22 January 2009



Mr R Wooldridge Harrison Pitt Architects Limited Victoria Court Penny Street Lancaster

Dear Richard

LA1 1XN

Knowlys Quarter, Heysham Planning Application – 08/01433/FUL

I refer to our recent discussions regarding the above, in particular those relating to car parking issues raised in Mr Rivet's email of 20 January 2009.

I have considered that email and also comments of Lancashire County Council's Highways Manager (letter dated 8 April 2008 [sic]) that has prompted the comments made.

I am a little surprised at the comments as I think that it is recognised that the application site represents a sustainable and accessible location for housing. Furthermore, the thrust of planning policy for car parking, at all levels, is that parking provision should, where possible and appropriate, be reduced. The basis for that policy approach is contained in PPG 13 – Transport. Paragraph 49 of PPG 13 recognises the following:

- the availability of car parking has a major influence on the means of transport people choose for their journeys;
- car parking takes up a large amount of space in development and reduces densities;
- reducing car parking in new development is essential, as part of a package of planning and transport resources, to promote sustainable travel choices.

Paragraph 51 of PPG 13 goes on to state that local authorities should:

not require developers to provide more spaces than they themselves wish, other than in exceptional
circumstances which might include for example where there are significant implications for road safety
which cannot be resolved through the introduction or enforcement of on-street parking controls.

I am not aware that any such exceptional circumstances or significant road safety implications arise in this case. I would suggest that a reduced car parking level as proposed is wholly in line with the thrust of national planning policy.

National planning policy is, of course, reflected at a more local level through various policy documents including supplementary planning documents. I am assuming that the County Council utilise the following documents:

- Joint Lancashire Structure Plan Parking Standards
- SPG Parking and Access (Adopted March 2005)

Ref: AJS/PJM/1448-20/RW

The introduction to the Parking Standards document states clearly that:

"Levels of car parking are set out as the maximum that may be allowed, rather than minimum levels that must be provided."

The standard to be applied to 2 bedroom apartments would be 150% (i.e. 1.5 spaces per unit). That is the baseline/maximum figure which may be allowed. I note, with some surprise, that the County Council see that level as being desirable. I take the view that a level below the baseline/maximum would be desirable.

In terms of the "Parking and Access" SPG, the County Council's assessment of the sites accessibility level has the site in the middle of the "Medium" level. Paragraph 1.3 of the SPG indicates that "Where a site is shown to have a medium or high accessibility the maximum level of parking allowed should be reduced." In that context it must surely be the case that a reduced level (rather than the absolute maximum) is desirable. The County Council's reference to "minimum provision" is simply not supported by the SPG or any other relevant planning policy.

Given that the County Council is seeking a developer contribution towards the public transport provision in the locality, it seems ironic that they seem to suggest a level of car parking provision which will be counter productive in influencing people's likelihood of using public transport. If one considers both national planning policy and the local SPG it is clear that the proposed level of car parking satisfies the standards applicable — in our view the proposal would fall foul of the local car parking standard if the level of car parking provision exceeded the maximum standard of 150%.

This is not an exceptional site where there are significant implications for road safety. We are firmly of the view that the proposed level of car parking is acceptable and desirable. Resistance to the proposal on the basis of under provision of car parking would, in our view, be contrary to relevant policy and would be unreasonable.

I hope these comments are helpful to you and the local planning authority.

Yours sincerely

Alastair J Skelton

cc Mr A Gott

Email: alastairs@abbott-associates.co.uk

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