

**Draft Policy Paper for Parking
In the Bangalore Metropolitan Region**

Feedback submitted by Hasiru Usiru

<http://www.hasiruusiru.org>

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Overall Comments

We would like to commend the Directorate of Urban Land transport for coming out with a progressive parking policy for Bangalore. We request the DULT to

- 1) Conduct extensive statutory public consultations before the policies are finalised. The consultations need to be open and participatory, allowing all people to contribute.
- 2) Make the draft policy more accessible by various means – translation to Kannada, distribution of physical copies etc
- 3) Involve elected representatives – BBMP will have elections in November and the newly elected representatives of the BBMP should also be involved in the wider public discussions

We would however like to highlight some of the main comments we have on the policy, in this section. The next section contains detailed comments on the policy

We feel that the following **aims** of the policy are progressive and will help Bangalore have a sustainable transport system -

- Reducing the growth in number of vehicles
- Moving away from on-street parking
- Promoting public transport

Main Comments

1. While implementing the policy, it must be ensured that creation of parking infrastructure must be coupled with banning on road parking, else there will be more parking facilities and hence more vehicles.
2. The suggested 6 year timeline for implementation needs to be shortened to 3 years .In 6 years, Bangalore population will have nearly doubled and the recommendations of the policy might not be enough to achieve its aims.
3. In order to ensure that the policy will not fail in implementation, DULT must release a handbook for implementation for all the government agencies involved. Manual must also suggest possible remedies for anticipated road-blocks
4. There must be a public review of the policy in the implementation phase
5. There must be wide public debate on the need for Public Private Partnerships (PPP). If there is public endorsement and clear demonstrable need for PPPs, a regulatory framework for defining the norms and scope of needs to be evolved before new PPP initiatives are begun.
6. Changes in by-laws and other regulations must be done keeping public good in mind and must be done in such a way that there will be no adverse side-effects due to commercialisation
7. Creation of parking infrastructure must not involve the abuse of existing open spaces and natural commons

Detailed Comments

Chapter 1 – Introduction

Key Concerns related to Parking

3. The current planning tools adopted by the city are largely inadequate. The creation of parking and shift to public transport needs to be inbuilt within the statutory and operational planning of projects. This requires a renewed approach to planning.

While the recommendations speak of ways to create parking infrastructure, there is no mention of how 'encouragement' of public transport will be done.

4. Enforcement of parking restrictions

Though the Building by-laws mandate the provision of parking in the basement and adequate number of car parks in the buildings, there has been rampant violation.

The Implementation plan and policy recommendations talk of new by-laws to facilitate implementation of policy but do not address this concern related to implementation of existing by-laws. This needs to be tackled.

Chapter 2 – Principles of Parking Policy

Strategic Intent

Reduction of congestion especially at junctions, vantage points and nodes, to avoid the diversion of open (Public) utilitarian spaces for parking and eventually

This point needs to be clarified. How will reducing congestion at junctions help avoid diversion of public spaces for parking?

Regulating the growth of vehicle numbers (by framing appropriate rules).

This is a laudatory move and is backed by recommendations and suggestions later in the policy. The policy also needs to mention a mechanism for monitoring the same.

5. To promote private participation including private initiatives and project implementation
Earlier in the policy (in the Parking Issues overview section), it is mentioned that

“PPP initiatives not fully effective: Under the PPP initiative, the development of commercial use was allowed as a concession for improving the viability of the project. Though a novel concept, it has resulted in generation of traffic and private vehicles by the commercial space. This has not served well for meeting the demand for parking”

This contradiction needs to be clarified. Is it that Public-Private Partnerships (PPP) initiatives as a whole do not work well or is it that certain types of PPP implementations do not work well. The policy calls for PPP implementations in a number of places. The need for PPP initiatives needs to be

discussed publicly. If it is decided to have PPP initiatives, a clear framework which clearly mentions the norms and scope of participation of private agencies needs to be detailed out.

Planning and Design

P&D 01:

a) The zoning of land use such as commercial business areas , Mixed land use developments , high intensity land uses are to be centred around the transportation hubs with adequate parking.

Some of the transportation hubs occur in land which is ear-marked as residential- for e.g., the southern reach of the Metro. In this , changing land use might have a adverse impact on the residential area. This needs to be kept in mind.

b)The Land use documents prepared by BDA primarily depend on the management of the Floor Area Ratio. Transportation hubs such as Metro stations, railway stations, transit centres must be accorded with higher FAR within specified guidelines.

How this will alleviate the situation needs to be spelt out.

d)Projects taken up by BBMP or any other agency (private or public) that induces a large vehicular traffic needs to include transportation needs(To make reservations of space for parking, commuter facilities, etc).

e)Periodic reviews of plans and projects are required to ensure proper compliance of parking norms is met.

How will these be ensured?

P&D 02

Care must be exercised that these structures do not despoil the character of the neighbourhoods or protect green cover. Also, in encouraging private players to participate in developing parking structures: Caution must be exercised here - for a profit motive, private players may end up developing parking structures in very inappropriate locations, that might increase rather than reduce traffic congestion. The process of deciding on a parking location must include a clear understanding of the impact of a parking structure on local traffic flows.

P&D 03

(b) The approvals for such projects should be carried out through a consultative approach. It should be explicitly stated that the consultations should be statutory

(c) High intensity land uses shall provide mandatory accommodation for additional parking facilities either at the basements, multi level or through sharing of facilities (both Govt. and Private).

(d) In case of non provision, the developers/ owners of the said facilities shall pay an impact fee to BBMP.

There is a provision that high intensity land users w/o parking facilities can circumvent the responsibility by paying an "impact fee" to the BBMP. This effectively acts as a loophole. Parking should be made mandatory without exceptions. Also, in addition to high-intensity land uses this must apply to commercial establishments (which attract customers to their premises) must also be covered

P&D 04

(a) Many of the Building renewal projects cannot accommodate parking in their plans due to the constraints of space within the site. In such cases, equivalent parking impact fee based on the intensity of the use shall be levied and authorities will facilitate common parking infrastructure. Clear guidelines must be established for which old buildings are allowed without providing for parking lots.

c) In case of old city areas – disused government facilities such as civic amenities may be used for parking.

Civic amenities should not be used for parking. Civic amenities are already under threat from various other ends, they should not be diverted for parking.

P&D 05

(a) The Area level planning shall be carried out to provide for common parking, creation of pedestrian zones and mitigate the effects of indiscriminate parking.

This is a good move. For this to have an effect though (in terms of discouraging using vehicles and parking them in residential areas) will parking be banned in the roads of the mixed use area? If parking is not banned in the roads, users may avoid using the common parking areas and still park on the roads. Also, we need to be careful that commercial areas that are well served by public transport do NOT develop parking infrastructure. That will defeat the purpose.

P&D 06

Introduce planning tools to effectively respond to area level requirements.

(a) The current practice of preparing the Master plan is to serve at the City level. As the scale is very large and restricted to land use zoning plan, it cannot fully guide and serve the “area level requirements”. It is necessary to introduce an intermediate level of planning and this could serve for redevelopment purpose as well.

Policy should also suggest the scope of the area level planning that will be appropriate.

P&D 08

(b) In case of large developments, where standards and norms are only a pre-requisite, the provision and management will need to be carried out in consensus /negotiation manner with project promoters.

This might allow the developers to get away without providing for the requisite parking facilities. Provision of adequate parking facilities within the premises of the developed property must be made mandatory. Separate norms and standards for residential property development and commercial property development must be prepared.

P&D 011

Bicycles parking lot

(a) Bicycle parking should be mandatory in all facilities

(b) Atleast 15 % of the two vehicular parking space reserved in all building plans should be reserved for the bicycles.

This is an appreciable move. Along with the space reserved for bicycle parking, parking infrastructure like stands to dock/lock the cycles must be provided mandatorily.

2. Transportation

Trans/04

Identification of the zones in the city to be carried out to meet transportation demand, supply and parking infrastructure in a scientific manner.

(a) Based on the land uses, intensity and socio-economic conditions, zones in the city will be delineated. The demand zone wise shall be assessed for estimating the parking demand and detailed plan for implementation drawn involving public & private participation.

The appreciable move to involve public participation should be extended to the identification and assessment phases and not just restricted to implementation.

(b) Suitable Large public spaces such as Parks, Race Course, Playgrounds, stadium and underutilised public amenities and land at select localities can be utilised for off-street parking through use of basements, under ground parking structures. Care must be taken not to disturb the functioning of the space above.

Utilizing open spaces even for basement parking should not be allowed. This has immense potential to cause damage to open spaces.

Trans/06

Differential treatment of identified zones in the city: (a) Identified zones in city require differential treatment while according sanction, approvals, taxation, Transfer of Development rights. The detailing for the same will be carried out after studies and consultation.

These consultations need to be statutory and public

Trans/08

The measures suggested in Trans/08 are much needed and need to be implemented on an urgent basis. However this point needs more discussions -

b) Phasing out old vehicles which are more than 15 year old and non compliance to pollution norms.

5. Governance and institutional

Gov/02

Private sector participation is to be encouraged and this should be regulated. Individual plot owners must be allowed to develop parking for 2, 3 and four wheelers subject to conditions.

Gov/03

Clarity on PPP projects for creating facilities is required for overcoming difficulties while according sanctions and clearances.

As mentioned earlier, DULT must put in place a overall regulatory framework that will guide PPPs in parking.

Chapter 3 – Recommendations-phase-1

Parking in Residential Areas

By providing additional FAR steps will be taken to create more parking spaces in residential areas. Additional FAR must be allowed only for creating parking spaces, else this might be misused to commercially develop properties and spoil the residential nature of the locality

Parking in Public Institutions, Cinema Theatres, etc

- Institutions (e.g. educational institutions), industrial establishments, commercial complexes, cinema theatres, kalyana mandapams, entertainment halls, hotels and restaurants will provide adequate off- street parking facilities for employees, visitors etc. Spill over of parking arising from these establishments to the streets will be discouraged / prevented.*

Provision of off-street parking must be made mandatory. Spill-over of parking must not be merely discouraged but must be dis-allowed.

Chapter-4: Roles and responsibilities of stakeholders

Directorate of Urban Land Transport / Government of Karnataka

Will organise training and sensitisation programmes

This must be held for both government agencies and general public. In addition to the roles and responsibilities mentioned, DULT must also ensure that statutory public consultations are held at all stages.

BBMP

Will undertake measures for allowing incentives such rebate in municipal tax, waiver and issue of Transfer of Development right

TDR must be allowed only for creating parking infrastructure and not for other commercial purposes.

Transport Department

The transport department should also be responsible for ensuring the following two measures suggested in Trans/08 -

- a) *Limiting the upper cap of vehicles that can ply in the city.*
- b) *Phasing out old vehicles which are more than 15 year old and non compliance to pollution norms.*

Chapter 5: Timelines of Implementation

The timeline for this policy speaks of a 2 phase 6 year plan. Given the magnitude of the vehicle population problem faced by Bangalore, having a 6 year time-plan will not serve in achieving the goals of this policy. In 6 years, Bangalore's vehicle population will be close to double the present population and implementing this policy will not only be herculean, but might not yield the desired results.

The policy should ideally look at a 3 year time-frame with various aspects going on in parallel. Each phase should be of only 18 months duration

First Phase (Months 1- 18)

Sl. No	Item	Owner
1	Organise training and sensitisation programmes.	DULT
2	Initiate drafts of policies/documents which ensure that adequate planning norms and guidelines are built into the statutory documents for parking according to the needs of the township requirements	BMRDA
3	Will carry out necessary studies for detailing and arriving at a consistent framework for various areas- this will include area level planning and development proposals.	BBMP
4	Will set up the Special Purpose vehicle for funding, monitoring and enforcement of parking policy	BBMP
5	Issue and Implement new parking pricing policy with immediate effect	BBMP
6	Initiate revision of the bye laws to incorporate the policy recommendations	BBMP
7	Identify all roads where on-street parking will be banned and initiate pilot in select roads	BBMP, Bangalore Traffic Police
8	Enforce the parking regulations and rules by levying penalties, etc.	Bangalore Traffic Police
9	Incorporation and adaptation of policy recommendations in the zonal regulations.	BDA

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8	Involve in training and educational programmes for road users	Bangalore Traffic Police
9	The TTMC and Multi-modal hubs should encourage park and ride facility.	BMTC
10	Develop mechanism for issue of parking certificates on registration by collection of stipulated fee.	Transport Department
11	Initiate public discussions on phasing out old vehicles	Transport Department
12	Propose measures for restricting new vehicles	Transport Department, DULT, BBMP

Second Phase (Months 19- 36)

Sl. No	Item	Owner
1	Review implementation of policy by all stakeholders	DULT
2	Ensure that ally statutory documents have adequate planning norms and guidelines for parking	BMRDA
3	Complete area level planning for parking purposes	BBMP
4	Finalise by-laws which incorporate parking policy recommendations	BBMP
5	Create parking infrastructure by construction of new parking lots as well as undertaking measures for allowing incentives such rebate in municipal tax, waiver and issue of Transfer of Development right	BBMP
6	Implement ban on on-street parking in selected roads	BBMP, Bangalore Traffic Police
7	Incorporation and adaptation of policy recommendations in the zonal regulations.	BDA
8	Continue training and educational programmes for road users such as BMTC, auto rickshaws	Bangalore Traffic Police
9	Issue parking certificates on registration of new vehicles	Transport Department
10	Phase out old vehicles	Transport Department
11	Implement measures to reduce new vehicle registration	Transport Department

The following measures should also be adopted during the implementation phase -

- 1) Arrive at a set of indicators to help track progress during implementation
- 2) Have a annual public review of the policy and its progress

Annexures

Annexure 1 - Proposed parking fees in Business areas

It is mentioned that the parking fee will arrive out of a detailed study and public consultations. This step is very much required. In addition, the basis on which the pricing structure is based should also be re-iterated during the process and should be clearly spelt-out. Some suggested criterion could be

- 1)The amount of land occupied
- 2)Whether the price decided upon should act as a deterrent
- 3)A combination of 1 and 2

As far as the sample price structure mentioned is concerned, although these rates are indicative only, the price-structure needs to be commented upon.

Parking fees for cars is too low. Based on this structure, for a 2-wheeler, the first hour costs 15.00 Rs., for a car it costs 25.00 Rs. A car occupies the space meant for atleast three 2-wheelers, and it should be charged a minimum of 45.00 Rs for the first 1 hour.

Fees for the subsequent hours should also be higher than just 10.00Rs or 5.00 Rs.

Under this model, a car parked on M.G.Road for 8 hours will just have to pay 80.00 Rs! If you look at the amount of real-estate occupied, the amount is very low. Parking fees should be made high enough to serve as a disincentive.

Importantly, the guidelines should also explicitly state that the bicycle parking will not be charged any money.

Annexure 2 - Roads identified by BBMP for street side parking

This annexure is not very clear. It mentions that the list of roads are those identified for street-side parking. Does this mean on-street parking will be allowed only in these roads and not others? The criterion and process for selecting these roads for street-side parking must also be mentioned.

Annexure 3 -Proposed Multi level Parking Plazas

As already mentioned earlier in the policy, these multilevel parking plazas are wholly inadequate to accommodate parking from the roads where on-street parking will be banned. In addition, the parking structure should be arrived at not only by the private operator but the private operator in consultation with the BBMP. Parking infrastructure is public infrastructure and public good needs to be kept in mind when deciding the fare structure. A regulatory framework for setting the scope and guidelines for private participation must be arrived at before private participation is allowed.