

Residential Design Guide

May 2018

Report of Public Consultation

Ref	Name	Company /Organisation	Comment	Response	Amendments to the document
14427	Sharon Jenkins	Natural England	Do not wish to comment	-	N/A
12146	Diane Clarke	Network Rail	No comments to make	-	N/A
14867	Katherine Geddes	Leamington Town Council	Support	-	N/A
201	Jenny Mason	Whitnash Town Council	No comment		N/A
14869	Colin Quinney	District Councillor - Leam Ward	The Guide is very well presented and a great deal of the design and detailed technical content is excellent and to be welcomed. However there are some important underlying principles which are open to question and should be reviewed, especially in the light of recent national/local policy changes and available research.		
14869	Colin Quinney	District Councillor - Leam Ward	SECTION 3 – POLICY FRAMEWORK Page 11 Garden Suburb Policy The new NPPF now out for consultation does not emphasise the Garden Suburb approach as implied in this draft. Its new focus is on best use of land through good design and higher densities.	Although the draft of the new NPPF does not include the garden suburb, towns and villages approach, a number of prominent bodies, including the RTPI have requested that the government include it in the final version. Because of this and the fact that the Local Plan has been based on such	None

				principles, it is considered that the reference should remain.	
14869	Colin Quinney	District Councillor - Leam Ward	<p>This section therefore may need considerable review and redrafting – or at least modification – to incorporate the following suggested changes to:</p> <p>a. raise the minimum density objective to 45- 50 dwellings per ha</p> <p>b. link this objective explicitly to sustainable transport objectives – in particular of accessible, frequent and affordable public (bus) services. Studies have shown that 50 + dwellings per ha is required.</p> <p>c. clearly state that the local Plan requirement for around 50% of demand for all dwellings, private and social, is for one and two bedroom properties</p> <p>d. encourage terraced and mid-rise apartment solutions – the latter seem to be discouraged in the draft - to achieve these density and smaller unit objectives. Give examples of attractive historic and recent buildings both terraced (e.g. Clapham Terrace) and 3/6 storey Regency/Victorian streets and modern developments (eg.....??) which meet these criteria.</p>	<p>Changes to the densities of dwellings in this document would be at odds with the Local Plan. This document does not succeed the Local Plan and should not seek to change adopted policy. This document is meant to add some guidance to the detail which the local plan hasn't provided.</p> <p>Advice on housing mix is being prepared which should address the issue of the type of housing required on new developments and also will refer to planning guidance and masterplans which are in preparation for specific sites/areas allocated within the Local Plan.</p>	None
14869	Colin Quinney	District Councillor - Leam Ward	<p>SECTION 4 –DESIGN STEPS Page 19 BE2</p> <p>c) Minimum density objective should be revised to 45-50 dwellings per ha</p> <p>e & h) Transport modes should be clearly placed in descending priority order -</p>	This would be changing Local Plan policy	None

			walking, cycling, buses...with cars last of all.		
14869	Colin Quinney	District Councillor - Leam Ward	SECTION 4 –DESIGN STEPS Page 19 BE1 p) The minimum energy efficiency rating required could be stated in this section.	These are included in the Local Plan and do not therefore need to be repeated here as this document should be read in conjunction with the Local Plan and its relevant policies. Building Regulations include much of this information now	None
14869	Colin Quinney	District Councillor - Leam Ward	SECTION 5 –DESIGN CONSIDERATIONS Page 24 – Densities As stated in comments on Section 3, densities should be set at a minimum of 45-50 per ha in the 'garden suburb' areas and at higher densities near to Town Centres and public transport interchanges. Rationale is given in Section 3 and footnotes 1,2 and 3 Modify the discussion of exceptions to the density policy to underline the requirement to meet small unit and affordable housing policies, as well as better land use; and state that only rare exceptions will be made.	This would be changing Local Plan policy. There is an argument to be made in specific circumstances for lower densities. However, the expectation is that density minimums are in line with the direction of travel of the draft NPPF	None
14869	Colin Quinney	District Councillor - Leam Ward	Page 25 – Amenity Space Clarify if the minimum amenity spaces specified include or exclude off-street parking spaces (should surely exclude?) Encourage use of balconies/convertible to conservatories for flats, to provide private amenity space.	The minimum amenity space standards exclude parking spaces. Balconies bring their own inherent issues of overlooking and loss of privacy and	None

				therefore they are not actively advocated	
14869	Colin Quinney	District Councillor - Leam Ward	<p>SECTION 6 – DESIGN PRACTICALITIES</p> <p>Page 30 – Quality environments. This is a golden opportunity for this SPD to introduce minimum space standards as laid out by both DCLG in 2015 and by RIBA’s similar case for space in 2011. Independent local research shows clearly that up to 75% of houses are being built below these minimum standards.</p> <p>Experience suggests that local professionals would welcome minimum standards being set. Purchasers would be protected and developers encouraged to on design and quality. Have architects and other professional been consulted?</p> <p>By introducing minimum space standards alongside higher minimum densities, this SPD could achieve a win-win for residents and developers with no uplift in property prices.</p>	As set out in the Government’s “Housing: Optional Technical Standards Guidance” - Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans. This is not something that can be done as part of a review of the Residential Design Guide SPD	None
14869	Colin Quinney	District Councillor - Leam Ward	<p>Page 30 – Energy conservation</p> <p>Is there an opportunity to revise upwards the minimum energy efficiency requirements set out in the Local Plan – given its long gestation, recent national policy guidance and the local Administration’s declared intention to stimulate eco-friendly housing?</p> <p>A requirement to incorporate solar</p>	The direction from Government has been to direct energy efficiency of buildings to Building Regulations hence why we no longer have a Sustainable Buildings SPD. We can’t ask more than Building Regulations standards	None

			panels/tiles into all new developments 'where appropriate' might be a sensible specific adjustment to add.		
14869	Colin Quinney	District Councillor - Leam Ward	<p>Page 31 Policy H4 Is it appropriate that a 'viability exception' to this policy should be explicitly made, given that the approved Plan has assessed viability as part of the overall process and the Inspector has agreed?</p> <p>If it is appropriate, then it may be considered good practice to set a minimum % for affordable housing as other authorities do. Perhaps at 30%.</p> <p>It should also be pointed out here or elsewhere in the document that viability assessments and their evaluation will generally be made public (as confirmed by the recent decision over Riverside House/Covent Garden developments).</p>	The SPD is written to support the Local Plan policies. It cannot change the standards adopted in the Local Plan. The RDG simply reiterates the exception which is already explicitly set out in Policy H4 in the Local Plan	None
14869	Colin Quinney	District Councillor - Leam Ward	Affordable housing should be clearly defined here as per our Local Plan; 40% split 24% at social rents, 10% at 'affordable' rents and 4% as shared ownership. This needs to be explicit, to avoid confusion with the NPPF looser definition currently out for consultation.	The Local Plan has set the minimum density at 40%. This document cannot change Local Plan policy.	None
14869	Colin Quinney	District Councillor - Leam Ward	SECTION 10 THE WAY FORWARD Pre-application advice Page 62 it should be stated that all pre-	Documents supporting planning applications are made public	None

			application advice given will normally be publicly available when each application is validated and uploaded on to the planning portal for public consultation.	unless there is a specific reason not to do so, such as market sensitivity/confidentiality. It is a national requirement and can only be sought in the following circumstances (as set out in the DMPO 2015): Development defined as 'major development' Development in a designated area2 consisting of: o The provision of one or more dwellings o The provision of buildings where the floorspace created is 100sq m or more What they should contain is set out in national guidance and we are not able to add local requirements to this	
14870	Nicola Overall	Rowington Parish Council	1. Parish and Town Councils are the tier of local government that are closest to the community that they serve and are best placed to comment on planning proposals within their locality. There is no mention of the role or importance of Parish or Town Councils in relation to planning decisions in this document. This must be corrected, and the views of the relevant Parish or Town Council identified as a significant factor in any planning decision.	The document is not outlining the process of submitting a planning application. It is dealing with matters of residential design. There is no need therefore to outline the planning application administrative process	None
14870	Nicola Overall	Rowington Parish Council	2. The Residential Design Guide V8 focusses almost exclusively on the urban environment. There is no mention of the	Design principles in this document can be applied throughout the district. For	None

			need to consider the relevant Village or Parish Design Statement when building in a rural setting. This is a significant oversight which limits the utility of the guidance and should be corrected in any final version.	more detailed advice on a more local level, parish councils and others are encouraged to work toward producing a Neighbourhood Plan in which they can outline the specific characteristics of their area and offer advice on how these can be repeated and enhanced to add to the existing styles, materials, designs and densities to further improve the area whilst retaining the historic character and setting of villages and hamlets	
14870	Nicola Overall	Rowington Parish Council	3. As a Parish Council, Rowington has suffered from planning decisions that fail to take account of the unique nature of the rural environment such as widely spaced housing and the historic architectural styles present in many villages and hamlets. Guidance on planning density and design that is suitable in an urban setting will often be completely inappropriate in a rural environment. The guidance must reflect the need to take account of the views of Parish Councils when determining planning decisions in a rural environment.	Design principles in this document can be applied throughout the district. For more detailed advice on a more local level, parish councils and others are encouraged to work toward producing a Neighbourhood Plan in which they can outline the specific characteristics of their area and offer advice on how these can be repeated and enhanced to add to the existing styles, materials, designs and densities to further improve the area whilst retaining the historic character and setting of villages and hamlets	None
14870	Nicola	Rowington	4. Rowington Parish Council welcomes the	A new planning 'local validation	None

	Everall	Parish Council	requirement to submit a Design and Access Statement but note that the proposed guidance give less protection than the current 2008 guidance as far as rural villages and conservation areas are concerned, particularly with regard to density and design. The reference to Garden City principles should be removed as this no longer appears in the current draft National Planning Policy Framework. The Parish Council also suggests that a simplified, but mandatory form of Design and Access Statement is required for all planning applications. The length and complexity of the current proposed guidance means that much of the guidance will be ignored in practice.	list' is being prepared by the development management team. The requirement to submit a design and access statement and what it should contain is being addressed through this work.	
14870	Nicola Everall	Rowington Parish Council	5. The Parish Council is concerned at the reference to "innovative designs where they complement their surroundings and stipulates that buildings, which make a statement may be appropriate in an otherwise uninteresting street scene or on corner sites". This type of design will often be inappropriate in a rural setting and reinforces the need to take account of the views of Parish and Town Councils when planning decisions are made.	Decisions are made on a site by site basis. Whilst there may be situations and designs which do not suit a particular location, there are others where it will. This is not specific to urban and rural locations. Parish and Town councils are consulted on all such developments and their views are taken into account when a decision is made.	None
9602	Jasbir Kaur	Warwickshire County Council	The Highway Authority considers that this document has the potential to provide a clear highway structure for new developments. The Highway Authority would welcome a	This is not a subject for this document. As the Highway Authority, WCC has responsibility for highway	None

			<p>dedicated chapter which would set out the provision for highways and standard requirements for new residential developments. This would also include requirements for access arrangements. The chapter could also include information on the provision of infrastructure for sustainable modes of transport, including cycle infrastructure, bus stops and shelters and public rights of way with points of contact included for the County Council.</p> <p>In addition the Highway Authority actively promotes walking neighbourhoods, and the RTPi Guidance on Dementia and Town Planning, most notably the need for legible and well connected neighbourhoods and developments, which use techniques including landmark buildings, landmark trees and changes in vegetation and materials to guide people through a development, but also make distinct areas which people can recognise.</p>	<p>design, not the district council. If it is considered necessary to publish this information, WCC should do this and the district council could adopt those standards. Otherwise, the district council will continue to consult with the highways authority when developers design new schemes for comment in pre-application discussions or when planning applications are submitted</p>	
14069	Neil Eaton	Kenilworth Town Council	<p>There appears to be a contradiction between Fig 5 and Fig 6 top right. It was felt that the extended roof should be hipped in both cases</p>	<p>Will change the diagrams to make it clear. One has been inadvertently included twice.</p>	<p>Repeated diagram fig 5 removed</p>
14069	Neil Eaton	Kenilworth Town Council	<p>Welcomes the introduction of amenity space standards for houses and flats. The Town Council is not clear whether this will apply to the effect of extensions in gardens?</p>	<p>It would be a material planning consideration. Applications for extensions have been refused where it was considered that the dwelling would not be left with sufficient amenity space, however, having standards puts us in a stronger position to do</p>	<p>None</p>

				this.	
14069	Neil Eaton	Kenilworth Town Council	Questions the requirements in Fig 21 as possibly irrelevant as Permitted Development rights surely exceed them?	Dormers are not permitted development in Conservation Areas	None
14069	Neil Eaton	Kenilworth Town Council	Suggests that the Photo examples would be much more use if it clearly indicated which are considered Good examples and which Bad, possibly by the use of ticks and crosses as earlier in the Guide	The majority of the photos show illustrate good practice, it is therefore considered that an X could be shown against those few photos that demonstrate bad practice. Read with the text accompanying the photos, this should make it clear	X added to Photos Illustrating Poor design

Residential Design Guide

May 2018

Report of Public Consultation Parking Standards

Ref	Name	Company /Organisation	Comment	Response	Amendments to the document
71140	Ed Pigott	Barton Wilmore	The draft standards do not make clear whether the parking provision should be rounded up or down to the nearest whole number, this should be explicit.	Parking provision should be rounded up to the nearest whole number where appropriate. This is explicit for HMOs in Table 1, though it is acknowledged that this could be made more explicit elsewhere, most notably for the total spaces on major sites incorporating unallocated parking which is calculated as a percentage of the total number of allocated spaces.	P8 – identify that that the number of spaces should be rounded up to the nearest whole number where appropriate.
71140	Ed Pigott	Barton Wilmore	The draft parking standards in some circumstances would significantly increase the level of parking required within development when viewed against the adopted standards. In the example set out above, the parking standards requirement increase from 150.5 spaces to 200.4 spaces (33.2% increase). The requirement will increase further as the	The draft SPD deliberately aims to increase the level of residential parking for the reasons set out in the introduction and the accompanying evidence paper. This is most notably to be less	N/A

			size of the development increases. The justification for such an increase is a general increase in car ownership between 2001 and 2011 censuses which doesn't adequately take into account the spatial variation, potential change in population and any habitual changes which may have arisen. It fails to fully address the first three bullet points in paragraph 39 of the NPPF.	restrictive in line with national policy (the NPPF clearly rejects inflexible maximum standards), local car ownership levels and observed issues in developments built to the current adopted maximum standards. As highlighted in the evidence paper, in respect of residential parking, whilst individuals might opt to use sustainable transport modes for some trips, trends suggest that they still own a car and need somewhere at home to park.	
71140	Ed Pigott	Barton Wilmore	The evidence paper is lacking in detail relating to where and how people use cars and why there is a need for such a level of unallocated spaces within major and flatted developments.	In the 2007 parking standards, there is no provision for visitor parking spaces, and parking spaces allocated to a particular property are inflexible for this purpose. The unallocated provision proposed for flats is therefore principally to address this issue. It is acknowledged however, that if all parking for flatted developments were to be unallocated (i.e. no spaces designated for use	Update paragraph 2.7 to suggest that overall provision may be lower where <u>all</u> parking spaces are provided to be unallocated within a development of flats.

				by residents of any particular flat), this is more flexible and may result in a need for a lower total provision.	
71140	Ed Pigott	Barton Wilmore	The potential significant increase in the parking requirement could have an adverse impact on high quality design and viability given the amount of space which will have to be given over to parking in any new developments and potentially expensive engineered solutions (i.e. undercroft/basements). Therefore, the issue of parking requirement needs to be less prescriptive and more flexible to allow for local circumstances; the allowances for failing to meet the standards set out in section 204 do not sufficiently allow for site-specific considerations to be taken into account.	<p>The draft standards have been designed to be flexible, with paragraph 2.2 identifying that individual schemes might make a case for higher of lower provision. Each case will be considered on its merits.</p> <p>Guidance on how to successfully accommodate parking has been included in the SPD, and the alternative observed on various sites throughout the district is for parking to occur in places where the design had not intended. This can create an unsightly environment, which can sometimes obstruct footpaths or highways including bus routes. Such undesirable parking has the potential to be unsafe and/or cause tensions between neighbours.</p>	N/A
71140	Ed Pigott	Barton	A parking survey is not a mechanism which	Paragraph 2.2 identifies	Specify

		Wilmore	will show, in every situation, that suggested provision is acceptable, but the draft SPD appears to use parking surveys as the only tool to allow for reduced parking provision in development.	that the amount of parking might increase or decrease from the specified requirement where special circumstances can be demonstrated. Examples of such circumstances could be specified. Paragraph 2.4 sets out the criteria which must be demonstrated to make a proposal of lower parking provision to be acceptable.	circumstances where deviation from the quantitative standards might be acceptable for residential development.
71140	Ed Pigott	Barton Wilmore	The draft SPD is also silent on how it would be possible to provide such levels of parking within a constrained site. The design guidance suggests various ways of providing parking but does not provide advice relating to how they have arrived at these standards irrespective of public transport provision or the sustainability of the location.	The draft SPD is a general guide. The design of individual sites is to be considered on their own merits. As above any provision which deviates from the specified standards will need to be clearly justified and will be considered on its own merits.	As above
71140	Ed Pigott	Barton Wilmore	The draft SPD also fails to consider the spatial variations of development, the impact this would have on living patterns and the impact this would have on requirement; something required by the NPPF.	As above any provision which deviates from the specified standards will need to be clearly justified and will be considered on its own merits.	As above

71140	Ed Pigott	Barton Wilmore	The standards are to be applied throughout the district which does not take into account the highly sustainable locations which are served by public transport and amenities obviating the needs for private cars (in some cases). The draft SPD should make the distinction between the sustainable urban areas within the district and allow for a reduced standard to reflect this.	As above any provision which deviates from the specified standards will need to be clearly justified and will be considered on its own merits.	As above
71140	Ed Pigott	Barton Wilmore	Overly prescriptive, inflexible parking standards have the potential to stifle these developments. Policy TR3 also makes specific reference to the need to provide an appropriate level of parking that does not discourage efficient use of land. It further states that the levels of parking provision for new development should recognise the needs of people and reflect the differences between areas. The draft SPD currently fails to do this and should be amended. Failing this, evidence should be provided to show that the draft standards are required in all areas of the district.	The draft parking standards have been drafted to ensure there is adequate parking provision, and they are intended to be more flexible than the 2007 maximum parking standards. It is the specific intention to increase the overall provision of residential parking for the reasons outlined. However, as outlined above, a range of criteria which may justify a different level of provision will be included along the lines of those set out for non-residential development.	As above
71140	Ed Pigott	Barton Wilmore	Warwick District has high-quality transport links via a number of main line railway stations connecting it to Birmingham and London. This means that some developments will be highly sustainable in nature and the parking standards should reflect this.	Acknowledged. Development around a transport hub such as a railway station would be an example of where it may be appropriate to	N/A

				adjust the level of parking in a new development proposal in line with paragraph 2.2 of the SPD.	
71140	Ed Pigott	Barton Wilmore	The NPPF is clear that the accessibility of a development and the availability to use public transport is something that should be taken into account when setting parking standards. Policy TR3 of the Local Plan is also clear that levels of parking provision should reflect differences between town centre, edge of urban and rural areas. The objective of Policy TR3 is to seek to balance these competing aims. The draft SPD fails to take this into account as, for residential properties, there is a lack of any spatial dimension allowing for change dependant on the sustainability of the location and the type of development (i.e. a flatted development for young professionals is less likely to require parking than family homes). This should be re-considered, and the draft SPD revised to bring it in line with the relevant policy. Alternatively, evidence should be provided to show that the standards are justified throughout the district and that all types of development would require the same level of provision.	As above. The standards are designed to be applied flexibly, and the location of any development will be considered on its own merits where it is used to justify a higher or lower parking provision than the standard.	N/A
71140	Ed Pigott	Barton Wilmore	Our view is that a parking survey does not capture all possibilities and a Transport Assessment may be appropriate in some circumstances; for example, where a development will require less parking provision.	A parking survey is required in the situations outlined in the SPD, and this corresponds to the updated Local Validation List.	N/A
71140	Ed Pigott	Barton Wilmore	In light of the above, there is a disconnect with both national and local policy. The draft SPD could also affect viability given the	Disagree. The aims of national and local policy are aligned. Site specific	N/A

			amount of parking that is required, the impact this will have on developable area, and the infrastructure required relating to electric vehicles.	and viability arguments can be considered on a case by case basis as appropriate.	
71140	Ed Pigott	Barton Wilmore	The draft SPD also changes the level of cycle parking that would be required within residential developments. It also sets out requirements for electric vehicle charging points in development at 1 charging point per unit (house with dedicated parking) and one charging point per 10 space (unallocated parking). No exceptions are set out within the standards, and it is unclear what the requirement is for other forms of development that require parking (i.e. flatted developments). In line with paragraph 153 of the NPPF, we consider that these standards should be predicated on robust evidence. There is currently no evidence set out in the Draft Parking Standards Evidence Paper relating to either cycle parking or electric vehicle charging points. The electric vehicle charging requirement is set out in the Council's Air Quality Action Plan (Addendum) dated April 2014. We are also of the view that consideration of viability is needed, and linked to this, greater flexibility.	In researching cycle parking a benchmarking exercise was undertaken against cycle parking standards in other local authority areas. Other LA areas regularly require greater cycle storage than the 2007 Warwick standards, so the move is to bring the district more in line with the surrounding areas, and to reflect the need to encourage travel by other more sustainable modes. The EV charging point requirements reiterate those that have been actively encouraged in guidance to developers since 2014, and have been implemented to a large extent. Any viability concerns will be considered on a case by case basis.	N/A Include benchmarking table on cycle storage for residential development in the accompanying evidence paper.
71140	Ed Pigott	Barton Wilmore	In summary the draft Parking Standards should be amended to provide clarity in how they are applied (we assume these are minimum standards). The draft Parking	As above, the standards are intended to be flexibly applied where appropriate, and	N/A

			Standards should be more flexible and less prescriptive with requisite justification. The draft Standards fail to acknowledge local circumstances in line with national and local policy.	variations (up and down) will be considered on a case by case basis.	
71139	Councillor Colin Quinney	District Councillor - Leam Ward	2.1 The proposal for HMO's is too generous compared to normal residential standards. A fifth of HMO's are not let to students and the ratio of bedrooms to cars is nearer 1 to 1 than 2 to 1. Fairer standard for HMO's would be 1 car per bedroom up to 2 bedrooms, as for residential, then 1 car for every 2 bedrooms.	The standard set out for HMOs in the draft SPD is based on available evidence and recognises that circa 80% of local HMOs are occupied by students. The response below (PBSAs) acknowledges that over time, the proportion of HMOs occupied by students may change and may therefore justify a change to the standard as currently proposed. This will be reviewed in due course.	
71139	Councillor Colin Quinney	District Councillor - Leam Ward	The proposals not to set a standard for Purpose Built Student Accommodation leaves a potentially large loophole and is not satisfactory. The standard should be set as per HMO's (treating each flat 'cluster' as a single HMO for parking purposes) but with permitted exceptions on a case by case basis. This would allow developments with convincing on-site management of zero car leases to be accepted should the current experiment with such an arrangement at Union Court ('Alumno') prove successful.	A separate SPD on Purpose Built Student Accommodation (PBSA) is in the early stage of preparation. The intention is that that SPD will encourage PBSAs and reduce the reliance on HMOs. Appropriate levels of parking for local PBSAs may be considered through this bespoke work, to ensure that parking does not become	N/A

				a constraint to them coming forward. The benchmarking undertaken in the evidence base does not provide a conclusive basis on which to propose a parking standards for this type of development, and a significant number of authorities actively discourage any parking associated with such developments.	
71139	Councillor Colin Quinney	District Councillor - Leam Ward	2.4 b) The proposed Unilateral Undertaking on some developments, to relinquish the right to Residents' permits, may help mitigate daytime parking pressures for existing residents in some areas eg Town Centres. However the major pressure in most areas is overnight resident parking. RPZ's do not operate at evenings or overnight. The proposal is therefore of limited value. All applications involving additional on-street parking, whether covering an RPZ in whole, in part or not at all should require there to be a full 100 degree parking survey and the planning focus should be on available overnight capacity.	Paragraph 2.3 sets out that "Where allocated requirements cannot be achieved, the submission of a parking survey is required with any planning application as set out in the Local Validation list". This is to be applied irrespective of whether the application site is within a RPZ or not.	Emphasise this statement more – bold.
71139	Councillor Colin Quinney	District Councillor - Leam Ward	2.7 Make it clearer that the unallocated spaces required for developments of more than 10 units are additional to the minimum off-street parking space requirements per dwelling.	Noted	Amend the first sentence of para 2.7: <i>Unallocated parking spaces in addition to the allocated provision, should be provided as</i>

					<i>set out in the standards where:</i>
71139	Councillor Colin Quinney	District Councillor - Leam Ward	<p>2.11 This paragraph refers to allocated, i.e. on plot, parking spaces that have different dimensions to those specified in the methodology for parking surveys referred to in para 2.8 on the same page. Therefore, for avoidance of doubt, para 2.11 should be amended as follows:</p> <p>In line with emerging WCC advice, parking space dimensions FOR ALLOCATED PARKING ON-PLOT required by this SPD are greater than those that have been sought in the past. The dimensions below are minimum requirements:</p>	Agree with the principle, however there may be defined parking bays that are not provided on plot, and may not be allocated. Therefore propose to amend the sentence to reflect that such spaces should meet these minimum dimensions also.	Amend para 2.11
71139	Councillor Colin Quinney	District Councillor - Leam Ward	<p>4.3 A3 & A4 Evidence base suggests the standards for these two categories are too generous and should be tightened in line with neighbouring authorities to reflect growing car ownership and on-street parking stress during evenings near such high customer volume commercial premises.</p>	Agreed. Reduce the standard in line with the evidence base.	Amend standard for A3 and A4
71139	Councillor Colin Quinney	District Councillor - Leam Ward	<p>B1c. Evidence base suggests there has been a small loosening of standards for this category. But the ratio quoted for Low access standards in 2007 at 1/40 is identical to the new proposed standard. Is there an error in text or in the two ratios given ?</p>	Agreed this appears to be an error, and the proposed parking standard should be amended to 1/30 sq.m.	Amend standard for B1c (in the SPD and the evidence paper.
71139	Councillor Colin Quinney	District Councillor - Leam Ward	<p>Cycling Standards Evidence and policy both seem to point to the need to tighten cycling standards for A3, A4 , B1, B8 and D1 medical establishments, not leave them unchanged.</p>	The non-residential benchmarking exercise (p33-35 of the evidence paper) does illustrate some variation in minimum standards for	Amend A3 and A4

				<p>these use classes. Generally (though not wholly) other LAs have higher minimum cycle parking standards than those specified in the draft – some of them substantially higher. This is particularly true for A3 and A4 use classes.</p> <p>In the case of B1, there is some variation though the draft standard is consistent with Startford’s, as is also the case for D1. On this basis it is proposed to maintain the existing standard, which is expressed as a minimum, so there is plenty of scope to provide additional spaces should there be demand.</p> <p>The comparison of B8 cycle parking standards is mixed, with some higher than proposed in Warwick District, and some lower. On this basis it is proposed to maintain the existing standard, which is a minimum.</p>	
71139	Councillor Colin Quinney	District Councillor -	APPENDIX A I support Mr Richmond's responses to this	Noted – see response to Mr Richmond’s comments	As below (representation

		Leam Ward	<p>section viz</p> <p>1. The figures given in the results tables shown in the consultation response document require correction. 2. The parking stress figures for streets B and C for not in a RPZ in the Parking Standards Document are incorrect. 3. The calculation of the number of spaces is overstated and should be factored down to 90% to reflect practical capacity (see 2005 Arup study). Parking stress should then be re-calculated. 4. Parking demand from residential developments approved, but not yet constructed/occupied should be added to the total measured demand on the basis of the Parking Standards Document</p>	below (representation references 71112 and 71113)	references 71112 and 71113)
71138	Jasbir Kaur	Warwickshire County Council	The Highway Authority has considered the parking standards set out in the SPD. The Highway Authority generally supports the parking space provision standards as set out within the document.	Noted	N/A
71138	Jasbir Kaur	Warwickshire County Council	The Highway Authority does note that some of the proposed standards refer to provision of spaces as appropriate, and it is considered that this potentially provides scope for a significant difference in assessment/quantification of parking supply.	Emailed Jasbir Kaur 16/5 to clarify what this means. No response received to date.	
71138	Jasbir Kaur	Warwickshire County Council	There is no inclusion of disabled parking provision within the standards. It is recommended that this is included within the document to ensure it accords with the Equality Act 2010.	<p>Paragraphs 4.11 – 4.15 address disabled parking for non-residential developments.</p> <p>There is not an explicit standard for residential development, however</p>	N/A

				'best practice' through the use of Lifetime Homes standards is explicitly encouraged in paragraph 2.12.	
71138	Jasbir Kaur	Warwickshire County Council	The 'undertaking a parking survey' included within the residential parking chapter could also be referenced at para 4.7 in the non-residential parking chapter.	Noted. However the residential parking survey methodology to which this corresponds does not directly translate to all non-residential development types. For example, non-residential development types which might be occupied in the day and closed at night would not benefit from a survey undertaken in the early hours of the morning.	N/A
71137	Jenny Mason	Whitnash Town Council	2.1 How much parking? Members object to onsite parking for HMO's. There should be 1 parking space per bedroom not one space for every two bedrooms.	The standard set out for HMOs in the draft SPD is based on available evidence. Whilst this representation (and others) highlight concern that it is insufficient, there will be variations in demand based on location, and whether or not on plot parking is a feasible option. The standard may therefore be applied flexibly.	N/A
71137	Jenny Mason	Whitnash Town	Visitors have cars as well.	Noted and agreed. The SPD sets out a	N/A

		Council		requirement for unallocated parking to be provided as part of major developments, primarily for visitors.	
71136	Diane Clarke	Network Rail	No comments	Noted	N/A
71134	Tom Podd	Jaguar Land Rover	Jaguar Land Rover welcomes the supplementary guidance in relation to parking standards.	Noted	N/A
71134	Tom Podd	Jaguar Land Rover	The approach to EV charging points in non-residential development is supported and represents a pragmatic approach to the provision of charging points.	Noted	N/A
71134	Tom Podd	Jaguar Land Rover	The flexible approach to standards in the SPD, taking account of the specific circumstances of the development proposal, is welcomed.	Noted	N/A
71134	Tom Podd	Jaguar Land Rover	<p>It would be helpful if further clarity is provided in the document as to when parking in excess of the standard would be acceptable. This is particularly relevant given the current NPPF consultation which proposes to add paragraph 107 and reflects earlier ministerial statements on maximum parking standards.</p> <p>The SPD currently provides a list of exceptions to the parking standards set out in Table 2. However these exceptions relate to when a lower provision may be justified.</p>	Agreed	Insert specific circumstances which might be considered as a reason to provide more parking than the standard (para 4.7).
71134	Tom Podd	Jaguar Land Rover	Given the nature of Jaguar Land Rover's business, parking need and demand can vary and will often exceed typical standards. For example for managing fleet vehicles or due to flexible working arrangements where inter-site travel is common. Whilst Jaguar Land Rover promotes alternative modes of transport, the	Agreed – as above	Insert specific circumstances which might be considered as a reason to provide more parking than the

			<p>nature of the business means that standard levels of parking provision may not be appropriate.</p> <p>It would therefore be appropriate to include within the SPD reference to the individual circumstances of employers, taking into account the nature of the business and site specific considerations in allowing parking in excess of the standard.</p>		standard (para 4.7).
71134	Tom Podd	Jaguar Land Rover	It is also encouraging that the SPD acknowledges the need for larger parking bays. Both larger vehicles and EV charging requirements mean that traditional sized parking bays (2.4 x 4.8m) are increasingly unsuitable for modern vehicles. The increase in the size of parking space is therefore welcomed as is the emphasis on them being minimum dimensions.	Noted	Improve cross reference to parking space dimensions between residential and non-residential development, and EV bays
71129	Sharon Jenkins	Natural England	No comments	Noted	N/A
71128	Tom Stephenson	Warwickshire Fire and Rescue Service	Provided a link to fire guidance published on the council's (county) website. Please pay particular attention to section 2, access and facilities for the fire service as we are increasingly coming across new developments where fire appliances access is either restricted due to the layout of the development or insufficient parking/poorly designed parking layout.	Noted	
71127	Katherine Geddes	Leamington Spa Town Council	"The Planning Committee of Royal Leamington Spa Town Council has examined both updated Supplementary Planning Documents and finds both documents to be clear improvements on the previous versions. The information and diagrams contained within both guides provide	Noted	N/A

			welcome clarity and more detail on points such as the requirements for satisfactory parking surveys and required distances between new dwellings. The documents retain useful information from the previous versions and go on to include new points relevant to applications being submitted in 2018. This greater amount of user friendly guidance will reduce the number of queries we have had to make on previous occasions. Both documents will also be more helpful when considering planning applications and when residents/applicants approach us with queries."		
71126	Sarah Brooke-Taylor	Individual	<p>Responding to "How much parking?", 2.1, table 1.</p> <p>Objection. Too few parking spaces suggested under "new dwellings".</p> <p>A one bed dwelling can accommodate up to two adults, both of whom may have a vehicle. A two bed dwelling could accommodate three or four adults (for example, parents with adult child or two couples), all of whom may have a vehicle.</p> <p>A three bed dwelling could accommodate anything up to six adults (parents with two adult children each living at home with their respective partners for example), all of whom may have a vehicle.</p> <p>I would suggest two spaces for both a one and two bed dwelling and at least three spaces for a three bed dwelling. I agreed that dwellings with four or more bedrooms should require a minimum of one space per bedroom.</p>	<p>The draft SPD is seeking to accommodate average parking demand for different types of housing, based on available evidence. Whilst it is accepted that in some cases, the actual parking demand may exceed the proposed standards in some properties, the opposite may also be true in others. The actual demand will also inevitably vary over time as families grow and change and as residents move.</p> <p>Over provision of parking can have negative impacts such as creating</p>	N/A

				<p>large expenses of hardstanding, and impacting on the streetscene. It can also add unreasonable costs to a development. The SPD is therefore attempting to strike a challenging balance of providing sufficient parking, but not overproviding spaces.</p> <p>The SPD aims to mitigate some of the impact of actual demand in any given property exceeding the parking provision by including a requirement for unallocated parking. This type of parking is available to all and therefore builds in some flexibility for residents and their visitors.</p>	
71114	Gordon and Patricia Cain	Kenilworth Civic Society	Object to HMO's not having recommended car parking.	HMOs have a bespoke parking standard defined in table 1.	N/A
71114	Gordon and Patricia Cain	Kenilworth Civic Society	Parking surveys need to be carried out early evening when residents have returned home from work.	The parking survey methodology set out in Appendix A specifies that they should be undertaken between the hours of 00:30-05:30. This is based on the Lambeth Methodology which is a widely	N/A

				accepted methodology, and aims to ensure that residents are home and parked when surveys are undertaken.	
71113	Mr Robin Richmond	Individual	<p>Appendix A - Residential Parking survey methodology - Areas within a Residents Parking Zone (RPZ) and Areas within a RPZ</p> <p>The figures given in the results tables (there are two of them - one under each heading) shown in the consultation response document are incorrect (they do not use a 6m length as set out in the preceding text) and do not match those in the Parking Standards document. Also the parking stress figures for streets B and C for streets not in a RPZ in the Parking Standards Document are incorrect. The tables in the consultation response document should be replaced by the the correct tables (see attachment)</p>	<p>The figures in the tables in appendix A are given as an example only. Nevertheless they have been checked, and do contain figures which reflect the methodology – i.e. 6m. (N.B the figures were amended prior to publication for consultation from the version presented to Executive and Scrutiny Committee, which may account for this comment).</p> <p>It is however acknowledged that there is an error in the figures for parking stress for streets B and C which should be corrected.</p>	Correct the parking stress figures for streets B and C for areas not in an RPZ in the table.
71113	Mr Robin Richmond	Individual	The calculation of the number of PHB spaces (in RPZ) or the number of parking spaces (not in RPZ) is overstated as, in practice, any given street is rarely filled to true capacity due to vehicles coming and going, variations in gaps between parked cars and so on. These figure should be factored down to 90% in line with the methodology set out in the 2005 Arup	It is accepted that the number of parking spaces represents a theoretical capacity, and that in practice there may be variations as highlighted. A generous allowance for the length of each vehicle	N/A

			study, which underpinned the Decriminalisation of Parking Enforcement (DPE). Parking stress should then be calculated against these, lower, figures.	has been allowed in this locally tailored methodology (6m). The SPD refers to minimum length for a parking space elsewhere as 5m, and 5m is the length commonly referred to in other examples of the Lambeth Methodology on which this is based. This already decreases the theoretical capacity of any given street, and it is not therefore considered appropriate to factor this down further as suggested.	
71113	Mr Robin Richmond	Individual	<p>Appendix A - Residential Parking survey methodology - Required information</p> <p>This section does not provide for the inclusion of future parking demand from residential developments approved, but not yet constructed and occupied. WCC keeps records of these and demand should be added to the total measured demand (from the parking survey) on the basis of the Parking Standards requirements.</p>	<p>Noted. The final section of Appendix A – ‘Understanding the results’ (second paragraph) does identify that the Council will take into consideration any other recently permitted schemes in determining the acceptability or otherwise of the results, and suggests that applicants can seek this information via the Council’s website. However, this could be highlighted with paragraph 2.8 of the SPD which talks about</p>	<p>Add reference to other approved schemes in paragraph 2.8.</p>

				undertaking a survey.	
71112	Mr Robin Richmond	Individual	<p>Parking Space Dimensions - Para 2.11</p> <p>This paragraph refers to allocated, i.e. on plot, parking spaces that have different dimensions to those specified in the methodology for parking surveys referred to in para 2.8 on the same page. Therefore, for avoidance of doubt, para 2.11 should be amended as follows:</p> <p>In line with emerging WCC advice, parking space dimensions FOR ALLOCATED PARKING ON-PLOT required by this SPD are greater than those that have been sought in the past. The dimensions below are minimum requirements:</p>	Agree	Amend para 2.11 as suggested
71110	Mrs Judith Falp		<p>I believe that the proposed amount of parking especially for H.M.O's is unrealistic Most people have cars now and if they do not visitors to their properties do. Nearly every planning application mentions parking as an issue. We are planning in problems, creating issues for the future</p>	<p>Each of the parking standards in the draft have been informed by available evidence. Largely the draft SPD is expected to increase the amount of parking when compared with the current adopted maximum standards. They are also intended to be more flexible, with potential for more parking still where there is clear justification, something which the adopted SPD does not allow for.</p> <p>The standard set out for</p>	

				HMOs in the draft SPD is based on available evidence. Whilst this representation (and others) highlight concern that it is insufficient, there will be variations in demand based on location, and whether or not on plot parking is a feasible option. The standard may therefore be applied flexibly.	
71142	Kenilworth Town Council	Town Council	1. Welcomes a more realistic approach to parking provision arising from the NPPF.	Noted	N/A
71142	Kenilworth Town Council	Town Council	2. Appreciates the comment that Kenilworth has fewer non-car households than the average for the District (due to a relatively older and wealthier population), but notes the District-wide standards are still applied - so Kenilworth and some other areas will be under-provided.	The standards seek to target average demand and build in additional flexible provision through incorporating unallocated parking within major residential developments. It also allows for variation from the standard (which the old maximum standards didn't do) should there be adequate justification to do so.	N/A
71142	Kenilworth Town Council	Town Council	3. Points out that most of the new development in Kenilworth is far from the Town centre and so car ownership is likely to be even higher than the current town average despite any plans for pedestrian and cycle access.	Residential parking standards aim to accommodate cars at home, where vehicles will be left if residents choose to make some journeys by alternative modes.	N/A

71142	Kenilworth Town Council	Town Council	4. Welcomes the larger space requirements for individual parking spaces. Possibly because of JLR there do seem to be lots of large cars in the town.	Noted.	N/A
71142	Kenilworth Town Council	Town Council	5. Notes and supports the increased requirements for 4 bedroomed houses but paragraph 2.2 only relates the standards to new build. The Town Council sees no reason why it should not apply to home extensions increasing the number of bedrooms as the parking problems are just the same.	Noted. It is accepted that extensions have the potential to result in increased demand for parking at a property. Paragraph 2.2 can be updated to reflect this, however each case will need to be considered on its own merit, based upon the location, size and orientation of the plot and the scale of the extension proposed.	Encourage consideration of parking for householder extensions. Paragraph 2.2.
71142	Kenilworth Town Council	Town Council	6. Does not agree that HMOs require fewer spaces than houses with the same number of bedrooms, particularly when the occupants are more likely to be adults and therefore car owners. This will be the case with 4 bedroomed HMOs.		
71142	Kenilworth Town Council	Town Council	7. Notes that paragraph 2.15 refers to the ability of bicycles and wheeled bins to pass cars in the drive and feels that push chairs and mobility scooters should be mentioned as well.	Agree. Reference to these items will be added.	Add reference to the potential need for pushchairs and mobility scooters to be able to be manoeuvred past a parked car on a driveway – paragraphs 2.13-2.14.
		Individual	Looking through a recent planning Committee	We have taken legal	N/A

			<p>agenda, I noted that you are still recommending using Section 106 agreements to restrict on street car parking. I wonder if that is still appropriate in the light of a recent court case identified below, unless that has now been overturned? I noticed your report on car parking standards and the use of S106 agreements.</p>	<p>advice to clarify the position. The obligations used in Warwick District differ in approach from those overturned in the Khodari case, and we consider them to be S106 compliant.</p>	
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