

Parking Supplementary Planning Document

Consultation Statement

1. Introduction

Birmingham City Council consulted on the Parking Supplementary Planning Document (SPD) in January and February 2020. The consultation ran simultaneously with consultation on the publication version (regulation 19) of the Development Management in Birmingham Development Plan Document (DMB) to provide clarity on the connectivity policies in the DMB.

This statement details the level and type of responses received to the Parking SPD proposals and how they will be addressed in a revised version of the document. The statement has been prepared in accordance with Regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the Birmingham Statement of Community Involvement.

2. Purpose

The Parking SPD will replace the existing Car Parking Guidelines SPD (2012). Revised parking standards are required to reflect new national guidance and support the delivery of the Birmingham Development Plan as well as wider air quality and climate change objectives. The SPD also sets out a coherent and equitable parking strategy for the city.

Public consultation was carried out for 7 weeks from 9th January 2020 to the 28th February 2020, when views were sought from stakeholders and the public on the proposed guidance within the document.

3. Engagement approach

The draft SPD and supporting documents were uploaded onto the City Council's consultation website BeHeard with a structured survey inviting comments on each section of the document.

There was extensive publicising of and engagement on the consultation through a variety of channels:

- A press release

- Numerous posts on the City Council's social media channels (including Birmingham Connected communications),
- The councils email bulletin and website
- Letters sent to all specific and general consultees (required by the relevant regulations) identified in the Planning and Development Consultation Database, including:
 - o Developers and agents
 - o Sustrans
 - o Cycling and walking stakeholders groups, charities and clubs
 - o Community groups
 - o Emergency services
 - o Public transport operators
 - o Neighbourhood forums
 - o Ward councilors
 - o Members of Parliament
 - o West Midlands Combined Authority
 - o Neighbouring Local Authorities
 - o Chambers of Commerce
 - o Greater Birmingham and Solihull Local Enterprise Partnership
 - o Disability User Groups
- Attendance at various transport events including Birmingham Transport Plan workshops, Calthorpe Residents Transport Conference, and the Birmingham Transport Summit.

Links to examples of engagement material are available below:

Be Heard: <https://www.birminghambeheard.org.uk/economy/parkingspd>

Website link:

https://www.birmingham.gov.uk/info/20109/parking/2045/draft_birmingham_parking_supplementary_planning_document_consultation

Press release:

https://www.birmingham.gov.uk/news/article/490/draft_sustainable_parking_strategy_set_for_consultation

4. Responses

In total 225 responses were received to the consultation, including 198 responses from individual citizens and 27 from groups or organisations. This included 943 individual comments within the online response and further written representations received by letter and email. All of the feedback has been analysed to establish how the SPD draft should be amended before taking it forward for adoption.

Summarised responses and proposed changes are provided in Appendix A, Organisational comments and Appendix B Individual Citizen Comments.

Internal comments have also been received and these have been reflected in the amendments to the SPD.

Key comments include:

- Concerns about impact of parking removal on the city centre economy, particularly leisure and the night-time economy as there is a lack of alternative provision to private car at off peak times.
- Some felt that motorists were being targeted too much. Parking levels should be increased.
- Public transport is not good, safe or reliable enough to offer a viable alternative to car travel. Public transport should be improved first before reducing car travel.
- Proposed measures will put more pressure on edge of city where already congested.
- New developments provide too little parking which has led to on-street and pavement parking.
- Objection to maximums set on residential car parking provision in Zone C.
- General support for management of residential parking and preventing commuter parking blocking residential streets.
- Some felt that the city should remove the option of car use entirely to end car culture.
- Parking in the city centre (particularly on street) should be substantially reduced/banned.
- Support high density housing with zero parking to meet housing need. Developments close to rail stations should be zero parking and high density.
- Strong support for additional park and ride provision, although some felt it encouraged short car journeys and is not appropriate.
- Some responses did not recognise station car parks as park and ride provision and feel the city requires dedicated bus park and ride provision close to the city centre.
- Concerns regarding the management of commuter on-street parking in residential streets around stations. Requests for additional enforcement of this and some requests for expansion of station car parks.
- Concern regarding parking levels outside schools and strong support for encouraging walking. Requests for parking to be completely banned/ strongly restricted in the vicinity of schools.
- There should be more consideration of disabled drivers/ Blue Badge Holders and those with mobility issues. Concern regarding any removal of blue badge parking

bays. A number of people raised concerns about those who have mobility difficulties, but do not necessarily have a blue badge.

- Parking provision for powered two wheelers (motorcycles) should be better quality, more secure and close to/visible from key destinations.
- Pavement parking should be addressed/ banned.
- Kerbside waiting and idling vehicles should be addressed/banned. Particular concerns raised regarding taxis idling near stations.
- Better parking enforcement is required.
- More provision is needed for rapid Electric Vehicle (EV) charging on street.
- A number of responses feel that provision for cyclists is too low/unambitious and should match Birmingham Cycle Revolution aspirations for future levels of cycling.
- Changing and shower facilities for cyclists should be provided in developments with a large number of staff.
- More provision for residential visitor parking should be made.
- Car parking for educational uses should be increased.
- Places of worship in Zone A and retail uses in Zone B have not got high enough parking provision.
- Concern about the viability implications for development and the lack of evidence to justify EV charging requirements.
- Controlled parking is generally supported as a way to manage high demand for on street parking, but some comments said additional charges should not be made for this, whilst others questioned whether further controlled parking would be rolled out extensively.
- Flexibility should be built into the SPD so that applicants can justify an alternative level of parking, where there are legitimate reasons for doing so.
- Clarity needed on how the zone boundaries and parking standards are set.

In response to internal BCC comments, the SPD has been further refined in the following ways:

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- 1.1 A detailed response to each comment and how the issues raised have been addressed in the SPD has been set out in appendices A and B. All responses received have been analysed and considered in the preparation of the final SPD. This has led to some changes to the initial draft documents. In summary the key changes include:

- Zone A (city centre) will remain disabled user parking only. However, it is acknowledged that in some instances parking may be required for staff/visitors e.g. where developments are predominantly used at off-peak times when public transport availability is lower. A 10% maximum of total staff/visitors will be set, where clear justification can be evidenced.
- Maximum car parking standards will remain for Zones A (city centre) and B (urban centres). Zone C (suburban/ residential) car parking standards for residential developments will be an 'expected level of provision' to comply with national planning policy. Accordingly, the values for the residential parking standards have been lowered.
- A simpler approach has been taken to allocated and unallocated parking with worked examples provided. The approach to residential parking provides for visitor parking.
- Adjustment of the car parking standard for large retail development to ensure adequate provision in Zones B and C. Zone A will remain disabled user parking only.
- Cycle standard for educational uses has been increased to 1 space per 10 staff plus 1 per 10 pupils (from 1 per 20 in the draft).
- A requirement has been added for all developments of 40 or more staff to provide adequate shower and changing facilities.
- Staff car parking provision for Primary and Secondary schools in Zone C (suburban) to increase from 1 per 2 staff to 1 per 1.5 staff acknowledging the need for staff to travel with books/ equipment etc. in less accessible areas of the city. Similarly, the parking maximum for nurseries in Zone C has been increased from one space per 8 children, to one space per 4 children.
- Further guidance and consideration have been given to motorcycle parking in the SPD.
- Additional text relating to how the standards will be flexibly applied has been incorporated.
- Further detail on how the zones have been determined has been included.
- Strengthening of proposals around disabled parking to ensure that appropriate levels of provision are available in the city centre and local centres.
- Clarification regarding application of standards to detailed and reserved matters planning applications which are registered prior to adoption of the SPD
- Greater emphasis of the modal split of journeys into the city centre.
- Additional detail regarding development on and operation of the canal network.
- Greater emphasis on the benefits of active travel and how this can be supported through parking policy.
- Additional detail regarding provision for fleet vehicles
- Amendment of parking standards for different types of supported residential accommodation (such as C2 Extra Care and C3 Sheltered accommodation).
- Greater reference to design guidance and the Draft Birmingham Design Guide

Appendix A

Draft Parking SPD – Summary of organisations’ comments and Council response

Rep ID	Name	Main Issues raised	Council response and how issues have been addressed
GENERAL (NON-TOPIC SPECIFIC)			
G1	Argent LLP	<p>Generally supportive of the SPD, however, would welcome confirmation and clarity as to how the Council will approach schemes which already benefit from outline planning permission with well-established parking allowances. The SPD should ensure that there is a degree of flexibility to allow the Council to consider the requirements of ‘special’ cases and ensure continuity across major schemes, particularly where applications for different phases of development will be determined and delivered within differing policy contexts.</p> <p>Suggest that the SPD recognises there will need to be a ‘transition period’ for developments which will be determined and delivered in the short to medium-term during, or shortly after, the adoption of the new standards.</p>	Additional text has been added to clarify that the standards will not apply to detailed and reserved matters applications that are already registered prior to the date of adoption of the SPD. The SPD will have flexibility to allow the Council to consider the requirements of ‘special’ cases for example major schemes which are phased over long periods of time.
G2	Argent LLP	Where public transport infrastructure / improvements are planned but have not yet been delivered, the Council should recognise that there may be a requirement for parking in the short-term. Parking management plans could then be used to ensure these spaces are efficiently utilised and can be re-used for other purposes once areas	Guidance and standards have been aligned to existing public transport infrastructure and only take into account transport infrastructure delivery projects which are timetabled for delivery within 3 years. Therefore, unless very short-term parking requirements can be demonstrated, prior to this 3-year timescale, the standards in this SPD should already be appropriate to existing

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		are sufficiently served by public transport.	<p>public transport service.</p> <p>Without strong enforcement capabilities, there is a risk that short term parking provision may become permanent and affect trip generation, reduce public transport uptake, and network management.</p> <p>The SPD has been amended to account for delayed public transport infrastructure schemes, only in relation to those which have been identified for delivery within the next 3 years.</p>
G3	Argent LLP	Argent welcomes the inclusion of suitable caveat from a feasibility/ viability perspective in regard to the provision of car club bays.	Support noted.
G4	Push Bikes & Bike West Midlands Network	More should be made of the fact that the overwhelming majority of people visiting the city centre do not come in a car - it is important that we provide an efficient transport system for that majority, rather than giving an unfair share of highway space to people in their own cars.	Agree the modal split of visitors to the city centre should be highlighted. The SPD has been amended to include more emphasis on modal split of visitors to city centre.
G5	Bloor Homes	Support residential parking being given a 'high priority' in predominantly residential areas but parking opportunities elsewhere should not be unnecessarily restricted. In certain areas access to public transport is problematic for a variety of different reasons. Car parking must be made available in order to allow people to commute efficiently throughout the city.	There is strong evidence that restricting parking at destinations reduces car usage, supported by good public transport connectivity and local parking enforcement/management. Whilst car ownership and provision at 'origin' may be appropriate, in locations with good transport connectivity, it is necessary that parking provision is limited to essential requirements at destinations so as to reduce impact on the transport network. Where public transport connectivity is more limited, parking standards are higher.
G6	Canal and River Trust	In order to achieve a reduction in private vehicle usage, there should be a robust policy basis that seeks the requirement to provide suitable alternatives. We seek to	The promotion of sustainable travel is included within policies in the Birmingham Development Plan (BDP) notably TP38 Sustainable Transport Network, TP39 Walking, TP40 Cycling, TP41 Public

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		<p>promote the use of our network for sustainable travel. New developments should:</p> <ul style="list-style-type: none"> • Provide or contribute towards signage & wayfinding of alternative, sustainable travel routes • Provide or contribute towards improved access points onto the canal network (including signage/wayfinding) • Provide or contribute towards enhancing the quality/longevity of the canal network • Promote the existence and opportunities of the network of canal routes to staff, residents, visitors etc. (as appropriate to the type of development) • Where sites are located adjacent to water space, parking provision should be screened from view from the canal corridor, ideally by being located behind natural screening, boundary treatments or built form • Raise awareness of the options for using the canal network as part of a longer journey, for example to lead to/from public transport hubs. <p>Our network should be included and suggested for use where appropriate (real time data) to assist with wider travel network management. Installation of cameras/counters or other infrastructure should also be a requirement of developments where appropriate and necessary.</p>	<p>Transport, PG3 Place making.</p> <p>Canals are recognised as important part of the cycling network in TP40 Cycling which promotes cycling through further development and enhancement of an extensive off-road network of canal towpaths and green routes; wayfinding and improved direction signing; and ensuring that new development incorporates appropriately designed facilities which will promote cycling as an attractive, convenient and safe travel method.</p> <p>Canals are a heritage asset and the historic importance of canals is very much recognised in the BDP under TP12 Historic Environment which states:</p> <p>“The historic importance of canals is acknowledged, and important groups of canal buildings and features will be protected, especially where they are listed or in a Conservation Area. Where appropriate the enhancement of canals and their settings will be secured through development proposals.”</p> <p>However, text has been added to the SPD to reiterate the importance of the canal and river network as part of our transport network.</p> <p>The draft Birmingham Design Guide also include detailed design guidance on development adjacent to canals. It recognises that canals provide a multi-functional resource that can act as a catalyst for regeneration and provides a network of spaces serving as travel routes, locations for sports, leisure and cultural activities, and ecological and biodiversity habitats and corridors. Design Principle 21 sets detailed guidance relating to developing adjacent to water assets.</p>

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			The Design Guide also sets out detailed guidance on parking design. This includes minimising and managing car parking, ensuring it does not dominate. Comments regarding parking design have been relayed to the Design Guide consultation for consideration.
G7	Canal and River Trust	Keen to minimise any potential negative impacts on our operations teams and the way they work to maintain the network, including providing access to the network for maintenance vehicles and equipment. Such requirements should be taken into account where parking restrictions are to be applied or provision removed in close proximity to the canal network. It should be identified as a potential requirement of developments near water that maintenance access must be retained/provided as necessary.	The SPD has been amended to take to consider the impact of parking restrictions and development on the operation of the canal. Comments have also been relayed to the Design Guide consultation for consideration.
G8	Canal and River Trust	Where development proposals could impact on existing/future parking provision or travel options for boaters, there should be a requirement for this to be considered and adequately addressed in development proposals.	The SPD has been amended to take to consider the impact of parking restrictions and development on the operation of the canal. Comments have also been relayed to the Design Guide consultation for consideration.
G9	Canal and River Trust	Whilst supportive of requirements for bus/coach parking spaces to be provided relative to some types of developments such as destinations and attractions, we are keen to ensure that this is proportionate and includes consideration of context and likely need, to ensure that it does not preclude potentially beneficial economic development.	Standards are given as guidance to ensure bus/coach parking is accommodated where relevant and appropriate. It will not be imposed in locations where it is not required.
G10	Canal and River Trust	Measures should not reduce the attractiveness of city centre accommodation, in order that gaining rental	Proposed measures are not considered likely to reduce attractiveness of city centre accommodation as they support a cleaner, greener,

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		income does not become less likely or successful.	more people-friendly living environment.
G11	Canal and River Trust	The document refers to the intention to have a city-wide cycle hire scheme and the Trust would also like to be consulted on this project as it develops.	Noted. The Council will pass this request on to appropriate officers leading on the scheme in TfWM.
G12	Canal and River Trust	Advice on the design of various infrastructure requirements, such as cycle parking, disabled spaces, EV charging points etc This should also identify that when near the canal network, there may be additional considerations such as barriers preventing vehicles from entering water, screening, signage, lighting etc.	Detailed guidance on parking design is contained in the draft Birmingham Design Guide. Relay comments to the Design Guide consultation.
G13	Canal and River Trust	Facilities for cyclists/runners etc such as shower/changing provision support and encourage the use of sustainable travel modes and a lack of them can result in a barrier to sustainable travel. The document should be more robust in requiring their provision and detailing when/why they are required as an alternative to providing parking.	Additional guidance has been included in the SPD in relation to the thresholds and types of development which will be expected to include shower/ changing facilities
G14	Canal and River Trust	Water borne transport options should also be included as a requirement for consideration on sites in close proximity to the canal network. This could include a requirement for future-proofing of infrastructure such as providing services (power, water & mooring bollards) to the canalside for future infrastructure provision such as water bus stops.	The draft Design Guide encourages developments adjacent to waterways to enhance them and their functions; benefiting occupants and the wider users of the network. Refer comment to the Design Guide consultation.
G15	Historic England	No specific comments to make on the draft Parking SPD. Cycle stands, painted on-street bay delineations and EV charging points have the potential to impact on the historic environment, heritage assets and their setting. We look forward to seeing the Council's Design Guide as it	Noted.

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		progresses.	
G16	Langley Sutton Coldfield Consortium	The Consortium objects to the approach taken within the emerging Parking SPD which requires all development within Zone C to have a “blanket” imposition of maximum car parking standards. This is considered to be contrary to the requirements of paragraphs 105 and 106 of the National Planning Policy Framework	The Council acknowledges the requirements of para 106 of the NPPF and has reviewed the imposition of a maximum standard in Zone C. The SPD has been amended to remove the imposition of a maximum standard for residential and non-residential development in Zone C.
G17	Sport England	There should be reference in the document to the benefits of active travel to the physical and mental health and well-being of Birmingham's citizens. This should be visible within overall Vision and Principles, and also within the Parking Strategy.	The benefits of active travel are already emphasised in the BDP, Birmingham Connected, the draft Birmingham Transport Plan, and the Walking and Cycling Strategy but agree that this can be reiterated in the SPD.
CITY CENTRE PARKING			
CC1	Argent LLP	Supportive of the caveat included for hotel and residential uses, which allows for standard parking spaces to be provided if a clear need can be demonstrated. Query why a similar caveat has not been included for office developments?	The approach to providing a caveat for certain developments has been reviewed and no specific land-use is now referenced. The guidance will allow for a departure from the standards where fully and appropriately justified.
CC2	Push Bikes & Bike West Midlands Network	We support the aim to remove all no-fee on-street car parking, but we think that on-street parking, other than for disabled users, should be fully removed. Only disabled users should have a need to park on the street other than for loading and unloading.	Support noted. On street city-centre parking provision is significantly reducing in the city centre. It is not deemed appropriate or necessary to remove all on-street parking as this would be detrimental to local business. However should reallocation of on-street parking space be required to improve sustainable transport provision, this is likely to be prioritised and further parking will be removed.
CC3	Push Bikes & Bike West	We support the intention to not support applications for temporary car parks.	Support noted.

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	Midlands Network		
CC4	Push Bikes & Bike West Midlands Network	We support the proposal of introducing a Workplace Parking Levy. We feel that this is important for providing funds to invest in greener modes of transport and to give businesses the incentive to encourage better travel patterns.	Support noted.
CC5	Bloor Homes	<p>If restrictions are placed on parking provision in the City it must be ensured this does not adversely affect the prosperity of the City. There must, therefore, be clear evidence to demonstrate that alternative access options to the City Centre are available and achievable across the City. It is not clear if public transport infrastructure is capable of accommodating the additional public transport movements this strategy could create.</p> <p>Businesses may look to locate outside of the City Centre, or outside of Birmingham altogether if they are not served by adequate car parking or public transport connections.</p>	<p>While the right amount of parking provision can help support local business, cater for those with mobility needs and deter inconsiderate and unsafe parking, we must also ensure that valuable street space is not dominated by parked cars.</p> <p>Birmingham Connected and the draft Birmingham Transport Plan provide a clear steer for the Parking SPD in their aim create an efficient, attractive, sustainable healthy and equitable transport system by seeking a reduction in reliance on the car and supporting walking, cycling and public transport. The BTP seeks to ensure that public transport will be the preferred choice for most people travelling into and out of the city centre. There is clear evidence that the city centre is already highly accessible by public transport. This is set to further improve with investment in and extensions to bus, bus rapid transit, train and tram networks including prioritisation over private car travel to reduce the negative impact that congestion and travel disruption has on productivity. The economic costs linked to congestion are also very significant, currently costing £632 million a year. This figure is expected to rise as demand increases. There is also evidence that large businesses who are choosing to locate in the city centre are placing greater emphasis on public transport use and active travel opportunities for staff. The new HSBC headquarters in Birmingham, for example, do not provide any parking for their 2,500</p>

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			staff except for disabled spaces. The company have invested heavily in providing facilities to support cycling to work for their employees, including shower facilities and bike parking. They recognise that supporting employees to travel actively can bring significant health benefits to their workforce. (Source)
CC6	Canal and Rivers Trust	Keen to ensure that our staff are not disadvantaged by the changes to parking provision within the city, whilst acknowledging that wherever possible we seek to encourage alternative, more sustainable travel modes. Staff based in city centre offices who require a car to do their job in order to be able to react to incidents and/or carry out site visits should not be disadvantaged by these proposals.	We acknowledge the importance of provision for fleet vehicles to support necessary working practices. The SPD recognises that for some journeys and business activities travelling to the city centre by car is the most suitable, or in some cases the only viable option. Within the parking standards for new developments there is acknowledgement of the need for accommodating fleet vehicles where necessary.
CC7	Salvation Army, Birmingham Citadel	Concerns with proposal to 'roll out the city centre controlled parking programme which will remove all no fee on street parking in the city centre'. We rely on the availability of no fee on street parking for the sustainability of our worship services on Sundays and weekday evenings. The availability of free access parking outside of normal business hours offers is considered essential for the sustainability and growth of the church and its community work. It is agreed that 'a balanced approach to parking provision' is needed and that proper provision should be made 'for those with mobility needs'. Use class D1 'Halls and Places of Worship', the maximum parking provision is 1 space per 20 seats for Zone A locations. This would be woefully short of the requirement as, in common with other churches we 'generate a high	The controlled parking programme which is in place across the city centre includes different traffic regulations (and parking charges/timings) for different areas. Each parking 'zone' is designed according to the appropriate requirements for managing parking in that area, and accommodating the needs of residents, businesses and organisations where possible. It is accepted that wording regarding removal of all no fee on street parking is misleading. This will be revised to 'removal of all uncontrolled on-street parking'. In other words, whilst there will be parking restrictions put in place throughout the city centre, this does not necessarily mean that all locations will incur parking charges at all times of the day and all days of the week. Prior to the introduction of any new parking restrictions or changes, we will consult with premises in the local area and work with organisations/ businesses affected to ensure that operational needs

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		<p>level of short-term demand’. It is also noted that ‘Operational Parking’ excludes parking by operational users.</p> <p>The Salvation Army does not operate any commercial activities and therefore cannot demonstrate a loss of business, but will no doubt affect church attendance and operation.</p> <p>The document should be amended to clearly permit exceptions in cases which add – not detract – to the thriving culture of the city. If such an amendment can be confirmed, then we shall be grateful to engage in detailed discussions relating to our specific situation.</p>	<p>can still be met wherever possible.</p>
CC8	Unite	<p>Site/area specific policy should be added to enable new car parks in regeneration zones where the new parking has other ‘spin off’ benefits. The approach particularly the ‘zero parking’ position in the SPD will displace current parking problems whilst at the same time creating an obstacle to delivering regeneration. It is critical that policies to reduce the level of car parking within the city centre are brought forward alongside significant investment in public transport to ensure there are genuine travel alternatives to the private car. The emerging policies have an unintended consequence of potentially stifling innovation in the parking sector as an inability to deliver new modern car parks will mean existing car parks (which often lack low emissions / vehicle charging) will continue to be relied upon. A more robust and</p>	<p>This amendment is not considered necessary. Even in regeneration areas levels of parking provision need to be managed to limit adverse impact on the transport network, air quality and the environment.</p> <p>Existing wording allows standalone parking in regeneration areas, as long as it can be demonstrated to meet a deficit in local publicly available off-street parking or to help relieve on-street parking problems.</p>

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		<p>sustainable approach would be to encourage new state of the art standalone car parks in accessible locations on the edge of the city centre.</p> <p>The Knowledge Quarter is one such location. A master planned and strategic approach to car parking in the KQ will release existing car park sites for future development in full knowledge that essential car parking can be accommodated elsewhere within the site, which reduces overall parking numbers in the area. Therefore, a strategic approach to parking in this area could be a much needed 'release valve' which enables future regeneration. Suggest policy wording supporting provision of new standalone car parks.</p>	
CC9	Oval Real Estate	Oval fully supports the approach taken in the draft SPD to manage on-street parking in the city centre, including Digbeth. In particular, Oval welcomes the removal of on-street car parking to support improvements to public realm and to provide priority for walking, cycling, servicing and delivery.	Support noted.
CC10	Oval Real Estate	<p>Oval do not generally support this detailed guidance principle given it does not take into account any transitional arrangements, phasing and the need to deliver parking strategies over a prolonged period of time, which is sometimes the case when delivering major complex regenerative schemes in the city centre.</p> <p>It is recommended that the detailed guidance is amended to allow for flexibility in the provision of off-street parking as follows:</p>	<p>The SPD has been amended to clarify that it will not apply to detailed and reserved matters applications that are already registered prior to the date of adoption of the SPD. The SPD will have flexibility to allow the Council to consider the requirements of 'special' cases for example major schemes which are phased over long periods of time.</p> <p>Existing wording allows standalone parking in regeneration areas, as long as it can be demonstrated to meet a deficit in local publicly available off-street parking or to help relieve on-street parking problems.</p>

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		<i>"Replacement off street parking and new off street parking in the city centre will not be supported unless it can be demonstrated that there is a gap in provision and it reflects location specific circumstances."</i>	
CC11	Mcnaughton Associates	<p>A number of people need cars as a working tool to be able to visit other parts of the Midlands to carry out their job. Making it difficult for people to use cars for business or pleasure will see those people not use the city centre. People will shop in other locations. The shops are struggling in every city. If people do not use the shops, they will close. The council will lose revenue from Business Rates. Companies will move out of town. Families will not move into the city without parking. Limiting parking will destroy the economy of the city.</p>	<p>While the right amount of parking provision can help support local business, cater for those with mobility needs and prevent inconsiderate and unsafe parking, we must also ensure that our valuable street space is not dominated by parked cars.</p> <p>Birmingham Connected and the draft Birmingham Transport Plan provide a clear steer for the Parking SPD in their aim create an efficient, attractive, sustainable healthy and equitable transport system by seeking a reduction in reliance on the car and supporting walking, cycling and public transport. The BTP seeks to ensure that public transport will be the preferred choice for most people travelling into and out of the city centre.</p> <p>There is clear evidence that the centre is already highly accessible by public transport. This is set to further improve with investment in and extensions to bus, bus rapid transit, train and tram networks including prioritisation over private car travel to reduce the negative impact that congestion and travel disruption has on productivity. The economic costs linked to congestion are also very significant, currently costing Birmingham's economy £632 million a year (source: Birmingham Transport Plan). This figure is expected to rise as demand increases.</p> <p>There is also evidence that large businesses who are choosing to locate in the city centre are placing greater emphasis on public transport use and Active travel opportunities for staff - see response above to ref ID CC5 for further detail.</p>

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			<p>A city centre parking survey undertaken in 2016 showed that there is significant over-supply of parking in the city centre which represents an inefficient and uneconomic use of land.</p> <p>Provision for essential fleet vehicles will not be limited by the proposed parking standards.</p>
CC12	Clarke Print	Concern staff may have to pay for street parking and believe business may suffer as a result.	Wherever controlled parking measures are introduced the Council will consult closely with local residents and businesses to accommodate operational needs as far as is possible. Business permits are issued in many controlled parking schemes and we would refer the respondent to the Parking Control Team in this instance in regard to site specific queries.
CC13	National Express West Midlands	<p>National Express West Midlands supports the approach to city centre parking and the reduction of the need for private car journeys by ensuring viability of alternative modes. The management of parking is key to encouraging changes in travel behaviour.</p> <p>The provision of spaces in some locations encourages extra circulation of traffic. Premium space locations need to be considered carefully, with routes to/from them not using bus routes (e.g. Colmore Row).</p>	It is agreed that the approach to parking in premium locations must be carefully considered. The SPD, and the Birmingham Transport Plan state that reallocation of parking space for sustainable transport modes will be prioritised where viable. However it is also the case that a balanced approach may be necessary to ensure that appropriate provision remains for servicing, delivery, blue badge parking, and facilities such as car clubs or EV charging.
CC14	Motorcycle Action Group	We believe that motorcycle parking should be aligned with the approach adopted for cycle parking and recommend that the term single track vehicles be adopted to encompass both pedal and powered cycles. Thus providing the necessary detachment of motorcycles from cars in terms of categorisation. The "single track vehicle" term also has flexibility to encompass micromobility vehicles such as stand-on e scooters when legislation	<p>Whilst it is agreed that motorcycles and pedal cycles have similar requirements in some circumstances, and dual provision will be encouraged where appropriate, it is still considered appropriate to identify them separately rather than amalgamating all standards under 'single track vehicles'.</p> <p>The SPD has been amended to provide further guidance on provision for motorcycles.</p>

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		inevitably develops to legalise the use of these vehicles	
CC15	St Joseph Homes Ltd	<p>Concerns in terms of any future levy's eventual application and the operational aspects of such an approach. Our principle concern relates to that of the potential detrimental impact of a 'double dipping' through the CAZ and a workplace parking levy, possibly considerably impacting the viability of SMEs by prohibiting unavoidable employee or customer business trips. This could be a hindrance to the BDP's commitments to nurturing sustainable, mixed communities as only larger businesses may be able to afford the levy if it is too great. We would hope, therefore that any levy is evidence based and viable in terms of cost to the business. We request a public consultation is heard in the event that such an option is to be pursued as to better understand and inform the methodology to be employed in calculating the levy.</p>	<p>WPL investigations have been temporarily suspended in light of Covid19. Extensive impact analysis and evidence will need to be gathered to support any future decisions regarding introduction of a WPL.</p> <p>No scheme would be implemented before 2023. It is anticipated that a large proportion of vehicles would be CAZ compliant by this time. A comprehensive workplace parking study supported by a detailed parking survey would be undertaken to inform any potential levy. Engagement with employers would also be undertaken and the Council will work closely with the Chamber of Commerce and other businesses to understand the impact of the WPL.</p> <p>The Transport Act (2000) provides the enabling legislation for WPL and provides flexibility to allow exemptions and discounts to certain user groups. Exemptions relate to spaces which do not have to be licensed at all such as spaces used by a particular vehicle type e.g. motorbikes, delivery or fleet vehicles. Discounts relate to spaces which need to be licensed but are not chargeable. 100% discounts will be considered for workplace parking spaces provided for registered Blue Badge holders and small businesses who provide a low number of workplace spaces (e.g. 10 or fewer chargeable spaces).</p> <p>Formal consultation will be undertaken which will enable better understanding of any potential scheme including chargeable spaces, exemptions, discounts and levy potential. The findings of all consultations and further technical assessments will be made public and will be brought to the Council's Cabinet for consideration.</p>

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	Network Rail	As Birmingham City Council is implementing a clean air zone, Network Rail would be interested to understand what the anticipated impact is on the wider transport network, specifically any policies relating to railway station car parking.	Birmingham City Council do not have direct control over railway station car parking as this is all managed by TfWM. At present Clean Air Zone proposals have no direct impact on railway station car parking. However the authority will ensure that Network Rail are fully appraised of all potential impacts on the wider transport network from Clean Air Zone proposals.
EDGE OF CITY CENTRE PARKING			
EC1	Push Bikes & Bike West Midlands Network	The Parking SPD suggests encouraging large developments to make their parking available to the public. We suggest that large developments be encouraged to provide facilities for 'park and cycle', where appropriate, to reduce motor traffic going into the city centre and encourage more people to cycle at least part of the journey.	BCC has arranged 2 'Park, roll and stroll' sites in response to Covid 19, as part of the Emergency Active Travel measures. Options to encourage other large developments to join this, or future similar schemes will be explored. This would be more appropriate as part of our Demand Management work with all businesses, rather than through new development which is likely to come with lower parking provision in the future. Liaise with Demand Management Team regarding more long-term park and pedal opportunities.
EC2	Adlington Retirement Living	The SPD suggests that large new developments with off street parking must consider making their parking publicly accessible. The policy needs to be supported by additional information: a) what is a large development (this needs to be defined)? b) what does consideration mean? c) does consideration depend on the Use Class/nature of the Concern that some development will not have the capacity to make parking publicly accessible.	Agree that clarification is required. The SPD has been amended to clarify the definition of : a) 'Large developments' as those with more than 50 car parking spaces. b) and c)'Consideration' - developers will need to demonstrate that they have explored the practicality and viability of making their parking publicly available taking into account the use and nature of the development.
EC3	National Express West Midlands	National Express West Midlands agrees with the aim of supporting enhanced connections by public transport and with the approach outlined.	Support noted. The SPD sets out proposals for comprehensive edge of centre parking controls. A review of city centre CPZs is also underway.

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		We believe some edge-of-centre sites need parking controls to enable buses to get through, or to give decent, safe walking routes to bus corridors.	
EC4	Motorcycle Action Group	Recommend that motorcycle parking policy aligns with cycle parking policy. This is best facilitated by the definition of single-track vehicles as described in the previous question.	See response to CC14
URBAN CENTRES AND GROWTH AREAS			
UC1	Langley Sutton Coldfield Consortium	The Consortium recognises that car parking in Urban Centres and Growth Areas will need to take into account the needs of the economy, accessibility requirements and community health, safety and wellbeing considerations. However, developments within Growth Areas should be allowed to consider car parking provision on a site by site basis, including the appropriateness of on-street parking control measures and the ability to share parking areas between multiple buildings / uses, in addition to the general approach to providing sufficient car parking to meet the needs of the uses proposed within the Growth Area in question.	Development in Growth Areas should also take account of accessibility, health, safety and wellbeing considerations. The consideration of on-street parking control measures, the ability to share parking and the general approach to providing appropriate levels of parking also applies to Growth Areas.
UC2	National Express West Midlands	National Express West Midlands agrees that it is essential that urban centres are accessible by a range of modes of transport with good connections into their local community and the wider city. Parking in urban centres is often the cause of traffic slowing and considerable congestion. Any on-street parking needs to be consistent e.g. not have different times on different sides of the road.	Support noted.

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		The latter inevitably leads to both sides being used and reducing the through road to effectively one lane for both directions. Any review of parking here also needs to look at where off-street parking is located and access to it. Bus stops need to have priority and better access than car park spaces. We believe Kings Heath, Small Heath, Alum Rock, Stratford Road, Handsworth, Cape Hill and Northfield need to be prioritised.	
UC3	St Modwen Homes Ltd	Generally, agree. This approach has been taken in Longbridge Town Centre where parking is available to the public and measures are in place to manage on-street parking.	Support noted.
SUBURBAN/ PRIMARILY RESIDENTIAL AREAS			
SR1	Bloor Homes	Support the recognition in the SPD that sufficient car parking should be provided for residential properties to maintain residential amenity and to prevent inappropriate on-street parking. Support the principle of Paragraph 5.15 of the Draft DMDPD which provides for garages to count towards parking spaces if they have adequate functional space. The proposed approach will allow for a greater quantum of car parking provision in areas which are less accessible to public transport which is also supported.	Support noted.
SR2	Langley Sutton Coldfield Consortium	The Consortium endorses the identified requirement for a markedly different approach from that taken in the City Centre and edge of City Centre to be taken for the predominantly residential suburbs of the city. The Consortium agrees that parking standards applied to the predominantly residential suburbs need to ensure an	Support noted.

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		appropriate level of parking provision for residents and visitors, whilst maintaining the amenity of nearby residents and occupiers. The Consortium also supports Birmingham City Council's goal of encouraging sustainable travel through the creation of sustainable neighbourhoods characterised by good access to facilities, and convenient options to travel by foot, cycle and public transport.	
SR3	Langley Sutton Coldfield Consortium	<p>The Consortium does not agree on the proposal to <i>"place reasonable restrictions on parking supply to discourage car usage"</i>. Sutton Coldfield currently has very high levels of car ownership and, in general, family dwellings in suburban locations such as Sutton Coldfield often tend to, and will continue to, attract higher levels of car ownership than for dwellings in better connected higher density areas such as town centres and city centres.</p> <p>It is contended that car parking standards for new developments in suburban locations should be allowed to take account of and, where necessary, reflect demographic / social factors and existing levels of car ownership within particular areas rather than seek to control car ownership.</p> <p>It is important for the Birmingham parking standards to incorporate flexibility for the design and layout of new residential development proposals in suburban locations to provide the opportunity to accommodate a sufficient amount of conveniently situated suitable and safe off-street car parking, to avoid car parking being displaced onto streets.</p>	<p>The Council acknowledges the requirements of para 106 of the NPPF and has reviewed the imposition of a maximum standard in Zone C. The SPD has been amended to remove the imposition of a maximum standard for residential in Zone C.</p> <p>The evidence supporting the parking standards will be made available.</p> <p>Consideration of housing type and mix is demonstrated within the SPD through the introduction of differentiation dependant on dwelling size. The zonal mapping also reflects the nature of different locations across the city, with consideration made to ensure that local centres and suburban locations, for example, are approached differently with regards to parking standards. When setting the zonal boundaries, car ownership levels were overlaid into the decision-making process to avoid applying zone A or B parking standards in locations with very high levels of car ownership.</p> <p>The Council guidance seeks to achieve a balance where Electric Vehicle charging for new developments is prioritised, efficient, well designed parking provision. This may mean a mix of on plot and on-street parking where the on-plot spaces could have charging provision. Alternatively, there are increasingly viable on-street charging options for parking which is provided in an unallocated way.</p>

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		<p>There is a need for the delivery of a significant quantum of high-quality family housing to meet the existing and future needs of Birmingham. Imposing stringent car parking restrictions on new homes provided in suburban locations may deter families from moving into the area. This would undermine the focus for the Langley SUE to provide predominantly family housing to meet the identified need.</p> <p>The Consortium contends that the proposal to introduce the stringent maximum parking standards for suburban / predominantly residential areas is contrary to the requirements of the National Planning Policy Framework paragraphs 105 and 106.</p> <p>Whilst the consultation document recognises the importance of considering the accessibility of the location and the availability of and opportunities for public transport, it does not provide a reasoned consideration of: the implications of housing type / mix, including the provision of family homes in suburban locations; local car ownership levels; or the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. It is unclear how the increasing shift towards all new cars being sold in the UK to be electric, and thereby requiring access to electric charging points, can be served by a guidance approach that may restrict the ability for vehicles to be parked in dedicated spaces which have a close and clear relationship to the dwellings that they serve and access to suitable charging points.</p> <p>The evidence for the proposed parking standards that the consultation document refers to is not published or</p>	<p>In other, perhaps higher density, more highly accessibly developments, it may be more appropriate to provide shared, fast charging facilities, or even electric vehicle car club provision in locations where car ownership is less necessary.</p> <p>It is not felt that the guidance precludes the provision of on plot EV charging, but the wording has been reviewed to add greater clarity to how a mix of parking typologies can best achieve a balance in provision. This includes cross-referencing with the draft Birmingham Design Guide which provides design guidance on different parking typologies.</p>

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		analysed as part of or alongside the consultation. There is currently no clear and compelling justification for setting maximum parking standards.	
SR4	St Modwen Homes Ltd	The approach is generally supported. However, there should be reference to the need to take account of site-specific considerations. Therefore, the “unless demonstrated otherwise” should be added to Point 1.	Agreed that site specific considerations should be taken into account and that this should be reflected in the SPD. Additional text has been added to ensure that site specific considerations and/or operational needs of the development, which may support an alternative level of parking provision, will be taken into account.
CONTROLLED ON STREET PARKING			
CP1	Bloor Homes	Support the regularisation of car parking in principle but must be ensured that any parking controls are not so restrictive to cause wider problems. Sufficient car parking provision must be made available with developments in appropriate locations to ensure that properties are adequately serviced by car parking levels.	The Council seeks to apply a balanced approach to parking restrictions and provision of parking spaces. When controlled parking measures are introduced, care is taken to mitigate transference of parking elsewhere. The solution cannot simply be to provide additional parking as this does not address the impact of car travel on the transport network and the environment.
CP2	Langley Consortium	Any proposal to limit on-street car parking should be supported by fully evidenced justification; subject to an appropriate level of consultation and scrutiny; and considered in the context of the area and / or development proposal to which it relates. To avoid a situation arising where there becomes a need to look at imposing unexpected on-street car parking restrictions in new developments in suburban locations, the ability to consider an appropriate level of dedicated off-street car parking or areas for on street car parking to serve the specific locational and housing mix characteristics of each new development needs to be considered through the	Delivery of on-street parking controls are subject to clear project delivery requirements which include justification, consultation, scrutiny and consideration.

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		design and layout of the proposals, as part of the planning application process.	
CP3	Clarke Print	Control parking as long as there is minimal costs involved for my business.	Comment noted.
CP4	National Express West Midlands	We support the introduction of controlled parking where there is a clear need to manage the impact of parking on the operation of the network. Enforcement is absolutely crucial. Many of our bus routes suffer from delays every single day caused by blatant and unpunished illegal parking.	Support noted.
PARK AND RIDE			
PR1	Push Bikes & Bike West Midlands Network	The Parking SPD should provide the details of cycle parking spaces at and the level of occupancy of any cycle parking.	Information on current levels of cycle parking at Birmingham stations will be included in the SPD. Station facilities are managed by TfWM so further detail on station facilities is available at https://www.tfwm.org.uk/operations/park-ride/
PR2	Push Bikes & Bike West Midlands Network	The Parking SPD needs to reflect the potential for 'Cycle and Ride' and the need to have a cycle parking strategy for public transport locations in order to facilitate that. Look at ways to increase the use of cycles to access the location as cycle parking is far more space efficient than car parking.	Station parking (and cycle provision) is managed by TfWM but BCC recognise the importance of cycle park and ride in the Walking and Cycling strategy and will continue to work with TfWM to improve cycle park and ride. The Birmingham Walking and Cycling Strategy Policy 10 states that 'We will facilitate multi-modal travel and linked trips to public transport interchanges'. This includes a commitment to 'Support secure, long-stay cycle parking and bike hire at public transport interchanges.' The SPD has been amended to emphasise our commitment to supporting multi-modal travel through cycle parking and facilities at public transport interchanges.
PR3	Canal and River Trust	Where park and ride is proposed in close proximity to the canal network, and/or associated with the canal network,	Agree that safe, secure cycle parking areas are needed at Park and

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		it should include the provision of safe, secure cycle parking areas, to allow for onward connections.	Ride sites and additional wording has been added to emphasize this.
PR4	Langley Consortium	There is no planning policy requirement for a Park and Ride site to be located within the Langley SUE site and the emerging outline planning application proposals for this development therefore do not include such a facility. However the Consortium would be supportive of the provision of a Park and Ride facility within the vicinity of the SUE if this would assist with improving the connectivity of the SUE with Birmingham City Centre by public transport and thereby encourage residents to leave their car(s) parked at home.	Comment noted.
PR5	National Express West Midlands	More Park and Ride is needed in and around Birmingham. Active consideration should be given to bus/Sprint-based Park and Ride at key motorway junctions e.g. M6 J7 and M5 J3. Free parking at train stations encourages people to switch away from bus and is difficult to justify when station car parks are full by 0730 every morning.	Comments noted and relayed to TfWM for consideration.
SCHOOL PARKING			
SP1	Push Bikes & Bike West Midlands Network	Strongly support the expansion of Car Free School Streets Exclusion Zones. As noted in the Parking SPD, encouraging children to use active travel can build habits that make them more likely to use active travel in the future. Creating safe streets around schools is part of that.	Support noted
SP2	Bloor Homes	The school parking policy makes reference to the use of measures such as traffic regulation orders and parking enforcement controls on roads and around schools. These are not matters that can be controlled by a developer.	The document sets out both parking requirements for development and the city's wider parking strategy for the city. It is not intended solely as planning guidance, but as a wider parking document hence

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		This falls outside the planning system and does not need to be enshrined in SPD.	the inclusion of matters outside the planning system.
SP3	Langley Consortium	Car parking provision for staff and parents of ew and expanded schools should be considered on an individual case-by case basis, with opportunities explored for shared / dual use car parking with other facilities and the incorporation of drop-off / pick-up areas, where possible and where appropriate. There should also be an ability for applicants to put forward their own proposals for parking enforcement controls or measures to discourage inappropriate parking near new or expanded schools. Whilst it is acknowledged that the 'Car Free School Streets' and 'School (Traffic) Exclusion Zones' referred to within the consultation document are one way in which parking could be managed, this should not be the only option. There should be an allowance for a range of options to be considered to achieve an appropriate strategy for each school.	New school developments should aim to make areas around schools as low traffic as possible. The Council is opposed to the provision of drop-off/pick-up areas in the vast majority of instances as these encourage car use and can often become a safety hazard or create queuing and air quality problems. The Council will consider alternative proposals for parking enforcement controls/measures. The document does not prohibit different options from being considered.
DISABLED PARKING			
DP1	Canal and River Trust	The illustration on page 30 appears to block the disabled parker's access to the pavement with an EV charging point. Further advice on good design would be beneficial, and a clear indication of whether illustrations are of good or bad examples.	Advice on good parking design is included in the draft Birmingham Design Guide. The SPD has been amended to include a different photo.
DP2	Argent LLP	Acknowledge importance of providing disabled parking to ensure places are accessible and inclusive. Note that the SPD seeks to ensure that any changes to existing disabled parking spaces are the subject of consultation with	Agreed. The SPD has been amended to include consultation with other relevant stakeholders.

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		<p>“appropriate disability action groups and the access forum”. Argent would recommend that there should be an element of flexibility on who should be consulted in each case. Suggest this is reworded as follows: “The Council will ensure that any proposed changes to parking for disabled people face constructive consultation with the access forum, disability action groups, and/or any other appropriate stakeholders.”</p>	
PARKING STANDARDS ZONE CHARACTERISTICS AND LOCATIONS			
Z1	Langley Consortium	<p>Agree that more generous car parking standards should apply to new developments in suburban / predominantly residential locations in Zone C. It is not considered appropriate to apply maximum car parking requirements across the whole of this Zone.</p>	<p>The Council acknowledges the requirements of para 106 of the NPPF and has reviewed the imposition of a maximum standard in Zone C. The SPD has been amended to remove the imposition of a maximum standard for residential and non-residential development in Zone C.</p>
Z2	Planning Prospects Ltd (on behalf of St Modwen Homes Ltd)	<p>The Zone B area defined for Longbridge Growth Area should be expanded to include the entire Longbridge Town Centre development (including land yet to be developed). It should include all land bounded by Cooper Way to the south, the railway line to the east, Longbridge Lane to the north and A38/B4120 to the west. All land within Longbridge Town Centre meets the characteristics defined for Zone B. It is a highly accessible location with good access to public transport including Longbridge Train Station as well as bus connections to Birmingham City Centre and the wider area. It is also well served by cycle and walking facilities.</p>	<p>The Longbridge boundary has been reviewed and remains unchanged as at present the areas mentioned do not meet the accessibility standards or on-street parking control requirements to enable a change in zone. However the standards will always be applied as guidance, and local flexibility will be considered, particularly where future development proposals include or can demonstrate improvements in accessibility and parking management to facilitate lower parking provision.</p>

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PARKING STANDARDS				
PS1	Push Bikes & Bike West Midlands Network	Cycle parking	There are no standards provided for provision of electric cycle parking. This is a growth market which needs to be catered for. The Parking SPD needs to include standards for electric cycle parking.	As this is an emerging market there is a current lack of evidence to identify demand and best practice. The Council will monitor the need for electric cycle parking provision and support provision where appropriate.
PS2	Push Bikes & Bike West Midlands Network	Cycle parking	The design criteria for short and long stay cycle parking are well stated, but phrases like 'as possible' and 'potentially' should be removed. The cycle parking should be prominent and close to access points. The criteria should also include: The number of gates and doors that need to be passed through to access the cycle parking should be kept to an absolute minimum required to maintain security, and they should all be easy to operate while pushing a laden cycle.	The suggestion regarding gates and doors will be included in the Birmingham Design Guide where parking design guidance sits.
PS3	Push Bikes & Bike West Midlands Network	Cycle parking	It is appropriate for Birmingham City Council to offer developers the option to finance off-site unallocated cycle parking. However, there is a risk that insecure off-site cycle parking may be seen as a cheaper option than on-site secure cycle parking. Clarification should be included to dissuade developers from taking this route.	Agree that clarification is inserted for preference for on-site cycle parking. However, off-site provision may be considered where appropriate.
PS4	Push Bikes &	Cycle hire	Cycle hire requirements should apply to all major trip generators, not only leisure	Agree. The draft SPD promotes the provision for cycle hire in leisure developments and hotels. This can be expanded to include

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	Bike West Midlands Network		facilities.	all major non-domestic development.
PS5	Push Bikes & Bike West Midlands Network	Cycle hire	Suggest including the option for hotels to choose to provide cycle hire for their guests instead of spaces for the cycle hire scheme. This would facilitate longer term cycle hire by hotel guests, who are likely to be the main users of any cycle hire docks located at hotels.	Agree. The SPD has been amended to include the option to provide own cycle hire as an alternative to the TfWM Cycle Hire Scheme.
PS6	Bike West Midlands Network	Cycle parking	Where the parking standards specify a minimum of 2 spaces, as for A1 shops, that means 1 Sheffield stand. It would be better to have a minimum of 4 spaces (2 Sheffield stands) so that if one of the Sheffield stands is damaged, there is still cycle parking available. The space required and the expense is not much greater than providing a single stand, but it makes a significant difference in the long term for people using cycles.	Agree. The SPD has been amended to from 'minimum 2 spaces' to 'minimum 2 Sheffield stands* or suitable equivalent'. *Where proven that space prohibits this, 1 Sheffield stand is sufficient for small developments.
PS7	Bike West Midlands Network	Cycle parking	Educational establishments should not have a reduced level of provision compared to other businesses. There should be a higher level of cycle parking provision for students who should be encouraged to cycle to school.	Cycle parking levels for education uses have been reviewed and have been amended so it is consistent with other uses and provide for higher levels of cycle parking provision.

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PS8	Bike West Midlands Network	Cycle Parking	Overall, the parking standards should have a minimum of at least 1 cycle stand for every 10 people. Birmingham City Council has the stated aim of achieving a 10% modal share for cycle traffic.	In general, the cycle parking standards require at least 1 cycle stand for every 10 people. Cycle parking levels for education uses have been reviewed and have been amended so it is consistent with other uses and provide for higher levels of cycle parking provision
PS9	IM Properties (Peddimore)	Cycle parking	The cycle parking standards no longer relate to floorspace which could be difficult to establish for speculative developments. Consequently, it is suggested that the minimum in the Draft SPD should be based on the lower of the standards from the 2012 SPD and Draft SPD.	Further information has been added to the SPD to clarify the approach to parking standards for speculative developments. This includes thresholds for floorspace equivalents where staff/visitor figures are not available.
PS10	Canal and River Trust	General	The approach to applying the proposed parking standards is not clear.	The SPD has been amended to provide greater clarity regarding the application of parking standards.
PS11	IM Properties (Peddimore)	General	Under the B2 guidance, there is reference to requirements for vehicle maintenance/repair/tyre and exhaust fitting. It is assumed this relates to these specific uses under the B2 and not the operational requirements of general B2 units.	Yes, this reference specifically relates to vehicle repair/maintenance type uses. Clarification/separation has been made in the amended SPD.
PS12	Bloor Homes	Car parking Residential	Concerned that in certain circumstances the standards refer to fractions of a car parking space in seeking to combine allocated and unallocated parking. This would create unnecessary disparity of car parking provision and dedication issues between individual properties.	The residential parking standards have been reviewed and simplified. Where overall levels of provision for a development are not a whole number, it will be rounded up. Examples have been included in the SPD for ease of understanding how the standards will be applied.

Rep ID	Name	Land use/mode	Main Issues raised	Council response and how issues have been addressed
			The standards also need to distinguish between apartments and houses and should be rounded up to the nearest whole dwelling space.	
PS13	Bloor Homes	Car parking Residential	<p>The 'unallocated' car parking requirement should be separate and in addition to the maximum car parking standards. There is a highly limited allowance for visitor parking in larger properties. Unless specific unallocated car parking provision is made for visitors on new residential developments this will result in on-road car parking. Appropriate provision should be made for visitor parking and new residential schemes.</p> <p>As presented, the matrix combination of allocated and un-allocated parking within different zones and the introduction of fractions of car parking space is overly complicated, impractical and unnecessary. The standards should be simplified to specify allocated parking requirements per property (i.e. dedicated) and specify the required amount of unallocated spaces within development schemes as a %. It should also acknowledge that apartments and houses may present different parking requirements depending on factors such as location.</p>	The residential parking standards have been reviewed and simplified.

Rep ID	Name	Land use/mode	Main Issues raised	Council response and how issues have been addressed
PS14	IM Properties (Peddimore)	Car parking Employment	The Parking Standard Rules should allow the maximum car parking standards for employment uses to be exceeded at the discretion of Planning and Transportation officers subject to a suitable evidence base and a robust Travel Plan with an appropriate car driver modal share target.	It is also acknowledged there is a need to reflect local circumstances, context and requirements of individual developments when assessing applications. The standards provide a guide on the appropriate levels of parking, but the City Council will take account of whether there are any circumstances, related either to the site, or the operation of the development, which may support an alternative level of parking provision. The SPD has been amended to reflect this.
PS15	Bloor Homes	Car Clubs	Unclear how the 'car club' car parking spaces would be used in practice. It is suggested that residential developments of over 100 units should provide car club spaces. It is unclear how this would be controlled. Whilst we have no objection to car club car parking spaces, these should be rolled into general visitor provision.	This query misunderstands the nature of formalised car club provision which is not the same as personal car sharing between 2 people living in the same development. Car Clubs are a nationally recognised tool for reducing car ownership and usage. As detailed in the SPD, provision of this facility must align with nationally recognised accreditation therefore the accredited provider would manage and control the provision of any car club spaces. Developers would therefore not be expected to control/manage use of car club spaces themselves; the provider would do this.
PS16	Bloor Homes	EVCP	The proposed requirement for 'one Active EVCP charging per dwelling with associated parking space' needs further clarification. It should not be mandatory that the EVCP Unit itself is installed. This is a matter for individual choice according to need. It is more appropriate to ensure that the infrastructure is in place to enable an occupier to install an EVCP charging unit which meets their requirements in future.	The DfT consultation provided detailed evidence to support proposed EVCP requirements. BCC supports these proposals. EVCP provision is an important element of achieving decarbonisation of transport and our Route to Zero targets.

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PS17	Bloor Homes	EVCP	It is excessive for 20% electric vehicle charging provision in the areas of off street car parking where there are five spaces or more. It is agreed it is necessary to futureproof offsite parking provision, however this level of provision cannot be supported. Instead infrastructure should be made available for additional charging points to be installed in future, but on-street EVCP parking spaces should not be sought at the present time.	As above – ref PS16.
PS18	Bloor Homes	EVCP	The SPD refers to the July 2019 Department for Transport consultation on electric vehicle charge points. The SPD seek to assure that developments align, or exceed, these requirements. This is inappropriate, the Department for Transport document is simply a consultation document. It is not adopted policy and can be afforded no weight in the decision-making process. The standards within it could change and there is no justification for seeking any level of provision over and above that contained in the consultation document.	Whilst not adopted policy, BCC is supportive of the proposals within the DfT consultation and the evidence supplied by the government to support these. EVCP provision is an important element of achieved decarbonisation of transport and our Route to Zero targets. The proposed standards in the SPD do not exceed the requirements in the government consultation, but in the absence of detailed adopted national guidance or legislation, it is felt appropriate to future proof our local standards so that when legislation is adopted we are likely to be aligned with this. The SPD has been amended to clarify that development will not be expected to exceed forthcoming Government standards, but the Council will be supportive of development which do exceed the standards of their own accord.
PS19	St Modwen Homes Ltd	EVCP	No evidence base has been provided to justify EV charging requirements. Any requirements for EV charging should be addressed in accordance with other	The DfT consultation provided detailed evidence to support proposed EVCP requirements. BCC supports these proposals. EVCP provision is an important element of achieving decarbonisation of transport and our Route to Zero targets.

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			legislation (i.e. Building Regulations) if it is necessary and can be justified.	
PS20	Langley Consortium	EVCP	Department for Transport Consultation on Electric Vehicle Charging in Residential and Non-Residential Dwellings identified preference for charging points to be introduced via an update to the Building Regulations. Whilst there should be an opportunity for developers to exceed any standard introduced through Building Regulations where appropriate to do so, it is not considered appropriate for an unjustified requirement for any residential or non-residential use to exceed the national standard to be brought in through the SPD. The SPD should recognise that the requirements to provide electric vehicle charging points need to take into account the ability for the electricity network to support the number and type of charging facilities installed. Not restricting the allocated (off-street) residential parking to the proposed maximum provision may improve the ability for residents to charge their private electric vehicles at a convenient location (at home),	See response to PS18.
PS21	Aston Universty		Will these requirements need to be put in for any new buildings or only those including parking into new builds? I.e. if we are looking	Yes, the expected minimums for non-car-based parking provision are separate to car parking levels and standards will need to be generally followed for all new developments.

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			to build a new building will we automatically have to have that many bicycle parking stands, car charging even if parking wasn't going to be included?	
PS22	Sport England	Cycle parking	Sport England supports the intention for prescribed cycle parking standards for all the identified planning uses set out in the land uses table and is pleased to see this is appropriately inclusive of all users including residents, staff, customers, visitors, guests and so on.	Support noted.
PS23	Sport England	Cycle facilities	Sport England supports the provision of standards for showers and changing facilities in proposed employment (B Class) uses. Wish to see the provision of showers, changing and lockers being included as a requirement for any proposed developments that generate significant employment numbers, not just those within the B Class Uses.	Additional guidance has been included in the SPD in relation to the thresholds and types of development which will be expected to include shower/ changing facilities
PS24	Sport England	Cycle parking	In balancing the provision of car parking, with other forms of provision including cycle parking, developers should be required to demonstrate how this will achieve a carbon neutral approach to provision, to be assessed via their transport impact assessment. Emphasis should be on cycling provision being safe and secure as much as achieving the prescribed standards of cycle parking	Agree, that Transport Assessments should include how development encourages modal shift and contribute to carbon neutral objective. The Design Guide provides detailed design guidance on cycle parking. The SPD does make provision for commuted sums to be secured where developers are unable to satisfy the requirements.

Rep ID	Name	Land use/mode	Main Issues raised	Council response and how issues have been addressed
			<p>spaces.</p> <p>Where on site secure cycle parking provision is not possible/practicable, the SPD should make it clear that contributions towards provision of conveniently located off-site secure cycle parking, and/or cycle hire facilities will be expected. The SPD should set out the Council's expectations for off-site contributions including a method for calculating such contributions.</p>	
PS25	Adlington Retirement Living	C2 housing	<p>The parking standards contained in the SPD for new residential development do not differentiate between different forms of specialist elderly accommodation which are becoming more prominent. Parking standards for C2 Extra Care (very different from a care home but still within the same use class) and C3 Sheltered Accommodation need to be provided and clearly set out. The Parking standard for C2 extra care should be 50% parking provision i.e. for 60 apartments, this would mean 30 parking spaces. This is sufficient for staff, visitors and residents and is the standard level of parking provided on schemes of this nature.</p>	<p>Further detail has been provided regarding specialist elderly accommodation.</p>
PS26	National Express West Midlands		<p>Zones and max/min levels should also take account of delays parking may cause to bus</p>	<p>The zone mapping uses the TRACS system which is based on real public transport timetabling. As peak period timetabling takes congestion levels into account this is deemed to be the most</p>

Rep ID	Name	Land use/mode	Main Issues raised	Council response and how issues have been addressed
			routes	appropriate way of assessing overall levels of accessibility. It is not currently possible to factor real time accessibility into this system. However impacts of new developments on the transport network, including bus routes, is always a key consideration in the development control process.
PS27	St Joseph Homes Ltd		The residential parking standards in Zone A would have serious viability implications for development in Birmingham. Market research suggests that 2 or 3 bedroom homes without car parking spaces will be significantly less desirable than those that have them, which has implications on the viability and deliverability of such schemes. A 10% provision of parking spaces is not supported because the public transport infrastructure in Birmingham is not currently sufficient to support such proposals. The proposals in the emerging Birmingham Transport Plan will greatly improve the public transport options in Birmingham; however, the full breadth of the Transport Plan proposals is not to be fully implemented for a decade. We therefore suggest that the proposed residential parking standards are re-considered, and the evidence base and viability implications are considered further.	<p>The Zones and parking standards within the SPD have been set based on current levels of public transport accessibility therefore they are already considered to be appropriate and justified.</p> <p>However the SPD has been amended to acknowledge that in exceptional circumstances, there may be occasions when it could be appropriate to have a lower or higher level of parking depending on the specific details of the application.</p>
PS28	St Modwens Homes Ltd	Minimum standards	Further clarification of minimum levels should be provided.	Further clarification regarding minimum has been provided in the SPD.

Rep ID	Name	Land use/mode	Main Issues raised	Council response and how issues have been addressed
PS29	St Modwens Homes Ltd	Garages	The SPD states that garages will contribute towards parking provision where they have adequate functional space. This approach is supported.	Support noted.
PS30	St Modwens	General	Site-specific considerations should be taken into account when applying the standards in Appendix A to new development proposals.	Agree. Additional text has been added to ensure that site specific considerations and/or operational needs of the development, which may support an alternative level of parking provision, will be taken into account.
PS31	Lidl	General	The SPD does not specify whether thresholds are to be measured with reference to gross or net floorspace figures.	Agree. The SPD has been amended to clarify that all thresholds and standards which reference floorspace are to be calculated as gross floorspace.
PS32	Lidl	Retail	Concerned that proposed standards are overly restrictive. The standards as proposed could significantly constrain our Client's ability to provide that appropriate amount of parking when it brings forward new stores. A material difference exists between the amount of parking that Lidl would typically expect to provide, which is appropriate to its operation, and the amount that the new standards would permit. The difference is particularly pronounced in those locations inside Zone B (Urban Centres)	It is acknowledged that appropriate parking provision is required for this land use. The standards have been reviewed to ensure they are not overly restrictive. The standards in the SPD have been amended for Class E Shops over 1000m ² in zones B and C.
PS33	Lidl	Retail	The draft standards stipulate that new convenience retail development of 1,000 sqm or more will need to provide dedicated motorcycle parking (a minimum of 1 space	Dedicated provision for powered two wheelers is stipulated within the standards to ensure that parking is appropriately designed and secure. However, the guidance has been amended to allow consideration for the associated needs of the type of

Rep ID	Name	Land use/mode	Main Issues raised	Council response and how issues have been addressed
			and overall provision of 1 space per 400 sqm of floorspace). Lidl does not provide dedicate motorcycle spaces. This is because of: a) the limited likelihood of shoppers visiting the site by motorbike and b) where shoppers do visit by motorbike, Lidl is content that these are parked in car parking spaces.	development proposed.
PS34	Lidl	General	Request flexibility us built into the SPD, so that it is open to applicants to justify an amount of parking not in accordance with the standards, where there are legitimate reasons for doing so.	Additional text has been added to ensure that site specific considerations and/or operational needs of the development, which may support an alternative level of parking provision, will be taken into account.
PS35	Moda	General	Welcome the vision and principles behind the city council's revised Parking Standards and supports its aim to further support sustainable transport and deter reliance on the private car. However, would like to see further clarity on how cases will be dealt with during the 'transition period' following adoption of the policy whilst necessary public transport infrastructure is still lacking, whilst allowing greater flexibility when considering proposals for replacement and new off-street parking.	<p>Support noted.</p> <p>Guidance and standards have been aligned to existing public transport accessibility levels which supports the proposed parking levels. The accessibility data only takes into account transport infrastructure delivery projects which are timetabled for delivery within 3 years. Therefore, unless very short-term parking requirements can be demonstrated, prior to this 3-year timescale, the standards in this SPD should already be appropriate to existing public transport service.</p> <p>Without strong enforcement capabilities, there is a risk that short term parking provision may become permanent and affect trip generation, reduce public transport uptake, and be detrimental to network management.</p> <p>The SPD has, however been amended to account for delayed public transport infrastructure schemes, only in relation to those</p>

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				<p>which have been identified for delivery within the next 3 years.</p> <p>Additional text has been added to clarify that the standards will not apply to detailed and reserved matters applications that are already registered prior to the date of adoption of the SPD. The SPD will have flexibility to allow the Council to consider the requirements of 'special' cases for example major schemes which are phased over long periods of time.</p>
OTHER				
AI1	St Modwens Homes Ltd		<p>An evidence base to justify the EV charging point requirements should be provided to enable consultees to consider and comment fully.</p> <p>Clarification on minimum standards parking standards for residential development in Zone C.</p>	<p>The evidence base supporting the parking standards has now been made available for public comment.</p> <p>Minimum parking standards are clarified in the amended SPD.</p>

Appendix B

Draft Parking SPD – Summary of citizens’ comments and Council response

Rep ID	Main issues raised	Council response and how issues have been addressed
CITY CENTRE PARKING		
CC1	Concern regarding impact of proposals on the economy – shops/businesses/leisure. This will put people and businesses off coming to Birmingham.	<p>There are substantial economic costs to Birmingham as a result of congestion, poor air quality and environmental damage/ carbon emissions which are associated with increasing private car usage. This is not sustainable for the city and therefore a balanced approach must be taken to ensure travel into and within the city can be made by more sustainable means whilst supporting the economy. Congestion currently costs Birmingham’s economy £632 million a year. This figure is expected to rise as demand increases. There is also substantial evidence to show how sustainable transport can support and attract business to the city; a healthier workforce and residents. Less congested, more car-free environments can help to create healthy high streets.</p> <p>Birmingham Connected and the draft Birmingham Transport Plan provide a clear steer for the Parking SPD in their aim to create an efficient, attractive, sustainable healthy and equitable transport system by seeking a reduction in reliance on the car and supporting walking, cycling and public transport. The BTP seeks to ensure that public transport will be the preferred choice for most people travelling into and out of the city centre. There is clear evidence that the centre is already highly accessible by public transport. This is set to further improve with investment in and extensions to bus, bus rapid transit, train and tram networks including prioritisation over private car travel to reduce the negative impact that congestion and travel disruption has on productivity.</p> <p>There is also evidence that large businesses who are choosing to locate in the city centre are placing greater emphasis on public transport use and active travel opportunities for staff - The new HSBC headquarters in Birmingham, for example, does not provide any parking for their 2500 staff except for disabled spaces. The company have invested heavily in providing facilities to support cycling to work for their employees, including shower facilities and bike parking. They recognise</p>

Rep ID	Main issues raised	Council response and how issues have been addressed
		<p>that supporting employees to travel actively can bring significant health benefits to their workforce. (Source)</p> <p>A city centre parking survey undertaken in 2016 showed that there is significant over-supply of parking in the city centre which represents an inefficient and uneconomic use of land.</p> <p>Provision for essential fleet vehicles will not be limited by the proposed parking standards.</p>
CC2	There should be more parking for disabled drivers/ Blue Badge Holders and those with mobility issues. Concern regarding any removal of blue badge parking bays.	Extensive redevelopment of the city centre and its urban realm/ highways mean that there are occasions when Blue Badge parking bays must be removed. BCC has committed to relocating any Blue Badge parking bays as close as possible to their original location on such occasions. Further assessment will be undertaken to establish if more blue badge spaces can be provided and how/where best to locate these.
CC3	There should be more parking provision for powered two wheelers (motorcycles). Provision should be better quality, more secure and close to/visible from key destinations.	The SPD has been revised to include additional guidance on powered two-wheeler parking provision. It should be noted that in the city centre in particular, there is substantial competing demand for kerb side space and it is not always possible to dedicate space specifically for motorcycle parking close to all key destinations.
CC4	Public transport is not good enough/ reliable enough/ safe enough to offer a viable alternative to car travel. Public transport should be improved first before reducing car travel.	There is record investment in the public transport network across the West Midlands and in Birmingham. This is set to further improve with investment in and extensions to bus, bus rapid transit, train and tram networks as set out in Birmingham Connected and the Birmingham Transport Plan. The zonal mapping for parking standards takes public transport accessibility into account with regards to the approach to parking provision. Therefore, where accessibility is lower, parking provision will be higher.
CC5	Public transport is not a viable alternative for those with mobility issues or disabilities.	It is acknowledged that public transport may not always be an option for those with mobility issues or disabilities. Therefore, the approach to parking supports the maintaining Blue Badge parking provision across the city centre. It is also felt that encouraging more sustainable travel amongst the whole population will ensure that for those who do need to use a car, roads are less congested, and parking is more readily available.

Rep ID	Main issues raised	Council response and how issues have been addressed
CC6	Pavement parking should be addressed/ banned.	The government have proposed national legislation which would support local authorities in tackling pavement parking. The Council has submitted a response to government consultation on these proposals which outlines our support for greater controls to ban pavement parking and enforce this. Further text regarding BCC policy on pavement parking has been added.
CC7	Concern regarding impact on places of worship.	The controlled parking programme which is in place across the city centre includes different traffic regulations (and parking charges/timings) for different areas. Each parking 'zone' is designed according to the appropriate requirements for managing parking in that area, and accommodating the needs of residents, businesses and organisations where possible. It is accepted that wording regarding removal of all no fee on street parking is misleading. This will be revised to 'removal of all uncontrolled on-street parking'. In other words, whilst there will be parking restrictions put in place throughout the city centre, this does not necessarily mean that all locations will incur parking charges at all times of the day and all days of the week. Prior to the introduction of any new parking restrictions or changes, we will consult with premises in the local area and work with organisations/ businesses affected to ensure that operational needs can still be met wherever possible.
CC8	Concern regarding impact on leisure industry, particularly the night-time economy as there is a lack of alternative provision to private car at off peak times and security concerns about parking further from work.	<p>The controlled parking programme which is in place across the city centre includes different traffic regulations (and parking charges/timings) for different areas. Each parking 'zone' is designed according to the appropriate requirements for managing parking in that area, and accommodating the needs of residents, businesses and organisations where possible. It is accepted that wording regarding removal of all no fee on street parking is misleading. This will be revised to 'removal of all uncontrolled on-street parking'. In other words, whilst there will be parking restrictions put in place throughout the city centre, this does not necessarily mean that all locations will incur parking charges at all times of the day and all days of the week. Prior to the introduction of any new parking restrictions or changes, we will consult with premises in the local area and work with organisations/ businesses affected to ensure that operational needs can still be met wherever possible.</p> <p>Regarding provision for the night-time economy this is generally accommodated by the freeing up of spaces which are only utilised at peak times, however it is acknowledged that this issue needs</p>

Rep ID	Main issues raised	Council response and how issues have been addressed
		<p>careful consideration on a case by case basis. Text has been included in the SPD to acknowledge that in exceptional circumstances, there may be occasions when it could be appropriate to have a lower or higher level of parking depending on the specific details of the application. Localised off-peak accessibility issues and site-specific security concerns could be considered in this instance.</p>
CC9	<p>Kerbside waiting and idling vehicles should be addressed/ banned. Particular concerns raised regarding taxis idling near stations (e.g. Stephenson Street).</p>	<p>The council is keen to address the issue of idling and the impact this has on air quality and therefore public health. However it should be noted that it is very difficult and resource intensive to legally enforce anti-idling measures.</p> <p>Local authorities have the power to issue £20 fixed penalties for emission offences and stationary idling. However, this can only be imposed after a period of time if a motorist refuses to switch off their engine off when asked to do so by an enforcement officer. The majority of drivers will therefore drive off without receiving a penalty.</p> <p>The council's <u>Switch Off School Streets</u> campaign provides a toolkit to support schools in raising awareness and reducing idling in the vicinity of schools. Reference and a link to the toolkit has been added to the School section of the SPD. Work has also begun assess the practicality of installing air quality sensors in all (initially) primary schools. This will support measures to raise awareness of air quality issues such as idling and to gather data for targeting action where it is most needed.</p> <p>The council acknowledges the need to increase signage and advertising to tackle the issue of idling. It is proposed this will be addressed through the forthcoming Clean Air Strategy.</p>
CC10	<p>Car owners in the city centre are being treated unfairly.</p>	<p>The option to own and use a car in the city centre is not being removed. Evidence shows that there is an excess of parking provision in the city centre and many developments in the past were built with extensive parking provision. It is important that congestion and air quality issues in the city centre are tackled, and that land use is efficient and sustainable. The SPD aims to take a balanced approach that sustains the highest possible levels of access to the city centre and reflects the fact that tens of thousands of people travel into and around the city centre every day without a private</p>

Rep ID	Main issues raised	Council response and how issues have been addressed
		car.
CC11	Motorists should not be targeted. Driving/owning a car is a fundamental freedom.	It is not possible or desirable to sustain current levels of growth in private car usage whilst also providing for a growing population. The impacts of private car usage on the environment, air quality, public health and congestion are very significant and it is essential that the city works to provide and promote alternative, more sustainable travel options.
CC12	Comments both for and against a potential Workplace Parking Levy. Some feel it is another tax on motorists, others feel it is necessary for reducing car use and generating investment in public transport/walking and cycling.	<p>WPL investigations have been temporarily suspended in light of Covid19. Extensive impact analysis and evidence will need to be gathered to support any future decisions regarding introduction of a WPL.</p> <p>No scheme would be implemented before 2023. It is anticipated that a large proportion of vehicles would be CAZ compliant by this time. A comprehensive workplace parking study supported by a detailed parking survey would be undertaken to inform any potential levy. Engagement with employers would also be undertaken and the Council will work closely with the Chamber of Commerce and other businesses to understand the impact of the WPL.</p> <p>The Transport Act (2000) provides the enabling legislation for WPL and provides flexibility to allow exemptions and discounts to certain user groups. Exemptions relate to spaces which do not have to be licensed at all such as spaces used by a particular vehicle type e.g. motorbikes, delivery or fleet vehicles. Discounts relate to spaces which need to be licensed but are not chargeable. 100% discounts will be considered for workplace parking spaces provided for registered Blue Badge holders and small businesses who provide a low number of workplace spaces (e.g. 10 or fewer chargeable spaces).</p> <p>Formal consultation will be undertaken which will enable better understanding of any potential scheme including chargeable spaces, exemptions, discounts and levy potential. The findings of all consultations and further technical assessments will be made public will be brought to the Council's Cabinet for consideration.</p>
CC13	Better parking enforcement is required.	The City Council has a large team of civil enforcement officers, employed through NSL, who work hard to enforce parking restrictions across the city. This is a huge task given the size of Birmingham and the density of streets on which there are parking restrictions.

Rep ID	Main issues raised	Council response and how issues have been addressed
		<p>The Council issues an Annual Parking Report which details enforcement activity and how the authority is meeting it's enforcement obligations. A team of Civil Enforcement Officers (CEOs) employed through NSL ensure that the parking restrictions throughout Birmingham are enforced as well as delivering additional benefits under the Birmingham Business Charter for Social Responsibility.</p>
CC14	<p>There should be less parking in the city centre. Parking charges are not enough of a deterrent to change travel behaviours. All on street parking in the city centre should be banned.</p>	<p>The Council aims to take a balanced approach to parking which ensures that, whilst promoting travel behaviour change through demand management measures, businesses and individuals are not unfairly impacted by overly stringent measures.</p>
CC15	<p>Short stay/stopping/unloading/needs to be catered for.</p>	<p>Provision for unloading and short stay is an important part of kerbside usage and availability and management of this will continue to be a priority. Additional text has been added to emphasise the importance of loading/ stopping and short stay provision for new developments.</p>
CC16	<p>Paradise/Brindley Street Multi Storey Car Park should not be closed – insufficient alternatives to car travel for the night-time economy.</p>	<p>A 2016 study on parking in the city centre demonstrated that there is a significant over provision of parking, equivalent to almost 10,000 spaces. The current number Private of Non-Residential long stay spaces per worker in the city centre is significantly higher than other comparable cities (Manchester and Nottingham).</p> <p>It is essential that private car usage is reduced in Birmingham to support achieving Climate Change and Air Quality targets and to manage the economic and environmental damage caused by congestion on the road network. There is therefore sound policy justification for the closure of Brindley (Paradise Circus) Multi-storey, Cambridge Street. However, it is acknowledged that there are additional considerations which must be taken into account regarding any closure proposal in this specific location, including provision for the night-time economy, shift/off-peak workers and replacement of Blue Badge parking bays.</p> <p>It should be noted that the Paradise development will bring additional car parking capacity to the immediate vicinity, with provision of 510 parking spaces including 31 Blue Badge parking spaces. There remain a significant number of other alternative parking options within the city centre. The Metro, with a stop outside Birmingham library, now provides tram services every 15</p>

Rep ID	Main issues raised	Council response and how issues have been addressed
		<p>minutes until beyond midnight.</p> <p>Views and comments will be fed into any future decision making regarding this site or other parking issues in the Westside area of the city.</p>
CC17	Parking in the city centre (particularly on street) should be substantially reduced/banned. Parking charges are not enough of a deterrent to change travel behaviours.	The City Council is making significant changes to both the public realm and the transport network in the city centre, and is seeking to reduce overall levels of parking. However, a balanced and gradual approach is important to ensure that parking is still available for those who do not have viable alternatives, and to support the city's economy.
EDGE OF CITY CENTRE PARKING		
EC1	Proposed measures will put more pressure on edge of city where already congested.	For all scheme proposals, careful analysis of impacts and detailed consultation with residents will be undertaken. Schemes will always be designed to limit 'knock on' impacts elsewhere, although depending on the proposals, it is never possible to fully mitigate this. The parking management proposals for 'edge of city' areas as set out within the SPD are designed to help ensure that additional pressure is not generated or can be managed through parking enforcement.
EC3	Allocate 1 parking permit per house and charge more for additional cars.	It is agreed that permit allocation should be limited in locations where they are highly in demand. A review of permit allocation processes will be undertaken separately to the Parking SPD.
EC4	Build more cheap car parks on outskirts of city centre.	Availability of land on the edge of the city centre is very limited. Additional car parking provision would not be an efficient use of valuable land and would be contrary to the core policies within Birmingham Connected and Birmingham Transport Plan. The approach set out in the SPD aims to manage parking demand in edge of city areas, through parking controls, to minimise congestion and protect amenity for local residents.
EC5	Remove the option of car use entirely to end car culture.	The Council is keen to discourage private car use wherever viable, however a balanced approach must be taken which does not unfairly impact both citizens and businesses.
EC6	Clean air zone approach should be applied by schools and busy junctions.	The scope of the Parking SPD does not directly cover air quality management. Comments have been passed on to the CAZ Team for consideration.

Rep ID	Main issues raised	Council response and how issues have been addressed
EC7	Need 'real' park and ride, not train station ones. Consider last part of journey from bus stop to destination.	Whilst some think of 'traditional park and stride' schemes as being large out of city car parks with shuttle bus facilities, the TfWM stations provide an extensive network of park and ride opportunities which are equivalent to many other bus-based park and ride schemes in other cities. Birmingham is fortunate to have such a high density of over-land rail routes that many other cities do not have. Whilst opportunities for suburban bus or bus rapid transit park and ride provision are being considered both within and just outside the authority boundary, it is important not to overlook existing rail park and ride provision which equates to nearly 2400 parking spaces. Clarity is provided within the SPD regarding different types of park and ride provision and the validity of rail park and ride.
EC8	Not enough detail provided on this policy.	Further detail has been added with regards to roll out of edge of city parking controls.
EC9	Support high density housing with zero parking to meet housing need.	Support noted.
EC10	Developments close to rail stations should be zero parking and high density.	The Council aims to take a balanced approach to parking which ensures that, whilst promoting travel behaviour change through demand management measures, businesses and individuals are not unfairly impacted by overly stringent measures. Developments close to rail stations will be in zone B where there will be restricted maximum parking levels. Higher density development is encouraged in areas well served by public transport responding to the site context and local housing need.
EC11	Detached housing with parking near stations should be rejected.	Proposals for new housing will need to comply with policies in the Birmingham Development Plan. Policies are set out in relation to the type, size and density of new housing. To meet the city's wide-ranging housing needs, it would not be appropriate to exclude certain types of housing, although the Council does support higher density development in areas with good public transport accessibility.
EC12	Shops need parking as heavy shopping can't be taken on public transport.	The parking standards have been set to reflect the need for parking for bulk shopping, with suitable parking for larger shops.
EC13	Some amenities not accessible by public transport.	The parking standards reflect the public transport accessibility of locations. In areas of medium to

Rep ID	Main issues raised	Council response and how issues have been addressed
		low public transport accessibility, more generous car parking provision is afforded.
EC14	Time and loss of productivity accessing work without car	These concerns are acknowledged, and the Council does not seek to make journeys to work overly onerous. The accessibility mapping which has underpinned the approach to parking standards only considers journeys to work of less than 45 minutes at peak times on public transport. Much of the city has high levels of public transport accessibility within this timeframe, however it is acknowledged that this is not the case for some parts of Birmingham and therefore a balanced approach has been taken to ensure that sufficient parking is available for those for whom public transport is less viable.
URBAN CENTRES AND GROWTH AREAS		
UC1	Need more commuter parking for off peak workers and disabled people.	It is acknowledged that the parking supply within urban centres should be prioritised for those who have most need for it which is why the approach to urban centres includes careful parking management and enforcement. Generally, there is a good supply of parking provision at off peak times in urban centres.
UC2	Need more parking restrictions on minor roads to support local bus services.	This is an approach which BCC support in appropriate locations and we are working closely with TfWM to improve bus reliability through a variety of public transport prioritisation measures across the city.
UC3	Provide clusters of fast public EVCPs for those without off street parking.	A city-wide electric charging strategy is being produced which will include provision for fast charging, publically available on-street chargers. This will include consideration of residential requirements for on-street parking. Comment forwarded to colleagues leading on the city's EV charging strategy.
UC4	Provide free parking in Sutton Coldfield.	A Sutton Coldfield Town Centre Masterplan has been prepared by Sutton Coldfield Town Council, Sutton Coldfield Town Centre Regeneration Partnership and Birmingham City Council. This sets out connectivity and parking proposals for the town centre. Provision of free parking is not mentioned within the masterplan, however it does set out an objective to consolidate parking and promote flexible solutions.
UC5	BCC should robustly challenge the myth that	Agree, however, the Council is mindful that a balanced and localised approach is taken which also

Rep ID	Main issues raised	Council response and how issues have been addressed
	local centres need more parking.	recognises centres as important focal points for growth.
UC6	More parking enforcement/management needed in local centres.	The City Council has a large team of civil enforcement officers who work hard to enforce parking restrictions across the city's local centres. However civil enforcement officers must be allocated in a balanced way to make best use of the limited resource in this team.
SUBURBAN/ PRIMARILY RESIDENTIAL AREAS		
SR2	Don't demonise drivers.	The Council is not seeking to demonise drivers however it is not possible or desirable to sustain current levels of growth in private car usage. The impacts of private car usage on the environment, air quality, public health and congestion are very significant and it is essential that the city works to provide and promote alternative, more sustainable travel options.
SR3	Actively encourage car free development in proximity to stations.	The SPD seeks to encourage car free development where appropriate. The zonal approach ensures that car free development is encouraged in locations with high public transport accessibility. However, balance is necessary to ensure that such developments do not generate 'overspill' parking issues should residents still choose to own their own vehicle.
SR4	Ban parking of commercial vehicles and vans on residential streets.	
SR5	Balance residential and visitor parking.	The Council agrees that it is important to balance visitor and resident parking. The revised standards seek to ensure that sufficient parking is available for both residents and visitors and is provided in an efficient.
SR6	Concern that commuters are parking on residential streets all day.	These concerns are acknowledged and where possible the Council will seek to discourage such commuter parking through parking controls such as short stay limits (for local centres) and residents permit schemes. However, it should be noted that implementation of controlled parking schemes can be very resource intensive and will be delivered in a prioritised way looking at locations with highest levels of parking pressure first.
SR7	New residential developments should not provide zero parking on the premise there is on street parking available.	Zero parking provision will be based on a site's accessibility to public transport and car ownership levels. Where parking surveys can demonstrate that there is on-street parking surplus, it may be deemed appropriate for some residential development to utilise this. The parking standards for the

Rep ID	Main issues raised	Council response and how issues have been addressed
		city centre, where such developments are encouraged, are designed to promote car free living, with access to car clubs as an alternative should occasional car use be required. Further clarity has been added to the SPD to explain that zero parking developments must be promoted and managed as such.
SR8	New developments provide too little parking which has led to on-street /pavement parking.	The SPD seeks to avoid this by ensuring that developments with lower levels of parking provision are focussed in areas with highest accessibility to alternative transport modes. They should also be supported by local parking control measures as well so that on-street parking can be enforced.
SR9	Must improve cycling and walking infrastructure	The Council strongly supports improvements in cycling and walking infrastructure and has undertaken a significant amount of work to increase the uptake of cycling and walking through the Birmingham Cycle Revolution. In total, £58 million has been spent on highway schemes, off-road schemes including canal towpaths and green routes, and a range of supporting measures. Further proposals regarding cycling and walking in the city are set out in the Birmingham Cycling and Walking Strategy, which includes the Local Cycling and Walking Infrastructure Plan. The plan details the infrastructure priorities for cycling and walking in Birmingham.
CONTROLLED ON STREET PARKING		
CP1	General support for management of residential parking and preventing commuter parking blocking residential streets.	Support noted.
CP2	Each dwelling should only be allowed one parking permit, or there should be higher additional charges for extra permits.	It is agreed that permit allocation should be limited in locations where they are highly in demand. A review of permit allocation processes will be undertaken separately to the Parking SPD.
CP3	Concern regarding the approach to HMOs and whether this will lead to overspill parking. Further clarity sought on how the HMO approach will be delivered.	The concerns regarding HMO parking are acknowledged and the SPD seeks to ensure that HMOs does not create additional parking pressure in residential areas. Further clarity is provided within the SPD text to explain the Council's approach to HMO parking.

Rep ID	Main issues raised	Council response and how issues have been addressed
CP4	Some responses stated that HMOs should not be allowed any parking allocation, or it should be strictly limited to ensure a prevalence of HMOs does not create excess parking pressure.	A balanced approach needs to be undertaken to ensure HMO development does not lead to increased parking pressure. Further clarity is provided within the SPD text to explain the Council's approach to HMO parking.
CP5	Powered two-wheeler parking should be provided/retained in all controlled parking schemes. Request that this is free parking.	It is agreed that powered two-wheeler parking should be given consideration when controlled parking schemes are implemented, however it may not always be possible to provide additional powered two-wheeler provision, or to guarantee free parking. Text has been added regarding consideration of powered two wheeler provision when controlled parking schemes are delivered.
CP6	Greater enforcement of controlled parking is required.	<p>The City Council has a large team of civil enforcement officers, employed through NSL, who work hard to enforce parking restrictions across the city. This is a huge task given the size of Birmingham and the density of streets on which there are parking restrictions.</p> <p>The Council issues an Annual Parking Report which details enforcement activity and how the authority is meeting its' enforcement obligations. A team of Civil Enforcement Officers (CEOs) employed through NSL ensure that the parking restrictions throughout Birmingham are enforced as well as delivering additional benefits under the Birmingham Business Charter for Social Responsibility.</p>
CP7	Question the resource required to effectively manage controlled parking (civil enforcement officers).	It is acknowledged that it is important to have sufficient resource to effectively manage controlled parking schemes. However the delivery of any parking scheme will include a Full Business Case that considers resource implications and ensures they are manageable. The Annual Parking Report sets out the financial statistics for all parking enforcement activity in the city.
CP8	Pavement parking should be addressed through parking controls.	The government have proposed national legislation which would support local authorities in tackling pavement parking. The Council has submitted a response to the government consultation on these proposals which outlines our support for greater controls to ban pavement parking and enforce this. Further text has been added to the SPD regarding pavement parking.
CP9	Further detail/specifics required on how controlled parking will be prioritised/	The Parking SPD sets high-level principles for parking, but detailed technical notes will be produced that set out specifics on scheme prioritisation and delivery for controlled parking.

Rep ID	Main issues raised	Council response and how issues have been addressed
	delivered.	
CP10	Significant concerns regarding antisocial/ dangerous/ illegal parking, particularly in residential areas.	Concerns regarding dangerous, inconsiderate and illegal parking are acknowledged. The Council enforcement team and the police work closely together to help tackle such parking issues. The government have proposed national legislation which would support local authorities in tackling pavement parking. The Council has submitted a response to government consultation on these proposals which outlines our support for greater controls to ban pavement parking and enforce this. Further text has been added to the SPD regarding pavement parking.
CP11	Parking Zones must consider residents, especially those on low incomes. Consider relevant housing legislation and whether parking restrictions may impact tenancy conditions.	These are valid considerations for the implementation of controlled parking zones. Whilst the SPD sets out a high-level approach to parking in the city, delivery-specific considerations such as these will be set out in a technical note regarding Controlled Parking. Any controlled parking scheme will include detailed consultation with location residents, businesses and relevant housing associations.
PARK AND RIDE		
PR1	Strong support for additional park and ride provision, although there were also comments which felt park and ride encourages short car journeys and is not appropriate.	Park and Ride can deliver environmental enhancements, reduce congestion and support economic growth and activity by improving access to labour markets and facilitating business travel. It is agreed that park and ride can encourage short car journeys in some instances. Therefore additional text has been included in the SPD which notes the importance of discouraging short car trips to park and ride facilities and refers to the 'last mile' transport policy approach within the Birmingham Transport Plan.
PR2	Some responses did not recognise station car parks as park and ride provision and feel the city requires dedicated bus park and ride provision close to the city centre.	Subject to further funding being found, TFWM are looking at a number of other sites in close liaison with local councils for the delivery of new car parks or Park & Ride expansions. These include new car parks on the A34 and at Minworth for express bus/Sprint.
PR3	Significant concern regarding the management of commuter on-street parking in residential streets around	Whilst the approach to park and ride sites is being led by TfWM as part of a regional Park and Ride Strategy, the Council will work closely with our Combined Authority colleagues to ensure that the approach taken ensures provision of Park and Stride parking at stations is of greatest possible

Rep ID	Main issues raised	Council response and how issues have been addressed
	stations. Requests for additional enforcement of this and some requests for expansion of station car parks.	benefit to the wider transport network. The SPD includes a commitment to ensuring parking control measures on local roads are considered as part of the strategy and managing Park and Ride. It should be noted that provision of controlled parking measures can be very costly and time-consuming to implement. Locations around stations are generally considered a priority, if significant parking issues are demonstrated, but implementation of such measures will always be budget dependant.
PR4	Against large park and ride schemes - create congestion and emissions in suburban areas.	It is acknowledged that wider parking control measures may be required in some areas around Park and Ride sites to prevent overspill parking issues. Birmingham City Council will seek to ensure that parking control measures on local roads and associated costs are factored in when considering new park and sites and managing existing park and ride sites.
SCHOOL PARKING		
SP1	Strong concern regarding parking levels outside schools and strong support for encouraging walking.	Support noted.
SP2	Requests for pavement parking controls and anti-verge parking measures such as double kerbing.	The government have proposed national legislation which would support local authorities in tackling pavement parking. The Council has submitted a response to government consultation on these proposals which outlines our support for greater controls to ban pavement parking and enforce this. Further text has been added to the SPD regarding pavement parking.
SP3	Scepticism about school 'park and stride' approach and whether this will just push parking problems elsewhere at school-run times.	The park and stride approach ensures that the immediate vicinity outside a school is kept as car-free as possible for the safety of all pedestrians. Asking parents/carers to park further away from a school and walk the remaining distance to school helps to dissipate/dilute localised parking issues rather than just pushing them elsewhere. It also supports air quality issues and promotes active and safe travel behaviours for children. These approaches will always require some local consideration for the circumstances of individual schools which is why the council supports the production of individual School Travel Plans through the Modeshift STARS resource.
SP4	Requests for parking to be completely	The SPD recognises that parking outside school can be major concern for pupil strategy and air

Rep ID	Main issues raised	Council response and how issues have been addressed
	banned/ strongly restricted in the vicinity of schools.	quality. The Road Safety Strategy for Birmingham sets out the city's approach to parking management on roads near schools. The City Council will encourage a 'park and stride' approach for parents and pupils who are unable to walk or cycle to school.
CAR CLUB BAYS		
SP5	Whilst the Car Club option is useful and good, how would this be guaranteed by the applicant if no car clubs are interested in serving the proposed location Could this be an alternative to providing parking, rather than in addition to - or if you had a Zone C site but put in some car club bays then you could be treated as a Zone B site?	<p>The Council will encourage car clubs as an alternative to car parking provision in new developments, particularly in the city centre and locations with high public transport accessibility.</p> <p>Car Clubs are a nationally recognised tool for reducing car ownership and usage. As detailed in the Car Club section of the SPD, provision of this facility must align with nationally recognised accreditation. Therefore if a development can demonstrate that it has offered the opportunity for car club provision to at least 4 accredited providers without a company accepting the opportunity, then a commuted sum may be considered for provision of on-street car club bays which are operated by our contracted on-street car club provider, Co-Wheels.</p>
DISABLED PARKING		
DP1	Significant concerns about Blue Badge abuse/ fraudulent usage and how this is enforced.	<p>As part of its commitment to tackle the problem of blue badge misuse across the City, in 2018 we employed blue badge investigation officers. These officers are in addition to the Civil Enforcement Officers who already routinely look out for invalid blue badges as part of their patrol. The investigation officers have the authority to seize blue badges where they are invalid or a driver is misusing a badge for the purpose of advantageous or free parking, and process the evidence for court, where we continue to achieve successful prosecutions.</p> <p>From August 2018 to March 2019 there were 69 cases where the blue badges were seized, of which 55 cases so far have resulted in successful prosecutions and total fines imposed by the courts of £11,388.</p>
DP2	Requests for disabled parking all to be free. Requests for private MSCP in the city centre to provide free parking for Blue Badge holders. A few responses disagreed and felt that Blue Badge holders should not	<p>The Council has no jurisdiction over the charges which private parking companies apply to their property. However, all Birmingham City Council owned Blue Badge parking is currently free to use, within the enforcement parameters set (there may be time restrictions for use for example).</p> <p>There are currently no proposals to charge for Blue Badge parking.</p>

Rep ID	Main issues raised	Council response and how issues have been addressed
	automatically receive free parking, one response suggested it should be means tested.	
DP3	Concern regarding provision for those who have mobility impairment/illness/disabilities/ short term conditions/ age-related issues which do not make them eligible for a Blue Badge but mean that alternatives to car use are not always available/an option.	The Council acknowledges and is mindful of people with greater need for car use. By providing and encouraging the use of non-car-based travel options into and around the city for all those who are able to do so, the network and parking availability will be freed up for those who have most need for private car travel. Information has been added on how Blue Badge parking is allocated/prioritised and how it can be applied for.
DP4	Rest opportunities requested for those who have limited mobility (but are not necessarily Blue Badge holders).	The SPD includes acknowledgment of the importance of rest opportunities for those with limited mobility. This is also included in the draft Birmingham Design Guide, the Walking and Cycling Strategy and will be further acknowledged in the forthcoming Birmingham Transport Plan. BCC will continue to prioritise the provision of rest opportunities in future development and public realm schemes.
DP5	Some concern regarding limited up take of disabled parking bays in car parks (particularly station car parks). It was felt this is inefficient provision.	The SPD aims to ensure that disabled bay provision is balanced, this is why for future developments the disabled parking standard ratio reduces for particularly large car parks. Demand for disabled parking bays is growing so there is likely to be increasing demand for any bays which are currently underused. However comments regarding provision in railway station car parks will be passed on to TFWM for further analysis regarding usage and whether there is justification for revisiting current levels of provision.
EV1	Concern regarding enforcement of EV bays and ensuring that they are not blocked by combustion engine vehicles.	Electric Vehicle bays on the public highway or in BCC owned car parks, are enforced by our parking enforcement team to prevent abuse by non-electric vehicles. The forthcoming Electric Vehicle Charging Strategy will include additional protocol on how EV bays will be enforced to ensure that the short stay criteria for the new charging bays is adhered to.

Rep ID	Main issues raised	Council response and how issues have been addressed
EV2	More provision is needed for rapid charging on street.	An electric charging strategy is being produced which will include provision of fast charging, publicly available on-street chargers.
Z1	Requests for clarity on how the zone boundaries are set.	Explanation of how the zones have been determined is set out in the SPD.
Z2	A number of site specific references were received where it is felt the zone allocations are not correct. Generally, these feel that certain areas are more accessible than the zone allocated	All site specific zone queries have been assessed to determine if the boundary demarcations should be altered. No changes have been seen as appropriate following this review, however where developments wish to provide lower levels of parking provision due to locally evidenced accessibility levels the parking standards will accommodate this.
PARKING STANDARDS		
PS1	Developments of 40 or more staff should have to provide shower and changing facilities for cyclists.	The SPD has been amended to provide greater clarity on when changing facilities/ shower developments will be required.
PS2	A number of responses feel that provision for cyclists is too low/unambitious and should match Birmingham Cycle Revolution aspirations for future levels of cycling.	In general, the cycle parking standards require at least 1 cycle stand for every 10 people which aligns with Birmingham Cycle Revolution ambitions. Cycle parking levels for education uses have been reviewed and have been amended so it is consistent with other uses and provide for higher levels of cycle parking provision
PS3	Questions over whether zones A and B should be referred to as 'well served' for walking and cycling.	It is acknowledged that, whilst the accessibility mapping exercises looks at public transport accessibility, a comprehensive walking and cycling accessibility mapping exercise has not been undertaken. Therefore, it is not appropriate to deem all locations within zones A and B as 'well served' for walking and cycling. The SPD has been carefully aligned with the Walking and Cycling strategy and the Local Cycling and Walking Infrastructure Plan to ensure that areas which have been highlighted as needing walking and cycling infrastructure improvements are prioritised in the infrastructure plan. Investment in these locations can then be sought through funding opportunities and developer contributions where appropriate. Reference to walking and cycling in zones A and B has been amended to remove blanket reference as 'well served'. Reference has

Rep ID	Main issues raised	Council response and how issues have been addressed
		been added regarding the prioritisation of walking and cycling investment according to the LCWIP.
PS4	Motorcycles need greater consideration/provision including appropriate facilities and design/location guidance.	The SPD has been revised to include further guidance for powered two wheelers, including information on design and location of motorcycle parking. The SPD also signposts to the Design Guide, which includes further detail on design best practice.
PS5	Not enough provision for visitor parking for residential	The Council agrees that it is important to balance visitor and resident parking. The revised standards seek to ensure that sufficient parking is available for both residents and visitors and is provided in an efficient.
PS6	Not enough provision for visitor parking for businesses in zone B	The standards for zone B have been adapted to ensure that where businesses have a specific visitor parking requirement this can be accommodated for, with sufficient evidence. However the overall levels of parking provision, outside of visitor parking, are felt to be appropriate.
PS7	Feel the current parking standards are not fit for purpose.	This is why revised standards have been proposed.
PS8	C3 Dwelling Houses in Zone C: car parking maximums for 3-bed should be 2 spaces not 2.5 and for 4+-bed should be 2.5 spaces not 3. Reason: to deliver higher density development and/or more green space, and to reduce car dependency.	In setting parking standards, consideration must be given to car ownership levels and public transport accessibility. The residential parking standards have been reviewed and simplified.
PS9	D1 development outside Zone A needs more than 1 space per 2 staff; should be 2 spaces per 3 staff. Reason: most staff in education have to drive to work because public transport into residential areas is inadequate, and therefore to avoid staff parking on residential roads.	The Council considers this to be a reasonable level of provision which is consistent with other local authorities.

Rep ID	Main issues raised	Council response and how issues have been addressed
PS10	D2 Assembly and Leisure development in Zone A should not be permitted 1 car parking space per 20 seats and should instead be limited to Disabled parking only as other use classes. Reason, no good reason to treat differently to other uses.	The justification for provision of some parking allocation for these developments is that public transport accessibility can be more limited in off peak periods so we are aiming to provide for those venues which have evening and off-peak events that may require additional parking provision.
PS11	Costs for new houses will be unaffordable with EV chargers.	A Financial Viability Assessment (FVA) prepared by BNP Paribas Real Estate (November 2019) (EBD71) to support the Development Management in Birmingham Document. This was undertaken in line with the National Planning Policy Framework and National Planning Practice Guidance. The FVA assumes that 100% of spaces will require a charging point, which significantly exceeds the number of electric cars currently in use in the UK (which is currently 0.5% of all vehicles). The assumption of 100% of spaces exceeds current levels of supply. The FVA concludes that this does not have a significant impact on viability. (See sections 3.16, Table 4.5.1 and 5.5 in FVA).
PS12	Should be higher levels of provision for electric vehicles – ‘at least 1 in 2 spaces’.	Whilst high levels of provision for electric vehicle charging will be supported, it is not felt viable to insist on a 50% level of charging provision for all types of parking. There is a cost implication to providing charging units. There is also not a need for electric vehicles to charge every time they stop. So, at some destinations rapid chargers where a vehicle can ‘top up’ quickly and then park elsewhere may be a more sensible approach. Publicly available charging units will be provided across Birmingham to help support and encourage the uptake of Electric Vehicles.
PS13	Standards should include space for wheelie bins which can end up blocking pavements otherwise.	Design guidance on waste storage provision is set out in the draft Birmingham Design Guide.
PS14	Some respondents felt the parking standards are too complicated to understand and comment on	We have endeavoured to make the parking standards as clear as possible, however a great deal of information and differentials must be included to ensure that appropriate provision is set for a wide variety of land uses and types of parking requirement. The SPD has been amended to make the standards easier to understand and worked examples have been provided.

Appendix C Survey Data from all BeHeard Responses

Are you responding to this consultation as:

Option	Total	Percent
An individual citizen	198	94.29%
A representative of a group or organisation (including elected members)	12	5.71%
Not Answered	0	0.00%

Where do you usually work?

Option	Total	Percent
I work in Birmingham city centre	87	41.43%
I work elsewhere in Birmingham	37	17.62%
I work outside Birmingham	25	11.90%
I work from home	15	7.14%
Not applicable	30	14.29%
Not Answered	16	7.62%

How often do you travel in Birmingham by the following types of transport?

Walk

Option	Total	Percent
5 days per week	40	19.05%
2-4 days per week	30	14.29%
Once per week	13	6.19%
Once per month	7	3.33%
Less than once a month	11	5.24%
Never	45	21.43%
Not Answered	64	30.48%

Cycle

Option	Total	Percent
5 days per week	16	7.62%
2-4 days per week	20	9.52%
Once per week	7	3.33%
Once per month	3	1.43%

Less than once a month	13	6.19%
Never	87	41.43%
Not Answered	64	30.48%

Public transport

Option	Total	Percent
5 days per week	28	13.33%
2-4 days per week	25	11.90%
Once per week	23	10.95%
Once per month	31	14.76%
Less than once a month	30	14.29%
Never	25	11.90%
Not Answered	48	22.86%

Motorcycle

Option	Total	Percent
5 days per week	4	1.90%
2-4 days per week	3	1.43%
Once per week	2	0.95%
Once per month	2	0.95%
Less than once a month	4	1.90%
Never	117	55.71%
Not Answered	78	37.14%

Car or van

Option	Total	Percent
5 days per week	44	20.95%
2-4 days per week	45	21.43%
Once per week	31	14.76%
Once per month	18	8.57%
Less than once a month	22	10.48%
Never	21	10.00%
Not Answered	29	13.81%

Taxi (including services such as Uber)

Option	Total	Percent
5 days per week	1	0.48%
2-4 days per week	1	0.48%

Once per week	12	5.71%
Once per month	31	14.76%
Less than once a month	46	21.90%
Never	47	22.38%
Not Answered	72	34.29%

Do you or someone you regularly travel with have a Blue Badge for disabled parking?

Option	Total	Percent
I have a Blue Badge	11	5.24%
Someone I regularly travel with has a Blue Badge	12	5.71%
No	170	80.95%
Not Answered	18	8.57%

If you drive a car or motorcycle to these places, where do you usually park?

Home

Option	Total	Percent
I do not drive here	9	4.29%
My private garage or driveway	118	56.19%
Shared private parking	7	3.33%
On-street near home (for free)	31	14.76%
On-street near home (paid for)	2	0.95%
Somewhere else near home	3	1.43%
Not Answered	40	19.05%

Work

Option	Total	Percent
I do not drive here	58	27.62%
Car park provided by my employer (for free)	48	22.86%
Car park provided by my employer (paid for)	9	4.29%
On-street near work (for free)	13	6.19%
On-street near work (paid for)	4	1.90%
Other car park (for free)	1	0.48%
Other car park (paid for)	24	11.43%
Somewhere else near work	9	4.29%
Not Answered	44	20.95%

Shopping or leisure activities in Birmingham city centre

Option	Total	Percent
I do not drive here	58	27.62%
Car park (for free)	12	5.71%
Car park (paid for)	69	32.86%
On-street (for free)	22	10.48%
On-street (paid for)	4	1.90%
Somewhere else in Birmingham city centre	7	3.33%
Not Answered	38	18.10%

Shopping or leisure activities elsewhere in Birmingham

Option	Total	Percent
I do not drive here	23	10.95%
Car park (for free)	54	25.71%
Car park (paid for)	52	24.76%
On-street (for free)	30	14.29%
On-street (paid for)	5	2.38%
Somewhere else near shopping/leisure facilities	6	2.86%
Not Answered	40	19.05%

Organisations

Thinking about the location of the postcode of your group or organisation:

How many people work here (paid or voluntary)?

Option	Total	Percent
0	0	0.00%
1-10	3	1.43%
11-50	4	1.90%
51-100	0	0.00%
Over 100	4	1.90%
Not Answered	199	94.76%

How many car parking spaces do you provide here including spaces for disabled users and electric vehicle charging points?

Option	Total	Percent
0	3	1.43%
1-10	3	1.43%
11-50	1	0.48%
51-100	1	0.48%
Over 100	2	0.95%
Not Answered	200	95.24%

How many car parking spaces for disabled users do you provide here?

Option	Total	Percent
0	5	2.38%
1-10	3	1.43%
11-50	1	0.48%
51-100	0	0.00%
Over 100	0	0.00%
Not Answered	201	95.71%

How many electric vehicle charging points do you provide here?

Option	Total	Percent
0	8	3.81%
1-10	2	0.95%
11-50	0	0.00%
51-100	0	0.00%
Over 100	0	0.00%
Not Answered	200	95.24%

How many motorcycle parking spaces do you provide here?

Option	Total	Percent
0	7	3.33%
1-10	2	0.95%
11-50	1	0.48%
51-100	0	0.00%
Over 100	0	0.00%
Not Answered	200	95.24%

How many bicycle parking spaces do you provide here?

Option	Total	Percent
0	6	2.86%
1-10	3	1.43%
11-50	0	0.00%
51-100	1	0.48%
Over 100	0	0.00%
Not Answered	200	95.24%

Do you generally agree with the approach to city centre on-street parking?

Option	Total	Percent
Yes	105	50.00%
No	88	41.90%
Don't know	15	7.14%
Not Answered	2	0.95%

Do you generally agree with the approach to city centre off-street parking?

Option	Total	Percent
Yes	98	46.67%
No	91	43.33%
Don't know	20	9.52%
Not Answered	1	0.48%

Do you generally agree with the approach to edge of city centre parking?

Option	Total	Percent
Yes	107	50.95%
No	76	36.19%
Don't know	24	11.43%
Not Answered	3	1.43%

Do you generally agree with the approach to parking in urban centres and local growth areas?

Option	Total	Percent
Yes	107	50.95%
No	62	29.52%
Don't know	38	18.10%
Not Answered	3	1.43%

Do you generally agree with the approach to residential parking?

Option	Total	Percent
Yes	123	58.57%
No	55	26.19%
Don't	25	11.90%
Not Answered	7	3.33%

Do you generally agree with the approach to controlled parking?

Option	Total	Percent
Yes	109	51.90%
No	64	30.48%
Don't know	32	15.24%
Not Answered	5	2.38%

Do you generally agree with the approach to park and ride?

Option	Total	Percent
Yes	128	60.95%
No	50	23.81%
Don't know	27	12.86%
Not Answered	5	2.38%

Do you generally agree with the approach to school parking?

Option	Total	Percent
Yes	131	62.38%
No	39	18.57%
Don't know	34	16.19%
Not Answered	6	2.86%

Do you generally agree with the approach to parking for disabled people?

Option	Total	Percent
Yes	143	68.10%
No	31	14.76%
Don't know	28	13.33%
Not Answered	8	3.81%

Do you generally agree with the parking standards zone characteristics and locations?

Option	Total	Percent
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Yes	105	50.00%
No	53	25.24%
Don't know	45	21.43%
Not Answered	7	3.33%

Do you feel that the information provided has enabled you to make an informed comment on the proposals?

Option	Total	Percent
Yes	152	72.38%
No	51	24.29%
Not Answered	7	3.33%