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Dear Sir / Madam,

## **Parking Standards SPD**

The following comments are provided upon the draft Parking Standards SPD.

The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members including a large proportion of the new affordable housing stock.

Our principal concern with the SPD relates to the imposition of the proposed parking standards upon residential development and the effect this will have upon viability, density and the deliverability of sites.

### **General Comments**

The need for the SPD is queried, following discussions with a number of our members the HBF is unaware of any specific issues being raised by the Council, purchasers or housing associations relating to the size or number of parking spaces provided on existing developments. Given this lack of concern the rationale for the imposed increase in the number and size of parking spaces and garages is unclear.

The Council is also reminded that the purpose of an SPD is to assist developers in making successful planning applications. The NPPF (paragraph 153) clearly indicates that SPDs 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 SPD appears to go further than its remit by requiring rigid standards which go beyond the policy requirements. Specific issues are discussed in greater detail against the relevant sections below. Placing additional requirements upon development will inevitably increase the financial burdens upon the development. The implications of the SPD requirements upon viability do not appear to have been tested. The HBF therefore has significant concerns with the SPD as currently drafted.

### **Policy Framework**

Paragraph 2.2 of the SPD correctly refers to the paragraph 39 of the NPPF and the need to consider the written Ministerial Statement dated 25th March 2015 (hereafter referred to as the WMS). The following text from the WMS needs to be read alongside the NPPF:

*“Local Planning 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.”*

In response to this the SPD (paragraph 2.3) suggests that the levels of congestion on key corridors and increasingly poor air quality provide the compelling evidence necessary for the standards. The SPD fails to indicate how providing larger and more parking spaces on new developments will assist in addressing either air quality or congestion on key routes. Furthermore the air quality issues in paragraph 2.3 only relate to Chester, Ellesmere Port and Frodsham. Thus suggesting that the Council does not have any evidence for the introduction of the standards elsewhere in Cheshire West and Chester.

In terms of local plan policies Policy STRAT 10 of the adopted Local Plan (Part One) is noted. This policy identifies that the relevant Council parking standards should be applied taking account of a number of factors. These factors provide flexibility to the interpretation of the standards. This flexibility in application is not discussed within the SPD which takes a rigid approach to the application of standards. To ensure conformity with the policy this should be addressed.

It should also be noted that the Local Plan (Part One) and Policy STRAT 10 were adopted prior to the WMS and as such whilst the Inspector of the plan considered the policy this was not done so with regard to the statement, particularly the need for a clear and compelling justification. The justification for the rigid requirements set out within the SPD is therefore questioned.

A number of other saved policies from previous development plan documents are also referred to. Whilst these may provide context their usefulness is considered limited due to the adoption of the Local Plan (Part One) and the fact they pre-date current national policy on this issue.

### **Car Parking Standards for new houses and flats**

Table 3.2 sets out minimum parking standards for new houses and flats. The evidence for the minimum requirements is unclear and appears contrary to the WMS which states that;

*“...The market is best placed to decide if additional parking spaces should be provided...”*

There also does not appear to be any consideration of the effects the imposition of this blanket requirement may have upon the density of development, particularly considering other space requirements such as open space provision, or the effect upon development viability. This is considered a failing of the SPD.

Furthermore there is no consideration of the availability of other modes of transport and the requirement for spaces. Neighbouring Cheshire East have a variable standard for the number of required spaces based upon this issue.

### **Electric Vehicle Charging Points**

Paragraph 3.15 indicates that it is expected that new developments should incorporate electric vehicle charging infrastructure for any new parking provision (including garages and driveways) which forms part of proposals for new-build or changes of use to housing (including flats). This is a far more onerous requirement than suggested by Policy STRAT 10 and is not justified by evidence upon viability or feasibility. Furthermore the NPPF does not make such stringent requirements, paragraph 35 is clear this is only where practical and by no means seeks this to be a requirement for every residential property and parking space.

## **Departures from Standards**

Whilst the inclusion of this section is generally supported there is no discussion of viability or the characteristics of individual sites.

## **Design Requirements**

The SPD places rigid and potentially onerous requirements upon developers with regards to the dimensions of parking spaces. The identified sizes are larger than required by other authorities, including neighbouring Cheshire East. The justification for Cheshire West and Chester having larger standards is unknown. It is, however, clear that no consideration of the impact of these requirements upon development viability has been undertaken. The rigid requirements are considered unjustified.

## **Information**

I trust the Council will find the foregoing comments useful as it considers amendments to the SPD. The HBF is keen to continue working with the Council and as such would be open to further discussions with regards these comments if considered appropriate.

Yours sincerely,

*MJ Good*

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