

## **Appendix 2 - Objection Summaries and Responses: Parking Standards Guidance Note**

	<b>Obj No</b>	<b>Paragraph</b>	<b>Objection summary</b>	<b>Response</b>
Sainsbury's Supermarkets Ltd	1		The maximum parking standards outlined in the document do not accord with those set out in Appendix D to PPG13.	Appendix D to PPG13 needs to be read in conjunction with paragraphs 49 - 56, where it states "Local Planning Authorities may adopt more rigorous standards, where appropriate, subject to the advice in the guidance. It is only the residential parking standards that have been reviewed, all other standards remain the same as those previously adopted.
Sainsbury's Supermarkets Ltd	2		The proposed mathematical formula to calculate 'accessibility discounts' for new development appears overly complex, confusing and unnecessary. This fails to accord with the guidance set out in PPS12 aimed at ensuring that development plans are clear and straightforward for all users. It is considered that the document should be consistent with the standards set out in PPG 13, providing a relatively straightforward, simple and	The accessibility questionnaire in the document has not been reviewed and therefore remains the same as that which has been previously adopted. Originally the accessibility discount applied to all development, however, this now no longer applies to residential development.

			clear method of calculating parking levels required within new development.	
Hannick Homes & Developments	2	HHD welcome the plan but would suggest sector 1 definition is shown on an enlarged plan for clarity. Furthermore HHD consider that in the light of PPG13, the sector 1 definition around both the town centre and Old Town District Centre should be increased to 500 metres walking distance.	The Council agree, an enlarged plan for Sector 1 will be included in the final version of the guidance note. The Sector 1 boundary is based on existing defined boundaries for the town centre and old town, as identified in the adopted Local Plan, and the existing residents parking zones. It is therefore not appropriate to propose an amendment to the boundary at this stage.	
Hannick Homes & Developments	3	HHD note that as a minimum garages should be 6m by 3m to allow for both parking for car and cycle. There may be occasions when separate cycle provision is made for example with apartment schemes with separate cycle stores In these circumstances it would be reasonable to reduce garages to 3m by 5m.	The recommendation is in line with the guidance in 'Manual for Streets' (Para 8.3.41) which states that "larger garages can be used for both storage and cars." This storage can be for cycles but in many cases this extra area is used for general household storage. It is essential to provide adequate space for all use therefore, the minimum recommendation of 3 x 6 metres should not be compromised.	
Hannick Homes & Developments	4	HHD question the need for paragraphs 7.1 and 7.2. As the	Para's 7.1 and 7.2 provide a context on the problems that can arise from	

			guidance rightly points out the most HMO's do not require planning permission. Where HMO's do require planning permission these should be taken on their individual merits.	HMO's and the possible pressure they can put onto on-street parking if there is no associate off-street parking
Hannick Homes & Developments	5	8.1 pg 10	HHD are concerned with the legality of the Councils approach. There is also concern with the enforcement issues.	This approach has already been adopted by a number of other local planning authorities. Procedures will be set in place to ensure that future residents if applying for permits will be exempt.
Hannick Homes & Developments	6	9.1 pg 11	On the one hand it states that all housing should meet the standards but then states that rented accommodation generates a requirement for less car parking. HHD disagree with the last sentence, as all affordable housing is secured in perpetuity by legal agreement. Affordable housing for rent then a reduction in the parking standards would be entirely justified for the reasons stated in the guidance.	Paragraph 9.1 reflects research published by the Department of Communities and Local Government (DCLG) in May 2007 that identifies that tenure is a major influence on car ownership and car parking demand. This would relate to either market value property or affordable housing.
Hannick Homes &	7	11.1.2 -	Concerned about that this	The additional 6% parking for the

Developments		pg12	requirement is not in accordance with Adopted Local Plan Policy which requires 2% of dwellings from schemes over 50 dwellings to be accessible to the disabled. For residential schemes it is unclear why 6% should be over and above the parking requirement.	disabled is in accordance with the Disability Discrimination Act (DDA), and this applies where there is communal parking areas whether that is commercial or residential. This does not effect the requirement for 2% of dwellings for developments over 50 dwellings to be accessible to the disabled. Parking associated with individual dwellings should be designed with the appropriate number of parking spaces. If it is a requirement of the developer to provide level access into the dwelling from the parking area then this also does not change.
Hannick Homes & Developments	8	13.2 - pg15-16	HHD do not consider that the final sentence should apply to residential development on the assumption that all apartments are lockable, have bath/shower and room for changing.	Agree, the final version of the guidance note will omit reference to residential development from the final sentence in Para 13.2.
Hannick Homes & Developments	9	Appendix B	HHD would simply comment that the sector 1 map A definition should follow the written definition in the final paragraph for consistency.	The Council consider that Map A is consistent with the definition of Sector 1 which can be found in Para 5.3 as well as Appendix B.
Hannick Homes &	10	pg 23-24	HHD agree with fig 1 parallel	Each individual parking area shall be

Developments			parking arrangement given that 6m is required for manoeuvrability. HHD would seek clarification that where tandem parking is provided where cars face the highway that 2.4m by 4.8m is acceptable as shown in the diagram.	4.8 x 5.0 metres unless otherwise stated. For clarity reference to tandem parking will be removed from Table 3 in the final version of the guidance note.
Hannick Homes & Developments	11	pg 32	For the avoidance of doubt HHD would request that in paragraph 12 reference is made to the application of the Discounted Accessibility Assessment as this does not apply to residential development.	Agree, whilst Para 1.2 states that it is only the residential element that has been reviewed it would nonetheless be prudent to mention in the appropriate paragraph the fact that an accessibility assessment is applied to all commercial development.
The Theatres Trust	1	pg 31	Recommend the inclusion of theatres in sui generis Class Uses on page 31 otherwise your theatres will not have any parking guidelines.	It would be impossible to list all types of development that come under the 'sui-generis' classification. Car Sales is one of the most common to which the Council apply the standard as set out on page 31 of the guidance note. Parking standards of other uses within the sui-generis classification are based on site specific detail.
The New Swindon Company	1		Parking in sector 1 flats is set at 0 spaces, though some parking would be allowed based on merits. Operational parking spaces would have to be	Operational parking requirements would be looked at on a site by site by site basis.

The New Swindon Company	2	<p>provided in addition.</p> <p>Parking standards appear to work independently from a wider strategy to utilise public off street spaces like public car parks. Effectively, whilst utilising public and private car parks are discussed in this document, it's unclear how this is implemented alongside the standards.</p>	<p>The use of public car parks for residential use has not been mentioned within the document. The use of such by residents would be considered on a site by site basis, but the standards as set out apply to all development.</p>
The New Swindon Company	3	<p>The guidance requires all cycle parking to be covered. This could create additional clutter at town centre locations where casual cycle parking is provided.</p>	<p>Sheltered cycle parking is essential in encouraging cycle use, regardless of use. Such shelters should be placed in locations such that they have a positive effect on the street scene. With the availability of different designs on the market there is no reason why they should be deemed as clutter. They offer a service to the public in the same way as fingerposts, bins and telephones, and should be treated in the same manner.</p>
The New Swindon Company	4	<p>The cycle parking advice offers little clarification on what is meant by 'secure parking facilities for cycles', set out in its promise.</p>	<p>Section 13 of the guidance note clearly sets out what is required for secure parking facilities, for example the type of stand required and its Location.</p>

	The New Swindon Company	5	cycle parking may be seen as excessive at this time, given the bicycle usage generally in this country. The recent hotel application at Fleming Way seeks 171 cycle spaces and only 147 car spaces.	The level of cycle parking is reflective of a desirability to provide for current and future cycle use in line with sustainable objectives. It would be inappropriate to comment on a particular planning application as it has yet to be determined.
	The New Swindon Company	6	It would be helpful to have a transitional arrangement in place at present. Town centre parking is going from a position of accessibility discounted 1:1 parking to nothing, which is a significant change.	This is not the case as residential development within the town centre is currently subject to an accessibility discount which could range between 50 - 100%.
Ms B Packer		1	Swindon is too big now. We need proper shops in Old Town and shops in Bridge St and Regent St. There is nothing to go into town for now. Supermarkets 5 miles away are useless for people without cars. Swindon has been a nightmare for years, there is so much crime undetected, with emphasis it will only get worse. For goodness sake leave Swindon alone.	Comment noted.

WM Morrison Supermarkets Ltd	1	Morrison's consider that the base maximum standard for car parking associated with new food retail development should reflect current government guidance set out in PPG13 (one space per 14sq.m for developments of over 1000sq.m gross floorspace.	Appendix D to PPG13 needs to be read in conjunction with paragraphs 49 - 56, where it states "Local Planning Authorities may adopt more rigorous standards, where appropriate, subject to the advice in the guidance. It is only the residential parking standards that have been reviewed, all other standards remain the same as those previously adopted.
WM Morrison Supermarkets Ltd	2	Paragraph 56 of PPG13 notes that a balance has to be struck between encouraging new investment in town centres by providing adequate levels of parking, and potentially increasing traffic congestion caused by too many cars. It is noted that where retail and leisure developments are located in a town centre, or on an 'edge of centre' site as defined by PPS6.	Comment noted.
WM Morrison Supermarkets Ltd	3	Morrison's consider cycle standards should not be set at unnecessarily high levels, as they will result in the provision of spaces far in excess of the likely demand associated with	Comment noted. The standards are there to put in place facilities to enable people to use sustainable modes of travel when appropriate.

			food superstore development. This is likely to result in the inefficient use of land.	
	WM Morrison Supermarkets Ltd	4	Table 1 of the document sets out a minimum cycle parking standards. For retail and leisure development the minimum standard is a set 4 spaces plus 2 spaces per 500sq.m above 1000sq.m. It is considered that this standard is onerous and that the base minimum standards for long and short-term cycle parking with new food retail developments should relate to development over 2,500 sq.	The guidance note distinguishes between long term cycle parking (employees) and short term cycle parking (shoppers).
RK Hayden		1	pg 11, Para 9.1 Remove the provision for rented accommodation to have lesser parking provision.	There is no specific standard for rented accommodation. This would be considered on a site by site basis.
RK Hayden		2	pg16-19 Para 13.5 Figure 5 of appendix A, although a minimum separation is specified perpendicular to the direction of the Sheffield stands (i.e. with a row of stands) there is no minimum specified between rows, which is necessary if they are to be easily accessible and	Agree, the minimum distance between rows will be included in the final document.

				convenient to use. Include a specification for the minimum spacing between rows of stands.	
RK Hayden		3	pg25	Include a requirement for secure cycle parking provision (1 space per dwelling) for single family dwellings, but with it noted that a garage meeting the specified standards (6m x 3m) will provide this.	Cycle parking is a requirement for all development. Table 1 provides the detail.
	Radnor Street and Area Residents Association	2		Concerned that permit free development could encourage unsuitable and unwanted residential development.	Comment noted.
CLlr D Glaholm		1		I feel the size for parking spaces should be a minimum of 2.7m wide and if it is to be in a garden then the length should be minimum of 4.7m.	The size of a parking space is given in Government Guidance 'Manual for Street', there appears to be no justification for changing the size dimension.
	Wiltshire County Council - Transport Planning Team	1	1.3	'Reduce vehicle movements' - is a bit generic as a bike would be classed as a vehicle. Perhaps it need to be more focused on private vehicle trips.	Agreed, this will be amended in the final version of the document to 'motor vehicle trips'.
	Wiltshire County Council - Transport	2	6.1	The 'needs of cyclists such as lockers, changing and shower facilities' isn't relevant in	Agree, the final version of the document will omit reference to residential development from this

Planning Team			residential developments with flats so this last part of this paragraph needs correcting.	paragraph.
Wiltshire County Council - Transport Planning Team	3	13.2	Raises the issue of the difference between short stay cycle parking and long stay cycle parking and the different needs. The doc needs to make it clear where long stay and where short stay are needed. (it could give an example saying the required parking needs to be considered, does a location need short stay parking (e.g. covered stands for the use of the public or shoppers) or long stay parking (e.g. secure cycle compound of cycle lockers) or the combination of both (e.g. supermarket with a secure long stay parking compound for employees and covered cycle parking near the main entrance for shoppers.	An example was given of long stay provision, i.e. employment. Any additional requirement required above the standards would be assessed on individual sites and would be part of a Travel Plan for that site.
Wiltshire County Council - Transport Planning Team	4	Fig 5	What is shown here may not even work properly for a small compound of 4 bikes if the door wasn't very wide. When you	it would be impossible to show all possible compound options, and therefore any proposal would be assessed individually.

have a row of stands, to get a bike out from a stand at one end and then wheel it into the door you'd need a clear width of about 1.5m behind the row of bikes. Therefore to allow the possibility that the stands are quite far from the wall and also for dodgy parking of bikes I'd suggest the compounds needs to be 4m deep. I'd suggest you show a diagram of a compound of say 6 stands deep with a door in the middle with these dimensions on it.

Wiltshire County Council - Transport Planning Team	5	Table 1 c3	1 cycle space per unit is too few if you imagine how many people can be in one dwelling, it needs to be 2 spaces as a minimum. There are considerably more cycles in the UK than cars but it often seems to be thought acceptable to provide less space for a cycle parking than car parking.	This is an existing standard and has not been revised.
Wiltshire County Council - Transport Planning Team	6	Table 4	If it is acceptable to drop the level of car parking provision for flats in sector 1 why does the level of car parking for dwellings	Car ownership for individual dwellings is always higher and as the majority of developments in Sector 1 propose flats rather than individual dwellings it

		stay at the same level? I'd suggest this level sector should also be reduced as all these people have the same travel choices.	was felt prudent at this time to only change this particular standard.
Wiltshire County Council - Transport Planning Team	7	Ideally each dwelling should have its own secure cycle parking. In the case of houses this should be a garage, a shed or a locker. If a garage isn't possible a shed or locker would be ideally be in the back garden. ( with a convenient gate to avoid having to take the bike through the house). Failing this a cycle locker could in theory be provided outside the front of the house but I'd suggest unless the locker is very good and is overlooked it may not be ideal).	Comment noted.
Wiltshire County Council - Transport Planning Team	8	With flats individual cycle lockers could be provided (preferably in a private area - e.g. in a secure car parking compound behind the houses) or alternatively a secured covered compound with	Comment noted.

sheffield stands could be provided. Covered sheffield stands are useless for long stay in residential units - one of my colleagues here lives in a flat and has his bike stolen from a covered stand on the site. He wont be replacing it so there is one less cyclist. Compounds always seem potentially difficult to me, either everyone has a key of there is a code on the door - one way or another they are likely to need some managing so this would have to be done by the manager of the flats.