

# **Leeds City Council CAR PARKING DRAFT SPD**

## **Consultation Statement – November 2015**

### **1. Summary**

1.1. This document sets out the public consultation process undertaken for the production of the Leeds Parking Supplementary Planning Document. The process is described along with the key points raised and the resulting alterations made to the document.

### **2. Consultation Process**

2.1. The Consultation documents produced and available for the public were the Draft Parking SPD and associated consultation statement.

2.2. The consultation period was between the 22<sup>nd</sup> of August and 17<sup>th</sup> October 2014. The standard 6 week consultation period for planning documents was extended by two weeks due to the summer holiday period in which the consultation began.

2.3. The consultation was open to any member of the public and promoted via the Leeds Talking Point webpage. Over 900 individuals or groups were also invited to contribute via email, including:

- Local Ward Members
- Parish Councils
- Highways England (was Highways Agency at that time)
- Environment Agency
- Neighbouring Local Planning Authorities
- West Yorkshire Combined Authority
- Chamber of Commerce/Property Forum
- Planning/Transport Consultants
- Previous respondents from consultations on parking and Core Strategy
- Local MPs
- Local interest groups

2.4. The consultation documents were available to download via the Leeds City Council website, available in all libraries and paper copies were also available in the development enquiry centre in the Leonardo Building. Promotion was undertaken via a press release, social media and via email to all local ward members and mailing lists of interested parties from the previous consultations on the core strategy and commuter parking interim policy.

### 3. Consultation responses

3.1.41 separate responses were received from the following parties:

- 11 individual members of the public
- Highways Agency (now Highways England)
- Sustrans
- Conservative Group, Leeds City Council
- Leeds Cycling Campaign
- Aireborough Civic Society
- MEPC
- English Heritage
- Elite Parking
- Cllr Colin Campbell, Liberal Democrat member for Otley & Yeadon
- Carlsberg UK
- Aireborough Neighbourhood Forum
- Environment Agency
- Wakefield Council
- BAM Monkbridge Ltd
- The Theatres Trust
- Leeds Civic Trust
- Arla Foods
- Holbeck Neighbourhood Forum
- Little Woodhouse Community Association
- Sainsburys
- Network Rail
- Leeds Residential Property Forum
- Road Haulage Association
- University of Leeds
- Leeds Chamber of Commerce
- Natural England
- West Yorkshire Combined Authority
- Cllr Ron Grahame, Labour member for Burmantofts & Richmond Hill
- Caddick Developments
- Liberal Democrat ward members for Weetwood

### 4. Issues raised

#### **General Support**

4.1. The following expressed general support for the principle of the SPD, although in many cases this was caveated with more detailed comments which are considered further in this report:

- Highways Agency (now Highways England)
- Sustrans
- Aireborough Civic Society
- MEPC
- Aireborough Neighbourhood Forum
- Leeds Civic Trust
- Leeds Chamber of Commerce

- West Yorkshire Combined Authority
- JM Bradford

## **Principles**

### *Parking Hierarchy*

- 4.2. Comments were raised in relation to the 'Parking Hierarchy' at section 3.1. These comments correctly pointed out that disabled, cycle, motorcycle, and car club parking were not on the hierarchy. It also did not contain any reference to park and ride. These comments are accepted and the hierarchy has been revised.

### *Disabled parking*

- 4.3. The LCC Access Officer and several others commented that disabled parking was not given enough consideration within the document. This is partially accepted, as although disabled parking standards are, for the first time clearly set out in chapter 9, the importance of such parking is not defined earlier in the SPD. Additional references to disabled parking have been added in chapters 1, 2, 3, and 4.

### *Servicing and truck parking*

- 4.4. The Road Haulage Association raised concerns about the lack of reference to the needs of commercial vehicles. This can be split into two distinct areas; firstly servicing provision with the city and local centres, and secondly longer term 'truckstop' type parking. Servicing is not the intended focus of the SPD – existing provision, or the lack of it is a traffic management function and all new development is considered in terms of servicing provision. However it is considered that further references should be added to the SPD to reinforce the principle that new development should be able to demonstrate adequate servicing provision and the importance servicing to successful town and local centres. Servicing is a separate issue to parking - trucks should only be parking in centres to facilitate servicing. 'Truck stops' for rest and other facilities are provided at key points on the strategic highway network.
- 4.5. Additional references to the importance of servicing needs have been added in sections 4, 7 and 9.

### *Strategic Road Network*

- 4.6. The Highways Agency provided a detailed and lengthy response with the common theme being in relation to potential impact on the Strategic Road Network. The Council consults with the HA on all schemes that may impact on the SRN and the points raised are fully noted. Specific responses are provided in the detailed comments below.

### *Boundary of Core and Fringe zones*

- 4.7. The City Centre has been divided into three areas in terms of parking guidelines – these are the Public Transport Box, Core, and Fringe areas. The PT Box remains as previously defined in the UDP and no comments have been received in relation to its boundary. The Core and Fringe areas have been redefined and this has raised comments / objections from three parties:
- BAM Monkbridge – contend that their site on Whitehall Road should be classified as Fringe rather than Core as per the previous UDP
  - Caddick Developments – contend that their site at Quarry Hill should be reclassified and not in the Core. It was previously a Prestige Development Area (no longer recognised by the Core Strategy).
- 4.8. In both cases above the developers face more restrictive long stay parking maximum parking standards for any new planning application than previously. Notwithstanding that both sites have extant permissions which could be built out; it is considered that both are within easy walking distance of the station, with Quarry Hill immediately adjacent to the Bus and Coach Station as well. The type of development proposed is of a 'Core' City Centre type. Therefore it is considered that they are correctly positioned within the Core boundary. In the case of Quarry Hill short stay parking to serve shopping, commercial and leisure uses in the vicinity could be provided in addition to the long stay maximum.
- 4.9. Holbeck Neighbourhood Forum support the principle of defining the Core and Fringe Parking zones but suggest that the Fringe is extended to cover the whole of the Holbeck Neighbourhood Plan area. This additional area is mainly residential with some limited employment sites. There is no observed problem with commuter parking within the area. At this stage it is not considered necessary to extend the Fringe controls to cover this area. The SPD would be subject to regular review through the Annual Monitoring Programme and if problems arose in the future then the Fringe could be extended at that point.
- 4.10. It is accepted the SPD wording around the definition of Core and Fringe and the methods for deriving this could be improved and this action has been undertaken.

#### *Airport car parking*

- 4.11. It was suggested by LCC Highways Development Services that the SPD document should include a policy to secure a s106 car parking levy for each additional new space associated with the airport usage (on or off site) per year for the lifetime of the development. This could then be used to support public transport services and sustainable travel initiatives.
- 4.12. While such a levy has been successfully used elsewhere in the UK it is not considered to be required as contributions towards sustainable travel modes have been secured for all recent new car parks and airport development. These lump sums are more flexible in nature as they can be used to fund infrastructure as well as subsidising public transport services.

## Economic Principles

### *Importance of car parking to economic vitality*

- 4.13. A number of consultees welcome and support the wording in the SPD relating to the importance of the link between car parking and economic vitality. Issues of parking charges are considered further in paragraphs 4.25 to 4.28. However both Sustrans and the Leeds Cycling Campaign questioned the importance of this link and the lack of evidence pointing to various studies highlighting the role of walking and cycling trips. The Portas Review is criticised for lack of objective evidence. The Cycling Campaign set out that *'Vibrant, successful local, town and city centres would be created by focussing on 'placemaking' and ensuring that our streets are welcoming and safe places to walk and dwell, rather than simply roads where pedestrians and cyclists are subservient to the requirement to ensure smooth flow of traffic.'*
- 4.14. The Portas report (para 3.3.2) refers to both, the importance of 'free controlled parking schemes that work for their town centres (recommendation no.9) as well as 'Town Teams should focus on making high streets accessible, attractive and safe (recommendation no.10). It is not considered that these recommendations are contradictory - a good and vibrant centre will have both and the Council will continue to seek environmental improvements to centres through other funding streams. An appropriate level of long and short stay parking is important to the city and local centres, along with good urban design and pedestrian and cycling accessibility. The SPD seeks to confirm this through the use of maximum car parking standards in the city centre, and policies of no parking within the Public Transport Box. In addition minimum standards for cycle and motorcycle parking are proposed.

## Parking Policies

### *City Centre Parking*

- 4.15. The Highways Agency, Aireborough Civic Society, Leeds Civic Trust, WYCA, Sustrans and S Lightfoot all considered that the proposed policies in the City Centre were not robust enough with the following issues raised:
- Concerns in regard to encouragement of short and medium stay car parks in the city centre
  - Vague references to 'sufficient' supply of commuter parking
  - Lack of references to parking pricing as a means to control demand
  - Turnover needed to ensure efficient use of parking spaces
  - Temporary commuter car parking within the fringe is undesirable given current congestion levels at peak times. It also discourages the development of brown field sites for economically useful purposes.
  - Caveats in Policy LPP3 (section 6.6) in respect of the Fringe are too vague
  - The Council should specify more clearly the criteria for granting car parking permissions on vacant sites. Para 6.6.3 is too vague

- The LTP sets out the presumption that City Centre long stay parking should be re allocated as short stay parking – this should be more explicit in the SPD
- Rather than use valuable City Centre land / road space on short and medium stay car parking this space would be better utilised in place-making projects aimed at increasing levels of sustainable travel. The key to saving our high streets is to make them more pleasant, safe and accessible places, not a parking free for all.
- LCC should retain the ambition of working towards zero car parking provision in the 'Public Transport Box' and implement an ambitious deadline for this to be achieved.
- There should be no temporary commuter parking permissions granted in or around the Leeds city centre and the aim of the SPD should be to reduce such car parks rather than allow more.

4.16. The Chamber of Commerce argued that for varying reasons not everyone can take advantage of public transport and given the limited progress in delivering these alternatives there was a need for sufficient commuter car parking capacity.

4.17. Several respondents (Leeds Chamber of Commerce, BAM Monkbridge Ltd (GVA), Carlsberg UK and Elite Parking Ltd) argued for greater flexibility in the treatment of temporary cleared site commuter parking.

4.18. The SPD aims to balance the comments above with those that call for more relaxed levels of parking. The references in the document to 'sufficient commuter supply' of parking in the city centre are there to ensure a balanced and thriving economy. The SPD contains a presumption of no net increase in permanent public commuter car parking, but now allows for the re-provision of existing permanent parking and additionally the provision under certain circumstances of up to 500 permanent public commuter spaces during the Plan period (a 5% increase on current levels).

4.19. It is agreed that commuter parking in the city centre fringe has negative impacts, however until adequate alternatives are in place it is considered appropriate in supporting the city economy.

4.20. The South Bank proposals include for significant areas of new public realm and a 'city park', this will include areas that are currently used for car parking such as Meadow Lane.

4.21. Amendments have been made to the wording on commuter car parking to make the policies within the SPD clearer. LPP3 now includes planning considerations in the list of 'merits' that are to be taken into account when deciding on permissions.

4.22. The renewal of current temporary planning permission for certain cleared site commuter car parks is being considered separately by officers. It is proposed that the reduction of the number of these spaces will take place in a managed way, depending on the delivery of alternative travel options via public transport and park and ride.

### *Parking in Local Centres*

4.23. Representations concerning the parking policy in local centres were received from the Conservative Group of Leeds City Council, City Councillor Colin Campbell, Aireborough Neighbourhood Forum, Little Woodhouse Community Association and D.Bonnett. The comments were as follows:

- The Conservative Group would not support any increase in parking charges in town and district centres.
- District Centres should be dealt with on an individual basis to ensure there is sufficient parking to meet each centre's needs.
- New commercial developments should be encouraged to provide the parking they require and measures put in place to prevent overspill car parking onto surrounding streets.
- If charging is to be introduced for Council run car parks in town centres consideration must be given to the impact this will have on the local community.
- Any charging in local centres would damage their vitality.
- Charging in local centres will only encourage people to shop and visit elsewhere.

4.24. Management of local and town centre car parks managed by Leeds City Council will continue to be undertaken with full consultation with Ward members and local stakeholders. There are a range of mechanisms to improve the efficiency of limited car parking spaces if required. These would be considered on a site by site basis.

4.25. Considerations of parking for commercial uses needs to balance economic prosperity, local amenity, environmental impacts, best use of land, sustainable travel patterns etc. The SPD promotes a degree of flexibility but there is an important change to 'expected' from 'minimum' levels of parking to reflect such concerns.

### *City Centre Parking Charges on Evenings and Sundays*

4.26. A significant number of responses were received regarding the parking charges at Leeds City Council on street and off street parking locations in the city centre.

4.27. The decision made in 2013 to charge for on street parking on evenings and Sundays still proves to be controversial. Aireborough Civic Society gave comments of support, however the following respondents felt that the charges were having a negative impacting upon the City Centre economy:

- G Langley
- K Lloyd Baxter
- Conservative Group
- J Thompson

- Little Woodhouse Community Association
- Leeds Chamber of Commerce

4.28. There is no evidence that evening and Sunday charging is impacting on the city centre economy. The charges are modest at £2 flat fee 6pm to 10pm and £1 for up to 4 hours on Sunday and £4 over 4 hours. The charges have helped generate turnover of spaces and make finding a space easier. Footfall in the city centre (inc evenings and Sundays) is larger than ever. The £2 charge for night time workers is small and not considered a deterrent. In comparison, workers during the day would have to pay much higher charges.

4.29. The SPD does not therefore propose any changes to the current arrangements.

#### *Cost of City Centre Parking*

4.30. The SPD sets out the rationale for the pricing of car parking which is under the control of Leeds City Council. A variety of responses were received, supporting both higher and lower charges.

4.31. The principle of charging more for parking than public transport fares was supported and should be strengthened according to comments from Aireborough Civic Society, Highways Agency and the West Yorkshire Combined Authority. Charges were felt to be too high by the Conservative Group and D Bonnett.

4.32. Most off street parking in the city centre is privately controlled and the costs market driven. The Council seeks to balance the needs of users, the economy, sustainable travel and congestion, competition, and income in setting its parking charges.

#### *Charging at out of town centres*

4.33. Two respondents, Aireborough Civic Society and J Thompson, commented that charging should occur at out of town shopping centres to enable fairer competition with the city centre and local town centres. It is not possible to retrospectively introduce car parking charges in existing out of town centres as these are private car parks. The Council supports a centres-first approach where retailing is directed to the City Centre and designated town and local centres in order to promote their vitality and viability as the focus for shopping. This is subject to sequential assessment which, in principle, allows for out of town shopping centres where it can be demonstrated that no other suitable sites are available in the primary shopping areas and then its edge, followed by the relevant designated centres and then edge of centre locations. Similarly, out of centre retailing is subject to impact assessment, where applicants are required to demonstrate that no significant adverse impact would arise on the vitality and viability of designated centres or proposals within them.



## *Parking Guidelines*

- 4.34. A large portion of the Parking SPD is concerned with the detailed guidelines regarding the level of parking expected at new developments. As such, there were detailed responses from a number of parties as follows:
- 4.35. Highways Agency, Sustrans and Aireborough Civic Society felt that the separate parking standard for call centres should be removed. Experience shows that call centres typically have a higher employee density than other office uses and often work on overlapping shift patterns which can create overspill parking problems. The SPD sets out that any such application must be accompanied by a robust travel plan and conditions may be placed upon any permission requiring a reduction in parking should the use be changed.
- 4.36. Comments were received from both the Conservative Group and Councillor Campbell regarding the adequacy of the guidelines for housing developments. It was felt that the levels were too low and consequently caused problems of overspill parking on street. The Parking SPD does not include parking standards for residential developments, beyond student and HMO uses, as this is contained within the adopted Street Design Guide.
- 4.37. The Parking SPD and Street Design Guide seek to ensure that residential development is adequately served by parking. The methodologies for calculating parking provision, outlined in the Street design Guide, take account of car ownership levels, property size and type of parking proposed.
- 4.38. It is acknowledged that there has been a legacy issue in some residential developments, stemming from national policy which imposed maximum parking standards. The approach in recent years is felt to give a more appropriate level of parking as restrictions are not imposed by the Council and individual sites are taken on their merits when agreeing the level of parking to be provided.
- 4.39. The standards proposed for student housing/HMO developments were contested by Leeds Property Forum and the University of Leeds. They felt that the definitions set out in chapter 9 for student accommodation and HMOs required clarification and that the expected parking requirements set out are unachievable and unnecessary given the level of car ownership for HMO and students.
- 4.40. As per standard planning management process, change of use is defined as new development. Therefore the guidelines set out in chapter 9 apply to change of use / conversion as well as new build development. The definition of HMO use is clearly set out within the planning system as C4 usage. Purpose built student accommodation falls within the C3 land use category, but in many cases is restricted to students only through planning obligations.
- 4.41. Given the comments from government, regarding appropriate levels of parking being provided in residential developments, the standards set out for HMOs are justified.

4.42. Detailed comments on the standards proposed for specific use classes were received as follows:

- Lack of reasoning behind caps on short stay provision for cycle parking.
- A greater recognition of the Parking Guidelines as precisely guidelines, accepting that there may be flexibility within individual schemes.
- Hot food takeaways and private hire operations to provide parking spaces.
- 1:1 staff car parking not required for Higher/Further Education
- Queries over whether the guidelines provide enough parking for offices and residential uses.
- The standard size of parking spaces in supermarkets is too small.

4.43. It is accepted that the draft SPD gives no reasoning for the cap on short stay cycle parking. The cap is proposed to ensure that cycling provision is not over specified, for example a large supermarket would require over 30 short stay spaces using the 1:250 ratio, the cap is considered a reasonable level of provision allowing the developer to provide higher quality provision. Through the travel plan process additional spaces should be provided if required.

4.44. The SPD already acknowledges the need to have some flexibility in considering parking numbers for new development, which will require justification from developers and consideration first of other strategies such as Travel Planning.

4.45. Table 1 within the SPD shows the expected parking levels for new hot food takeaway. Private hire would fit within the sui generis use and applications will be considered on their merits.

4.46. As stated within section 9 of the SPD, the guidelines for three D1(Non-Residential Institutions) use classes are based upon the number of staff. However it is intended that this provision would not be solely for staff but for the establishment as a whole and allocated/controlled within the context of their travel plan.

4.47. Office densities do vary but the Employment Densities Guide (OffPAT 2010), gives a general office density of one FTE per approx 15sqm (gross external). Once absences are included for this equates to approximately one parking space per two staff in out of city centre locations. More generous parking provision is allowable for call centres.

4.48. The Street Design Guide methodology 2 uses census car ownership data to calculate parking demand in residential development. This is therefore up to date and area specific.

4.49. The increasing size of certain cars is noted (although there has also been a recent trend for small cars), however the very large majority still fit within a 2.4x4.8m parking space (Ford Galaxy, for example, is 4.81m x 2.15m including mirrors). It would not be reasonable or land efficient to design car parks around excessively large cars.

### *Park and Ride*

- 4.50. Comments were received on the park and ride section of the SPD which gives a general description of the strategy and characteristics of a successful park and ride scheme. Generally the comments received support and mirror the strategy for park and ride, with a number of specific thoughts on how the sites should operate.
- 4.51. Network Rail felt that rail station parking for park and ride had been missed from the SPD. This was also raised by the Liberal Democrat ward members for Weetwood. This is a valid point and has been addressed.
- 4.52. Negative comments on the viability and security of park and ride sites in Leeds were received from 2 respondees. Given that Leeds City Council has successfully brought into operation a new park and ride site at Elland Road, which has seen steady growth in usage over a year and no security issues, it is not felt that these points are valid.

### *Motorcycle parking*

- 4.53. Responses were received stating that the motorcycle parking references within the SPD did not correspond with current provision and there was not enough support being given to this form of transport.
- 4.54. It is accepted that motorcycle parking across the district and particularly the city centre could and should be improved. The SPD aims to help facilitate that improvement. The wording of the document has been strengthened with regard to parking for powered two wheelers.

### *Cycle parking*

- 4.55. Support was received for the definition of quality short and long stay cycle parking for new developments from Sustrans and Leeds Cycle Campaign.
- 4.56. Leeds Cycle Campaign disagreed with the approach to long stay parking at hotels, believing that provision should be made for guests. While long stay parking for hotels is primarily aimed at staff the ratio of 1 space per 8 bedrooms would actually provide a good provision which should also be available to customers
- 4.57. One response stated the view that the parking guidance was not strong enough and would not provide cycle parking of sufficient quality. Chapter 5 has been amended to include a reference to the use of planning conditions to secure the right quantum and quality of cycle parking.

## *Supporting Measures*

- 4.58. Issues around school parking were raised by Mr G Hall, who called for greater measures around schools as follows:
- to submit a detailed travel plan which encourages the use of car share and/or use of School “Mini Bus transport for the use of staff – Reason - to reduce private car dependency and onsite parking space.
  - Only “Permit” parking shall be allowed within the School Grounds – Reason - to prevent unauthorised parking.
  - On street parking, either long term or drop off, will be discouraged within a 200 metre radius of School Grounds by imposing traffic regulation orders; Reason - in the interest of child and pedestrian safety.
- 4.59. Current policies, such as the travel plan SPD, are felt to cover these items and amendments have been made in the text of the Parking SPD to make this clearer.
- 4.60. Wording has been added which addresses the issue of drop off provision for school sites.
- 4.61. Comments were received that disputed the value of promoting car sharing and car clubs. It is acknowledged that car sharing is not the sole solution to promoting sustainable travel, but is an important tool that will work for some individuals and particularly larger organisations. Evidence from car clubs suggests that membership leads to reduced annual car driver mileage, reduced carbon emissions due to the newer car fleet and higher levels of usage of sustainable modes of travel amongst members.<sup>1</sup>
- 4.62. Although not a primary part of the SPD, Residents permit parking was raised by several city councillors, Mrs M Thompson and the Little Woodhouse Community Association.
- 4.63. It was felt that permits should not be charged for by the Council and short stay parking should be allowed. Councillors gave a range of responses from wanting more control through to reducing the number of permit areas. It was not felt that permits were a positive solution to the overspill parking issues created by a lack of parking. Administration issues were also raised.
- 4.64. The SPD seeks to ensure that the underlying reasons for these overspill parking problems are not repeated in new development. The creation of permit parking areas is undertaken by the traffic management section and is bespoke to the area in question and can include short stay parking if appropriate.
- 4.65. The administration of permits is undertaken by parking services and follows an established procedure for guest permits etc. The SPD does not cover this area of parking.

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<sup>1</sup> Carplus Annual Survey of Car Clubs 2014/15 – produced by SDG

- 4.66. The introduction of a workplace parking levy was called for by Sustrans. There is no current expectation or aspiration within the Leeds transport vision that a workplace parking levy will be introduced in Leeds. However, the SPD does not rule this out as a longer term measure.
- 4.67. A query was made as to the evidence relating to the 1:10 ratio recommended for electric vehicle parking. This ratio was based on a historic forecast for take up of electric vehicles and although take up has been slower than expected, given the challenges with air quality it is considered that it is nevertheless important to maintain this ambitious approach.
- 4.68. The proposed green parking scheme was supported by the Chamber of Commerce and more details on its operation have been added as a result.

#### *Technical changes*

- 4.69. The consultation process also revealed some technical or wording issues which have been corrected. The key changes being:
- Parking requirements changed for medical services use class to allow for patient parking.
  - Increased expected parking provision at schools to a rate of 1:1 based on full time equivalent (FTE) staff.
  - Removal of business park standards from car parking guidelines.
  - More relaxed standards for HMOs converting to other residential units.
  - Amendments to the cycle parking standards for higher/further education establishment, reflecting the needs of students.

## 5. Conclusions

- 5.1. This report has described the process of public consultation carried out in order for the views of interested parties to be taken on board when shaping the SPD.
- 5.2. A reasonable number of contributions were received, considering the generally technical nature of the content.
- 5.3. Much of the points raised have been taken on board and shaped the final version of the document. Generally there has not been a shift in the guidance described by the SPD, however details have been altered as well as additional description on certain points.
- 5.4. It is considered that the consultation exercise has been a success, allowing a range of stakeholders to influence the future policy of Leeds City Council with regard to parking.