

# Adoption of the North Somerset Parking Standards Supplementary Planning Document Consultation Statement November 2021

## **Background**

Internal officer consultation was undertaken in November 2020 with officers across Transport and Infrastructure, Planning and Planning Policy. To promote local member involvement, the Strategic Planning, Economic Development and Regeneration (now Place) policy and scrutiny panel was consulted on March 10th 2021.

Public and stakeholder consultation on the draft SPD ran between 17<sup>th</sup> May – 28<sup>th</sup> June 2021. The consultation was publicised through a variety of means including the Town and Parish digest, Nextdoor social media platform and The Knowledge. Through 'e-consult', the consultation was also sent directly to a variety of stakeholders and planning policy consultees. The consultation received 136 responses which represented a significant increase from the 32 responses received at the 2013 consultation for the current version.

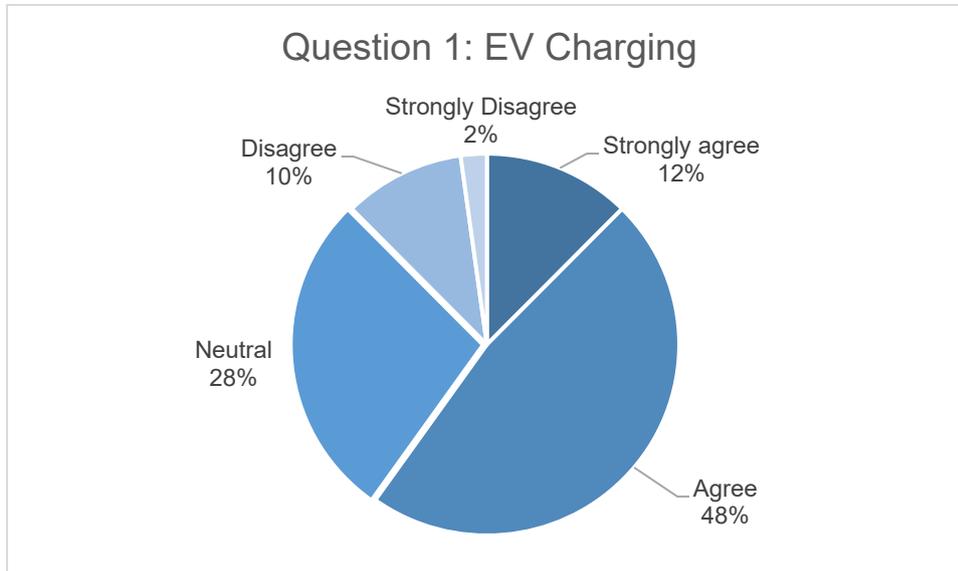
The consultation format included 7 questions, each relating to a specific aspect of the proposals, as well a final question which enabled respondents to provide more general comments.

## **Consultation Responses**

The response to each question is set out below and outlines the issues raised as part of the consultation, as well as the council's response and changes made as a result.

## Question 1:

'To what extent do you agree that the level of Electric Vehicle Charging proposed at new developments (outlined in Principle 19) is sufficient to contribute towards the demands of the Climate Emergency?'



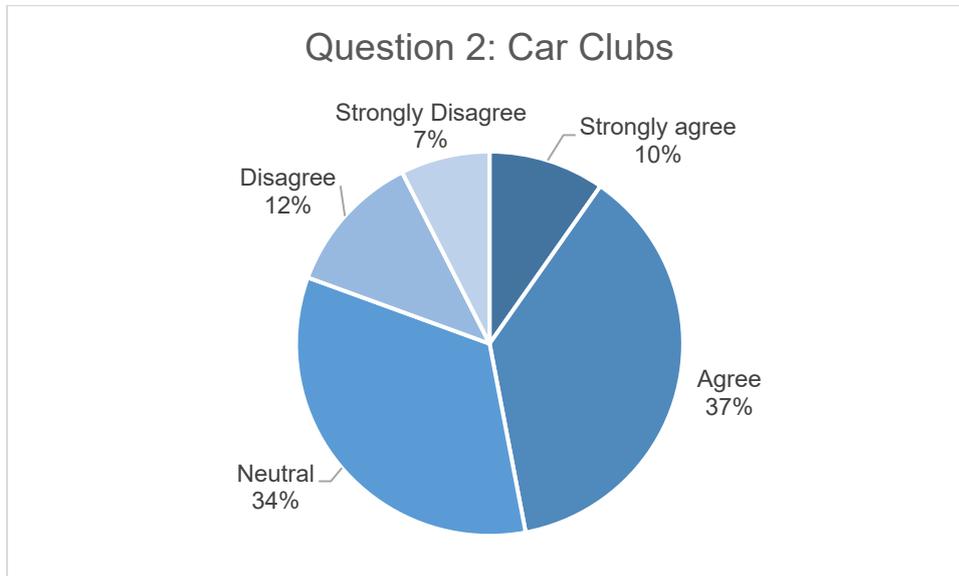
Issues raised and council response:

- Primary concern from consultees regarding EV charging was that the SPD was not ambitious enough and that a higher proportion of Electric Vehicle Charging at new developments should be required. In light of this feedback, and having undertaken a comparison with other recently adopted Parking Standards from other LAs, the following amendments were made:
  - Increase in requirement of active provision to 25% of spaces at unallocated residential development, with the remaining 75% provided with passive provision.
  - For non-residential development, increase to at least 20% active provision and a further 20% passive provision to support the later installation of charge points should this be necessary.
- Concern was raised from a small number of developers regarding the financial burden the proposed EV charging infrastructure may place on developers as well as the capacity of local utilities to manage the increased infrastructure.
  - However, this is not considered sufficient grounds to delay the introduction of minimum requirements for EV charging provision at new development and it is felt that any concerns regarding the impact upon specific local utility services can be addressed through the planning process.
- It was highlighted that national standards may soon be introduced through an update to building regulations.

- In response, the SPD has been updated to acknowledge this, but makes clear that if Building Regulations are updated, developers will be expected to meet whichever standard is greater

## Question 2:

'To what extent do you agree that the proposals (outlined in Principle 20) to request Car Club vehicles at suitable new developments are appropriate?'

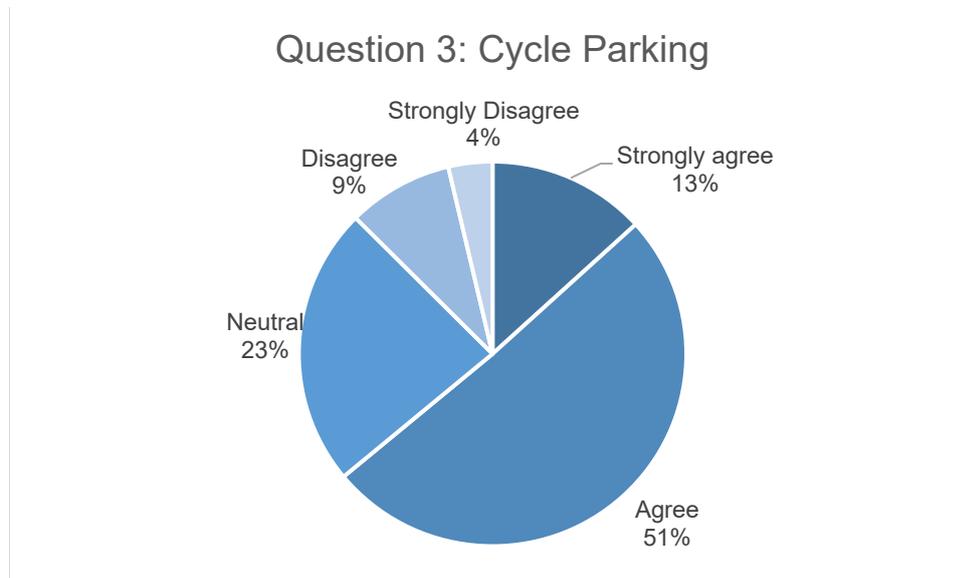


Issues raised and council response:

- Comments received were widely supportive of the principle to introduce Car Club vehicles. It was felt by some, however, that the SPD could go further and introduce a minimum requirement for car club vehicles at all new developments.
  - However, given that the success of car clubs is largely dependent on specific local factors such as population density, a blanket requirement would result in car clubs being delivered in locations that are unlikely to be feasible in the long term
  - It was therefore considered that a case by case approach to the delivery of Car Clubs is more appropriate.

### Question 3:

'To what extent do you agree that the level and type of cycle parking required at new developments (set out in Principle 21 and Appendix A) is sufficient?'

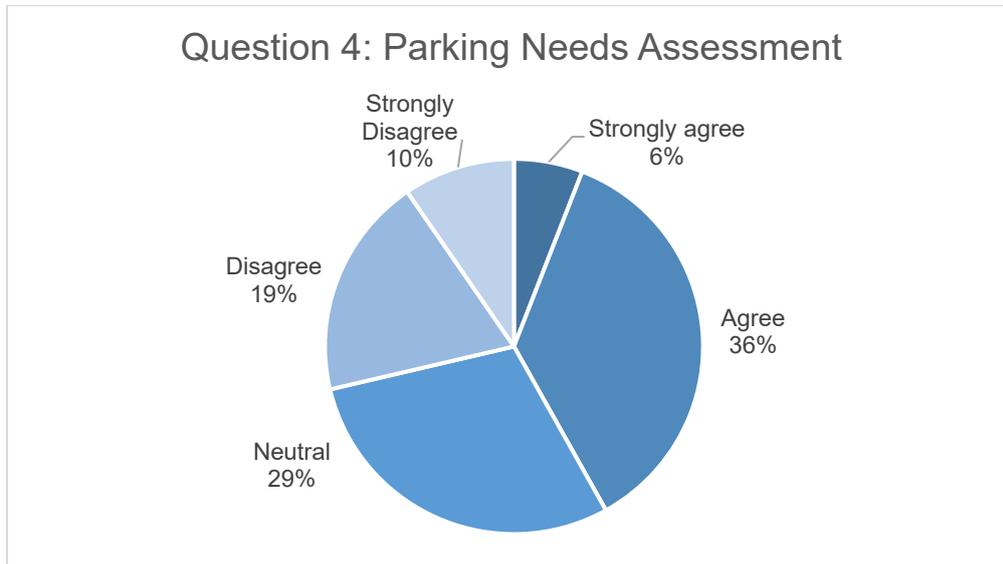


Issues raised and council response:

- It was noted that cycle/scooter provision for children's homes, primary and secondary schools may not be sufficient.
  - The SPD has been amended to reflect the need for a Travel Plan for these types of developments to determine a suitable level of cycle/scooter provision.
- A small number of comments suggested the SPD placed too much emphasis on cycle parking
  - However, given the context of the Climate Emergency and the Council's recent adoption of the Active Travel Strategy, it was considered necessary to provide ample cycle parking facilities at new development

## Question 4:

'To what extent do you agree that the overall balance of the Parking Needs Assessment (set out in Appendix B) is right and everything has been considered?'



Issues raised and council response:

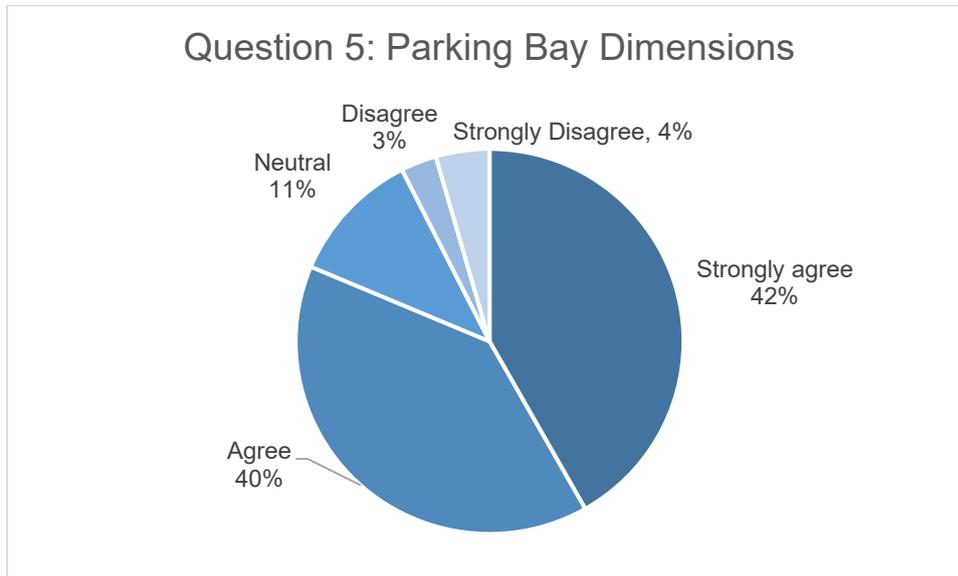
- Of the 29% who disagreed with the proposals, there was a clear divide between those who felt the Assessment offered too great a reduction, and those who felt it did not offer significant enough reductions to discourage car use and tackle the Climate Emergency.
- On the one hand, there were a number of comments suggesting that the Parking Needs Assessment did not go far enough and should provide a greater discount in parking spaces in order to discourage the use of private vehicles in light of the Climate Emergency
  - However, providing too few parking spaces at new development can cause a variety of Highway Safety and other issues and does not necessarily result in reduced car ownership. On this basis, it was not considered appropriate to introduce a blanket reduction in the parking standard.
  - The Assessment is therefore aimed at delivering a level of parking that reflects local circumstances and local car ownership levels and the Highways and Transport Development Management Team have tested a wide variety of sites across North Somerset to ensure this is the case.
- Some organisations also undertook case studies and felt that the assessment results still provided too many parking spaces in relationship to local car ownership levels and therefore greater discounts should be applied to the level of parking required
  - However, these case studies tended to rely upon 2011 census car ownership data and it is widely accepted that car ownership levels have since increased. When adjusted to reflect projected growth, the

Parking Needs Assessment is more in line with anticipated car ownership levels

- It was also suggested that lower standards for affordable housing be introduced given that there is evidence to suggest that affordable developments tend to have lower car ownership levels
  - However, whilst it is acknowledged that affordable housing developments tend to have low car ownership levels, this was not considered appropriate on the grounds of equality, in that it could limit access to vehicles for those groups more reliant on affordable housing.
- On the other hand, a number of comments disagreed with the principle of offering any discount to the standards set out in the SPD
- The parking issues experienced at the Locking Castle and Port Marine Developments were frequently cited as justification for this opinion
  - However, the issues experienced at Locking Castle and Port Marine were caused primarily by the application of 'maximum standards' that were in place prior to the 2013 Parking Standards SPD, as well as the high reliance on small garage spaces and rear parking courts that are both often under utilised
  - Both sites had been thoroughly tested by the Highways & Transport Development Management (HTDM) team which has confirmed that that even with the application of the Parking Needs Assessment, a level of parking that would accommodate anticipated vehicle ownership would be provided
  - In addition to this, to ensure parking issues are avoided, garage spaces will not count towards the standard where the Parking Needs Assessment facilitates a reduction
  - The assessment is also very well established at other authorities and the HTDM team have received positive feedback regarding the application of the assessment and the level of discount provided by the assessment.
- There were also a number of positive comments recognising the potential of the Parking Needs Assessment to facilitate higher density development less dependent on private cars in the right location.
- It was also noted that the assessment now reflects the NPPF requirement at para 107 to take into account the accessibility, public transport opportunities, and car ownerships when setting local parking standards.

## Question 5:

'To what extent do you agree that the proposal to increase minimum parking bay dimensions from 2.4m by 4.8m to 2.5m by 5.0m is appropriate?'

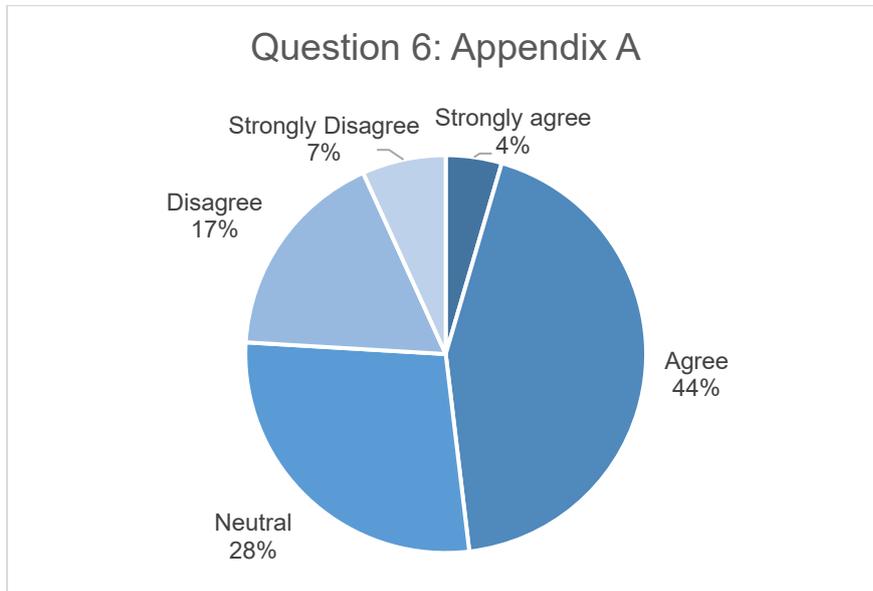


Issues raised and council response:

- Positive comments focused on the inadequate dimensions of current parking bays, as well as the positive impact it will have for users who may struggle with the constrained nature of current bay dimensions.
- However, valid concerns were raised regarding the additional land required to deliver increased parking bay dimensions and subsequent impact on housing density, as well as the potential to encourage the use of larger, less efficient, vehicles.
  - In light of these concerns, it is proposed to retain the proposed increase in width to 2.5m which is where the majority of access issues occur but retain the existing 4.8m length which allows for the majority of vehicles to use a space without overhanging.

## Question 6:

'To what extent do you agree that the level of parking required at each development type (as set out in Appendix A) is suitable?'

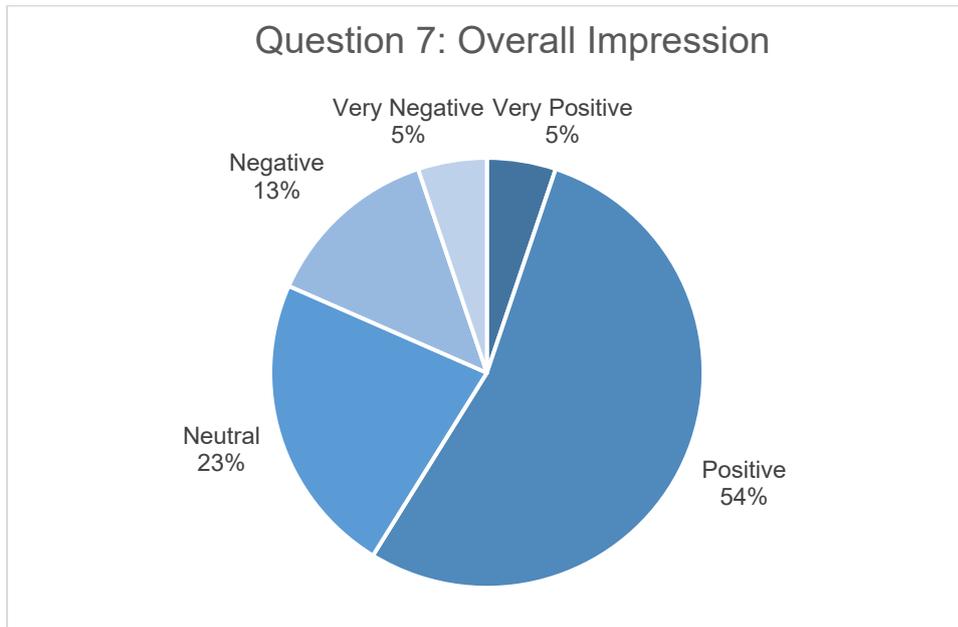


Issues raised and council response:

- Of those who disagreed, there was a general feeling that the level of parking at some developments, e.g. hospitals, may not be sufficient and would be better determined by a Transport Assessment rather than a blanket standard.
  - In line with this, the standards have been amended so that, whilst still retaining an absolute minimum requirement, it is also noted that the final level of parking should be subject to a Transport Assessment and Travel Plan

## Question 7:

'What is your overall impression of the changes proposed as part of this review?'



Issues raised and council response:

- Of the negative responses received, many were based on factors outside of the scope of the Parking Standards SPD, particularly the existence of pre-existing parking issues across the Authority Area.
  - The SPD, however, relates only to new development and therefore does not have any influence/ability to rectify parking issues at existing locations.
- A number objections were received on the basis that it was felt there is already too much development proposed within North Somerset.
  - Again, however, this is not within the scope of the Parking Standards SPD to address and the SPD is only concerned with ensuring sufficient levels of parking at new development.
- There was also a minority who objected to the use of the term Climate Emergency and thought the document was too heavily focused on Active Travel
  - However, it is considered that the SPD needs to be updated in line with the Council's declaration of a Climate Emergency and recently adopted Active Travel Strategy.
- Regarding the positive feedback received, this focused primarily on:
  - Measures to tackle the Climate Emergency including EV charging provision and Car Clubs.
  - The ability to provide more appropriate levels of parking in certain locations through the Parking Needs Assessment.

## Question 8:

'Do you have any comments or suggestions about the document you would like us to consider?'

Issues raised and council response:

- The majority of comments have been considered above although a number of them did not relate directly to any of the above questions:
- Most significantly, there were a number of comments that the Parking Standards SPD does not sufficiently meet the needs of disabled users. Whilst the SPD was not proposing any significant changes in this respect, it was felt that the existing standards are inadequate and need to be updated in line with more recent guidance. In light of these comments, the SPD has been updated to:
  - Enlarge Disabled Bay dimensions
  - Introduce dimensions for parallel disabled bays and disabled EV bays
  - Amend guidance on height restrictions at non-residential developments
  - Introduce comprehensive guidance regarding the type of non-standard cycle parking the Council will expect at new developments
  - Greater provision for mobility scooters at new developments
- It was also noted that the Parking Survey guidance (which outlines how developers should undertake parking surveys where required by the Development Management Team) should be more tailored to each individual application.
  - The SPD has been amended to request that prior to undertaking any survey, the details be submitted to the Highway Authority for authorisation to ensure that the HA are satisfied with the proposals.