Consultation on Policy Options Papers for Brighton & Hove's City Plan

October 2011

Park and Ride Transport Options Paper
1. Introduction

1.1 The overarching spatial strategy for the city is based on accommodating the majority of development within the built-up area in locations with good sustainable transport access. The seven development areas (Lewes Road, London Road, Brighton Centre, Brighton Marina, Eastern Road/Edward Street, Hove Station and Shoreham Harbour) are therefore either located on key transport corridors or in areas with potential for improved access.

1.2 The main priority of the sustainable transport policy has been to create a safer, cleaner and quieter city whilst building more homes, creating more jobs and continuing to attract visitors to the city. This is to be achieved through reducing the need to travel, improving accessibility and improving sustainable transport measures including promoting walking, cycling and use of public transport. Together these measures aim to encourage greater use of sustainable transport, partly through a transfer of journeys away from the car, and therefore address the pressure for increased car movements during the life of the plan.

1.3 This was set out in Policy CP8 in the February 2010 Core Strategy submission (now withdrawn) that also seeks to address the city's relationship with the wider sub-region to ensure the associated increase in travel that results from the spatial strategy can be accommodated sustainably in the city beyond 2026. This approach is integrated into the plan with the development areas and special policy areas. A Transport Assessment (TA), undertaken in 2009 indicated that the strategy would provide effective travel management into and around the city 2026 and the policy was supported also by the Highways Agency, which is responsible for A23 and A27 Trunk Roads.

1.4 Part 3 of the policy sets out the package of measures proposed to promote modal shift. These are:

- **Strategic capital schemes** - two main schemes are outlined, park and ride and the bus-based coastal transport system.
- **Fiscal measures** - this would include car parking charges.
- **Technological improvements** - this would include measures to enable moves to cleaner and more sustainable forms of travel, for example charging points for electric vehicles.

1.5 Park and Ride falls under a strategic capital schemes. The adopted Local Plan has a policy that sets out criteria by which proposals for Park and Ride would be considered. The last version of policy CP8 (in the withdrawn Core Strategy submission) stated a commitment to a strategy of providing three to five park and ride sites in conjunction with measures to manage parking in the city centre.

1.6 A number of studies and reviews of Park and Ride have been carried out in recent years, without any firm conclusions or decisions. It is now considered an appropriate time to review the principle of including Park and Ride as part of the city's spatial strategy for the reasons set out below:

- **New Transport Strategy** - a 15 year strategy was adopted in May 2011 as part of Local Transport Plan 3 [LTP3]. The strategic transport objectives aim to help deliver wider policy goals which include supporting economic growth, reducing carbon emissions, promoting equality and opportunity, contributing to safety, security and health; and improving quality of life.
2.0 Financial Context - in the context of public sector budgets and available finance and the current financial climate it is important to review major projects in terms of value for money, weighing up the benefits individual projects could bring to the city against their impact and cost. Park and ride would be subject to these considerations. The estimated (2004) capital costs of constructing a number of potential sites in Brighton & Hove with up to 1500 spaces ranged from approximately £3 million to £14.5 million. If Park and Ride is progressed, it is important it is taken forward in a way that maximises benefits to the city in terms of reducing car movements, improving the environment and benefiting the economy. Funding would need to be secured and a commercial operation would avoid the need for any public subsidy.

2.1 Political priorities - the priorities of the city council’s new administration are to promote a shift from car use to more sustainable transport. This can be achieved in a number of ways. By improving the network of cycle routes and increasing cycle parking; working closely with bus and rail companies to make public transport more attractive and cost effective, and increasing services to support planned growth such as a rapid transport system; and improving the public realm to make walking a more attractive option. Other priorities include, promoting shared space, creating safer residential areas e.g , introducing 20mph zones, more travel planning and promoting alternatively-fuelled vehicles.

2.2 Objections were raised to the soundness of the proposed park and ride strategy at the Core Strategy publication stage. The Economic Partnership and B&H Bus Company raised concerns that the small sites Park and Ride strategy would not be viable or deliverable. An objection was made by B&H Friends of the Earth raising concerns that Park and Ride will not be effective in reducing car traffic in the city centre unless it is accompanied by the closure of city centre car parking.

2.0 Evidence Base

2.1 2009 Transport Assessment [TA] - The government required a TA as part of the evidence base underpinning the Core Strategy. Its purpose is to assess the transport-related impacts of adopting the proposed spatial strategy for new development and land uses over the life of the plan. The TA was undertaken using the city council’s original transport model and looked at the likely impact of future development on travel movements in the city with and without the proposed spatial strategy, in two future years (2016 and 2026). It also tested a range of different proposed measures (including the Park and Ride strategy) to assess how well they could offset the impact of additional journeys. The principle of Park and Ride was therefore tested as the ‘Level 2’ scenario. The current TA was re-run in 2009 in order to assess the transport impact with and without the then proposed development levels at Shoreham Harbour.

2.2 In summary, the findings indicated that proposals for three to five park and ride sites, would have a minor overall impact on reducing congestion /delay on the city’s road network. The impact would not be significant in 2016 with only a small reduction in congestion by 2026. Park and Ride would be expected to be more effective at reducing congestion levels when accompanied by a like for like reduction in parking provision in the city centre, although the opportunities to do so are limited and also have potentially wider cost and budget implications.
2.3 B&H Park and Ride Site Search Study 2004 - over 100 possible sites were assessed and the study recommended a number of preferred sites for Park and Ride. The two sites that were identified and taken forward were Braypool Playing Fields and Patcham Court Farm. Additional study work was undertaken but no preferred site was agreed.

A further desktop review of sites was undertaken between 2008 and 2010 in to take account of changed circumstances (e.g. designation of the National Park and new council strategies). There were no firm conclusions arising from this work.

2.4 Other background studies - Over a number of years there has been a considerable amount of background research on the effectiveness of Park and Ride. This includes work by the (English) Historic Towns Forum [HTF], the Campaign for the Protection of Rural England [CPRE], and academic research e.g. Dr Graham Parkhurst. More recent research has also been undertaken, such as work in 2009 by both Jacobs Consultants and RPS Consultants.

Conclusions or opinions on the benefits and disbenefits of Park and Ride have been divided in terms of impacts such as abstracting passengers from other public transport services, or generating additional or longer trips by car. However, this is highly dependent on local circumstances and a wide range of different parameters. A general conclusion drawn by RPS is that Park and Ride schemes appear to not be fully delivering expected reductions in traffic and congestion, and that a high proportion of authorities subsidise Park and Ride operations. However, economic benefits are considered to be an indication of success in the form of increased patronage and attracting more visitors.

3. Issue: Should the provision of Park and Ride sites remain a priority for Brighton & Hove?

3.1 In reviewing the approach to delivering Park and Ride as part of the city's spatial strategy, a number of options have been identified for further consideration. These are explained below.

Options

Option 1: Remove Park and Ride from the sustainable transport policy (CP8)

This option also requires alternative measures to mitigate the impact of increased car movements entering the city (especially as a result of planned development). These measures include, working with rail and bus companies to increase patronage for longer distance journeys, improve affordability and better integrate services. A further element would be to increase the use of travel management measures and employment policies e.g. at schools and for employers, to reduce the need to travel and/o or dependence on the car, and to consider fiscal measures to influence travel decisions and manage car use in the city centre (e.g. increases to car park charging).

Advantages

- Developing and delivering a Park and Ride strategy and facilities have significant cost implications - lead to savings.
- Removes challenges to the soundness of the Core Strategy on the grounds that sites for Park and Ride have not been identified and the proposal is not deliverable.
- Alternative measures to mitigate the impact of increased car movements entering the city could build on the use of existing sustainable transport infrastructure and travel behaviour change.
Disadvantages

- Loss of a well-supported and recognised means of intercepting traffic from outside the area that provides greater choice to drivers that would deliver greater benefits if implemented in conjunction with effective management of city centre parking provision, such as a reduction in parking spaces.
- Removal of the future option of increasing the effectiveness of any future proposals for a rapid transport system to serve the city centre.

Option 2: Retain proposal for Park and Ride in the form of a revised criteria-based policy incorporated into the Sustainable Transport policy

This option would remove part 4 of the Sustainable Transport CP8 Policy (relating to Park and Ride) and introduce a new part B to the Sustainable Transport CP8 Policy that will set out the criteria by which Park and Ride facilities will be sought and provided as part of a package of measures to manage car parking in the city centre. The proposed policy is set out below and has been amended in line with recommendations arising from the Sustainability Appraisal.

Draft policy CP8 Sustainable Transport

Part B

Provision will be made for Park and Ride facilities that will form part of a wider package of measures to control and manage parking in the city centre and improve public transport.

In assessing the suitability of sites for Park and Ride, the Local Planning Authority will have regard to issues of viability and deliverability and the following planning considerations and need to be satisfied that:

1. there will be a sequential approach to a site search where it should be demonstrated that existing major car parks in the outer built-up area cannot be secured for Park and Ride use as part of their current or proposed use, followed then by other sites within the outer built-up area before looking beyond the built-up area boundary;
2. there will be safe and easy access to the site from the main road network;
3. sites will be in locations that will support or help extend the existing public transport network;
4. there will be no significant adverse effects on residential amenity and the built and natural environment in the area.
5. sites will be subject to an environmental impact assessment and measures will be taken to ensure that any adverse impacts are minimised to an acceptable level; and
6. Park and Ride locations will not have a significant adverse impact on the South Downs National Park, sites of European Nature Conservation Importance and other national and local designations.
Advantages

- Allows for a future Park and Ride scheme that could also help support a rapid transport system and other measures to intercept traffic and mitigate the impact of car movements in the city centre.
- Provides a positive and flexible approach to providing Park and Ride facilities whilst allowing delivery within the plan period, but at a point when greater opportunities to secure funding could be available.
- Improved soundness as greater weight is given to site assessment criteria which are included in the wording of the policy.
- This approach addresses soundness challenges in terms of viability and therefore deliverability.

Disadvantages

- Possible criticism that a site has not yet been identified in the 20 year strategy for the city.
- Concern that the disadvantages of providing Park and Ride (in terms of cost, impact, and identifying, agreeing and securing appropriate and available sites in the city) outweigh the benefits in terms of reducing car use (reduced congestion, improved air quality and safer streets) in city.

Option 3: No change - retain part 4 of Sustainable Transport policy CP8

Part 4 of the CP8 policy stated:

'Providing three to five Park and ride sites adjacent to key strategic corridors that will be identified in the Development Policies and Site Allocations DPD/Part 2 of the City Wide Plan.' The criteria for assessing future Park and Ride sites are set out in the supporting text of the policy.

Advantages

- There will be reduced localised impact as the small site approach could have less impact on nearby residents and the environment by dispersing traffic movements.
- Having a number of smaller park and ride sites provides more choice and would be a more effective way to intercept traffic on a number of routes into the city.

Disadvantages

- Issues and challenges around viability and deliverability. This approach is more costly in terms of the laying out of facilities and provision of public transport services to each site.
- Difficulties in identifying a number of sites as land in the city is limited and/or highly constrained.
- There has been criticism that the sites have not been identified.
- Insufficient weight given to the site assessment criteria which are set out in the supporting text under this option.
- Concern that the disadvantages of providing Park and Ride (in terms of cost, impact, and identifying, agreeing and securing appropriate and available sites in the city) outweigh the benefits in terms of reducing car use (reduced congestion, improved air quality and safer streets) in city.
4. Sustainability Appraisal of Options

4.1 The overall summary and comparison of options states that overall, Option 1 has more potential for positive impact than negative impact, although some of the impacts are still fairly uncertain. The option now sets out some of the alternative measures to mitigate the impact of increased car movements and these should have positive impacts on improving air quality, reducing car journeys and therefore bring about improvements to health. However, there is some uncertainty on the impact of these measures without a formal assessment.

4.2 By not having Park and Ride, Option 1 has the potential to avoid a range of adverse impacts, particularly site-based adverse impacts such as on biodiversity, the SDNP, the built environment and pollution to water resources. However, not having park and ride could also have a negative impact on employment and the economy.

4.3 The results for options 2 and 3 are fairly similar, both having negative and positive impacts against the same objectives, although Option 3 appears to have more potential for more significant negative impacts against some objectives when compared with Option 2. This is due to the strength of the policy wording associated with Option 2, where the sequential approach and site selection criteria is contained within the policy text and therefore carries more weight. Both options are considered to have the potential to reduce car journeys made in the city and therefore improve air quality and health, based on the findings of the Transport Assessment 2009, although the SA considers that this will take place only if an equivalent number of city centre car parking spaces are removed. The SA also notes that the reduction in congestion index associated with the delivery of Park and Ride is minimal and questions whether the anticipated reduction in traffic achieved is a worthwhile investment when considering the costs of implementing Park and Ride.

4.4 Both Options 2 and 3 have more potential for negative impact than Option 1, particularly against the site-based objectives. In addition, there are concerns over the viability and deliverability of park and ride, both in terms of the cost to implement and sites to be developed. Overall, the SA finds Option 1 to be the preferred option, as this option has more potential for positive or no impact than negative impact and is also the more viable option. The SA recognises that Option 1 may have an indirect negative impact on the economic development and employment objectives and that this can only be fully understood if a study to compare the environmental costs of having Park and Ride to the economic costs of not having Park and Ride is undertaken. The SA also recognises that the potential gains in terms of reduction in car journeys are uncertain and the impact of these measures should be assessed.

5. Preferred Option

5.1 Option 1 to remove Park and Ride from the Sustainable Transport policy is the preferred option. The costs of providing Park and Ride facilities and linked bus services outweigh the benefits derived in terms of reducing traffic and congestion in the city. It is considered that more significant benefits could be achieved at less cost through alternative measures that are more deliverable. These suggested alternatives are outlined in the Options Paper. The findings of the Sustainability Appraisal support this approach.