

Notes on Residential Parking Provision in the Forge Washery Development

These notes explain why the appropriate parking provision for 3-bedroom dwellings in the proposed Forge Washery development is 2, not 3, on-plot spaces, with on-street provision to be available in those instances where additional spaces are needed.

DEVELOPMENT OBJECTIVE

From the outset the objective of this proposal has been to create a relatively low-density, landscaped residential development that complements its attractive environmental setting, expands the range of housing options in the Brynamman district, and contributes to economic revitalisation. To this end, it is proposed that most of the dwellings should be 3-bedroom.

POLICY CONTEXT

The regulatory framework governing the provision of parking spaces in NPTC residential developments is embodied in the following documents:

- Planning Policy Wales Edition 11 (PPW 2021)
- 2007 *Planning Policy Wales Technical Advisory Note 18: Transport* (TAN 18)
- NPTCBC Local Development Plan (LDP) adopted In January 2016
- NPTCBC Supplementary Planning Guidance for Parking Standards (SPG 2016) (adopted in October 2016)

The Welsh Government's land use planning policies are set out in PPW 2021. This provides the policy framework for the effective preparation of LDPs.

PPW 2021 is supplemented by TAN 18 (amongst other technical advisory notes).

SPG 2016 was based (with only minor amendments) on the County Surveyors Society *Wales Parking Standards 2014* (CSS 2014), which has been adopted by all or most local authorities to replace the previous standards used by NPTCBC and others – the South Wales Parking Guidelines (Revised) Edition 1993 (SWPG 1993).

ISSUES ARISING FROM THE REGULATORY FRAMEWORK

PPW 2021 advises that:

"Car parking provision is a major influence on how people choose to travel and the pattern of development. Where and how cars are parked can in turn be a major factor in the quality of a place." (para 4.1.49)

And

"Planning authorities must support schemes which keep parking levels down,..." (para 4.1.50)

And

“Planning authorities must require good standards of car parking design, which do not allow vehicles to dominate the street...” (para 4.1.51)

And

“Parking standards should be applied flexibly and allow for the provision of lower levels of parking and the creation of high quality places.” (para 4.1.52)

The LDP states that there should be:

“appropriate parking provision” ... “focusing in particular on meeting the needs of residents” (Policy SP 20, para 5.4.5).

There is no cross-referencing to other LDP policies and how transport policies and requirements might impact the achievement of those policies. Notably, **LDP Policy BE 1: Design** provides that:

“All development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places.”

Two of its key criteria for assessing a development proposal are that:

1. **It complements and enhances the character and appearance of the site**, building or area in terms of siting, appearance, scale, height, massing and elevation treatment; and
2. **It respects the context of the site and its place within the local landscape.**

The importance of those considerations was emphasised in the first of two appeals relating to NPTC’s determination of the Forge Washery proposal.

TAN 18 includes the following advice (para 5.13)

“The location of both on- and off-street car parking spaces will be critical to the design quality of streets ... The following key principles need to be followed when considering the design and location of car parking:

- The important role of the street in creating a liveable neighbourhood;
- There is no single best solution; a combination of on-plot, off-plot and on-street will often be appropriate;
- The street can provide a very good car park ... On-street parking is efficient, understandable and can increase vitality and reduce speeds.”

By contrast, SPG 2016 states that in areas such as Brynamman a key factor is that: “There is no shortage of land for parking provision” and indicates an intention to:

“ensure that new development or a change of use is accompanied by sufficient parking space for private cars and service vehicles to avoid the need for vehicles to park on-street and thereby cause congestion, danger and visual intrusion” (para 3.1.9).

Clearly, pursuing this objective is likely to cut across the key principles set out in TAN 18.

By adopting CSS 2014 NPTC apparently seeks to promote off-street parking in residential areas by requiring 1 space per bedroom to a maximum of 3 (presumably meaning regardless of the number of bedrooms). This has actually **increased** some residential parking requirements as compared to the previous SWPG 1993 standards as follows:

	SWPG 1993	SPG 2016
Size of Dwelling	Spaces Required	Spaces Required
One Bedroom	1.0	1.0
Two Bedroom (floor area <75 m ²)	1.5	2.0
Two Bedroom (floor area >75 m ²)*	2.0	2.0
Three Bedroom (floor area <120 m ²)	2.0	3.0
Three Bedroom (floor area >120 m ²)*	3.0	3.0
Four Bedroom (or more)	3.0	3.0

*SPG did not explain why simply having greater floorspace for the same number of bedrooms warrants more parking.

SPG 2016 adopted the increased residential requirements as a **uniform blanket standard**. It offers no explanation or evidence for doing so, despite noting that in some other instances it had made “minor modifications to the CSS 2014 Standards to suit the requirements of NPTC for the purpose of this SPG” (para 1.02). Where is the evidence that most households with 3 bedrooms have 3 cars? In many cases 1 or 2 bedrooms will be occupied by children, or at least 1 bedroom will be used as a study or den. Why is it acceptable for 4- or 5-bedroom houses to have ‘only’ 3 spaces?

In summary, the SPG 2016 residential parking standards are difficult if not impossible to reconcile with the policies, requirements and/or advice of PPW 2021, TAN 18 and NPTC’s own LDP.

1. In previous PPW editions, there was general advice that: “Local authorities should ensure that **new developments provide lower levels of parking** than have generally been achieved in the past. Minimum parking standards are no longer appropriate”.
2. TAN 18 states that: ‘Maximum parking standards should not be applied so rigidly that they become minimum standards. Maximum standards should allow developers the discretion to reduce parking levels (para 4.13).
3. TAN 18 notes that “the street can provide a very good car park ... On-street parking is efficient, understandable and can increase vitality and reduce speeds”.
4. The LDP states that a development should “respect the context of the site and its place within the local landscape”. Turning the front gardens of every dwelling in the site (which is a low density development on the very edge of the settlement area, adjacent to a protected riverine environment and less than one mile from the Brecon Beacons National Park) into a three space car park singularly fails this test.
5. The LDP states that “appropriate parking provision ...(will) focus on meeting the needs of the residents”. As NPTC has already imposed a requirement for the roadway to be 5.5 metres wide in order to accommodate on-street parking (a policy it promoted strongly in the second appeal against its determination of the Forge Washery proposal), there should clearly be no “need” for residents to completely dedicate their front gardens to car parking spaces.

We further note that in any conflict between the various regulatory documents, the LDP is the controlling text. This is recognised in the SPG 2016 itself which explains that:

“While only policies in the LDP (Local Development Plan) have special status in the determination of planning applications, the SPG will be taken into account as a material consideration in the decision- making process.” (Note to Reader p.1).

This refers to the strictures of the Planning and Compulsory Purchase Act 2004, where ‘special status’ means:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

It is clear, therefore, that LDP Policies (and therefore TAN 18 and WWP 2016) have a greater weighting in the determination of planning applications than does the SPG.

AN APPROPRIATE REQUIREMENT FOR FORGE WASHERY

The proponents of the Forge Washery development wish to create a distinctive, quiet residential precinct with a ‘semi-rural’ character. Traffic volumes are not an issue as there will be only 30-35 dwellings and the internal street system is a cul-de-sac. The key to a successful design outcome will be to ensure a sense of space and calm enhanced by extensive landscaped areas and tree planting.

Most of the dwellings will have 3 bedrooms. Applying the SPG 2016 standard of 3 parking spaces would not only require almost the whole of the street frontage to be allocated for parking, but also the majority of the footpath would be occupied by driveways. This would greatly limit opportunities for on-street parking, planting of street trees and landscaping of owners’ front gardens. Rather than the desired ‘semi-rural’ character, it would create a streetscape of houses in a car park.

As mentioned previously, NPTC has already imposed a requirement for the roadway to be 5.5 metres wide in order to accommodate on-street parking. This requirement becomes meaningless if there are insufficient gaps between driveways.

Also as noted earlier, the relevant statutory policy in the LDP is simply that there should be ‘appropriate parking provision’. The LDP also seeks to facilitate ‘high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places.’ A balance has to be struck that achieves both objectives and is consistent with national policy guidance (which the current requirement for 3-bedroom dwellings evidently contradicts). SPG 2016 does in fact accept that in certain circumstances ‘environmental conditions’ may warrant modifications of the standards (para 3.2.8). In the case of Forge Washery, an attractive riverside location on the urban fringe with the potential for an exceptional development, it makes no sense to apply a questionable parking standard that could ruin the residential environment to take precedence.

Given the clear conflict with PPW 2021, TAN 18 and relevant LDP policies, a requirement for the Forge Washery design to incorporate the SPG 2016 parking standard of three spaces per 3-bedroom dwelling is unacceptable and cannot be supported.

SPG 2016 acknowledges that "the scale of parking provision varies throughout Wales and local priorities will dictate the manner in which the standards are used. Interpretation and application of the standards rests with the Local Authority, but flexibility in the standards allows local circumstances to be taken into account (para 3.2.1)".

We urge and expect NPTC to apply that flexibility.