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Dear Madam / Sir,

### **Draft Parking Standards SPD**

On behalf of Brighton & Hove Friends of the Earth (BHFOE) I would like to welcome the opportunity to comment on the Draft Parking Standards Supplementary Planning Document (SPD). This is an important document that could have a big impact on the fabric of the city and the way that people move around.

Done properly it could encourage more people to cycle by providing them with secure and convenient cycle parking both at home and when accessing shops and services around the city. However, there is also a danger that it could encourage a long term incremental increase in car parking, the cumulative impact of which, particularly in central areas, could be quite severe, bringing more cars into the already heavily congested bus corridors causing congestion and having a detrimental impact on the local economy. There is also the concern that it could also lead to the long term loss of gardens and impact on the traditional street scene by increasing the number of garage doors or cut-throughs to access 'garden' parking, or result in more hard-standings on front gardens. In all these situations, it would lead to more crossovers (access across the pavement) which is undesirable on safety, aesthetic and maintenance grounds.

BHFOE welcomes the ambition of draft SPD but unfortunately believes that it is found wanting in many areas and as it stands could actually cause great harm.

### **Cycle parking**

Rather than repeat what Mark Strong has written, BHFOE would like to endorse his submission on cycle parking. In terms of the draft SPD failing to address current problems, BHFOE would add that the Co-op development in London Road is a more recent example

where the failure to specify bike parking standards has actually led to cycle parking not being installed. Here the developer bought parking stands unsuitable for installation on the public highway and has refused to change them to date as it was given no prior specification. The result is the stands have not been installed and there is a lack of cycle parking in the area serving the new development.

BHFOE would also emphasise that all developments need both short term (visitor) and long term (resident/employee) cycle parking. This is not apparent in the current standards where Houses in Multiple Occupation, for some reason, only require long stay provision for residents.

The SPD needs to address these issues as well as those raised by Mark Strong.

### **Car parking**

This is the area that causes BHFOE most concern and it does not believe that the standards have been properly thought through or their impact correctly assessed. In particular, BHFOE believes that:

1. The standards could allow an increase in car parking over time in the central area, when this area already has a large public car parking provision and suffers from congestion and air pollution. The SPD is therefore likely to increase congestion and make it harder to reduce emissions. On the latter point, the Council has a legal duty to reduce air pollution as soon as possible and if this plan delays the time before the area becomes compliant, as it currently could, this is likely to be unlawful. This zone should have car-free standards.
2. If the point above is not accepted then at the very least all roads leading onto the critical bus corridors of Castle Square/North Street/southern part of Dyke Road, Western Road, Queens Road and St James Street, and potentially parts of Lewes Road too, should be zoned for car-free development so as not to add to more cars and congestion into these areas. Even a few extra cars would create congestion and pollution, as can be seen by the hold-ups experienced by taxis and buses approaching the Clock Tower, caused by a relatively few private cars coming down Queens Road.
3. At a minimum the central area zone should be extended east to Upper Rock Gardens and as far north as Elm Grove. Given the pressure on road space and the congestion already in St James Street, it cannot be sensible to have standards that would encourage yet more cars into this area, regardless of whether the area is to be pedestrianised or not. Further thought needs to be given to the impact of allowing more car parking beyond the central area's boundaries and whether the central area should be expanded more broadly. It also raises the question as to whether the parking zones should be determined by an accessibility assessment instead of the rather arbitrary approach currently adopted.
4. The currently defined key public transport corridors are illogical and not fit for purpose. They do not appear to relate to any accessibility assessment or level of bus or other provision and as a consequence fall short of where they should extend to and are too narrowly defined. If a corridor is well served by public transport, then that corridor should be defined as being at least 400 metres wide, and potentially up to 800 metres wide, to cover all the areas that are served by that corridor and not the rather arbitrary approach currently adopted. This zone also strays into areas not covered by the City Plan, extending into the jurisdiction of the South Downs National Park Authority. The issues with this zone as currently proposed are as follows:

- a) The zone extends into the South Downs National Park (SDNP) (beyond the City Plan boundaries) in three locations and this needs rectifying. These are:
    - Patcham Place and other land in the SDNP in the A23 corridor
    - Woodland around the Alternative Centre for Education, Queensdown School Road in Moulsecoomb
    - Part of Roedean School and the land between the marina and Rottingdean
  - b) The whole of the seafront west of West Street is included in this zone, where public transport provision is lower and in places non-existent, yet the western end of Portland Road and Church Road which are well served by buses and by Portslade Station are all excluded. This makes no sense whatsoever and the zone should be extended to include these roads and the area around Portslade station.
  - c) Dyke Road is broad as well as long, and what would be expected in shape and size when defining a public transport corridor, but perversely this is probably the least well served corridor.
  - d) The A23 which is fairly well served by buses and has fairly good cycle facilities is ridiculously narrow although it rightly extends up to near the A23.
  - e) Ditchling Road north of Fiveways has been excluded, yet is served by regular buses as good as, if not better than, Dyke Road. It should be included up to at least Friar Road or Woodbourne Avenue.
  - f) Lewes Road is the most bizarre. This corridor has the best and most regular bus services, has the best cycle facilities and is served by two train stations, yet it is the shortest defined public transport corridor in the city, only going as far as Moulsecoomb station. This corridor should extend up to and include the two universities and the football stadium at Falmer.
  - g) If the zone was based on public transport accessibility it would include more of the Fiveways and Hollingdean areas which are well served by buses and close to both London Road and Moulsecoomb stations.
5. BHFOE is very concerned that the standards, despite being maximum standards, could lead to a loss of historic street scenes and private green space as developments tarmac over gardens and open space to provide for parking (including for disabled) up to their allowable limit. This is of particular concern when rebuilding takes place in streets where vehicles wouldn't have been accommodated off-street historically, as this SPD will encourage that to happen. There needs to be something in the SPD saying that where there hasn't been car parking provision off-street previously, certainly in the central area, if not more widely, then off-street provision is not appropriate, particularly if it will alter the appearance of the area and lead to the loss of green space.
  6. Providing more off-street parking would result in more pavement crossovers which is undesirable on safety and maintenance grounds, particularly in more central areas where footfall is higher.
  7. Larger commercial premises, particularly retail, should not be allowed to develop their own private parking but instead should have to share public car parking. This will not only prevent sterile car parks appearing over time but would also enable the parking to serve a wider area, including local shops, and prevent larger stores gaining a

commercial advantage over smaller independent operators. It would also be more efficient as it is likely that less land would be required for car parking overall.

8. BHFOE believes that the car parking standards for the public transport corridors (and other accessible locations) are too lax and do not need to be so generous, particularly near highly accessible corridors such as Lewes Road.

### **Strategic Environmental Assessment and Sustainability Appraisal**

BHFOE is concerned that the cumulative impacts of allowing more car parking in central areas and elsewhere on green space, biodiversity, congestion, pollution, the historic streetscape and the local economy have not been properly assessed. The level of the standards also affects the severity of the impacts, with laxer or more generous car parking standards potentially having a far greater negative impact. The quality, level and location of cycle parking also have a profound effect on whether the provision of cycle parking will promote sustainable transport. None of these issues appear to have been considered.

BHFOE therefore disagrees that a Strategic Environmental Assessment (SEA) is not required and is concerned at the quality of the scoping exercise which has ascribed positive benefits to the SPD without any real justification or evidence.

It is also concerned that these issues have not been properly addressed within the Sustainability Appraisal, where objective 1 on biodiversity was removed as not being relevant. In addition, it fails to see how the Sustainability Appraisal has influenced or attempted to measure the impact of the draft SPD.

In particular, the exclusion of areas which obviously should be part of a defined public transport corridor such as along Lewes Road or Portslade Station could lead to more car based development in those areas, wasting land which could be better used for more housing, office space or even green space. This could encourage car use and undermine more sustainable travel choices. None of this appears to have been considered.

Overall, BHFOE is hugely disappointed with this SPD and concerned that if it is allowed to proceed as it stands, that it could cause great harm.

If you have any questions about our comments, please do not hesitate to get in touch.

Yours sincerely,

Chris Todd

Planning & Transport Campaigner