ref: MO/2016/1934.

are practicable alternatives for travel other than by the private car for future occupiers of the proposed development. Consequently, it was realistic to assume that occupiers would not necessarily need to own a car in this location in order to provide for their day to day needs. Overall, the Inspector felt that the shortfall in parking provision in this instance would result in at worst only modest harm upon local highway conditions and the general environment around the site and was satisfied it was in accordance with Local Plan policies and the NPPF.