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**BY EMAIL** ([planningpolicy@warwickdc.gov.uk](mailto:planningpolicy@warwickdc.gov.uk))

28967/A3/EP/BT/ac

8<sup>th</sup> May 2018

Dear Sir/Madam,

**WARWICK DISTRICT COUNCIL DRAFT PARKING STANDARDS SPD CONSULTATION RESPONSE.**

We are instructed by our Client, St Joseph Homes Limited, to submit a response to the Warwick District Council Draft Parking Standards SPD consultation and we welcome the opportunity to inform the production of this document. Our comments are set out below.

**Background**

**National Planning Guidance and the Creation of a Supplementary Planning Document**

The National Planning Policy Framework (NPPF) was introduced in 2012 as a way to reduce the amount of national policy and guidance available. The Planning Practice Guidance (PPG) was first published in March 2014 to supplement the guidance contained within the NPPF.

Paragraph 39 of the NPPF specifically concerns the setting of parking standards and 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*
- *an overall need to reduce the use of high-emission vehicles."*

Paragraph 153 relates to the creation of supplementary planning documents and states that these should only be used where clearly justified (our emphasis). Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery and should not be used to add unnecessarily to the financial burdens on development. The PPG states that they should build upon and provide more detailed advice or guidance on the policies in the Local Plan.



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The Written Ministerial Statement of March 2015 stated that "local 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". (our emphasis)

A draft revision to the NPPF has been released and is out for consultation until the 10<sup>th</sup> May 2018. At Paragraph 106 this repeats the wording within Paragraph 39 of the current NPPF. In addition, it adds, at Paragraph 107, 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. 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.

### Local Plan

National policy states that a supplementary planning document should build upon and provide more detailed advice or guidance on the policies in the Local Plan. It is assumed that the local planning authority is seeking to build upon the guidance set out in Policy TR3 (Parking) within the draft SPD which states:

*Development will only be permitted that makes provision for parking which:-*

- a) has regard to the location and accessibility of the site by means other than the private car;*
- b) does not result in on-street car parking detrimental to highway safety;*
- c) takes account of the parking needs of disabled car users, motorcyclists and cyclists; and*
- d) takes account of the requirements of commercial vehicles.*

*Development will be expected to comply with the parking standards set out in the most recent Parking Supplementary Planning Document.*

The sub text relating to Policy TR3 (Parking) states that parking provision is essential to development, but it is important to strike the right balance. In order to encourage greater use of public transport, walking and cycling as a means of transport, excessive levels of car parking will be resisted on new development. The explanatory text also states:

*"Levels of parking provision for new development should recognise the accessibility and mobility needs of people and businesses and should reflect differences between town centre, edge of urban and rural areas. The objective of this policy will be to seek to balance these competing aims."*  
(our emphasis)

Applicants are expected to provide parking for disabled car users, motorcyclists and cyclists in accordance with the standards set out in the SPD.

### Parking Standards SPD 2007

The Parking Standards SPD was adopted on 16<sup>th</sup> November 2007 to supplement Policy DP8 (Parking) in the Warwick District Local Plan 1996-2011. This SPD will be superseded upon adoption of the new Parking Standards SPD.

For residential development, the standards set out the maximum number of spaces the applicant should provide unless a lower number could be justified against a list of criteria. An additional allowance was made in 'rural areas' to reflect a higher level of car ownership. This allowance was made against two bedroom properties. What constitutes 'rural areas' was not defined within the SPD. The parking standards are contained in **Appendix 1**.

A high and low accessibility zone approach was utilised for non-residential development within the Parking Standards SPD, but this was not reflected in the residential standards. The SPD does not set out why the high and low accessibility zone approach was not applied to residential uses.

The SPD also sets out standards for cycle parking and provides scope for cycles to be held within garages and/or rear gardens. The cycle parking standards are contained at **Appendix 2**.

#### Draft Parking Standards SPD 2018

The draft Parking Standards SPD states that it supplements Policy TR4 (Safeguarding for Transport Infrastructure). It is assumed that this is a typo as this policy refers to the safeguarding of land for transport infrastructure. Policy TR3 (Parking), however, does relate to parking levels within development in the District.

For residential development, the draft SPD sets out what we assume to be minimum parking standards, incorporating a mix of both allocated and unallocated parking. It also sets out cycle parking standards which are enclosed at **Appendix 3**. However, we consider the SPD should be explicit in whether these are minimum standards as this represents a change in approach to the current SPD.

The draft SPD outlines the standards for vehicle and cycle parking within the District to be provided for all types of development as well as guidance and design principles for how parking could be accommodated within schemes. It also sets out guidance on undertaking parking surveys and a unilateral undertaking template reducing/waiving rights to parking permits.

### **Key Points**

#### Comparative Analysis

The draft SPD has amended the standards for both car and cycle parking. The table below sets out the difference in standards for residential schemes. It is set out to take into account the requirement for 20% additional unallocated parking for schemes of 10 or more dwellings (and all flatted development).

#### *Difference in standards*

Dwellings	2007 Standards (maximum)	Draft Standards
<b>Car parking</b>		
1 bedroom	1 space	1.2 spaces
2 bedrooms	1.5 spaces (2 spaces within rural areas)	2.4 spaces
3 bedrooms	2 spaces	2.4 spaces
4+ bedrooms	2 spaces	3.6 spaces
<b>Cycle parking</b>		
1 bedroom	1 space per unit/to be considered on merit	1 space
2 bedrooms	1 space per unit/to be considered on merit	2 spaces
3 bedrooms	1 space per unit/to be considered on merit	3 spaces
4+ bedrooms	1 space per unit/to be considered on merit	1 space per bedroom

As an example, a scheme of 100 dwellings (33 x one bedroom, 33 x two bedroom and 34 x three bedroom) would require 150.5 parking spaces and 100 cycle spaces under the 2007 SPD and 200.4 parking spaces and 201 cycle spaces under the draft SPD. The draft Standards do not make clear

whether the parking provision should be rounded up or down to the nearest whole number, this should be explicit.

#### Level of Parking Provision Required

The draft parking standards, in certain circumstances, would significantly increase the level of parking required within developments when viewed against the adopted standards. In the example set out above, the parking standards requirement increases from 150.5 spaces to 200.4 spaces (33.2% increase). The requirement will increase further as the size of the development increases. The justification for such an increase is a general increase in car ownership between the 2001 and 2011 censuses which doesn't adequately take into account the spatial variation, the potential change in population and any habitual changes which may have arisen. It fails to fully address the first three bullet points in Paragraph 39 of the NPPF. The evidence paper is lacking in detail relating to where and how people use cars and why there is a need for such a level of unallocated spaces within major and flatted developments.

The potential significant increase in the parking requirement could have an adverse impact on high-quality design and viability given the amount of space which will have to be given over to parking in any new developments and potentially expensive engineered solutions (i.e. undercroft/basements). Therefore, the issue of parking requirement needs to be less prescriptive and more flexible to allow for local circumstances; the allowances for failing to meet with the standards set out in Section 2.4 do not sufficiently allow for site-specific considerations to be taken into account. A parking survey is not a mechanism which will show, in every situation, that a suggested provision is acceptable, but the draft SPD appears to use parking surveys as the only tool to allow for reduced parking provision in a development.

The draft SPD is also silent on how it would be possible to provide such levels of parking within a constrained site. The design guidance suggests various ways of providing parking but does not provide advice relating to how they have arrived at these standards irrespective of public transport provision or the sustainability of the location.

#### Lack of Sustainable Balancing

The draft SPD also fails to consider the spatial variations of developments, the impact this would have on living patterns and the impact this would have on requirement; something required by the NPPF. The standards are to be applied throughout the district which does not take into account the highly sustainable locations which are served by public transport and amenities obviating the need for private cars (in some circumstances). The draft SPD should make the distinction between the sustainable urban areas available within the District and allow for a reduced standard to reflect this. National policy is clear that the planning system should encourage sustainable forms of living and an increase in density in sustainable areas. Overly prescriptive, inflexible parking standards have the potential to stifle these developments. Policy TR3 also makes specific reference for the need to provide an appropriate level of parking that does not discourage efficient use of land. It further states that the levels of parking provision for new development should recognise the needs of people and reflect differences between areas. The draft SPD currently fails to do this and should be amended. Failing this, evidence should be provided to show that the draft standards are required in all areas in the District. Warwick District has high-quality transport links via a number of main line railway stations connecting it to Birmingham and London. This means that some developments will be highly sustainable in nature and the parking standards should reflect this.

#### Disconnect with National and Local Policy

The NPPF is clear that the accessibility of a development and the availability to use public transport is something which should be taken into account when setting parking standards. Policy TR3 of the Local Plan is also clear that levels of parking provision should reflect differences between town centre, edge of urban and rural areas. The objective of Policy TR3 is to seek to balance these competing aims.

The draft SPD fails to take this into account as, for residential properties, there is a lack of any spatial dimension allowing for change dependant on the sustainability of the location and the type of development (i.e. a flatted development for young professionals is less likely to require parking than family homes). This should be re-considered, and the draft SPD revised to bring it in line with the relevant policy. Alternatively, evidence should be provided to show that the standards are justified throughout the District and that all types of residential development would require the same level of parking provision. Our view is that a parking survey does not capture all possibilities and a Transport Assessment may be appropriate in some circumstances; for example, where a development will require less parking provision.

In light of the above, there is a disconnect with both national and local policy. The draft SPD could also affect viability given the amount of parking that is required, the impact this will have on developable area, and the infrastructure required relating to electric vehicles.

#### Cycle Parking/Electric Vehicle Charging Points

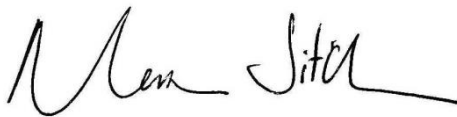
The draft SPD also changes the level of cycle parking that would be required within residential developments. It also sets out requirements for electric vehicle charging points in development at 1 charging point per unit (house with dedicated parking) and one charging point per 10 spaces (unallocated parking). No exceptions are set out within the draft Standards and it is unclear what the requirement is for other forms of development which require parking (i.e. flatted developments). In line with Paragraph 153 of the NPPF, we consider that these standards should be predicated on robust evidence. There is currently no evidence set out in the draft Parking Standards Evidence Paper relating to either cycle parking or electric vehicle charging points. The electric vehicle charging requirement is set out in the Council's Air Quality Action Plan (Addendum) dated April 2014. We are also of a view that consideration of viability is needed, and linked to this, greater flexibility.

#### **Summary**

In summary the draft Parking Standards should be amended to provide clarity in how they are applied (we assume these are minimum standards) The draft Parking Standards should be more flexible and less prescriptive with requisite justification. The draft Standards fail to acknowledge local circumstances in line with national guidance and local policy.

We trust that our response will be given due consideration and we would be happy to meet with you to discuss if required. In the meantime, please contact Ed Pigott or myself on 0121 711 5151.

Yours faithfully,



**MARK SITCH**  
Senior Partner