

**Brighton & Hove Albion
Football Club**

Transport Strategy Review

Final Report

Project Ref: 26449/001

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Executive Summary

This report responds to a brief issued on behalf of the American Express Community Stadium Transport Management Group for an independent assessment of the transport arrangements adopted by the Stadium.

The Stadium opened in July 2011, with Brighton & Hove Albion Football Club setting themselves clear objectives in encouraging sustainable travel for fans attending matches and events. With a new planning Application for the expansion of the capacity of the ground we have reviewed the success to date of the adopted Transport Strategy against the Club's objectives, the Council's policy requirements, best practice elsewhere and the impact on the wider community.

The history of the planning Applications to secure the Stadium is long and complex, having started with the first Application and Transport Assessment submitted in 2001, which established the key objectives of encouraging sustainable travel and discouraging car access. Full planning consent for the Stadium was approved by the Secretary of State on 23rd July 2007.

In late December 2011 the Club submitted a planning Application to increase the capacity of the Stadium from the existing 22,500 to 30,750 and requesting an increase in maximum allowed car parking from 2,200 to 3,000 spaces (the increase in actual parking spaces is estimated to rise by 689 from the current 2,015 to 2,704). This season attendance for Football League Championship games have ranged from 19,108 to 20,968, an average gate of 20,118 and the Club advises us that there is significant demand for additional season tickets. The planning Application was supported by a new Transport Assessment and this has been reviewed by our study team.

To assess whether the Transport Strategy commitments made initially have been met we have reviewed the agreed 2008 Planning Conditions which specifically relate to transport. In summary we can report that almost all of the Conditions have been fully discharged and that the Club is actively working on resolving all outstanding issues, such as secure cycle parking and travel planning. Condition 35, concerning parking locations and numbers, could not be fully discharged because of changes to the status of Falmer High School and therefore practical temporary arrangements at Bennett's Field have successfully been implemented. This continued commitment to deliver the measures from the original Application should give the Council confidence that the Club will be similarly committed to implement further sustainable travel measures with the new Application.

Following a site visit in early January our review of the match day travel and transport operations concludes that it is generally working well on site, through delivering the Transport Management Plan measures and effective stewarding but there are recognised difficulties of on street parking in nearby residential areas and continued pressures on public transport capacity.

Our review of the Club's expansion plans confirms that the seating capacity would increase by 36% and parking by 34%, so that the availability of parking supply per visitor would stay broadly the same. The current ratio of parking is 1 space per 11.16 supporters, the proposed ratio is 1 space per 11.37.

This is at level generally much lower than that found at many new build stadia in England and the use of public transport services and the current spare capacity in existing car parks demonstrates the success of the Club's sustainable travel offer. It builds on the Club's success in securing over 50% sustainable travel mode share when at the Withdean.

The study team reviewed the 2011 Transport Assessment in detail and raised a number of issues for further clarification and resolution. These included:

- Off Site Parking – Surveys are currently being undertaken by the Club and the Council to ascertain the level of on street parking by fans and this will influence the decision whether to

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consult on establishing a CPZ in the North Moulsecoomb and Coldean areas, which is accepted by all as needing resolution

- On Site Parking - The Transport Assessment suggests that while Bennett's Field is to be retained on a temporary basis alongside the Falmer Released Land site until 2014, additional Park & Ride provision is developed and offered as an alternative if required. The pricing strategy is also identified as a tool that should be better utilised to ensure that Club car parks are full and unofficial on street parking made less attractive, recognising that some fans will always seek to drive to matches because of the lack of sustainable alternatives
- Mode Share – The TA reports positively the high levels of mode share of rail and bus, which is recognised as a success. From the TA surveys however on weekdays walking seems to be much higher than predicted, whilst car driver levels are much lower than predicted, which suggests a link with the unofficial parking in nearby residential areas, where these pedestrians are possibly coming from. Enhanced surveys would allow informed consideration of both primary and secondary modes of transport, so that more attractive sustainable travel offers can be developed by the Club and targeted at these car orientated groups
- Demand - With 8,250 additional seats, even with the observed lower than predicted modal split of 16.5% using car parking, the Club would generate 1,361 additional cars. Yet the Club are only seeking an additional 800 spaces over that already agreed, which raises additional concerns regarding off site parking and public transport capacity. As there is existing spare capacity on site at Bennett's Field and the University of Sussex and off site at the Race Course Park and Ride this may be resolved, but more robust analysis of future car park demand and utilisation patterns is required. We understand all "additional" cars have been considered in the TA quantitative traffic assessments for robustness.
- The 2011 Transport Assessment says the existing local service buses can accommodate 1,000 additional supporters and trains an additional 1,500 - 2,500 fans 'if the arrival departure profile is spread out'. Our observations suggest there could be a shortfall in public transport capacity on certain corridors and journeys, even if extended arrival/departure times are achieved. New shuttle bus services from Brighton to the Stadium (or from the Level to the Keep) however should be considered only if additional local bus services can not meet additional demand, because of practical issues of accommodating frequent services at the Keep bus stop.

In summary the prime issue that arises in reviewing the new Transport Assessment is that the Club has to achieve a fine balance between offering more parking on site, while discouraging off site parking, increasing public transport capacity and use, encouraging more park and ride use and influencing travel patterns to spread peak travel. In principle we think that the case for up to 800 additional car parking spaces on site can be made and therefore we support the use of the Falmer Released Land, as part of a package of measures and based on the clubs success to date in encouraging sustainable travel.

The evidence from the Transport Assessment is not clear that the percentage of non car mode trips are likely to be increased with the actions proposed, noting that there are already constraints on rail capacity, for example. If the transport system can not provide the trips by the more sustainable modes which have mass capacity (i.e. primarily public transport) then the Club and Council may have to consider a higher provision of parking on and off site. We believe that this could still be achieved within the maximum of 3,000 better utilised on site parking spaces within 1.5km and if necessary an additional 1,000 Park & Ride spaces to replace Bennett's Field, so as to remain consistent with both the original and revised Conditions.

Our report also identifies a number of outline recommendations, which will need further development in the context of the Council's own detailed review of the Planning Application and Transport Assessment but are offered to encourage debate on the priorities in delivering an improved Stadium Transport Strategy as part of the Club's expansion plan.

1 Introduction

This report responds to a brief issued on behalf of the American Express Community Stadium Transport Management Group for an independent assessment of the transport arrangements adopted by the Stadium. The client group includes Brighton & Hove City Council (the Council) and Brighton & Hove Albion Football Club (the Club).

The Stadium opened in July 2011 and has proved to be a popular new home for the football club. Brighton & Hove Albion Football Club have set themselves clear objectives in sustainability and in particular in encouraging sustainable travel for fans attending matches and events. With a new planning Application for the expansion of the capacity of the ground it is timely to review the success to date of the adopted Transport Strategy against the Club's objectives, the Council's policy requirements, best practice elsewhere and the impact on the wider community.

2 Study Brief

A study brief was issued by the Stadium Transport Management Group in late December 2011. In summary our Terms of Reference are:

To provide an independent analysis of available data and reports to assess the robustness of Club's Transport Strategy and to assist the Council in its consideration of the extra seating planning Application and Released Land planning brief.

In particular the study sought an assessment of how robust the Club's Transport Strategy has been in:

- *encouraging the use of sustainable modes of transport,*
- *discouraging single occupancy car use, and*
- *to consider the need for car parking as a key part of the suite of measures to accommodate the existing and future transport demand.*

The scope will be to review all the currently available data collected by the club, independent survey companies, and all Transport Assessments and reports to provide a Technical Report on the modal split the club has achieved in comparison with other football clubs. The Report will consider the coherent provision of travel options for fans walking or cycling to the ground, using buses or trains and those using their car and recommend ways of improving bus and car flow and lessening the impact of parking in local areas, particularly in Moulsecoomb and Coldean.

The timescale for the study is constrained by the need for our information and report to be presented to the Transport Management Group by 20th January, 2012. This therefore meant that there was insufficient time for additional on site or off site surveys, although the project team were able to visit the Stadium on a match day and review the Club's survey data.

We have therefore focused on analysis of existing data provided by the Council and the Club, including all documents related to the previous and current planning Applications. The relatively short deadline also limited the opportunity to speak to other stakeholders, but we were provided with a range of third party comments by the Council and the Club, plus we undertook our own local research to capture the views of the local community.

In addition to the formal brief the client team asked us to consider the following options in outline:

- the possibility of a shuttle bus from the Level to the Keep;

- improvements to the cycle parking arrangements at the Stadium;
- a review of match day / event day parking in Moulsecoomb & Coldean; and
- review options for managing traffic emerging from a proposed car park on the Falmer Released Land to ensure pedestrian and cyclists are given priority to also exit safely

3 Context

The Amex Community Stadium is located on Village Way, Falmer and is adjacent to the A27 and The Drove (B2123). It is also located south of Falmer Station on the Brighton to Lewes railway line and bordered by both the University of Brighton and University of Sussex campuses. The Stadium was completed and handed over to the Brighton & Hove Albion Football Club in May 2011. It is a 22,500 seat community stadium, primarily used as the home ground of Brighton & Hove Albion Football Club. It also incorporates a banqueting and conference facility, health and well being facility, medical centre, training kitchens, office space, ticket office, club shop and a 200 capacity bar/lounge.

The history of the Planning Applications to secure the Stadium is long and complex, having started with the first Application and Transport Assessment submitted in 2001, which established the key objectives of encouraging sustainable travel and discouraging car access. The Council's consent was given in October 2005, following the submission of the original Application (reference BH2001/02418) to the Council in 2001. The Application was subject to two public inquiries and an unsuccessful legal challenge from Lewes District Council in 2005. Full planning consent for the Brighton & Hove Albion Community Stadium was approved by the Secretary of State on 23rd July 2007.

The Application sought permission for:

A community stadium with accommodation for Class B1 business, educational, conference, club shop merchandise, entertainment and food and road works, pedestrian and cycle links, coach/bus park and set down area, shared use of existing car parking space at the University of Sussex and shared use of land for recreation and parking at Falmer High School.

Changes in design legislation and operational requirements between the period of the submission of the Application in 2001 and final consent in 2007 led to the submission of an amendment Application in 2008 to Brighton & Hove City Council (BH2008/02732). This Application sought to reduce space for employment and increase space for educational uses and was approved by the Council.

Further alterations to the club shop, offices and ancillary support spaces such as toilets and storage received consent through further Planning Applications made in 2010 and 2011.

We have reviewed the 2001 and 2008 Planning Applications, Transport Assessments and the agreed 2008 Planning Conditions to establish a baseline for the consideration of the implemented Transport Management Strategy.

Following the 2008 planning approval the Stadium was built and matches were played from July 2011. The Transport Management Strategy was developed and implemented to ensure that the sustainable travel options operated effectively and fans were well informed of their travel options. In particular a key objective was to discourage the use of the private car by not only by promoting and providing attractive alternatives, but limiting the supply of car parking spaces on site. Therefore the 2008 Planning Application Conditions (agreed 22nd April 2009) required the provision of a minimum of 2,000 and maximum of 2,200 car parking spaces to be provided by the Club within 1.5km of the Stadium.

While the arrangements for sustainable travel modes – walk, cycle, bus and rail – are relatively unchanged from the proposals made in 2008 on site parking has gone through several iterations. It was intended to use land at Falmer High School but with the school becoming the Brighton Aldridge

Community Academy the original land agreement was not completed. Temporary car parking has therefore been secured on land to the northeast of the Stadium, known as Bennett's Field. The future arrangements for car parking on site, including the possible use of the Falmer Released Lands site, are considered in more detail in the analysis in the next section.

In late December 2011 the Club submitted a Planning Application to increase the capacity of the Stadium from the existing 22,500 to 30,750. The Planning Application was supported by a new Transport Assessment and this has been reviewed by our project team. This current Application is currently being considered by the Council and our report will be taken into account in their review.

4 Transport Strategy

The Transport Strategy, as set out in the 2008 Planning Application and Transport Assessment has been adopted and developed over time to meet the operational needs of the Club. By establishing the Stadium Transport Management Group there has been key stakeholder involvement up to and since the first public event in July 2011.

To assess whether the commitments made initially have been met we have reviewed the agreed Planning Conditions which specifically relate to transport, in a table in Appendix 1. We have sought to confirm whether they have been achieved and offer commentary on the success or otherwise of the measures. This is important in terms of setting a baseline for further measures associated with the possible expansion of the Stadium capacity in 2012.

Our view is that there is evidence through the documents presented to the study team or through our observation on match days that the majority of the Conditions have been met. However we have identified a few issues arising from the Conditions not being fully met, which should be addressed:

Item 7: The Stadium shall not be brought into use unless and until a scheme for the integrated provision of suitable secure bicycle parking facilities has been submitted to and approved in writing by the Local Planning Authority and the approved scheme has been fully implemented.

The quality, location and amount of cycle parking at the Stadium at the moment does not meet the requirement of "secure bicycle parking facilities". We understand the club is intending to enhance and upgrade the facilities for cycle parking and to promote cycling more this year, particularly as a part of its expansion plans.

Item 24: The Stadium shall not be brought into use unless and until the new pedestrian footway/cycleway from Falmer High School (from the new junction on the A270) to the Stadium, the detailed design (including materials) of which shall have been submitted to and approved in writing by the Local Planning Authority, has been laid out, constructed and brought into use.

Because of the change in timing of the development plans for the Falmer High School to create the new Brighton Aldridge Community Academy this route is fully open but some of the infrastructure at the southern end of the route is awaiting completion. It would be essential to allow pedestrian access to any new car parking on the Falmer Released Land site.

Item 35: The Stadium shall not be brought into use unless and until details of the arrangements for car parking for a minimum of 2000 and a maximum of 2200 cars at Sussex University and Falmer High School or at alternative locations within 1.5km of the Stadium has been submitted to and approved by the Local Planning Authority and the said car parking provided. No Outdoor Event for which these parking spaces are required in accordance with the Travel Management Plan shall take place unless such parking spaces are available for use by persons attending the said Outdoor Event. The total number of car parking spaces to be provided for Outdoor Event traffic shall not exceed 2350 within 1.5km of the Stadium.

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Parking on site has been subject to change as identified previously. It is understood from the 2008 Transport Assessment that the car park arrangements for match days would be provided in the following locations:

Table 1
Planned parking locations and spaces - 2008

Location	Number of spaces	Number of spaces
	Weekday	Weekend
Park Wall Farm – VIPs	119	119
Existing car parks in Sussex University	900	1100
Shared surface car park at Falmer High School	1,000	1,000
Total	2,019	2,219

The Condition 35 allows for a minimum of 2,000 and a maximum of 2,200 spaces within 1.5km of the Stadium. The exact number of spaces on the Falmer High School site would have been limited to match the lower and upper limits of the Planning Condition.

Unfortunately the land at Falmer High School was unavailable because of the change in status to an Academy and a delay in their redevelopment plans. On this basis an Application for a temporary consent for a period of 3 years for the provision of 650 temporary parking spaces on the land at Bennett's Field for use during 50 event days was sought in 2011 and received planning permission (other spaces at the Copse car park were also added in 2009).

Table 2
Revised parking locations and spaces - 2010

Location	Number of spaces	Number of spaces
	Weekday	Weekend
Park Wall Farm – VIPs	119	119
Brighton University Copse car park – Directors	35	35
Existing car park at Falmer Released Land*	111	111
Existing car parks in Sussex University	900	1100
Temporary car park at Bennett's Field	650	650
Total	1815	2015

* Available but not currently being used by Club

A map of the existing car parks is provided as Figure 1 in Appendix 2.

As part of the current Stadium expansion Application a revision to the Condition 35 is being sought as follows (as stated in the supporting 2011 Transport Assessment prepared by Savell Bird and Axon):

“The Stadium shall not be brought into use unless and until details of arrangements for car parking for a maximum of 3,000 cars at Sussex University and the Brighton Aldridge Community Academy or at alternative locations within 1.5km of the Stadium have been submitted to and approved by the Local Planning Authority and the said car parking provided. No Outdoor Event for which these parking spaces are required in accordance with the Travel Management Plan shall take place unless such parking spaces are available for use by persons attending the said Outdoor Event. The total number of car parking spaces to be provided for Outdoor Event traffic shall not exceed 3,000 within 1.5km of the Stadium.”

We have identified the new parking provision in 2012 on Figure 2, which is in Appendix 2 (park and ride provision is shown in Figure 3, also in Appendix 2). Our calculation of the parking allocation to specific sites following expansion is as follows:

Table 3
Proposed parking locations and spaces - 2012

Location	Number of spaces	Number of spaces
Park Wall Farm – VIPs	119	119
University of Brighton Copse car park – Directors	35	35
Existing car parks in Sussex University	900	1100
Temporary car park at Bennett’s Field	650	650
New and existing car parking at Falmer Released Lands site*	800	800
Total	2504	2704

* Estimate from the Club of the maximum number of spaces to be made available

Therefore 689 additional spaces would be provided to meet potential demand if the expanded capacity Stadium Application is agreed. This is important as the headline parking limits from the original Planning Condition (2,200) and the proposed revised Planning Condition (3,000) do not reflect the actual lower numbers currently operated. The impact of this will be considered in more detail below.

Item 40: No part of the Stadium building shall be occupied or used unless and until a Green Travel Plan relating to the occupiers of the accommodation within the Stadium has been submitted to and approved in writing by the Local Planning Authority. All occupiers of the accommodation in the Stadium building shall be required to comply with the requirements of the approved Green Travel Plan.

Appendix 4 of the Transport Assessment submitted to support the 2008 Application provides a Framework Travel Plan, setting out detail of the proposed transport measures. Following our meeting with the client team it is understood that this Framework Travel Plan has progressed to form much of the current Travel Management Plan (dated 24/7/11), as provided in Appendix 7 of the 2011 Transport Assessment.

However an operational Travel Plan has not been developed or adopted and this is considered a significant shortfall, as it should be a priority to assess sustainable travel options post occupation for all travel demand. The Travel Management Plan focuses on match day travel demand of football fans and as such meets that specific need well. It is equally important to have an operational travel plan

which manages staff and visitor travel on non match days, as we understand that up to 400 staff and visitors may be on site on any given day. With the availability of parking on site it is necessary to continue the strong sustainable travel message to all users of the Stadium.

In summary we can report that almost all of the 2008 Planning Conditions have been fully discharged and that the Club is actively working on resolving outstanding issues, such as cycling and travel planning. Condition 35, concerning parking location and numbers, could not be fully discharged because of changes to the status of Falmer High School and therefore practical temporary arrangements have been made.

5 Current Operation

It is important to test whether the Transport Strategy, as set out in the documents and various commitments to deliver transport measures, is reflected in normal operations. Therefore our review included a match day site visit on 7th January 2012 and our observations from that day were compared to the commentary and surveys in the Transport Assessment (December 2011).

The current mode share, as observed on a match day survey and compared to the predictions in the 2008 Transport Assessment, is reported in the latest TA as follows:

Table 4
Predicted mode share and observed mode share - 2011

	Transport Assessment 2008	Saturday 20th August 2011 Survey
Park and Ride	16%	15.3%
Walking/Drop-off & walk/Bus & walk	21%	16.1%
Car Parking	32%	16.5%
Rail	14%	44.7%
Coach Park	16%	6.9%
Cycle	1%	0.4%
Total	100%	99.9%

The 2011 Transport Assessment includes surveys from both weekday and weekend matches, which have been used to assess current mode share against our own observations.

Attendance figures at home games for the 2011/12 season to date are as follows:

Table 5
Amex Stadium Attendance – 2011/12 Season - to date

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Date	Kickoff	Opponent	Competition	Result	Score	Attendance
6/8/11	15:00	Doncaster	FLC	W	2-1	20,219
9/8/11	19:45	Gillingham	LGCP	W	1-0	16,295
20/8/11	15:00	Blackpool	FLC	D	2-2	19,494
23/8/11	19:45	Sunderland	LGCP	W	1-0(aet)	17,090
27/8/11	15:00	Peterborough	FLC	W	2-0	19,656
21/9/11	19:45	Liverpool	LGCP	L	1-2	21,897
23/9/11	19:45	Leeds United	FLC	D	3-3	20,646
27/9/11	19:45	Crystal Palace	FLC	L	1-3	20,968
15/10/11	17:30	Hull City	FLC	D	0-0	19,722
24/10/11	19:45	West Ham United	FLC	L	0-1	20,686
6/11/11	15:00	Barnsley	FLC	W	2-0	19,841
26/11/11	15:00	Coventry City	FLC	W	2-1	19,108
3/12/11	15:00	Nottingham Forest	FLC	W	1-0	20,385
17/12/11	15:00	Burnley	FLC	L	0-1	19,641
2/1/12	15:00	Southampton	FLC	W	3-0	20,773
7/1/12	15:00	Wrexham	FACP	D	1-1	18,573
14/1/12	15:00	Bristol City	FLC	W	2-0	20,398

Note that attendance for Football League Championship games have ranged from 19,108 to 20,968, an average gate of 20,118. Apart from some less well attended Cup games the Championship match attendance levels have been fairly consistent over the season so far. The current ground capacity is 22,500, so the Club has had some spare seating capacity at all games to date, recognising that some may be away fan's seating allocations not taken up.

In the following section we discuss our observations of the operation of all transport modes during a site visit in early January, 2011. This was for a FA Cup Third Round match and the attendance was 18,573.

The focus for a large number of sustainable travel trips is the Transport Interchange to the east of the Stadium. This facility, combined with the upgraded Falmer railway station, copes well with considerable throughput of fans both before and after each match. The Transport Interchange accommodates the local football special buses (services P, R, and S), all park and ride bus services, supporter's coaches (away and home fans) and taxis. There is some limited temporary cycle parking provision adjacent to the interchange, with motorcycle parking split between the coach park and

adjacent to Village Way. On our site visit approximately 40 scooters and motorcycles were parked here.

Fans access the interchange via steps and ramps, with well organised stewarding ensuring they are directed to their specific services. There is considerable orderly queuing, but the stewards – from the Club and the bus companies – ensure that the crowds are loaded quickly at the end of the game. As fans buy tickets in advance through the travel voucher scheme boarding is quicker than normal service buses. The same stops are used for each match so regular fans know the system for boarding buses and coaches.

Local buses coming from the University of Brighton terminus pick up from a stop on the north side of Village Way and can be held up by traffic emerging from the Transport Interchange. The stewards appear to manage traffic so delays to services buses are reduced when possible. We also observed bus passengers alighting early from services buses and walking to the ground from Lewes Road, and similarly walking out to catch buses heading towards Brighton at stops near Coldean Lane.

All movement onto Village Way is carefully controlled by the stewards and on the day of our site visit worked effectively. Public transport is given priority over cars leaving the Bennett's Field car park and traffic from Village Way west. There are traffic cones set out to prevent parking on Village Way, but fans are still picked up here, sometimes causing additional congestion – better enforcement is required. Similarly some taxis are using one of the Transport Interchange "loops" and Village Way for pickups. We understand this can be a problem and further consideration should be given to a more efficient solution.

Rail services are very busy before and after the match, but effective stewarding outside Falmer Station and on the platforms ensures the safety of fans. Queuing on the station overbridge is well managed, with high levels of steward, Southern railways staff and police involvement. Trains in both directions were usually full on arrival in the hour before and on departure up to 40 minutes after a match. Our observation reflected the survey results quoted in the new Transport Assessment.

Walking & cycling are the other main sustainable travel modes observed on our site visit. Cycling appears to be at a low level, with approximately 66 bicycles observed in total at the two temporary locations. It is expected that the numbers may increase with better weather, more promotion and more secure, higher quality parking provision, as promised by the Club.

The main flow of walking from off site came from Falmer Stadium, the A27 Universities underpass, the path to Moulsecoomb and routes from Falmer Village, over the Drove. It is not possible to be certain about the percentage of pedestrians who have walked from on street parking in Moulsecoomb or Coldean, rather than being locally residents having made the whole journey on foot, or who may have travelled to the periphery of Moulsecoomb by other modes such as public transport or may have been dropped off by car or taxi and then completed their journey on foot, but it is expected to be a significant number of those observed. It was noted that there were pedestrians walking on verges on The Drove and walking up the bank behind the Transport Interchange. Further work on understanding and improving pedestrian routings may be required.

Car parking on and off site was observed on the match day site visit. On site parking at Bennett's Field was well managed and by the start of the match appeared approximately 90% full. Season tickets costing £360 p.a. are required to use this parking. The car park season ticket includes 23 Championship matches and 7 vouchers for cup/friendly matches, which equates to £12 per match. It was noted that many fans left the game up to 15 minutes early to exit the car park, recognising that the priority given to buses exiting from the Transport Interchange commences 10 minutes later – this gives a window for easier departure. The restricted access Copse and Park Farm car parks were not fully occupied. The available car parking at the Falmer Released Lands site was underutilised with only 12 vehicles observed (with no indication whether they were parking as part of the Club scheme), while the approach on Lucraft Road was full.

Our assessment of the park and ride sites accord with the Transport Assessment surveys, in that they all are well used apart from the Racecourse. The reasons for the lower utilisation of the Racecourse site needs further consideration, because it clearly has the capacity to meet additional demand if the ground is expanded. The higher utilisation of the other P&R sites is probably because they are established facilities from when the Club was based at the Withdean, with the fans having used them for 10 years and therefore the Race Course P&R will need time to be seen as an attractive alternative. Additional sites, possibly better located, may be required if the existing park and ride site's capacities can not be expanded.

Our review team noted that Lewes Railway Station car park was almost full on the day of our site visit and there was evidence of fans using it as a park and ride location. The Club had discussed and agreed the use of Lewes and Brighton stations as parking sites with Southern Rail in October 2011, so this is a sanctioned arrangement. There is an unofficial park and ride signposted off the A27 close to Lewes, which we understand does not have planning permission and we believe that the Highways Agency and Lewes District Council are considering taking enforcement action.

On street parking in Falmer Village and in lay-bys on the A27 is effectively prevented by the high profile presence of stewards. Parking on verges on the trunk roads is generally discouraged successfully by the existing temporary rolling Traffic Regulation Order, which establishes clearways, no verge parking and limited waiting in lay-bys. We understand that the Club is in discussion with the Highways Agency about formalising the current temporary arrangements to ensure full legal enforcement.

On street parking by fans in North Moulsecoomb and Coldean was clearly observed, with our team visiting the areas before 1200 and after 1900, as well as just before and during the match. The number of residents cars was noted before and after the match in 7 streets in North Moulsecoomb (Ashurst Road, Barcombe Road, Egginton Road, Halland Drive, Lucraft Road, Newick Road, Ringmer Drive) and 6 streets in Coldean (Coldean Lane, Forest Road, Middleton Rise, Ridge View, Ruslake Road, Park Road). During the match further counts were made to establish any variation in parking numbers on these streets.

There is a non statutory parking scheme run by the club in the Moulsecoomb area, with signing and some enforcement but clearly without the legal enforcement of a Controlled Parking Zone fans are using the nearby residential streets. While a formal beat count survey is required (and we understand they are currently being undertaken) to provide robust numbers of the numbers parking on street in nearby residential areas we calculated that in the order of up to 500 additional cars in total were parked in the two areas. While we accept that not all of these may be associated with the Club, as the residents may have visitors or have returned home during the match period, but a number were clearly fans attending the match. We believe that the reasons for fans using such parking are:

- ease of access and egress when areas closer to the Stadium may be congested,
- a reasonable walking distance to ground,
- fans local knowledge,
- no parking charges, and
- overall convenience

Dependent on the strategy utilised to reduce such impacts (considered below) there may always be an element of such parking unless a Controlled Parking Zone is introduced.

Traffic management on surrounding roads was observed by our team. While there was queuing on the A27 slip roads and The Drove, as well as Coldean Lane/A27/A270 junctions we felt that it was in line with the predictions in the Transport Assessment. The Village Way/Drove junction worked efficiently,

with on this occasion police officers on location revising signal timing as necessary. As we observed the traffic on a Saturday we anticipate congestion could be greater on a weekday match because of existing evening peak hour congestion observed at the Universities, for example, and therefore this would need further surveys to confirm the impact.

We observed effective crowd management by the Club's stewards and a relatively low level of Police support.

The Club makes much of its objective of encouraging fans to arrive early and leave late, effectively spreading the peak access times. The new Transport Assessment offers survey evidence and on the day of our site visit the Club advised us that 75% of the fans were through the turnstiles 30 minutes before kickoff. By observation the ground appeared increasingly busy from 1300 and until 1800, with activity after that confined to the main Club bar and the facilities in the North Stand. This does suggest the Club has been successful in its match day offer, although it is still estimated the majority of the fans will have left within one hour of the final whistle.

Apart from our match day review we have assessed the information given to home and away fans, both in traditional print formats and the Club website, etc. The "Arriving at The Amex" document is simple and clear, although we would expect more practical information on the website to aid and encourage sustainable travel choices. For example the information on cycling is inaccurate as secure parking is not yet provided and it would be good to have cycle routes shown on a map, for example. More work on information will help in the overall cause of promoting alternatives to achieve a balance if the ground capacity is increased in the future.

Our summary of match day travel and transport operations is that it is generally good on site, by delivering the Transport Management Plan measures and effective stewarding but there are the recognised difficulties of on street parking in nearby residential areas and continued pressures on public transport capacity. The next section considers whether these issues can be resolved through the Club's expansion plans or whether they will be exacerbated.

6 Stadium Expansion

The Planning Application for the increase in Stadium capacity was issued to the Council on 19th December 2011. It was registered as Application BH2011/03861 from 9th January 2012. It is described as:

Application for variation of conditions 39 and 43 of approved planning Application BH2001/02418 and variation of conditions 35 and 38 of approved planning Application BH2008/02732. Condition 39 of Application BH2001/02418 and condition 35 of Application BH2008/02732 to read as follows - "The Stadium shall not be brought into use unless and until details of arrangements for car parking for a maximum of 3,000 cars at Sussex University and the Brighton Aldridge Community Academy or at alternative locations within 1.5km of the Stadium have been submitted to and approved by the Local Planning Authority and the said car parking provided. No Outdoor Event for which these parking spaces are required in accordance with the Travel Management Plan shall take place unless such parking spaces are available for use by persons attending the said Outdoor Event. The total number of car parking spaces to be provided for Outdoor Event traffic shall not exceed 3,000 within 1.5km of the Stadium." Condition 43 of Application BH2001/02418 and condition 38 of Application BH2008/02732 to read as follows - "No event shall take place at the Community Stadium with an attendance in excess of 30,750 people".

The expected timescale is for the Application, Transport Assessment and other supporting documents to be reviewed in the period up to March and an Officer's Report to be presented to the Council's Planning Committee around Easter. If successful the Club hope to make the changes to the Stadium over the summer of 2012, to be completed for the start of the new 2012/13 football season.

Transport Strategy Review

Final Report

As part of our general review of the Transport Strategy we have considered the new Transport Assessment (dated December 2011 and prepared by Savell Bird Axon) as a restatement of the Club's approach to key travel and transport issues. The Council's Development Control team will review the Transport Assessment in more detail as part of its statutory planning role.

In summary we see the Stadium expansion impacts as follows:

Capacity increase from 22,500 to 30,750 seats	=	36% increase in stadia capacity
Maximum parking allowed increase from 2,200 to 3,000 spaces	=	36% increase in parking
Actual increase in parking spaces is from 2015 to 2704 = 689	=	34% increase in parking
Additional supporters	=	8,250
Current ratio of parking to supporters	=	1 space per 11.16 supporters
Proposed ratio of parking to supporters	=	1 space per 11.37 supporters

Therefore it could be argued that the proposed parking provision per supporter will be marginally less pro rata than is currently offered. It is at level generally much lower than that found at many new build stadia in England and the use of public transport services and the current spare capacity in existing car parks demonstrates the success of the sustainable travel offer.

Our initial review of the Transport Assessment raised the following matters to be clarified and resolved with the Club:

Report Ref.	Report Content	PBA Comments
1.1.2	<i>The proposals would extend the stadium capacity from the existing 22,500 to a maximum capacity of 30,750.</i>	Note that this is a 36% increase in Stadium capacity but the Club is currently operating with only a small amount of spare seating capacity, much of which could be down to visiting fans not taking up their full allocation.
1.1.4	<i>The scope of the report has been discussed with Officers of Brighton & Hove City Council, the Highways Agency and East Sussex County Council, as set out in the correspondence included at Appendix 1.</i>	The email responses from none of the named organisations are included in the TA. We have subsequently received copies and they raise a number of issues still to be resolved.
1.2.6	<i>One of these relates to Condition 35 of the extant consent, which requires details of arrangements for car parking for a minimum of 2,000 and a maximum of 2,200 cars within 1.5 km of the Stadium to be submitted to and approved by the Local Planning Authority.</i>	We are advised the Club currently provides up to 2,015 spaces within 1.5km on weekends and 1,815 spaces on weekdays. Although the weekday figure is below the minimum set by Condition 35 the Council does not wish to take enforcement action because there is spare capacity within the spaces provided.
1.2.8	<i>A further Application relates to Condition 42 of the extant consent, a requirement of which is to confirm the capacity, location and management of Park & Ride sites. In this regard, an</i>	The Racecourse planning permission was granted, but it does not appear to have been implemented fully, with between 50 to 150 spaces being used. Clearly this offers capacity for

	<i>Application was submitted to formalise land areas at Brighton Racecourse for a regular use of the order of 700 spaces for use as a remote park and ride facility in relation to major outdoor events at the Stadium. This received planning permission.</i>	expansion.
1.2.10	<i>When submitting the original and revised planning Application, the Club were a League One team and planning permission was sought for a Stadium commensurate with their league status at the time.</i>	This is not 100% valid as the Stadium was built with a structure that could be expanded, if the Club were successful. Therefore it could be argued that there was an aspiration and possibly a presumption for future additional capacity.
1.2.11- 1.2.13	<i>The Club are now a Championship team and every league fixture has been sold out to home fans. The vast majority of the Stadium's 22,500 capacity is filled by season ticket holders, leaving less than 2,000 seats available for match-day sales.</i> <i>The Club currently has a waiting list of in excess of 2,000 fans seeking to buy a season ticket.</i>	There may be a 2,000 supporter waiting list for tickets but it is not clear whether this would translate into regular increased attendance. Much would be dependent on the performance of the Club in the Football League and season ticket pricing?
	<i>Notwithstanding this, it is important to recognise that the repositioning of this parking provision from the location considered at the time of the original consent to the Released Land will not result in any materially changed impact on the local highway network.</i>	This relates to the changes from the original plan for up to 1000 spaces on the Falmer High School site and the current 800 spaces plan, as advised by the Club. With less parking this should be true and we would accept there is no change from the predicted impacts from the 2008 TA.
2.3.7	<i>In addition, match day parking is also available on existing car parks in Sussex University.</i>	We were advised by the Club that 900 spaces are available for weekday games and an additional 200 spaces available for weekend games. This is not immediately clear from the TA.
2.4.5 – 2.4.6	<i>Cycle parking facilities exist at Falmer Station and additional cycle parking facilities are provided as part of the Stadium development. In this regard, it should be noted that, since the opening of the Stadium, a temporary parking facility has been provided whilst the demand and best location for a permanent cycle parking facility has been assessed.</i> <i>Following this assessment, it is intended that this existing facility will be upgraded to a permanent, covered facility and that additional stands will be provided next</i>	We were advised that the permanent facility will be provided close to the Station but no firm date given. This needs early resolution as it is a major concern raised by the Council.

	<i>to the Village Way entrance.</i>	
4.2.1 – 4.2.2	<p><i>Research relating to match-day habits of football supporters, including travel characteristics, is contained in supporter surveys that are regularly undertaken by both Football League and the Premier League.</i></p> <p><i>Whilst the most recent Football League survey was undertaken in 2010, it is the 2008 survey that provides the most recent information with regards to home supporter travel to a match.</i></p>	Need further information why more recent survey not used – does it make material difference in the comparisons being made?
4.2.4	<i>With respect to the traditional choice of mode, the 2008 Football League Supporters Survey confirms that 53% of spectators use their own car with a further 17% of spectators choosing to travel as a passenger, i.e. a total of 70%.</i>	The Club has been successful in achieving much lower observed car mode share, although as the type of surveys are different direct comparisons need some caution.
4.3.4	<i>One of the key components of the Travel Management Plan for the site is to effectively control the availability of car parking both physically and in terms of pricing policy. Such control allows the realisation of transportation opportunities offered by non-car modes.</i>	The pricing strategy needs to be set out in more detail in the TA, to demonstrate to the Council that it is suitably flexible to maximise the use of the available parking while acting as a deterrent also.
4.3.8	<p><i>Match Day Surveys undertaken:</i></p> <p><i>Sat 20th Aug 11 – Blackpool – 3pm</i></p> <p><i>Fri 23rd Sept 11 – Leeds – 7:45pm</i></p> <p><i>Mon 24th Oct 11 – West Ham 7:45pm</i></p>	Attendance at these three matches – 19,494; 20,646; 20,686.
4.3.9	<i>(Summary - Listing of actual surveys completed on match days, parking, pedestrian, bus, train, cycle, etc.0</i>	The surveys were agreed with the Council on 20/10/11 but they are generally volume counts which suggests that congestion or delay of current users has not been fully assessed. Plus the sites surveyed are all “agreed” on or off site parking areas, no surveys of surrounding areas in the TA for these dates – we recognise beat counts are currently being undertaken, but they will not be directly comparable with the TA surveys being on different days.
4.4.2	<i>(Modal Split for Amex Stadium as predicted in the TA vs. actual surveyed once operational for Saturday game)</i>	The TA predicted 32% would arrive by car and actual 16.5% is the reality. If the TA predicted 32% car mode share that would suggest, allowing for 2.7 occupants per car, a need for around 2,700 spaces to serve the stadia. While it is good that lower car mode share has been achieved some explanation of the wide discrepancy would be

		useful – the Club suggest it is primarily down to the greater take-up of the rail option.
4.4.3	<i>(Modal Split for Amex predicted in TA v Actual surveyed once operational for Weekdays)</i>	The TA predicted 29% arrive by car and survey suggests 15.6%. Again if the TA predicted 29% that would suggest, allowing for 2.7 occupants per car, there is a need for around 2,500 spaces to serve the stadia. Higher car sharing levels may account for some downward pressure, but not such a significant switch to sustainable modes and therefore it may be that on street parking off site is accounting for some of the difference. The Club suggest it is primarily a result of the greater take-up of the rail option.
4.4.4 - 4.4.8	<i>(Compares the TA, League Supporters and Amex data and determine that the Amex is significantly more sustainable the average stadia use across the UK or against the previous TA.)</i>	These figures can not be fully validated as we have no base data for the UK wide data and we can not be certain that all the users of the stadia have been picked up in the recent surveys. Therefore the data may suggest a betterment over expected, which may well be true, but it is unlikely to be as shown, if other factors are accounted for, we can not assess this until we have seen a match day parking beat survey and observed the level of illegal/unofficial parking in the area.
4.5 - 4.6	<i>(These sections address UK wide vs. Amex arrival patterns, suggesting fans arrive earlier at the Amex. The UK average is that 58% have arrived 20min before kick off, but at Amex 84% have arrived 20min before kick off)</i>	The Club claims that the extended arrival pattern at the Amex demonstrates that fans take the opportunity to access the stadia across a longer period compared to the major congestion at other grounds, closer to kick off. There is no data on the departing timeframe in TA, which is when the need to spread the peak movement of fans is most acute. The Club advised us that encouraging fans to stay later is a key objective, but it is not explicit in the TA.
5.1.1	<i>Whilst a majority of matches at the Stadium will occur at a weekend, for the purpose of considering the traffic impact of the proposals of the local highway network, the weekday pre-match period will be the most onerous period for assessment.</i>	In principle this is correct, but the adjacent roads are primary links to and from Brighton and at weekends with retail trips etc, the actual congestion can be worse. The Club advises us that weekday evening arrival times have been agreed with the Council as the most onerous time period for assessment.
5.4.5	<i>As can be seen from the above table (5.1), the flows that actually occur at the various junctions during the weekday pre-match period on a match-day are substantially lower than the levels of traffic that were predicted, and accepted by the highway authorities, at the time of the grant of consent for the Stadium.</i>	This would suggest that the original TA had higher trip predictions which have not been forthcoming, therefore if all parties agreed those rates there is spare capacity within the level predicted. This is only for arrivals and no similar data for departing trips at the end of a game have been provided. As stated this is for weekday only.

7.1.9	<p><i>The proposed revised wording of Condition 39 of BH2001/02418/FP and Condition 35 of BH2008/02732 is set out below:</i></p> <p><i>“The Stadium shall not be brought into use unless and until details of arrangements for car parking for a maximum of 3,000 cars at Sussex University and the Brighton Aldridge Community Academy or at alternative locations within 1.5km of the Stadium have been submitted to and approved by the Local Planning Authority and the said car parking provided. No Outdoor Event for which these parking spaces are required in accordance with the Travel Management Plan shall take place unless such parking spaces are available for use by persons attending the said Outdoor Event. The total number of car parking spaces to be provided for Outdoor Event traffic shall not exceed 3,000 within 1.5km of the Stadium.”</i></p>	<p>The changes to Condition 35 have other possible impacts:</p> <ul style="list-style-type: none"> • It removes the previous minimum level of parking, which may not be an issue? • It does not set a separate maximum for weekdays and weekend matches? • Does the Park Wall Farm and the Copse car park spaces count against this maximum, even though not explicitly mentioned? We would expect that to be the case.
8.2.2	<p><i>As such, the Club is keen to introduce further measures to seek to at least double the number of supporters travelling by bicycle as an average over the season.</i></p>	<p>This is linked to the commitment in 2.4.5 to make permanent the cycle parking facility. A doubling of the observed cycling mode share of 0.4% on weekend and 0.3% on weekday is an increase of 80 and 60 cyclists respectively (on an average Championship gate of 20,118). Still perhaps a low target compared to the cycling mode share in Brighton and Hove, it is comparable to other football clubs – most clubs lower than 1%, but Nottingham Forest and Crystal Palace both 1%, Fulham 2%, Arsenal 6%, for example in 2008.</p>
8.3.5 – 8.3.7	<p><i>It should be noted that, in determining this (bus capacity), account has been taken of the intention to increase the capacity of buses on the 25 service from 85 to 100 through the introduction of ‘bendy-buses’, and to increase the frequency of the service 25 from 5 to 6 buses per hour on a Saturday.</i></p> <p><i>Based on this, it can be concluded that substantial spare capacity exists. For the purpose of the analysis, it is assumed that up to 800 additional supporters could be accommodated on the scheduled bus services, this being the lowest spare capacity available during any of the 2 hour pre or post-</i></p>	<p>It is not clear if all service 25 workings are being converted to articulated buses and how firm the commitment from the bus company is – there is not a letter confirming this, for example, in the TA. In particular there will be concerns about the capacity on weekday match arrivals if in conflict with regular commuter flows. Therefore the Club should be careful in claiming “substantial spare capacity exists”. However we accept that adding bus capacity is relatively simple if the demand is regularly demonstrated and the operator can see a commercial case for it.</p>

	<p><i>match periods.</i></p> <p><i>Brighton and Hove Bus & Coach Company have also indicated that the frequency of the scheduled bus services could be further increased if sufficient demand existed.</i></p>	
8.4.6 – 8.4.8	<p><i>With regards to the latter, we have been advised that, not only is there limited additional rolling stock available, but signalling and power restrictions would also preclude an increase in the frequency of trains or the lengthening of trains without substantial infrastructure costs. As such, currently there is little potential to increase the capacity of trains serving Falmer Station.</i></p> <p><i>We have also been advised by Southern Rail that there is little spare capacity available on those existing services that currently accommodate peak supporter rail demand, i.e. in the hour before kick-off and the 30 minutes after full time. However, we have been advised that spare capacity exists on the trains that operate outside these peak periods of supporter demand.</i></p> <p><i>Therefore, rail can accommodate additional supporters by further extending the arrival and departure profiles of supporters, to utilise the spare capacity that exists on those train services operating over an hour before kick-off and over 30 minutes after full time.</i></p> <p><i>We have been advised that written confirmation is to be provided from Southern Rail to the Club's Transport Manager formally confirming the above.</i></p>	<p>We would agree with the rail industry's assessment of the lack of infrastructure and operational capacity in the peak period, but do not see detailed evidence in the TA of how fans can be encouraged more to spread their travel patterns.</p> <p>The letter from Southern Railways noted in 8.4.9, stating the level of spare capacity, has not been seen and therefore we would expect to see further assessment of peak shoulder rail capacity to support the TA.</p>
8.5.1 – 8.5.7	<p><i>(Existing Park & Ride sites at Mill Lane and Mithras House and the temporary permission for use of up to 700 spaces at the Race Course.)</i></p>	<p>States that the club seek to make the temporary permission granted in 2011 at the Race Course permanent in a future Application. The site is currently 50% occupied, but if it was full the current bus frequency and number of buses would be insufficient. The club propose to address this if the stadia expansion is granted with additional bus services.</p>
8.5.8 – 8.5.14	<p><i>In addition to the existing park and ride sites at Mithras House, Mill Road and the Racecourse, it is also anticipated</i></p>	<p>If the 650 spaces on Bennett's Field can not be renewed or an alternative secured close to the Stadium, the club will need to create an additional</p>

	<i>that, should in the future, parking no longer be available at Bennett's Field, an additional park and ride facility or facilities may be required as part of the amendments to the transport strategy required in association with an extension to the stadium.</i>	P&R facility of up to 1,000 spaces. This is a possible like for like replacement scheme and would be outside the 1.5km criteria, but there is no site identified or Application proposed in the TA at this time. A Grampian type condition is suggested by the Club that would limit the usage of the expanded capacity should Bennett's Field not be renewed or an additional facility such as a P&R site not be brought into use.
8.6.1	<i>There are currently three 'football specials' routes, P, R and S. From the surveys, these buses made a combined total of 20 drops, with 525 supporters being dropped off at the stadium prior to the midweek match. This equates to an average occupancy of just over 26 supporters per bus, and there is clearly spare capacity available on these existing services to accommodate additional supporters.</i>	In discussion with the Club it was suggested that there is not as much spare capacity as described, as these before match observations do not reflect the full departure loadings after a game. The TA should be clearer on this if the spare capacity for 1,000 fans is not available – again providing additional vehicles would be a commercial decision by the operator but is relatively simple to implement.
8.6.5	<i>As such, as part of the extension proposals, the Club will trial the provision of a shuttle service from Brighton City Centre to The Keep.</i>	This is a service improvement sought by the Council and the commitment to a trial such a shuttle service is noted.
8.8.2	<i>With regards to the Bennett's Field car park, during the weekday matches surveyed, some 70-100 spaces were unoccupied. Based on the average occupancy observed at the car park of 2.7 supporters per vehicle, this would cater for between 190 and 270 additional supporters.</i>	There is limited spare capacity at the Bennett's Field site, but if full, the increase will not in our view have a material impact on the highway network.
8.8.8 - 8.8.12	<i>900 spaces are currently available at the University of Sussex for a weekday match, however, only around 500 spaces are currently being used on a match-day.</i>	It will be necessary to assess the impact of the additional trips to the University car park, to determine if they are they still within the levels of trips set in the original TA. Note that the highway impacts considered in this section of the TA are for weekday matches only.
8.8.13 – 8.8.15	<i>During the development of the Academy, 111 spaces are currently available on the Released Land, but these have, so far, not been brought into use. Nonetheless, these could cater for an additional 300 supporters based on an occupancy of 2.7 supporters per car (as observed at Bennett's Field).</i>	Why haven't these spaces been brought on line to seek to remove displaced parking in adjacent roads. Is it that price/distance make them less attractive? If so will the extra spaces proposed on the Released Land be used – probably but Club will need to indicate how they will incentivise the use of paid spaces on the Falmer Released Land (and not free on-street spaces).
8.8.16 – 8.8.23	<i>In addition, as previously stated, during the consideration of the planning Application for the Stadium, consent was granted for of the order of 1,000</i>	We understand that in the TA all spaces have been assumed to be completely occupied at Sussex University, Bennett's Field and including

	<p><i>parking spaces to be made available at Falmer High School.</i></p> <p><i>As a requirement of the continuing transport strategy we have assumed that the full parking provision at Falmer Academy continues to be necessary.</i></p> <p><i>As identified above, 111 spaces are currently available at the Falmer Academy Road Side, therefore, a further 889 spaces will be provided, which will cater for of the order of 2,400 supporters. These spaces will be accessed via the newly constructed A270 junction.</i></p>	<p>Falmer Academy at 1000 spaces.</p> <p>There are no details in the TA on the practical or risk issues in using a one way restricted link to serve the 1,000 spaces and how this will be managed in terms of people movement to and from the stadia and their interaction with cars entering and existing. However separately from the TA the Club have provided a stewarding/marshalling plan and from our observations on how they manage the crowds in the coach park and at Falmer Station see no reason why they cannot manage this effectively.</p> <p>In discussions with the Club we were advised that the Released Land would only support 800 spaces (a figure we have subsequently used in our parking space total). The difference between the TA and that position will need to be resolved.</p>
<p>8.9.1 – 8.9.8</p>	<p><i>(These sections summarise the number of supporters by their chosen mode, which based on the methodology appear to be numerically correct and assumes 2 options that Bennett’s Filed is retained and the new P&R is not provided and the reverse)</i></p>	<p>We don’t take issue with the parking assumptions or the basic numerical methods to calculate the Table 8.3 and 8.4 figures, but have identified variations in the sections above which could alter the balance of possible solutions. The Table should be reviewed and updated as necessary, to ensure all additional trips can be catered for.</p>
<p>8.11.7</p>	<p><i>We would point out that the Section 106 Agreement in relation to the original stadium consent included an obligation towards the funding of a study and potential works at the A27/B2123 junctions and suggest that this could be used to explore the potential for queuing traffic to use both lanes of the A27 eastbound off-slip.</i></p>	<p>This suggestion makes sense as the perception of excessive queuing and resulting congestion needs to be addressed by encouraging trips to migrate to more sustainable modes and by better utilising the physical capacity of the junction.</p>
<p>9.2</p>	<p><i>(The club are going to support the implementation of a temporary “resident only” parking scheme for match days within Coldean Lane area to deter the additional parking highlighted by residents.)</i></p>	<p>While the voluntary scheme and the use of temporary match day signage was reasonably successful at Withdean consulting on a more permanent solution should be required through a Condition. Secondly no allowance of where these car using supporters will displace to has been considered in the TA, only the mode and location of the new 8,250 supporters. There may well be scope in the Park & Ride options to accommodate this displacement. Any modal assessment and traffic review may need to combine the additional 8,250 supporters and those displaced from this area. There are no survey results to determine the exact nature of this off site issue, but we understand the Council is currently undertaking parking surveys.</p>

9.3	<i>(The issues of drop off and taxis around the stadia is an issue that is being assessed with alternative locations being proposed and better enforcement in Village Way and Falmer Village)</i>	In terms of drop off or taxis, this is hard to enforce or prevent within standard highway law, as such the increase in stewarding and the liaison with companies coupled with additional signage are likely to be only actions possible.
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Subsequent to this initial analysis a number of issues were raised with the Club and their transport consultants. Further information has been provided and we have been able to understand the Transport Assessment assumptions and calculations better.

However some potentially significant issues need further clarification and resolution to satisfy the Club and Council's shared objective of increasing the capacity of the Stadium without having an adverse impact on travel and the community:

- Off Site Parking – Surveys are currently being undertaken by the Club and the Council to ascertain the level of on street parking by fans and this will influence the decision whether to consult on establishing a CPZ, which is accepted by all as needing resolution. By possibly introducing a match day Controlled Parking Zone in the North Moulsecoomb and Coldean areas there appears to have been no consideration of the possibly unintended consequence of relocation, however. Where will these drivers be displaced to, with the new and existing sites being fully utilised to meet demand from the new 8,250 supporters, even with the Club's anticipated higher levels of car sharing occupancy?
- On Site Parking - The Transport Assessment suggests that while Bennett's Field is to be retained on a temporary basis alongside the Falmer Retained Land site, additional Park & Ride provision will be sought as a replacement when necessary. We now understand this is the Club's preferred strategy but we see this approach as a potential risk, as securing a park and ride site in Brighton and Hove is not easy. However a planning condition is suggested which would ensure that should Bennett's Field or an additional P&R site not be available then the capacity of the Stadium would be limited to slightly in excess of 29,000 spectators. The pricing strategy applied to the sites within the Club's control is also a tool that should be better utilised to ensure that Club car parks are full and unofficial on street parking less attractive.
- Mode Share – From the surveys walking seems to be much higher than predicted on weekdays, whilst car driver levels much lower than predicted, which suggests a possible link with unofficial parking in nearby residential areas, where these 'walkers' are possibly coming from. Although they are not parking at the Stadium parking facilities it doesn't mean they are not drivers. This points to a concern on the surveys and the reported mode share, as it is focussed on the mode used for the last mile of the trip – unsurprisingly walking scores highly as walking from nearby on street parking, bus stops and local homes are combined. More qualitative surveys would allow consideration of both primary and secondary mode of transport. (On the positive side, observed train loadings are much higher than predicted, although again this may be a result of fans using rail for the short last leg of their journey).
- Demand - With 8,250 additional seats, even with the reported modal split of 16.5% using car parking, the Club would still be generating 1,361 additional cars - (if we assume the original 29% car mode split we get 2,393 additional cars), yet the Club are only seeking an additional 800 spaces over that already agreed, which raises additional concerns regarding off site parking and public transport capacity. However all "additional" cars have been considered in the TA quantitative traffic assessments for robustness.
- The Transport Assessment also says the existing buses can accommodate 1,000 additional supporters and trains an additional 1,500 - 2,500 'if the arrival departure profile is spread out'. Our observations suggest there is poetically a shortfall in public transport capacity here, even if

extended arrival/departure times are achieved. New shuttle bus services from Brighton to the Stadium (or the Level to the Keep) however should be considered only if additional local bus services are ineffective, uneconomic or unattractive in meeting additional demand (there are practical capacity issues with using the Keep bus stop for the Shuttle service and we advise developing alternative routing options). The physical capacity of the Transport Interchange, as currently configured, may also be insufficient to take many more vehicles for post game departures and may need to be reconfigured to allow more vehicle layover space.

- The 'comparison with other stadiums' is an average modal split of Premier and Football League teams, rather than a comparison of similar stadia in similar locations etc. While the mode share compares favourably with many clubs across all divisions and types of locations, there needs to be more evidence that the Amex Stadium is better against direct comparators. As such detailed data is limited it is not possible in this review to fully test this matter and to some extent could be seen as irrelevant, as the focus is wholly on what can be achieved in the specific circumstances of Brighton and Hove.
- We note that the Transport Assessment did not include detailed analysis to the geographical spread of demand for travel from fans by the relatively simple exercise of mapping all existing season ticket holders by postcode on a GIS map. This would inform the debate about offering the appropriate type of provision and enable a comparison between trip lengths and possible best locations to intercept trips with additional park and ride facilities, for example.

In summary the prime issue that arises in reviewing the new Transport Assessment is that the Club has to achieve a balance between offering more parking on site, while discouraging off site parking, increasing public transport capacity and use, encouraging more park and ride, and influencing travel patterns to spread peak travel. In principle we think that the case for a total of up to 800 additional car parking spaces on the Falmer Released Land can be made, as part of a package of transport measures, based on the clubs success to date in encouraging sustainable travel.

The evidence from the Transport Assessment is not clear that the non car mode trips are likely to be increased with the actions proposed, noting that there are already constraints on rail capacity, for example. If the transport system can not provide the trips by the more sustainable modes which have mass capacity (i.e. primarily public transport) then the Club may have to consider a higher provision of parking off site. We believe that this could be achieved within the maximum of 3,000 parking spaces within 1.5km and if necessary an additional 1,000 Park & Ride spaces to replace Bennett's Field, so as to remain consistent with the original Conditions.

7 Recommendations

This review has considered the operation of the new Amex Community Stadium in terms of its performance against the original sustainability objectives, its Transport Strategy and how well it has met the Planning Conditions agreed in 2008. The Stadium is recognised as one of the most sustainable in transport terms of the new stadia in the UK and is now seeking to accommodate further expansion with its continued commitment to sustainable travel.

The physical expansion of services and facilities that we have identified may not be required if the Club's approach to spreading the peak demand for services is successful, new parking on and off site is offered and car sharing numbers increased. However the Council needs confidence that this approach of influencing behaviour will be effective and that safeguards are in place in case it is unsuccessful.

The outline recommendations below will need further development in the context of the Council's own detailed review of the Planning Application and Transport Assessment but are offered to encourage debate on the priorities in delivering an improved Stadium Transport Strategy.

Summary of Recommendations:

- The Transport Management Plan and Travel Plan need further development and resources to fully deliver a transport system to accommodate the projected growth, with a priority given to influencing behaviour in terms of travel choices
- Improve information on Club website with more proactive travel planning tools
- Better walking and cycling facilities need to be delivered, with proactive encouragement to achieve more ambitious targets
- Review the pricing strategy for parking to influence choices, particular to reduce attractiveness of on street parking and ensure full utilisation of existing spaces
- On street parking in North Moulsecoomb and Coldean may not be resolved without legal enforcement and therefore consultation on a match day Controlled Parking Zone is required to meet residents concerns
- The use of the Falmer Retained Land parking site should be conditioned with a requirement by the Club to work to a stewarding marshalling plan to be agreed in advance with the Council to ensure safe access for all users. Improvements for non match day use for pedestrians and cyclists should be part of the package
- On parking generally it is necessary resolve the issue of the future total number of spaces required if Bennett's Field provision is removed before 2014, including considering the alternative of additional park and ride provision to intercept trips on popular corridors This can properly be controlled by an appropriate Grampian type condition
- Increased capacity will potentially be required on the Transport Interchange and a new layout/remodelling may then be necessary to accommodate additional bus and coaches
- Public transport service capacity will need to be increased, with discussions with the Train Operating Company and Network Rail to secure additional capacity in the longer term required but additional local service buses should be considered first, with the Level to the Keep (or an alternative routing) shuttle buses proposal to be developed as secondary option
- Better surveys are required to understand more accurately the level of walking as the primary mode of travel, for example

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Appendix 1

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Application Reference: BH2008/02732

Agreed Planning Conditions – Review

Key – 3 – Complete, 2 – Commenced, but incomplete, 1 – Not started, 0 – No information

Item No	Condition	Status	Comment
2	The Stadium shall not be brought into use until the Transport Interchange as proposed in the Application to Lewes District Council ref: LW/02/1595, the development proposed in Applications C&D (ref: BH2003/02499 & LW/03/1618) and other means of access and parking for vehicles and cyclists and pedestrian facilities which form part of this permission have been laid out, constructed and provided, such Interchange, access, parking and other facilities shall be retained as such at all times. Reason: In order that the transport arrangements in respect of the use of the Stadium are capable of operating effectively and safely and meet sustainable transport objectives in compliance with policies TR1, TR2, TR4, TR6, TR14, TR18 and TR19 of the Brighton & Hove Local Plan.	3	Transport Interchange constructed and fully operational
7	The Stadium shall not be brought into use unless and until a scheme for the integrated provision of suitable secure bicycle parking facilities has been submitted to and approved in writing by the Local Planning Authority and the approved scheme has been fully implemented. Reason: To ensure that satisfactory facilities are provided for the parking of bicycles and to encourage travel by means other than private motor vehicle in compliance with policy TR14 of the Brighton & Hove Local Plan.	2	Bicycle racks are provided, but are not to suitable secure standard. Club plans to upgrade facility.
26	No car park to the west of the stadium shall be used for events finishing after 11.00pm. Reason: In order to protect the amenity of nearby residents and to minimise noise pollution in compliance with policy QD27 of the Brighton & Hove Local Plan.	0	To be confirmed, no events after 1100 to date? Expect Condition to be met.
29	Refuse collection and deliveries shall only take place between		

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	<p>specified hours, details of which shall be first submitted to and approved in writing by the Local Planning Authority except at those parts of the Application site forming part of the campus of the University of Sussex and Falmer School.</p> <p>Reason: In order to protect the amenity of adjoining occupiers and to avoid vehicle congestion at peak hours in compliance with policies NC6 and QD27 and TR7 of the Brighton & Hove Local Plan.</p>		
30	<p>The Stadium shall not be brought into use unless and until:</p> <ol style="list-style-type: none"> 1) The Link Road between Stanmer Park Road and the University of Sussex as shown on Plan No. HED/307. VWN.PP.002.REV B has been constructed in accordance with the said plan and brought into use; 2) The Link Road shall thereafter be available at all times to provide vehicular access and egress to the University of Sussex; 3) The existing access to the University of Sussex from the A27 to Falmer House Road shall thereafter be closed to all vehicular traffic except emergency vehicles, in the manner detailed at (iv); 4) Vehicular access to the development and the University of Brighton from the westbound A27 on slip shall be restricted to emergency vehicles by a locked gate or demountable bollards; 5) Prior to the commencement of works on the link road detailed plans/drawings showing the proposed construction details of the proposed link road, closure of Falmer House Road and all associated works including surfacing materials shall be submitted and approved in writing by the Local Planning Authority and the Highways Agency. <p>Reason: In order that the transport arrangements in respect of the use of the Stadium are capable of operating effectively and safely and meet sustainable transport objectives in accordance with policies TR1, TR2, TR4 and TR6 of the Brighton & Hove Local Plan.</p>	3	All highways works complete and operational
31	<p>The Stadium shall not be brought into use unless and until the new traffic signal controlled junction(including A27/A270) eastbound flyover) at the access to Falmer High School and Stanmer Park has been laid out, constructed and provided to the satisfaction of the Local Planning Authority and the Highways Agency.</p>	3	New junction implemented and operational

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	Reason: In order that the transport arrangements in respect of the use of the Stadium are capable of operating effectively and safely and meet sustainable transport objectives in accordance with policies TR1, TR2, TR4 and TR19 of the Brighton & Hove Local Plan.		
32	<p>Prior to occupation plans shall be submitted to and approved by the Local Planning Authority showing the detailed layout of the taxi/drop off facility adjacent to Falmer High School and the Stadium shall not be brought into use until the taxi/drop off facility has been laid out in accordance with such approved plans, constructed and brought into use.</p> <p>Reason: In order that the transport arrangements in respect of the use of the Stadium are capable of operating effectively and safely and meet sustainable transport objectives in accordance with policies TR1, TR2, TR4, TR6, TR14, TR18 and TR19 of the Brighton & Hove Local Plan.</p>	3	Completed and operational
33	<p>The Stadium shall not be brought into use unless and until the new footbridge across the railway line at Falmer Station, the detailed design (including materials) of which shall have been submitted to and approved in writing by the Local Planning Authority has been laid out, constructed and brought into use.</p> <p>Reason: In order that the transport arrangements in respect of the use of the Stadium are capable of operating effectively and safely and meet sustainable transport objectives in accordance with policies TR1, TR2, TR4, TR6, TR14, TR18 of the Brighton & Hove Local Plan.</p>	3	Completed and operational
34	<p>The Stadium shall not be brought into use unless and until the new pedestrian footway/cycleway from Falmer High School (from the new junction on the A270) to the Stadium, the detailed design (including materials) of which shall have been submitted to and approved in writing by the Local Planning Authority, has been laid out, constructed and brought into use.</p> <p>Reason: In order that the transport arrangements in respect of the use of the Stadium are capable of operating effectively and safely and meet sustainable transport objectives in accordance with policies TR1, TR2, TR4, TR6, TR8, TR11, TR12, TR14 and TR15 of the Brighton & Hove Local Plan.</p>	2	Designed and partially built but not completed because of change in Brighton Aldridge Community Academy development plans.
35	The Stadium shall not be brought into use unless and until details of the arrangements for car parking for a minimum of 2000 and a maximum of 2200 cars at Sussex University and Falmer High School	3	Falmer High School spaces were not made available. Parking spaces therefore provided on site through the use of Bennett's Field temporary car park (agreed by separate planning

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	<p>or at alternative locations within 1.5km of the Stadium has been submitted to and approved by the Local Planning Authority and the said car parking provided. No Outdoor Event for which these parking spaces are required in accordance with the travel Management Plan shall take place unless such parking spaces are available for use by persons attending the said Outdoor Event. The total number of car parking spaces to be provided for Outdoor Event traffic shall not exceed 2350 within 1.5km of the Stadium.</p> <p>Reason: In order that the transport arrangements in respect of the use of the Stadium are capable of operating effectively and safely and meet sustainable transport objectives in accordance with policies TR1, TR2, TR4, TR6, TR18 and TR19 of the Brighton & Hove Local Plan.</p>		<p>Application). Variation to this condition now being sought to accommodate expansion in club capacity.</p>
40	<p>No part of the Stadium building shall be occupied or used unless and until a Green Travel Plan relating to the occupiers of the accommodation within the Stadium has been submitted to and approved in writing by the Local Planning Authority. All occupiers of the accommodation in the Stadium building shall be required to comply with the requirements of the approved Green Travel Plan.</p> <p>Reason: In order that the transport arrangements in respect of the use of the Stadium are capable of operating effectively and safely and meet sustainable transport objectives in accordance with policies TR1, TR2, TR4, TR6, TR8, TR14, TR18 and TR19 of the Brighton & Local Plan.</p>	2	<p>Travel Plan Framework agreed as part of Transport Assessment, but no operational Travel Plan issued by Club or agreed with the Council. Note includes all users of site, including staff and visitors on non match days.</p>
41	<p>No development shall be commenced (with the exception of archaeological or other preliminary site investigations) until a Travel Management Group has been established in accordance with the terms of reference submitted to and approved in writing by the Local Planning Authority for the purpose of consultation with interested parties as to arrangements for travel management associated with the use of the Stadium and the preparation of the Travel Management Plan as required by Condition 42.</p> <p>The parties to be invited to become members of the Travel Management Group shall include:</p> <p>The Contractors (during Construction Period) The Company Brighton & Hove Council The University of Brighton</p>	3	<p>Transport Management Group established and meeting regularly.</p>

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	<p>The University of Sussex Sussex Police British Transport Police East Sussex Fire Service East Sussex Ambulance Service East Sussex Highway Authority The Highways Agency Brighton & Hove Bus and Coach Company Southern Railway Lewes District Council Falmer Parish Council Or any successor body to the said groups, organisations or Councils. Reason: In order to ensure that there is sufficient consultation with interested parties to ensure that the Travel Management Plan achieves the efficient and effective transportation of users of the Stadium whilst meeting sustainable transportation objectives in accordance with policies TR1, TR2, TR4, TR6, TR8, TR14, TR18 and TR19 of the Brighton & Hove Local Plan.</p>		
42	<p>The Stadium shall not be brought into use unless and until a Travel Management Plan prepared in consultation with the Travel Management Group has been submitted to and approved in writing by the Local Planning Authority. The Travel Management Plan shall include details of:</p> <ol style="list-style-type: none"> 1) Match ticket sales points; 2) Provision of Transport Voucher or equivalent and journey/modes to be covered by the same; 3) Capacity location management and operational arrangements of Park and Ride sites and the Bus and Coach Park; 4) Provision of Signage directing vehicles, pedestrians and cyclists to Stadium and Parking; 5) Public Transport arrangements to be provided including (but not limited to) additional public transport capacity for indoor and outdoor events; 6) A Parking Management Strategy for the Controlled Parking Zone as defined in Condition 46 below; 7) Methodology for assessment of additional traffic impacts; 	3	<p>Document provided and reviewed, meets specific information requirements. No indication of when or how often it will be updated, current version is dated 24.7.11 – would expect revised version reflecting first 6 months operational experience.</p>

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	<p>8) Publicity arrangements in respect of parking restrictions within the Stadium complex and in the vicinity of the Stadium including (but not limited to) restrictions on parking on the Falmer Campus of the University of Brighton in Falmer Village and in the Stanmer Park and the use of non-car travel modes (to include away supports);</p> <p>9) Pedestrian routing to and from the Stadium;</p> <p>10) Management of Pedestrian Routes;</p> <p>11) An Information Strategy for publicity of travel details and advice of spectator behaviour.</p> <p>12) Mechanism for monitoring and review of the Travel Management Plan;</p> <p>No indoor or outdoor event(s) (which for the avoidance of doubt will include conferences and banquets) with an anticipated individual; or cumulative attendance at any time of 250 or more shall take place at the Stadium other than in accordance with the Travel Management plan or such separate Travel Management Plan as shall have been submitted to and approved in writing by the Local Planning Authority specific to that Event.</p> <p>Reason: In order that the transport arrangements in respect of the use of the Stadium are capable of operating effectively and safely and meet sustainable transport objectives in accordance with policies TR1, TR2, TR4, TR6, TR8, TR14, TR18 and TR19 of the Brighton & Hove Local Plan.</p>		
43	<p>The Stadium shall not be brought into use unless and until a Stewarding Plan (which for the avoidance of doubt shall not apply to the area of the Stadium or adjoining concourse) shall be submitted to and approved in writing by the Local Planning Authority. The Stewarding Plan shall include details of:</p> <ol style="list-style-type: none"> 1) Stewarding arrangements for the Match Day Parking Zone before, during and after Outdoor Events; 2) Stewarding arrangements for the Bus and Coach Park before, during and after Outdoor Events; 3) Stewarding arrangements for pedestrian and cycle access routes in the vicinity of the Stadium; 4) Stewarding arrangements for the Park and Ride sites before, during and after Outdoor Events. 	3	Document provided and reviewed, meets specific information requirements.

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	<ol style="list-style-type: none"> 5) Stewarding arrangements for train station and routes to Falmer Station before, during and after Outdoor Events; 6) The Provision of situation response stewards to respond as necessary to local problems arising as a result of Outdoor Events held at the Stadium; 7) Stewarding arrangements for preserving Campus security and amenity and free flows of traffic (to include pedestrian, vehicular and cyclists) to and from the Campus before, during and after Outdoor Events (subject to such arrangement as may be agreed for the checking of passes or other authorisation); 8) Stewarding arrangements for the supervision of bus queues outside the Bus and Coach Park in the vicinity of the site before, during and after Outdoor Events; 9) Post-event litter collection; 10) A mechanism for stewards, the University and local people to advise of breaches of the Stewarding Plan, or parking restrictions or of disorderly behaviour; 11) Equipment to be supplied to Stewards; 12) Arrangements for placement of temporary signs; <p>No event with an anticipated attendance of 500 or more shall place at the Stadium other than in accordance with the Stewarding Plan or such separate Stewarding Plan as shall have been submitted to and approved in writing by the Local Planning Authority specific to that Event.</p> <p>Reason: In order that the transport arrangements in respect of the use of the Stadium are capable of operating effectively and safely and meet sustainable transport objectives in accordance with policies TR1, TR2, TR4, TR6, TR8, TR14, TR18 and TR19 of the Brighton & Hove Local Plan.</p>		
44	<p>The Stadium shall not be occupied by City College Brighton & Hove until a Travel Management Plan detailing means of travel for staff and students to the Stadium has been submitted to and been approved in writing by the Local Planning Authority.</p> <p>Reason: In order that the transport arrangements in respect of the use of the Stadium are capable of operating effectively and safely and meet sustainable transport objectives in accordance with policies TR1, TR2, TR4, TR8, TR14, TR18 and TR19 of the Brighton & Hove</p>	2	Understood development and use by City College Brighton has not taken place.

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	Local Plan.		
45	<p>The car parking hereby approved within the stadium itself shall only be available for use by occupiers and users of the stadium.</p> <p>Reason: In order to prevent increasing the general availability of car parking spaces in the area and to meet sustainable transport objectives in compliance with policies TR1, TR2, TR19 of the Brighton & Hove Local Plan.</p>	3	Car parking provided and controlled as per Condition requirement.
46	<p>No use of the Stadium for Outdoor Events shall take place unless and until Outdoor Event day Controlled Parking Zone is brought into operation for the duration of each Outdoor Event and for three hours either side of the start and finish times of each Outdoor Event. The area covered by the Controlled Parking Zone is identified in inquiry documents BHA 251/253 and 252 at Plans 3 and 2 respectively but for the avoidance of doubt shall include the village of Falmer, The Controlled Parking Zone will in every case operate to prevent visitors to the Outdoor Event from parking their vehicles within the area controlled by the Controlled Parking Zone.</p> <p>Reason: In order that the transport arrangements in respect of the use of the Stadium are capable of operating effectively and safely and meet sustainable transport objectives in accordance with policies TR1, TR2, TR4, TR6, TR8, TR14, TR18 and TR19 of the Brighton & Hove Local Plan.</p>	0	The position on the CPZ to be confirmed by the Club.
53	<p>Prior to occupation a scheme of landscaping, which shall include hard surfacing, means of access, lighting, planting and means of enclosure for the construction of a car park at Falmer High School (or an alternative location to be agreed within 1.5km of the Stadium) shall be submitted to and be agreed in writing by the Local Planning Authority.</p> <p>Reason: In order that the transport arrangements in respect of the use of the Stadium are capable of operating effectively and safely and meet sustainable transport objectives in accordance with policies TR1, TR2, TR4, TR6, TR18 and TR19 of the Brighton & Hove Local Plan.</p>	2	Not undertaken because of change in Falmer High School/Brighton Aldridge Community Academy redevelopment plans. However was undertaken on Bennett's Field temporary car park.

Appendix 2

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Site Plans