

**Extracts from the PAC report illustrating the interrelationship between the LDP
the emerging TP and reliance on aspects of the Car Parking Strategy and
Action Plan (2018)**

3.73 During the course of the public hearing sessions BCC provided a copy of its “Car Parking Strategy and Action Plan” published in May 2018 (MA003.B). It said that Technical Supplement 14: “Transportation” (TS 14) (SD006E) sets out the vision and objectives of the car parking strategy. This has informed the policy approach for a number of the policies within the dPS, including Policy SP7 and the operational policies such as Policy TRAN8 - Car parking and service arrangements and Policy TRAN9 - Parking standards within areas of parking restraint. These issues are considered in further detail within the transportation section of this report. However, at a strategic level, we are satisfied that regard has been given to this strategy in the evidence base of the dPS.

3.74 In our consideration of the issues raised in respect of Policy SP7, including representors’ comments addressed in BCC’s Public Consultation Report (SD006) at pages 68 – 65, we consider that it is sound.

7.38 As preparatory work for the dPS, BCC in consultation with DfI, undertook a baseline analysis. This is set out in “The Submission Topic Paper 2015 – Transportation Baseline” (SD006C). The purpose of this document was to consider the proposed growth figures set out in the dPS and provide an up to date position on growth potential based on a robust planning assessment. Paragraph 1.2 of this document notes that DfI had stated that it would undertake a transport study, as part of a parallel approach to developing the dPS. As the plan process progressed, work relating to the DfI transport study fell behind schedule. In the absence of the new Transport Plan/Study, BCC said that it continued to work with the current BMTP 2004, alongside existing policy documents including: the RDS; the SPPS; and PPSs. It also participated in the different transport studies with DfI. These studies included: the Belfast City Centre Transport Framework 2017 - 2020, June 2017 (MA003.D) and the published “Belfast Car Parking Strategy and Action Plan” in May 2018 (MA003.B). Copies of these documents were provided during the hearing sessions as Matters Arising.

7.39 Paragraph 10.2 of The Submission Topic Paper 2015 – Transportation Baseline (SD006C) also notes that the Sustainability Appraisal considered all relevant transport implications of the dPS policies with a clear view to delivering sustainable patterns of development in order to reduce the need to travel and prioritise active travel and public transport. This included the correlation between location of new homes and subsequent impact on existing infrastructure. The evidence base has therefore considered relevant alternatives.

7.40 Since publication of the dPS, “The Belfast Metropolitan Transport Plan – Transport Study” (BMTP TS) was published in October 2020. A copy of this and associated documents were provided by BCC during the public hearing sessions of the IE (MA010.A, MA010B & MA010.C). Paragraph 1.1.1, of the BMTP TS, states that the purpose of the transport study is to undertake transport modelling to understand the potential effects of different transport measures that might be considered to support the future development for the LDP period to 2035 in the BMTP area.

7.41 Concerns were raised that the transportation policies in the plan have been formulated without taking account of the BMTP TS. At the public hearing sessions of the IE it was stated by the representor that BCC had always known that the transport

study was required and that it took a risk by proceeding to publish the dPS. The BMTP 2004 is out of date as it falls short in providing spatial detail in how to take account of the growth proposed by the dPS in terms of managing congestion in the city. The concern therefore is that by not taking account of the most up to date BMTP TS, the evidence base in the preparation of the dPS, is undermined.

7.42 Considering the evidence base, both written and oral, there is no dispute that BCC was not aware of the intended publication of the BMTP TS. BCC reiterated that the purpose of the dPS is to set out strategic policies for the implementation of its objectives; therefore, there was no requirement for the spatial detail contained in the BMTP TS to be included at this stage of the two-part plan process. Furthermore, as summarised at paragraph 10.3 in The Submission Topic Paper 2015 Transportation Baseline (SD006C), as statutory consultees in the development management process, a significant number of infrastructure requirements have already been considered by the relevant infrastructure providers through direct consideration of individual proposals prior to planning applications being approved. The evidence base indicates that DfI must already have had an appreciation of the likely impacts and significance of the planned growth for the city given some 19,000 housing units are ready committed i.e. with extant approval (paragraph 4.12 of TS 2).

7.43 The evidence base indicates that, at the time of formulating the policy, BCC had regard to the extant transport plan, relevant guidance, baseline analysis, accessibility studies and transport studies including recent assessments embodied in the Belfast City Centre Transport Framework 2017-2020. BCC noted its statutory duty to work with DfI in the publication of transportation policies. However, holding back the publication of the dPS until October 2020 whilst awaiting the publication of BMTP TS would have had a significant knock on impact, of almost 2 years, on the timetable BCC's programme for the production of the LDP. At page 349 of the Public Consultation Document (SD006) BCC states it was hoped that the dPS would be developed in parallel with the review of the BMTP or a new transport strategy which would commission parking studies by DfI to assess the potential to extend/amend areas of parking control and parking restrictions. As this was not possible, any proposed refinement or further designations would be appropriately addressed at the LPP stage of the process.

7.44 The two stage plan process does not close the door for BCC to take account of the measures stated in BMTP TS. Now that it issued in final form, the policies and guidance therein must be taken into account when BCC prepares the LPP. Whilst it is unfortunate that the BMT TS was not published in parallel with the dPS, BCC proceeding to issue the dPS without the publication of this document does not fundamentally undermine the evidence base used to inform its transportation policies. The evidence base robustly demonstrates that updated information such as the Belfast City Centre Transport Framework 2017 -2020, June 2017 (MA003.D) and the published "Belfast Car Parking Strategy and Action Plan" in May 2018 (MA003.B), along with regional and strategic policies have been taken into account in the formulation of the transportation aims and policies in the dPS.

7.50 At page 349 of the Public Consultation Report (SD006) BCC recognised the role of parking management in influencing modal shift and encouraging the use of more sustainable travel. Nonetheless, it is the statutory role of the Department to deliver transportation infrastructure projects and initiatives such as public transport enhancements, Park & Ride and Residents' Parking Schemes. These will be key to delivering future modal shift and, in particular, discouraging the adverse impacts of commuting into the city by single occupancy vehicles. The transportation policy aims are not unsound because they do not make such provisions.

7.68 The dPS does not include site-specific zonings therefore it is not necessary for this policy to provide accessibility analysis in the location and design of development, as directed by Planning Policy Statement 13 Transportation and Land Use (PPS13). BCC said at page 363 of the Public Consultation Report (SD006) that under the two-tier LDP process, more detailed analysis of transport impacts associated with specific sites will be carried out at the LPP stage. This approach is consistent with soundness test CE1. Subject to RA53 – RA55 inclusive, Policy TRAN7 as written is sound.

7.69 BCC pointed to an “error” in the wording of Policy TRAN8 – Car parking and servicing arrangements whereby the reference in the third paragraph of the policy headnote to “the DfI’s published standards” should be changed to “the published standards” This RA56 is necessary In order to comply with soundness test CE3.

7.70 Paragraph 6.301 of the SPPS lists transportation issues to be address in the LDP. Car parking is one such. The headnote of Policy TRAN8 states that the emphasis will be to allow parking provision that will assist in reducing the reliance on the private car in particular commuting into the city, help tackle growing congestion and bring about a change in travel behaviour. This takes account of the regional strategic objectives to promote parking policies that will assist in reducing reliance on the private car and help tackle growing congestion.

7.71 The headnote of Policy TRAN8 also states that the precise amount of car parking for development proposals will be determined according to the specific characteristics of the development and its location having regard to the published standards or any reduction provided for in an area of parking restraint (Policy TRAN9). This permits flexibility to consider proposals in respect of their site-specific characteristics. For sites beyond areas of parking restraint, the headnote of Policy TRAN8 also builds in flexibility for a reduced level of car parking subject to circumstances set out in criteria a. to e. The policy, as worded, does not prevent car-free residential developments in appropriate locations. Guidance contained in “Creating Places” is not superseded by the policies in the dPS and would still be a material consideration. Promoting reduced car parking requirements recognises the role of car parking in influencing a modal shift and encouraging the use of more sustainable travel forms. Accordingly, no amendment of the policy is required for a flexible approach when considering development proposals.

7.72 Paragraph 9.4.31 of the J&A text states that the priority is to ensure that car parking policies and provisions do not incentivise the use of the car over the use of sustainable transport modes. This approach does not need to go any further as it takes account of the regional strategic objectives and the issues that the SPPS indicated at paragraph 6.301, bullet 6, should be included in an LDP. The approach does not contradict the incentive to move away from the use of the car over the use of sustainable transport modes. The wording of paragraph 9.4.31 is sound.

7.77 At page 368 of the Public Consultation Report (SD006) BCC stated that policies from PPS 3 and PPS 13, in addition to work done creating policies for BMAP, have all been taken into account and have contributed to the creation of Policy TRAN9 - Parking standards within areas of parking restraint. We agree that this satisfies the requirements of soundness test C3.

7.78 The dPS does not contain specific zonings for areas of parking restraint. BBC stated, at page 369 of the Public Consultation Report (SD006) that this will be carried out at the LPP stage of the plan process. In doing so, BCC will build on existing

evidence to zone areas of parking restraint. This is a coherent and effective approach to this policy.

7.79 Policy TRAN9 does not prevent car-free residential developments in appropriate locations. The issue of higher density development proposals with no car parking spaces would be a matter to be considered on a site-specific basis through the development management process.

7.80 Supporting good design and positive placemaking is a core planning principle of the SPPS. Policy TRAN10 - Design of car parking takes account of this as it says that a high standard of design, layout and landscaping to accompany all proposals for car parking will be expected. A representor said that multi-level and basement car parking, the building must have an active frontage at street level. Policy DES1 - Principles of urban design provides criteria to consider: the design and appearance of new development; promotion of uses that provide active frontages; and inclusive design that supports safety in order to reduce crime and anti-social behaviour. It is not necessary that the dPS repeats detailed design criteria specific to car parking in the transportation policies. The plan should be read in the round.

7.81 The Belfast Agenda recognises and is committed to the increased use of cycling and the expansion of the Belfast Bikes Scheme. Whilst the expansion this Scheme could fill gaps between the park and ride facilities and the city centre it is not the remit of the LDP process to make this provision.

7.82 A regional strategic objective for transportation, as stated at paragraph 6.297 of the SPPS, is to promote parking policies that will assist in reducing the reliance on the private car and help tackle congestion. The “Belfast Car Parking Strategy and Action Plan”, April 2018 (MA003.B) recognises the role of car parking to the success of the city. The rationale for the Strategy is to ensure that parking supports the local economy by making it easy for shoppers and tourists to visit Belfast and provide access to key services and facilities for special needs groups and the mobility impaired. The “Belfast Car Parking Strategy and Action Plan” sets out a vision for Belfast along with four objectives. At the time of drafting the dPS, the Car Parking Strategy and Action Plan was a draft document and has since been adopted. However, at paragraph 3.30 of TS 14, BCC said that its recommendations have been used as evidence for drafting policies in the dPS relating to car parking. The plan has had regard to this Strategy.

7.83 Policy TRAN11 - Provision of public and private car parks is in line with one of the regional strategic objectives of the SPPS for transportation and land-use planning and has regard to the objectives of the “Belfast Car Parking Strategy and Action Plan”. The policy relates to provision of the development of new car parking and not to existing car parking provision in Belfast. The dPS recognises that car parking in suitable amounts and locations is vital for the city centre to function properly but that a balance is necessary between car parking and other transport modes and also between the needs of short stay and long stay parking users. Car parking provision for development types will be assessed on the site-specific merits of a scheme and its location. In order for the policy to be sound, it is not necessary that the dPS stipulates the form and type of car parking.