

Parking Standards Design and Good Practice  
30<sup>th</sup> June 2009  
Public Consultation  
Regulation 18



Consultation replies have been considered by a Parking Standards Consultation Assessment board, consisting of members of the Strategic Development group within Essex County Council who are members of the Parking Standards Working Group. The review took place over 5 sessions throughout June 2009.

The consultation responses are summarised in the table below under the categories: General Comment, Technical, Environmental Considerations, SUDS, Monitoring Framework, Enforcement, Cycling, Powered Two Wheelers, Disabled, Blue Badge, Planning Obligations, Transport Assessments, Travel Plans, Parking Bays, Safer Parking Scheme, Residential, Pavement Parking, Section 4, Commercial, Education, Motor Homes, Large Scale Development, Rural, Existing Situation.

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**Direct Reference:** General Comment

<b>Contact Name:</b> Natalie Blaken	<b>Organisation:</b> EEDA	<b>Reference:</b> 004
<b>Summary of comments</b> Supporting	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None

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**Direct Reference:** General Comment

<b>Contact Name:</b> Carol Tomsett	<b>Organisation:</b> Navestock Parish Council	<b>Reference:</b> 005
<b>Summary of comments</b> Supporting	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None

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**Direct Reference:** General Comment

<b>Contact Name:</b> Nicholas Chivers	<b>Organisation:</b>	<b>Reference:</b> 008
<b>Summary of comments</b> Congratulating the logic of the proposed residential changes.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None

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<b>Direct Reference:</b> General Comment		
<b>Contact Name:</b> Anthony Jackson	<b>Organisation:</b>	<b>Reference:</b> 010
<b>Summary of comments</b> Welcomes the proposals to set minimum standards for spaces and garages. Need methods to prevent cars blocking access over dropped kerbs. Parking controls force motorist to move to another location. Where do maximum standards come from? Destinations should be considered on their own merit and maximum exceeded where a case is made.	<b>Response to comments</b> Changes to setbacks should prevent vehicles parking across dropped kerbs. Maximum standards are part of National Guidance in an effort to reduce the reliance on cars. No evidence was provided by the working group/District Councils that maximum standards were not working at “destinations” (e.g. workplace, leisure, retail).	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> General Comment		
<b>Contact Name:</b> Anthony Shilson	<b>Organisation:</b>	<b>Reference:</b> 011
<b>Summary of comments</b> Supports proposed standards, new estates are blighted by parked vehicles in every conceivable location bar a garage or drive as they do not fit. People can not be forced out of their car by such methods. Car and motorbikes will always be necessary for people, public transport is not good enough for people needs/takes too long. 100% agree with proposals.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> General Comment		
<b>Contact Name:</b> Ken Pelling	<b>Organisation:</b>	<b>Reference:</b> 012
<b>Summary of comments</b> Watched the article on BBC news regarding the parking standards with interest. Oakwood Park is a classic case and requests the ECC look into measures to prevent parking in Oakwood Park.	<b>Response to comments</b> Acknowledge Oakwood Park is an issue. There is a fine balance between installing parking restrictions and keeping residents happy by not taking their perceived parking away from them.	<b>Summary of proposed action</b> Prepare an individual response to letter.
<b>Direct Reference:</b> General Comment		
<b>Contact Name:</b> Tony Hall	<b>Organisation:</b> Councillor for Church Langley	<b>Reference:</b> 014
<b>Summary of comments</b> Objected to previous maximum residential standards, individuals/families need to own a car.	<b>Response to comments</b> Noted. The proposed residential (origin) standards are minimum, so developers can	<b>Summary of proposed action</b> None

The number of spaces should relate to the number of bedrooms up to 5 beds rather than 2 beds. Conversions are a powerful issue. It is human nature to park outside their front door. The new proposals are welcome but do not go far enough.

provide more than specified if desired.

**Direct Reference:** General Comment

**Contact Name:** Jennifer Weeder

**Organisation:** Witham Town Council

**Reference:** 015

**Summary of comments**

**Response to comments**

**Summary of proposed action**

Supporting

Noted

None

**Direct Reference:** General Comment

**Contact Name:** C McSweeney

**Organisation:** Tiptree Parish Council

**Reference:** 018

**Summary of comments**

**Response to comments**

**Summary of proposed action**

Supporting

Noted

None

**Direct Reference:** General Comment

**Contact Name:** T Melhuish

**Organisation:** South Woodham Ferrers Town Council

**Reference:** 019

**Summary of comments**

**Response to comments**

**Summary of proposed action**

Supporting

Noted

None

**Direct Reference:** General Comment

**Contact Name:** David Linnell

**Organisation:** Loughton Residents Association

**Reference:** 022

**Summary of comments**

**Response to comments**

**Summary of proposed action**

Supporting

Noted

None

**Direct Reference:** General Comment

**Contact Name:** Helen Philpot

**Organisation:** Billericay Town Council

**Reference:** 023

**Summary of comments**

**Response to comments**

**Summary of proposed action**

Supporting

Noted

None

**Direct Reference:** General Comment

**Contact Name:** Matthew Last

**Organisation:** Ardent Consulting

**Reference:** 028

**Summary of comments**

**Response to comments**

**Summary of proposed action**

P.13 2.5.1 Supports P.14 2.6.2 Supports P.28 3.4.5 Supports. Reference should be made to the English Partnerships document <i>Car Parking: What works where</i>	The English Partnerships document is not specific to Essex.	None
<b>Direct Reference: General Comment</b>		
<b>Contact Name:</b> Peter Le Grys	<b>Organisation:</b> Maldon District Council	<b>Reference:</b> 032
<b>Summary of comments</b> The report is recognised as being a positive and realistic way forward, attempting to reconcile the difficulties in ensuring adequate parking facilities while encouraging and improving design within the build environment. One issue where perhaps further consideration is necessary relates to the extent of parking provision for destinations within districts such as Maldon where alternative modes of transport will still remain poor. Nethertheless, the document is an appropriate move forward and may be developed further in conjunction with this Council's preparation of its Local Development Framework.	<b>Response to comments</b> Noted, the document has been produced for Countywide use so can not focus on the features of individual Districts.	<b>Summary of proposed action</b> None
<b>Direct Reference: General Comment</b>		
<b>Contact Name:</b> Jennifer Pettitt	<b>Organisation:</b> Alresford Parish Council	<b>Reference:</b> 034
<b>Summary of comments</b> The document has been considered by members of the Highways Working Party of Alresford Parish Council, who have no further comments to make.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None
<b>Direct Reference: General Comment</b>		
<b>Contact Name:</b> David Bird	<b>Organisation:</b> Savell Bird and Axon	<b>Reference:</b> 035
<b>Summary of comments</b> We welcome this review and are encouraged that ways of making land use and car parking requirements more efficient are being taken up.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None

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**Direct Reference:** General Comment

**Contact Name:** Vivienne Messenger

**Organisation:** Loughton Town Council

**Reference:** 040

**Summary of comments**

**Response to comments**

**Summary of proposed action**

The committee welcomed a more realistic approach to parking issues i.e. car ownership and usage can not be controlled by parking restrictions, and supported steps to provide adequate parking for housing, commercial developments and transport hubs with a flexible approach to meet local circumstances. The Committee felt the suggestion that car parking provision be linked to the size of the property (number of bedrooms) was reasonable.

Noted

None

The committee would like children to be encouraged to walk/cycle to school provided safety concerns were addressed. In general it would like walking and cycling to be promoted by the provision of safe footpaths and cycling routes. The committee would like to discourage the harm and destruction done to grass verges by parked vehicles by the installation of suitable barriers and/or legal means, but recognise that it might, in some circumstances, be practical to remove verges in order to provide parking spaces.

It agreed that modern car design required that minimum dimensions of parking bays and garages needed to be increased.

The committee broadly supported the environmental considerations on P.11 but has some concerns regarding undercroft parking and potential health issues arising from fumes.

It agreed with the change of use considerations

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on P.14.

The committee supported the proposal for bigger setbacks.

The committee had some difficulty assessing the document because there was no overview, nor comparisons of previous and proposed parking standards.

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**Direct Reference:** General Comment

**Contact Name:** David Porth

**Organisation:** Sturmer Parish Council

**Reference:** 041

**Summary of comments**

A timely well prepared and presented document which was welcomed by our Parish Council

**Response to comments**

Noted

**Summary of proposed action**

None

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**Direct Reference:** General Comment

**Contact Name:** Dr Allan Burns

**Organisation:** On behalf of self and McCarthy and Stone (Development) Ltd

**Reference:** 042

**Summary of comments**

1.2.1 The review of standards is prudent  
2.2.1-2.2.6 Supports

**Response to comments**

Noted

**Summary of proposed action**

None

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**Direct Reference:** General Comment

**Contact Name:** Lorraine Green

**Organisation:** Stock Parish Council

**Reference:** 048

**Summary of comments**

The Parish Council agree with the residential guidelines and recommendations. Good public transport would solve the problem.

**Response to comments**

Noted

**Summary of proposed action**

None

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**Direct Reference:** General Comment

**Contact Name:** Malcolm Inkster

**Organisation:** Tendring District Council

**Reference:** 049

**Summary of comments**

The revised parking design and standards document reflect emerging government guidance, and will provide this Council with

**Response to comments**

Noted

**Summary of proposed action**

None

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sound advice and good practice guidance on the design of parking provision. The key change to standards relates to residential provision – proposing to require this as a minimum rather than (as previously) a maximum. This is welcomed and should help development control decisions in terms of reducing the likelihood of on-street parking.

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**Direct Reference:** General Comment

**Contact Name:** Margaret Gellatly

**Organisation:**

**Reference:** 052

**Summary of comments**

Existing parking arrangements do not allow for adaptation. Much of the writing within the document is incomprehensible. Makes comments regarding existing situation at a local supermarket, health centre and offices which lack the standards set out in the guide, e.g. disabled provision and location and powered two wheeler provision).

**Response to comments**

The guidance is for new developments, not existing.

**Summary of proposed action**

None

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**Direct Reference:** General Comment

**Contact Name:** Deborah Milnes

**Organisation:** Frinton and Walton Town Council

**Reference:** 053

**Summary of comments**

The Town Council welcome the suggested minimum parking standards as proposed in this draft consultation document.

**Response to comments**

Noted

**Summary of proposed action**

None

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**Direct Reference:** General Comment

**Contact Name:** Susan Deluca

**Organisation:** North Weald Bassett/Birdbrook Parish Council

**Reference:** 057

**Summary of comments**

The Parish has concerns that the rules for homes are relaxed but rules for destinations tightened. Factories limited to 1 space per 50sqm and golf courses 3 per hole are just two of

**Response to comments**

The standards for destinations are not being changed in the majority of cases.

**Summary of proposed action**

None

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many. Planners still harbour the notion that inconveniencing motorists will reduce the use of the car when in fact there is no alternative for many.

Need to support the provision of adequate parking via S106 agreements.

Noted

None

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**Direct Reference:** General Comment

**Contact Name:** Helen De La Rue

**Organisation:** East of England Regional Assembly

**Reference:** 059

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**Summary of comments**

The committee agreed that the consultation document does not raise any issues of general conformity against policies of the East of England Plan.

**Response to comments**

Noted

**Summary of proposed action**

None

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**Direct Reference:** General Comment

**Contact Name:** R Harvey

**Organisation:** Fingringhoe Parish Council

**Reference:** 060

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**Summary of comments**

The Parish Council support the increase of parking provision for new developments.

**Response to comments**

Noted

**Summary of proposed action**

None

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**Direct Reference:** General Comment

**Contact Name:** John Blake

**Organisation:** Broomfield Parish Council

**Reference:** 062

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**Summary of comments**

The Parish Council would like to support the general thrust of the draft Parking Standards Consultation Document. We agree that the Government's attempts to limit car use by making it difficult to park have not succeeded in reducing car ownership and have resulted in new neighborhoods that are less safe, more disorganised through random parking and therefore more dominated by the car. It has also failed to tackle the real problem, which is car use rather than car ownership. The key strategy

**Response to comments**

Noted

**Summary of proposed action**

None

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should be providing high quality and affordable alternatives to the car. The goal should be to promote these so that people are happy to leave their cars at home (it is less important whether people own cars or not, as long as there is a realistic alternative to using them).

While increasing the standards for car parking (e.g. larger garages and parking lots to accommodate modern family cars), the Parish Council is keen that this should not lead to significantly larger or more sprawling development. As an area that has been identified to accommodate 800 new dwellings in Chelmsford Borough Council's North Chelmsford Area Action Plan, we are keen that new development should continue to be as compact as possible. We therefore support a good range of parking options, including well-designed and safe common parking areas rather than a general return to large front drives, which can be an inefficient use of space. We also support the provision of safe and accessible parking space for bikes to encourage this mode of transport.

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**Direct Reference:** General Comment

**Contact Name:** Kate Fox

**Organisation:** Great Bardfield and Finchingfield Parish Council

**Reference:** 064

**Summary of comments**

Both Councils welcome the document and agreed it to be comprehensive, very readable etc.

**Response to comments**

Noted

**Summary of proposed action**

None

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**Direct Reference:** General Comment

**Contact Name:** Cllr Dr R D Feltham

**Organisation:** Silver End Parish Council

**Reference:** 065

**Summary of comments**

P.35, 36, 41, 42 3.4.13, 3.4.14, 3.4.23 – Very

**Response to comments**

Noted

**Summary of proposed action**

None

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important to avoid the continuous illegal parking overhanging pavements.

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**Direct Reference:** General Comment

**Contact Name:** Steve Rogers

**Organisation:** Castle Point Borough Council

**Reference:** 066

**Summary of comments**

**Response to comments**

**Summary of proposed action**

The review of car parking standards across the county is welcome since it has been apparent for some time that the present standards do not adequately cater for the car particularly in residential developments.

Noted

None

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**Direct Reference:** General Comment

**Contact Name:** Paul Munson

**Organisation:** Braintree District Council

**Reference:** 067

**Summary of comments**

**Response to comments**

**Summary of proposed action**

The District Council supports the general approach of the revised standards.

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**Direct Reference:** General Comment

**Contact Name:** Clive Potter

**Organisation:** Great Totham Parish Council

**Reference:** 068

**Summary of comments**

**Response to comments**

**Summary of proposed action**

We support the proposals.

Noted

None

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**Direct Reference:** General Comment

**Contact Name:** Philip Niesing

**Organisation:** Harlow District Council

**Reference:** 069

**Summary of comments**

**Response to comments**

**Summary of proposed action**

Generally the Council has no problems with the revised document, however given that the August 2001 Parking Standards Document forms part of Harlow's Replacement Adopted Local Plan, legal advice is being obtained as to whether the revised Parking Standards can be implemented.

Noted

None

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**Direct Reference:** General Comment

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<b>Contact Name:</b> G Bassett	<b>Organisation:</b> Shotgate Parish Council	<b>Reference:</b> 074
<b>Summary of comments</b> Please accept the late response to this consultation. At this moment in time, Shotgate Parish Council does not have anything more to add.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> General Comment		
<b>Contact Name:</b> Mrs M Cheatle	<b>Organisation:</b> Althorne Parish Council	<b>Reference:</b> 075
<b>Summary of comments</b> Althorne Parish Council congratulate the Essex County Council on the production of a well designed and delivered consultation which has the support of the Althorne Parish Council	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Technical		
<b>Contact Name:</b> Amanda Ward	<b>Organisation:</b> Stanway Parish Council	<b>Reference:</b> 021
<b>Summary of comments</b> Document should be presented in concise, easy readable format with less repetition	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Technical		
<b>Contact Name:</b> Laura Chase	<b>Organisation:</b> Colchester Borough Council	<b>Reference:</b> 024
<b>Summary of comments</b> P.61 Reword last para to emphasis only reduction to vehicle parking std, not cycle/P2W	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> Amend P.61.
<b>Direct Reference:</b> Technical		
<b>Contact Name:</b> Laura Chase	<b>Organisation:</b> Colchester Borough Council	<b>Reference:</b> 024
<b>Summary of comments</b> Photos need reviewing. P.24 poor design, lacking trees/visual mitigation. Photos need better captions to establish links to text, not always clear if they show good or bad design.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> Review photos, add captions.
<b>Direct Reference:</b> Technical		
<b>Contact Name:</b> James Turley	<b>Organisation:</b> Scott Wilson on behalf of Galliard	<b>Reference:</b> 031

	Homes	
<p><b>Summary of comments</b></p> <p>PPS 12 makes it clear that Supplementary Planning Documents (SPD) should not be used to make new policy, PPS12 p.26 Para 6.4. Supplementary Planning Documents should be used to support and elaborate upon development plan documents and not create new policy. Furthermore only development plan making authorities are able to adopt SPD's in support of those development plans and should not produce other planning guidance. Should this document be adopted by the County Council it would not and could not therefore become a Supplementary Planning Document.</p> <p>As this document would not have been through the SPD adoption process it will benefit from neither the rigour of the SPD adoption process or its statutory status. The document should therefore be attributed little weight in the consideration of planning applications. Furthermore, as the content of the proposals are contrary to National planning policy local planning authorities will be mindful that any weight attributed to the document in the determination of a planning application may be disregarded by an Inspector should an appeal be made against any refusal to grant planning permission.</p> <p>Furthermore LPA's should not adopt this document as SPD due to its lack of conformity to or support for national planning policy.</p>	<p><b>Response to comments</b></p> <p>PPS12 P.26 Para 6.3 states that "Supplementary guidance to assist the delivery of development may be prepared by a government agency, Regional Planning Body or a County Council or other body (e.g. AONB committee) where this would provide economies in production and the avoidance of duplication e.g. where the information within it would apply to areas greater than single districts. Such guidance would not be a supplementary planning document. However, if the same disciplines of consultation and sustainability appraisal (where necessary) are applied, such information might, subject to the circumstances of a particular case, be afforded a weight commensurate with that of SPD's in decision making. This may be more likely if the district/borough/city councils to which it is intended to apply endorse the guidance..."</p> <p>It is the intention that District Councils will endorse the guidance, therefore giving the document weight commensurate to a SPD.</p>	<p><b>Summary of proposed action</b></p> <p>None</p>
<p><b>Direct Reference:</b> Technical</p> <p><b>Contact Name:</b> James Turley</p>	<p><b>Organisation:</b> Scott Wilson on behalf of Galliard Homes</p>	<p><b>Reference:</b> 031</p>

<b>Summary of comments</b> Draft Parking Standards - disputes what is stated in Introduction and Policy context. The document is contrary to the fundamental principal of national planning policy. Little weight would be attributed by Secretary of State, LPA's should not adopt document. Will have negative impact on delivering high quality, sustainable, built environment. Copy of consultation response has been forwarded to Go East and LPA's.	<b>Response to comments</b> Following extensive research into the current situation on the ground in Essex by the working group, it was decided that the revised standards would need to depart from current national policy if the parking situation in residential developments were to improve. The evidence demonstrated in the document proves that current national policy is not effective in residential development in Essex.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Technical		
<b>Contact Name:</b> Steve Charman	<b>Organisation:</b> Brentwood Borough Council	<b>Reference:</b> 036
<b>Summary of comments</b> P.57 Residential Education Establishment, further/higher education, error in text, does not state spaces per how many students?	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> Amend
<b>Direct Reference:</b> Technical		
<b>Contact Name:</b> John Pollard	<b>Organisation:</b> Chelmsford Borough Council	<b>Reference:</b> 037
<b>Summary of comments</b> Para 1.2 The document will be contrary to Government advice/planning policy which is a test of soundness in LDF, DfT and Go East response will be significant to the SPD adoption process, should they not accept changes, CBC could not adopt the document through the LDF	<b>Response to comments</b> Noted, no response was received from Go East or DfT	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Technical		
<b>Contact Name:</b> John Pollard	<b>Organisation:</b> Chelmsford Borough Council	<b>Reference:</b> 037
<b>Summary of comments</b> 1.2 Chelmsford Borough Council has an adopted a Supplementary Planning Document 'Making Places' which includes design guidance about 'accommodating the car' at pages 72 to 75. These guidelines are generally in-line with the guidance provided in the Design and Layout	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None

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section of the document. In its present form the Council would not adopt the guidance.

Car parking has to function as a shared surface, and should be designed as such, avoiding excessive treatment which could cause more confusion to the majority of users. Pedestrian use of the space should be the starting point.

Noted

None

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**Direct Reference:** Technical

**Contact Name:** John Pollard

**Organisation:** Chelmsford Borough Council

**Reference:** 037

**Summary of comments**

All photographs in the document need notations to clearly show what the purpose of the image is trying to portray. Photographs on page 8 and page 10 of the consultation document include notations and this principle should continue throughout.

**Response to comments**

Noted

**Summary of proposed action**

Provide caption with each photo

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**Direct Reference:** Technical

**Contact Name:** Ian Bradley

**Organisation:** Great Waltham Parish Council

**Reference:** 039

**Summary of comments**

The doc is reacting to the past, not considering future trends (e.g. electric cars). Proposals are too much stick and not enough carrot (i.e. restrict parking at destination so you have to catch bus or use bike) Reliant on public transport, yet PT is subject to economic conditions and supply and demand at any given time. No link to PT policy referred to.

**Response to comments**

Noted

**Summary of proposed action**

None

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**Direct Reference:** Technical

**Contact Name:** Dr Allan Burns

**Organisation:** On behalf of self and McCarthy and Stone (Development) Ltd

**Reference:** 042

**Summary of comments**

2.4.2 The guidance accepts that non-residential developments are governed by maximum

**Response to comments**

This was the working groups preferred method, consequently it is a requirement of the Parking

**Summary of proposed action**

None

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standards. The example given here should state that the maximum standard is rounded up to 5. This is NOT a requirement, as indicated.

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**Direct Reference:** Technical

**Contact Name:** Dr Allan Burns

**Organisation:** On behalf of self and McCarthy and Stone (Development) Ltd

**Reference:** 042

**Summary of comments**

2.5.1 Purpose of paragraph is unclear, is it for non-residential (if so developers should be advised as to where this might occur, PPG13 allows authorities to require a reduced provision) or residential. Needs clarification.

**Response to comments**

Noted

**Summary of proposed action**

Clarify wording to 2.5.1

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**Direct Reference:** Technical

**Contact Name:** Dr Allan Burns

**Organisation:** On behalf of self and McCarthy and Stone (Development) Ltd

**Reference:** 042

**Summary of comments**

2.11.3 Ratio the wrong way round

**Response to comments**

Noted

**Summary of proposed action**

Amend wording of 2.11.3

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**Direct Reference:** Technical

**Contact Name:** John Hammond

**Organisation:**

**Reference:** 044

**Summary of comments**

Photos throughout document need better explanation.

**Response to comments**

Noted

**Summary of proposed action**

Provide caption with each photo.

Needs more examples of good and bad practice cycle storage especially in high density developments.

Noted

Look for better examples.

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**Direct Reference:** Technical

**Contact Name:** Liam Ryan

**Organisation:** Cambell Reith on behalf of themselves and Morgan Sindall

**Reference:** 061

**Summary of comments**

**Response to comments**

**Summary of proposed action**

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<p>It appears that the evidence base is too small to deliver a supplementary planning document that is considered to be “Justified, Effective and consistent with national policy” in accordance with PPS12. Believe that it is appropriate for ECC to prepare a robust and credible evidence base in advance of further consultation on this document and that the draft parking standards should be withdrawn until the evidence base has been prepared and debated.</p>	<p>The evidence base put forward in the revised document is considered more than adequate to demonstrate the issues and consequent steps</p>	<p>None</p>
<p><b>Direct Reference:</b> Technical</p>		
<p><b>Contact Name:</b> Peter Court</p>	<p><b>Organisation:</b> Bovis Homes</p>	<p><b>Reference:</b> 063</p>
<p><b>Summary of comments</b>  P.11 2.1.1 Bovis believe it is inappropriate for ECC to require developers to be responsible for what happens on adjacent highway networks, such matters are beyond the control of developers: these are issues for the County Council and existing residents. Instead developers should be required to meet the stds in this document for their own proposals</p>	<p><b>Response to comments</b>  Developers must prove that sufficient standards are applied to prevent overspill parking in surrounding area on existing highway.</p>	<p><b>Summary of proposed action</b>  None</p>
<p><b>Direct Reference:</b> Environmental Considerations</p>		
<p><b>Contact Name:</b> Phil Sturges</p>	<p><b>Organisation:</b> Natural England</p>	<p><b>Reference:</b> 038</p>
<p><b>Summary of comments</b>  Natural England is pleased to note, at a local scale for individual parking proposals, the SA NTS refers to the need to consider whether the proposals are likely to have a significant effect on the management of a European site (an SAC, SPA (or Ramsar site)). Generally there is little reference to potential impacts on the natural environment in the draft Guide. Such environmental considerations should be included in the Guide, perhaps in an Appendix.</p>	<p><b>Response to comments</b>  The Parking Standards guide will be used in conjunction with development proposals which will go through the standard plan process applied by the LPA involved. At this time the environmental impact will be one of the considerations of due planning process.</p>	<p><b>Summary of proposed action</b>  None</p>



<b>Direct Reference: SUDS</b>		
<b>Contact Name:</b> Lindsay Hinchcliffe	<b>Organisation:</b> Environment Agency	<b>Reference:</b> 013
<b>Summary of comments</b> Any car park or parking area design should include Sustainable Drainage systems (SUDS) in accordance with Approved Document Part H of the Building Regulations 2000. Parking areas often susceptible to oil contamination and should be encouraged to be considered within design, all surface water run off from these areas should pass through an oil separator compatible with the site.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> Add paragraph to document in Guidance section to refer to surface water drainage/permeable materials.
<b>Direct Reference: SUDS</b>		
<b>Contact Name:</b> Phil Sturges	<b>Organisation:</b> Natural England	<b>Reference:</b> 038
<b>Summary of comments</b> The SA NTS states that the Parking Standards document should emphasise the need for sustainable drainage systems and pollutant filters to be designed into parking areas as well as highlighting more clearly the need to fully address flooding and water quality impacts. We concur with this view. Sustainable drainage systems also have the added benefit of providing habitat creation (e.g. reedbeds, ponds and swales), which would enhance environmental quality.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> Add further commentary re SUDS in 2.2
<b>Direct Reference: Monitoring Framework</b>		
<b>Contact Name:</b> Phil Sturges	<b>Organisation:</b> Natural England	<b>Reference:</b> 038
<b>Summary of comments</b> We agree that the adopted document should contain a Monitoring Framework that includes realistic indicators that assess the effectiveness of the Guide, contributing to increased use of sustainable forms of transport.	<b>Response to comments</b> Monitoring the effectiveness of the new planning guide will be carried out by the working group. However, it has to be acknowledged that this must be a medium term aspiration as development using the new standards will not be	<b>Summary of proposed action</b> None

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in place until 2011/12 at the earliest.

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**Direct Reference:** Enforcement

**Contact Name:** Susan Rouse

**Organisation:** Ridgewell Parish Council

**Reference:** 025

**Summary of comments**

What legislation is available to enforce non-descript parking.

**Response to comments**

The document looks at Design and Good Practice, not enforcement/legislation.

**Summary of proposed action**

None

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**Direct Reference:** Enforcement

**Contact Name:** Cllr Perry

**Organisation:** Saffron Walden Town and Uttlesford District Councillor

**Reference:** 071

**Summary of comments**

It is a good sound advisory document but it doesn't go far enough. Standards must have enforcement, not just 9 to 5 Monday to Friday and there must be legislation in support e.g. parking on the footway. There is no mention of red routes or controlled pavement parking which has been effective in London Boroughs.

**Response to comments**

The standards need to go hand in hand with enforcement, although the document is not about enforcement.

**Summary of proposed action**

None

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**Direct Reference:** Cycling

**Contact Name:** Laura Chase

**Organisation:** Colchester Borough Council

**Reference:** 024

**Summary of comments**

P.45 3.6.3 Reword to say "conveniently located for the cycle parking user in a secure area"

**Response to comments**

Noted

**Summary of proposed action**

Amend 3.6.3.

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**Direct Reference:** Cycling

**Contact Name:** Steve Charman

**Organisation:** Brentwood Borough Council

**Reference:** 036

**Summary of comments**

The revised cycle parking standards are commended as being more realistic and less likely to result in the considerable overprovision which presently occurs, particularly in large developments. The overprovision brings the current standards into disrepute.

**Response to comments**

Noted

**Summary of proposed action**

None

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<b>Direct Reference:</b> Cycling		
<b>Contact Name:</b> John Pollard	<b>Organisation:</b> Chelmsford Borough Council	<b>Reference:</b> 037
<b>Summary of comments</b> 2.10 No evidence as to level of usage of cycle parking. Further investigation is required including usage surveys of existing cycle parking	<b>Response to comments</b> Due to the fact that existing cycle parking standards are so onerous, the full standard rarely gets built so there is little evidence on the ground. The parking standards proposed were agreed by all working party members on observed usage.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Cycling		
<b>Contact Name:</b> Phil Sturges	<b>Organisation:</b> Natural England	<b>Reference:</b> 038
<b>Summary of comments</b> 2.10: Regarding the provision of cycle parking, we recognise the significant positive impact of cycling through the promotion of healthy and active lifestyles. We support the minimum Cycle Parking Standard which will promote this sustainable transport option.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Cycling/PTW		
<b>Contact Name:</b> Ian Bradley	<b>Organisation:</b> Great Waltham Parish Council	<b>Reference:</b> 039
<b>Summary of comments</b> Para 2.10 and 3.6, and 2.11 Cycle and 2 wheeler parking. Skirts around the issue of security. It says that there should be secure parking, CCTV should be provided but gives no practical view of how this can be achieved. It is understood that bicycle thefts from Chelmsford railway station is high – this is where the carrot should come in – if we can't make the station secure, what is the hope for anywhere else.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> Expand on security guidance for cycles and powered two wheelers.
<b>Direct Reference:</b> Cycling		
<b>Contact Name:</b> Dr Allan Burns	<b>Organisation:</b> On behalf of self and McCarthy and Stone (Development) Ltd	<b>Reference:</b> 042

<b>Summary of comments</b> 2.10.6 This sentence reads like all developments have travel plans, suggests it should be reworded to say 'where a travel plan is in place'. What happens if it is physically impossible to increase provision?	<b>Response to comments</b> Noted. Where provision is impossible, look at on a case by case basis.	<b>Summary of proposed action</b> Amend 2.10.6
<b>Direct Reference:</b> Cycling		
<b>Contact Name:</b> John Hammond	<b>Organisation:</b>	<b>Reference:</b> 044
<b>Summary of comments</b> P.16 2.10 Section should be clear that cycle parking arrangements must be integrated into plans before Planning Permission is granted, not left to chance by only having cycle parking as a planning condition.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> Add comment to 2.10.1
There is only value in having standards if they are implemented. Sample monitoring of provision should occur and any problems with good practice raised with the case officer.	Provision is reviewed via Travel Plan monitoring.	None
<b>Direct Reference:</b> Cycling/ Powered Two Wheelers		
<b>Contact Name:</b> John Hammond	<b>Organisation:</b>	<b>Reference:</b> 044
<b>Summary of comments</b> P.19 2.11.3 It is inappropriate to make powered two wheelers or cycle parking spaces a ratio of car parking maximum. Should developer not provide any vehicle space, no powered two wheeler spaces would be provided.	<b>Response to comments</b> A minimum of 1 powered two wheeler space is required across the board. Cycle standards are not based on vehicle provision.	<b>Summary of proposed action</b> None
P64 cycle and powered two wheelers need to have their own minimum standards, not based on vehicle spaces.	A minimum of 1 powered two wheeler space is required across the board. Cycle standards are not based on vehicle provision.	None
<b>Direct Reference:</b> Cycling		
<b>Contact Name:</b> John Hammond	<b>Organisation:</b>	<b>Reference:</b> 044
<b>Summary of comments</b>	<b>Response to comments</b>	<b>Summary of proposed action</b>

P.60 The number of cycle storage spaces should be proportional to the number of beds, similar to vehicles spaces and in the Case for Sustainable Homes.	The majority of residential developments will have in-curtilage storage, for apartments, communal storage is available where it is likely there will be extra availability due to not everyone taking up their space allocation.	None
<b>Direct Reference:</b> Cycling		
<b>Contact Name:</b> Paul Munson	<b>Organisation:</b> Braintree District Council	<b>Reference:</b> 067
<b>Summary of comments</b> The document does not provide evidence that cycle parking standards are too onerous, needs to be supported by examples to show that existing provision is under used.	<b>Response to comments</b> Often the LPA's do not require the minimum standard to be built because so many are required, therefore there are few examples on the ground.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Cycling		
<b>Contact Name:</b> Stephen Bolter	<b>Organisation:</b>	<b>Reference:</b> 077
<b>Summary of comments</b> P.43 3.6.2 & 3.6.4 The provision of secure covered cycle storage close to (main) entrances is a severe constraint on design. There is no reason why cyclists should have a specially privileged position.	<b>Response to comments</b> Disagree, as a sustainable transport options, cycling should be promoted	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Powered Two Wheelers		
<b>Contact Name:</b> Alan Gillard	<b>Organisation:</b> Motorbike enthusiast	<b>Reference:</b> 003
<b>Summary of comments</b> Submission provides in depth information regarding the parking design and layout requirements of Powered Two Wheelers. Advice includes: Cobbles and gravel destabilise machines, level ground is ideal, bikes are heavy to pick up, bikes can damage soft tarmac surfaces. Bay size is important, adequate width to prevent knocking and overbalancing, adequate length to allow bike to be clear of highway, and adequate height to allow for bike to enter with rider on top (e.g. think PTW parking under car park ramps). Access can be a problem, consider PTW turning circles, adequate clearance from	<b>Response to comments</b> Useful information from first hand experience.	<b>Summary of proposed action</b> Include points raised to reword section 3.5 Powered Two Wheeler Parking Design, to provide better guidance.

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highway. Exclude drain covers/grids, manhole covers, studs, cat's eyes, cobbles, soft tarmac, and cars form PTW parking areas. Dropped kerbs are important for access. Horizontal hitchings are best, off the ground. Bikes parks can be a haven for thieves, cameras, bollards, lighting etc help, parking should be located in a visible area, not "around the back", covered parking is a benefit. Lockers large enough to fit crash helmets in are important along with riding gear.

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**Direct Reference:** Powered Two Wheelers

**Contact Name:** Matthew Last

**Summary of comments**

Powered Two Wheeler standards are considered excessive given the level of ownership. Census Travel to work data suggests 1/30 car spaces is adequate.

**Organisation:** Ardent Consulting

**Response to comments**

The Parking Standards working group believes the revised standard is acceptable. Powered Two Wheel use is considered a sustainable mode of transport and should be encouraged.

**Reference:** 028

**Summary of proposed action**

None

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**Direct Reference:** Powered Two Wheelers

**Contact Name:** Pam Herbert

**Summary of comments**

Statement 12 – Powered two wheelers cannot possibly be contributing to a reduction in noise pollution as they, generally, are far noisier than cars and light vans.

**Organisation:** Earls Colne Parish Council

**Response to comments**

Unsure what statement 12 is? Powered Two Wheel use is considered a sustainable mode of transport and should be encouraged.

**Reference:** 030

**Summary of proposed action**

None

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**Direct Reference:** Powered Two Wheelers

**Contact Name:** John Pollard

**Summary of comments**

The revised standards appear to be adequate but in view of the increase in popularity of powered two wheelers (PTW) in recent years surveys of usage of existing PTW parking should be carried out.

**Organisation:** Chelmsford Borough Council

**Response to comments**

The existing standard was discussed with the working group and in view of evidence on the ground and from the experience of the group, it was decided to revise the standards.

**Reference:** 037

**Summary of proposed action**

None

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**Direct Reference:** Powered Two Wheelers

**Contact Name:** Dr Allan Burns

**Organisation:** On behalf of self and McCarthy and Stone (Development) Ltd

**Reference:** 042

**Summary of comments**

2.11.4 Blanket requirement not appropriate. Residents of sheltered housing for the elderly would not likely own a P2W. Guidance should allow for exceptions.

**Response to comments**

Noted

**Summary of proposed action**

Amend the standard for Retirement/Warden Controlled Developments. The full powered two wheeler requirement is not necessary, there should still be some provision for staff, and also some provision made for secure and covered mobility scooter parking.

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**Direct Reference:** Powered Two Wheelers

**Contact Name:** Dr Allan Burns

**Organisation:** On behalf of self and McCarthy and Stone (Development) Ltd

**Reference:** 042

**Summary of comments**

2.11.6 This sentence reads like all developments have travel plans, suggests it should be reworded to say 'where a travel plan is in place'. What happens if it is physically impossible to increase provision?

**Response to comments**

Noted. Where provision is impossible, look at on a case by case basis.

**Summary of proposed action**

Amend 2.11.6

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**Direct Reference:** Disabled

**Contact Name:** Brian Upton

**Organisation:** Community Inclusion, ECC

**Reference:** 016

**Summary of comments**

3.3.3 Could dimensions of disabled parallel parking bays be increased to cater for rear access ramps?

**Response to comments**

Ramps are used by the minority of disabled drives/passengers. To require all parallel bays to be extended in length would demand too much land take.

None

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**Direct Reference:** Disabled

**Contact Name:** Brian Upton

**Organisation:** Community Inclusion, ECC

**Reference:** 016

**Summary of comments**

3.4 Make reference to tactile distinction on a shared surface similar to 3.1.4

**Response to comments**

Comment too detailed for Parking Standards Design and Good Practice document.

**Summary of proposed action**

None

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**Direct Reference:** Disabled

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<b>Contact Name:</b> Brian Upton	<b>Organisation:</b> Community Inclusion, ECC	<b>Reference:</b> 016
<b>Summary of comments</b> 3.4 Could consideration be given to providing a disabled parking space for visitors?	<b>Response to comments</b> P.60/61 deals with disabled parking at residential developments.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Disabled		
<b>Contact Name:</b> Brian Upton	<b>Organisation:</b> Community Inclusion, ECC	<b>Reference:</b> 016
<b>Summary of comments</b> 3.4.26 Retirement/Warden Controlled Developments - provide space for mobility scooters to be safely charged outside preventing H&S issues in hallways and consider standards for mobility scooters.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> The full powered two wheeler requirements at Retirement/Warden Controlled developments are not necessary, there should still be some provision for staff, and also some provision made for secure and covered mobility scooter parking.
<b>Direct Reference:</b> Disabled		
<b>Contact Name:</b> Brian Upton	<b>Organisation:</b> Community Inclusion, ECC	<b>Reference:</b> 016
<b>Summary of comments</b> 2.12 Emphasise advice in section 2.12 Provision for Disabled Parking in S.4	<b>Response to comments</b> No need to provide same advice in two locations within the document.	<b>Summary of proposed action</b> Add a paragraph to beginning of Section 4 to state S.4 should be used in conjunction with previous sections of the document.
<b>Direct Reference:</b> Disabled		
<b>Contact Name:</b> Pam Herbert	<b>Organisation:</b> Earls Colne Parish Council	<b>Reference:</b> 030
<b>Summary of comments</b> 2.12.2 – A review of the number disabled spaces required should be carried out periodically to ensure they reflect the demand. Currently experience shows that there is an overprovision in many public car parks (i.e. a large number of spaces are always empty).	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Disabled		
<b>Contact Name:</b> John Pollard	<b>Organisation:</b> Chelmsford Borough Council	<b>Reference:</b> 037
<b>Summary of comments</b> 3.3 British Standard BS 8300:2009 'Design of buildings and their approaches to meet the needs of disabled people – Code of practice' came into	<b>Response to comments</b> There are various sources of guidance on this subject. Guidance given in the Parking Standards document is in line with other guidance.	<b>Summary of proposed action</b> Make reference in 3.3 Disabled Parking Design to varying guidance available. Add a paragraph to section 3.3 to state that whilst all guidance varies slightly, the guidance given within the



<p>affect on 28 February 2009. Section 4 of the document covers 'Car parking, garaging, and setting-down and picking-up points'. Section 3.3 of the consultation document should be revised based upon this document.</p>		<p>Parking Standards document has taken account of the trend for increased vehicle size and the increased bay size within the document is supported by disability groups.</p>
<p>The language used in the consultation document 'disabled parking' is not good practice. All references in the document to 'disabled parking' should be changed to 'accessible parking' as this is the correct terminology. The agreed emblem of disability is a world agreed emblem and not a British Standard.</p>	<p>Accessible parking implies it is accessible to everyone. Consulted with ECC Community Inclusion Officer who states the Options for Independent Living group feels the section should be title "Blue Badge Parking".</p>	<p>Change section title to "Blue Badge Parking"</p>
<p>Section 4.1, Figure 1 of BS 8300:2009 gives dimensions for designated on street parking bays. Section 4.2.1 of BS 8300:2009 specifies levels of provision of accessible parking for workplaces, shopping, recreation and leisure facilities, railway car parks, religious buildings and crematoria, and sports facilities. Sections 4.2.2 and 4.2.3 address design and layout, access to, and location of designated off-street parking spaces. This should be incorporated into the parking standards document.</p>	<p>There are various sources of guidance on this subject. Guidance given in the Parking Standards document is in line with other guidance. The standards outlined in BS 8300:2009 are similar to that in TAL 5/95 but go further in suggesting in addition to disabled parking provision, a proportion of enlarged standard spaces should be required. The revised standards meet this by requiring bays of an increased size to previous standards.</p>	<p>None</p>
<p>The laying of drop kerbs (paragraph 3.3.5 of consultation document) should follow 'Guidance on the use of Tactile Paving Surfaces' DETR. (paragraph 3.3.5 of consultation document).</p>	<p>Noted</p>	<p>Insert reference in paragraph 3.3.5</p>
<p>The design element of this section is weak. It only refers to lines, hatchings, dropped kerbs etc. It should draw attention to design led treatments. One good example is the central car park in Bury St Edmunds which has some very well designed accessible parking bays marked by way of good</p>	<p>Noted</p>	<p>None</p>

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quality materials avoiding any need for painted lines and hatchings.

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**Direct Reference:** Disabled

**Contact Name:** David Porth

**Organisation:** Sturmer Parish Council

**Reference:** 041

**Summary of comments**

3.3 Disabled parking spaces are often overprovided – is the correct population ratio applied when determining the distribution of disabled parking spaces?

**Response to comments**

The standard is taken from National Guidance

**Summary of proposed action**

None

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**Direct Reference:** Disabled

**Contact Name:** Kevin Wright

**Organisation:** Epping Forest District Council

**Reference:** 045

**Summary of comments**

Disability Equality Consultative Group suggests businesses are encouraged to designate 5% of their parking bays for disabled users.

**Response to comments**

This is the case with car parks 200 bays or less.

**Summary of proposed action**

None

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**Direct Reference:** Disabled

**Contact Name:** Stephen Bolter

**Organisation:**

**Reference:** 077

**Summary of comments**

P.20 2.12.2 The minimum disabled parking space requirement for small units (e.g. 3 bays for a small retail kiosk) is too great. (If the kiosk only 5m2 GFA, then the total number of spaces must not exceed 1, of which 3 must be for the disabled!! That is 300% of the spaces must be for the disabled!!)

**Response to comments**

Noted

**Summary of proposed action**

Add note to table in 2.12.2 to state that in cases where the number of vehicle parking bays are less than 10, the LPA will consider Blue Bad Parking provision on a case by case basis, taking into account the quantity of available Blue Badge Parking in the vicinity.

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**Direct Reference:** Blue Badge

**Contact Name:** Pam Herbert

**Organisation:** Earls Colne Parish Council

**Reference:** 030

**Summary of comments**

If it is considered, as the Highway Code suggests, that it is undesirable on safety grounds for vehicles to park on double yellow lines, how does the displaying of a Blue Disabled Badge change the situation?

**Response to comments**

Not appropriate for this document.

**Summary of proposed action**

None

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**Direct Reference:** Planning Obligations

**Contact Name:** David Linnell

**Organisation:** Loughton Residents Association

**Reference:** 022

**Summary of comments**

P.20 2.13.1 Needs more emphasis on S106 obligations, e.g. for bus services, infrastructure etc to encourage modal shift.

**Response to comments**

Not appropriate for this document

**Summary of proposed action**

None

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**Direct Reference:** Planning Obligations

**Contact Name:** Dr Allan Burns

**Organisation:** On behalf of self and McCarthy and Stone (Development) Ltd

**Reference:** 042

**Summary of comments**

2.13.1 The implication of this paragraph is that all parking standards are minimum requirements. It could be interpreted as meaning that unless the full standards are not achieved, the Authority will seek a contribution. Reword

**Response to comments**

Noted

**Summary of proposed action**

Reword

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**Direct Reference:** Transport Assessments

**Contact Name:** Shaun Scrutton

**Organisation:** Rochford District Council

**Reference:** 055

**Summary of comments**

P.21 2.14.1 Suggest including a sentence "The scope of a TS or TA should be agreed at the pre-application stage between the LPA and the developer".

**Response to comments**

Not relevant for this document but TS/TA scope should be agrees with Highway Authority.

**Summary of proposed action**

None

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**Direct Reference:** Travel Plans

**Contact Name:** Roland Mills

**Organisation:** Ashford Borough Council

**Reference:** 007

**Summary of comments**

P.58 makes reference to the important role Travel Plans have with staff, patient and visitors at hospitals, but hospitals only really have influence over staff, not the general public

**Response to comments**

Whilst it is agreed a travel plan will mainly aim to influence staff, Hospitals in Essex use travel plans and travel influencing tools to influence visitors and patients too.

**Summary of proposed action**

None

<b>Direct Reference:</b> Travel Plans		
<b>Contact Name:</b> Laura Chase	<b>Organisation:</b> Colchester Borough Council	<b>Reference:</b> 024
<b>Summary of comments</b> P.45 3.6.1 Ref should be made to the importance of travel plans which will identify the number of spaces needed for cycle parking, both at outset and over time	<b>Response to comments</b> To identify the required number of spaces via a Travel Plan will be too late as Travel Plans are not usually in place until after occupation. Travel Plans can be used to monitor uptake and determine if further provision is required.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Travel Plans		
<b>Contact Name:</b> Phil Sturges	<b>Organisation:</b> Natural England	<b>Reference:</b> 038
<b>Summary of comments</b> 2.15: We support the promotion of Travel Plans to encourage people to use their cars less.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Travel Plans		
<b>Contact Name:</b> Sustainable Business Travel Team	<b>Organisation:</b> Essex County Council	<b>Reference:</b> 046
<b>Summary of comments</b> P.iii Para 4. The Sustainable Business Travel Team has not been listed as a member of the review group and believes they should be.	<b>Response to comments</b> The Sustainable Business Travel Team was not part of the working group.	<b>Summary of proposed action</b> None
P.7 1.2.3 Point 2 Statement misleading, assumes 70% inaccessibility discouraging PT as an option.	Noted	Amend wording
P.9 1.2.4 Would like to challenge statement.	Noted	None
P.11 2.2.3 Support comment.	Noted	None
P.12 2.2.6 Supports statement but adds "for example, near stations, bus routes etc."	Noted	None
P.13 2.5.1 replace "may be" with "Should".	Disagree, need flexibility.	None
P.14 2.7.1 developer guidelines, including reference to Travel Plan.	Not required in Parking Standards guidance	None

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P.17 2.10.3 Shouldn't we be ensuring developers provide cycle parking spaces on site and not offering them a way out?	On-site is preferable but not always possible.	None
P.17 2.10.5 These facilities should be safe, secure, covered and well lit.	Covered is preferable, but at short stay locations not always essential.	None
P.17 2.10.6 Developments are not static. Opportunity for future residents	Noted	None
P.20 After 2.12.5 A section on car share provision would be welcome here.	Car share is mentioned in section 2.15.	None
P.20 2.13.1 Clarification required - who would this contribution go to and what would it be spent on.	Noted	Reword paragraph
P.21 2.15.6 Annual monitoring of travel plan provides the opportunity to review parking for sustainable modes, e.g. cycles, P2W and car share spaces.	Noted	Reword paragraph
P.21 2.15.1-2.15.7 Perhaps we could have been asked to write our own section?	Noted	None
P.31. 3.4.8 Cycle parking/storage is not visible in these drawings.	Cycle parking would be provided within the curtilage of the dwelling.	None
P.45 3.6.2 All cycle parking must be secure and covered with no exceptions to this.	Noted	Amend wording
P.58 paragraph 3 Support statement.	Noted	None
P.63 3/4 The contact details for the safer journeys team should be included here. Charlotte Humphries 01245 437542.	Travel Plan contact details are provide in 2.15.7 as a generic email address rather than mentioning specific staff names.	None

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P.73 Appendix. No mention here of any Travel Plan guidance which is available to developers.	The appendix refers to documents mentioned within the guidance.	None
<b>Direct Reference:</b> Travel Plan		
<b>Contact Name:</b> Shaun Scrutton	<b>Organisation:</b> Rochford District Council	<b>Reference:</b> 055
<b>Summary of comments</b> P.21 2.15 Section too focused on destinations. Discuss benefits of Travel Plans for residential developments. Might be useful to state that LPA's may set out particular circumstances in which a travel plan is required.	<b>Response to comments</b> Residential Travel Plans are covered under the Transport Information and Marketing Scheme.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Travel Plans		
<b>Contact Name:</b> Peter Court	<b>Organisation:</b> Bovis Homes	<b>Reference:</b> 063
<b>Summary of comments</b> P.21 2.15.2 Development and implementation of Travel Plans is a task for County Council. Travel Plans can be developed over time. Residential developments should not be required to do this.  P21 2.15.3 No need to request a Transport Information and Marketing Scheme, since these will be included in Design and Access Statement.	<b>Response to comments</b> For commercial developments with 50 or more employees, a travel plan is required to be provided by the developer. For residential developments of 10 or more dwellings, a Transport Information and Marketing Pack is required as a form of site specific travel plan to be provided by the developer.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Parking Bays		
<b>Contact Name:</b> Andrew Ward	<b>Organisation:</b> Royal Haskoning	<b>Reference:</b> 017
<b>Summary of comments</b> 3.2.1 Objecting to parking bays sizes (p.22-26). Manual for Streets states 2.4m x 4.8m. New standards are contrary to recognised practice outlined by The Institution of Structural Engineers, mentioning a "Standard car". No scope provided for reducing aisle width to reclaim land lost as a result of larger spaces.	<b>Response to comments</b> Bay sizes are based on observation and dimensions of manufactured cars, allowing room to open doors to enter/exit vehicle. Bays are required to be large due to larger cars being manufactured, therefore aisle widths should not be reduced to make manoeuvring even more tight/impossible.	<b>Summary of proposed action</b> None

<b>Direct Reference:</b> Parking Bays		
<b>Contact Name:</b> Andrew Ward	<b>Organisation:</b> Royal Haskoning	<b>Reference:</b> 017
<b>Summary of comments</b> 3.3.3 Objecting to Disabled bay increase in dimensions. TAL 5/95 states 2.4m x 4.8m plus 1.2m to either side or rear. New stds not that same ratio, actually providing only 1m extra but on increased parking bay size. Dimensions suggested are very different from national guidance and would be wary of change. Unclear where 2.9m x 5.5m derived from.	<b>Response to comments</b> Disabled bay size is based on the amended vehicle bay size 2.9m by 5.5m (required to be larger due to increased car dimensions and to allow for door opening), disabled bays are only required an extra 1m on this because extra space is provide within the initial bay dimensions compared to previous standards.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Parking Bays		
<b>Contact Name:</b> Councillor K Ferguson	<b>Organisation:</b> Little Baddow Parish Council	<b>Reference:</b> 020
<b>Summary of comments</b> Minimum parking bay is too small. An estate car is around 2.0m wide by 4.8m long and requires an overall width of 2.55m if both driver and passenger are to enter/exit the vehicle, 4x4 and 2 door cars often have longer doors which need more room to open. 3.2.5 The row gap is not wide enough, greater length should be specified if 2.9m is not the min std width. Picture on p24 shows tree with kerbing (diamond), these severely restrict parking of larger vehicles and should have specified ratio of spaces without corner cut offs and a maximum size the diamonds should be.	<b>Response to comments</b> Bay sizes are based on observation and dimensions of manufactured cars, allowing room to open doors to enter/exit vehicle.	<b>Summary of proposed action</b> Add a paragraph to page 24 commenting on the careful selection of landscaping features within a car park so not to affect the bay sizes.
<b>Direct Reference:</b> Parking Bays		
<b>Contact Name:</b> Laura Chase	<b>Organisation:</b> Colchester Borough Council	<b>Reference:</b> 024
<b>Summary of comments</b> P.23 3.2.1 Having preferred and minimum bay size without explanation of when would be acceptable is pointless, smaller one will be used all the time. Parallel park lengths in 3.2 should	<b>Response to comments</b> Preferred bay size should be used as standard. In exceptional circumstances the minimum bay size may be used as determined by LPA. Disabled parallel spaces are 1m in length longer than a	<b>Summary of proposed action</b> Add a paragraph to P.23 3.2.1 to clarify that preferred bay size should be used in vast majority of situations.

agree with disabled of 6.5m in 3.3.3 - no need to have smaller std as well as disabled	standard bay due to increased spaces requirements (e.g. ramp, wheelchair).	
<b>Direct Reference: Parking Bays</b>		
<b>Contact Name:</b> Jackie Lowe	<b>Organisation:</b> Construction Management Group, ECC	<b>Reference:</b> 026
<b>Summary of comments</b> Why are bay sizes getting bigger when the government's agenda is greener smaller cars?	<b>Response to comments</b> Bay sizes are based on observation and dimensions of manufactured cars, allowing room to open doors to enter/exit vehicle.	<b>Summary of proposed action</b> None
<b>Direct Reference: Parking Bays</b>		
<b>Contact Name:</b> John Pollard	<b>Organisation:</b> Chelmsford Borough Council	<b>Reference:</b> 037
<b>Summary of comments</b> 3.2.1 It is important that parking bay sizes are appropriate to the size of today's cars. The proposed changes are welcomed.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None
<b>Direct Reference: Parking Design</b>		
<b>Contact Name:</b> David Porth	<b>Organisation:</b> Sturmer Parish Council	<b>Reference:</b> 041
<b>Summary of comments</b> 3.2.5 Chevron system of parking preferred to the 90 degree system	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None
<b>Direct Reference: Parking Bays</b>		
<b>Contact Name:</b> David Porth	<b>Organisation:</b> Sturmer Parish Council	<b>Reference:</b> 041
<b>Summary of comments</b> 3.2 Vehicle bay sizes should take account of new design of vehicles including features such as door size.	<b>Response to comments</b> The revised bay sizes have taken this into account	<b>Summary of proposed action</b> None
<b>Direct Reference: Parking Bays</b>		
<b>Contact Name:</b> Dr Allan Burns	<b>Organisation:</b> On behalf of self and McCarthy and Stone (Development) Ltd	<b>Reference:</b> 042
<b>Summary of comments</b> 3.2.1 & 3.3.3 Parking bays are significantly larger	<b>Response to comments</b> Noted. Bay sizes are based on observation and	<b>Summary of proposed action</b> None



than advice given in national guidance. This would result in a less efficient use of land, contrary to other national guidance e.g. PPS3. Would this guidance be supported at a planning appeal? A survey of residents of sheltered housing, for example, showed that the most popular vehicle owned was a Nissan Micra, a small vehicle. The survey showed that 95% of resident's cars were 4.47m long or less, and 1.73m wide, or less. The application of these suggested standards in sheltered housing development would be unnecessarily restrictive and wasteful of expensive urban brown field land.

dimensions of manufactured cars, allowing room to open doors to enter/exit vehicle.

Elderly people require more room to get in/out of vehicles (e.g. doors open wider to allow for sticks/walkers/wheelchairs etc.) due to decreased manoeuvrability.

Disability groups have requested even larger bays.

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**Direct Reference:** Parking Bays

**Contact Name:** Peter Court

**Organisation:** Bovis Homes

**Reference:** 063

**Summary of comments**

**Response to comments**

**Summary of proposed action**

P.23 3.2.1 Minimum bay size is acceptable, preferred bay size is excessive, especially if a further 1m is required for wheelchair users.

Our research of car sizes indicates that the preferred bay size is appropriate. However minimum bay sizes can be used in appropriate circumstances as viewed by the LPA.

None

P26 3.3.3 The additional 1m should be capable as being common to 2 parking spaces. Furthermore the min bay size should be 5 x 2.5m in common with the general parking std.

The additional 1m can be shared. The disabled bay size is in line with the preferred bay size with additional room to manoeuvre.

None

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**Direct Reference:** Parking Bays

**Contact Name:** Stephen Bolter

**Organisation:**

**Reference:** 077

**Summary of comments**

**Response to comments**

**Summary of proposed action**

P.23 3.2.1 The increase in the preferred bay size to allow for the increased size of cars (which are largely due to safety requirements) is most welcome.

Noted

None

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**Direct Reference:** Parking Bays

**Contact Name:** Simon Vernon-Harcourt

**Organisation:** City & Country Group

**Reference:** 078

**Summary of comments**

**Response to comments**

**Summary of proposed action**

<p>After getting bigger, car size are now getting smaller again with people looking to save money on fuel costs etc. 2.4 x 4.8m has worked very well for many years, and we would be concerned about a significant increase in size. Your preferred size of 5.5m x 2.9m will require significantly more hard standing, and the associated loss of green space. It will also result in less space for buildings, particularly on tight urban sites, which will lead to lower densities and less efficient use of land. For these reasons we would be concerned at the increase in spaces requirements. The 2.4 x 4.8m works fine for car parks where opening doors can overlap into adjacent spaces, and the 5.5 x 2.9 may be more suited to standalone private houses where they are more likely to have very big cars and 4 wheel drives. It would be useful if perhaps you could recommend different preferred sizes depending on the location – e.g. shared urban residential parking areas 2.4 x 4.8, detached houses in rural areas 5.5 x 2.9 etc. with the developer and planners left to adjust this to the precise local requirements.</p>	<p>The preferred minimum bay size is based on manufactured vehicle sizes.</p>	<p>None</p>
<p><b>Direct Reference:</b> Safer Parking Scheme</p>		
<p><b>Contact Name:</b> Heather Gurden</p>	<p><b>Organisation:</b> Essex Police</p>	<p><b>Reference:</b> 033</p>
<p><b>Summary of comments</b></p>	<p><b>Response to comments</b></p>	<p><b>Summary of proposed action</b></p>
<p>We are totally in support of the contents of the document but would ask consideration be given to include a reference to the Safer Parking Scheme.</p>	<p>Noted</p>	<p>Add a paragraph to mention the BPA after 3.2.10.</p>
<p><b>Direct Reference:</b> Residential</p>		
<p><b>Contact Name:</b> Don Manhire</p>	<p><b>Organisation:</b> Car Free UK</p>	<p><b>Reference:</b> 002</p>
<p><b>Summary of comments</b></p>	<p><b>Response to comments</b></p>	<p><b>Summary of proposed action</b></p>
<p>P.60 C3 class use: No provision is made for car</p>	<p>From experience across Essex, car free or low</p>	

free development, needs provision for car club vehicles on edge of developments and inside, no individual parking. Standard too rigid and inflexible. Car free would encourage sustainable methods of transport	provision developments only work in urban locations with good sustainable transport. This would only account for a small proportion of development within Essex	Reword final paragraph on P.61 to mention car clubs in no/low parking provision developments.
<b>Direct Reference:</b> Residential		
<b>Contact Name:</b> Andrew Lainton	<b>Organisation:</b>	<b>Reference:</b> 006
<b>Summary of comments</b> Proposed changes to residential standards poses concern for increased land take with the larger garages/more parking required.	<b>Response to comments</b> Agree that proposed changes to residential standard will impact on land take, however, it is acknowledged through various different means that the current residential standards are not working.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Residential		
<b>Contact Name:</b> Cllr M Garnet	<b>Organisation:</b>	<b>Reference:</b> 009
<b>Summary of comments</b> Supports the new standards but would like to see 4 bedroom houses requiring more than just 2 spaces. Agrees with increase in garage size.	<b>Response to comments</b> Proposed Residential standards are a minimum, should developers wish to provide more than 2 spaces at dwellings of 2+ bedrooms they can. A further standard could be deemed as going too far.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Residential		
<b>Contact Name:</b> Andrew Ward	<b>Organisation:</b> Royal Haskoning	<b>Reference:</b> 017
<b>Summary of comments</b> Objecting to min stds for residential (1.2.4 & S4). Contrary to Government Guidance PPG13, PPS3. Minimum standards will mean no disaggregating between location and types of housing developments e.g. flats, houses, affordable, private. New standards secure minimum amount regardless of car ownership levels (contrary to PPS3). New apartment in town centre would require 1.25 spaces per unit, contrary to PPG13 and PPS3. Suggests using	<b>Response to comments</b> The proposed standards are based on observations made across Essex by members of the working group, not data (census data that is some 8 years old). Appropriate locations with good sustainable transport links might not require the full vehicle standard; instead schemes such as car clubs could be employed, in agreement with the LPA.	<b>Summary of proposed action</b> None

WSP/Phil Jones Associates, TRL, & David Lock Associates calculation based on census data. 2 spaces per 2 bed flat will lead to an over provision where average ownership level for 2 bed suburban flats are 0.6-0.9. Suggests using Annex D in PPG13. With minimum standards there is no opportunity to justify lower parking provision via a TA, this could lead to missed opportunities with sustainable travel. DfT guidance for car clubs state that an optimum parking ratio for supporting a car club is 0.8 spaces per unit, the min stds would significantly reduce the opportunity to employ a car club.

**Direct Reference:** Residential

**Contact Name:** Councillor K Ferguson

**Organisation:** Little Baddow Parish Council

**Reference:** 020

**Summary of comments**

**Response to comments**

**Summary of proposed action**

One open space should be provided on 1 bedroom units, as pressure on storage space could result in the garage being used for storage not car parking and there would be no other space provided, likewise, areas with poor Public Transport could see couples in 1 bed properties owning 2 cars.

Only a small number of 1 bed properties are provided with a garage.

None

**Direct Reference:** Residential

**Contact Name:** Laura Chase

**Organisation:** Colchester Borough Council

**Reference:** 024

**Summary of comments**

**Response to comments**

**Summary of proposed action**

3.4.24 setbacks distances are useful but need to apply to all on-plot parking scenarios. Not all illustrations in doc comply with guidance e.g. 3.4.13 Cala Domus

Agree

Amend text in 3.4.23. Amend drawing under 3.4.13 to show shared surface, not footway.

**Direct Reference:** Residential

**Contact Name:** Laura Chase

**Organisation:** Colchester Borough Council

**Reference:** 024

**Summary of comments**

**Response to comments**

**Summary of proposed action**

P.40 3.4.20 + 3.4.21 Undercroft parking should be limited to any one street to ensure active

Noted, but this is a planning matter to be dealt with by the LPA.

None

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ground floors and natural surveillance. Photos used show parking dominated frontages.

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**Direct Reference:** Residential

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**Contact Name:** Susan Rouse

**Organisation:** Ridgewell Parish Council

**Reference:** 025

**Summary of comments**

No reference to large vans parked in residential areas/provision of car parks etc. - need space or be banned

**Response to comments**

Normal vehicles on residential estates are cars, not all vehicles can be catered for within document. Often, new developments covenant commercial vehicles from parking within the estate.

**Summary of proposed action**

None

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**Direct Reference:** Residential

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**Contact Name:** Rowland Pantling

**Organisation:** Association of British Drivers

**Reference:** 027

**Summary of comments**

Sufficient parking in residential areas has been far too inadequate for 20-30 years. The consultation recognises this and hopefully things will improve. Residential roads are being made far too narrow, visitor spaces are necessary

**Response to comments**

Noted

**Summary of proposed action**

None

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**Direct Reference:** Residential

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**Contact Name:** Matthew Last

**Organisation:** Ardent Consulting

**Reference:** 028

**Summary of comments**

P.41 3.4.24 0.5m setback precludes 1.5m x 1.5m pedestrian/vehicle visibility splay as required in the Essex Design Guide. A 1.5m setback would still ensure a distance of only 3.5m from kerb to garage door which should be short enough to deter parking as cars would protrude into the carriageway by about 1m.

**Response to comments**

Observations made across Essex conclude that even with a total setback from the carriageway of 3.5m residents are still parking their vehicles in this manner, protruding into the carriageway and blocking the footway. In recent guidance (Manual for Streets) there appears to be a move away from Pedestrian Visibility Splays, which ECC would agree with in appropriately designed circumstances.

**Summary of proposed action**

None

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**Direct Reference:** Residential

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**Contact Name:** Matthew Last

**Organisation:** Ardent Consulting

**Reference:** 028

**Summary of comments**

Minimum standards are contrary to paragraph 52 of PPG13 and do not take into account tenure or

**Response to comments**

The proposed standards are based on observations made across Essex by members of

**Summary of proposed action**

None

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type (both affect car ownership). 0.25 visitors parking is in excess of 0.2 recommended by Residential Car Parking Research.	the working group	
<b>Direct Reference:</b> Residential		
<b>Contact Name:</b> Matthew Last	<b>Organisation:</b> Ardent Consulting	<b>Reference:</b> 028
<b>Summary of comments</b> No allowance made for lower provision resulting from unallocated parking. If each dwelling had 1 allocated and 1 unallocated then there would be no requirement for additional visitor spaces.	<b>Response to comments</b> The proposed standards are based on observations made across Essex by members of the working group. Reduced parking by way of unallocated spaces, leads to parking issues within a residential estate.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Residential		
<b>Contact Name:</b> Matthew Last	<b>Organisation:</b> Ardent Consulting	<b>Reference:</b> 028
<b>Summary of comments</b> Onus should be on developer to demonstrate that parking provision will be adequate by using census data (para 51 PPS3).	<b>Response to comments</b> The proposed standards are based on observations made across Essex by members of the working group. Census data is currently 8 years old, data this old is considered out of date.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Residential		
<b>Contact Name:</b> Mette McLarney	<b>Organisation:</b> Countryside Properties Plc	<b>Reference:</b> 029
<b>Summary of comments</b> Minimum parking standards are more realistic than maximum and are welcomed.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Residential		
<b>Contact Name:</b> Mette McLarney	<b>Organisation:</b> Countryside Properties Plc	<b>Reference:</b> 029
<b>Summary of comments</b> Garage size of 7m x 3m is not welcome, 3m wide is reasonable, but 7m is not big enough to accommodate cycles, bins and vehicles, but is unnecessarily long for just vehicles. Suggest 6m x 3m as garage space with additional space provided for bins and cycles.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> Noted
<b>Direct Reference:</b> Residential		
<b>Contact Name:</b> Mette McLarney	<b>Organisation:</b> Countryside Properties Plc	<b>Reference:</b> 029
<b>Summary of comments</b> Do not agree with discouraging tandem parking,	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> Amend 3.4.22 to clarify tandem parking is acceptable within

reasonable solution particularly with narrow fronted dwellings.		curtilage of dwelling, but discouraged in parking courts.
<b>Direct Reference:</b> Residential		
<b>Contact Name:</b> Mette McLarney	<b>Organisation:</b> Countryside Properties Plc	<b>Reference:</b> 029
<b>Summary of comments</b> Do not agree rear parking courts should only serve 6 dwellings, if courts are well designed there is no need to limit the number of dwellings they serve. Success or failure depends on design not number.	<b>Response to comments</b> The proposed standards are based on observations made across Essex by members of the working group. 3.4.12 states "...ideally should serve no more than six...."	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Residential		
<b>Contact Name:</b> Pam Herbert	<b>Organisation:</b> Earls Colne Parish Council	<b>Reference:</b> 030
<b>Summary of comments</b> Commercial vehicles parking on residential street need to be addressed in some way.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Residential		
<b>Contact Name:</b> Pam Herbert	<b>Organisation:</b> Earls Colne Parish Council	<b>Reference:</b> 030
<b>Summary of comments</b> <b>3.4.5</b> – On street parking on important and busy thoroughfares (Bus Routes etc.) should only be permitted where a minimum width for two-way traffic is maintained, thus ensuring the primary use of the Public Highway is maintained	<b>Response to comments</b> Noted, covered under 3.4.5.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Residential		
<b>Contact Name:</b> Pam Herbert	<b>Organisation:</b> Earls Colne Parish Council	<b>Reference:</b> 030
<b>Summary of comments</b> <b>3.4.16</b> – The provision of parking areas within the curtilage of properties, rather than garages, would help to ensure that the space is used for the intended purpose	<b>Response to comments</b> Noted, but the option of a garage should still be available so long as it is big enough for its purpose.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Residential		
<b>Contact Name:</b> Pam Herbert	<b>Organisation:</b> Earls Colne Parish Council	<b>Reference:</b> 030
<b>Summary of comments</b> Parking Standards for Dwelling Houses – This standard needs to be strengthened as experience indicates that:	<b>Response to comments</b> Proposed Residential standards are a minimum, should developers wish to provide more spaces they can.	<b>Summary of proposed action</b> None

1. A single bedroom property can easily generate two cars. (Two working adults)
2. A two bedroom property could generate three cars (Working parents and working offspring)

**Direct Reference:** Residential

**Contact Name:** James Turley

**Organisation:** Scott Wilson on behalf of Galliard Homes

**Reference:** 031

**Summary of comments**

Minimum residential standards are contrary to national planning policy, if implemented would undermine the quality of urban design in new development and may render sustainable development unachievable. Contrary to PPS1, PPS12 and PPG13. If minimum standards are introduced, it is unlikely to be possible to build new developments that are of sufficient density to provide essential services within walking distance of new resi development. It is unlikely to be feasible to accommodate high parking levels and at the same time provide a high quality built environment with sufficient usable and attractive open space. Contrary to PPG13 p5 objective 3 "reduce the need to travel, especially by car".

**Response to comments**

Parking Standards, Design and Good Practise acknowledged that current government guidance is not working in Essex and has provided the evidence within the document to back this up.

**Summary of proposed action**

None

**Direct Reference:** Residential

**Contact Name:** Steve Charman

**Organisation:** Brentwood Borough Council

**Reference:** 036

**Summary of comments**

P37 Para 3.4.15 Garages - feels 7m x 3m will be open to challenge. Suggests a garage meeting the following criteria shall be considered a space:  
 1. Min internal length of 5.5m. 2. Min internal width of 3m. 3. Min internal floor area of 21sqm.  
 Thus meaning 5.5m x 3m will be similar to parking bay size. This approach would create a robust document, able to stand up at appeal.

**Response to comments**

The document acknowledges that current garages are not large enough for a modern car. Given the choice of dimension, developers are likely to go for long and narrow garages due to plot sizes. 7m x 3m will provide a good all round space for car and some storage.

**Summary of proposed action**

None

**Direct Reference:** Residential

**Contact Name:** Steve Charman

**Organisation:** Brentwood Borough Council

**Reference:** 036

**Summary of comments**

**Response to comments**

**Summary of proposed action**



<p>P.60 C3. Reverting to minimum standards is strongly supported given the problems we have experienced in developments where maximum standards have been applied. It is recommended a minimum standard of 3 spaces be introduced with four bedrooms and above.</p>	<p>Proposed Residential standards are a minimum, should developers wish to provide more spaces at dwellings they can. A further standard could be deemed as going too far.</p>	<p>None</p>
<p><b>Direct Reference:</b> Residential</p>		
<p><b>Contact Name:</b> John Pollard</p>	<p><b>Organisation:</b> Chelmsford Borough Council</p>	<p><b>Reference:</b> 037</p>
<p><b>Summary of comments</b></p>	<p><b>Response to comments</b></p>	<p><b>Summary of proposed action</b></p>
<p>P.60-61 For the reasons set out above in paragraphs 11 and 12 the proposal that at trip origins (residential parking) standards will become minimum ones is supported in principle but there are a number of concerns. However paragraph 14 outlining the circumstances where reductions in parking standards may be considered needs strengthening to make specific mention of developer initiatives such as the provision by a of a car club. There should also be an acknowledgement that in some circumstances low car or car free development can work satisfactorily. Without greater clarity on the circumstances under which reductions can be made to the parking standards at town centre locations the change to minimum standards cannot be supported at this stage.</p> <p>The current text is not adequate in promoting greater flexibility in urban areas. For central areas in particular, site planning considerations should be design-led and not parking standards-led. PPS3 Housing, paragraph 16 states a design-led approach should be taken to the provision of car-parking space, paragraph 46 also promotes efficient use of land.</p>	<p>The paragraph references are not correct. Comments noted</p>	<p>Strengthen 2.5.1 and P.61 final paragraph.</p>
<p><b>Direct Reference:</b> Residential</p>		
<p><b>Contact Name:</b> John Pollard</p>	<p><b>Organisation:</b> Chelmsford Borough Council</p>	<p><b>Reference:</b> 037</p>

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**Summary of comments**

3.4.14-3.4.16 The concept that garages of 7 metres by 3 metres or larger are considered as a parking space is supported. Encouraging the use of the garage for its appropriate purpose is most welcome but the standard must not be seen to be increasing the prominence of the garage in the street scene. A new section needs to be added about car ports, these are mentioned in 'What is a Parking Space' at paragraph 2.3.1 of the consultation document but barely touched upon further into the document.

Increasing the standard dimensions for garage sizes does instantly lead to the dilemma of the majority of existing garages being well beneath these dimensions. Section 2.7 (extensions and change of use) is relevant, and the developer must demonstrate that adequate parking provision will be provided.

**Direct Reference:** Residential

**Contact Name:** John Pollard

**Summary of comments**

3.4.3 This section is actually about shared surface streets. The consultation document draws specific reference to 'Essex Design Guide, Type 5 Minor Access Way, Shared Use Road'. This does not make it clear that there are actually other shared surface road types in the Essex Design Guide. Instead of saying 'Shared Use Road' it is suggested that the title be amended to 'Minor Access Way' as per Essex Design Guide.

It is proposed that the document discourages this form of parking. If it is to remain in the document it should clearly set out the criteria when it could work. Chelmsford has attempted to discourage

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**Response to comments**

Noted.  
Car Ports are mentioned in 3.4.13

**Summary of proposed action**

None

2.7.1 Strengthen to mention garage change of use

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**Organisation:** Chelmsford Borough Council

**Response to comments**

Noted

**Reference:** 037

**Summary of proposed action**

Amend 3.4.3

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this form of parking and instead as an example, has encouraged drive-through carriage arches to try and avoid cars having an adverse impact on the streetscape and avoiding prominence over dwelling frontages

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**Direct Reference:** Residential

**Contact Name:** John Pollard

**Organisation:** Chelmsford Borough Council

**Reference:** 037

**Summary of comments**

**Response to comments**

**Summary of proposed action**

3.4.6 On-street parking spaces need to be designed into the floorscape of a development avoiding painted markings. Within Chelmsford there are good examples of this at The Square, Broomfield, and Great Leighs Phase 3.

Noted

Strengthen 3.4.6 to mention surface treatments, textures and lining.

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**Direct Reference:** Residential

**Contact Name:** John Pollard

**Organisation:** Chelmsford Borough Council

**Reference:** 037

**Summary of comments**

**Response to comments**

**Summary of proposed action**

3.4.7-3.4.8 Parking squares are great opportunities for good hard landscaped shared surface spaces. The siting of trees and street furniture are used to informally manage parking

Noted

None

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**Direct Reference:** Residential

**Contact Name:** John Pollard

**Organisation:** Chelmsford Borough Council

**Reference:** 037

**Summary of comments**

**Response to comments**

**Summary of proposed action**

3.4.9 Parking courts are relatively inefficient and unattractive uses of land. Combined with outside amenity space requirements, they limit density and for this reason are not suitable for the most sustainable locations. When provided courts should be landscape designed to function as attractive, comfortable spaces. Long narrow access ways to courts should be avoided as these are foreboding, unattractive and can feel insecure. Instead of 'boundary fencing' say 'boundary wall'. A wall is more robust and visually pleasing compared to a close-boarded fence etc.

Noted

3.4.9 Change "fencing" to "treatment"

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**Direct Reference:** Residential

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<b>Contact Name:</b> John Pollard	<b>Organisation:</b> Chelmsford Borough Council	<b>Reference:</b> 037
<b>Summary of comments</b> 3.4.13 The layout in the consultation document is not necessarily a good practice for 'on-plot' parking, as cars are shown parked in front of integral garage space forwards of the building line, which the document is trying to avoid. The document states 'ideally all access should be from the front', it should also make reference as to when rear and side access is appropriate e.g. compact terraces.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> Amend drawing under 3.4.13. Amend wording in 3.4.13
<b>Direct Reference:</b> Residential		
<b>Contact Name:</b> John Pollard	<b>Organisation:</b> Chelmsford Borough Council	<b>Reference:</b> 037
<b>Summary of comments</b> 3.4.19-3.4.21 More guidance for underground, underdeck and undercroft parking provision is needed. There should also be discussion of remote multi-storey parking within residential developments	<b>Response to comments</b> Further details can be found in the ECC Urban Place Supplement	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Residential		
<b>Contact Name:</b> John Pollard	<b>Organisation:</b> Chelmsford Borough Council	<b>Reference:</b> 037
<b>Summary of comments</b> 3.4.22 This section needs clarification as to exactly what tandem parking is.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> Amend wording in 3.4.22
<p>This paragraph needs amending. The document states 'tandem parking should be discouraged where possible especially in parking courts' ... 'their provision encourages on-street parking' ... the study referred to is assumed to be the residents survey. Diagrams at 3.4.3, 3.4.4 and 3.4.8 shows 'end-to end' parking, which can be an efficient layout to help reduce impact of car on the street scene. The paragraph should state that this is encouraged on plot and discouraged in parking courts. The paragraph includes text about bin storage and it is of course important</p>		

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that bin storage is also designed into a scheme to avoid the threat of the use for parking being reduced.

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**Direct Reference:** Residential

**Contact Name:** John Pollard

**Organisation:** Chelmsford Borough Council

**Reference:** 037

**Summary of comments**

3.4.23-3.4.25 The document accepts previous standard 1.5m setback of garage has led to widespread abuse by residents who use this area plus adjacent footway / cycleway / verge to park vehicles perpendicular to the main carriageway creating obstruction. Amending the standard would help to ensure this does not occur as frequently in the future.

**Response to comments**

Noted

**Summary of proposed action**

None

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**Direct Reference:** Residential

**Contact Name:** David Porth

**Organisation:** Sturmer Parish Council

**Reference:** 041

**Summary of comments**

3.4.4 More on-street parking should be provided but drivers must be discouraged from parking on pavements.

**Response to comments**

Noted. This is a design issue.

**Summary of proposed action**

None

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**Direct Reference:** Residential

**Contact Name:** David Porth

**Organisation:** Sturmer Parish Council

**Reference:** 041

**Summary of comments**

P.60 Parking provision for new houses is too low. Account is not taken of expanding households i.e. 2 or 3 children growing up at home and eventually owning cars.

**Response to comments**

Proposed Residential standards are a minimum, should developers wish to provide more spaces at dwellings they can.

**Summary of proposed action**

None

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**Direct Reference:** Residential

**Contact Name:** Dr Allan Burns

**Organisation:** On behalf of self and McCarthy and Stone (Development) Ltd

**Reference:** 042

**Summary of comments**

Minimum residential standard is in conflict with PPS3, PPG13 and draft PPS4. Paragraph 52 in PPG13 has not been deleted. Paragraph 17 of PPG13 has been deleted but paragraphs 52-56 of PPG13 still remain. Draft PPS4 suggests

**Response to comments**

Noted. Parking Standards, Design and Good Practise acknowledged that current government guidance is not working in Essex and has provided the evidence within the document to back this up.

**Summary of proposed action**

None

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deleting paragraphs 53, 54 and annex D of PPG13 but not 52, 55 and 56. The removal of paragraphs does not indicate a move away from use of maximum standards. No justification in moving away from maximum standards. The guidance in the form of SPD will be in direct conflict with current government guidance.

P.i paragraph 5 - PPS 4 is only a draft and paragraphs 53, 54, and annex d of PPG13 will not be cancelled until PPS4 is released in a final form. Paragraph 52 of PPG13 requiring maximum standards will still be present.

P.ii paragraph 5? Use of minimum standards is contrary to PPG13. Issues raised in this paragraph can be satisfactorily addressed by paragraph 51 (2) of PPG13 stating authorities can require more parking to be provided where there are exceptional circumstances.

P.ii paragraph 6? Paragraph does not suggest compliance with PPG13. PPS3 allows authorities to put forward their own maximum standards for housing. It does not indicate that PPG13 can or should be set aside in this way.

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**Direct Reference:** Residential

**Contact Name:** Dr Allan Burns

**Organisation:** On behalf of self and McCarthy and Stone (Development) Ltd

**Reference:** 042

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**Summary of comments**

P.5 1.1.3 Where does PPG13 refer to an aim to reduce car ownership? It only refers to the aim of reducing the use of the car. Draft PPS4 maintains use of maximum standards for non-residential development but does not indicate that maximum standards do not apply to residential development. It considers Sustainable Economic

**Response to comments**

Noted

**Summary of proposed action**

Reword 1.1.3 and 1.2.4 with correct statement

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Development and would be unlikely to do so for housing.

P.9 1.2.4 Where has the Government advised that car ownership should be reduced through reducing parking availability? Higher levels of residential parking can be achieved by higher maximum levels and using guidance in PPG13 to ensure significantly lower levels of provision do not cause problems. Changing maximum to minimum standards is not appropriate.

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**Direct Reference:** Residential

**Contact Name:** Dr Allan Burns

**Organisation:** On behalf of self and McCarthy and Stone (Development) Ltd

**Reference:** 042

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**Summary of comments**

3.1.2/3.1.3 This sentence appears to rule out the use of shared surface roads/accesses. Well designed shared surface accesses/roads are acceptable and so some clarification is needed

**Response to comments**

Noted

**Summary of proposed action**

Amend wording to 3.1.2

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**Direct Reference:** Residential

**Contact Name:** Dr Allan Burns

**Organisation:** On behalf of self and McCarthy and Stone (Development) Ltd

**Reference:** 042

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**Summary of comments**

3.4.1 Consideration of type of residential development is important. Sheltered housing requirements are quite different from family housing.

**Response to comments**

Noted

**Summary of proposed action**

None

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**Direct Reference:** Residential

**Contact Name:** Dr Allan Burns

**Organisation:** On behalf of self and McCarthy and Stone (Development) Ltd

**Reference:** 042

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**Summary of comments**

3.3.15/16 Garage sizes are excessive, other authorities use 6m x 3m. Cycle parking may be available elsewhere, e.g. garden sheds and so to insist on space being provided for a cycle may not be necessary. Furthermore many houses have a good level of internal storage so a garage

**Response to comments**

Most modern house do not have as much storage as older dwellings.  
From the evidence gathered for the revised document (e.g. survey, car dimensions, etc.) it is clear garages need to be bigger if people are to use them to park a car.

**Summary of proposed action**

None

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is not required for this purpose. Smaller garages should be counted as a parking space unless there is good reason not to. Consider imposing planning condition that a garage is kept available for parking a vehicle, if problems occur, condition could be enforced. Such conditions are imposed on open parking areas.

---

**Direct Reference:** Residential

**Contact Name:** Dr Allan Burns

**Organisation:** On behalf of self and McCarthy and Stone (Development) Ltd

**Reference:** 042

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**Summary of comments**

3.4.26 It is welcomed that the parking standards for this form of housing will be applied flexibly. However, the initial comment that 1 space per unit should be applied is inappropriate.

**Response to comments**

Noted

**Summary of proposed action**

None

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**Direct Reference:** Retirement dwellings

**Contact Name:** Dr Allan Burns

**Organisation:** On behalf of self and McCarthy and Stone (Development) Ltd

**Reference:** 042

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**Summary of comments**

P60/61 Minimum standards are inappropriate and contrary to government guidance. The minimum standard of 1 space per unit for retirement homes with 0.25 visitor spaces is excessive. Recent survey showed peak demand for parking by residents, staff and visitors was less than 0.5 spaces per apartment. Note should be added to 3.4.26 to say the standard would be applied flexibly, based on the nature of the retirement development and any evidence that is submitted on the parking needs. This should apply to all types of parking (car, cycle, PTW)

**Response to comments**

Noted. The Retirement standards remains as is unless the developer can justify less is required.

**Summary of proposed action**

None

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**Direct Reference:** Residential

**Contact Name:** Kevin Wright

**Organisation:** Epping Forest District Council

**Reference:** 045

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**Summary of comments**

EFDC are looking at ways of adopting standards

**Response to comments**

Off the shelf garage doors are a standards size.

**Summary of proposed action**

None

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as part of Development Plan in advance of core strategy.

So long as the car can pass through they do not need to be the width of a garage which allows for doors to open/walk around car.

P.37 3.4.15 A min garage door size would be helpful to ensure doors are large enough.

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**Direct Reference:** Residential

**Contact Name:** Julia Peachey

**Organisation:** Birchanger Parish Council

**Reference:** 050

**Summary of comments**

**Response to comments**

**Summary of proposed action**

P.61 It isn't clear whether the provision of visitor/unallocated parking spaces is mandatory for dwelling houses. E.g. Would a development of four houses require one unallocated space, and a development of eight homes require two?

Noted

Add paragraph to informative notes.

Parking problems in rural areas often stem from the number of cars owned by each household, the fact that garages are often not used for parking and narrow roads. Thus the proposed revisions to residential parking standards which attempt to address these issues are welcomed

---

**Direct Reference:** Residential

**Contact Name:** Cllr Roy Martin

**Organisation:** Hockley Parish Council

**Reference:** 051

**Summary of comments**

**Response to comments**

**Summary of proposed action**

In overall agreement with document. Unclear as to whether both dimensions (3mx7m) must be equalled or exceeded to call a garage a parking space.

Noted. 3.4.15 states minimum dimensions.

None

---

**Direct Reference:** Residential

**Contact Name:** Geoff Boyton

**Organisation:** Brentwood Borough Council

**Reference:** 054

**Summary of comments**

**Response to comments**

**Summary of proposed action**

P.37 3.4.15 Need dimensions for a double garage.

Not necessary

None

P.41 3.4.24 Setbacks ok, subject to no pedestrian safety issue.	Noted	None
P.60 C3 Suggests minimum of 3 spaces with 4 bed + (9% of households in Brentwood own 3 or more vehicles).	Proposed Residential standards are a minimum, should developers wish to provide more spaces at dwellings they can.	None
Visitor standard requires greater clarity, is the 0.25 rounded up as shown in section 2.4 P.13 or 1-3 dwellings require 1 or no visitor parking, appears ambiguous and open to interpretation	Noted	Clarify.
<b>Direct Reference: Residential</b>		
<b>Contact Name:</b> Shaun Scrutton	<b>Organisation:</b> Rochford District Council	<b>Reference:</b> 055
<b>Summary of comments</b>	<b>Response to comments</b>	<b>Summary of proposed action</b>
P.20 2.13.1 If a dwelling has nearby access of a car park then relaxation would be acceptable, however, if that car park closed? Consider each application on its own merits, with no reliance on adjacent sites.	Noted	None
P.37 3.4.14 Question statement "cars are getting bigger" many new ones are ultra compact. Key point is that garages should be large enough to take the majority of cars, but needs to be a compromise, not all garages need to accommodate a Rolls Royce!	Noted	Amend wording to 3.4.14
P.37 3.4.15 Clarification required, statement to the effect that where a garage counts towards parking provision, change of use will not be permitted.	Noted	Strengthen section 2.7
P.42 3.4.26 Fine in principle but fact is developer has argued that provision should be less and been successful on appeal. Is this a realistic	Noted. If the developer can demonstrate to the satisfaction of LPA/HA that a reduction would not be detrimental then a reduction can be accepted.	None

---

policy aspiration?

Include a standard for 4 beds = 3 spaces.

Proposed Residential standards are a minimum, should developers wish to provide more spaces at dwellings they can.

None

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**Direct Reference:** Residential

**Contact Name:** John Maple

**Organisation:** Luton Borough Council

**Reference:** 056

**Summary of comments**

**Response to comments**

**Summary of proposed action**

Generally support the whole document.

Noted

None

P.41 3.4.23, 3.2.24 Set backs reliant on good design to give at least some visibility for/of emerging vehicles.

The document represents a sensible, pragmatic approach to parking standards.

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**Direct Reference:** Residential

**Contact Name:** Susan Deluca

**Organisation:** North Weald Bassett/Birdbrook Parish Council

**Reference:** 057

**Summary of comments**

**Response to comments**

**Summary of proposed action**

Concern that garages are being detailed as a car parking space for residential purposes when in reality they are being used as a storage space. Often on new developments as the minimum standards have been applied the only convenient place for residents to park is on the footway or on the road immediately in front of their property as they can't be bothered to use the allocated parking space often at the side or rear of the building.

Noted. Hence why garages are to be made larger.

None

Undercover parking like that on the Kursaal Estate in Southend creates a no go area and people do not use it, therefore it is quite often left empty whilst other areas on the same estate are

Noted

None

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full.

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**Direct Reference:** Residential

**Contact Name:** Brian Cook

**Organisation:** Boreham Parish Council

**Reference:** 058

**Summary of comments**

**Response to comments**

**Summary of proposed action**

P. 60 For dwelling houses of 4+ bedrooms – minimum of 3 spaces per dwelling.

Proposed Residential standards are a minimum, should developers wish to provide more spaces at dwellings they can.

None

We fully support these proposals with the addition to private dwellings as outlined.

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**Direct Reference:** Residential

**Contact Name:** Liam Ryan

**Organisation:** Cambell Reith on behalf of themselves and Morgan Sindall

**Reference:** 061

**Summary of comments**

**Response to comments**

**Summary of proposed action**

Minimum residential standards will compromise the financial viability of residential development in some locations, particularly on small plots of land or with multi storey apartment blocks, leading to an appeal and the standards being indefensible. Require a) robust base of documented and debated evidence to support the detail of the standards, b) additional parking criteria provision for a greater range of dwelling types and c) flexibility to accommodate different parking requirements in different types of areas with different levels of accessibility to other modes of transport.

Noted

None

P.60 The minimum rate of 2 spaces per 2+ bedroom dwelling appears to be inconsistent with average car ownership in the County and may prejudice the financial viability of some forms of residential development. Either the value should be reduced or separate categories created for 2 bedrooms and 3+ bed roomed dwellings. Perhaps a further correlation could be made

Noted

None

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between the minimum number of spaces, number of bedrooms and accessibility of a site to other modes of transport and other types of land use.

P61 Reference should be made within the advisory notes for discretion to be applied to residential development in town centre locations, in addition to the urban areas comment. A lack of flexibility specific to town centres may affect the financial viability of a development.

Town Centre locations would be considered Urban areas.

Clarify that Town Centres are considered Urban areas in text.

P48-72 Where changes to standards are proposed, there is no evidence base provided. Proposed standards are based on 2 reports, only 1 available on website, this report interviewed respondents predominantly living in privately owned, semi or detached 3+ bed properties. The sample size is too small and standard too specific. The details of the report indicate that 77% say there is adequate or surplus off-street parking. Garages could be used for cars which would reduce the number of vehicles parked on street. It appears the proposed standards are not necessary.

The proposed standards are based on observations made across Essex by members of the working group as well as reports. Garages are not used because they are inadequate in size, hence the change to the minimum size garage considered a parking space. Off street parking is often not appropriately designed.

None

The provision of minimum parking standards for residential development will result in unused parking spaces if parking is to be allocated to specific dwellings. Ideally parking should be provided as a pooled resource in order to maximise its use, however we recognise that it is not appropriate for all types of residential development. This further increases the need for flexibility to be given to the parking standards for different types of residential dwellings.

The revised standards allow flexibility.

None

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**Direct Reference:** Residential

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<b>Contact Name:</b> Peter Court	<b>Organisation:</b> Bovis Homes	<b>Reference:</b> 063
<b>Summary of comments</b> P.40 3.4.22 Whilst ECC is right to discourage tandem parking, this approach should not be applied to parking spaces in front of garages.	<b>Response to comments</b> Noted. Tandem parking within curtilage is acceptable.	<b>Summary of proposed action</b> Clarify wording on 3.4.22
P60/61 C3 Bovis believes developers should be free to negotiate lower provisions in certain circumstances (built up areas/good transport links exist). Increased parking stds impact on developer densities. ECC policy to accommodate larger cars is at odds with government policy which urges greater ownership of small vehicles. Bovis believes ECC should not pander to the requirements of large car owners. Garages should be counted as spaces when within the curtilage. People should be encouraged to erect shed in gardens for storage rather than use garages.	Lower provision in some circumstances is possible. The change in standards has been justified by evidence. Garages must be of sufficient size to accommodate an average car and storage.	None
P.61 The caveat on flexibility in Town Centre locations is welcomed, however little or no parking is required in Town Centre locations and the CC is urged to re-assess its requirements to consider if they are necessary.	The revised standards allow flexibility with justification.	None
Minimum garage sizes - Bovis build FOGs (flats over garages), without flexibility to garage sizes, the cost of providing FOGs will rise, the opposite of governments aims. FOGs will have to be bigger and more expensive, the increased garage size has ramifications beyond parking.	Garages do not have to be provided. Undercroft parking could be considered.	None
<b>Direct Reference:</b> Retirement dwellings		
<b>Contact Name:</b> Peter Court	<b>Organisation:</b> Bovis Homes	<b>Reference:</b> 063
<b>Summary of comments</b> P.60/61 C3 Retirement dwelling standard of 1 per	<b>Response to comments</b> The Retirement standards remains as is unless	<b>Summary of proposed action</b> Amend the standard PTW for Retirement/Warden Controlled

<p>dwelling is high and lacks flexibility, 1 space per 2 dwellings is more reasonable. Local Authority should differentiate between schemes. Some developers provide little or no parking in town centre locations, appeals have been upheld. The requirement for PTW is questionable, very little evidence to show retirement development residents use PTW - suggest deleting this requirement</p>	<p>the developer can justify less is required. Residents are usually 55+ and could feasibly own a car. Powered Two Wheeler requirement for retirement developments will be exchanged for mobility scooter requirement.</p>	<p>Developments. The full powered two wheeler requirement is not necessary, there should still be some provision for staff, and also some provision made for secure and covered mobility scooter parking.</p>
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**Direct Reference:** Residential

**Contact Name:** Steve Rogers

**Organisation:** Castle Point Borough Council

**Reference:** 066

**Summary of comments**

**Response to comments**

**Summary of proposed action**

The reintroduction of minimum car parking standards for residential development, gauged on the size of the accommodation to be provided is also welcomed since this too reflects real life experience.

Noted

None

The recognition that a standard size garage is inadequate for an average sized modern vehicle is also timely and support is given for the new standard.

The recognition of the value of shared surfaces in new residential development is welcome.

The recognition of the importance of sustainable urban drainage systems to the provision of car parking areas is also supported and should be made clear in any final publication.

There was considerable support for the notion that visitor car parking spaces should be provided as the new standards suggest.

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**Direct Reference:** Residential

<b>Contact Name:</b> Paul Munson	<b>Organisation:</b> Braintree District Council	<b>Reference:</b> 067
<b>Summary of comments</b> Concern minimum residential standards will discourage high density development. Standards should be qualified to allow for exceptions.	<b>Response to comments</b> There are exceptions for developments in urban locations with good sustainable transport links.	<b>Summary of proposed action</b> None
No reference is made to developments visited. A list might go some way to explain the conclusions reached	Noted	List locations visited under 1.2 The need to review Parking Standards
<b>Direct Reference:</b> Residential		
<b>Contact Name:</b> Elizabeth Blyth	<b>Organisation:</b> Danbury Parish Council	<b>Reference:</b> 070
<b>Summary of comments</b> The Parish Council has looked particularly at the section of the document relating to residential parking design – section 3.4 - and is in agreement with the principles outlined in para 3.4.1. However, it believes that specifying a minimum size for a garage to count as a parking space (3.4.15) is unnecessary and that flexibility should be allowed.	<b>Response to comments</b> From the evidence gathered for the revised document (e.g. survey, car dimensions, etc.) it is clear garages need to be bigger if people are to use them to park a car.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Residential		
<b>Contact Name:</b> Michael Ovenden	<b>Organisation:</b> Uttlesford District Council	<b>Reference:</b> 072
<b>Summary of comments</b> Members of the committee felt that the draft standards are more realistic and should provide a tool to avoid some of the unfortunate results of developments that we have felt obliged to accept or been imposed on us at appeal in the past due to the use of maximum standards.	<b>Response to comments</b> The use of garages should not be discouraged.	<b>Summary of proposed action</b> None
To avoid garages being used for storage, cart lodges should be required, rather than enclosed garages, or disregard garages entirely, whatever their dimension.		



<b>Direct Reference: Residential</b>		
<b>Contact Name:</b> Paul Ryley	<b>Organisation:</b>	<b>Reference:</b> 076
<b>Summary of comments</b> The document appears to be very comprehensive.	<b>Response to comments</b> Noted	<b>Summary of proposed action</b> None
<p>Currently main roads are too small and parking on street creates blockages for emergency vehicles/refuse collection.</p> <p>A minimum garage size should be specified and ensure main roads with parking are widened or parking is prohibited and enforced.</p> <p>Commercial vehicles/caravans should be excluded and written into the deeds for each house. This should be enforced.</p>		
<b>Direct Reference: Residential</b>		
<b>Contact Name:</b> Stephen Bolter	<b>Organisation:</b>	<b>Reference:</b> 077
<b>Summary of comments</b> P.11 2.2.2 There needs to be an exemption to the principle that “They should be designed with adequate lighting...so that people feel comfortable using them, especially after dark.” for dark villages. What is adequate and what makes “people” comfortable are variables which are hard to define. However the absence of any protection for dark villages could lead to developers forcing illuminated car parks into dark villages or open countryside.	<b>Response to comments</b> There is unlikely to be large scale development in dark villages. Lighting is dealt with by the Planning Authority who is likely to be sensitive to location.	<b>Summary of proposed action</b> None
<b>Direct Reference: Residential</b>		
<b>Contact Name:</b> Simon Vernon-Harcourt	<b>Organisation:</b> City & Country Group	<b>Reference:</b> 078
<b>Summary of comments</b> We think the guidelines, particularly in respect of minimum standards for residential are an excellent idea for the reasons you point out. The	<b>Response to comments</b> For locations with good links to sustainable transport, a lower provision of vehicle parking may be appropriate, on a case by case basis.	<b>Summary of proposed action</b> None

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only danger of minimum numbers of spaces requirements is that planning committees will use it as a reason to demand more spaces on a site to fulfil a local need, rather than the need of the actual site. In the way you have a preferred size for parking spaces, it would be useful to have a suggested number of spaces for urban, suburban and rural locations. We have done a number of developments in urban areas, where we sell 2 bed apartments with 1 space. The buyers know this when they buy the unit and adjust their lifestyle to suit - sell a car and buy a bike. In rural locations they certainly require more spaces. I know there have also been developments with NO parking, apart from car share schemes and bikes - how does this guide deal with this sort of development - it would be good to suggest that in some very well connected urban areas that less than 1 space / residential unit may be acceptable if alternative ways can be found to address the issue.

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**Direct Reference:** Pavement Parking

**Contact Name:** Ruth Stockdale

**Organisation:** RNIB

**Reference:** 073

**Summary of comments**

**Response to comments**

**Summary of proposed action**

Cars parking on pavements cause significant inconvenience and often danger for blind or partially sighted people who have to walk in busy roads to avoid cars.

Noted

Add enforcement paragraph after 2.2.6

We are pleased to see the parking standards consultation document and agree with the main aims of the document to increase parking spaces at new facilities to ensure that people have the space to park and therefore should not feel the need to park on, or block, pavements.

Parking restriction need enforcing.

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We would encourage Essex County Council to investigate existing parking provision and its implications of illegal parking on pavements or in restricted areas, making it impossible for blind and partially sighted people, people in wheelchairs, or people with buggies or pushchairs to safely use the pavements.

Finally, we would like to see Essex County Council consulting with its planning groups, and in particular the visual disability planning group during the next stage of consultation and development of the parking standards document.

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**Direct Reference:** Section 4

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**Contact Name:** Blaise Gammie

**Organisation:** School Organisation and Planning, ECC

**Reference:** 001

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**Summary of comments**

Need to make clear disabled spaces are included in overall vehicle figure, not additional to.

**Response to comments**

Section 4 provides a summary per use class. Section 4 should be read in conjunction with the rest of the document. Further detail of disabled parking provision is contained in 2.12 which clearly states "Disabled parking provision to be included in the overall vehicle parking standard" (2.12.2).

**Summary of proposed action**

None

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**Direct Reference:** Section 4

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**Contact Name:** Councillor K Ferguson

**Organisation:** Little Baddow Parish Council

**Reference:** 020

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**Summary of comments**

P.48, suggests Class A1, A3 and A4 should have a separate covered/uncovered formula. Showrooms (p.68) 1 space per 2 show cars for staff and customers, is this adequate? Service centres standard allows for steady flow of

**Response to comments**

The Parking Standard Review Group (consisting of representatives from district councils across the country) did not highlight that there were issues within these class uses.

**Summary of proposed action**

None

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vehicles throughout day, in practice most arrive in AM and picked up PM. Suggest doing spot check on existing to see.

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**Direct Reference:** Section 4

**Contact Name:** David Linnell

**Organisation:** Loughton Residents Association

**Reference:** 022

**Summary of comments**

P.48 S4 Unclear what difference would be in treatment of on-site parking between premises without near-by parking and one with parking nearby?

**Response to comments**

This would fall under the Shared Use Provision section

**Summary of proposed action**

None

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**Direct Reference:** Section 4

**Contact Name:** Laura Chase

**Organisation:** Colchester Borough Council

**Reference:** 024

**Summary of comments**

Require clarification on parking standards at restaurant/cafes ancillary to predominant use (e.g. garden centre)

**Response to comments**

This specific situation is unlikely to attract many people solely to a restaurant, therefore it is deemed too detailed to provide any further advice within the guidance.

**Summary of proposed action**

None

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**Direct Reference:** Section 4

**Contact Name:** John Pollard

**Organisation:** Chelmsford Borough Council

**Reference:** 037

**Summary of comments**

P.57 C2 Given that the circumstances at each hospital are different it makes sense to consider them on a case by case basis

**Response to comments**

Noted

**Summary of proposed action**

None

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**Direct Reference:** Section 4

**Contact Name:** Ian Bradley

**Organisation:** Great Waltham Parish Council

**Reference:** 039

**Summary of comments**

Section 4 – difficult to tell whether the maximum/minimum levels are practical, - they look okay generally but it is noted that a 2+ bedroom house has a min of 2 spaces, but this also applies to a 5 bedroom house.

**Response to comments**

Proposed Residential standards are a minimum, should developers wish to provide more spaces they can.

**Summary of proposed action**

None

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**Direct Reference:** Section 4

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<b>Contact Name:</b> Dr Allan Burns	<b>Organisation:</b> On behalf of self and McCarthy and Stone (Development) Ltd	<b>Reference:</b> 042
<b>Summary of comments</b> P.48 onwards: Where note states regarding lower provision, does this comment apply to all uses, e.g. vehicles, cycles, PTW? Is it necessary to require off-street servicing? This may prejudice the change of use or redevelopment of a town centre site, furthermore away from town centres on-street servicing may be acceptable depending on the nature of the road	<b>Response to comments</b> Noted, only a lower provision of vehicles in urban area with good sustainable transport links. Off street servicing, in line with guidance within the Urban Place Supplement can be provided via lay-bys in mixed street developments, but should only be used by small delivery vehicles providing they do not restrict the traffic flow. Delivery issues should be discussed and agreed with the Highway Authority (see page 66 of the UPS).	<b>Summary of proposed action</b> Amend wording from P48 onwards to read lower provision of vehicles, not all forms of use.
<b>Direct Reference:</b> Section 4		
<b>Contact Name:</b> Dr Allan Burns	<b>Organisation:</b> On behalf of self and McCarthy and Stone (Development) Ltd	<b>Reference:</b> 042
<b>Summary of comments</b> P.50 Is 1 lorry space per 2sqm correct for transport cafes?	<b>Response to comments</b> Yes	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Section 4		
<b>Contact Name:</b> Dr Allan Burns	<b>Organisation:</b> On behalf of self and McCarthy and Stone (Development) Ltd	<b>Reference:</b> 042
<b>Summary of comments</b> P.55 Is the vehicle parking standard for cars? Is there a standard for HGV's?	<b>Response to comments</b> HGV parking spaces would be based on operational requirement.	<b>Summary of proposed action</b> Add a paragraph to state that HGV parking quantities should be based on operational requirement.
<b>Direct Reference:</b> Section 4		
<b>Contact Name:</b> Shaun Scrutton	<b>Organisation:</b> Rochford District Council	<b>Reference:</b> 055
<b>Summary of comments</b> Section 4. Clarification of informative notes required, standards expressed as a maximum but notes state that a lower provision would be acceptable. If maximum = 1 then lower provision would be 0.	<b>Response to comments</b> Only a small number of developments would result in the maximum requirement of 1 parking space. The LPA should look at these situations on a case by case basis to determine provision.	<b>Summary of proposed action</b> None

<b>Direct Reference:</b> Commercial		
<b>Contact Name:</b> Pam Herbert	<b>Organisation:</b> Earls Colne Parish Council	<b>Reference:</b> 030
<b>Summary of comments</b> Shift working on industrial and commercial premises could create a need for additional spaces at shift change times	<b>Response to comments</b> It is national policy to encourage the use of sustainable modes of transport to access employment sites.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Education		
<b>Contact Name:</b> Jackie Lowe	<b>Organisation:</b> Construction Management Group, ECC	<b>Reference:</b> 026
<b>Summary of comments</b> There are separate cycle standards for crèche and day care, but primary and secondary school standards are the same. More secondary school pupils will cycle than primary. Suggest separating standards	<b>Response to comments</b> The standards were discussed and agreed with ECC Education department.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Education		
<b>Contact Name:</b> Jackie Lowe	<b>Organisation:</b> Construction Management Group, ECC	<b>Reference:</b> 026
<b>Summary of comments</b> Vehicle standards for schools are better but still not enough for rural areas	<b>Response to comments</b> The standards were discussed and agreed with ECC Education department.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Education		
<b>Contact Name:</b> Jackie Lowe	<b>Organisation:</b> Construction Management Group, ECC	<b>Reference:</b> 026
<b>Summary of comments</b> Primary and secondary school standards should be split. Secondary schools with 1200 pupils have 236 staff only 80 spaces, not enough	<b>Response to comments</b> The standards were discussed and agreed with ECC Education department.	<b>Summary of proposed action</b> None
<b>Direct Reference:</b> Education		
<b>Contact Name:</b> Jackie Lowe	<b>Organisation:</b> Construction Management Group, ECC	<b>Reference:</b> 026
<b>Summary of comments</b> Special schools require a separate paragraph, to	<b>Response to comments</b> Agree	<b>Summary of proposed action</b> Add paragraph to P.63

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be looked at on own merits

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**Direct Reference:** Education

**Contact Name:** Martin Brown

**Organisation:** Capital Programme and Building Development, ECC

**Reference:** 043

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**Summary of comments**

P.62 Standards for Crèche/day care are different than to schools, many nurseries are attached to schools and staff share car parks. Child care has low staff to pupil numbers, often there is only a morning operation, yet all part time staff are present at the same time. Experience shows that crèche staff often live close (within walking/cycling distance)

**Response to comments**

Noted

**Summary of proposed action**

Add paragraph to P.63 stating "Where a crèche is located at a school the parking standard for the crèche is added to the school element."

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**Direct Reference:** Education

**Contact Name:** Martin Brown

**Organisation:** Capital Programme and Building Development, ECC

**Reference:** 043

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**Summary of comments**

Would not want to see maximum provision for primary schools eroded as this puts pressure on surrounding roads. Document does not mention drop off/pick up points, this is supported as they require addition land, promote the use of the private car and demand would be impossible to accommodate.

**Response to comments**

Noted

**Summary of proposed action**

None

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**Direct Reference:** Education

**Contact Name:** Martin Brown

**Organisation:** Capital Programme and Building Development, ECC

**Reference:** 043

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**Summary of comments**

P.63 Cycling for schools, requirement is very high for both secondary and primary schools. Primary schools, only pupils who have passed their cycling proficiency badge are allowed to cycle, although the stands are also used for scooters (push). Propose to provide quantity that

**Response to comments**

Many Primary pupils will cycle with their parents and the bike will be left at school during the day. Pupils who have passed their cycling proficiency can cycle alone. Cycling should be encouraged as a sustainable mode of transport.

**Summary of proposed action**

None

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anticipates demand but allow space for cycle parking expansion (approx. 50% maybe)

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**Direct Reference:** Education

**Contact Name:** Martin Brown

**Organisation:** Capital Programme and Building Development, ECC

**Reference:** 043

**Summary of comments**

Special schools to be looked at on a case by case basis. Hope that coach parking can be accommodated within the car park to allow for a safe pick up /drop off area for organised school trips.

**Response to comments**

Noted

**Summary of proposed action**

Add a comment to P.63 regarding Special Schools

---

**Direct Reference:** Motor homes

**Contact Name:** Cllr Perry

**Organisation:** Saffron Walden Town and Uttlesford District Councillor

**Reference:** 071

**Summary of comments**

Europe recognises the need for motor homes and provides parking areas which promotes tourism, we do not.

**Response to comments**

Motor home parking is too specialised to demand its own standard.

**Summary of proposed action**

None

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**Direct Reference:** Large scale development

**Contact Name:** Peter Court

**Organisation:** Bovis Homes

**Reference:** 063

**Summary of comments**

P.21 2.14.1 Define 'large scale development'. For residential a specific number of dwellings should be stated as the threshold for a TA

**Response to comments**

Not appropriate for this document, thresholds for TA's can be found in TA guidance.

**Summary of proposed action**

None

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**Direct Reference:** Rural

**Contact Name:** Susan Rouse

**Organisation:** Ridgewell Parish Council

**Reference:** 025

**Summary of comments**

Document assumes a certain level of public transport and does not address rural situation

**Response to comments**

The document does not assume any level of public transport, but does acknowledge where sustainable transport links are good, a reduced standard could be justified, this is only likely to occur in urban areas.

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**Direct Reference:** Existing situation

**Contact Name:** R C Whittome

**Organisation:** Epping Town Council

**Reference:** 047

**Summary of comments**

Document is limited in scope and does not deal with many existing parking problems. The sustainability of ideas put forward may only be gauged by how well they facilitate a properly integrated transport strategy which is still not available.

**Response to comments**

Noted. The document is aimed at new developments, not existing.

**Summary of proposed action**

None

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