Response to Transport Scotland's Consultation on Station Car Parking Policy in Scotland

Introduction

We welcome this opportunity to comment on Station Car Parking Policy in Scotland and it is hoped our response to your consultation will assist you with the development of appropriate policy and guidance.

Policy Development

Transport is crucial for connecting people between their homes and locations where there is employment, training, education, health facilities, services, shopping, recreation etc.

New national Station Car Parking Policy and guidance for Scotland should take into consideration the following three strategic outcomes of the NTS which were endorsed by the current Scottish Government and are aligned to the Government's central Purpose.

- Improve journey times and connections, to tackle congestion and the lack of integration and connections in transport
- Reduce emissions, to tackle the issues of climate change, air quality and health improvement
- Improve quality, accessibility and affordability, to give people a choice of public transport where availability means better quality transport services and value for money or an alternative to the car.

Encouraging modal shift to sustainable travel modes such as the train, bus, walking and cycling will be crucial to delivering the Government’s outcomes. However, experience has shown that effecting model shift is difficult. It is very difficult to get people out of their cars. Clearly cultural changes such as flexible working, home working and internet shopping will reduce and should peak spread commuter travels. But to date these developments have at best had a marginal effect. It is therefore all the more crucial that proven tools such as Park & Ride are employed to their full advantage.

The rail system provides a mass transit system for strategic and local connections throughout Scotland. The capacity of the rail network to take more passengers is limited by train capacities, platform lengths, limited rolling stock, congestion on the rail network and priority routing paths for intercity trains. The rail network needs to be developed and improved to cater for existing and future travel demand. Wherever possible, park & ride should be provided at stations to satisfy passenger demand.

While policy should consider the interests of the rail network and industry partners it should also take cognisance of wider transport issues and policy so that transport is developed and managed in an integrated manner.

There will be no simple ‘one size fit all’ solution for deciding when parking should be provided, how it should be maintained or whether charges would be appropriate. Parking policy and any options for charges should take into consideration the different demographic, economic and operational characteristics of the area served by rail facilities.
Parking Demand and Provision
Since local government reorganisation we have increased our Park & Ride car park capacity in South Lanarkshire from 599 in April 1994 to 2014 spaces in March 2009. This 336% increase in car spaces at stations has proved to be very successful in encouraging car drivers to travel by train. The additional car parks meet modern design standards including CCTV, lighting and disabled access. We are currently developing proposals for a further 300 additional spaces. In some locations we have had to transfer land to Network Rail and they have taken over the maintenance responsibility, funded through SPT or Transport Scotland. In other locations we have retained ownership of the facility and undertake our own maintenance. We have not introduced parking charges to any of our car parks to help deliver a modal shift to trains services.

Some of the issues raised and the resulting questions seem very ‘subtle’ and ‘refined’ considering the lack of research and knowledge of the psychology of travel. What is clear is that we require to make public transport more attractive by making it more accessible, reliable, frequent and affordable. The overall quality of the travel experience needs to be improved.

It is currently difficult to forecast demand for Park and Ride facilities when there is no existing provision or where consideration is being given to providing for future Park and Ride demand. However, we have undertaken surveys of existing Park & Ride and on street parking and used this to forecast capacity requirements. Even having done this, we have found that demand can exceed expectations. This confirms there is clear demand for Park and Ride and that suppressed demand can be a real issue at some locations.

Park and Ride should be considered from a national, regional and local perspective. From a strategic point of view, Park and Ride should be located such that it intercepts main travel movements into the conurbation. Ideally there should be outer and inner rings of Park and Rides around our large cities and towns and these should preferably be coordinated with demand management measures to limit car travel into centres and/or parking controls. Typical parking policies within large settlements should discriminate against long stay, favouring maximum 4 to 5 hour shopping/business trip users. Parking policy should also take into consideration local parking policy along the route of train services so that they are complimentary rather than be conflicting.

Where possible (even at a high capital cost) there should be sufficient capacity to meet am peak demand plus some off-peak demand. Catering for the off-peak demand is less important, since if these individuals do decide to use their cars, they will be using the road network off-peak.

Even if the expansion of Park and Ride just satisfied the existing supressed demand, it would at least be achieving modal shift during the most crucial peak times when congestion, delays and pollution are greatest.

Expansion of car parking provision does not just service suppressed demand. It creates important opportunities to encourage a mode shift from car to rail travel.

Creating more space at a particular time (pre 9am) by pricing interventions will not necessarily just service ‘pre 9am’ suppressed demand. Passengers who do not currently take their car to the station because of lack of spaces in the peak travel
period now would. If there is a lack of Park and Ride capacity for off-peak travellers then this is the result of under provision in the first place.

It is proposed by Passenger Focus that by showing parking space availability in real time on websites/text services would allow passengers to make informed choices, avoiding use of alternative modes because they think the station car park is full. This might only be crucial where parking supply is limited and there are options for drivers to divert to an alternative facility. If drivers regularly find their car park full or are informed by a sign that it is full then they may select an earlier arrival time so they can get a space or they may choose not to Park and Ride at all and they may drive to their destination.

Often the issue is not so much whether Park and Ride should be provided but how can we provide a facility when there is usually little land available in an appropriate convenient location. It is crucial that consideration is given to identifying and developing Park and Ride provision before land is sold off or developed for another purpose. Transport Scotland should ensure that as far as possible rail land is retained where it could be utilised for future park & Ride provision.

Parking Charges
As in city and town centres, parking charges at stations should not be considered for generating income but should only be employed to manage demand and encourage modal shift. The imposition of parking charges may appear to offer potential for savings in maintenance costs associated with the rail network, but this must be carefully balanced against the potential benefits that encouraging modal shift offers. These benefits include reductions in car usage, less traffic congestion, fewer accidents, less wear and tear on the road network, an improved environment in city and town centres, fewer delays to freight transport, lower emissions, smaller carbon footprints, reduced consumption of fossil fuels, etc.

Parking controls and charges should be used as a tool for encouraging modal shift and they will not be effective unless an alternative effective, affordable public transport service is available. If parking charges are added at station car parks then car drivers may save these costs, save on their train ticket and drive to their destination even if it means paying a parking charge when they get there. It is not surprising that your study found that two-thirds of passengers who currently drive to the station might not travel by rail at all if parking charges became what they regard as unfair.

Rail (or bus) based Park and Ride should be free to the user or the fee charged should be redeemable against the cost of the fare.

Station parking policy should also take into consideration and be complementary to local parking policy along the route of train services. e.g. charges should not be introduced where they would simply displace parkers onto adjacent roads. While, parking charges might be appropriate at rail stations within parking control areas, it would be wise to refund these parking costs when train tickets are purchased. However, careful consideration will have to be given to parking charge refunds in city centres where parking charges may be particularly high and there could be options for abusing the system by purchasing a cheap train ticket to minimise parking costs.

Following simple demand and supply considerations, the pricing of rail fares already acts as rationing: it manages passenger demand against the supply capacity of rail services. As rail fares already influence rail demand there should be no need for additional parking charges which will penalise rail travellers.
Station choice

Your findings that passengers will drive to stations which aren’t the closest to their home to chase capacity and service frequency is noted. This does not self-regulate the balance of parking and service provision but instead displaces parking issues to popular stations.

Public Transport Integration

Where settlements do not have extensive rail services, bus based Park and Ride should be considered. Because of this, rail can only be part of the solution in Scotland and bus based Park and Rides should be considered further as a realistic alternative.

If there is insufficient car parking at railway stations or consideration is given to parking charges or other parking controls then alternative modes of transport should be encouraged. e.g. interchanges with feeder bus services, cycling and walking.

There is already competition between rail and bus services and the introduction of uncompetitive rail fares or parking charges may deter rail travel and encourage passengers to use bus services.

Park and Ride development and Maintenance Costs

The current regime for working with the rail industry makes it difficult, time consuming to develop and implement Park and Ride proposals. The imposition of high charges by the rail industry when working with partner organisations investing in the rail network needs to be reviewed. These high charges discourage investment in Park and Ride facilities which support and encourage rail use.

Having greatly increased Park and Ride provision in South Lanarkshire we have found that our maintenance costs are significantly lower than the charges imposed by Network Rail. Consideration should be given to reviewing the rail industries maintenance costs and Transport Scotland should absorb these maintenance costs into the overall rail budget.