



Review of Parking Requirements

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Prepared by the Steering Group and
supported by Squires Planning

1. Introduction

- 1.1. This paper has been produced by Squires Planning for Worth Parish Council. It accompanies the Copthorne Neighbourhood Plan (hereafter referred to as the CNP) at Submission.
- 1.2. The CNP Plan Area covers Copthorne and Worth Ward (hereafter referred to as the 'Plan Area') of Worth Parish. The Plan Area was formally designated by Mid Sussex District Council in July 2012 and the Plan covers the period 2020 – 2031.
- 1.3. Copthorne is situated in Mid Sussex District. The village lies 3 miles east of Crawley, 4 miles west of East Grinstead and 4 miles to the south east of Gatwick Airport. The built up area of the village is at the most northerly part of the ward. The areas to the south of the built up area are mainly woodland and farmland.
- 1.4. To provide an up-to-date evidence base for the CNP a parish wide survey was undertaken between July and August 2019 asking various questions covering a range of issues in the Plan Area. A copy of the survey is included within the submitted Consultation statement. It is noted that there are 1988 properties within the Plan Area, and therefore this is the number that will be used for the basis of any calculations in this report.
- 1.5. Part of the survey related to vehicles and parking and this paper summarises those results and sets out the justification for policy CNP16 Car Parking.

2. Policy context

- 2.1. As the CNP sets a local parking standard for residential and non-residential development, it should take into account the following as set out in paragraph 105 of the National Planning Policy Framework (NPPF):
 - a) the accessibility of the development;
 - b) the type, mix and use of development;
 - c) the availability of and opportunities for public transport;
 - d) local car ownership levels; and
 - e) the need to ensure an adequate provision of spaces for charging plug-in and
 - f) other ultra-low emission vehicles.
- 2.2. Mid Sussex District Plan (MSDP) Policy DP21: Transport sets out the objectives for the district with regard to transport. This includes:
 - A high quality transport network that promotes a competitive and prosperous economy;
 - A resilient transport network that complements the built and natural environment whilst reducing carbon emissions over time;
 - Access to services, employment and housing; and
 - A transport network that feels, and is, safer and healthier to use.

2.3. A number of considerations are listed within the policy by which decisions will take account of, including that:

“The scheme provides adequate car parking for the proposed development taking into account the accessibility of the development, the type, mix and use of the development and the availability and opportunities for public transport; and with the relevant Neighbourhood Plan where applicable”.

2.4. The policy goes on to set a requirement on Neighbourhood Plans that propose setting a local parking standard:

“Neighbourhood Plans can set local standards for car parking provision provided that it is based upon evidence that provides clear and compelling justification for doing so.”

2.5. The WSCC Parking Guidance (Sept 2020) states that the ambition for the County Council is to:

“Ensure sufficient parking is provided to meet the needs of the development while maintaining highway network operations, protecting surrounding communities and pursuing opportunities to encourage use of sustainable modes of transport.”

2.6. The principles set out in this guidance include allowing parking provision that is sufficient to accommodate parking demand while exploiting the potential for sustainable travel, minimising adverse effects on road safety, and avoiding increased on-street parking demand

2.7. Paragraph 8(2) of Schedule 4B to the 1990 Act as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004 requires that Neighbourhood Plans meet certain conditions. These include:

- having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order
- the making of the order contributes to the achievement of sustainable development
- the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- the making of the order does not breach, and is otherwise compatible with, EU obligations.

2.8. This paper therefore sets out the evidence supporting Policy CNP16 and the reasoned justification for setting a local standard.

3. Analysis of survey results

3.1. The 2019 Copthorne Village Survey included the following questions related to parking:

Question 4

- a) How many useable garages and other off-road parking spaces does your home have?
- b) Would your off-road parking spaces be able to facilitate the charging of an electric vehicle? (yes/no/unsure)
- c) Does your household routinely park a vehicle on the street? (If yes, how many?/No)

Question 13

- a) How many vehicles does your household have?
- b) Over the next 5 years do you expect the number of cars, etc owned by your household to increase? (yes/no)
- c) When you replace your petrol or diesel powered vehicles will it be with an electric vehicle? (yes/no/unsure)

Question 15

- a) How do members of your household travel to work? If they travel by train, please also include how they travel to the station.
- b) Has your household average travel to work time changed over the last 4 years?

Question 22

Do you have any comments on this survey, on issues not raised in the question, or neighbourhood planning generally?

3.2. There was a total of 577 responses to Q13 a) which asked, *how many vehicles does your household have?* This is 30% of the households within the Plan Area representing a sound basis for analysis. The breakdown is as follows:

Vehicle type	No of vehicles	Households
Petrol/Diesel car	1062	569
Petrol/diesel van	60	56
Petrol/diesel motorcycle	124	59
Hybrid car	25	24
Hybrid van	3	2
Hybrid motorcycle/cycle	0	0
Electric car	1	1
Electric van	0	0
Electric motorcycle/cycle	3	2

- 3.3. Cumulatively these households have 1278 vehicles. This is an average of 2.2 vehicles per household. Excluding motorcycles, the average is 2 cars/vans per household. 93% of households who responded to the survey own a private vehicle of any type. This is significantly higher than the UK average which is 78%¹.
- 3.4. National Travel Survey² results show that in 2018/19 the average car/van ownership per household in England was 1.21, in the South east was 1.41, and in the Rural Village, Hamlet and Isolated Dwelling Classification the average was 1.78. This shows that vehicle ownership in the Plan Area is well above the average for the region and materially higher than the average for similar types of rural area.
- 3.5. Of those that responded to Question 13b) 68 households expect the number of vehicles in their household to increase in the next 5 years. Whilst there is no data on which households are planning to reduce the number of vehicles, this data does show that it is likely that the number of vehicles will increase in the Plan Area related to the existing car ownership of existing households. This will put additional pressure on the existing capacity for on and off-street parking in the Plan Area.
- 3.6. Question 4 of the survey asked, “*how many useable garage spaces and off road spaces does your home have?*” When considering parking, 582 households have garages or off-road parking which provide 1666 spaces. 122 (21%) of these households however have more cars/vans than their off-road parking can accommodate. These 122 houses have off-road parking space for 144 cars/vans yet have 310 vehicles between them meaning a shortfall of 166 spaces.
- 3.7. Alongside this, the response to Question 4c) shows that 133 households routinely park a total of 173 vehicles on the street. This is interesting as it demonstrates that some people may park on the street despite them having off-road parking available. But considering the number of responses this is a smaller number than we may have expected given the known parking issues in the area.
- 3.8. If one were to extrapolate these findings by assuming 21% of all properties cannot meet their own parking need off-road we would establish that Copthorne is short of circa 600 parking spaces.
- 3.9. Question 15a) asked “*How do members of your household travel to work?*”

Method of transport	No who travel by this method	% who travels by this method	Time spent for each method (minutes)				
			0-30	31-60	61-90	91-120	120+
Bus	32	4.6%	22	8	1	1	0
Train	70	10%	16	39	9	3	3
Car/van	553	79.2%	388	115	31	8	11
Motorcycle	7	1%	4	2	1	0	0
Cycle	7	1%	5	1	1	0	0
Walk	29	4.2%	28	0	1	0	0

¹ [Percentage of households with cars by income group, tenure and household composition: Table A47, ONS \(2018\)](#)

² [National Travel Survey, Table NTS9902, Household car ownership by region and Rural-Urban Classification: England 2002/03 and 2018/19. DfT \(2018\)](#)

- 3.10. 14.6% of respondents travel to work by public transport (bus and train). This compares to 16.9% in England³. This may be indicative of Copthorne's location on J10 of the M23, which provides good connectivity North and South. It also indicates that Copthorne is primarily a commuter settlement with people travelling outside the area for work.
- 3.11. The data in Appendix 1 is from the village survey and compares the number of bedrooms at a property alongside the number of cars or vans owned by people in that property. It shows that there are three 3-bedroom properties that have 5 cars, two 4-bedroom properties with 5 cars, a 5-bedroom property with 5 cars and a 5-bedroom property with 6 cars. There are also two 6-bedroom properties with 5 and 6 cars respectively.
- 3.12. A copy of this note was sent to MSDC for comment. The response included a table which uses the data in Appendix 1 to show the average number of cars owned for different sized properties against the WSCC parking space standards:

Number of bedrooms	Number of cars	Number of responses	Percentage of response	Average number of cars	WSCC space standard
4+	0	7	3%	2.2	2.7
	1	47	18%		
	2	120	45%		
	3	56	21%		
	4	28	11%		
	5	4	2%		
	6	2	1%		
3	0	20	7%	1.6	2.1
	1	92	34%		
	2	127	47%		
	3	26	10%		
	4	4	1%		
	5	3	1%		
2	0	4	6%	1.3	1.7
	1	41	59%		
	2	19	28%		
	3	5	7%		
1	0	2	50%	0.5	1.4
	1	2	50%		

- 3.13. The above table shows that the average number of cars owned per household is under the WSCC standard for the number of spaces required for that size of house. MSDC have indicated that from their analysis of the data different parking standards (from WSCC's) are not justified as the number of vehicles owned is lower than the WSCC spaces standard.
- 3.14. However, the data above does not properly take into account local variances. As shown from the Q4 results a large number properties have a greater number of vehicles than off street spaces leading to overspill to on street and parking problems. It appears that the existing housing stock does not meet the WSCC standard for number of parking spaces which is

³ [QS701EW - Method of travel to work, 2011 Census](#)

causing on street parking problems which are a particular issue within the plan area. We believe this trend is likely to continue which would further exacerbate on street parking issues. Other factors such as spaces that are not used, garages which are used for storage, tandem spaces where only one space is used, and other cars parked on street for convenience all also indicate that the current WSCC standard is inadequate for the needs of Copthorne.

Conclusion

- 3.15. The survey results show that, to avoid a worsening of parking problems in Copthorne, loss of off-street spaces within the existing housing stock should be resisted.
- 3.16. Data from the National Travel Survey and Copthorne village Survey show that reliance on the private vehicle in this area justifies a slightly higher parking standard for new developments than the WSCC standard alongside policies that encourage improvements to public transport.

Reasoned Justification and proposed policy

- 3.17. The results of the Copthorne Village survey and analysis above demonstrate that there is high reliance on the private car within the Plan Area, higher than the average in England, the region and for similar village/rural areas. This level of car ownership demonstrates that, amongst other factors, the current public transport offer is not an incentive enough for households to reduce the number of private vehicles that they own.
- 3.18. The Plan Area is characterised as a rural area with limited public transport options and where residents need a vehicle to provide suitable access to services, social and recreational pursuits, and to commute to a wide area for work. Availability of parking spaces at home is unlikely to feature highly in the decision to own a vehicle in such areas as it is seen as a necessity. Many new and existing residential areas suffer from inadequate and uncontrolled parking, which can hinder bus and emergency vehicles, undermine traffic and pedestrian safety, lead to neighbour disputes and generally reduce the quality of life. It is therefore clear that current parking standards for the area are not meeting the objectives of national and local policy as set out in Section 2.
- 3.19. There has long been a drive to decrease reliance on motor vehicles and encourage public transport. This included the policy approach of introducing maximum parking standards in the 2000's. The approach of maximum parking standards was to promote the use of more sustainable transport choices by limiting the availability of parking. However, in practice this did not prove successful when applied outside cities and town centres, having little impact on car ownership and causing a number of issues as set out above.
- 3.20. The current policy approach as set out in the NPPF guidance is to discourage maximum parking standards. The approach encouraged in the NPPF (and MSDP Policy DP21) is to decrease reliance on motor vehicles by actively managing patterns of growth so that they are in sustainable locations and encourage sustainable modes of transport. The guidance/policy allows the setting of local standards that reflect the local circumstances such as accessibility, availability of public transport, and local car ownership levels.
- 3.21. The results of the 2019 Copthorne Village Survey in relation to these considerations can be summarised as follows:

- There is a high level of car ownership within the plan area, with a limited number of spaces to accommodate the existing number of vehicles. This is causing a number of issues in relation to safety, amenity and general quality of life in the Plan Area that new development should not exacerbate.
- To avoid a worsening of parking problems in Copthorne, loss of off-street spaces within the existing housing stock should be resisted.
- The percentage of those who travel to work by public transport is low. 10% of respondents travel to work by train, however the plan area does not have a train station. This suggests that many of those who use public transport are still reliant on the car to get to the train station. It is clear that accessibility to public transport in the plan area is poor. There is limited availability of public transport within the plan area that residents can access without the need for a car to undertake part of the journey.

3.22. The evidence demonstrates that the local circumstances, with poor public transport accessibility, high reliance on the private car and limited off street spaces for many properties justify a local standard being introduced to address the likelihood that the current issues will be exacerbated under the current policy framework.

3.23. The CNP therefore proposes a slightly higher parking standard for residential dwellings than the current WSCC standard to be applied to new dwellings and existing dwellings where off street provision is impacted. This reflects the local circumstances as evidenced in the previous sections. This level of detail was not available to WSCC, where the standard is based on levels of car ownership over a wider area and without the level of detail collected through the Copthorne Village Survey. The proposed policy is as follows:

CNP16 Car Parking

CNP16.1: Developments within the defined Built up Area Boundary⁴ which propose to remove off-road parking spaces on a site will only be permitted where alternative provision is made in accordance with CNP16.3.

CNP16.2: Where an existing parking space within a garage will be lost (for example by its conversion to habitable rooms or demolition) parking provision must be made in accordance with CNP16.3

CNP16.3: New development must include the quantum of off-street car parking in accordance with the greater of:

- a. The latest WSCC guidance at the time the application is submitted. OR*
- b. For residential development, one on-plot / off-street car parking space per bedroom except a 1-bed dwelling which shall have a minimum of two parking spaces.*

3.24. For comparison, the following table sets out the current WSCC parking standards for the Plan Area and application of the standards as proposed in the CNP.

Number of Bedrooms	Number of Habitable Rooms	WSCC standard	CNP16.3 standard
1	1 to 3	1.4	2

⁴ The built up area boundary is defined by Mid Sussex District Council and set out in the adopted development plan. At the time of writing the relevant document is the [Mid Sussex District Plan 2014-2031](#).

2	4	1.7	2
3	5 to 6	2.1	3
4+	7 or more	2.7	4

- 3.25. The highest minimum standard is set at 4 spaces for dwellings with 4 or more bedrooms. This has been determined through analysis of the data which clearly shows that it is rare for properties to have more than 4 cars/vans in a household, this is illustrated in Appendix 1.
- 3.26. In conclusion, the proposed policy, which requires a slightly higher number of spaces per dwelling than the existing WSCC guidance, will address the specific parking needs of new dwellings within the Plan Area and seek to avoid exacerbating the issues within the existing housing stock. This is alongside policy CNP15: Sustainable Transport, which, in line with the NPPF and MSDP seeks to promote sustainable transport. The proposed policy is therefore in general conformity with the development plan.
- 3.27. It should also be noted that on occasion, provision of a greater or lower number of spaces than defined in these standards may be acceptable. Such applications should, however, fully justify the level of parking provision proposed.
- 3.28. It is recommended that this policy is monitored, and a future review of the neighbourhood plan includes a reassessment taking into account the impact of the policy and a review of the accessibility, availability of public transport and local car ownership levels at that time.

Appendix 1 – Bedroom v Vehicles Analysis

The table below shows the data from the village survey and compares the number of bedrooms at a property alongside the number of cars or vans owned by people in that property. Properties with 5 or more vehicles are highlighted yellow to illustrate that these are the exception and justify the proposed parking policy not requiring any property to provide more than four spaces.

No of Bedrooms	Vehicles in household
6	2
6	0
6	4
6	6
6	2
6	5
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No of Bedrooms	Vehicles in household
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