

Swale Parking Standards SPD

Consultation comments received during consultation period before 19th December 2019

Please note that the comments received from Tunstall Parish Council were received in July 2019. These comments were addressed as part of a previous iteration of the document and as such have not been addressed here.

No.	Comment	Response
1	<p>Bapchild Parish Council 02.12.2019</p> <p>We welcome this consultation to review car parking standards as residential on-street parking in our village streets is an ongoing problem both for safety and visual reasons.</p> <p>We support the more realistic approach to parking provision on new developments through consideration of local accessibility, public transport and the mix of housing. We agree with the statement that restricted parking provision does not necessarily discourage car ownership, it just creates problems for residents with indiscriminate on street and anti-social parking.</p> <p>We agree that parking spaces which are not well designed and convenient will not be used as intended in particular tandem parking spaces where usually only one of the spaces is used. As stated, the parking spaces need to be of sufficient size to accommodate the increase in car size.</p> <p>Variation in the materials used for parking areas is important as this provides a clear visual marker for the safety of pedestrians and cyclists.</p> <p>We support the need for infrastructure for electric vehicle charging points both at individual properties and communal parking areas.</p>	<p>Supportive of the SPD – no changes requested.</p>

<p>2</p>	<p>Bobbing Parish Council 17.07.2019 At this month's meeting of Bobbing Parish Council, Members made the following comments relating to the draft: Parish Councillors felt it does not really improve problems with parking that exist within the Borough; there is insufficient parking for properties and Members believe it should be one space per bedroom and for a flat two spaces per property.</p>	<p>It is noted that the SPD gives consideration to parking within new developments; it does not address existing parking stress within the Borough.</p> <p>The provision of one parking space per bedroom in residential developments is not considered to be justified by the evidence of need presented in the SPD or by planning policy objectives.</p>
<p>3</p>	<p>Carol Jacobs 07.11.2019 It seems very comprehensive for most use of vehicles, but nowhere do I see mention of car parking spaces designed for car users with young children. It can be a real lottery to find parking spaces that allow for opening car doors wide enough to get children and babies in and out of car seats and to transfer them into prams and buggies.</p>	<p>Reference is made to the need for parent and child parking at retail facilities. A note has been added to Appendix D of the SPD which states that consideration should be given to the need for parent and child parking on a case-by-case basis.</p>
<p>4</p>	<p>Elaine Turner 11.11.2019 Much of the document I agree with, but think that 1 parking space per bedroom in residential developments is the minimum that should be required. Many dwellings house 2 adults in each bedroom. As a delivery driver I am frustrated by the lack of short term parking in new residential developments and the need for residents to park on pavements.</p>	<p>Reference made to one space per bedroom – please see response to Bobbing Parish Council comment above.</p> <p>Short-term parking for visitors is proposed at a rate of 0.2 spaces per dwelling in all areas outside of town centres. Further consideration has been given to flexible/opportunity parking to address other consultation responses.</p>
<p>5</p>	<p>Faversham Town Council 10.12.2019 Swale Borough Council's Draft Car Parking Standards Supplementary Planning Document The Planning Committee discussed the document and agreed: Recommendation: Support. Comment: The consultation document is very comprehensive. It provides clear guidelines for</p>	<p>Supportive of the SPD – no changes requested.</p>

	<p>developers and public space car parking providers. It also includes a useful statement of the provision of electric charging points.</p> <p>This document is a useful guide for both Councillors and Officers.</p> <p>The committee concluded that the document should be regularly updated as technological advances are made in vehicle design.</p>	
6	<p>Highways England 17.12.2019</p> <ol style="list-style-type: none"> 1. General - We welcome the approach taken and the wish to provide up-to-date guidance on parking standards, but also regarding parking layout and design to ensure that it is not simply a "numbers game" nor an afterthought. 2. General - Given that the only part of the SRN within the borough is the A2(west), a dual carriageway with grade separated junctions and no general frontage development, we have no comments on the general content of the SPD. Elsewhere on the SRN, where it comprises A roads through villages etc, we would comment as appropriate. 3. General - The application of the standards should always carefully balance the aspiration to manage down traffic generation/ attraction as part of the local sustainable transport strategy, while ensuring that the provision is realistic in order to avoid inappropriate/anti-social parking beyond the site. This can be an important consideration for us, since it may affect the efficient operation of the local 	<p>With regard to each of the points raised, we would respond as follows:-</p> <ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. Noted. 4. Noted – information regarding potential conditions has been included in the SPD in relation to mixed use developments. 5. Travel Plans and Parking Management Plans will be monitored by Swale Borough Council (SBC) to ensure that they are suitably enforced. 6. Providing on-site parking is sufficient and consideration has been given the circulation of the vehicle parking, it is considered that Event Management Plans (EMPs) are unlikely to be required in the majority of cases. For larger schemes, proposing large-scale events, due consideration of EMPs should be considered on a case-by-case basis. 7. For non-residential developments, goods vehicle parking has been considered within the notes to Appendix D. For lorry parks, planning applications should be supported by a robust Transport Assessment which justifies the proposed level of parking. As such, no dedicated standard has been provided within the SPD.

<p>network and, in turn, the safety and effective operation of the SRN.</p> <p>4. Para 89 – We support the use of “worse case” analysis and provision where the land use is likely to comprise a mix of uses, especially where those uses can have very different traffic generation/ attraction characteristics. In assessing parking standards and provision, the council should be mindful of the changing worker floorspace standards. For example, hot desking in B1 or parcel delivery in B8 have resulted in very different demand for parking for staff or deliveries. It may be necessary to condition the land use in order to avoid future occupation leading to traffic or parking issues.</p> <p>5. Paras 91/92 – We support the use of Travel Plans and Parking Management Plans provided that they have sufficient “teeth” to ensure appropriate levels of monitoring and timely action if required to deal with any issues.</p> <p>6. Paras 91/92 – It may also be necessary to impose conditions regarding the production and use of Event Management Plans, especially at sites attracting large numbers of vehicles that arrive and/or leave within a narrow timeframe, thereby having a significant impact on the local and/or strategic road networks. At their simplest EMP contain details of how small, medium and large (whatever that means for the particular site) events will be managed. We would be particularly concerned to ensure that parking layouts allow for and the management of them facilitates bringing vehicles deep into the site to then park them,</p>	<p>8. A note has been added to Table 3 regarding non-residential standards.</p> <p>9. A note has been added to the B8 use class in Appendix D.</p>
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	<p>rather than having long queues at the entrance that could block the local and/or nearby strategic networks. Therefore the SPD may benefit from additional text to reflect our concerns.</p> <p>7. Section 3 – omission – NPPF para 107 states the need to ... <i>recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.</i> Given the high demand for lorry parking across Kent generally, we suggest that the SPD should include specific guidance on the standards, design and layout for lorry parks as well as general parking of lorries on site.</p> <p>8. Section 4 – Given the rapid advancement of battery technology and rise of “last mile” delivery, we suggest it would be timely to introduce standards/ guidance regarding the provision of charging points for commercial and larger vehicles.</p> <p>9. Appendix C – Modern parcel delivery companies have very different traffic generation characteristics compared to traditional B8 warehousing & distribution/ wholesale trade distribution. Anecdotal evidence suggests in the order of perhaps 6 times the trip generation and hence a far higher level of parking required. Research on this area continues. In the meantime, we therefore request that a note be added to the table for B8 stating that the parking provision in connection with applications</p>	
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	for parcel delivery type land uses will be considered on their own merits.	
7	<p>Historic England 18.12.2019 Historic England has no specific comments to make on the above document which deals with matters beyond its remit and area of competence.</p>	No specific comments provided.
8	<p>Dana Wiffen 18.11.2019</p> <ol style="list-style-type: none"> 1) When giving permission for new properties ensure there is enough parking for the number of properties being built. 2) When bringing in restrictions or charges especially in streets near to stations remember that the poor commuter has a tough time, and while many will drive from home and want to park near to stations that will not be able to afford Network Rails daily charges, so if you have to bring in charges keep them reasonable. 3) Finally in narrow roads bring in scheme that allows parking on alternative side of the roads that are long to prevent the constant double parking that can prevent emergency vehicles getting through. 	<p>With regard to each of the points raised, we would respond as follows:-</p> <ol style="list-style-type: none"> 1. Noted. 2. Parking restrictions are dealt with via Traffic Regulation Orders (TROs). No changes made. 3. The SPD is concerned with new developments rather than existing conditions. No changes made.
9	<p>Mrs J Bengall 12.11.2019 Summarised as:-</p> <ol style="list-style-type: none"> 1. Disputed the findings of the changes in young people's travel behaviour and the 'baby boomers' due to the congestion on the road network. Noted that steps should be taken to mitigate the traffic congestion on all developments; 2. Parking restrictions for all new developments should be much more robust, with three spaces 	<p>With regard to each of the points raised, we would respond as follows:-</p> <ol style="list-style-type: none"> 1. This comment relates to congestion. No changes made. 2. The parking provision detailed in Appendix A is considered suitable. On-site parking restrictions are subject to TROs. They are often recommended through the planning process; however, TROs are subject to their own application and approval procedure. No changes made. 3. Garages and car ports are considered within the SPD. 4. The pricing of town centre parking is not within the scope of the SPD.

	<p>provided for all new homes. Double yellow line restrictions should be placed on all estates;</p> <p>3. Noted the comment regarding garages and their lesser use for parking. Queried the need to build houses with garages at all;</p> <p>4. Town centre parking should be free; and</p> <p>5. Provision of cycle parking is commendable but commented that there was limited cycle infrastructure within the borough.</p>	<p>5. Cycle infrastructure within the Borough is not within the scope of the SPD.</p>
10	<p>Persimmon Homes 18.12.2019 Summarised as:- Persimmon do not support the provision of 0.2 visitor spaces in edge of centre developments.</p>	<p>Note 1 has been applied to each of the standards, highlighting the need for flexibility in their application. It is considered that this suitably addresses the concerns raised regarding visitor parking.</p>
11	<p>Stephen Palmer 17.11.2019 With regards to the standards I would like to comment about the size of parking bays and believe that they are too small when taking into account the types of vehicles in Swale. As a lot of Swale is rural people tend to drive larger or 4 x 4 cars and a lot of these are almost 5m long, which is within the proposed recommendation. However the width of the car tends to be 2m and therefore there is little room to open the door and exit the car. What is not taken into account is the actual depth of a car door. My car door has a large depth of about 150mm and it is also 2m wide, so if I park in the middle of a 2.5m bay both my passenger and myself only have 350mm in which to exit the car. Therefore I would recommend that a minimum width should be 2.6m or even 2.7m and wider if the space is against a hard standing.</p>	<p>Vehicle parking dimensions for a number of scenarios are considered within the SPD to ensure the practicalities of accessing bays are taken account of. As such, no changes have been made.</p>
12	<p>Footpaths Group 19.11.2019</p>	<p>No changes requested.</p>

	<p>I imagine that the vast majority of existing and proposed parking sites are not crossed by or bordered by Public Rights of Way (PROWs), but I would like to make two brief points.</p> <p>As with all planning proposals, any ones to create new such sites should be checked to see if any PROWs would be affected.</p> <p>Paragraph 143 ("Car parks should be designed to provide good quality pedestrian routes to minimise conflict...") is very welcome, though clearly effective enforcement would be needed to ensure that such routes are not obstructed by or driven across by vehicles.</p>	
13	<p>Sittingbourne Society 15.11.2019</p> <p>The Sittingbourne Society has considered the draft Car Parking Standards which the Council has recently published and is generally content with what is being proposed. We hope the Council insist on their being applied in future planning applications in the Borough.</p>	No changes requested.

Duchy of Cornwall Comments (please note the “No.” column relates to the paragraph number of the comments provided)

No.	Comment	Response
3	The need for flexibility	Throughout the document, the need for flexibility in how the standards are applied has been emphasised.
16	The emerging future: Namely electrification of vehicles, as well as the concept of ‘Mobility as a Service’	Additional paragraphs have been added regarding Mobility as a Service and the emerging trends with regard to home working. Please see Paragraphs 10 and 11.
27	Reinforcing flexibility: Para 10, 57, Appendix A footnote 1 – There is some reference to making cases for alternative levels of provision. As described in earlier within this consultation response, it would be helpful if this can be both reinforced and broadened in the introduction and throughout the report. The nature of the justification for alternative provision shouldn’t be constrained, it should be developed on a case by case basis. This should allow for both reduced car parking demand and increased efficiency in the use of car parking. If the types of case which would be considered aren’t removed, then there should be some recognition that allocation, management and land use mix can influence the need for car parking spaces.	As noted above, this has been provided throughout the document.
28	Car ownership by type and tenure: Table 1 – It could be helpful to also provide some information on how car ownership varies by tenure and type of dwelling, similar to the data presented in Table 1 of this consultation response. This could then be used to inform the kinds of flexible approaches to	The table provided by the Duchy of Cornwall has been included within the SPD. Please see Table 2.

	accommodating demand that this consultation response is promoting.	
29	<p>Visibility: Para 46 – It would be helpful to reword this paragraph on visibility splays as, while the sentiment is correct, it could be read to exclude clear stem trees from visibility splays. This paragraph should better reflect the intent in within Manual for Streets – that the impact on the overall visibility splay needs to be considered.</p>	This paragraph has been updated following discussions with Swale Officers and reference to visibility is no longer provided.
30	<p>Car Clubs: Para 57 – Car clubs are becoming increasing viable propositions outside of major metropolitan areas, particularly among a younger demographic. Car clubs have significant potential to reduce the demand for car ownership, particularly reducing the demand for owning a second or third car. A greater emphasis could be made on car clubs for all urban locations. This also has benefits for existing nearby residents and therefore has wider district wide transport strategy effects.</p>	A dedicated section on Car Clubs has been provided – please see Paragraphs 74 to 76.
31	<p>Car Barns: Para 58-68 – the use of car ports generally was welcomed during the consultation discussion session and there may be some benefit in emphasising this, or splitting them from garages. In particular, it is important to remove PD rights and to make infilling difficult.</p>	The section for Car Barns, Car Ports and Garages has been separated, with additional detail provided regarding car barns and car ports. Additional images have been added to highlight different design options. Please see Paragraphs 50 to 59.

32	<p>Garages and EVs: Para 61 – Connected with Chapter 4, it would be helpful here to further emphasise how providing electric car charging points within garages can help to increase the usage of garages over time as the vehicle fleet becomes electrified. This therefore reduces parking on, and generally enhances, the street.</p>	<p>Garages tend to be provided with electric provision as standard on new developments to allow for greater usability. However, it is unclear as to whether the provision of electrical charging facilities within garages will translate to their use for parking, when vehicles can still easily be charged on driveways using the electrical supply from the garage. Evidence from Space to Park highlights limited garage use generally. As such, the commentary regarding garages remains unchanged.</p>
33	<p>Garages: Para 62 – The SPD as drafted draws some over generalised conclusions on garage usage. It could be true in some circumstances that garages are utilised less well than other forms of parking, but they are not unused. A level of usage should be able to be accounted for. Tendencies for under use is also a reflection of the sizes of garages from a point in time. This standard seeks to increase garage size which should increase their use and thereby increase the degree to which they are counted as parking – perhaps to 100%.</p>	<p>As above, the commentary regarding garages remains unchanged.</p>
34	<p>DDA compliance: Para 64 – the Disability Discrimination Act was withdrawn in 2010 and superseded by the Equalities Act. All references to DDA should be removed. This particular paragraph does not require any reference to the Equalities Act as it should be adequate to refer to part M of the building regulations which sets out the appropriate requirements. This document does not need to duplicate or change that requirement and it could just reference it to allow for any future changes.</p>	<p>Reference to this has been removed from the document.</p>

35	<p>Mews and Courtyards: Para 69-72 – It would be helpful to expand this section, or to add a separate section, on how Mews and courtyards with multiple points of entry and exit and internal dwellings can create a sense of security and a level of activity which substantially increases the attractiveness of such spaces. It would be helpful to show how such an approach can work successfully.</p>	A section has been added covering these layouts – please see Paragraphs 63 to 67.
36	<p>Driveways: Para 76-78 – It may be helpful to provide some advice on how driveways and frontage parking can be done well, such as aiming for small groups of spaces together with integrated landscaping and direct pathways to front doors.</p>	Reference in the ‘Driveways’ section has been made to the guidance provided in the ‘Public Realm’ section to avoid repetition. Reference to footway provision to dwellings has been provided in Paragraph 70.
37	<p>Mixed use developments: Para 89 – Using a worst case where a single building is being considered in isolation may be reasonable, but it is not reasonable to take such an approach where a number of units in a cluster (local centre say) is proposed, all of which have a flexible use class. The parking standards should be applied as a reasonable/realistic case, not a worst case. Having 10 units all with open A1-A4 use class would not result in 10 cafes, or 10 convenience stores; it would be a mix.</p>	Reference to the ‘worst case’ provision has been maintained. In planning terms, if a flexible provision has been applied for (e.g. B1/B2/B8), it will depend on market demand for such uses at the time as to which ultimately inhabit the site. Whilst it is acknowledged that retail use classes are more likely to display a mix, as highlighted, any deviations from the standards should be supported with evidence and a Parking Management Plan if necessary. It is considered that the ‘Mixed Use’ section of the SPD covers the needs of these developments in detail, ensuring flexibility is applied where necessary.
38	<p>Inclusive Mobility: Para 117 – Part M of the building regulations is perhaps the more relevant reference, rather than Inclusive Mobility.</p>	This has been updated to reference Part M of the Building Regulations.

39/40	<p>Parallel parking bays:</p> <p>Para 123 – The additional width for a parallel blue badge bay is generally only required where the bay sits parallel to a road with a high speed or a high flow. In all other circumstances, a standard width bay (2.0m wide) is adequate as those entering or exiting the vehicle can use the carriageway. This is similar to an end on bay where the 'rear hatch' can protrude into a carriageway rather than being in addition to it.</p> <p>Para 123 – The additional length for a parallel blue badge bay is generally only required where the bay sits in isolation of other bays. In all other circumstances, a standard length bay (6.0m long) is adequate as those entering or exiting the vehicle can use space between parked cars. Where 6.0m bays are marked out, the space between parked cars is c.1.2m – which a large car requires to manoeuvre into and out of the space. This is similar to an end on bay where the 'side hatch' can be shared with adjacent spaces rather than being in addition to it.</p>	<p>Upon further review of disabled parking guidance, reference has been found to minimum parallel parking bay dimensions of 6.6m and 2.7m, which are recommended by the British Parking Association. As such, these dimensions have been referenced in Paragraph 115.</p>
41	<p>Disabled Parking:</p> <p>Para 124 – The size of an end-on blue badge bays should be as defined in Part M of the building regulations.</p>	<p>The recommended length of disabled parking bays has been increased from 5.5m to 6.0m to accord with Part M of the Building Regulations. Please see Paragraph 116.</p>
42	<p>Mobility aid parking:</p> <p>Para 128 and Table 4 – Mobility scooters are likely to become an increasing issue in new developments in the context of an aging population. However, there is no evidence in the SPD to justify the standard set out</p>	<p>The standard has been removed and replaced with a note which states that the need for and quantum of mobility aid parking should be considered on a case-by-case basis. Please see Paragraph 120.</p>

	<p>in Table 4. The justification for this standard should be set out or a specific standard should be removed with this being secured as 'to be assessed on a case by case basis' to allow for future research to inform an appropriate level.</p>	
43	<p>Motorcycle parking: Table 5 – There is some evidence that would support a rate of some 5% of parked vehicles being motorcycles. However, it is not necessarily appropriate to require this level of parking provision as motorcyclists can park within the supply of car parking spaces, which provides a more flexible supply. If some spaces were to be dedicated to motorcyclists, then the car parking supply should be reduced by the same amount.</p>	<p>Overall, motorcycles require significantly less space when compared with a car. The standard is considered to be suitable and ensures there is a dedicated space for motorcycles without the need for motorcycles to park in a vehicle space.</p>
44	<p>Parking dimensions: Table 6 – There is some question as to the logic behind some of the dimensions set out in this table. For example:</p> <ul style="list-style-type: none"> • a 'disabled car space' should reflect Part M • why is 'car port/car barn - two cars' more than twice the width of 'car port/car barn - one car' • In footnote 1, why would every car parking space require a 0.5m setback from a parking space to a footway or carriageway as a default – there may be some circumstances where this is appropriate, but there will be others where it is not (unallocated car parking areas for example) 	<p>These have been updated to reflect the comments provided. Please see Table 7. The 0.5m setback has been updated and reference is now made for where spaces abut carriageways only. Consideration of service margins is required for highway adoption. More details can be found in the Kent Design Guide.</p>

45	<p>Motorcycle bay sizing: Table 7 – footnote 1 – what is the rationale for requiring a 1.0m spacing between each motorcycle bay – there is no clear reason behind this and does not appear to be necessary as the space itself includes adequate access space.</p>	Reference to the 1.0m spacing has been removed, following a review of the effective width of motorcycles, which is normally up to 1.0m (inclusive of handlebars).
46	<p>Bays in front of structures: Page 33 bottom right hand figure – What is the rationale for spaces being 6.0m long where they are in front of a structure? This does not appear to be necessary in the majority of cases, and indeed is contrary to common practice. This is an inefficient use of space.</p>	The diagrams which reference the 6.0m length have been revised to specify a 5.0m length.
47	<p>Flexibility: Appendix A – This page should reinforce the flexibility in the interpretation of standards and the case by case approach as many readers will only review this page.</p>	A section at the beginning of Appendix A has been added. Guidance on allocation has also been added.
48	<p>Visitor parking: Appendix A – Visitor parking at 0.2 is reasonable but this also, and without any additional provision, forms part of the wider supply for residents. This is an example of how a combination of allocated and unallocated parking can reduce the overall need for parking.</p>	This comment is noted.
49	<p>Recommended standard: Appendix A – The table introduces flexibility through ranges such as '1 to 2'. However, the table states 'minimum' in which case the value should be the</p>	This comment regarding parking numbers has been accommodated. To allow for the range in parking to be provided, the term 'Recommended' has been utilised.

	<p>single lower value (1 in this example). If the table were to be amended to set a 'recommended' level of provision then a range is sensible.</p>	
50	<p>Parking numbers: Appendix A – A minimum of 3+ spaces per 4 bed dwelling does not allow sufficient flexibility given the proportion of 4 bed dwellings which are likely to own a third vehicle. Table 2 of this consultation response shows that only a relatively modest fraction of 4 bed homes are likely to use a third space. This could be more effectively accommodated through a smaller number of opportunity parking places on-street.</p>	<p>Parking numbers have been maintained. However, a paragraph at the beginning of Appendix A has been added which gives notes that using unallocated parking can maximise flexibility.</p>
51	<p>Non-residential standards: Appendices C and D (now D and E) – These appear to be taken directly from the Kent and Medway SPG4 from 2006. Presumably these have not been updated. Given changes in travel behaviour and future trends it would be sensible to add some flexibility here.</p>	<p>These have been changed to 'Advisory' to allow for flexibility so that additional evidence can be brought forward to justify the parking levels proposed on a case-by-case basis.</p>