

Parking Standards and Transport Assessments –  
Supplementary Planning Document (SPD)

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Report on consultation responses to the draft SPD

July 2014

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## 1. Introduction

- 1.1 This report details the findings of the consultation on the Parking Standards, draft supplementary planning document (SPD) – November 2013. The SPD sets out standards and design principles for car parking in new residential and non-residential developments; guidance on when transport assessments and travel plans will be required to address the transport impacts of proposed developments, and standards and design guidance for cycle parking provision.
- 1.2 Public consultation was carried out from 3<sup>rd</sup> December 2013 to 17<sup>th</sup> January 2014. In addition, further consultation was undertaken in July 2014, with those who provided comments on the original draft document, informing them of the changes to the document and inviting further comments.
- 1.3 The purpose of this report is to outline the findings of the consultations and to set out the changes to the SPD as a result of the comments received.

## 2. Consultation process

- 2.1 Consultation on the Parking Standards, draft supplementary planning document – November 2013 was carried out from 3<sup>rd</sup> December 2013 to 17<sup>th</sup> January 2014. The draft document was made available on the city council's website and a printed copy was made available at the Civic Offices. Copies of the document were also made available upon request. Comments were invited by post and email.
- 2.2 Publicity and promotion was undertaken via the council's website and local mailing lists. This included a letter / e-mail sent to known planning and transport consultants (particularly those who have submitted planning applications to the council), consultation with statutory consultees and others who had registered their interest in participating in consultation on any planning related documents.
- 2.3 In July 2014, further consultation was undertaken on the Parking Standards and Transport Assessments - supplementary planning document. Those parties who responded to the original draft SPD were sent a copy of the revised document and invited to make further comments.

## 3. Responses to the draft SPD

- 3.1 The council received four (4) responses, two from local residents and two from planning / transport consultants to the original draft SPD and one (1) further comment on the revised document from one of the transport consultants. Table 1 summarises the comments received (to both consultation) and sets out the changes that have been made to the document.

## 4. Summary and conclusions

- 4.1 The SPD has been amended to clarify text and address some of the comments received. The main changes to the document (other than the title) relate to providing further clarity around the expected standards that will apply to different types of residential developments (Figure 5 within the document), providing further information for developers / applicants on how to assess the parking demand for non-residential developments (Section 4 within the document), and providing further guidance on transport assessments and travel plans (Section 6 within the document).

**Table 1: Summary table of comments and responses**

Ref	Ref within draft SPD	Summary of comments received	Response to comment
1	Whole SPD	The consultation document appears to comprehensively cover the considerations in respect of car parking and cycle parking facilities associated with new developments.	Support noted.
2	Whole SPD	The considerations highlighted for the City Centre area should equally apply to the District Centres areas.	No change to the SPD as the standards for the city centre are consistent with the council's wider parking strategy. The SPD does not prevent lower standards in the District Centres, it just requires the applicant to provide evidence to justify their scheme and in accordance with paragraph 3.8 of the document (i.e. look at the sites location in terms of in terms of accessibility to public transport and to shops and other services and availability of alternative parking opportunities).
3	Whole SPD	If the standards are applied without deviation, because of the concentrated urban character of our city, I believe what may be good development providing new homes, will be constrained and / or prevented.	It is not the intention of the council to apply the standards without deviation. The SPD makes it very clear that properly evidenced deviation will be acceptable.
4	1.4 to 1.6	Key document - DCLG funded Residential Car Parking Research from 2007 - is not mentioned.	Section 1 of the SPD has been amended to reference the DCLG research as it did inform the writing of the document.
5	2.5 and 3.2	Paragraph 2.5 and 3.2 contradict each other in terms of the weight to be given to the table of car parking standards.	The document has been amended to clarify that the council's starting position is that the standards (set out in Figure 5) are expected to be met and what evidence is required should applicants want to provide more or less than the standard.

Ref	Ref within draft SPD	Summary of comments received	Response to comment
6	Whole SPD	Given NPPF requirements, would have expected proposed parking standards to be more comprehensive with more thought given to dwelling type and tenure.	The proposed standards are compliant with the NPPF. The NPPF does not specify that the residential parking standards have to be set out per dwelling type or tenure. In addition, the council has looked at the available information (2011 census data) and considers that as a starting position the expected parking standards should not differ for the different types of dwelling type and tenure. 2011 Census data has been added to Appendix 1 of the SPD.
7	Fig.5	Is there evidence for one car parking space for every two units of active elderly / sheltered accommodation? Is there evidence that these two rather different groups of occupiers have similar parking and cycle storage needs?	The expected standards have been amended to include separate standards for 'sheltered accommodation / retirement housing' and 'nursing / care homes'. The expected standards are based on evidence of built schemes in the city and evidence submitted by service providers with their planning applications.
8	Fig.5	Student cycle requirement (at least 50% of bedrooms) should be less prescriptive, as the location of the halls of residence will be key to amount of cycle parking needed.	The council has changed the proposed standard from 'at least 50% of the bedrooms' to '1 space per student room / bedroom'. Whilst it is acknowledged that for students living within the city centre and close to teaching and other facilities the demand for cycle parking spaces might be lower than say for those students living in Eastney or North End, the council considers that the proposed standard is a reasonable standard to expect as students may work in or wish to explore other parts of the city and wider sub-region and cycling is a cheaper form of transport. However, the council does accept that with robust evidence (provided by the applicant); a lower standard may be acceptable therefore an additional footnote has been added to the table.
9	Fig.5	Will evidence for standards be provided in the appendix to the SPD?	The document has been amended to provide the 2011 census data (see Appendix 1 of the SPD).

Ref	Ref within draft SPD	Summary of comments received	Response to comment
10	3.17	<p>PCC guidance is inconsistent with national guidance on providing for visitor parking (CLG funded Residential Car Parking Research from 2007). Whilst there are times, such as evenings and weekends, when residents are likely to receive significant numbers of visitors in cars, this demand can to some degree be offset by other residents being away at the same time. This balancing effect is most significant when a high proportion of parking spaces are unallocated (and so available to both visitors and residents). This research suggests that no special provision need be made for visitors where at least half of the parking provision associated with a development is unallocated. In all other circumstances, it may be appropriate to allow for additional demand for visitor parking of up to 0.2 spaces per dwelling". There is a worked example at the back that shows how this might be interpreted. The key point is that the amount of visitor parking will vary depending on the ration of shared to allocated parking. My point is that "Usually, this should be an additional 10% of the total parking on the site" is too prescriptive and should read, "This might be an up to an additional 10% of the total parking on the site".</p>	<p>The text has been amended (and moved to Figure 5) to say expected standard for visitor parking is 10% of the total number of spaces.</p>
11	3.25 and fig. 6	<p>Conflicting advice given regarding removal of PD rights from garages.</p>	<p>Figure 6 has been amended to delete the reference to conditions however guidance in paragraph 3.26 remains, as conditions may be used.</p>
12	Fig. 6	<p>Suggests alternative sizes for garage sizes.</p>	<p>Comments noted. Figure 6 has been amended to state 5.5m x 7m.</p>
13	Fig. 6	<p>Detail on length of driveway where gates are present seems over prescriptive and unnecessary.</p>	<p>Agree. Reference to length of driveway where gates are present has been removed.</p>
14	Fig. 6	<p>Questions use of the word 'aisles', should it read 'between bays'.</p>	<p>To provide clarity diagrams have been added to explain each measurement / dimension.</p>

Ref	Ref within draft SPD	Summary of comments received	Response to comment
15	4.3	By what criteria will the council be making judgements on deviation from standard.	The non-residential development section of the SPD has been amended to provide further guidance on how the applicant should assess the parking requirements for their proposal and the type and level of evidence the council will expect.
16	Section 4	Suggest that by not proposing any car parking standards for non-residential development the council is failing in its duty as a planning authority.	Disagree, there is no legal requirement / duty to set car parking standards. The Local Planning Authority has looked at local circumstances and the nature of development in Portsmouth and has taken the view that for non-residential developments, the developer needs to give greater consideration to parking when designing their overall scheme and provide robust evidence to justify their scheme. The document has been amended to provide further guidance on how applicants should determine an appropriate level of parking for non-residential developments.
17	4.5	There is reference to 5% of parking on site to be for disabled people. If general parking is reduced this could lead to under provision.	Paragraph has been amended to clarify that 5% applies to the total number of car parking spaces being proposed. It is acknowledged that if a developer proposes no car parking spaces then no spaces for disabled people would be provided.
18	4.8	For car parks greater than 200 spaces, the % asked for does not make logical sense.	This section has been amended to delete any reference to expected number of spaces. Instead the guidance now states the types of non-residential development where parent and toddler parking spaces will be expected and it will be for the applicant to justify the number of spaces.
19	Fig. 7	Disagrees with locational requirement for parent & toddler car parking; should be left to store manager.	Text has been amended to state that the location of parent & toddler spaces should ideally be located as close to the entrance of the building as possible.
20	Section 5	SPD guidance on travel plans does not acknowledge the fundamental difference between travel plans for residential and non-residential development.	The whole section on travel plans (now section 6) has been amended and simplified. Travel plans should be informed by a transport assessment / statement regardless of whether the proposal is for residential or non-residential development.

Ref	Ref within draft SPD	Summary of comments received	Response to comment
21	Fig. 8	Would benefit from further considerations / justification.	Figure 8 (now Figure 11) has been amended to include reference to the specific land uses as set out in the Use Classes Order to provide further clarification.
22	5.8	Disagrees with requirement for remedial strategy.	No change to the document, the purpose of this section is to make applicants / developers think about the choices they make when producing their travel plans and will provide certainty by setting realistic targets and solutions should those targets not be met.
23	6.2	Rather than direct users to other documents the advice referred to should be reproduced in this SPD.	Where possible, the information is reproduced in the SPD. This reference merely highlights the consistencies between the two documents.
24	6.6	This para does not refer to cycle parking and should therefore be relocated to the section on travel plans.	This is not necessary. The information fits into this section.
25	Fig. 9	Accessing cycles at either end of this example store would be difficult. Conflict with annotations and para 6.13. suggests including better example.	No change to the document, the sketch is for illustrative purposes only (it is not a scaled drawing) and there is no conflict between the annotations and paragraph.
26	Fig. in 6.15	Suggests hoop shouldn't be shown on this diagram of single family home bicycle store.	Comments noted. No change to image required as the text explains the requirements / types of hoops. The image is for illustrative purposes only.
27	Fig. in 6.15	Width of 1.2 m (instead of the more usual 1m) could discourage individual stores in flatted development.	Comments noted, however the council does not believe that 1m width individual stores is good practice and wants to ensure quality storage space is provided. No change to the proposed width of 1.2m.
28	6.24	Phrase 'are likely to be preferable' may not be sufficiently robust.	Paragraph has been amended to say 'will be expected'.
29	Whole SPD	Agree with much of this document on off-road parking.	Support noted.

Ref	Ref within draft SPD	Summary of comments received	Response to comment
30	Whole SPD	Disagrees with approach for on road parking. Car ownership will only be restricted when road become even more difficult to park. We do not have enough space for residents to park close to where they live and the sooner people realise this, the easier it will be to arrive at a more satisfactory and long terms solution for road transport in the city.	This SPD does not seek to deal with the road transport issues of the city. Neither does it promise that people will be able to park close to where they live - it merely recognises that people want to own a car and park it near their home, and seeks to ensure that new development provides for its own parking needs. This document must be read in the context of the council's wider transport strategy as set out in Policy PCS17 of the Portsmouth Plan, the Local Transport Plan and Parking Strategy.
31	Whole SPD	There is little or no mention of other road users e.g. delivery vehicles or temporary workers at premises. Bearing in mind that roads were originally built primarily for their use we now have a policy that is completely contrary to that original purpose despite the service still in much use. That so much attention should be paid to cars which, on average, are driven only 5% of their life is questionable.	There are references to delivery and commercial vehicles (paragraphs 3.25 and 4.22). However, the purpose of this document is to guide developers when drawing up their proposals for new developments and it will be used to determine the acceptability of those planning applications submitted to the council. This document must be read in the context of the council's wider transport strategy as set out in Policy PCS17 of the Portsmouth Plan, the Local Transport Plan and Parking Strategy.
32	Whole SPD	Cyclists are overlooked - the roadside used to be where people could cycle safely, yet this space is now considered primarily for car parking.	Comments noted, however the purpose of this document is to guide developers when drawing up their proposals for new developments and it will be used to determine the acceptability of those planning applications submitted to the council. This SPD recognises that there is great pressure on existing on-street parking (at the expense of cyclists / cycle lanes) and sets out requirements on new developments to try to ease that pressure on on-street parking. In addition, this document must be read in the context of the council's wider transport strategy as set out in Policy PCS17 of the Portsmouth Plan, the Local Transport Plan and Parking Strategy.

Ref	Ref within draft SPD	Summary of comments received	Response to comment
33	Whole SPD	We need to radically overhaul our road policy with the prime objective of providing working vehicles e.g. buses, taxis, freight carriers, domestic tradesmen, health visitors, etc. with clear, uncongested roads. This cannot be achieved without the agreement and support of a sizeable number of residents and therefore I envisage a public design exercise to try to engage and educate people of the problems. It is quite likely this wouldn't initially be successful in achieving a new plan but it could make many aware that we do need a radical re-appraisal of our use of our roads.	Comment noted, but this is not a matter for this SPD, which is trying to address a specific issue (parking standards and transport assessments) in the context of the council's wider transport strategy as set out in Policy PCS17 of the Portsmouth Plan, the Local Transport Plan and Parking Strategy.
34	Whole SPD	There are no references to the accessibility of the area in defining the parking requirements (as included in the previous standards within Appendix 9 of the Local Plan)	The council's approach to the new parking standards is to have an expected standard for residential development based on the type of residential use regardless of its location in the city, with the exception of the city centre area. The SPD does reference location and accessibility of a site under the 'evidence to support proposed level of parking'.
35	3.2 & 3.3	Standards are not clearly defined as 3.2 states parking standards that are expected but in 3.3 it states even where the number of spaces equates to the expected standard the suitability of the proposed parking solution will be assessed as part of the application. Clear standards should be provided that developers should adhere to.	No change to the text, when assessing any planning application the Local Planning Authority has to look all aspects of the proposed parking i.e. the number of spaces, location of those spaces and design of those spaces. For example it would not be acceptable if a developer was proposing the expected standard in terms of number of spaces but that those spaces were not 'useable' due to their location and / or design. The SPD does also provide further guidance on the design of spaces.
36	Figure 5	We do not see how a standard suggesting 1.5 spaces is appropriate. The council are not looking for half spaces so this leads to confusion. If there are an odd number of dwellings being built then the number of spaces to be provided should be rounded up or down. We suggest the standard should state 2 instead of 1.5 spaces.	No change to the SPD, the text in Figure 5 does state that if the sum of parking requirements results in part spaces, the provision should be rounded up to the nearest whole number.

Ref	Ref within draft SPD	Summary of comments received	Response to comment
37	Figure 5	There are no standards for full care accommodation.	Figure 5 has been amended to include separate standards for 'sheltered accommodation / retirement housing' and 'nursing / care homes'.
38	Figure 5	The proposed standard for sheltered accommodation should be the same as Appendix 9 of the Local Plan and be based on accessibility of the area. We do not believe the standards should be reduced (1 space per 2 units is a reduction from the previous standard). Evidence suggests that people are driving later in life so it is likely that the average at which people give up car ownership will be higher, so there is no reason to reduce the standard.	No change to the SPD. See response to 34, above, and the expected standards are based on evidence of built schemes in the city and evidence submitted by service providers with their planning applications.
39	3.17	Visitors to sheltered accommodation should be considered in the standard. We believe 10% additional parking for visitors would be sensible.	Support noted.
40	Figure 5 & following paragraphs	There should be a policy for deliveries and commercial vehicles to sheltered accommodation as noted in 4.13 for non-residential developments. We believe that in this type of accommodation this is a significant issue which should be addressed in the standards.	The SPD has been amended to include a paragraph on deliveries and commercial vehicles for residential development to state that the loading and unloading and parking of such vehicles must be considered in the design of the site and that the council will expect applications to demonstrate how these needs will be satisfactorily met, with particular focus on highway safety.
<p><b>Additional comments received during the July 2014 consultation can be found on page 13</b></p>			

Ref	Ref within revised SPD	Summary of comments received	Response to comment
41	Whole SPD	Why, when there are so many strategic joint initiatives (PUSH, Solent Transport, the LEP) is it necessary for each authority to have its own subtly different parking standards and guidance? In the past one standard covered the whole of Hampshire and this makes a lot more sense from the private sector perspective and would reflect the requirements of NPPF.	Comments noted, however the council has chosen to produce its own standards given the local characteristics of Portsmouth and demand / space for parking.
42	3.24	Whilst personally I support the concept of car clubs, the track record for survival isn't great – even in the London borough authorities seem to have mixed views about them and therefore the extent to which they are prepared to facilitate/support/subsidise them. <b>If</b> a development were large enough to make a car club a possibility the first question to be asked is whether the city council will make spaces on street available, presumably taking away residents' parking or pay-and-display public parking. Has this been thought through?	No change to the SPD. The possibility of removing on street parking / pay and display parking might be considered for a scheme promoting a car club (the council has already removed pay and display parking for a car club in the city).
43	4.1 – 4.14	I wish to make a formal objection as this section includes entirely new and significant content not in the draft published for consultation. Whilst there may be an argument in some circumstances (such as a very substantial increase in floorspace on an existing site) it may be reasonable to expect the developer to undertake surveys and therefore potential parking demand, as a general principle, if the council feels that this sort of information is important then it should undertake and publish the necessary research. It isn't reasonable to expect prospective developers to collect data from employees and customers of unrelated nearby businesses. The council has good contacts within the business community (such as the SignPOST forum) and through post-occupation travel plan monitoring on previous developments to be able to obtain a sufficient	<p>No change to the SPD. Disagree that the changes are fundamentally different to the draft SPD. The principle that developers should engage actively with the parking needs of each individual site and land use, and demonstrate why the proposed parking solution is the right one for that particular development remains unchanged. Instead the SPD has been amended to provide further clarification on the type of 'robust evidence' that would be expected.</p> <p>Whilst the requirement for robust evidence does apply to <b>all</b> new development (for non-residential uses), it does comply with the NPPF as paragraph 4.3 of the SPD states '<i>The level of evidence provided should be proportionate to the type of land uses and scale of development being proposed</i>'. In addition, developers can seek further advice on the precise</p>

		<p>and robust database to inform realistic estimates of modal choice by future employees based on commercial use and location.</p> <p>In addition, Paragraph 153 of the NPPF says “Supplementary planning documents... <b>should not be used to add unnecessarily to the financial burdens on development</b>”, and Paragraph 193 may also be relevant “Local planning authorities should publish a list of their information requirements for applications, <b>which should be proportionate to the nature and scale of development proposals</b>....Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question”.</p> <p>If the text is to be retained then it should only apply in <u>exceptional</u> circumstances and for major developments; it isn't sufficient that it be left as an assumption and a “catch all” for a reason for refusal of otherwise acceptable planning applications because of “lack of sufficient evidence”.</p>	<p>requirements via the pre-application advice service.</p>
44	Section 6	<p>This warrants an objection as the latest version is much more prescriptive - “The council will expect the developer or occupier <u>to carry out an annual review</u> of traffic generation to and from the development (i.e. vehicles counts)” (para 6.7) although the original wording (rather inconsistently) is retained further down as “For travel plans that form part of a planning application, the council will place a requirement for monitoring reports to be submitted to the council <u>at certain predetermined intervals</u>” (para 6.9).</p>	<p>No change to the SPD. Disagree that the requirement is more prescriptive or different between the two paragraphs (6.7 and 6.9). The amended text provides further clarity on the expected monitoring of Travel Plans and these will still be agreed via a Section 106 agreement (as stated in 6.9). The carrying out of a review and then submitting the report to the council may be different time periods.</p>