

SUPPLEMENTARY PLANNING DOCUMENT SPD14: PARKING STANDARDS

CONSULTATION STATEMENT

Introduction

This statement has been prepared by Brighton & Hove City Council under regulation 12 of the Town and Country Planning (Local Planning) (England) 2012 Regulations. It sets out the details of whom the Council consulted with following the development of the draft revised Parking Standards Supplementary Planning Document (SPD), a summary of the issues raised and how the issues have been addressed in the final SPD. The consultation was conducted in line with Brighton & Hove City Council's Statement of Community Involvement (SCI).

The current Parking Standards Supplementary Planning Guidance (SPG) 04 were first approved in 1997 and incorporated into the first draft Local Plan in September 2000. The SPG sets out the Council's off-street parking standards and provides guidance on the levels of parking that should be provided in new developments. It is the intention that the Draft Parking Standards SPD will replace the existing standards contained in SPG04 when formally adopted.

The following groups and individuals have been contacted by the city council for their views on the draft SPD:

- The Public
- Elected Members
- Local community groups
- Developers and land owners
- Planning consultants and architects
- Bus companies
- Highways England
- Housing Associations
- Natural England
- Environment Agency
- Transport Partnership
- Other Local Authorities within the region

The consultation was freely available to all on the Council's website

How these persons were consulted

The SPD underwent initial issues and options consultation with stakeholders between 17/03/2014 and 14/04/2014, prior to formal drafting commencing. The consultation was open to all, with views sought of stakeholders including

developers, architects and planning agents, Councillors, local interested groups, parties and companies. Development Control officers, Planning Policy officers and other relevant transport teams were also consulted at a later stage prior to the completion of the draft document. Internal teams were consulted via email and at meetings throughout September, October and November 2014.

The resultant draft SPD was subject to a 6 week formal public consultation between 13th February 2015 and 27th March 2015. The consultations included an advertisement in the local paper (The Leader 19th February 2015) and on the Council's website, emails sent to numerous stakeholders and interested parties, hard copies sent to the main libraries and council City Direct offices; elected Members were consulted by email.

This consultation statement provides a summary of the main issues raised by those consulted in February/March 2015 and how the issues raised have been addressed in the final version of the SPD, pursuant to Regulation 12 (a) ii and iii of the Town and Country Planning (Local Planning) (England) 2012 Regulations.

Summary of the main issues raised during consultation

A total of 25 individual representations were received during the consultation period from various different bodies and individuals.

Most responses raised few issues with the content of the document beyond small changes and tweaks to various aspects of the document. Numerous respondents were supportive of the content of the draft SPD. Specific positive references were made in relation to the proposed zoning of the city into three different zones, the standards in relation to disabled parking only for certain land uses within central areas, acknowledging that the city benefits from varying degrees of access to public transport and the wording of the supporting text that the standards would be applied on a case by case basis, taking the standards into account for guidance purposes.

Of the objections raised the majority of issues were focussed upon the impact restricting car parking levels in new developments would have on on-street parking availability and the perceived impact that new developments have had in recent years on the availability of parking in certain areas of the city. Other objections were generic objections to all council parking proposals without providing further justification or evidence for such a position.

The main issues raised from the public consultation which were relevant to the SPD are summarised in the following table and are broken down into main topics:

Topic Raised	Brighton & Hove City Council Response
Zonal Boundaries/Mapping	
<p>It was not evident as to the exact extent of the geographical coverage of the SPD. It could be interpreted that the SPD applied to developments within the South Downs National Park (SDNP) for which the national park authority is Local Planning Authority.</p>	<p>SPD amended to explicitly exclude areas of the SDNP.</p>
<p>Whilst supporting the principle of a zonal approach to the parking standards concern was raised in relation to zoning of some parts of the city. Concern was raised that areas along key public transport corridors, as defined by the mapping, have varying degrees of access to public transport eg Dyke Road Avenue and Old Shoreham Road compared to other corridors.</p>	<p>Amendments made to the zones on the mapping document.</p>
<p>Welcome the inclusion of the Shoreham Harbour Regeneration Area (DA8) within the Key Public Transport Corridor area and suggest that this is extended to include all of Boundary Road/Station Road and Portslade station.</p>	<p>Amendments made to the zones on the mapping document to include the area around Portslade station in the key public transport corridors zone.</p>
<p>The key public transport corridors are illogical. They do not appear to relate to any accessibility assessment. Various changes are required to better reflect public transport provision.</p>	<p>Public Transport accessibility modelling using Visography TRACC software has been undertaken as one aspect to inform the zonal boundaries. Visography TRACC has been used to map the differing levels of public transport accessibility by journey time across the city.</p> <p>Public transport is one of several aspects used to inform where the boundaries should be. However, some changes to the mapping and zonal boundaries.</p>
<p>The shading of the outer area on the zonal map appears to have been drawn outside of the boundary of the Brighton & Hove and into neighbouring districts.</p>	<p>Comments noted, SPD mapping amended.</p>
<p>Object to the sub-division of the West Hove neighbourhood into two different zones where different parking standards would apply.</p>	<p>Comments noted zone boundary amended to run along existing line of Controlled Parking Zone (CPZ) boundary.</p>
<p>The inclusion of Aldrington Basin in the Public Transport Corridor zone</p>	<p>As stated within the standards the potential for overspill car parking from new</p>

results in a lowering of the parking standard from existing levels which could lead to overspill car parking taking place into neighbouring residential streets.	developments will be assessed on a case by case basis and where there is considered to be significant overspill car parking as a result of the development and a reason for refusal is defensible the Highway Authority can recommend refusal of a planning application.
Classifying the roads and streets south of New Church Road differently to those to the North is unjustifiable.	Zoning amended on the mapping.
Car Parking	
For residents in the outer area, private transport is a necessity, not a luxury. The typical family home needs parking for at least two vehicles, plus parking for visitors. Extra flexibility should be allowed to allow higher car parking levels than the standards.	<p>The maximum parking standard for all residential properties in outer areas is 1 space per dwelling plus 1 space per 2 dwellings for visitors (ie 2 parking spaces per property). This standard is considered to give developers adequate flexibility to provide appropriate levels of parking for new residential properties.</p> <p>2011 Brighton & Hove Census data also states that only 3.5% of the households in Brighton & Hove have 3 or more cars and that average cars per household in the outer wards range from 0.86 to 1.45.</p>
The standards could allow an increase in car parking over time in the central area.	The general approach to the development of the parking standards has been to adopt a more restrictive standard within central areas of the city whilst working within the legislative framework set out within the National Planning Policy Framework.
Electric charging should be mandatory for large developments which attract large amounts of parking including supermarkets.	SPD amended so that major retail land use should also provide electric vehicle charging.
Under provision of car parking will inevitably lead to overspill parking in adjacent areas and be to the detriment of existing residents.	<p>The Highway Authority has acknowledged the issue of overspill parking within the supporting text. The supporting guidance states, <i>“The Council recognises that lower parking thresholds than the maximum parking standard will be acceptable in cases where this would not lead to significant levels of overspill car parking which can be detrimental to highway safety and parking amenity of existing residents.”</i></p> <p>Should a development provide a level of parking which does lead to a significant level of overspill car parking the Highway Authority may choose to object to the planning application.</p>

<p>Do not agree with the use of maximum parking standards and feel that the standards should be set as minimum standards. The use of maximum standards is considered to have resulted in an increase in on-street parking which in turn has caused congested roads and therefore more dangerous for all road users.</p>	<p>Comments noted.</p> <p>Parking availability has a major influence on choice of mode of travel used for that trip; especially for non-residential destination land uses. Providing additional (or excessive) parking would be likely to result in unnecessary encouragement of car use, with the negative effects associated with this, such as increasing congestion and impacting upon air quality. It is also important that a balance is struck between the need for parking with the need for efficient use of land; especially given the limited land to develop on in Brighton & Hove.</p> <p>It is therefore considered essential that maximum car parking standards are adopted as part of a package of measures to manage the existing road network in the best possible way.</p>
<p>All roads on critical bus corridors including Castle Square/North Street/southern part of Dyke Road/Western Road/Queens Road/St James Street/Lewes Road should be considered for car free development.</p>	<p>Comments noted. The SPD sets out the criteria to be used when assessing whether a development should be car free. It is important to note that a development can only be made car free in a Controlled Parking Zone (CPZ).</p>
<p>The Council should insist that every new development has at least 1 car parking space per flat.</p>	<p>The proposed residential parking standards are considered to allow flexibility to provide an appropriate level of car parking but also provide a level of parking that takes account of the scale, nature, location and intended end users of the proposed development.</p> <p>It is important to note that some developers especially in more central locations choose not to provide car parking or reduce the level of car parking to maximise the building floor space.</p>
<p>The draft SPD is not considered to have been written in accordance with guidance in the National Planning Policy Framework (NPPF) and needs to be fundamentally reviewed to demonstrate there is compelling justification to impose local parking standards and reference to maximum car parking standards should be removed.</p>	<p>In relation to setting parking standards the NPPF states: <i>“If setting local parking standards for residential and non-residential development, local planning authorities should take into account:</i></p> <ul style="list-style-type: none"> ● <i>the accessibility of the development;</i> ● <i>the type, mix and use of development;</i> ● <i>the availability of and opportunities for public transport;</i>

	<ul style="list-style-type: none"> ● <i>local car ownership levels; and</i> ● <i>an overall need to reduce the use of high-emission vehicles.”</i> <p>Paragraph 39 of the NPPF goes on to include; <i>“Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network.”</i></p> <p>The justification for the actual standard to be imposed will be made at the point of determining the application when the local circumstances pertaining to that application can be assessed on a case by case basis. Parking standards shall only be imposed where there is a clear and compelling justification that it is necessary in order to manage the local road network. Therefore the Parking Standards SPD is considered to have been written in accordance with guidance in the NPPF.</p>
<p>Any new development in central parts of the city should be car free as far as possible with mobility over and above public transport facilitated by car clubs.</p>	<p>The Parking Standards SPD clearly sets out the criteria to be used when assessing whether a development is to be car free or not and these criteria shall be used when determining applications.</p> <p>The Council is committed to the promotion and facilitation of car clubs within the city and through the planning process secures car club bays and vehicles and free membership to car clubs through Residential Travel Information packs; this shall continue.</p>
<p>Not convinced about the arguments for central car parking for C1 (Hotels) uses, but accept those for C2 uses (Residential Institutions). For C3 (Residential) and C4(Homes in Multiple Occupation) land uses there should be no provision for car parking in the central area.</p>	<p>The standards have been developed in a way to ensure the appropriate level of car parking is provided taking into account the scale, nature, location and end users of the proposed development. Whilst also ensuring that the viability of developments is not adversely affected.</p> <p>These standards provide a guide as to the maximum appropriate level of car parking to be provided. However, assessment of each application will be on a case by case basis taking into account the standards for</p>

	guidance purposes.
Perhaps the point should be made that car free housing offers the advantage of higher densities and better environment for workers and residents alike.	Additional text has been included in the supporting text, highlighting the benefits.
Additional parking will be required for A1 (retail) and C3 (residential) land uses to deliver viable development.	Comments on the standards noted. Parking availability at the destination of a trip has a strong influence on the choice of mode for that trip; hence the need for maximum parking standards. The Parking Standards are for guidance purposes and assessment of each application will be on a case by case basis.
Agreement with the principle of the zoning, but wonder whether new development in the central zone should not be car free in principle, it is acknowledge that this is more or less the intention of the draft standards.	<p>The overriding principle of the standards is that a more restrictive approach to parking will take place in central areas of the city where there is less land available for additional parking but also this area benefits from the greatest public transport accessibility and the availability of most off-street car parking opportunities.</p> <p>The criteria for assessing developments against the need to be car free or not are clearly set out within the standards and it shall be these criteria that will be used when assessing each application on its merits.</p>
More an explicit reference should be made that developments on the boundary of the Brighton & Hove administrative area need to take account of the potential for overspill car parking that may take place in neighbouring authorities.	Comments noted the supporting text has been amended.
The SPD needs to provide additional clarity on the contribution that garages can make towards car parking provision (and their design requirements).	Standards practice is to include garages as a parking space. In relation to the design requirements, this SPD is purely focussed on the number of parking spaces and a design guide on parking will be produced at a later date.
Land Use Classifications	
Consideration could be given to expanding the D2 land uses to include Sui Generis Theatres.	Theatres are classified as sui generis land uses in the Town and Country Planning (Use Classes) Order 1987; therefore it would not match the classifications to include it under a D2 land use. It is common practice to base the parking standards against the most relevant land use and therefore should a theatre be assessed against the standards it

	would be against similar land uses such as cinemas and music halls.
Disabled Car Parking	
Agree with providing for disabled users only for the land use categories A1 – A5, B1 and B2 uses.	Comments noted.
Cycle Parking	
There is no detail in the SPD on the type, security, layout or access arrangements for cycle parking.	As stated in the SPD supporting text the purpose of the document is to provide guidance on the appropriate number of parking spaces. It is intended that an additional guidance document will be produced at a later date that provides full guidance on the design and layout of parking.
The SPD should contain an overarching statement of cycle parking policy requiring developments to provide secure, integrated, convenient and accessible cycle parking.	The purpose of the SPD is to expand on existing policy and not to create new policy. There is an adequate policy basis within the retained policies in the Local Plan and the City Plan to secure high quality, secure, convenient and accessible cycle parking facilities.
The following changes to cycle parking provision should be made: A1 Food retail – 1 space plus 1 space per 100m ² A2 needs short stay parking A3-A5 should be the same standard as per A1 (non-food retail) B1 Industry needs short stay parking C1 Hotels need short stay parking C3 1-2 bed residential 1 space per bedroom	Comments noted amendments made where necessary.
Insufficient cycle parking provision within the standards for A1, A2, B1, B2 and D2 land uses.	The proposed standards have been compared against the standards used within other comparator locations across the country and the proposed standards are considered to provide an appropriate level of cycle parking to reflect the recent increases in cycle use across Brighton & Hove. However, on further assessment of other Local Authority standards changes were made to increase the A1 (retail) customer and the B1 office visitor cycle parking standard.
Houses of Multiple Occupation (HMO) should also require short stay cycle parking.	The majority of HMO applications received are for conversions of single residential properties where there is limited space to

	accommodate policy compliant visitor and resident cycle parking. Visitors could use on-street cycle parking where available or resident cycle parking within the property.
Miscellaneous	
A3 (Restaurant & Cafes), C2 (Hospitals), D2 (Concert halls) no provision of taxi drop off.	<p>Given the availability of land within the city and the high building densities, especially in central areas it can be extremely hard to provide land intensive dedicated pick up and drop facilities.</p> <p>Also, there are numerous locations across the city including double yellow lines where taxis can legally pick up and set down passengers. Generally this negates the need for a dedicated taxi pick up/drop off provision.</p> <p>Obviously developers are free to provide these where they can be safely accommodated into a new development.</p>
Should there be a reference for parking facilities for car club vehicles.	Reference is now included to car club vehicles and when they should be provided.

How these main issues have been addressed in the SPD

Many of the above issues have been positively incorporated into the draft SPD. Some of the issues raised during the consultation fell outside the remit of an SPD and therefore not all the recommendations within the responses can be incorporated into the document. While other issues raised would have significantly reduced the effectiveness of SPD.

Several comments raised issues surrounding land uses and types of parking that should be included within the parking standards. The majority of these have been incorporated within the draft SPD or reference will be made to them in supporting design guide; which shall be produced at a later date.

A regular theme within the consultation responses was the perceived restrictiveness of the guidance in terms of reducing the number of car parking spaces in new developments, especially residential developments. To clarify, the purpose of the document is to set out guidance to assist applicants, members of the public and decision makers in the design and assessment of proposals. The overall approach within the standards reflects local circumstances and seeks to strike the right balance between providing appropriate levels of car parking spaces while also promoting sustainable forms of transport in areas of good accessibility by sustainable modes. The Council has also stated within the SPD that the provision of adequate parking facilities and their design should be appropriate to the scale, nature, location and users of the proposed development. This is to ensure that significant levels of overspill car parking do not occur as a result of new development.

Other issues raised from the consultation have not been specifically addressed as they fall outside the remit of the SPD. These included issues associated with the need to undertake Equalities Impact Assessment's on other Council projects/areas of work, the loss of historic street scenes and private green spaces, the need for a Park & Ride facility in the city, the charging of parking, the potential for free car parking, the availability and prices of taxis, the need for a congestion charge, comments on specific developments that have already been built out and the extent of CPZs. For clarity the SPD does not propose to make any changes to CPZs or the charging structure of on-street or Council owned car parks.

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