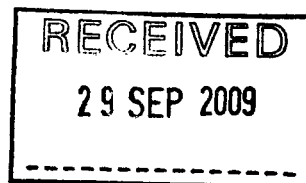


24 September 2009

Mr Lloyd  
Transport Scotland  
Strategic policy and Integration Team  
Strategy and Investment  
Buchanan House  
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Dear Mr Lloyd,

### **Station Car Parking Policy in Scotland – SPT Consultation Response**

SPT welcome the opportunity to respond and support the development of a station car parking policy for Scotland in principle. We do, however, have a number of comments to make and these are included in appendix 1.

As the Regional Transport Partnership for the West of Scotland SPT has a duty to prepare the statutory Regional Transport Strategy (RTS). A strategic priority of the RTS is encouraging modal shift to more sustainable modes. Station based park and ride will be an important tool in delivery of the RTS and achievement of this strategic priority. Furthermore, SPT has recently completed a comprehensive Park and Ride strategy with accompanying action plan.

SPT also has a record of delivery in rail Park and Ride schemes across the West of Scotland in recent years including sites at Easterhouse, Merryton, Patterton and others. We have also been advanced £5 million from the Scottish Government in 2009/10 for further delivery of Park and Ride in the West of Scotland including rail schemes. Indeed we recently completed, in partnership with West Dunbartonshire Council and partners, Dalreoch Park and Ride which created an additional 67 spaces on this key transport corridor.

We would welcome further input to the development of this policy and would be happy to meet with Transport Scotland to discuss our response in further detail.

Yours sincerely

A handwritten signature in black ink, appearing to read "Rodney Mortimer".

**Rodney Mortimer**  
**Director of Policy and Strategy**



## Appendix 1

### 1. Specific Issues for consideration

- Suppressed demand

1.1 Annex A of the consultation document rightly considers the issue of suppressed demand. We agree with the prediction that the demand for rail services is likely to continue to grow into the future. This would naturally suggest that demand for rail station parking is also likely to grow. However, caution should be exercised over assumptions that additional rail station parking will significantly reduce road congestion and emissions. For example it is likely that additional (free) car parking provision at stations could encourage more driving and discourage use of feeder bus services, walking and cycling to some extent.

1.2 It could also be suggested that such an approach would represent the car parking equivalent of 'predict and provide', where additional supply (or spaces) is quickly occupied, potentially creating higher traffic levels and emissions around stations in the longer term. Therefore, SPT would recommend that additional investment in new station parking capacity should be thoroughly appraised, monitored and evaluated against the policy objectives developed. SPT has developed an appraisal methodology which may be helpful here and we would be happy to share our thoughts on this with Transport Scotland.

1.3 An important point to recognise from the outset is that the market for rail station parking is directly influenced by the wider availability of city based PNR sites at workplaces and other 'destination' parking policies (i.e. parking at major retail and commercial areas). While SPT recognise that such factors may be outwith the scope of this policy, it should be recognised that they have an influential impact on the demand for station parking and the viability of future investments at such sites. Also crucially important to the success of any station car parking regime are the parking policies and car park charging regimes in our towns and city centre. Any strategy must take into account the demand dynamics of town and city centre parking regimes which will inevitably impact on the usage of station car parks.

- Station Choice

1.4 In terms of station choice, we would agree that the success / failure of park and ride schemes can depend on service frequency. This is a key variable in car users decision to use particular stations and is evident at SPT's Subway based Park n Ride sites. Generally, we would recommend that future station car parking interventions are focused on stations with high service frequency. In developing the SPT Park and Ride Strategy SPT undertook behavioural analysis surveys and again we would be happy to share our findings with Transport Scotland.

- Overpricing for car parking dissuades people from rail travel

1.5 If the predicted increase in rail patronage is realised car park pricing will become an increasingly important tool in the efficient management of such sites. It should be noted that the vast majority of non city centre sites in the SPT area do not currently charge for parking. We would also agree that additional charges may dissuade some segments of the market from using rail, but this will vary depending on destination and the level of



charges which are applied. However, SPT also realise that charging as a demand management tool could become more prevalent as the increased demand for rail services is realised.

- 1.6 The impact of rail station charging regimes on surrounding areas in terms of on-street parking should also be considered in relation to pricing aspects of the policy. There are problems associated with 'non official' station parking particularly around town centres, retail, commercial and residential areas. It is therefore important that any future policy approach recognises the wider transport network impacts in this context.
- 1.7 Similarly the influence of parking regulation in relation to demand management is also likely to increase as the demand for rail services grows. Often combinations of pricing and regulation regimes will be required and applied. Again, it is important that any future policy approach recognises wider transport network impacts in this context
- 1.8 Overall we consider that further research is likely to be required in order to develop a better understanding on the overall impacts of car park charging and regulatory regimes on rail patronage in the West of Scotland and other areas.

## **2. Further issues for consideration**

- Related policy directives

- 2.1 We note that the 'background and context' section of the consultation document rightly refers to the National Transport Strategy (NTS). This should also include reference to the role of the statutory Regional Transport Strategies (RTS), Local Transport Strategies (LTS), Local Development Plans and Strategic Development Plans in the policy planning process.
- 2.2 Furthermore we believe that the roles and responsibilities of key agents should be outlined in the policy development process. In particular the role of Transport Scotland, Network Rail, Scotrail, RTP's, Local Authorities and the private sector should be defined in terms of station car parking responsibilities.

- Data Availability

- 2.3 SPT's comments are based upon publicly available data sources relating to station car parking. We would welcome the opportunity to view SQUIRE data relating to specific sites in our area should it become available.

- Definition of Station Car Parking

- 2.4 A key starting point for further development of this policy is to develop a common definition of what is meant by 'station car parking'. In practice 'station car parking' includes not only parking at station car parks themselves, but also adjoining roads and adjacent areas. Therefore, SPT believe it is important to define 'station car parking' in this context in order to appropriately limit the scope of the policy, focus the objectives and support efficient outcomes.
- 2.5 Additionally, a number of terms (with differing characteristics) are often used in this context including Park and Ride (P&R), off street parking, on-street parking, private non



residential (PNR) and others. As noted in the consultation document, such car parking is also complicated by the mixed pattern of ownership, operation, charging and regulation applied at each locale. Therefore, SPT would also recommend that the scope of the policy in terms of parking 'type', land ownership, charging and regulatory regimes is clearly set out in the policy development process.

- Objectives of Station Car Parking Policy

2.6 The consultation document suggests that the overarching objective of this policy document will be to encourage or facilitate modal shift from road to rail. Fundamental questions which subsequently follow this objective include;

- Is increased and or improved station car parking provision the most effective and efficient way to encourage modal shift from road to rail?
- To what extent will increased and or improved station car parking provision contribute to reduced road traffic?
- To what extent will increased and or improved station car parking provision contribute to reduced carbon emissions?

2.7 SPT would recommend that the potential impact on modal shift, traffic levels and emissions should be considered in the station car parking policy development process. They should also be explicit in the detailed objectives of the policy in order to set achievable and measurable targets in terms of modal shift, congestion and emissions.

- Making efficient use of existing facilities

2.8 The design and layout of station car parks is crucial to their success. Where space is constrained, as in many of the stations in the West of Scotland, effective design coupled with appropriate pricing and regulatory regimes will be increasingly important in ensuring the most efficient use of existing station car parking facilities. Therefore, SPT would recommend that station car parking design, pricing and regulatory best practice be considered in the policy development process.

2.9 The further development of electric vehicles and infrastructure is likely to represent an opportunity for station car parking in the near future (particularly city centre based sites). We believe that the opportunity to install and raise revenue from charging stations should be further explored as a means of improving the efficient use of existing facilities and encouraging more sustainable modes of travel.

- Supporting active travel and PT Interchanges

2.10 An important issue to consider is the impact of station car parking on active travel and opportunity for public transport interchange. Of particular concern was the impact of additional car parking may have on public realm and the station environment which in some cases may deter people from walking or cycling to the station.

2.11 The design of station car parks often do not effectively support interchange with other modes of public transport including bus and taxi. Similarly, suitable areas for passenger 'pick up and drop off' by private car are often not incorporated in current facilities.

2.12 It is our view that the impact on active travel and transport interchange possibilities must be included in station car parking policy development.





- Ownership and maintenance

2.13 As noted in the consultation document station car parking is characterised by a mixed pattern of ownership. Often at single sites this can result in several bodies being charged with ownership and maintenance of station car parking.

2.14 There is a need for better understanding of the pro's and con's of different ownership and maintenance models and that the policy development process should look to provide a best practice approach for operators. Again, SPT has considered this in developing its P&R Strategy and we would welcome discussions with Transport Scotland on this.

- Interaction with surrounding land uses including retail, residential and commercial areas

2.15 Tensions that often exist from competing land uses surrounding train stations in the west of Scotland. The policy development process should take into consideration the impact of surrounding land uses including retail, residential and commercial. The policy should look to develop best practice with a view to supporting the regional and local economies involved which reflects and supports local, regional and national land use policies.

- Monitoring and Evaluation of Policy effectiveness

2.16 It is crucial that planned interventions to improve station car parking are appropriately monitored and evaluated in line with STAG guidance. To aide this process SPT would recommend that the policy development process seeks to develop clear objectives and performance indicators are established prior to policy implementation.

### **3. Other general comments**

3.1 SPT note with interest your statement in the covering letter; *"The development of a policy on station car parking is not intended to influence these proposals, or any existing plans for new car parking provision being taken forward by Transport Scotland, or by partner organisations"*. We would welcome clarification from Transport Scotland as to how this policy is likely to be applied given this statement.

3.2 SPT would suggest that in the further development of the station car parking policy for Scotland that a guideline criteria for station car parking is developed in order that a consistent, transparent approach is adopted by all relevant agencies.

