



**Brighton & Hove  
City Council**

**Proposed Submission City Plan Part 2  
Brighton & Hove Development Plan April  
2020**

**Hearing Session: 12 November 2021 (PM)**

**Statement in Response to Matter 15:  
Transport and Travel**

**BY  
BRIGHTON & HOVE CITY COUNCIL**

## **List of Abbreviations**

CPP1 - City Plan Part 1  
CPP2 – City Plan Part 2  
LTP – Local Transport Plan  
NPPF - National Planning Policy Framework  
SA - Sustainability Appraisal

**DM33 Safe, sustainable and active travel**

**Q1. In the absence of any reference to trams, cars and other forms of transport, would the policy be effective?**

1. CPP1 Policy CP9 Sustainable Transport addresses all key forms of transport in the city. Policy DM33 is specifically intended to address ways of supporting safe, sustainable and active travel through the development management process and is effective in doing so, and should be considered alongside other policies which refer to or relate to other forms of transport. The purpose of the policy is to build on CP9 to support the provision of alternative modes of transport to cars for some journeys, especially those over short distances.
2. Brighton & Hove does not have a tram system and there are no plans to implement one. It is therefore considered unnecessary to include references to trams in DM33. Any future development of a tram network is outside of the scope of CPP2 and would be addressed through the Local Transport Plan and other transport strategies.

**Q2. Is the requirement for universally accessible cycle facilities clear and unambiguous? What is the justification for the requirement for all development to provide a specific range of facilities to encourage and enable cycling? Would the requirement generally accord with NPPF paragraph 106D?**

3. The supporting text to the policy at paragraph 2.253 clarifies the requirement for ‘universally accessible’ cycle parking. It states that an element of the provision should be for non-standard cycles, defined in footnote 64 as those which do not easily fit into standard cycle racks, for example tricycles. Further clarity is proposed through a modification:

MM##	Policy DM33	<p><b><i>Policy DM33</i></b>  <i>Amend footnote 64 to read:</i></p> <p>“Non-standard cycles are those which do not easily fit into standard cycle racks, for example tricycles <u>and cycles for those with disabilities.”</u></p>	<p>To clarify that ‘non-standard cycles’ includes cycles designed for those with disabilities.</p>
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4. The requirement for the provision of supporting facilities listed in 2(e) accords with NPPF paragraph 106d as these are important in making cycling an attractive choice for a wider range of people. They form an integral part of cycling infrastructure networks and are particularly important for encouraging cycling for non-leisure purposes. However, it would not be appropriate for the types of facilities listed in the policy to be provided in all

developments. The Council therefore proposes a modification to clarify this as follows:

MM##	Policy DM33	<p><b>Policy DM33</b>  <i>Amend criterion 2(e) of the policy to read:</i></p> <p>3) <u>where appropriate</u> make provision for high quality facilities that will encourage and enable cycling <u>including such as</u> communal cycle maintenance facilities, workplace showers, lockers and changing facilities;</p>	<p>To clarify that such facilities are not required to be included within all developments.</p>
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**Q3. Should the policy include a specific requirement for street trees along cycle routes? In light of their benefits should this policy provide more effective support for street trees along cycle routes?**

5. CPP1 Policy CP13 Public Streets and Places sets out the measures to be incorporated when the city’s public realm is improved. It includes a specific reference to transport schemes which would include the development of new cycle routes. Criterion 6 of this policy sets out a requirement for the incorporation of street trees and biodiversity wherever possible. Policy DM22 requires development proposals to “*retain, improve and wherever possible provide... trees as part of the development.*” These policies are considered to be effective support for street trees along cycle routes. The purpose of Policy DM33 is instead to ensure that cycle infrastructure is safe and accessible.

**Q.4 Should the policy or supporting text refer to any other recent relevant national and local documents?**

6. Yes. Two recent government publications: "*Gear Change A bold vision for cycling and walking*" and "*Cycle Infrastructure Design, Local Transport Note 1/20*" were published after the Proposed Submission CPP2 was agreed for consultation and representations were received requesting that reference is made to them. Their importance is acknowledged and main modification (MM40) has been proposed to include a reference to them in the policy supporting text.
7. The Council also considers that reference should be made to “*The Guide to Inclusive Cycling*” (Wheels for Wellbeing, 2020) as this document provides useful, relevant guidance for accessible cycling. MM40 to be amended as follows (see highlighted text):

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**4<sup>th</sup> October 2021**

MM40	Supporting text to Policy DM33, paragraph 2.253 page 100	<p><b><i>Policy DM33 Safe, Sustainable and Active Travel</i></b></p> <p><i>Add sentence to end of paragraph 2.253:</i></p> <p><u>In providing new infrastructure for cycling and walking, applicants should also take account of 'The Guide to Inclusive Cycling' (Wheels for Wellbeing, 2020), national guidance in 'Cycle Infrastructure Design (Local Transport Note 1/20)' and 'Gear Change; A bold vision for cycling and walking', in addition to the council's Local Cycling and Walking Infrastructure Plan.</u></p>	To include reference to important and relevant new national and local documents.
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**DM34 Transport interchanges and DM35 Travel plans and transport assessments**

**Q1. Does policy DM34 provide appropriate support for a park and ride facility?**

8. Yes. CPP1 CP9.A.1.b provides support for informal park and rides on existing large car parks on the periphery of the city. DM34 facilitates the provision of purpose-built and strategic transport interchange facilities where they would help to reduce traffic congestion across the city and are suitably located and designed. It recognises that in order for such a facility to be effective in its purpose of tackling the problem of city centre congestion, it must be appropriately located with a complementary city centre parking strategy.

**Q.2 In general terms would the policies be justified, effective and consistent with national policy? Is it clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?**

9. Yes, the policies are considered effective, justified and in compliance with national policy by supporting the overarching theme of Chapter 9 of the NPPF to promote sustainable travel. DM34 supports the provision of infrastructure to improve the effectiveness and efficiency of transportation networks and reduce congestion, in line with NPPF paragraph 105.
10. DM35 specifically requires appropriate measures to be incorporated into development proposals to support sustainable modes of transport. Parts (2) and (3) build on NPPF paragraph 113 to provide clarity on the council's approach to the production of Transport Assessments/Statements. This is

in line with the PPG<sup>1</sup> that states that local authorities should take into account various considerations in determining whether a Transport Assessment or Statement will be needed.

11. The policies are clearly written and unambiguous, however it is considered that part (3) of DM35 could be improved in this regard through the following proposed modification:

MM##	Policy DM35, page 104	<p><b><i>Policy DM35 Travel Plans and Transport Assessments</i></b></p> <p><i>Amend the second sentence of part (3) to read:</i></p> <p>Where Transport Statements or Transport Assessments are required for developments elsewhere, as set out in criterion (1), <u>the likely traffic impacts within AQMAs should be considered and agreed with the council in order to determine</u> <del>considered to inform decisions about</del> whether an AQA is required.</p>	For added clarity
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### **DM36 Parking and servicing**

**Q.1 Would the parking standards set out in appendix 2 of the Plan, accord with NPPF paragraph 107? Are they justified and would they strike the right balance between providing appropriate levels of car parking spaces and promoting sustainable forms of travel in areas with good public transport accessibility?**

12. Yes, the parking standards accord with NPPF paragraph 107. Different standards are set out for different areas of the city to reflect differing accessibility including consideration of key public transport corridors; there are different standards for different types and uses of development; and requirements for electric vehicle charging are also included. The nature and characteristics of Brighton & Hove in terms of accessibility, land use and density of development influenced the zonal approach to parking standards.
13. The Parking Standards SPD (OD07, page 6) explains at section 2 (page 5-6) the evidence that supported the different zones. Research and analysis of census data, public transport accessibility mapping and testing of the standards was undertaken to inform the production of the standards. The standards for each land use in the three zones were developed through two stages of SPD consultation.

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<sup>1</sup> Paragraph: 013 Reference ID: 42-013-20140306

**Q.2 In referring to any subsequent revisions to the parking standards as set out in appendix 2, would the policy be justified and effective?**

14. The current parking standards set out in Appendix 2 will form policy once CPP2 is adopted. As an update to an SPD cannot change a policy requirement, any change to the policy must be brought forward by a formal review of the Plan. Main modifications MM42 and MM43 have been drafted to reflect this.

**Q.3 Does the policy provide appropriate support for car free developments in general?**

15. Yes. Brighton & Hove has relatively low car ownership levels compared to other UK towns and cities and the idea of not owning a car is quite familiar to many people working and living in the city. In addition to the potential transport and air quality benefits that car-free housing brings there are wider advantages as developers can provide higher densities as the land set aside for parking can be used to provide additional floorspace or enhancements to amenity space within developments.

16. The policy strikes a balance between supporting residential developments with no provision for on-site parking where appropriate, whilst recognising that in some locations providing parking will be necessary, for example if there is no convenient access to public transport. The issues that will be taken into consideration are summarised in supporting text 2.269: the scale and type of development, accessibility to sustainable transport modes and capacity for on-street parking in the immediate vicinity of the site and in the surrounding area. Further detail is set out in OD07 (pages 6-7).

17. Suitable levels of on-site disabled-user car parking must still be provided for the likely users of car-free developments.