

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

	<i>Obj</i>	<i>Paragraph</i>	<i>Objection summary</i>	<i>Response</i>
Bishopstone Parish Council	1	pg 4	Can see no difference at all between the proposed standards for developments less than 5 or greater than 5 dwellings so wonder why two specific sections (C3i) and C3ii) are necessary.	The Guidance has been revised to provide clearer guidance on the parking requirements.
Bishopstone Parish Council	2	pg 5, C3(ii)	Can see no difference at all between the proposed standards for developments less than 5 or greater than 5 dwellings so wonder why two specific sections (C3i) and C3ii) are necessary.	The Guidance has been revised to provide clearer guidance on the parking requirements.
Bishopstone Parish Council	3	pg 4, C3(i)	Disagree that a full-size garage should only be counted as 0.5 space. This not only seems unfair on the developer but also means that we are in danger of over-providing for parking altogether. As the proposed maximum per plot is 1.5 and the requirement is 2.0 this automatically gives rise to an on-street requirement of at least 0.5 spaces per dwelling (other than 1 bed flats). We believe this is inadequate. Would rather see a specific policy for rural areas and secondary villages, e.g. Bishopstone whereby parking is all on plot and no on street parking.	A garage will be counted as a parking space where it meets a minimum size requirement, 3metres x 6 metres internal dimension.

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Bishopstone Parish Council	4	pg 5, C3(ii)	Disagree that a full-size garage should only be counted as 0.5 space. This not only seems unfair on the developer but also means that we are in danger of over-providing for parking altogether. As the proposed maximum per plot is 1.5 and the requirement is 2.0 this automatically gives rise to an on-street requirement of at least 0.5 spaces per dwelling (other than 1 bed flats). We believe this is inadequate. Would rather see a specific policy for rural areas and secondary villages, e.g. Bishopstone whereby parking is all on plot and no on street parking.	A garage will be counted as a parking space where it meets a minimum size requirement, 3 metres x 6 metres internal dimension.
Chiseldon Parish Council	2		Require that any planning application to convert a garage to living accommodation only be granted provided the applicant can accommodate the new parking standards within the curtilage of the property.	A loss of a garage should not have a detrimental impact on parking provision, i.e.. the existing number of spaces should be maintained. Highways would require that on the site.
David Wilson Homes Southern Region	3		The specification that the maximum parking in any plot shall be 1 garage/carport and a parking space for large dwellings (4 bedrooms and above) appears to fly in the face of these intentions and the Local Plan Policy which encourages low density executive housing. It would be preferable to amend the note regarding maximum parking on plot to specifically refer to large dwellings.	Proposals are standards for dwellings, this can be on or off plot. Research into unallocated off-plot parking has indicated that the availability of off-site unallocated parking leads to a reduction in the total requirement for on-site provision.
Hannick Homes & Developments Ltd	1		Revisions are premature pending the final version of 'Manual for Streets'. Further changes may be required to ensure the revised standards accord with the final version of Manual for Streets.	The Guidance has been reassessed against the final version of the 'Manual for Streets'.
Hannick Homes & Developments Ltd	3	5	The revised standards fail to provide any guidance on potential sites that meet the guidance in Para 5, for example affordable housing schemes where occupants are less likely to have cars.	Research on residential parking by the Department of Communities and Local Government (DCLG) has shown that it is tenure and not the market value of housing that influences parking use.

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Hannick Homes & Developments Ltd	4	6	The increase in car parking space from 4.8 metres to 5 metres in length is unjustified by any technical work. It is also contrary to draft 'Manual for Streets' (Para 9.19). Request that standard be amended from 5 metres to 4.8 metres.	Agree, the standard has been amended accordingly, in line with 'Manual for Streets'.
Hannick Homes & Developments Ltd	6	8	The guidance on car ports appear onerous, as by definition they do not have garage doors and for security reasons they will be in all likelihood be used to park a car. Where the internal measurements are 2.4 metres by 4.8 metres and clear of obstruction there is no technical justification not to count car ports as 1 space. The draft 'Manual for Streets' states at Para 9.14.11 that they should always count towards the parking provision. Suggest amend Para 8 to "...have minimum clear internal dimensions of 4.8 metres length and 2.4 metres width".	Agree, the standard has been amended accordingly, in line with 'Manual for Streets'.

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Hannick Homes & Developments Ltd	7	10	The revised approach to the town centre appears reasonable against the approach advocated by 'Manual for Streets' (Para 9.3.9). However the guidance only appears to sanction reduced parking when a sum of £10,000 is provided to the council. This approach is not in accordance with the appropriate tests for planning obligations, is wholly unnecessary in respect of advice in the 'Manual for Streets' (Para 9.39) and would place an undue burden on town centre schemes to provide the maximum standard albeit that any discount on site is met elsewhere in town centre car parks. This fails to meet the circumstances set out in the 'Manual for Streets' where the particular occupier does not have a car. It seems wholly wrong to force householders who do not have a car to pay for a car parking space somewhere else in the town centre. A greater discount factor should be used given the greater accessibility to public transport and other facilities.	The payment of commuted sums towards the provision of public car parking has been removed from the guidance. The standard for flats in the town centre is now zero to reflect the sustainable location.
Hannick Homes & Developments Ltd	8	10	The approach to Old Town is also out of step. Fail to see the direct relationship for a scheme in Old Town to pay £10,000 for the provision of and or operation of car parks in the town centre. This is completely at odds with the circular on planning obligations. Consider that the area applied should be increased to allow for a walking distance of the centre of 500 metres. Also the discount factor should be higher given the locations greater accessibility to public transport and other facilities.	The payment of commuted sums towards the provision of public car parking has been removed from the
Hannick Homes & Developments Ltd	9	pg4&5	Objection is raised to the counting of garages (where they meet required dimensions) as 0.5 of a space. There is some inconsistency as within controlled parking zones they count as 1 space. The draft does not justify this inconsistent approach.	Garages now count as 1 parking space where they meet minimum size requirement, 3 metres x 6 metres internal dimension

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Hannick Homes & Developments Ltd	10	pg4&5	The 'Manual for Streets' suggests that counting garages should be done on a scheme by scheme basis (Para 9.4.11). The justification is based on research of garage use in the NDA, garages in the NDA are a size previously considered acceptable. It is not acceptable to penalise developers who build larger garages on the purchasers desire of whether to use the garage or not. This is outside the control of the planning system and is regulated by other acts, notably in relation to Highways and Traffic Regulation Orders. In order to meet 1 parking space from a garage it would be necessary to build a double garage to park 1 car, which is somewhat unreasonable. There is no reason why a larger garage with separate cycle parking should not count as one space.	Garages are now counted as a parking space where they meet minimum size requirement, 3 metres x 6 metres internal dimension.
Haydon Wick Parish Council	1	pg4,C3(i)	Three parking spaces off road for a five bed dwelling would be adequate but the proposed 1.5 off road and 1.5 spaces on road is considered to be unworkable. Off road provision should be 3 spaces.	Garages/car ports of an appropriate size are now counted as a parking space. The initial requirement is for on-site provision but part provision on street may be acceptable subject to highway safety
Haydon Wick Parish Council	2	pg5 C3(ii)	The provision for 4 bed dwellings is 2 spaces per unit but where there is a garage this is classed as only 1.5 per unit off road which is considered to be unworkable. Off road provision should be 2 spaces.	Garages/car ports of an appropriate size are now counted as a parking space. The initial requirement is for on-site provision but part provision on street may be acceptable subject to highway safety
Haydon Wick Parish Council	3	pg6, C3(iii)	The option for developers to not provide the standard level of provision for flats by payment of a commuted sum towards the provision of public car parks/park & ride will lead to insufficient parking for the residents of the flats. Provision for flats should be at the standard level.	The payment of commuted sums towards the provision of public car parking has been removed from the guidance. Any highway contributions will be site dependent. Within Sector 1 (Central Area, Old Town and Residents Parking Zones) the standard for flats is

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Haydon Wick Parish Council	4	pg 6 C3(iv)	The option for developers to not provide the standard level of provision for flats by payment of a commuted sum towards the provision of public car parks/park & ride will lead to insufficient parking for the residents of the flats. Provision for flats should be at the standard level.	The payment of commuted sums towards the provision of public car parking has been removed from the guidance. Within Sector 2 (rest of the Borough) the standard for flats is 1 per unit for 1 beds and 2 per unit for 2+ bed roomed flats.
McCarthy and Stone Developments Ltd	1		Concerned that sheltered housing has not been separated from open market housing. This can result into many car parking spaces being provided which is unsustainable. Would like to see separate parking standard for sheltered housing.	The parking standard for sheltered housing has not been changed.
Modus Properties Ltd	1		It is considered that the review of the Borough Council's parking standards is premature pending the publication of the final version of the DfT's Manual for Streets. The public consultation is fundamentally flawed as consultees are unable to assess the Council's draft revised parking standards against the advice contained within the DfT's finalised document. Therefore consider that the draft document should be reviewed against existing guidance in PPG13.	The parking standards have been reassessed against the final version of the 'Manual for Streets'.
Modus Properties Ltd	2		The draft document in effect defines minimum car parking standards for residential development (with a tolerance of +/-5%) which is inappropriate and contrary to advice contained within PPG13 (Paras 51 and	The tolerance level has been removed from the Guidance.
Modus Properties Ltd	3	pg 4 (C3 (I) & C3 (ii))	The standards are too onerous and inflexible. There are many areas other than the town centre or Old Town which are also highly accessible and where lower levels of car parking provision could be justified and should be actively encouraged in order to promote sustainable transport choices.	The new approach is flexible, with two different standards to reflect the accessibility/sustainability of Sector 1 (Central Area) in promoting sustainable travel.

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Modus Properties Ltd	4	pg 6, C3(iii) & C3(iv)	The standards for residential developments in the town centre and Old Town are too onerous and do not take proper account of the highly accessible nature of these areas. In these areas a car parking ratio of less than 1 space could be justified and should be actively encouraged in order to promote sustainable transport choices and reduce land take for urban residential developments.	The standards for flats in Sector 1 (Central Area, Old Town, Residents Parking Areas) have been revised to zero on the basis that these locations are accessible by sustainable transport modes.
Modus Properties Ltd	5	pg 6	It is considered that the commuted sum payment for every space not provided on site amounts to an incentive for developers to reduce densities in order to provide car parking 'on-site' in areas which are amongst the most sustainable locations for new residential development.	The payment of commuted sums towards the provision of public car parking has been removed from the guidance. The standard for flats in the town centre is
Modus Properties Ltd	6	pg 6	It is unclear why any commuted payment should contribute towards the provision and operation of park and ride, when the users of such facilities are generally from outside the urban area and/or the Borough.	Payment of a commuted sum has been removed from and any proposed contributions will be linked specifically to the application site.
Modus Properties Ltd	7		The revised standards are in effect introducing a blanket minimum car parking standard across the Borough. This is considered a retrograde step and is clearly contrary to current government guidance contained within PPG13 and the draft 'Manual	The Council do not consider that the guidance represents a blanket approach to parking provision. The guidance identifies a standard to which sites will be assessed on an individual basis.
Modus Properties Ltd	8		Any contribution sought should be directly linked to site location; prevailing car ownership; existing on/off street conditions; expected tenure and availability of car clubs; and only become applicable when an under provision against standards cannot be justified and may be proven to result in measurable harm to the safe and efficient operation of the adjacent highway network.	Contributions should be linked to the proposed effect of the site or to the strategic network.

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Old Town Group	1	7	The internal dimension of garages of 3.2 metres x 6 metres should be included in design codes, this is not the case at Wichelstowe which shows 2.8 x 5 metres.	The design codes for East Wichel are approved documents however in developing the design codes for Middle and East Wichel garage dimensions will be a matter for consideration in light of the revised parking standards.
Old Town Group	2	pg 4	Why does a garage count as 0.5 of a space yet a car port count as 1 space?	Car ports and garages of an appropriate size, 3 metres x 6 metres internal dimension, will be counted as one space.
Old Town Group	3	pg 6	Why should a flat be limited to one parking space, this conflicts with the standard for large dwellings?	The guidance has two different standards for flats within Sector 1 (Town Centre, Old Town and Residents Parking Standards) and Sector 2 (Rest of the Borough).
Persimmon & Redrow Homes	1		The revised standards being proposed rely heavily on the draft 'Manual for Streets' published by Government. As this has not yet been adopted, there is a danger that the standards being proposed by Swindon would not accord with national advice should there be fundamental change to the latter.	The Guidance has been reassessed against the final version of the 'Manual for Streets'.
Persimmon & Redrow Homes	2		Question the wisdom of applying the proposed approach across the board, when sites in the town centre and/or Old Town are much more accessible to required day-to-day facilities. In these areas there is surely an argument for providing less than the	The Guidance identifies two different approaches, Sector 1 applies to the town centre, Old Town and Residents Parking Areas and Sector 2 applies to the rest of the Borough. In sector 1 recognition is made of the greater access to facilities and access to sustainable modes of travel.
Persimmon & Redrow Homes	3	pg 6	Do not agree with the principle of a sum of £10,000 being paid per space not provided for because it is contrary to the appropriate tests for planning obligations. It is unnecessary in light of Para 9.39 of the 'Manual for Streets'; and places an additional burden on town centre/Old Town schemes where development viability is already a significant issue. It is wholly wrong to apply such a tariff when not all householders have	The payment of commuted sums has been removed from the Guidance.

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Persimmon & Redrow Homes	4		The provision of a garage should count as 1 parking space and not 0.5. A garage should be treated no differently than a car port. It will encourage on street parking. There needs to be consistency of application.	Garages are now counted as a parking space where they meet minimum size requirements, 3 metres x 6 metres internal dimension.
Persimmon & Redrow Homes	5	pg 2	See no justification for increasing car port/car parking dimensions from 2.4m x 4.8m to 2.4 x 5m when the national standards in 'Manual for Streets' is 2.4 x 4.8m. This has major knock-on implications for housing layouts, land takes and scheme viability. The required dimensions should be consistent with national policy standards.	Agree, the standard has been amended accordingly, in line with 'Manual for Streets'.
SBC Development Management	1		PPG3 has now been superseded by PPS3, this needs to be changed in the document and the quote that apply to PPG3 withdrawn.	Noted, the references have been amended accordingly.
SBC Development Management	2		Most permissions for houses are subject to condition requiring parking spaces/garages to be retained only for the parking of vehicles, therefore it would be difficult to justify garages counting as 0.5 spaces.	Garages are now counted as a parking space where they meet minimum size requirements, 3 metres x 6 metres internal dimension.
SBC Development Management	3		More emphasis needs to be given as to why the parking standards are being revised. It could be said that: 'Although SBC accept the spirit of PPG13 Transport in terms of reducing the reliance on the car and implementing maximum parking standards, in certain area's of the Borough, increased intensity of residential development has lead to serious on street parking problems resulting in harm for the existing residents in terms of amenity and highway/public safety, the purpose of these standards is to reduce and not add to the existing on street pressures already experienced in such congested zones. PPG13, Para 53 permits local authorities to use their discretion in setting the levels of parking appropriate for small developments so as to reflect local circumstances.	Only the residential parking standards have been amended. The background to why changes to residential parking have been undertaken is now an integral part of the document.

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SBC Development Management	4		The commuted sums for the town centre and Old Town should be removed as they serve no purpose in solving or reducing the existing parking problems within these areas as future residents could still apply for permits. A legal agreement would also be required to change the TRO, which would be uneconomical in all but the larger residential schemes, where parking should be able to be incorporated in the scheme, in accordance	The payment of commuted sums has been removed from the Guidance. The approach identified is in accordance with the recently published 'Manual for
SBC Development Management	5		Commuted payments would be unlikely to satisfy the five tests set out in Circular 05/05: Planning Obligations.	The payment of commuted sums towards the provision of public car parking has been removed from the
Swindon Police	1		There appears to be no reference to Section 17 of the Crime and Disorder Act 1998. Consideration should be given to adding a reference.	Reference to Section 17 of the Crime and Disorder Act is now made within the Guidance.
Wroughton Parish Council	1	pg 6 C3(iii) & C3 (iv)	House conversions into flats (particularly in Old Town), increases living units without increasing parking spaces putting pressure on on-street parking.	The Council recognises that proposals for the conversion of houses into multiple units will often have either off-street parking or none at all and that this a particular concern in Residents Parking Zones. This will mean that development within Residential parking Zones will be expected to enter into a legal agreement denying future residents access to parking permits. Elsewhere the standard will be required on-site or an alternative approach agreed.
Wroughton Parish Council	2	pg 6 C3(iii)	There does not appear to be a great deal of difference other than one bedroom flats reduced to one parking space. The problem will still arise with on street parking, particularly with households where there are three or more vehicles.	Research has indicated that a one bedroomed flat is considered unlikely to give rise to car ownership of the level suggested. In the town centre on street parking will be discouraged with 'Permit Free Development'.

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Wroughton Parish Council	3		A lot of houses convert garage space to living space and the majority of homes extensions increase bedroom and other living space without providing any additional	A restrictive condition is placed on new development whereby use of garages is restricted to the purpose of parking of domestic vehicles and ancillary domestic storage. The extension of homes to a level which requires additional parking would be addressed during the planning process. The local highway authority ensures that adequate parking provision remains and is not lost through additional development.
Mr G Gussefeld	1	7	Object to the allowance for a smaller garage where there is adjoining storage, this is too small. Minimum garage width should be 3 metres and minimum length 6 metres.	Garages meeting a minimum size requirement (3 metres x 6 metres internal dimension) will be counted as a parking space.
Mr G Gussefeld	2	8	A 2.8 metre car port is too narrow for opening car doors, internal width should be 3 metres.	Car Ports meeting a minimum size requirement (3 metres x 6 metres) will be counted as a parking space.