



vehicle parking standards



Local Development Framework





Warwick District Council

**Vehicle Parking Standards
Supplementary Planning Document
Background Documents**

November 2007

Background Documents

1. Statement of Consultation
2. Supporting Policy Documents
3. Non technical summary of the Sustainability Appraisal

Statement of Consultation for the Vehicle Parking Standards Supplementary Planning Document (SPD)

This document sets out the consultation which was undertaken by the Council in preparing the Vehicle Parking Standards Supplementary Planning Document (SPD).

Pre Production Consultation

The following stages of pre production consultation were undertaken to inform the preparation of the Draft SPD.

Questionnaire Survey

The Council carried out a questionnaire survey to obtain information on car ownership and use by household size and type and to gather opinions on the parking standards that should be proposed in the district. This was carried out over a six week period between the 13th November and the 22nd December 2006.

The questionnaire was made available at the Council Offices at Riverside House, Leamington Town Hall, the County Council offices at Shire Hall, Warwick and at libraries across the district. It was also available at the exhibitions to publicise decriminalised parking enforcement held by Warwickshire County Council at Leamington, Kenilworth and Warwick.

The questionnaire could be accessed and completed online via the Council website and was sent by post to all those who expressed an interest in the Vehicle Parking SPD through the Statement of Community Involvement (SCI).

A pilot study was carried out with various civic groups within the district (including the Leamington, Warwick and Kenilworth societies) to ensure that the questionnaire was robust and easy to understand.

A total of 263 responses were received 92% of which were from respondents living within the district. The results of the questionnaire survey are available on the Council website at:

www.warwickdc.gov.uk/parkingSPD

Focus Groups

Two focus groups were held to examine in more detail the options for residential and destination parking standards. The first involved residents and amenity groups who had expressed an interest in attending either through the parking questionnaire or SCI (see list at Appendix 1). A separate group was held for local developers, agents, architects and other business and professional interests who had expressed an interest through the SCI or were invited from a wider list compiled in conjunction with a separate consultation exercise to consider affordable housing (see list at Appendix 1).

The issues raised, the Council's response and how it was addressed in the SPD are summarised in the following sections.

Findings of the Residents and Amenity Groups Focus Group

Residential Parking

Participants were asked to indicate the strengths and weaknesses of three approaches to setting residential parking standards proposed by the Council.

Approach 1: Single average standard for all sizes of dwelling

Approach 2: Standards to reflect different size of dwellings

Approach 3: Greater residential parking in rural areas to reflect greater car dependency.

They were also asked to suggest appropriate levels of car parking by bedroom size. The findings, along with any general issues which were raised, are summarised in the following tables.

Table 1: The strengths and weaknesses of different approaches to setting residential parking standards

Benefits / Opportunities	Costs / Constraints
Approach 1: Single average standard for all sizes of dwelling	
<ul style="list-style-type: none"> • More efficient use of land 	<ul style="list-style-type: none"> • This would not reflect differences between areas and types of development. • It allows too much flexibility for developers. • There is potential for two approaches: a single standard per dwelling or as an average across the site (i.e. 2 spaces per dwelling or an average of 2 spaces per dwelling across the site). • There is a lack of flexibility overall to meet local circumstances.
Approach 2: Standards to reflect different sizes of dwellings	
<ul style="list-style-type: none"> • It can better meet demand and reflect circumstances • It allows for better design 	<ul style="list-style-type: none"> • This does not comprehensively distinguish between different types of dwelling (e.g. retirement flats).
Approach 3: Greater residential parking in rural areas	
<ul style="list-style-type: none"> • It could reflect rural car dependence. 	<ul style="list-style-type: none"> • It does not necessarily reflect car ownership. • There is less pressure for parking from other land uses in the rural area.

Table 2: Suggested levels of parking by bedroom size

Bedrooms	Number of parking spaces						Average
	1	1.5	2	2.5	3	4	
1 bedroom	3	6	11	0	0	0	1.7
2 bedrooms	1	1	20	0	0	0	1.9
3 bedrooms	1	0	15	4	1	0	2.1
4 or more bedrooms	1	0	12	4	5	0	2.3

Table 3: Issues raised in respect of residential standards (Residents and Amenity Group)

Issue raised	Council's Response	How this is addressed in the Draft SPD
There should be a mix of allocated and unallocated parking	This has been considered at some length as unallocated parking is recognised as a way of utilising parking spaces efficiently. However, not all developments are suited to this type of parking (eg. a row of houses where parking is provided within the curtilage of each unit).	It is recommended to leave this to the applicant to determine the appropriate distribution of parking across the site.
Restrictions on parking permits should be applied as a condition on certain types of development	We are currently in discussions with Warwickshire County Council regarding this matter.	Notwithstanding this, it is included in the draft SPD for consultation purposes.
A progressive approach could be adopted which becomes tighter over time. This would involve a higher level of provision initially which would then be reduced.	This is too complex. WDC needs to set an appropriate set of standards from the outset. No development can be expected to make up a shortfall in the existing provision, only a contribution that relates in scale and kind to the development itself.	This suggestion is not reflected in the draft SPD.
Sufficient parking is needed, instead of cramming development on small sites	Agree – this is a key aim of the SPD.	This is a key aim of the SPD.
The issue of how to accommodate visitor parking was raised	Parking standards should be set at a level that allows for some visitor parking. Unallocated parking is a good way of achieving this in flats but less so for houses.	It is recommended to leave this to the applicant to determine the appropriate distribution of parking across the site.
Undercroft parking was discussed as one solution for parking in constrained town centre locations.	The Council is keen to encourage undercroft and underground parking where it can be made secure.	The draft SPD encourages the use of undercroft and underground parking.
One benefit of providing increased off street parking may be to reduce density and the over supply of housing	Agreed. However, the density of housing and level of parking provided should be appropriate to the character and context of the site and its surroundings.	The oversupply of housing is dealt with through the Housing Supply SPD.
Parking spaces are not big enough to safely accommodate vehicles and their turning	The SPD has dimensions for parking and manoeuvring.	The draft SPD has dimensions for parking and manoeuvring.
Concern over the loss of amenity caused by the 'paving over' of front gardens	This is understood, however it is largely outside the control of planning.	The draft SPD attempts to give planners a bit more control over this but it is largely beyond the remit of planning.
Will the Council provide more car parking if needed?	The Council will monitor implementation of the SPD and will review it as appropriate.	The Council will monitor implementation of the SPD and will review it as appropriate.

Destination Parking (i.e. non-residential parking)

Participants were asked to comment on three approaches to setting destination parking standards and indicate which they thought was most appropriate.

Approach 1 – PPG13 standards across the district (i.e. quite generous levels of parking*)

Approach 2 – More restrictive standards across the district

Approach 3 – More restrictive standards than PPG13 in high accessibility zones

* nb. this is not the same as the current parking regime as the new policy DP8 includes a clause that the Council will expect the maximum parking standards to be met unless the applicant can demonstrate that a lower standard is appropriate. The current regime simply allows the developer to provide anything up to the PPG13 level (subject to certain factors such as highway safety).

Table 4 – Issues raised in respect of destination parking

Issue raised	Council's Response	How this is addressed in the Draft SPD
Parking should be at a level to make Leamington commercially attractive	It is agreed that this is an important factor to take into account in setting standards.	The SPD aims to take this into account in setting standards.
Parking charges should apply to everyone	This is not a matter for planning.	This is not reflected in the SPD.
Money raised from parking charges should act like a congestion charge to fund public transport improvements	The Council is sympathetic to this view but regrets that it is not a matter for planning. Public transport improvements are primarily funded by the County Council and national government.	This is not reflected in the SPD.
A regime of paying for employee parking should be enforced.	This is not a matter for planning.	This is not reflected in the SPD.
Issue of house turnover – Standards should encourage people to move within walking / public transport distance.	Restrictions on destination parking are intended to bring about a change in behaviour with greater use of public transport.	The SPD aims to take this into account in setting standards.
It was suggested that improvements to public transport will never happen.	The County Council has secured central government funding for a 'step change' in public transport provision (the 'SPARK' initiative).	n/a
People should be encouraged to use out of town car parks or park and ride (example of Oxford was given)	Agreed. This will be funded through the SPARK initiative (see above).	The SPD aims to take this into account in setting standards.
Contributions should be made to park and ride.	The Council is unable to seek car parking contributions under PPG13.	This is not reflected in the SPD.
Standards should signal that car parking will become tighter over time.	A standard needs to be set that is appropriate for the present. The SPD can be reviewed in the future.	This is not reflected in the SPD.

The issue of green travel plans was raised	This is covered briefly in the SPD. More information is provided in County Council publications.	This is covered briefly in the SPD. More information is provided in County Council publications.
It was suggested that there hasn't been enough parking in the town centres to date.	Understood.	The SPD aims to take this into account in setting standards.
Policy should facilitate parking for shops and tighten up for employment (long stay vs. short stay)	This is a central tenet of the Council's car parking strategy.	The SPD aims to provide appropriate standards for all land uses.
Policy will have a marginal impact as it only applies to new development.	Agreed.	n/a
Innovative approaches to public transport are needed	Agreed.	n/a
Car parks should have charging points for electric vehicles	This would not be an appropriate use of the Council's resources at present, nor can it reasonably be requested of developers. Car parking can be adapted when this becomes feasible.	This is not reflected in the SPD.
Need for a policy review in 5 years / importance of national and regional policy triggers.	The SPD will be reviewed as appropriate.	n/a
The spatial variation approach should apply to employment but not to shops (i.e. it is appropriate to have more restrictive standards for employees in high accessibility locations but shops should have the same standards regardless of their location).	This is not presently reflected in the SPD but it is worthy of additional consideration in conjunction with other consultation responses on the draft SPD.	This is not presently reflected in the SPD but will be considered further alongside consultation responses on the draft SPD.

Table 5: Level of support for each approach

	Group 1	Group 2*		Comments
		Employees	Customers	
Approach 1 (PPG13 standards)	3	2	5	Will increase congestion
Approach 2 (More restrictive standards than PPG13)	5	0	0	
Approach 3 (Restrictive parking in high accessibility zones)	5	5	2	Risk of encouraging people to shop and/or locate out of town. Risk of unintended consequences
Don't know		1	1	

* some of the second 'break-out' group at the meeting considered that the spatial variation approach should apply to employment but not to shops

Findings of the Developers', Agents' and Architects' Seminar

Attendance at the seminar for business and professional interests was disappointing given the number of people who returned the slip to say they could attend. However, a useful discussion was held with those that did attend.

Residential Parking

Table 6: General comments on Residential Parking Standards

Issue raised	Council's Response	How this is addressed in the Draft SPD
The Council should be considering location as well as the number of bedrooms	The Council explained that it does not seem appropriate to tighten standards in the area immediately around the town centre as this is the area that comes under pressure from commuters and other visitors to the town centre.	The draft SPD does not vary residential parking standards by location. This is to be tested further in the main consultation.
Parking provision should be made within the curtilage of the property, in front or at the side of the dwelling to promote natural surveillance.	This view of the police (meeting its 'secured by design' principles) is of interest to the Council but needs to be balanced against other urban design considerations.	This is reflected in the SPD but is balanced with other design considerations.
Rear courtyard parking is unacceptable due to the lack of surveillance and potential for crime.	This view is acknowledged and understood but it needs to be balanced against other urban design considerations.	This is reflected in the SPD but is balanced with other design considerations.
Unallocated spaces should be confined to flat developments to enable parking within the curtilage of individual houses.	The unsuitability of unallocated spaces for certain types of units and layouts is understood.	The draft SPD leaves the distribution of parking spaces between units to be determined by the applicant.
Rural areas have greater car dependency however there is less demand for on street parking from other uses.	Agreed.	The draft SPD does not recommend higher parking standards in rural areas for this reason.
A site specific approach should be applied with restrictions placed on certain roads in the urban area.	This is too complicated. The policy should be easily understood and applied.	This approach is not reflected in the draft SPD.

Destination Parking

There was general agreement that it is appropriate to vary destination parking standards according to the degree of accessibility by non-car mode. This would fit with the park and ride scheme which aims to encourage commuters and other long stay visitors arriving from the south of Leamington and Warwick to park out of town. The following comments were made:

Table 7: General comments on Destination Parking Standards

Issue raised	Council's Response	How this is addressed in the Draft SPD
Workers and visitors should be encouraged to use park and ride to 'free up' parking spaces for residents. The spatial variation approach is therefore appropriate.	Agreed. However, the importance of further investment in public transport is recognised. The town centre standards will not be too restrictive such that the viability of the town centres are put at risk.	The draft SPD suggests that this approach is adopted.
Dedicated parking is easier to manage and means that cars are not abandoned in the street	Understood.	n/a
Approach 2 (i.e. more restrictive than PPG13 standards across the district) would not reduce the demand for parking or increase use of public transport.	This approach would only be successful if there were good public transport links to all destinations in the district.	This approach is not reflected in the draft SPD.

Consultation on the Draft SPD and SA

The Draft Vehicle Parking Standards SPD and Background Documents were approved by the Council's Executive on the 26th March 2007 for public consultation. A six week period of public consultation was carried out between the 10th April 2007 and 21st May 2007.

The Draft SPD, background documents and representations forms were made available at 11 deposit points throughout the district which included the Council House, libraries and one stop shops. The documents were also placed on the Council's website. Letters were sent out to those who had expressed an interest through the Statement of Community Involvement together with other statutory consultees. A notice advertising the consultation period was published in the local newspaper (see Appendix 2).

Summary of Representations

Representations were received from a total of 23 individuals, companies and organisations. These included:

- 5 Residents (2 undisclosed respondents)
- 3 Parish and Town Councils
- Solihull Metropolitan Borough Council
- 3 Civic Society groups
- 7 Public Bodies / Organisations / Statutory Groups.
- 4 Commercial businesses

Generally, consultation feedback was supportive of the SPD. Of the respondents, 14 indicated that they supported the principle, 7 did not specify or were unsure and 2 did not support the intention of the SPD. No objections were received to the Sustainability Appraisal which informed the production of the Draft SPD. A summary of the

representations, together with the Council's response and proposed changes is set out in full in Appendix 3.

In response to the objections raised, a number of changes all of which were considered to be minor were made to the SPD. Further wording was added to clarify and expand upon the criterion set out in sections 2.2 and 2.3 of the SPD which set out the instances through which parking below the maximum standard may be appropriate. This included clarification of what is meant by a worsening of the parking situation, and to ensure that the safety and convenience of residents and other occupiers is taken into account. Additional wording was also included to clarify the difference between high and low accessibility zones for non residential uses.

Various changes were made to the standards for particular land uses set out in table 1 and 2 of the SPD. The most significant of these was to allow a higher level of provision for two bedroom dwellings in rural areas following an objection raised by the Warwickshire Rural Housing Association. In response to this further work comparing rural and urban car ownership within the district was carried out which confirmed that car ownership is slightly higher in rural areas. Other changes included amending the standard for tennis, badminton and squash courts and for general industry and storage and distribution in high accessibility zones.

In response to comments made by Warwickshire County Council the recommended dimensions for parking spaces was amended.

There was concern that as the SPD states that the maximum standard will be appropriate in most instances the standards will actually operate as minimum standards. It was suggested that this may be contrary to government guidance which requires that local authorities set maximum standards. However this approach as set out in Policy DP8 has been endorsed by the Local Plan Inspector through the inquiry process and therefore is considered to be consistent with national guidance.

In addition, a number of other minor changes were made to the SPD to reflect internal consultation, updated guidance and to address any typographical errors.

Appendix 1: List of attendees of focus groups

Attendees (Residents and Amenity Groups Seminar)
Mr Roger Schofield
Ian Wild
Mrs J Illingworth (Kenilworth Society)
Robin Richmond (Leamington Society)
A Mendoza
D Jenkins
Sandra Cox
Cllr R Bullen (Bishops Tachbrook Parish Council)
V C Lawton
M Winn
Carolyn Gifford
J R Ashby
Jason Chubb
John Henderson
R M Andrews
Mr Stead
David Wright
James Mackay (Warwick Society)
Kirstie Clifton
Penny Wright
Mrs M Reuser
Archie Pitts (Leamington Society)

Attendees (Developers, agents and architects group)
Liberty Stone (Smith Stuart Reynolds)
Brian Bassett (Architect)
Peter Davies (Warwickshire Police)
Lindsay Shaw (Warwickshire Police)
Gary Knight (Warwickshire Police)

**Warwick District Council
Planning and Compulsory Purchase Act 2004
Statutory Instrument No. 2204 Town and Country Planning (Local Development)
(England) Regulations 2004 - Regulation 28
Warwick District Local Development Framework
NOTICE OF SUBMISSION OF
STATEMENT OF COMMUNITY INVOLVEMENT**

The Planning and Compulsory Purchase Act 2004 requires, as part of the Local Development Framework, the preparation and adoption of a Statement of Community Involvement (SCI). The Statement of Community Involvement sets out Warwick District Council's policy for involving the community in the preparation and revision of Local Development Documents and consultation on planning applications.

Warwick District Council has considered comments made on the Draft Statement of Community Involvement which was published in November 2006. A number of changes have been incorporated into the SCI document which has been submitted to the Secretary of State for Examination and Approval. The Submission document will be published for a six-week public consultation period commencing Tuesday 10th April until 17.15 on Monday 21st May 2007. The Statement of Community Involvement Submission document and accompanying documents can be viewed and downloaded from the Council's website: www.warwickdc.gov.uk/sci and are available for inspection at the locations and times given at the bottom of the notice.

Any person or organisation may make representations on the soundness of the Submission document and these will be considered by the independent Inspector appointed to hold an Examination. Those wishing to make representations should use the representation form available with inspection copies of the document and on the Council's website.

Representations relating to the Submission document can be returned as follows:

- (1) By email to: ldf@warwickdc.gov.uk
- (2) By post to: Mr J Archer, Head of Planning & Engineering, PO Box 2178
Warwick District Council, Riverside House, Milverton Hill, Royal Leamington Spa
CV32 5QH

Representations can also be accompanied by a request to be notified at a specific address of the publication of the Inspector's Report following Independent Examination and when the Statement of Community Involvement is adopted.

Only representations that are in writing (including electronically) and arrive at the address specified above within the six-week period from Tuesday 10th April until 17.15 on Monday 21st May 2007 will be considered.

**NOTICE OF PUBLIC CONSULTATION ON THE DRAFT VEHICLE
PARKING STANDARDS SUPPLEMENTARY PLANNING
DOCUMENT**

Warwick District Council has prepared a Draft Vehicle Parking Standards Supplementary Planning Document (SPD) as part of the Local Development Framework (LDF) for the District. The draft Vehicle Parking Standards SPD sets out a proposed set of parking

standards for cars, cycles and motorcycles for new developments, including redevelopments and conversions. The draft SPD, draft Sustainability Appraisal and Consultation Statement can be viewed on the Council website at: <http://www.warwickdc.gov.uk/WDC/Environment+and+planning/Planning/Parking+Standards+in+New+Development.htm> and at the locations given at the bottom of this notice.

Representations should be made on the Council's representation form which is available at the deposit points. They can be returned as detailed for the SCI above and should be submitted within the same 6 week period as the SCI, i.e. Tuesday 10th April until 17.15 on Monday 21st May 2007.

Deposit Points for the SCI and Vehicle Parking Standards SPD:

The Council Offices: Riverside House, Milverton Hill, Royal Leamington Spa; and

The Town Hall: Parade, Royal Leamington Spa

Monday – Thursday 8.45 am – 5.15 pm; Friday 8.45 am – 4.45 pm

Whitnash Town Council Office: Lammas Croft, Whitnash

Tuesday and Thursday 9.00 am – 12.00 noon

Leamington Spa Library: The Pump Rooms, Parade, Royal Leamington Spa

Monday and Thursday 9.30 am – 8.00 pm; Tuesday 10.00 am – 8.00 pm; Wednesday and Friday 9.30 am – 5.00 pm; Saturday 9.30 am – 4.00 pm; Sunday 10.00 am – 2.00 pm

Warwick Library: Barrack Street, Warwick

Monday 9.00 am – 7.00 pm; Tuesday, Wednesday and Friday 9.00 am – 5.30 pm; Thursday 10.00 am – 7.00 pm; Saturday 9.00 am – 4.00 pm

Also at **Warwick Connection** at Warwick Library open Monday, Tuesday and Friday 9.00 am – 5.30 pm;

Wednesday 10.30 am – 5.30 pm; Thursday 10.00 am – 5.30 pm

Warwickshire Direct - Kenilworth: Kenilworth Library, Smalley Place, Kenilworth

Monday and Thursday 9.00 am – 7.00 pm; Tuesday and Friday 9.00 am – 5.30 pm; Wednesday 10.30 am – 5.30 pm; Saturday 9.00 am – 4.00 pm

Lillington Library: Valley Road, Royal Leamington Spa

Monday and Friday 9.30 am – 1.00 pm & 2.00 pm – 5.30 pm; Tuesday and Thursday 9.30 am – 1.00 pm & 2.00 pm – 7.00 pm; Saturday 9.30 am – 4.00 pm

Whitnash Library: Franklin Road, Whitnash

Tuesday 9.30 am – 7.00 pm; Thursday 2.00 pm – 7.00 pm; Friday 9.30 am – 5.30 pm; Saturday 9.30 am – 12.30 pm

The Chain Community Office: Crown Way, Lillington, Royal Leamington Spa

Monday and Friday 10.00 am – 12.00 am; Tuesday 11.00 am – 12.00 noon; Wednesday 1.00 pm – 3.00 pm; Thursday 9.30 am – 12.00 noon

Brunswick Healthy Living Centre: 98-100, Shrubland Street, Royal Leamington Spa

Monday - Thursday 9.00 am – 5.00 pm; Friday 9.00 am – 4.30 pm

If you have any difficulties with reading or obtaining the SCI or the draft Vehicle Parking Standards SPD, please contact the Planning Policy section at the above address for assistance.

JOHN ARCHER

Head of Planning & Engineering

Date: 5 April 2007

Appendix 3: Summary of Representations

Respondent (Agent)	Informed about adoption	Supportive in principle	Summary of comments and suggested changes to be made to address them	WDC Response
Organisations				
Whitnash Town Council	Yes	Yes	None	n/a
Wm Morrison (Peacock & Smith)	Yes	n/a	<p>Standards in HAZs should be as in PPG13, i.e. 1 space/14 sq m for developments of over 1,000 sq m gross.</p> <p>PPS6 allows for more than the relevant maximum standard in town centre and edge of centre sites where the parking will serve the town centre as a whole. The standards should allow this flexibility.</p> <p>Cycle parking at foodstores is too onerous and should be:</p> <p>1 short-term space per 500 sq m GFA; plus 1 long-term space per 20 maximum staff on site at any one time. (In each case for developments over 2,500 sq m).</p>	<p>The Council considers the suggested standard of 1 space/50 sq m to be appropriate in HAZs (i.e. town centres). A change was made to DP8 through the Local Plan Inquiry (which was accepted by the Inquiry Inspector) that parking at sites in town centres and on the edge of town should be allowed to exceed the maximum where the parking serves the town centre as a whole (in accordance with PPG13 and PPS6).</p> <p>Your comments regarding cycle parking have been noted however the Council has already modified the standard set by other districts to make it less onerous and more in line with perceived need.</p>
British Waterways	Yes	Yes	None	n/a
Environment Agency	n/a	n/a	None	n/a
Cala Homes (Mids) Ltd	Yes	Yes	<ol style="list-style-type: none"> 1. There should be more emphasis on urban design with this given as one reason for allowing less than maximum parking provision at residences. 2. There should be a section on on-street parking, in line with guidance in 'Manual for Streets' (MfS) which allows for on-street parking, especially for visitors. 3. The SPD should recognise that courtyard parking has a role to play, depending on the situation (as 	<ol style="list-style-type: none"> 1. Urban design considerations are covered by criterion (vi) in section 2.3 of the SPD dealing with residential development. An additional sentence will be included to expand on this to state <i>'In some instances, there may be particular urban design issues such as the reuse of a listed building which, in accordance with criteria (vi), would justify car parking below the maximum standard'</i>.

Respondent (Agent)	Informed about adoption	Supportive in principle	Summary of comments and suggested changes to be made to address them	WDC Response
			<p>stated in MfS and illustrated in 'Parking, What Works Where').</p> <ol style="list-style-type: none"> 4. List all the factors in MfS when determining whether garages count as parking. 5. Include the diagram figure 8.20 in MfS. A 6m radius is not needed when the actual spaces are wider. 6. Cycle parking needs more emphasis. Put the section before car parking and include a requirement for visitor cycle parking. 	<ol style="list-style-type: none"> 2. The role of on-street parking is expressly recognised in criterion (i) of para 2.3 of the draft SPD. Also, the role of on-street parking in new development areas, in line with MfS, is recognised in the last para of section 2.1 of the draft SPD. 3. The SPD recognises many forms of parking with its reference to the publication 'Parking, What Works Where' in Section 4 on design, layout and siting. Courtyard parking may be considered appropriate provided that steps are taken to ensure that it meets the principles set out in Section 4. 4. The approach towards garages taken in the SPD is intended to give flexibility to the market. Therefore, for a 3 bedroom house, the developer can provide 2 spaces plus a garage or two spaces including a garage where the Council is convinced that the garages can be utilised. In response to another objection this is being strengthened through changes to the following sentence 'the Council will need to be convinced that the garages are sufficiently large, accessible, safe and sure that they can be utilised'. We do not consider it necessary to repeat the factors listed in MfS. 5. The Council is advised that less than 6m is not generally recommended due to the effects of driver behaviour. Each case will, however, be considered on merit with the SPD diagrams used

Respondent (Agent)	Informed about adoption	Supportive in principle	Summary of comments and suggested changes to be made to address them	WDC Response
				<p>as a guide.</p> <p>6. The requirement for visitor cycle parking is included within the overall standards.</p>
Leamington Society	Yes	Yes	<p>1 Introduction and Policy Background</p> <p>There is an apparent conflict with PPG3 and the SPD. Para 51 of PPS3 should be substituted for the existing text.</p>	<p>1 Introduction and Policy Background</p> <p>PPG3 has been superseded by PPS3 but is mentioned in the SPD to highlight the shift in policy approach. The essence of para 51 of PPS3 is reflected in the suggested text and is entirely reflected in the methodology and proposed standards.</p>
			<p>2.1 Key Principles</p> <p>Residential standards should be expressed as minimum and maximum standards with an exceptional circumstances allowance for lower levels of parking provision.</p> <p>It should be more difficult to allow standards of parking below the standard for residential development than for non-residential development.</p>	<p>2.1 Key Principles</p> <p>The standards as expressed are effectively actual standards, with less than this permitted where appropriate (hence it is also appropriate to call them maximum standards). The suggested wording, though not all that different in principle, would not fit with the parent policy in the local plan, DP8 (in particular the reasoned justification as amended to reflect the Leamington Society's objection at Revised Deposit Stage).</p> <p>The onus is on the applicant to demonstrate that parking below the maximum standard is appropriate. Given the criteria outlined in the draft SPD, it is likely to be easier to do this for non-residential parking than for residential parking, but this does not need to be expressly stated in the policy.</p>

Respondent (Agent)	Informed about adoption	Supportive in principle	Summary of comments and suggested changes to be made to address them	WDC Response
			<p>2.2 Applying the Standards to Non-Residential Development</p> <p>Criterion (i) should be modified to stipulate ‘within 100 metres of the development’ and to add the caveat ‘without detrimentally affecting the safety and convenience of any residents who may live within this area’. It is also suggested that these points are repeated later in section 2.2.</p>	<p>2.2 Applying the Standards to Non-Residential Development</p> <p>We do not consider it necessary to stipulate a distance from the development but will add the caveat ‘without detrimentally affecting the safety and convenience of residents and other occupiers’ (as appears on criterion (i) in section 2.3). It is not necessary to repeat this information later in the section but it is proposed to change ‘will not’ to ‘may not’ in the sentence proposed for amendment by this objector.</p>
			<p>2.3 Applying the Standards to Residential Development</p> <p>1. The residential standards should be defined as minimum and maximum standards with an exceptional circumstances allowance for lower levels of parking. Detailed wording changes are proposed to effect this.</p> <p>2. Criterion (iii) should be amended to read ‘There is no on-street parking demand in the vicinity of the development’.</p> <p>3. The planning application form should include a question ‘Is this development in an RPZ area’ to ensure that planning officers liaise with the County Council</p>	<p>2.3 Applying the Standards to Residential Development</p> <p>The principle of making the standard both a minimum and maximum is too convoluted and we are confident that the standards are effectively actual standards as set out in DP8.</p> <p>2. This is a useful objection because it highlights that the point needs clarification. The suggested change is wholly inappropriate because it is a <u>supply</u> point to cover those circumstances in which it is not possible to park on street (e.g. because there are yellow lines) so there can’t be the problem of greater on-street parking. It is proposed that the criteria is expanded to state ‘there is no on-street parking <i>permitted</i> in the vicinity of the development (<i>so there is no potential for on-street parking to detrimentally affect the safety and convenience of other residents and occupiers</i>)</p>

Respondent (Agent)	Informed about adoption	Supportive in principle	Summary of comments and suggested changes to be made to address them	WDC Response
			and/or District Council parking enforcement team.	3. This is included on the draft validation checklist which, it is anticipated, will be approved during late September following a period of consultation. This is however a wider matter concerning how DC implement the standards rather than an issue for this document.
			<p>4. Design, Layout and Siting of Car Parking</p> <p>There should be an Article 4 Direction prohibiting the conversion of front gardens into hard standing in Conservation Areas subject to flooding and/or in the flood plain and other sensitive areas e.g. adjacent to Conservation Areas.</p>	<p>4. Design, Layout and Siting of Car Parking</p> <p>This an important issue which will be considered as part of the forthcoming work programme. The Council will need to monitor the impact of decriminalised parking enforcement to assess if this has a detrimental impact.</p>
English Heritage	n/a	n/a	Unable to respond at this stage but may subsequently have comments on individual development proposals which effect the historic environment.	Understood.
Greywell Property Ltd	Yes	No	Many parts of the SPD are reasonable but the HMO standard has meant that Greywell Properties have not brought forward a Student Hall of Residence (SHOR) because they were unable to provide 1 space per 2 study bedrooms.	WDC do not expect SHORs to meet the HMO standard. They would be treated as a sui generis use and be considered on a case by case basis. Standard should be inclusive of this.

Respondent (Agent)	Informed about adoption	Supportive in principle	Summary of comments and suggested changes to be made to address them	WDC Response
Warwickshire Rural Housing Association	Yes	Yes	When doing affordable housing in rural areas this RSL generally applies a standard of two spaces per dwelling as the villages have poor or no public transport. If allowing for rural exception schemes this standard should be applied. The Table 2 standards should be applied to standard (ie non exception) developments.	<p>Since the draft SPD was prepared research published by the Dept for Communities and Local Government during May 2007 confirms that rural areas have higher levels of car ownership.</p> <p>Further work has been undertaken to compare rural and urban car ownership within Warwick District based on 2001 census data. This confirmed that car ownership is slightly higher in rural wards with average car ownership of 1.6 cars per household compared with an average of 1.21 in urban areas.</p> <p>On the basis of this information it is proposed to amend the standard for 2 bedroom dwellings to allow 2 spaces in rural areas except where a garage is provided which would constitute one of these spaces. It is not considered necessary to amend the standards for other sized dwellings as these would provide sufficient parking provision to meet average car ownership in rural areas.</p>
Philip Page	Yes	No	Need more than one space at new residences or resulting on street parking will obstruct entrances (a problem on Northumberland Road). Existing practice is out of line with the recommendations in the SPD.	The SPD requires 1 space for one bed units, 1.5 spaces for 2 bed units, and 2 spaces for all larger units, which we understand reflects typical car ownership levels. The national policy regime for parking changed in October 2006 with the publication of PPS3 and now allows the Council to take expected levels of car ownership into account. Until this time the Council was unable to require any on-site parking in many instances.
Roger J Schofield	Yes	Yes	In general agreement.	No comment.
Not specified	n/a	n/a	'Stop empire building – reduce taxes'.	No comment.

Respondent (Agent)	Informed about adoption	Supportive in principle	Summary of comments and suggested changes to be made to address them	WDC Response
Not specified	n/a	n/a	Stop free parking for council workers and sell off Council staff car parks	No comment.
Warwickshire County Council Highways	N/a	Yes	The County Council are satisfied that their comments have been incorporated into the document with the exception of the aisle width shown in diagram 1 (Page 13). It is suggested that this is too narrow and instead should be 3.6m. This would be in line with the County Council's current standards based on Design bulletin 32 (DB32).	It is agreed that the width of the parking space shown in diagram 1 should be increased to 3.6m to reflect County Council advice.
Highways Agency	N/a	n/a	<p>Are generally supportive of the identification of 'high accessibility zones'. However it is suggested that a more sustainable option would be to start with a baseline of zero parking provision for all developments within town centres, and allow additional parking where public car parking is insufficient or where there are other detailed justifications.</p> <p>It is not clear whether dedicated free parking in the town centres is proposed. Free parking is a major barrier to sustainable travel and could undermine the Council's own public parking strategies. The SPD would benefit from a section considering how new town centre parking will be operated and managed.</p>	<ul style="list-style-type: none"> • The standards within high accessibility zones are already between 25% to 50% of those elsewhere in the district. Whilst it is acknowledged that lower standards are appropriate in more accessible locations it is important that sufficient parking is provided for matters of highway safety and in order to ensure the continued vitality of the town centres. For this reason it is considered inappropriate to start with a baseline position of zero parking. It is also pointed out that in the case of residential development PPS3 requires that levels of parking reflect predicted levels of car ownership. Notwithstanding this, there is capacity for developments to provide under the maximum standard in certain instances set out in paragraphs 2.2 and 2.3. • The Councils Parking Strategy is currently being prepared by the Leisure Dept and it is anticipated that this will be considered by the Council's Executive in September. It is intended that the SPD and Parking Strategy are consistent in their

Respondent (Agent)	Informed about adoption	Supportive in principle	Summary of comments and suggested changes to be made to address them	WDC Response
				approach.
Kenilworth Society	Yes	Yes	<ul style="list-style-type: none"> • Do not agree that non residential parking should be less generous in town centres as this will encourage employment and shopping to migrate from urban areas. • It is questioned whether the sentence (Page 7) 'The Council will need to be convinced that the garages, are sufficiently large, accessible and safe that they will be utilised' should read 'sure that they will be utilised' for parking vehicles? And if so how could restrictions on the use of garages be enforced? • Different standards of provision are required for tennis / badminton courts and squash courts. • The SPD should set out standards for riding schools. • The car parking space dimensions on page 12 will be inadequate for vehicles which are larger than average. It is questioned whether parking spaces and driveways of this size will be adequate for semi detached and terraced housing and if this will result in residents trespassing on their neighbours gardens. • Raises the issue of disabled parking spaces at residential developments. • The issue of permitted development rights on page 12 is unclear – does this apply to new 	<ul style="list-style-type: none"> • These standards operate in conjunction with other planning policies which direct employment, retail and leisure uses through a sequential approach which directs development in the first instance to town centre locations. • Planning policy cannot require that garages are utilised for vehicle parking, however it is reasonable to expect that garages are designed in order to accommodate cars. For this reason the sentence will be reworded to state '<i>and sure that they can be utilised</i>'. • It is agreed that there is potential for more intensive use of badminton and tennis courts compared with squash courts and that the standard should be split to reflect this. For badminton and tennis the requirement will be 3 spaces per court in high accessibility zones and 1.5 for low accessibility zones. This will be 2 spaces and 1 space per court respectively for squash courts. • It is not considered necessary to provide a specific standard for riding stables as these would be considered on merit in line with the standard for '<i>composite facilities and other sports and leisure facilities</i>'. • These are standard dimensions for parking spaces which reflect best practice by Warwickshire

Respondent (Agent)	Informed about adoption	Supportive in principle	Summary of comments and suggested changes to be made to address them	WDC Response
			development? Can the planning authority remove permitted development rights e.g. hard surfacing where sustainable urban drainage is incorporated into the original planning application?	<p>County Council. On the advice of the County Council it is proposed to amend the aisle width shown on the 45° layout diagram from 3m to 3.6m. Detailed design considerations over parking provision will be assessed on a case by case basis.</p> <ul style="list-style-type: none"> In line with parking standards in other districts in Warwickshire it is not considered appropriate to require disabled parking for residential uses. The need for disabled parking will be considered on case by case basis on individual merit. Under the General Permitted Development Order (GPDO) householders do not need planning permission to pave over their front garden for parking (unless a condition has been attached to the planning permission). Therefore planning has limited influence to control it. For new developments which incorporate SUDs it may be possible to attach a planning condition to prevent this from being tarmaced over at a later stage.
The Warwick Society	Yes	Yes	<ul style="list-style-type: none"> Page 6 (Para 2.3) point (i) should state Residents Parking Zone rather than RPZ. Point (ii) should state RPZ instead of Residents Parking Zone. The last sentence on page 6 should read 'accessible and safe and that they will be utilised' Are opposed to any on street parking being used to meet parking requirements in new developments. The reference to on street capacity in criteria (i) of paragraphs 2.2 and 2.3 should be deleted. 	<ul style="list-style-type: none"> Agreed Planning policy cannot require that garages are utilised for vehicle parking, however it is reasonable to expect that garages are designed in such a way that they could accommodate cars. For this reason the sentence will be reworded to state '<i>and sure that they can be utilised</i>'. The Government document 'Manual for Streets' states that it may be appropriate for some of the

Respondent (Agent)	Informed about adoption	Supportive in principle	Summary of comments and suggested changes to be made to address them	WDC Response
			<ul style="list-style-type: none"> Residents in new developments should not be eligible for residents parking permits – criteria (ii) of paragraph 2.3 should be altered to reflect this. In the case of A1, A2 and A3 uses table 1 does not address whether parking is intended for employees, customers or both. 	<p>parking demand in major new developments to be accommodated on street. However the Council would only allow this where it would not be detrimental to highway safety.</p> <ul style="list-style-type: none"> As discussed in section 2.3 the County and District Councils will monitor capacity in residential parking zones and restrict parking permits where appropriate. The requirement for A Class uses reflects the PPG13 maximum standard set in national policy without a development size threshold. The Council does not believe that this warrants further clarification.
Warwickshire Police (Framptons Planning)	Yes	Yes	<p>Supports the comment in Para 2.1 that for uses where there is no standard or which fall outside the UCO parking provision will be based on the individual circumstances of the development. However it is recommended that a further note is attached to table 1 to state:</p> <p><i>'Provision of destination parking at Warwickshire Police Headquarters, Police Stations and other Police facilities in the District will be based up on the individual circumstances of the development reflecting the fact that these are sui generis uses'.</i></p>	As stated in paragraph 2.1, uses which fall outside the UCO will be considered on individual merit. It would not be appropriate to refer to specific sites.
Kenilworth Town Council	Yes	Unsure at this stage	<ul style="list-style-type: none"> Objects that Kenilworth is treated as an area of equally high accessibility as Leamington and Warwick. It is pointed out that Kenilworth does not 	<ul style="list-style-type: none"> The standards are already reasonably generous compared with those contained in PPG13. It would be too complicated to have separate standards for

Respondent (Agent)	Informed about adoption	Supportive in principle	Summary of comments and suggested changes to be made to address them	WDC Response
			<p>have rail access and only has limited public transport provision particularly in North West and South East Kenilworth parts of which are beyond reasonable walking distance from the centre. It is essential that adequate parking is provided as part of the regeneration of the central area of Kenilworth to ensure people do not go elsewhere.</p> <ul style="list-style-type: none"> • Criteria (iii) of section 2.3 does not make any sense. The absence of on street parking can hardly be a reason for a reduction in the off street provision. • To set the standard for higher and further education on the number of classrooms misunderstands the nature of this type of use which involves lecture theatres, laboratories etc. • For the avoidance of doubt the reference to coaches in the sports land uses should be referred to as 'motor coaches'. • Suggests inclusion of 'boundary' in the sentence 'Parking spaces alongside a wall, fence or <u>boundary</u> should be 3 metres wide' to avoid having to cross another persons land to get out of the car. • The specified width and length of parking spaces is considered to be inadequate to accommodate those with mobility constraints, families, two door cars, or vehicles with low aprons. 	<p>different parts of the urban areas.</p> <ul style="list-style-type: none"> • Criterion (iii) refers to those circumstances where it is not possible to park on street (e.g. because there are yellow lines) so there can't be the problem of greater on-street parking. It is proposed that the criteria is expanded to further explain this as follows 'there is no on-street parking <i>permitted</i> in the vicinity of the development (<i>so there is no potential for on-street parking to detrimentally affect the safety and convenience of other residents and occupiers</i>) • This is one of a number of methods used for calculating parking demand amongst the authorities surveyed. Other approaches base demand on the number of staff or on a case by case basis on the individual merits of the scheme. • It is agreed that for clarity the sports land uses should refer to 'motor coaches'. • It is agreed that the sentence should be amended as requested. • These are standard dimensions used by Warwickshire County Council and the government publication Manual for Streets. These dimensions are only expected to be a minimum.
Solihull Metropolitan Borough Council	Yes	Yes	<ul style="list-style-type: none"> • The use of maximum standards in most circumstances means that the standards are effectively operating as minimum standards. This 	<ul style="list-style-type: none"> • This approach, as set out in DP8, has been tested through the Local Plan Inquiry where it was considered to be in compliance with PPG13.

Respondent (Agent)	Informed about adoption	Supportive in principle	Summary of comments and suggested changes to be made to address them	WDC Response
			<p>approach is inconsistent with PPG13 which advises that there should be no minimum standards for development other than for the disabled.</p> <ul style="list-style-type: none"> • An additional criterion should be added to the list in section 2.2 of the circumstances where car parking below the maximum standard may be deemed appropriate - <i>'There is an appropriate travel plan in place'</i>. • Criteria (i) should consider the effect on the safety and convenience of other road users not just other residents. • To improve clarity the SPD should specify what is meant by 'a worsening of the parking situation' in criterion (vi) • No definition is provided for low accessibility zones. It is unclear whether these are all areas outside the high accessibility zones or whether there is a medium level of accessibility between the two. 	<p>Particular local concerns over safety mean that maximum standards will be appropriate in most instances.</p> <ul style="list-style-type: none"> • Section 9 of the SPD refers to travel plans and how they may be used to justify providing significantly less parking than the maximum standard. An additional sentence has also been added to section 2.2 to state 'where applicants seek to satisfy criteria (iii) or (iv) the council will expect, where appropriate, this to be demonstrated through a travel plan (see section 9)'. • Criteria c) of DP8 ensures that the safety of road users is taken into account when accessing the capacity of on street parking. It is proposed to further expand on this as a key principle of the SPD on pg 4 with the inclusion of the following text: <i>The availability of on street parking may be a reason for not applying the maximum standard. In all cases the council will consider whether the development can be implemented without detriment to highway safety.</i> • This criteria (vi) will be amended to read 'would not <i>unacceptably</i> worsen the parking situation'. • It is agreed that the following sentence should be expanded to clarify the difference between low and high accessibility zones. 'The town centres (as <i>defined</i> on the Local Plan Proposals Maps) are therefore designated as high accessibility zones <i>with all other areas within the district being deemed as low accessibility zones</i>'.
Baginton Parish	Yes	Yes	None	None

Respondent (Agent)	Informed about adoption	Supportive in principle	Summary of comments and suggested changes to be made to address them	WDC Response
Council (Roger Fawcett)				
John Henderson	Yes	Yes	None	None
Framptons	Yes	Yes	None	None

Supporting Policies to the Vehicle Parking Standards SPD

The following extracts are the main local and regional policies to which the Vehicle Parking Standards SPD relates. The full text of these policies can be found at:

Warwick District Local Plan 1996 – 2011

(<http://www.warwickdc.gov.uk/WDC/Environment+and+planning/Planning/Local+Plan.htm>)

Warwickshire Structure Plan 1996 - 2011

[http://www.warwickshire.gov.uk/Web/corporate/pages.nsf/Links/DA6287815250438880256F18004FE073/\\$file/Wasp.pdf](http://www.warwickshire.gov.uk/Web/corporate/pages.nsf/Links/DA6287815250438880256F18004FE073/$file/Wasp.pdf)

Regional Spatial Strategy (formerly RPG11)

<http://www.wmra.gov.uk/page.asp?id=49>

Further detail of other relevant policies is provided in **Appendix B** of the Sustainability Appraisal.

Warwick District Local Plan 1996 – 2011

DP8 Parking

Development will only be permitted that makes provision for parking which:-

- a) does not encourage unnecessary car use;
- b) has regard to the location and accessibility of the site by means other than the private car;
- c) does not result in on-street car parking detrimental to highway safety;
- d) takes account of the parking needs of disabled car users, motorcyclists and cyclists; and
- e) takes account of the requirements of commercial vehicles.

Warwickshire Structure Plan 1996 – 2011

Policy T.5 Influencing Transport Choice

Choice of transport will be influenced through the following measures:

Green Transport Plans

Green transport plans will be encouraged and promoted for all major traffic generators including, educational establishments, district councils, major employers, hospitals, large retail developments and leisure facilities.

New developments generating significant travel demands will be required to demonstrate how the impact on the road network will be minimised. Formal agreements

to implement business transport plans and commuter travel plans will be sought where appropriate.

Parking Standards

Consistent with the objectives in T.1 and the targets set out in T.2 and within the context of meeting the overall access demands of development and the targets, local plans will set maximum parking standards for different types of development in different locations.

Using the maximum standards set out in Appendix A as a starting point, local parking standards will:

- (a) support the general locational policies of the Plan, particularly those focusing development on town centres;
- (b) account for the different circumstances in rural and urban areas;
- (c) take into account the accessibility of the location by other modes of transport;
- (d) encourage non-car based modes of transport; and
- (e) not be used to compete with other authorities for development.

Local plans should also set minimum standards for the provision of cycle parking.

Town Centre Parking

In town centres new off-street parking will only be acceptable in association with major new developments, such as retailing and leisure facilities, where:

- (a) it is consistent with the targets and parking standards in this Plan; and
- (b) there is a demonstrable shortage of parking in that town centre; and
- (c) the parking will serve the centre as a whole.

In town centres the proportion of long stay parking should be reduced or replaced with short stay parking.

Regional Spatial Strategy (Formerly RPG11)

POLICY T7: Car Parking Standards and Management

Maximum Standards

- A. Local authorities should work within maximum standards for parking associated with new development in line with those given in PPG13 and reflecting the approach set out in PPG3. All local authorities should work together to identify, before the next review of RPG:
 - i) those town centres and heritage areas to which more restrictive standards should be applied, because of their public transport accessibility, higher densities and/or sensitive character; and
 - ii) a broad indication of more restrictive maximum standards for relevant land use categories.

- B. These areas and standards should then be incorporated into development plans. Care should be taken to avoid deterring investment in town centres, particularly those judged to be vulnerable (PA11).

Management of Car Parking

- C. Local authorities, working together, should manage their car parking to reduce congestion and encourage more sustainable forms of travel by:
- i) managing the supply, location, and price of parking in town and city centres to limit the provision of long stay spaces, where this is necessary to reduce congestion;
 - ii) co-operating with each other to avoid using car parking charges as a tool for competition between centres;
 - iii) using additional income to support the development of more sustainable forms of travel;
 - iv) securing an adequate supply of car parking at railway stations and other transport interchanges;
 - v) securing local Park & Ride sites as an alternative to town centre parking; and
 - vi) developing a network of strategic Park & Ride sites, generally at railway stations, to meet the needs of the Region (T6).
- D. Local authorities should work with private sector operators to encourage a consistent approach within centres. Where car parking is provided it should be safe and secure with appropriate provision for people with disabilities. Local authorities should also consider the adoption of decriminalised parking enforcement powers in order to secure more effective management of car parking and demand management measures.

Sustainability Appraisal for Vehicle Parking Standards SPD: Non Technical Summary

This Sustainability Appraisal (SA) Report builds on the work in the Scoping Report¹ produced in November 2006.

That earlier report set out a framework with which all documents that form part of the Warwick District Council Local Development Framework (LDF) would be appraised for their environmental, economic and social implications. This document applies that framework to the Vehicle Parking Standards Supplementary Planning Document (SPD).

In addition to setting out the appraisal framework, the Scoping Report also presented the following information:

- A summary of relevant plans, policies and programmes (specifically for each SPD covered by the Scoping Report);
- A set of indicators, baseline data and targets or comparators (relevant to the whole of the LDF); and
- A summary of sustainability issues (again, specifically for each SPD).

In this SA Report, following an introduction in Section 1, the summary of relevant plans, policies and programmes is introduced in Section 2, with the information presented in full in Appendix B. The indicators, data and targets/comparators are discussed in Section 3 of this report, but as they were presented in Appendix 2 of the 2006 Annual Monitoring Report, in addition to the Scoping Report, they are not repeated here. The sustainability issues are presented in full in Section 4 of this SA Report.

In brief, the sustainability issues relate to:

- Managing the demand for car travel and promoting alternative means of travel;
- Climate change;
- Air quality;
- Safety and access to existing properties;
- Convenient access to facilities, services and employment and maintaining a strong and stable economy;
- Social equity and the efficient use of land;
- Measures to avoid flooding; and
- Monitoring the SPD.

Section 5 presents the Sustainability Appraisal Framework. This is an appraisal tool which sets out 17 sustainability objectives. Against each of these it poses 'key questions' to help the assessor determine how this objective can be realised, and a set of indicators by which progress towards the objective can be monitored.

Section 6 sets out the Vehicle Parking Standards SPD's objectives and tests these against the SA objectives. This section of the SA process is useful in determining any

¹ Supplementary Planning Documents on Parking, Affordable Housing and Open Space: Sustainability Appraisal and Strategic Environmental Assessment, Scoping Report, November 2006

tensions between the objectives of the SPD and the wider LDF. In practice, however, these are tensions that are inherent to the whole of the LDF and where the role of the planners, and of the Council as a whole, comes into play in balancing the competing claims of environmental, economic and social policies.

The main potential incompatibilities between objectives are as follows:

- Restricting non-residential car parking to encourage the use of sustainable transport and help ensure the efficient use of land won't necessarily be strongest for the economy which might favour unfettered demand for car use (though equally the cost of road congestion could become very significant to some businesses if traffic were allowed to grow unchecked). Similarly, restricting car parking in the town centres won't necessarily support their continued vitality if the restrictions are too severe;
- Measures to ensure the efficient use of land won't protect townscapes or the historic and cultural environment if these are encouraged to become too dense (though it would tend to preserve landscapes on the edge of town). Similarly, restricting car parking in the town centres could have an adverse impact on townscapes in surrounding residential areas if they have to accommodate overflow parking;
- Any measures to restrict car parking could conflict with improving accessibility to local services and community facilities. Such measures will, however, tend to serve the interests of those without the use of a car or who would rather use more sustainable means of transport.

In Section 7 a number of options are developed to test the environmental, economic and social implications of different approaches to car parking. There are 3 residential and 3 non-residential options. These are:

Non-residential (NR) development:

- NR Option 1: Impose national maximum parking standards across all areas of the district

This option would adopt the national standards as set out in PPG13.

- NR Option 2: Impose more restrictive standards than PPG13 across all areas of the district

This option would comply with national guidance on maximum standards in PPG13 but would be stricter.

- NR Option 3: Impose PPG13 standards outside High Accessibility Zones (HAZs) and more restrictive standards within HAZs

This option distinguishes between the town centres (the 'High Accessibility Zones') and all other areas of the district. With the town centres standards would be more restrictive than PPG13 and outside the town centres the national maximum standards would apply.

Residential Development

- Residential Option 1: Single average parking standard for all sizes of units

This approach establishes a single standard to apply as an average across all sizes of development. (For example, it could set a standard of one space per dwelling unit, regardless of whether it had one, two or three bedrooms).

- Residential Option 2: Variation in standards by size of unit

This approach recognises the different levels of car ownership typically associated with different size of properties. (For example, it could be that one bedroom dwellings have one space, two bedrooms have 1.5 spaces etc.)

- Residential Option 3: Spatial variation in residential parking standards

This approach allows for higher residential parking in rural parts of the district to reflect greater car dependency in these areas. (It needs to be combined with either the Option 1 or Option 2 approaches – i.e. it is not a mutually exclusive option).

The option appraisal is presented in a series of tables in Appendix D and is discussed in Section 7.3. In assessing how significant any negative implications are, the appraisal considers whether measures can be taken to prevent or reduce them. These are termed 'mitigation measures'. This section of the document also records some ways in which the SA process has helped shape the SPD.

Section 8.1 summarises the option appraisal and any measures that would need to be taken to mitigate negative effects and maximise any positive effects. It is important to note that the benefits and costs of the various approaches are proportionate to the amount of new development (including redevelopments and changes of use) and would not lead to a 'step change' in parking generally.

In brief, the findings are as follows:

Non-Residential Options

NR Option 1: Impose national maximum parking standards across all areas

NR Option 1 would place a heavy burden on the environment. There is little that can be done to alter the fact that this option encourages car use, resulting in congestion and pressures for further road building. Also developments will generally take up more land if they are to have lots of parking. However, some of the environmental impacts can be mitigated outside of the planning regime through the introduction of low or non-carbon fuels to reduce the environmental impacts of traffic. Similarly steps could be taken to protect the most sensitive sites from new development.

The positive aspects of this option – essentially the freedom it gives to businesses, commuters, shoppers and others to drive and park their cars – at least until congestion builds up, follows from the generous parking regime.

This option also performs relatively poorly against the SA's social objectives because it favours car drivers over those without access to a car and it does not encourage walking and cycling which have health benefits.

Overall the adverse environmental and social impacts of this option are assessed as significant.

NR Option 2: Impose more restrictive standards than PPG13 across all areas

NR Option 2 has a lower environmental impact but risks under-providing parking in areas where accessibility by means of transport other than the car (i.e. walking, cycling and public transport) is poor. It also risks making parking difficult for those for whom driving and parking is the only real option. Mitigation involves strengthening public transport provision, improving facilities and safety for cyclists and promoting walking and cycling. There remains a risk that insufficient investment would be available and attitudes would only change marginally, with spending and investment leaning to those centres better served by car.

NR Option 2 performs well under the social criteria of the Sustainability Appraisal due to the implications for health and those without access to a car.

Notwithstanding the potential for mitigation, the adverse economic impacts of this option are considered to be significant.

NR Option 3: Impose PPG13 standards outside High Accessibility Zones (HAZs) and more restrictive standards within HAZs

NR Option 3 encourages relatively high density in the town centres but lower density development associated with more parking in less accessible locations. It is average performing under the environmental criteria.

It is probably the strongest performing option in terms of the impact on the local economy as businesses have a choice of location and parking regime within the district. This option does, however, carry the risk that it could encourage investment outside of the town centres when a more concentrated pattern of development would be more sustainable. Mitigation would be needed to ensure that the town centres were adequately served by public transport and to encourage walking and cycling into the centres.

This option also performs well under the social criteria of the Sustainability Appraisal (similar to NR Option 2) due to the implications for health and social inclusion.

Overall there are no significant effects associated with this option.

Potential negative impacts of all of the non-residential options will be eased to a degree by the SPARK initiative, led by Warwickshire County Council, which is intended to deliver a 'step change' in public transport by 2010.

Residential Options

With all three residential options, the provision of parking standards will generally increase off-street parking which is likely to be beneficial for neighbouring properties and could have positive implications for road safety. However, also with all options, there is a potential loss in urban quality and habitats with gardens being converted to car parking if dwellings are sub-divided.

Residential Option 1: Single average standard for all sizes of units

In setting a single car parking standard that is an average for all sizes of unit, residential option 1 risks under-providing parking for large units and over-providing parking for small units. (However, as an applicant would have the freedom to distribute the parking across units of different sizes, where these are proposed in a single application, this risk applies only to developments that are exclusively small or exclusively large units).

This risk is reflected in the Sustainability Appraisal as a potentially inefficient use of land, with small units, and increased demand for on-street parking, with large units. Insufficient off-street parking is associated with a potential risk to road safety and urban quality. The inefficient use of land, on the other hand, puts the landscapes that provide the setting to towns and villages at greater risk. However, as the standards apply only to new developments (and only to those that are exclusively large or exclusively small developments), these risks are fairly marginal.

Overall there are some relatively minor adverse impacts associated with this option but (in common with all residential options) there are significant benefits associated with having fewer vehicles associated with new developments parked on the highway.

Residential Option 2: Variation in parking standards by size of unit

This option has less potential to generate inefficient use of land associated with small units and a lower potential demand for on-street parking in locations with larger units. Consequently there should be less risk to road safety and the quality of the urban environment. Less inefficient use of land also means less risk to the landscapes that provide the setting to towns and villages, though this impact is only marginal.

Any reduction in on-street parking associated with this option would also have a positive social effect with easier parking for those continuing to need on-street parking and less inconvenient parking.

Overall, there are no significant adverse impacts associated with this option and (in common with all residential options) there are significant benefits associated with having fewer vehicles associated with new developments parked on the highway.

Residential Option 3: Spatial variation in residential parking standards

This option allows for greater residential off-street parking in the rural areas to reflect residents' higher car dependency. This is therefore a potential benefit for rural residents. Within the urban areas residential car parking would be the same as under Residential Options 1 or 2 (i.e. it is not restricted because of the greater provision in rural areas).

There is, however, the potential adverse environmental effect of an over-provision of off-street spaces in the rural areas, especially as competing demands for on-street parking associated with non-residential facilities tends to be lower in these areas. If any such over-provision were to occur, it would be associated with inefficient use of land and a higher land take of rural developments which could (albeit in a relatively small way) place greater threats on rural landscapes and sensitive environments. It could be partially mitigated by using planning to protect the most sensitive sites and areas. This option could also have the negative social effect of discouraging the development of better bus networks in rural areas over the medium to long term.

Overall the adverse effects associated with this option are unlikely to be significant and (in common with all residential options) there are significant benefits associated with having fewer vehicles associated with new developments parked on the highway.

Potential negative impacts of the residential options are more difficult to address with mitigation measures. Changes to the parking management regime with the introduction of Decriminalised Parking Enforcement are intended to ease pressures on on-street parking generally and should help manage parking pressures where off-street provision is insufficient to cater for all the parking generated by new residential developments.

Where too much parking is provided at new residential developments, leading to an inefficient use of land, the main mitigation is simply to protect the most sensitive sites and locations from new development.

Section 8.2 on monitoring, lists those indicators from the Sustainability Appraisal Framework that are most relevant to the Vehicle Parking Standards SPD. These indicators monitor the effects of a range of Warwick District Council and Warwickshire County Council policies as well as external factors.

If performance against any of these indicators deteriorates when the Vehicle Parking Standards SPD is implemented, then further investigative work will be required to determine whether the SPD itself is contributing to the worsening situation. If it is then the Council would need to take remedial action through a review of the SPD.

Section 9 summarises the public consultation exercise on the draft SPD and SA. In response to the representations received a number of changes were made to improve the useability and clarity of the SPD. Further amendments were made to reflect internal consultation, updated guidance and to address any typographical errors. In the Council's opinion these are all minor amendments which do not require appraisal through the SA process.

A change was also made to the standard for two bedroom dwellings to allow a higher level of provision in rural areas to meet average levels of car ownership. The implications of spatial variation have been appraised as residential option 3. Overall it was found that the adverse effects associated with this option are unlikely to be significant. There is the potential for an over-provision of off-street spaces in the rural areas, however, because the difference will only apply to two bedroom dwellings it is unlikely to have a significant impact.