



PARTIAL REVIEW OF REGIONAL  
SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Car Parking  
June – July 2008

CONSULTATION RESULTS

## North West Regional Assembly

### **PARTIAL REVIEW OF REGIONAL SPATIAL STRATEGY (RSS) –**

Consultation on the Draft Options: Parking Standards

A consultation report from

#### **CAG Consultants**

in association with **Concept 4 Creative and Community  
Consultants**

July 2008

CAG CONSULTANTS  
Gordon House  
6 Lissenden Gardens  
London NW5 1LX  
Tel/fax 020 7482 8882  
hq@cagconsult.co.uk  
www.cagconsultants.co.uk

for direct enquiries about this report please contact:

Emma Cranidge  
Ewood House, Ewood Lane, Todmorden, OL14 7DF  
tel 01706 817347 or mob 07879 017617  
[ec@cagconsult.co.uk](mailto:ec@cagconsult.co.uk)



# Contents

**Introduction to this report**

**Workshop Responses**

**Draft Project Plan Responses**

**Questionnaire Responses by question**

**Appendix One – Options for Parking Standard**

**Appendix Two – Category Definitions**



# Introduction

This report brings together the collated responses to the North West Plan Partial Review consultation on the options for Parking Standards

The consultation took place between 1<sup>st</sup> June and 4<sup>th</sup> July 2008 and focussed on seeking out stakeholder views on a series of options. These options are show in Appendix One.

Stakeholders were invited to contribute their views in one of the following ways;

- Workshops for stakeholders
- An online or paper questionnaire
- Via a free phone number

Stakeholders had also had the opportunity to comment at the earlier Consultation on the Draft Project Plan stage.

The consultation activity is discussed in more detail in the full project report. This report outlines what people told us about the options in these themes through the methods outlined above.

Section One lists the workshop responses and Section Two the Draft Project Plan Responses and Section 3 lists the responses received. These responses were received through the online questionnaire, the paper questionnaire, the free phone line and by letter.



# 1. Workshop Responses

In this section we draw together all the information given to us by stakeholders who came to the workshops. For this theme there was one workshop in the consultation period.

## Choice of options

In the session there were two working groups. One working group agreed broadly with using the revised figures. While the second felt there were other possible options for parking standards. These were;

- **Option 1** - Leave standards as existing (untenable, reflected in second proposed option).
- **Option 2** - Update standards to account for changes in Land Use Class Order including more land use options but perhaps not including accessibility.
- **Option 3** - Use the revised figures suggested by the consultants report.
- **Option 4** - do not have parking standards set at a Regional level, just at a local level.

## Categories

Both groups felt that the categories A, B and C needed some clearer definition on the table and in general. North West Regional Assembly responded to this issue during the consultation by posting a detailed paper on the web site. This paper can be found in appendix three.

One working group also felt that the problem with option 2 is the very definitions of A, B, C. The metropolitan/rural areas are easy to define, whereas category B is less so in relation to cross-boarder/areas adjacent to metropolitan boundaries. Refining the definitions, including named towns and defining the standards to be applied, may be practical at LDF level. The RDF's may need to define categories if category A sites are skewed into B at margins. Parking standards alone will not place sites in the A, B, C categories. However the group did feel that this categorisation is better than the existing metropolitan/not metropolitan divide.



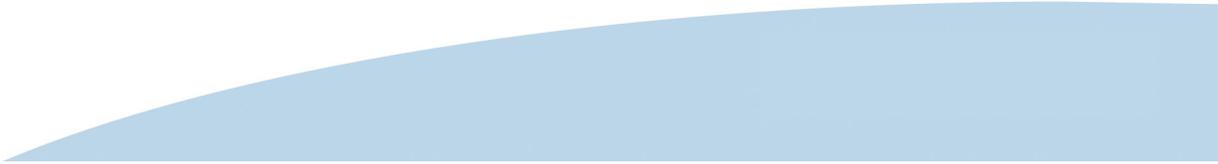
## Other issues raised

The groups discussed a range of general issues relating to the options. These included;

- Local parking strategies are required in the review assessing developments in context to the wider area, traffic management orders and demand management policy such as stadium parking on a weekend. It would be helpful for the RSS to state what has to be done.
- If plans are set locally, rather than regionally, there may be inconsistency issues between Authorities. There is existing guidance in PPS4(draft) accounting for planning guidance and includes issues such as economy.
- Parking standards are critical to demand management, particularly car based demand at destination. Policies aim to reduce car travel by reducing available parking. If different Authorities have the capability to relax standards at the local level, this may place developers in a situation of playing one Authority off against another in terms of offering to bring a development to a certain area as opposed to a developer going somewhere else, perhaps even a different region, which may impact on the NW economy.
- An important consideration in terms of economy is that, if the standards are too restrictive, people may choose to visit somewhere dependant on availability of parking spaces. This may result in a potential competition between LA's.
- Minimum standards would be preferred or the flexibility to negotiate.
- Some standards may be difficult to police i.e. when residents dig up their front lawns for parking causing problems of water run-off , visual and environmental impacts need to be assessed.
- Review of the LDF documents will be required to ensure parking standards are in accordance with the RSS. Local standards may differ by providing 'maximum' standards with the flexibility of 'special case' scenarios.

## Infrastructure implications

In the working groups some infrastructure implications were identified. These included;

- There is the potential for more public transport provision focussing towards S106 agreements where the developer not only pays into road improvements but also
- 

pays into a public transport pot at an appropriate amount in scale with the development. This may also mitigate a stance on not allocating all the car parking spaces a developer is requesting. The developer can be encouraged to think about how the site is accessed by non-car users and how decreasing car parking spaces will increase the land available for other uses.

- Congestion is becoming an issue in urban centres to a point where the public have no choice other than travelling by public transport, but the public transport provision must step up to satisfy demand when existing capacity is reached. This will require review.

## Community and Social Implications

Groups had strong feelings about some of the social implications in particular issues arising from trying to bring about behaviour change through car parking standards, these included;

- If off-street parking is limited at a destination, say at a business site, people begin to park on residential streets and then walk to their destination. So restricting parking does not result in reduced car use, but creates a new problem. This may then require parking control zones/residents permits
- Narrowing roads to reduce parking spaces is not a useful response as it has knock on implications such as emergency vehicle access
- Parking at origin is less of an issue on car ownership (but restricting numbers will cause problems) than parking at the destination and reducing car parking spaces will not change behaviour alone. Other incentives, such as congestion charges, increased tax and petrol costs may collectively influence car ownership and journeys taken
- Comparing the impact of both options on car trips saved by the more stringent standards would be a useful exercise. Working out the carbon saving may illustrate how option 2 is better than option 1.



## 2. Draft Project Plan Responses

A review of the participant responses shows that participants who responded raised the following key issues

1. Local Authorities and station operators should consider making additional provision for car parking at railway stations, so as to promote maximum use of the rail network;
2. It is hoped that new updated standards will help local planners reach constructive, innovative and environmentally sympathetic solutions;
3. Cumbria does not have the public transport infrastructure of the city regions. Therefore it requires a less restrictive car parking standard;
4. The needs of disabled drivers need consideration; and
5. Parking needs to be considered within wider transport issues

These summary key issues have been drawn from the verbatim comments listed below;

| <b>Organisation:</b> | <b>2h. Update of Regional Parking Standards.</b>   |
|----------------------|--|
| The National Trust   | These cannot be considered in isolation of other matters relating to transportation, including the investments to be made in public transport and provision for cyclists and pedestrians, and the potential for a 'charging zone' around Greater Manchester.   |
|                      | Given the increase in vehicle usage in all areas and the unsuitability of most built up areas to cope it is essential for a pro-active stance to be adopted with the review and redevelopment of a Regional Parking Standard. By incorporating seasonal fluctuations within the Strategic Master Plan it will be possible to focus on traffic management as an integral part of the planning process as opposed to the more traditional add-on approach. |
|                      | NW TAR notes that national government policy has pre-empted the work the North West has been carrying out on regional parking standards and is unclear how this will now be taken forward. A   |

| <b>Organisation:</b>               | <b>2h. Update of Regional Parking Standards.</b>   |
|------------------------------------|--|
|                                    | statement in the final version of the Project Plan for the Partial Review would be appreciated. Meanwhile, we would re-iterate our disappointment that the work which was conducted in this region failed to get to grips properly with the issue of parking at railway stations and did not include an investigation of park & ride or an attempt to produce recommended standards for park & ride sites. Best practices from other regions should be considered.   |
|                                    | Parking in Trafford is the number 2 issue after transport generally which the public want discussed but never is   |
| Blackpool Equalities Forum         | <p>The forum was not aware that there were any existing standards. We thought that these would be most helpful especially around parking for disabled people. We feel that Regional Standards should:</p> <ul style="list-style-type: none"> <li>• Set a minimum requirement or an acceptable level for parking and encourage local authorities to go above and beyond this.</li> <li>• Consider the needs of disabled residents, when considering permit holder residential parking – possibly allocating spaces near to the houses of disabled residents.</li> <li>• New roads: ensuring that they are wide enough so as to discourage parking on pavements as mentioned in 2c.</li> </ul> |
| Upton Greenbelt Preservation Group | Panel Report. Recommendation R7.7 stated 'Local Authorities and station operators should consider making additional provision for car parking at railway stations, so as to promote maximum use of the trail network.  |
| Knutsford Town Council             | Parking in our historic town centre is perceived as being at breaking point. It is hoped that new updated standards will help local planners reach constructive, innovative and environmentally sympathetic solutions.   |
| North West Environment Link        | It is important to retain regional parking standards to ensure consistency and to facilitate driving modal shift – allowing local authorities to determine their own standards may lead to a loosening of standards and therefore encouragement to make more use of the private car in the competition for perceived economic benefits.  |
| University of Cumbria              | Being a large yet dispersed county, Cumbria does not have the public transport infrastructure of the city regions. Therefore it requires a less restrictive car parking standard. The University supports the findings of the Examination in Public panel which found that the Key Service Centres should have the regional parking standard applied. Furthermore, and given the point made above about public transport, the proposed ratios for Higher Education in table 10.1 'Regional Parking   |

|                      |  |
|----------------------|--|
| <b>Organisation:</b> | <b>2h. Update of Regional Parking Standards.</b>   |
|                      | Standards' are inadequate and should at least be revised back to the allocation made in PPG13. |

# 3. Other Responses

## 1.1. Do you agree with Car Parking Option 1?

When asked people told us;

| Do you agree with Car Parking Option 1? |           |
|---|-----------|
| Yes                                     | 2         |
| In part                                 | 2         |
| No                                      | 29        |
| Don't know                              | 1         |
| No response                             | 5         |
| <b>Total Responses</b>                  | <b>39</b> |



The table below shows the verbatim comments received. We have removed 3 blank responses.

| Organisation:                         | 1.1. Do you agree with Car Parking Option 1? | 1.1a. If so why? | 1.1b. If not, why not?  | 1.1c. Please explain your answer to the previous question. |
|---------------------------------------|--|------------------|---|--|
| Macclesfield Borough Council          | No   |                  | Fails to meet the commitment in RPG13 to review parking standards every five years.                           |  |
| Individual response                   | No   |                  |   |  |
| Northwest Regional Development Agency | No   |                  | We do not consider the retention of existing parking standards from RPG13/Draft RSS to be a realistic option, |  |

| <b>Organisation:</b>  | <b>1.1. Do you agree with Car Parking Option 1?</b> | <b>1.1a. If so why?</b>  | <b>1.1b. If not, why not?</b> | <b>1.1c. Please explain your answer to the previous question.</b> |
|---|---|--|-------------------------------|---|
|   |   | given the commitment in RPG13 that these are reviewed at least every 5 years and the detailed work undertaken on this issue by consultants Mouchel.  |                               |   |
| Countryside Properties.   | Yes   | On the basis that the RSS, should concentrate on overarching strategic issues Option 1 should be preferred.  |                               |   |
| Halton Borough Council  | No  | The existing standards are now five years old and there is professional agreement that the standards need to be reviewed and updated in line with current transport policy and planning needs and approaches. Demand management is now the fundamental approach to be pursued, particularly within the urban context, and parking management is core component of an effective demand management policy. |                               |   |
| National Trust  | No  | Need to regularly review standards in response to changing circumstances.  |                               |   |
| Sefton Metropolitan Borough Council                                   | Don't Know  | The initial view is that the revised standards could be supported. However, in the short time available since the publication of the document it has not been possible to fully consult Technical Services colleagues, and their views need to be taken into account before the response is submitted.   |                               |   |
| Cheshire West and Chester (comments represent informal officer views) | No  | We agree that this option would however fail to meet the commitment outlined in RPG13 to review parking standards every five years.  |                               |   |
| Lancashire County Council   | No  | Option 2 is preferred  |                               |   |
| Merseyside Policy Unit  | No  | The existing standards are now five years old and there is professional agreement that the standards need to be reviewed and updated in line with current transport policy and planning needs and approaches. Demand management is now the fundamental approach to be pursued, particularly within the urban context, and parking management is core   |                               |   |

| Organisation:  | 1.1. Do you agree with Car Parking Option 1? | 1.1a. If so why?  | 1.1b. If not, why not? | 1.1c. Please explain your answer to the previous question. |
|--|--|---|------------------------|--|
|  |  | component of an effective demand management policy.   |                        |  |
| Allerdale Borough Council                                | No   | Whilst we have little concern about the actual standards in RPG13, they are not sufficiently sensitive to real accessibility criteria relying as they do on arbitrary definitions of "Regional" and "Urban Conurbation". Also, they do not include standards for bicycles, motorbikes etc.  |                        |  |
| Haslington Parish Council                                | No   | Understand the need to review, but accept that existing definition could be acceptable.   |                        |  |
| Stockport Metropolitan Borough Council                   | No   |   |                        |  |
| Carlisle City Council                                    | No   | In particular RSS does not consider residential car parking requirements which is now a void as PPS3 has replaced the previous guidance   |                        |  |
| Lambert Smith Hampton                                    | No   | Do not agree that existing parking standards as detailed in PRG13 and draft RSS should be retained. Many of the use classes are omitted from table 1 including C3. The maximum car parking guidance for residential dwellings has been removed from national guidance, and as such a general guide should be set out in RSS, in order to ensure consistency across the region.  |                        |  |
| AGMA (the Association of Greater Manchester Authorities) | No   | AGMA's preference would be for Option 2, subject to clarification of a number of issues. The revised standards were prepared in line with Draft RSS; in advance of the Panel Report (following the Examination in Public) and the Government's Proposed Changes. In the light of these changes the links between key RSS policies and the new parking standards need to be reviewed, in particular how they will operate as part of the regional spatial framework given the removal from the policies of a settlement hierarchy. |                        |  |

| <b>Organisation:</b>               | <b>1.1. Do you agree with Car Parking Option 1?</b> | <b>1.1a. If so why?</b>  | <b>1.1b. If not, why not?</b> | <b>1.1c. Please explain your answer to the previous question.</b> |
|------------------------------------|---|--|-------------------------------|---|
|                                    |   | AGMA would wish to have the opportunity to comment in much greater detail on the proposed revised standards, since this consultation on broad options does not appear to permit this.  |                               |   |
| GVA Grimley (on behalf of Goodman) | No  | There needs to be some change to allow for growth and sustainability. The proposed replacement parking guidelines consider much more detail than the existing ones.  |                               |   |
| Emerson Group                      | In Part   | The existing standards have gained general acceptance and are relatively simple to understand and operate. It would however be better to have added to these the missing elements such as A2 and dwellings   |                               |   |
| Chorley Council                    | No  | Option 1 would fail to meet the commitment outlined in RPG13 to review parking standards every 5 years   |                               |   |
| Wirral MBC                         | No  | The standards need review and the new proposed standards are more comprehensive and are likely to be more sensitive to local circumstances   |                               |   |
| University of Cumbria              | No  | Categorizing parking standards on the basis of Key Service Centres and Regional Centres is too rigid and doesn't take into account the local variations in accessibility across an economically and geographically diverse region. Even within these categories there is no differentiation between centres so the parking standard for a new HE centre in Barrow for example would attract the same parking standards as one in Manchester which would clearly disadvantage students at the former site with less good access to public transport. Also, the standards are more restrictive than those set out in PPG13 which is unrealistic for a county such as Cumbria which comprises dispersed communities over a large area with a relatively poor public transport infrastructure. |                               |   |

| <b>Organisation:</b>    | <b>1.1. Do you agree with Car Parking Option 1?</b> | <b>1.1a. If so why?</b> | <b>1.1b. If not, why not?</b>          | <b>1.1c. Please explain your answer to the previous question.</b>   |
|-------------------------|---|-------------------------|--|---|
| Congleton.gov.uk        | No  |                         |  |   |
| NW Transport Roundtable | No  |                         | The new standards offer a better tool. |   |
| Highways Agency         | No  |                         |  | There is a need to update standards to reflect revisions to land use classes. There is a need to align parking standards with RT2 policy aim to manage travel demand, especially car use. Retaining existing standards could result in an unworkable set of standards. It could miss the opportunity to strengthen the importance of parking standards as an integral part of a successful travel demand management strategy / policy.  |
| Cheshire East Council   | No  |                         |  |   |
| Chester City Council    | No  |                         |  | The proposed car parking standards outlined by the consultants present a positive way forward in enabling a regional overview of parking provision to be created while allowing Local Authorities to tailor the precise standards to meet their local needs. The linking of parking provision to accessibility as opposed simply to the land use is a positive approach, which reflects that taken by the Council in its adopted Supplementary Planning Guidance, 'Parking Provision within Developments in Chester' (2003). However, the increased number of land use definitions, while helpful, is likely to generate a greater number of options which will result in greater complexity in interpretation. |
| CPRE North West         | No  |                         |  | see answers to question 2: This is a much more sophisticated and nuanced tool that is more fit for purpose and more likely to achieve the aims for which maximum parking standards are intended. It is a much better complement to the spatial principles, spatial framework and policies RT2 & RT9 and better implements the aims of RSS. However, it should have  |

| Organisation:  | 1.1. Do you agree with Car Parking Option 1? | 1.1a. If so why?  | 1.1b. If not, why not? | 1.1c. Please explain your answer to the previous question. |
|--|--|---|------------------------|--|
|  |  | been further improved by addressing parking at railway stations and park and ride sites. The standards for cycling spaces could also be more ambitious in order to better reflect the context of RSS policies.  |                        |  |
| English Heritage                                       | No   |   |                        |  |
| Dalton Hall Business Centre                            | Yes  |   |                        |  |
| Cumbria County Council / Cumbria Strategic Partnership | No   | <p>Cumbria County Council had been opposed to the car parking standards in the draft RSS Table 10.1 at the time of the Examination-in-Public in 2006/07, as it was concerned that that the Regional Parking Standards, as referred to in Policy RT6 – ‘Parking Policy and Provision’, appeared to indicate a more restrictive standard for Regional Towns and Cities such as Carlisle and Barrow-in-Furness, which were significantly lower than the standards set in the adopted Cumbria and Lake District JSP Policy T32 – ‘Car Parking Standards’. This point relates to the County Council’s view that Cumbria does not have a high quality network of transport links (or adequate car parking provision) to support the envisaged economic growth. As a result of the extremely rural character of the County and dispersed nature of the communities in Cumbria, car travel is likely to remain very important. Therefore car parking standards should be more flexible in Cumbria to recognise the fact that local communities are more likely to be reliant upon the use of the car compared to more urban locations elsewhere in the NW.</p> <p>In line with the EIP Panel report, the GONW accepted less stringent car parking requirements in rural areas in Table 8.1 of the Proposed Changes to RSS (North West Parking Standards), including in Key Service Centres in Cumbria, except for Carlisle, Barrow-in-Furness, Workington and Whitehaven, which would have the higher standards</p> |                        |  |

| <b>Organisation:</b>               | <b>1.1. Do you agree with Car Parking Option 1?</b> | <b>1.1a. If so why?</b> | <b>1.1b. If not, why not?</b> | <b>1.1c. Please explain your answer to the previous question.</b>  |
|------------------------------------|---|-------------------------|-------------------------------|--|
|                                    |   |                         |                               | <p>applicable to urban areas across the North West. In our responses to the Proposed Changes to the RSS, the less stringent standard has been supported for the rural parts of the District, but Cumbria County Council opposed the more stringent standard being applied to Carlisle, Barrow-in-Furness, Workington and Whitehaven.</p> <p>Cumbria County Council remains of the view that rural communities still need to gain access to employment, shopping and other services in these Key Service Centres, and the higher car parking standard applied to them would hinder accessibility to such services for the rural populace in the County. The higher car parking standard would be more appropriate to the metropolitan areas of the North West than Cumbria. An extremely sparse population and widely dispersed settlement patterns make public transport uneconomic and consequently car dependency is high by national standards.</p> <p>In line with the EIP Panel's report, GONW accepted changes to Policy RT3 – 'Public Transport Framework', which requires Local authorities to introduce measures to enhance the accessibility of the regional towns and cities, such as Carlisle, Barrow-in-Furness, Workington and Whitehaven. Cumbria County Council welcomed and supported this approach. However it was considered that this Policy should be applicable to all Key Service Centres in Cumbria, as defined in the adopted Cumbria and Lake District Joint Structure Plan.</p> <p>For the above reason, Cumbria County Council would not support keeping the standards as detailed in the Proposed Changes to RSS.</p> |
| Crewe and Nantwich Borough Council | No  |                         |                               |  |

## 1.2. What other policy changes are required to RSS to deliver this option and why?

| Organisation:  | 1.2. What other policy changes are required to RSS to deliver this option and why?  |
|--|---|
| National Trust   | No specific comments.   |
| Allerdale Borough Council                              | Not appropriate with this option.   |
| Lambert Smith Hampton                                  | None  |
| Emerson Group  | None, this represents a simple review exercise that can be achieved by minor changes and formal addition of bicycle and motorcycle parking standards. |
| Cumbria County Council / Cumbria Strategic Partnership | None, aside from amending the Proposed Changes to RSS in accordance with Cumbria County Council' submissions.   |

## 1.3. In taking forward this option, what are the implications for:

The table below shows the verbatim comments received. We have removed 27 blank responses.

| Organisation:             | 1.3. In taking forward this option, what are the implications for: |
|---------------------------|--|
| National Trust            | <b>A) Delivery:</b> No specific comments.                          |
|                           | <b>B) Infrastructure provision?</b> No specific comments.          |
|                           | <b>C) Community and social issues?</b> No specific comments.       |
|                           | <b>D) Environment?</b> No specific comments.                       |
|                           | <b>E) Economy?</b> No specific comments.                           |
| Allerdale Borough Council |  |
|                           |  |

| Organisation:         | 1.3. In taking forward this option, what are the implications for:  |
|-----------------------|---|
|                       | <p data-bbox="640 331 1527 432"><b>D) Environment?</b> The old standards do not sufficiently reflect real accessibility issues and therefore sometimes will not follow a truly sustainable line.</p> <p data-bbox="640 448 1527 675"><b>E) Economy?</b> A big issue for any local economy must be the consistent and fair application of car-parking standards, so that one settlement does not gain an advantage over another by pursuing more generous standards. Where, for instance, competing town centres are close together it is important to ensure one does not seek to gain an economic advantage by seeking more car-parking than its rival.</p>  |
| Lambert Smith Hampton | <p data-bbox="640 699 1527 762"><b>A) Delivery:</b> Car parking standards will remain inconsistent throughout the region and between different local authorities.</p> <p data-bbox="640 778 1527 874"><b>B) Infrastructure provision?</b> Inappropriate car parking provision will be provided across the borough, leading to congestion in the urban area.</p> <p data-bbox="640 890 1527 986"><b>C) Community and social issues?</b> On street car parking provision may be enhanced if insufficient car parking is provided according to the location of the site.</p> <p data-bbox="640 1002 1527 1042"><b>D) Environment?</b> Limited impact on the environment.</p> <p data-bbox="640 1058 1527 1121"><b>E) Economy?</b> Investment will not be encouraged into the region if the car parking standards are inappropriate for the area.</p> |
| Emerson Group         | <p data-bbox="640 1145 1527 1241"><b>A) Delivery:</b> No real change to existing. Additional requirements on space may, however reduce other elements of a development e.g. landscaping</p> <p data-bbox="640 1257 1527 1297"><b>B) Infrastructure provision?</b> None in particular.</p> <p data-bbox="640 1313 1527 1361"><b>C) Community and social issues?</b> Will assist in providing reasonable provision for visitors to uses such as clinics, nursing</p>  |

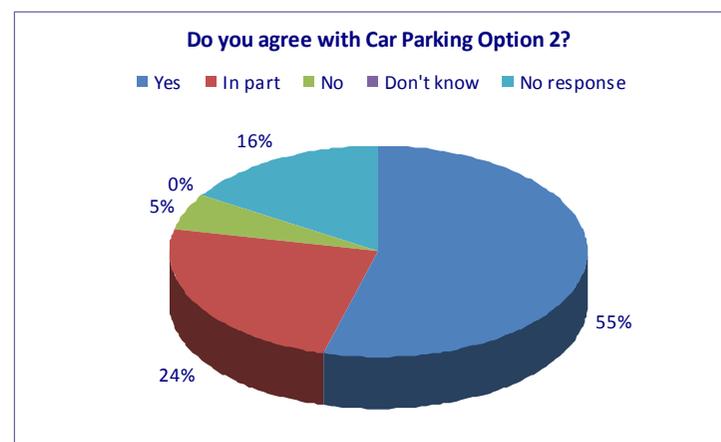
|  |   |
|--|---|
| <b>Organisation:</b>                                   | <b>1.3. In taking forward this option, what are the implications for:</b>   |
|  | homes etc.  |
|  | <b>D) Environment?</b> Minimal change.  |
|  | <b>E) Economy?</b> Supports existing users and viability of commercial and retail outlets.  |
| University of Cumbria                                  | <b>A) Delivery:</b> -   |
|  | <b>B) Infrastructure provision?</b> -   |
|  | <b>C) Community and social issues?</b> A tightening of restrictions placed on the parking standard in comparison to that laid out in PPG13 will disadvantage Higher and Further Education students in areas where public transport infrastructure is limited. Apart from the difficulties that this will cause such students in terms of physical access to their places of study, it will also lead to overspill parking where students (and staff) take up street parking spaces that would normally be used by residents. This has a negative impact on community relations for Higher and Further Education establishments. |
|  | <b>D) Environment?</b> -  |
|  | <b>E) Economy?</b> -  |
| Cumbria County Council / Cumbria Strategic Partnership | <b>A) Delivery:</b> It would otherwise lead to increased inflexible use of relatively higher car parking standards for Carlisle, Barrow-in-Furness, Workington and Whitehaven that would not adequately reflect local circumstances in Cumbria, and the higher dependency upon the use of the car due to the sparse nature of the county.   |
|  | <b>B) Infrastructure provision?</b> It may reduce the need to improve infrastructure provision for alternative means of transport. It would also lessen the amount of car parking provision in these Key Service Centres, which may then add to current levels of congestion.   |

|                      |  |
|----------------------|--|
| <b>Organisation:</b> | <b>1.3. In taking forward this option, what are the implications for:</b>  |
|                      | <p><b>C) Community and social issues?</b> The higher car parking standard would be likely to have an adverse effect upon local communities, especially in remoter rural locations, and their ability to have adequate access to social and community facilities within Carlisle, Barrow-in-Furness, Workington and Whitehaven.</p> <p><b>D) Environment?</b> The lack of sufficient car parking spaces could potentially increase congestion within the Key Service Centres of Carlisle, Barrow, Whitehaven, and Workington and thereby harm local urban pollution levels.</p> <p><b>E) Economy?</b> The higher car parking standards would undermine the attempts to regenerate the economies within Carlisle, Barrow-in-Furness, Workington and Whitehaven, as it would make them less attractive places in which to invest, and affect the ability to attract enhanced employment skills from within Cumbria.</p> |

## 2.1. Do you agree with Car Parking Option 2?

When asked, people told us;

| Do you agree with Car Parking Option 2? |           |
|---|-----------|
| Yes                                     | 22        |
| In part                                 | 9         |
| No                                      | 2         |
| Don't know                              | 0         |
| No response                             | 6         |
| <b>Total Responses</b>                  | <b>39</b> |



The table below shows the verbatim comments received. We have removed 24 blank responses.

The table below shows the verbatim comments received. We have removed 2 blank responses.

| <b>Organisation:</b>         | <b>2.1. Do you agree with Car Parking Option 2?</b> | <b>2.1a. If so why?</b>  | <b>2.1b. If not, why not?</b> | <b>2.1c. Please explain your answer to the previous question.</b> |
|------------------------------|---|--|-------------------------------|---|
| Macclesfield Borough Council | In part   | Option 2 sets out a more comprehensive and appropriate range of parking standards for developments and is therefore preferable to option 1. Both options set out maximum parking standards, but there are certain arguments for the introduction of minimum parking standards, particularly for residential developments. Macclesfield has high levels of car ownership, and it is also important to recognise the difference between car ownership and car usage. Car parking requirements for residential developments are a reflection of car ownership, and not necessarily of car usage. In fact, reducing car usage is likely to result in an increase in the requirement for residential parking if car ownership remains the same. Whilst it is acknowledged that the introduction of specific minimum standards would be contrary to national policy in PPG13: Transport, some acknowledgement in the revised RSS that Local Planning Authorities could require a certain minimum level of parking provision for residential schemes where appropriate and necessary would be welcomed. |                               |   |
| Individual response          | Yes   | Option 2 is the better option because of its flexibility Points 1. Note that A3 and A4 have the same allocations which no doubt reflects the fact that the line between restaurants and public houses is blurred given that many provide both a bar and a restaurant. There appears to be no mention of A5,  |                               |   |

| Organisation:                         | 2.1. Do you agree with Car Parking Option 2? | 2.1a. If so why? | 2.1b. If not, why not? | 2.1c. Please explain your answer to the previous question.   |
|---------------------------------------|--|------------------|------------------------|--|
|                                       |  |                  |                        | <p>takeaway use, as a separate category. My view is that the category should still exist so that a change of use, requiring planning permission, is needed for such premises. I welcome the comment that on street parking controls should be considered, stronger wording would be better given the problems that take-aways can cause communities. 2. In practice parking provision is often far less than the maximum because of the policy of shared parking. This is a policy that works well up to a point but beyond that can drive customers out of village and town centres to provision further afield that has large free car parks. The law of unintended consequences means that there are more and longer journeys being made because the alternatives are being clamped, risking prosecution through parking illegally, or driving round in circles for some time. This is of course a Development Control issue but nevertheless how policies work in practice should be considered.</p> |
| Northwest Regional Development Agency | No   |                  |                        | <p>Option 2 proposes that the revised parking standards developed by Mouchel are 'adopted'. We presume this means that they would be subject to further consultation when the Partial Review is submitted for examination. A further option, which has not been considered, is to ask whether RSS should continue to set out regional parking standards or whether these might more usefully be agreed at city region or sub regional level.</p>   |
| GONW                                  | Yes  |                  |                        | <p>It is considered that the new standards in option 2 are more consistent with PPG13. Given that the standards are based on the different categorisations of areas is it clear how these fit with the locations as set out in RDF1. Will it be clear which type of standard applies where given that the categorisation used in the policy does not clearly apply to the way</p>  |

| <b>Organisation:</b>  | <b>2.1. Do you agree with Car Parking Option 2?</b> | <b>2.1a. If so why?</b>   | <b>2.1b. If not, why not?</b> | <b>2.1c. Please explain your answer to the previous question.</b> |
|---|---|---|-------------------------------|---|
|   |   | settlements are categorised in the plan   |                               |   |
| Preston City Council  | Yes   | Preston City Council would support Option 2 on car parking but has no particularly strong view.   |                               |   |
| Halton Borough Council  | Yes   | The accessibility tool and standards table should help to ensure a common approach across the region to the development of parking policy. It would help with resources to have a regional parking standard that could be adopted as an SPD as it stands (including having been put through a sustainability appraisal). Doing this would improve consistency between neighbours.   |                               |   |
| National Trust  | Yes   | It is appropriate to up-date the standards to reflect the new research that has been undertaken.  |                               |   |
| South Lakeland District Council Development Plans Team                | Yes   | OPTION 2: ADOPT THE REVISED STANDARDS SET OUT IN THE CONSULTANTS REPORT We support the adoption of revised car parking standards; on the basis they are underpinned by a robust evidence base study.  |                               |   |
| Cheshire West and Chester (comments represent informal officer views) | Yes   | The proposed car parking standards outlined by the consultants present a positive way forward in enabling a regional overview of parking provision to be created while allowing Local Authorities to tailor the precise standards to meet their local needs. The linking of parking provision to accessibility as opposed simply to the land use is a positive approach. However, the increased number of land use definitions, while helpful, is likely to generate a greater number of options which will result in greater complexity in interpretation. |                               |   |
| Lancashire County Council   | Yes   | The revised parking standards are supported for the reasons set out in section 2 of the consultation paper  |                               |   |

| <b>Organisation:</b>      | <b>2.1. Do you agree with Car Parking Option 2?</b> | <b>2.1a. If so why?</b> | <b>2.1b. If not, why not?</b> | <b>2.1c. Please explain your answer to the previous question.</b>  |
|---------------------------|---|-------------------------|-------------------------------|--|
| Merseyside Policy Unit    | Yes   |                         |                               | The accessibility tool and standards table are transparent and should help to ensure a common approach across the region to the development of parking policy.   |
| Allerdale Borough Council | In part   |                         |                               | The proposed standards are broadly supportable. However, we are concerned about how they will be applied. It is proposed to apply an accessibility questionnaire to most development proposals no matter of what scale, with few exceptions. With the ever increasing burdens for information required to assess applications there is a case for applying a scale threshold to the use of the questionnaire. We also object to the Area Accessibility Categories as defined in the consultation literature. This suggests that the categories are simply linked to the settlement hierarchy in the Regional Spatial Framework, if so, why is an accessibility questionnaire proposed? We consider that the area categories should be solely linked to accessibility criteria and not to the hierarchy. There may be a case in areas where there are a number of towns close together (or when considering small scale development), for the standards applied to be informed by the hierarchy, but in rural and remote areas the sole determinant should be accessibility. Accessibility should be the starting point in all proposals. Because of its importance, the contents of the accessibility questionnaire should be subject to consultation. |
| Haslington Parish Council | In part   |                         |                               | Satisfies the requirement to review requirements. Can work with a minimum standard of provision but do not agree with the proposal for maximum values. Maximum values should be constrained by economic factors e.g. land values and developers requirements. Limiting houses to only 2 or 3 car parking places WILL lead to parking on estate roads or outside neighbouring/older properties – leading to bad   |

| <b>Organisation:</b>                                     | <b>2.1. Do you agree with Car Parking Option 2?</b> | <b>2.1a. If so why?</b>   | <b>2.1b. If not, why not?</b> | <b>2.1c. Please explain your answer to the previous question.</b> |
|--|---|---|-------------------------------|---|
|  |   | neighbour and security issues – accept the need for minimum but not maximum provision. Rural areas are increasingly isolated from shopping, educational and medical facilities the need for independent transportation is increasing – notwithstanding the increased cost of fuel. The renewed/recent trend to amalgamation of schools and PFI medical centres increasingly puts the rural community at a disadvantage. Residential development in rural areas need minimum but no maximum values for car parking provision.                            |                               |   |
| Stockport Metropolitan Borough Council                   | In part   | Stockport Council supports the submission made by AGMA and has a number of additional comments.   |                               |   |
| Carlisle City Council                                    | In part   | The accessibility areas suggested in the RSS consultation paper are an improvement on those in the consultant's report but there are concerns if there were to be any further changes through the RSS review process  |                               |   |
| Lambert Smith Hampton                                    | Yes   | In general the revised standards set out in the consultants report are welcomed. It will ensure consistency throughout the region. However, for clarity a definition should be provided as to what Area A, B and C incorporate. It should also be noted that the regional parking standards do not attempt (and should not attempt) to categorise every individual location in the region. It is the role of each local authority to divide all areas within their boundaries into the three area accessibility categories, for the avoidance of doubt. |                               |   |
| AGMA (the Association of Greater Manchester Authorities) | Yes   | AGMA's preference would be for Option 2, subject to clarification of a number of issues. The revised standards were prepared in line with Draft RSS; in advance of the Panel Report (following the Examination in Public) and the Government's Proposed Changes. In the light of these  |                               |   |

| <b>Organisation:</b>               | <b>2.1. Do you agree with Car Parking Option 2?</b> | <b>2.1a. If so why?</b>  | <b>2.1b. If not, why not?</b> | <b>2.1c. Please explain your answer to the previous question.</b> |
|------------------------------------|---|--|-------------------------------|---|
|                                    |   | changes the links between key RSS policies and the new parking standards need to be reviewed, in particular how they will operate as part of the regional spatial framework given the removal from the policies of a settlement hierarchy. AGMA would wish to have the opportunity to comment in much greater detail on the proposed revised standards, since this consultation on broad options does not appear to permit this.   |                               |   |
| GVA Grimley (on behalf of Goodman) | In part   | Parking numbers should be reviewed every 5 years in line with the commitment outlined in RPG13. However, the Area Accessibility Categories which have been used to identify different levels of parking provision need to be revisited as these do not fairly reflect accessibility levels. Categories B and C should cover more of the region than they currently do with Category A only applying to city centres.   |                               |   |
| Emerson Group                      | In part   | The use of the accessibility assessments and the multiple sub division of locations is an unnecessary and complex proposal that is time consuming, confusing and an exercise in time wasting for all concerned. The proposals are similar to the existing in many respects, taking aside the over complications mentioned above. As a result the need for change is minimal. The standards for retail warehouses are far too low and should be closer to non food retail. The standard for A2 seems about right. Those for C2 uses seem to be the wrong way round as less accessible locations by other means than the car have fewer spaces! The standard for housing appears reasonable as do those for D1 and sui generis uses. Disagree strongly with charging for retail developments as this will depress trade and is an admission that insufficient parking is provided for town and district centre locations. Pedantic adherence to the proposed |                               |   |

| Organisation:           | 2.1. Do you agree with Car Parking Option 2? | 2.1a. If so why?   | 2.1b. If not, why not? | 2.1c. Please explain your answer to the previous question. |
|-------------------------|--|--|------------------------|--|
|                         |  | parking management and design suggestions will be anti competitive and fail to take account of individual circumstances. Travel plans will not be viable or logical in some instances. Agree they should be provided on larger developmnets, possibly using the PPG 13 thresholds but not smaller A2, B1, C1, C2 and D1 users.   |                        |  |
| Chorley Council         | Yes  | Support Option 2 in principle but await the Consultant's report before an ultimate commitment  |                        |  |
| Wirral MBC              | Yes  | The proposed approach is more comprehensive and is likely to be more sensitive to local circumstances. The work better reflects the type of approach already being followed under the auspices of the Merseyside LTP. The sustainability apraisal shows that it will perform better than the existing standards.   |                        |  |
| University of Cumbria   | Yes  | Use of Area Accessibility Categories, and differentiation in their parking standards, will allow for more equitable standards to be applied across the region in accordance with local variations in accessibility. This solution is more appropriate for Cumbria which, being a large county with a less dense and more dispersed population, doesn't have the public transport infrastructure of the city regions. |                        |  |
| Congleton.gov.uk        | Yes  | It is considered that option 2 sets out a more comprehensive and appropriate range of parking standards for development.   |                        |  |
| NW Transport Roundtable | In part                                      | The car parking review failed to consider parking at railway stations and park & ride sites and these issues should have been part of the overall 'mix'.   |                        |  |
| Highways Agency         | Yes  | In order to better align with current land use classification and strengthen / support application of travel demand management in a consistent manner across the region. This  |                        |  |

| <b>Organisation:</b>  | <b>2.1. Do you agree with Car Parking Option 2?</b> | <b>2.1a. If so why?</b>   | <b>2.1b. If not, why not?</b> | <b>2.1c. Please explain your answer to the previous question.</b> |
|-----------------------|---|---|-------------------------------|---|
|                       |   | allows for / provides for an easy initial assessment of parking requirements to support formulation of development plans and review of planning applications. It could avoid the need for protracted debate at an inquiry in the absence of relevant advice on the matter of parking. It supports the efficient review of planning applications and reduces the potential for conflict / misunderstanding about parking standards at any public inquiry.  |                               |   |
| Cheshire East Council | Yes   |   |                               |   |
| Chester City Council  | Yes   | The proposed car parking standards outlined by the consultants present a positive way forward in enabling a regional overview of parking provision to be created while allowing Local Authorities to tailor the precise standards to meet their local needs. The linking of parking provision to accessibility as opposed simply to the land use is a positive approach, which reflects that taken by the Council in its adopted Supplementary Planning Guidance, 'Parking Provision within Developments in Chester' (2003). However, the increased number of land use definitions, while helpful, is likely to generate a greater number of options which will result in greater complexity in interpretation. |                               |   |
| CPRE North West       | Yes   | This is a much more sophisticated and nuanced tool that is more fit for purpose and more likely to achieve the aims for which maximum parking standards are intended. It is a much better complement to the spatial principles, spatial framework and policies RT2 & RT9 and better implements the aims of RSS. However, it should have been further improved by addressing parking at railway stations and park and ride sites. The standards for cycling spaces could also be more ambitious in order to better reflect the context of RSS policies.  |                               |   |

| <b>Organisation:</b>                                   | <b>2.1. Do you agree with Car Parking Option 2?</b> | <b>2.1a. If so why?</b> | <b>2.1b. If not, why not?</b> | <b>2.1c. Please explain your answer to the previous question.</b>   |
|--|---|-------------------------|-------------------------------|---|
| English Heritage                                       | In part   |                         |                               | It is essential that in implementing car parking provision this is undertaken in sensitive manner appropriate to the context. For example, the provision of semi-basement car parking in city centres has the potential to impact on archaeology and create inactive frontages unattractive to pedestrians and the street scene. The provision of surface car parks in historic centres has the potential to harm the character and appearance of the area. The inability or the inappropriateness of providing car parking should not be seen as a reason to resist the adaptive re-use of historic buildings. These issues should be referred to in the interpretation of the car parking standards.  |
| Dalton Hall Business Centre                            | No  |                         |                               | Poor public transport in rural areas means people depend on their cars and need car parking spaces  |
| Cumbria County Council / Cumbria Strategic Partnership | Yes   |                         |                               | <p>The revised standards and methodology enables both location and accessibility to be taken into account and therefore provides a more flexible and appropriate parking provision to be achieved than applying a uniform standard.</p> <p>It is noted that the car parking standards applicable to Area Type C in Table 2 are virtually the same as those contained in Policy T32 – ‘Car Parking Standards’ in the adopted Cumbria and Lake District Joint Structure Plan 2001-2016. It is considered that the higher standards in Area Type A and B are also appropriate in highly accessible locations.</p> <p>Section 6 of the consultants - Mouchel - report (2007) sets out how the different Area Type car parking standard could be applied in respect of:</p> <ul style="list-style-type: none"> <li>• metropolitan areas,</li> <li>• non-metropolitan areas, and</li> </ul> |

| <b>Organisation:</b>               | <b>2.1. Do you agree with Car Parking Option 2?</b> | <b>2.1a. If so why?</b> | <b>2.1b. If not, why not?</b> | <b>2.1c. Please explain your answer to the previous question.</b>  |
|------------------------------------|---|-------------------------|-------------------------------|--|
|                                    |   |                         |                               | <ul style="list-style-type: none"> <li>• other rural areas.</li> </ul> <p>If this were applied too rigidly in terms of relating towns and cities within Cumbria to within those 3 specific definitions, it could lead to the same concerns expressed above about the car parking standards identified in Policy RT3 in the current Proposed Changes to RSS. However, Table 6.2 and Figure 6.5 provide clarity with regards where the 3 area type standards should be applied and the impact of accessibility on the overall provision.</p> |
| Crewe and Nantwich Borough Council | Yes   |                         |                               | It is considered that option 2 sets out a more comprehensive and appropriate range of parking standards for development.   |

## 2.2. What other policy changes are required to RSS to deliver this option and why?

The table below shows the verbatim comments received. We have removed 16 blank responses.

| <b>Organisation:</b>   | <b>2.2. What other policy changes are required to RSS to deliver this option and why?</b>   |
|------------------------|---|
| Preston City Council   |   |
| Halton Borough Council | It is crucial that the broad locations for development, particularly housing and commercial, are sustainable in transport terms. The effectiveness of the proposed parking policies will be undermined if the broad locations are not able to support and deliver sustainable transport options and travel choices. |
| National Trust         | None specifically noted.  |

| Organisation:                          | 2.2. What other policy changes are required to RSS to deliver this option and why?   |
|--|--|
| Merseyside Policy Unit                 | It is crucial that the broad locations for development, particularly housing and commercial, are sustainable in transport terms. The effectiveness of the proposed parking policies will be undermined if the broad locations are not able to support and deliver sustainable transport options and travel choices.  |
| Allerdale Borough Council              | This option needs to be amended to be more sensitive locally, and in terms of the scale of proposals. There may also be a case for allowing flexibility in an area where the local economy is fragile (RPAs?) or in a town with particular economic problems which might not be reflected in the town's accessibility score.   |
| Haslington Parish Council              | Residential development in rural areas need minimum but no maximum values for car parking provision. Standards should not be driven by a city view of the region – need to avoid the increasing domination of Manchester and Liverpool on the regions policies – they do not represent the views and needs of the rural community. Encourage provision of parking for shops, pubs, restaurants as FREE shared/public parking space to allow multiple use through the day by different types of user. Encourage use of school parking provision by other users outside school hours at NO CHARGE.   |
| Stockport Metropolitan Borough Council | Parking standards would be strongly dependent on travel plans, accessibility improvements and demand management. There are resourcing issues in applying or checking complex calculations / questionnaires for parking provision for each application. Most developments do not require Transport Assessments or Transport Statements to be prepared by consultants who could do the calculations. Applying a formula would be an additional burden for most of the developers that local authorities deal with. All standards should relate to gross floor area or numbers of dwellings, as this information is included in all applications. The standards divide B2 and B8 into different categories even though most applications for units are generally 'B2/B8' as for spec built units the developer doesn't know what tenant they are he is going to get. Similarly division of A1 from A2 will be difficult, if not impossible to manage as they are generally interchangeable uses. Applying maximum parking standards to a car showroom would be unworkable. Some of the differences between zones do not seem as if they will make a great deal of difference to reducing car usage but do add further complication to the |

| Organisation:  | 2.2. What other policy changes are required to RSS to deliver this option and why?  |
|--|---|
|  | <p>process There is considerable potential for parking standards to present perverse incentives for developers to consider first those sites where the parking allocation could be maximised, rather than those sites with maximum existing accessibility. The advantages of providing additional parking facilities close to railways should be highlighted. In respect of cycling standards a distinction is needed between long and short – term parking; employees require more secure cycle parking than someone who is ‘popping in’ to a shop for 10 minutes. The biggest failing of many developments currently is the siting of cycle facilities. A first consideration should be its inclusion into the main fabric of the development. If cycle parking is to be physically separate from this, the early identification of its location should be a priority, and precede that of non – disabled car parking spaces. On no account should the location of cycle parking be decided once the general parking layout has been decided. Making this clear at the Regional level will enhance the ability of councils to achieve better cycle parking provision.</p> |
| Lambert Smith Hampton                                    | <p>Policy RT2 should be amended to incorporate the parking standards as recommended by Mouchel. The policy should identify the broad locations for the specific car parking standards, but acknowledge the role of each authority to divide all areas within their boundaries into the three accessibility categories.</p>  |
| AGMA (the Association of Greater Manchester Authorities) | <p>Government guidance stresses the importance of decisions about housing growth being underpinned by evidence that the growth can be delivered through adequate infrastructure provision. The revised car parking standards are the only aspect of transport policy in Draft RSS to be covered in the Partial Review. It is a matter of considerable concern that the impacts on transport infrastructure requirements of the options for major housing growth are not being considered.</p>   |
| GVA Grimley (on behalf of Goodman)                       | <p>It needs to be recognised that parking ratios which are suitable for city centres and their immediate surroundings are not always suitable for areas on the edge of large metropolitan areas. Ratios which are appropriate for city centres should only be applied in areas with significant public transport facilities, otherwise development opportunities may be restricted.</p>   |

| <b>Organisation:</b>                                   | <b>2.2. What other policy changes are required to RSS to deliver this option and why?</b>  |
|--|--|
| Emerson Group  | Should be no need for any significant changes  |
| Wirral MBC   | Consistency across sub-regions should be promoted  |
| NW Transport Roundtable                                | Reductions in car use will not be achieved through car parking standards. The need is to revise the entire RSS & RTS (inc. the RFA recommendations) to deliver better public transport, more smart choices and less road building. |
| Highways Agency  | Policy RDF1 should recognise that LDFs need to define those towns and cities anticipated in Area Type A, B and C. Maybe a need to mention parking standards in Policy L4 Housing   |
| CPRE North West  | No other policy changes are required to deliver this option.   |
| Dalton Hall Business Centre                            | better provision of public transport in rural areas  |
| Cumbria County Council / Cumbria Strategic Partnership | None   |

### 2.3. In taking forward this option, what are the implications for:

The table below shows the verbatim comments received. We have removed 18 blank responses.

| <b>Organisation:</b>   | <b>2.3. In taking forward this option, what are the implications for:</b>  |
|------------------------|--|
| Halton Borough Council | <b>A) Delivery:</b> Ensuring that all authorities understand the policy direction and the application of the tool through planning decision-making.  |
|                        | <b>B) Infrastructure provision?</b> The policy should contribute to elevating the quality of new developments, from an urban design and sustainability perspective. The site and the development will be able to contribute to a more sustainable built environment that makes a positive infrastructure intervention. |

|                      |   |
|----------------------|---|
| <b>Organisation:</b> | <b>2.3. In taking forward this option, what are the implications for:</b>   |
|                      | <p><b>C) Community and social issues?</b> The support for sustainable transport modes and travel choices will enable social transport barriers to accessing opportunities, essential services and facilities to be removed. The ability to access new developments by a range of modes is crucial for linking areas of need and opportunity, and ensuring that all in the community have the opportunity to be fully involved in society and benefit from the full range of opportunities available.</p> <p><b>D) Environment?</b> A more carbon efficient transport system that contributes to climate change mitigation and adaptation. Air and noise quality improvements. Urban design and townscape improvements. Landscape enhancement through the alternative uses of land for vehicular parking provision.</p> <p><b>E) Economy?</b> More energy and space efficient developments that are able to maximise economic growth through the full utilisation of the developments footprint for intended economic purposes. Increased ability to attract and retain the required workforce for economic growth and prosperity. Increase the number of people contributing to the economy through their ability to access employment. Enhanced demand management will result in less congestion and associated economic gains through travel time savings, predictability and improved efficiencies of the transport network.</p> |
| National Trust       | <p><b>A) Delivery:</b> Ensure followed up in LDF work and that the approach is consistently applied, in accordance with the Table, across the Region – the importance of joint working between LPAs to ensure a consistent approach is also essential.</p> <p><b>B) Infrastructure provision?</b> o specific comments.</p> <p><b>C) Community and social issues?</b> o specific comments.</p> <p><b>D) Environment?</b> Consideration will need to be given to the impact upon sensitive locations and in particular those that are</p>   |

|                        |   |
|------------------------|---|
| <b>Organisation:</b>   | <b>2.3. In taking forward this option, what are the implications for:</b>   |
|                        | <p>important for tourism. It is considered that this matter is appropriately addressed at section 9.4 of the Mouchel Report; however, it is noted that no specific recommendation for "historic and environmentally sensitive locations" is set out and this is a matter that should be addressed in the draft revisions to RSS.</p> <p><b>E) Economy?</b> o specific comments.</p>   |
| Merseyside Policy Unit | <p><b>A) Delivery:</b> Ensuring that all authorities understand the policy direction and the application of the tool through planning decision making.</p> <p><b>B) Infrastructure provision?</b> The policy should contribute to elevating the quality of new developments, from an urban design and sustainability perspective. The site and the development will be able to contribute to a more sustainable built environment that makes a positive infrastructure intervention.</p> <p><b>C) Community and social issues?</b> The support for sustainable transport modes and travel choices will enable social transport barriers to accessing opportunity and essential services and facilities to be removed. The ability to access new developments by a range of modes is crucial for linking areas of need and opportunity, and ensuring that all in the community have the opportunity to be fully involved in society and benefit from the full range of opportunities available.</p> <p><b>D) Environment?</b> A more carbon efficient transport system that contributes to climate change mitigation and adaptation. Air and noise quality improvements. Urban design and townscape improvements. Landscape enhancement through the alternative uses of land for vehicular parking provision.</p> <p><b>E) Economy?</b> More energy and space efficient developments that are able to maximise economic growth through the full utilisation of the developments footprint for intended economic purposes. Increased ability to attract and retain the required workforce for</p> |

| Organisation:             | 2.3. In taking forward this option, what are the implications for:   |
|---------------------------|--|
|                           | economic growth and prosperity. Increase the number of people contributing to the economy through their ability to access employment. Enhanced demand management will result in less congestion and associated economic gains through travel time savings, predictability and improved efficiencies of the transport network.  |
| Allerdale Borough Council | <p><b>A) Delivery:</b> The process of delivering the standards needs more clarity. In particular, the respective roles of the settlement hierarchy and the area accessibility questionnaires in applying the standards need to be spelled out. There needs to be some flexibility/local discretion in applying the standards in areas which are remote or in towns experiencing economic difficulties.</p> <p><b>B) Infrastructure provision?</b> NA</p> <p><b>C) Community and social issues?</b> NA</p> <p><b>D) Environment?</b> Tying the standards to accessibility should ensure a broadly sustainable policy but there may be local justification for flexibility.</p> <p><b>E) Economy?</b> Fragile or poor economic performance may be a justification for local flexibility.</p> |
| Haslington Parish Council | <p><b>A) Delivery:</b> Standards should not be driven by a city view of the region – need to avoid the increasing domination of Manchester and Liverpool on the regions policies – they do not represent the views and needs of the rural community.</p> <p><b>B) Infrastructure provision?</b> Residential development in rural areas need minimum but no maximum values for car parking provision. Standards should not be driven by a city view of the region – need to avoid the increasing domination of Manchester and Liverpool on the regions policies – they do not represent the views and needs of the rural community.</p> <p><b>C) Community and social issues?</b> Residential development in</p>  |

|  |  |
|--|--|
| <b>Organisation:</b>                   | <b>2.3. In taking forward this option, what are the implications for:</b>  |
|  | <p>rural areas need minimum but no maximum values for car parking provision. Standards should not be driven by a city view of the region – need to avoid the increasing domination of Manchester and Liverpool on the regions policies – they do not represent the views and needs of the rural community.</p> <p><b>D) Environment?</b> Ensure that car parking provision is designed to absorb rain water to avoid flooding issues.</p> <p><b>E) Economy?</b> Maximum parking provision should be limited only by customer/developer financial constraints not direct regional policy.</p>   |
| Stockport Metropolitan Borough Council | <p><b>A) Delivery:</b> The resourcing of this is potentially problematic for local authorities. As this stands a key concern is that the standards are complicated for both developers and the public to understand, to the extent that dealing with this would put an additional strain on resources.</p> <p><b>B) Infrastructure provision? -</b></p> <p><b>C) Community and social issues? -</b></p> <p><b>D) Environment? -</b></p> <p><b>E) Economy? -</b></p>  |
| Carlisle City Council                  | <p><b>A) Delivery:</b> Accessibility areas would have to be clearly defined at the local level to deliver differing standards for city centre, district and local centres and a consistent approach may be useful. Removal of the suburban reference to category C rather than B is more appropriate for regional towns and cities with a large rural hinterland. Due to business and social interactions and lack of appropriate rural transport car ownership is still required which impacts on design and layout of development. Reducing parking spaces does not reduce ownership and impacts on design of a scheme and inappropriate parking affecting safety of other road users and emergency/service vehicles</p> |

|                       |  |
|-----------------------|--|
| <b>Organisation:</b>  | <b>2.3. In taking forward this option, what are the implications for:</b>  |
|                       | <b>B) Infrastructure provision? -</b>  |
|                       | <b>C) Community and social issues? -</b>   |
|                       | <b>D) Environment? -</b>   |
|                       | <b>E) Economy? -</b>   |
| Lambert Smith Hampton | <b>A) Delivery:</b> If the RSS adopts the revised car parking standards then the local authorities will have to be in general conformity with it. As such, the relevant car parking standards should be delivered.   |
|                       | <b>B) Infrastructure provision?</b> The car parking infrastructure should be provided that conforms with the car parking standards.  |
|                       | <b>C) Community and social issues?</b> Less potential for on-street parking within new developments.   |
|                       | <b>D) Environment? -</b>   |
|                       | <b>E) Economy?</b> Investment should be encouraged throughout the region with this option as the car parking standards are more realistic.   |
| AGMA                  | <b>A) Delivery:</b> Government guidance stresses the importance of decisions about housing growth being underpinned by evidence that the growth can be delivered through adequate infrastructure provision. The revised car parking standards are the only aspect of transport policy in Draft RSS to be covered in the Partial Review. It is a matter of considerable concern that the impacts on transport infrastructure requirements of the options for major housing growth are not being considered. |
|                       | <b>B) Infrastructure provision?</b> Government guidance stresses the importance of decisions about housing growth being underpinned by evidence that the growth can be delivered through adequate infrastructure provision. The revised car parking standards are the only aspect of transport policy in Draft RSS to be covered in the Partial Review. It is a matter of considerable concern that the  |

|                      |   |
|----------------------|---|
| <b>Organisation:</b> | <b>2.3. In taking forward this option, what are the implications for:</b>   |
|                      | <p>impacts on transport infrastructure requirements of the options for major housing growth are not being considered.</p> <p><b>C) Community and social issues?</b> See a) above Government guidance stresses the importance of decisions about housing growth being underpinned by evidence that the growth can be delivered through adequate infrastructure provision. The revised car parking standards are the only aspect of transport policy in Draft RSS to be covered in the Partial Review. It is a matter of considerable concern that the impacts on transport infrastructure requirements of the options for major housing growth are not being considered.</p> <p><b>D) Environment?</b> Government guidance stresses the importance of decisions about housing growth being underpinned by evidence that the growth can be delivered through adequate infrastructure provision. The revised car parking standards are the only aspect of transport policy in Draft RSS to be covered in the Partial Review. It is a matter of considerable concern that the impacts on transport infrastructure requirements of the options for major housing growth are not being considered.</p> <p><b>E) Economy?</b> Government guidance stresses the importance of decisions about housing growth being underpinned by evidence that the growth can be delivered through adequate infrastructure provision. The revised car parking standards are the only aspect of transport policy in Draft RSS to be covered in the Partial Review. It is a matter of considerable concern that the impacts on transport infrastructure requirements of the options for major housing growth are not being considered.</p> |
| Wirral MBC           | <p><b>A) Delivery:</b> Delivery is likely to be better supported where the new standards can be shown to fully reflect the actual accessibility of individual sites.</p> <p><b>B) Infrastructure provision? -</b></p>   |

|                       |   |
|-----------------------|---|
| <b>Organisation:</b>  | <b>2.3. In taking forward this option, what are the implications for:</b>   |
|                       | <b>C) Community and social issues? -</b>  |
|                       | <b>D) Environment? -</b>  |
|                       | <b>E) Economy? -</b>  |
| University of Cumbria | <b>A) Delivery: -</b>   |
|                       | <b>B) Infrastructure provision? -</b>   |
|                       | <b>C) Community and social issues?</b> This approach will enable students who live in areas poorly served by public transport appropriate physical access to their places of study and help minimise on-street parking.   |
|                       | <b>D) Environment? -</b>  |
|                       | <b>E) Economy? -</b>  |
| Highways Agency       | <b>A) Delivery:</b> Standards need to be embedded in LDFs and applied by local planning authorities. The application of standards needs to be assessed as part of a review of LDFs & monitored (perhaps as part of the RSS monitoring plan)   |
|                       | <b>B) Infrastructure provision?</b> There maybe a greater priority given to / investment in public transport improvements / demand management technology measures.  |
|                       | <b>C) Community and social issues?</b> Stricter off-highway parking standards at development may lead to greater amount of on-street parking : particularly migration from centres to adjacent residential areas. Need to consider the potential impact of land-use decisions as part of the formulation of LDFs and develop / adopt appropriate on-street parking strategy where necessary eg Residential Car Parking Zones. |
|                       | <b>D) Environment?</b> Maybe possible to calculate / assess CO2 emissions saved as part of evidence base for EA of taking forward parking standards under Option 2 compared with Option 1.  |

|                      |  |
|----------------------|--|
| <b>Organisation:</b> | <b>2.3. In taking forward this option, what are the implications for:</b>  |
|                      | <b>E) Economy?</b> Option 2 needs to form part of a broad, aligned transport / spatial strategy to address / respond to concerns about potential detrimental impact of congestion on regeneration / economic growth aspirations.   |
| CPRE North West      | <p><b>A) Delivery:</b> This option will improve the delivery of RSS aims to reduce the level of traffic growth, manage travel demand and reduce reliance on the private car, with all the concomitant social ,economic and environmental benefits that achieving those aims will bring.</p> <p><b>B) Infrastructure provision?</b> By reducing reliance on the private car, this option should reduce pressure for the development of extra highway capacity. It may increase pressure for the improvement of public transport services and walking and cycling infrastructure, and such improvements are called for by other RSS policies.</p> <p><b>C) Community and social issues?</b> If this option reduces reliance on the private car and therefore contributes to reducing traffic, etc, affected communities will benefit from relatively improved air quality, noise levels, local environmental quality, safer roads, reduced congestion, etc.</p> <p><b>D) Environment?</b> If this option reduces reliance on the private car and therefore contributes to reducing traffic, etc, there will be reductions in air pollution and carbon emissions.</p> <p><b>E) Economy?</b> If this option reduces reliance on the private car and therefore contributes to reducing traffic, etc, reduced levels of congestion will deliver economic benefits.</p> |
| English Heritage     | <p><b>A) Delivery:</b> -</p> <p><b>B) Infrastructure provision?</b> -</p> <p><b>C) Community and social issues?</b> -</p>  |

|   |  |
|---|--|
| <b>Organisation:</b>                                      | <b>2.3. In taking forward this option, what are the implications for:</b>  |
|   | <p><b>D) Environment?</b> It is essential that in implementing car parking provision this is undertaken in sensitive manner appropriate to the context. For example, the provision of semi-basement car parking in city centres has the potential to impact on archaeology and create inactive frontages unattractive to pedestrians and the street scene. The provision of surface car parks in historic centres has the potential to harm the character and appearance of the area. The inability or the inappropriateness of providing car parking should not be seen as a reason to resist the adaptive re-use of historic buildings. These issues should be referred to in the interpretation of the car parking standards.</p> |
| Cumbria County Council /<br>Cumbria Strategic Partnership | <b>E) Economy?</b> -   |
|   | <p><b>A) Delivery:</b> If applied too rigidly and inflexibly, the option may otherwise lead to increased inflexible use of relatively higher car parking standards for Carlisle, Barrow-in-Furness, Workington and Whitehaven and perhaps other higher order settlements such as Penrith and Kendal that would not adequately reflect local circumstances in Cumbria, and the generally higher dependency upon the use of the car due to the sparse nature of the county.</p>  |
|   | <b>B) Infrastructure provision?</b> None   |
|   | <p><b>C) Community and social issues?</b> The suggested higher car parking standard could have an adverse effect upon local communities, especially in remoter rural locations, and their ability to have adequate access to social and community facilities within Carlisle, Barrow-in-Furness, Workington and Whitehaven.</p>  |
|   | <b>D) Environment?</b> None  |
| <b>E) Economy?</b> None                                   |  |

# **Appendix One – Parking Standards Options**

# Questions for the Options for Consultation on the Regional Spatial Strategy – Car Parking Standards

## Section 1: Issues to be addressed

What are the key issues that need to be considered for the Partial Review?

In March 2007, the North West Regional Assembly commissioned the consultants Mouchel to undertake a review of the North West Regional Parking Standards. The Regional Parking Standards, set out in the Regional Spatial Strategy, provide the framework for the identification at a local level of appropriate parking provision for new developments.

The current parking standards have remained unchanged since the publication of RPG13 in 2003 and an undertaking was given to review them within 5 years.

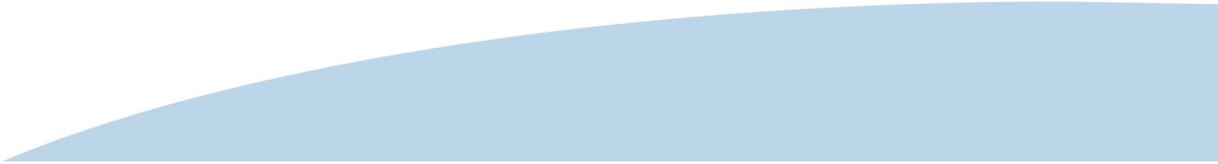
Consequently the North West Regional Assembly, as part of the Partial Review of the Regional Spatial Strategy is proposing a revised set of standards, with the consultants report providing the evidence base upon which the proposed regional parking standards will be based.

Mouchel used a qualitative approach throughout the study to review regional practice in the development and application of parking standards of all types. The consultants report provided recommendations for the maximum parking standards in addition to developing an accessibility based tool through which parking requirements for individual sites will be assessed. The study also includes standards or guidance for all vehicles including cycle, motorcycle, coach, HGV and disabled parking requirements in addition to provision for cars.

Engagement with regional stakeholders was a fundamental element of the process with a comprehensive consultation process ensuring the views of key organisations across the North West were taken into account in developing the proposed standards. A Project Advisory Group was created which allowed key stakeholders to review the study as it progressed as well as offering advice on how the guidance should be steered.

The final report can be downloaded at:

[http://www.nwra.gov.uk/documents/?page\\_id=4&category\\_id=205](http://www.nwra.gov.uk/documents/?page_id=4&category_id=205)



*Links with other Policy Areas*

**Policy DP1 – Spatial Principles** - In particular links to tackling climate change.

**Policy DP2 – Promote sustainable communities**

**Policy DP3 – Promote sustainable economic development**

**Policy DP5 – Manage travel demand; reduce the need to travel and increase accessibility.**

**Policy DP6 - Marry opportunity and need** - as success at achieving this will reduce the requirement for car parking.

**Policy DP7 – Promote Environmental Quality** - In particular managing traffic growth in order to mitigate the impacts of road traffic on air quality, noise and health.

**Policy DP9 – Reduce Emissions and adapt to climate change** - Focus on reducing carbon dioxide emissions from transport, in particular centring on car parking standards for residential and commercial development to reduce traffic growth.

**Policy RDF1 – Spatial Priorities** - In particular maximising the growth opportunities of Manchester, Liverpool and Central Lancashire to reflect their role as key economic drivers in the Region, their potential for enhanced economic growth, and their capacity to handle large scale new development in a sustainable way.

**Policy W1 – Strengthening the Regional Economy** - Ensuring the safe, reliable and effective operation of the region's transport networks and infrastructure in accordance with the policies of the Regional Transport Strategy.

**Policy L4 – Regional Housing provision** - Relevant as parking standards now encompass new residential developments.

**Policy RT2 – Managing travel demand** - Parking controls considered in the effective reallocation of road space in favour of public transport, pedestrians and cyclists.

### **Regional Economic Strategy**

The latest Regional Economic Strategy was published in 2006.

## **Section 2: What has been decided**

The recommendations in the consultants report, in particular the numerical standards, have been benchmarked against existing practice at both a local level within the North West and at a regional level across the rest of the UK. The main outcome of the review



of parking standards has been the development of a more comprehensive regional policy with an accessibility tool and an expanded standards table.

The assessment tool enables account to be taken of accessibility both in terms of broad development locations and locally in the area immediately surrounding a development site. The broad development location is assessed through the allocation of the site into one of three Area Accessibility Categories (A, B or C) which provide the absolute maximum parking standards for different area types, whether it be a rural or urban location. A questionnaire is used to assess the accessibility of a development site which takes into account how easily it is accessed by different modes of transport. The score generated from the questionnaire is used to calculate the maximum parking standards.

The parking standards table has been significantly expanded from the existing table in RPG13 to take into account Use Classes Order, minimum parking standards for disabled drivers, bicycles, motorcycles, coaches as well as maximum standards for cars. The table also includes recommendations for residential developments.



## Section 3: Options for Consultation

### Option 1:

Keep existing parking standards as detailed in RPG13 and Draft RSS (see Table 1). This option would however fail to meet the commitment outlined in RPG13 to review parking standards every five years.

### Question 1

1.1. Do you agree with the above option?

Yes (go to 1a)

No (go to 1b)

1.1a. If so why?

1.1b. If not, why not?

1.2. What other policy changes are required to RSS to deliver this option and why?

1.3. In taking forward this option, what are the implications for:

- A) Delivery?
- B) Infrastructure provision?
- C) Community and social issues?
- D) Environment?
- E) Economy?

### Option 2:

Adopt the revised standards set out in the consultants report (see Table 2).

### Question 2

2.1. Do you agree with the above option?

Yes (go to 1a)



No (go to 1b)

2.1a. If so why?

2.1b. If not, why not?

2.2. What other policy changes are required to RSS to deliver this option and why?

2.3. In taking forward this option, what are the implications for:

- A) Delivery?
- B) Infrastructure provision?
- C) Community and social issues?
- D) Environment?
- E) Economy?



## Section 4: Sustainability Appraisal/ Habitats Regulations Assessment/ Equalities Impact Assessment/ Health Impact Assessment/ Rural Proofing considerations

Unlike other regions, the NW has not seen a reduction in the percentage of people using a car as the usual method of travel to work. More car commuters results in higher volumes of traffic and carbon emissions. Increasing provision of parking spaces per household is unlikely to reverse this trend, which needs to be taken in to account in supply of new housing (property size and location) and commuting, in addition to the location and scale of provision of affordable housing.

**Table 1 - existing parking standards as detailed in RPG13 and Draft RSS**

| <b>Existing Regional Parking Standards as set out in Draft RSS</b> |                    |  |   |
|--|--------------------|--|---|
| Land Use   | PPG 13             | Key Service Centres and Rural Areas <sup>6</sup>     | Regional Centres and Regional Towns and Cities <sup>6</sup> |
| <b>A1: Shops</b>   |                    |  |   |
| Food Retail  | 1 space per 14 sqm | 1 space per 14 sqm                                   | 1 space per 16 sqm  |
| Non-food Retail  | 1 space per 20 sqm | 1 space per 20 sqm                                   | 1 space per 22 sqm  |
| <b>A3: Food and Drink</b>  |                    |  |   |
| Restaurant   |                    | 1 space per 5 sqm of public floor area               | 1 space per 7 sqm of public floor area                      |
| Fast Food & Drive Through  |                    | 1 space per 7.5 sqm of gross floor area <sup>1</sup> | 1 space per 8.5 sqm of gross floor area <sup>1</sup>        |
| <b>B1: Business</b>  |                    |  |   |
| B1 including offices   | 1 space per 30 sqm |  |   |
| Stand alone offices  |                    | 1 space per 30 sqm                                   | 1 space per 35 sqm  |
| Business Parks   |                    | 1 space per 35 sqm                                   | 1 space per 40 sqm  |
| <b>B2: General Industry</b>  |                    |  |   |
| General Industry   |                    | 1 space per 45 sqm                                   | 1 space per 60 sqm  |
| <b>B8: Storage and Distribution</b>                                |                    |  |   |
| Storage and Distribution   |                    | 1 space per 45 sqm                                   | 1 space per 45 sqm  |
| <b>C1: Hotels and Hostels</b>                                      |                    |  |   |
| Hotels and   |                    | 1 space per bedroom                                  | 1 space per bedroom   |

|   |   |  |  |
|---|---|--|--|
| Hostels   |   | including staff <sup>3</sup>                   | including staff <sup>3</sup>                   |
| <b>D1: Non-Residential Institutions</b>   |   |  |  |
| Medical and Health facilities   |   | 1 space per 2 staff plus 4 per consulting room | 1 space per 2 staff plus 3 per consulting room |
| Higher and Further Education  | 1 space per 2 staff plus 1 per 15 students <sup>5</sup> | 1 space per 2 staff <sup>2,4</sup>             | 1 space per 2 staff <sup>2,4</sup>             |
| <b>D2: Assembly and Leisure</b>   |   |  |  |
| Cinemas and Conference Facilities   | 1 space per 5 seats                                     | 1 space per 5 seats                            | 1 space per 8 seats                            |
| Other leisure facilities  | 1 space per 22 sqm                                      | 1 space per 22 sqm                             | 1 space per 25 sqm                             |
| <b>Miscellaneous</b>  |   |  |  |
| Stadia  | 1 space per 15 seats                                    | 1 space per 15 seats                           | 1 space per 18 seats                           |
| <p><b>Notes:</b></p> <p>For predominantly drive-through/take-away establishments. For 'Drive-through' restaurants featuring significant seating then they should be considered as a conventional restaurant. To be backed up with a more detailed justification including 'Travel Plans' proposals. Additional facilities, such as leisure and conference facilities should be considered separately if appropriate.</p> <p>Parking for students should be included within this figure. Separate consideration would be required for any parking related to residential facilities.</p> <p>The standard for students relates to the total number of students attending an educational establishment rather than full-time equivalent number.</p> <p>These are defined in Table 1 of the Regional Development Framework (Chapter 7).</p> |   |  |  |

# Appendix Three - Category Definitions

## Review of Regional Car Parking Standards

Below is an explanation of the three Area Accessibility Categories as identified by the consultants Mouchel in the final parking standards report. The purpose of the three categories is to broadly group different areas according to their general levels of accessibility. It is accepted that, in comparison, accessibility in areas within Manchester and Liverpool city centres, for example, are significantly higher than in the centres of regional towns and cities. The proposed parking standards do not attempt to categorise every individual location in the region. Each local authority, while implementing standards, will divide all areas within their boundaries into the three Area Accessibility Categories. Therefore, local authorities will need to decide on the boundaries between different areas such as where the city centres finish and where the suburbs and wider urban areas begin.

### Area Accessibility Categories

| Area Accessibility Category | Locations  |
|-----------------------------|--|
| A                           | <ul style="list-style-type: none"> <li>▪ City and town centres in metropolitan areas,</li> <li>▪ Regional town and city centres</li> </ul>   |
| B                           | <ul style="list-style-type: none"> <li>▪ Non-metropolitan key service centre town centres</li> <li>▪ District or local centres in metropolitan areas</li> <li>▪ District or local centres in regional towns and cities.</li> </ul> |
| C                           | <ul style="list-style-type: none"> <li>▪ All other areas</li> </ul>  |

Liverpool and Manchester), the town centres in metropolitan areas (e.g. Bolton and Stockport town centres) and regional town and city centres (e.g. Crewe town centre and Preston city centre).

**Area Accessibility Category B** includes the town centres within non-metropolitan Key Service Centres (e.g. Wilmslow and Ormskirk); together with District or local centres in metropolitan areas and in regional towns and cities (i.e. not the main town or city centres but those serving local areas and neighbourhoods).

**Area Accessibility Category C** includes all other development areas within the settlement hierarchy ranging from the urban area and suburbs in metropolitan areas and those in regional towns and cities to villages and rural and remote rural areas.