



PARTIAL REVIEW OF REGIONAL
SPATIAL STRATEGY (RSS) –

Consultation on Interim Draft Policies: Car Parking
January – 27 March 2009

(Responses by Question)

North West Regional Assembly

PARTIAL REVIEW OF REGIONAL SPATIAL STRATEGY (RSS) –

Consultation on Interim Draft Policies: Car Parking

A consultation report from

CAG Consultants

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

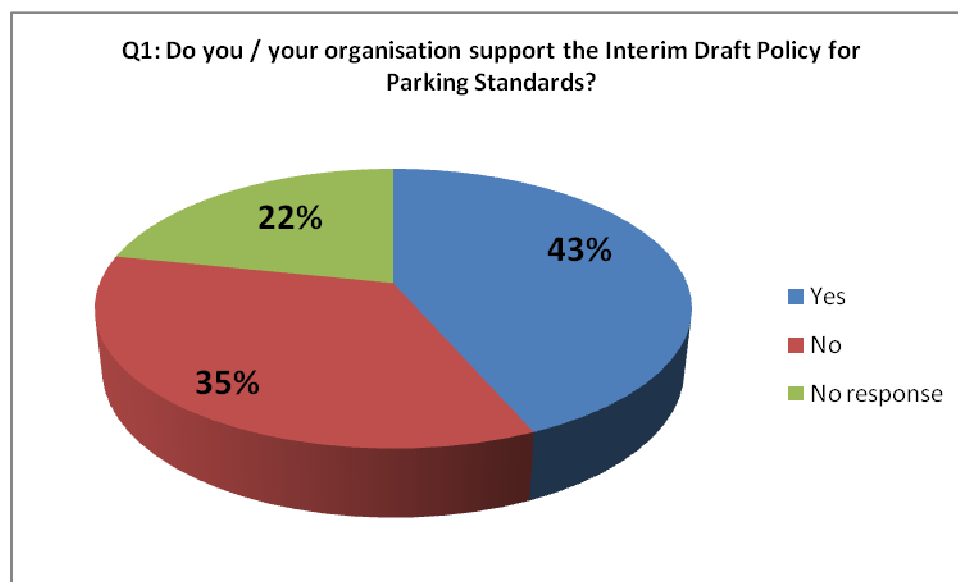
March 2009

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

1. Do you / your organisation support the Interim Draft Policy for Parking Standards?



2. Please tell us why you have given this response. (If your comment relates to table 8.1 please go to question 5.)

The table below shows the verbatim comments received.

Name:	Organisation:	1. Do you / your organisation support the Interim Draft Policy for Parking Standards?	2. Please tell us why you have given this response. (If your comment relates to table 8.1 please go to question 5.)
Chris Findley	AGMA	-	This note sets out AGMA's response in relation to the current consultations taking place on the RSS Partial Review for the proposed revision of RSS Policy RT2 - Managing Travel Demand, together with its associated proposed parking standards (Table 8.1) and accessibility assessment provisions (Appendix1). In relation to the proposed revisions, AGMA's concerns and comments fall into three broad categories:

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			<ul style="list-style-type: none"> • Firstly, AGMA has some concerns with the proposed revisions to Policy RT2 and its Supportive Text; • Secondly, AGMA has a number of concerns with the proposed Parking Standards as set out in Table 8.1; and • Thirdly, AGMA has reservations about the proposed approach to Area Accessibility Categories as set out in Appendix 1. <p>1. Policy RT2 and Supportive Text In relation to the suggested changes to the final bullet point of RT2, AGMA considers that it is important to retain the concept of parking standards having the possibility to be anymore restrictive than Table 8.1.</p> <p>It is suggested, therefore, that consideration be given to retaining the original wording of the first sentence of the final bullet point of adopted RT2. Furthermore, as it is not clear that the use of the questionnaire is mandatory, reliance should be placed on the supportive text in paragraph 2 (subject to the comments below) rather than making reference to the approach being outlined in Appendix 1.</p> <p>In paragraph 1 AGMA suggests that the text could be made more concise by amending the 3rd sentence to read: However, it must be noted that parking standards are only a single tool in the implementation of demand management by local planning, highway and integrated transport authorities.</p> <p>The final sentence could then be deleted as it would appear to add little to the revised 3rd sentence set out above. However, it should be made quite clear that parking standards are strongly dependent on travel plans, accessibility improvements and demand management. It would be useful to have more guidance on integrating these tools fully. In paragraph 2 and RT2 it is not clear whether the use of the questionnaire is a requirement. If this is the case then this text should be less specific. A slightly amended version of Paragraph 8.8 in the adopted RSS might be more appropriate.</p>
Richard Evans	Allerdale Borough Council	Yes	We endorse the comments of Cumbria County Council, and in particular those concerning towns like Maryport, Cockermouth and Wigton which are surrounded by large rural areas heavily dependent upon the car for accessibility to local services.
Stuart Penny	Cheshire East Council	Yes	Broadly welcome introduction of new standards subject to the comments below. Applying restrictive maximum parking standards will also need an integrated on-street

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			parking regime surrounding development sites and robust travel plan measures to ensure that any displaced motorists do not park on the neighbouring highway network.
Gill Smith	Cheshire West and Chester Council	Yes	Broadly welcome introduction of new standards subject to the comments below. Applying restrictive maximum parking standards will also need an integrated on-street parking regime surrounding development sites and robust travel plan measures to ensure that any displaced motorists do not park on the neighbouring highway network.
Alison Marland	Chorley Borough Council	Yes	<p>Chorley Council support the draft regional parking standards overall. Table 8.1 is a very useful tool and is easy to apply. The area accessibility categories are a useful part of the standards as it is important to establish the differences in the size of authorities to enable the standards to be relevant to each individual area.</p> <p>Figure 7-1 of the standards relating to residential parking standards is also a very quick and useful tool to use. This enables authorities to calculate the standards for individual and large-scale residential developments in a simplistic but effective way.</p> <p>We have some concerns however with the accessibility questionnaire. The theory of the questionnaire is good and the indication in table 8.1 of when the questionnaire is needed is easy to understand. However, the questionnaire in each part shows the possible maximum scores but there isn't any guidance or notes to indicate what constitutes each score. This may lead to discrepancies in the scoring of the questionnaire. If there were some guidance notes regarding the scoring of the questionnaire it could be a useful tool to run alongside table 8.1 and each site would be scored consistently with the next.</p>
Caron Taylor	Chorley Borough Council	Yes	They seem clear (but see later comments)
Charles Sargeant	Coniston Parish Council, Cumbria LA21 8AP	No	In general, there needs to be an organised approach to parking. Specifically, that approach will fail some areas, like our own, which doesn't suffer from cars but from buses and large lorries that are too big for our rural roads (A593, B5285).
Andy Yuille	CPRE North West	No	<p>Overall we support the policy, subject to the following comments:-</p> <p>1. Secure cycle parking provision is absolutely essential to enable this sustainable, non-polluting, healthy form of transport to increase. While appreciating that the standards set are minimums, and welcoming the introduction of minimum standards, the</p>

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			<p>comments & considerations should emphasise this point further. Eg. Even small office developments SHOULD provide facilities for cyclists instead of Even small office developments MAY BE ABLE TO provide facilities for cyclists.</p> <p>While the best parking facilities (eg shelters with lockable doors) may have significant cost implications, simple means of securing bikes – metal loops in walls or floors - are not expensive and are an absolute minimum requirement. No-one will cycle to a destination where they cannot secure a bike. This must be brought out more strongly, or the rest of the fine words and good intentions about encouraging cycling will have no impact. There must be encouragement to deliver far more than the minimum requirements as these are generally very low. Preferably, these minimums should be significantly increased. This need should also be reflected more strongly in the questionnaire.</p> <p>2. It is also important to note that where car parking provision may be shared (eg as identified on business parks), this must explicitly NOT apply to disabled parking spaces anomalies could otherwise arise where disabled spaces are provided at an inappropriate distance from the destination.</p> <p>3. There should be reference to including another relevant stakeholders in discussions, consultation and negotiations about parking for ports, airports, hospitals, 'events', arenas, outdoor leisure, and boarding schools, residential colleges & training centres.</p>
David Butler	CTC (Cyclists' Touring Club)	Yes	-
Graham Hale	Cumbria County Council	Yes	<p>1.1 The proposed new car parking standards as contained in draft Policy RT2: 'Managing Travel Demand' and Proposed Revised Table 8.1 are broadly supported.</p> <p>1.2 The use of the proposed Accessibility Questionnaire is also considered helpful in giving Highways Authorities, such as Cumbria County Council the discretion to determine the most appropriate standard that should be applied to any specific area. The premise of linking accessibility and maximum parking standards is considered to be appropriate, and will aid in encouraging the use of sustainable transport.</p> <p>1.3 It is noted that the bulk of the car parking standards proposed in Table 8.1 for Area Type C are broadly the same as that contained in the adopted Cumbria and Lake District Joint Structure Plan 2001 - 2016 Policy T32: 'Car Parking Standards'. This is</p>

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			<p>considered helpful as county council had argued in previous consultations for flexible car parking standards that better reflected the rural, sparse nature of this county.</p> <p>1.4 According to Table 8.1, it is likely that some but not all areas within Cumbria would fall within Area Type C, rather than Area Types A and B. It is also likely that the urban parts of Carlisle City centre, which is considered a regional town or regional city in the saved and extended Cumbria and Lake District Joint Structure Plan Policy ST5, may fall within Area Type A, but that less urban parts could fall within Area Type B. This flexibility in the implementation of the car parking standards is considered helpful, given that the urban parts of Carlisle are relatively accessible to a range of different transport modes, other than the use of the car, compared to the less central urban fringe of the city. The same may be said of Barrow, which, like Carlisle, benefits from a range of alternative transport modes in the urban centre.</p> <p>1.5 However, for other large key service centre towns in Cumbria, such as Maryport, Ulverston, Whitehaven, Workington, Kendal and Penrith (as defined by saved and extended JSP Policy ST5), which are surrounded by significant rural hinterlands, there is far greater reliance on the use of the car. The reason being that people have no choice other than to use their cars to gain access to employment, shopping, and leisure activities. In terms of the definitions of Area Type B, it unfortunately lumps non-metropolitan key service centre town centres with District or local centres in metropolitan areas and District or local centres in regional towns and cities. A number of Cumbrian Key Service Centres would be considered equivalent to Wilmslow and Ormskirk. There is some concern that the larger Key Service Centre towns in Cumbria would be subject to relatively higher car parking standards than that allowed for in the adopted Cumbria and Lake District Joint Structure Plan, and this may have an adverse impact upon their future accessibility.</p> <p>1.6 For other smaller key service centre towns in Cumbria, such as: Brampton, Longtown, Wigton, Aspatria, Cleaton Moor, Cockermouth, Dalton - in-Furness, Egremont, Silloth, Millom, Alston, Appleby, Milnthorpe, Kirkby Stephen, Kirkby Lonsdale, and Grange-over-Sands, (as defined in saved and extended JSP Policy ST5), it is equally unclear as to whether they would fall within Area Type B or C. If they are classified into Area Type B, then they would also be considered equivalent to non-metropolitan key service centre town centres with District or local centres in metropolitan areas, and</p>

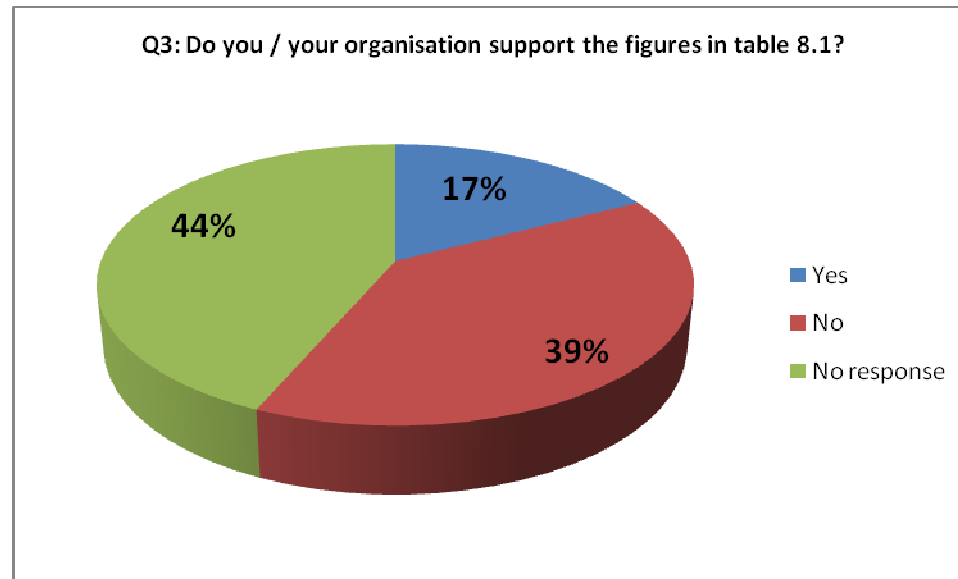
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			<p>District or local centres in regional towns and cities. This is also not considered acceptable, as this may have a significant adverse impact upon their future accessibility. It is recommended that examples of comparable towns should therefore be defined in the Area Accessibility Categories on page 7 to help aid implementation . Alternatively, the standards could be amended in order for the Local Authority to determine the appropriate standard to be applied to a defined area.</p> <p>1.7 The Accessibility Questionnaire itself and the criteria definitions are considered very urban orientated, and do not fully reflect the differing opportunities to access alternative means of transport in sparse rural areas found in Cumbria. The Local Highway Authority should be allowed to adapt the Accessibility Questionnaire, while still retaining the section headings (with the exception of Tram as none operate in Cumbria), in order to reflect appropriate local standards which reflect the contrasting nature of Cumbria.</p> <p>1.8 It is noted that for residential developments the parking standard is advisory. This is welcomed as given the sparse rural areas in Cumbria and the associated lack of alternative modes of transport, the standards should be sufficiently flexible in order to enable Local Authorities to set minimum parking standards for residential developments, particularly in 'C' class area accessibility categories. This approach allows for developments to be designed to take into account the likely parking associated with such developments. Requiring developments to accommodate a minimum parking requirement should reduce the likelihood of indiscriminate parking taking place which prejudices road safety and has a detrimental impact on the streetscape</p>
Sara Lewis	GONW	Yes	-
Arthur Duffy	Knowsley MBC	No	The approach and parking standards recognise the need to reduce travel by car but that travel by car is necessary in less accessible areas.
Helen Houghton	Lake District National Park Authority	No	We object to the revised policy and supporting text because it is too prescriptive and not necessarily appropriate to National Parks which are predominantly rural and experience high numbers of visitors on a regular basis (paragraph 2 of the revised text rightly identifies different circumstances in environmentally sensitive areas). We would like the reference to Appendix 1 to be removed from the policy and the methodological detail to be removed from paragraph 2. The sentence on Line 13 of paragraph 2 which

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			begins 'It will be the responsibility...' will not be possible in all areas.
Mike Kirby	Lancashire County Council	Yes	Provision of a full set of regional parking standards is supported in principle. They are an effective tool in managing travel demand. Their application across the region would ensure a consistent basis for the assessment of parking requirements whilst including flexibility to allow for location and accessibility factors. The new standards represent good practice taking account of location and accessibility of the site rather than the application of blanket standards. They are also expressed as maximum standards rather than minimum. In these respects they are similar to the former Lancashire Car Parking Standards which supplemented the Joint Lancashire Structure Plan until September 2008, when the RSS was approved. The approach is understood in Lancashire and would provide a return to a former approach. Some of the actual baseline standards are the same or similar to those in the former Lancashire standards.
Stewart House	Macclesfield Borough Council	No	The production of revised guidance is broadly welcomed but certain issues need to be addressed: 1) The need for an integrated on-street parking regime surrounding development sites and robust travel plan measures to ensure that any displaced motorists do not park on the neighbouring highway network. 2) To look again at rural areas as the suggested maximum parking standards may be over restrictive. Problems have been experienced with the development of educational and medical facilities in rural areas where accessibility / public transport provision is poor and little impact can be made through the travel plan process apart from car sharing.
Daniel Barrett	Merseyside LTP Support Unit on behalf of the Merseyside Transport Partnership	No	The draft policy parking standards support the Merseyside approach to determining parking and accessibility standards across the sub-region. We support the policy, but only if there is flexibility for Local Authorities in applying the policy
Lillian Burns	North West Transport Activists Roundtable	No	Cycle parking standards need to be better than proposed if sufficient modal shift is to be achieved. People will not be encouraged to cycle more to more places unless they feel confident there is secure and adequate cycle parking.
Steven Broomhead	Northwest Regional Development Agency	-	The Agency has no specific comments on the proposed revisions to the regional parking standards.

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Warren Marshall	Peel Ports Group	-	-
John Halton	Pendle Borough Council	Yes	Pendle Council supports the proposed Regional Car Parking Standards, but would like to see them include a specific car parking standard for Use Class A Hot Food Take-aways.
Stephen Ottewell	South Lakeland District Council	-	<p>We feel strongly that the application of the draft parking standards is likely to be academic in our area where accessibility and poor public transport provision requires a more pragmatic approach. Such an approach will make little difference to the provision on the ground other than to unnecessarily restrict sensible provision of parking facilities for schemes that needed them, often by relatively small amounts. By way of example - category B places non-metropolitan key service centre town centres in the same group as district centres in metropolitan areas. In the South Lakeland context, small settlements such as Milnthorpe, Kirkby Lonsdale and Grange-over-Sands are likely to be classified as Key Service Centres in the Core Strategy (and have historically been classified as Key Service Centres in the Structure Plan). However, this does not mean that they are in any way similar to district centres in metropolitan areas or that similar parking standards would be appropriate. We are uncomfortable with the introduction of such a complex approach to parking standards, including the application of a car parking standard questionnaire on a site-by-site basis. This will inevitably lead to delays with application processing and validation, and appears to be adding another layer of un-necessary complexity to the application process that is contrary to the Killian Pretty report. We would prefer simpler county wide standards as at present that we can apply with some degree of understanding of the local circumstances.</p>
R Donohoe	South Ribble	-	-
Mike Taylor	St Helens Metropolitan Borough Council	No	<p>No particular issues with the car parking standards (apart from a few minor suggestions referred to later) but some concern over the proposed level of cycle parking and grave concerns over the accessibility questionnaire. The concerns relate to the use of a scoring system. It is not understood how individual sites, notwithstanding their location within an accessible (or not) location, can be broken down into a numerical value. Every site, even ones along the same length of road, can have different characteristics and it is the job of the Development Control Officer to assess each site and then either involve the developer to discuss how concerns can be addressed or recommend refusal.</p>

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			<p>The whole system is based on meeting a points value but I've never seen an explanation as to how the target scores were derived. What is the rationale behind scoring walking/cycling/bus good, moderate and poor criteria as 3,2 & 0? Why not 2,1 & 0? (Which is the score for quality of a bus stop).Similarly, why do the bus frequency (scores - 4,2,1,0), distance (5,3,2,0) and number of services (4,3,2,0) have differing scores for each element? Why not 4,3,2 & 1? (Which is the score for tram distance).Why is the number of railway stations 3,2 & 0? Why not 2,1 & 0?Why is the walking distance for stations 4,3,2 & 0? Why not 3,2,1 & 0?Why is the quality of rail stations 3,2 & 0 when the quality of bus stops is 2,1 & 0?What does the score of these elements relate to? Is there a definition of the target scores for sites contained within the RSS?</p>
Andrew Fraser	Wirral MBC	Yes	<p>The approach proposed is likely to be more locally sensitive and would lend further support to initiatives already in place to support the implementation of the Merseyside Local Transport Plan.</p>

3. Do you / your organisation support the figures in table 8.1?



4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

Name:	Organisation:	3. Do you / your organisation support the figures in table 8.1?	4. Please tell us why you have given this response.
Chris Findley	AGMA	-	<p>2. Proposed Parking Standards (Table 8.1)</p> <p>On a general point it is accepted that the standards are aimed at reducing car dependency, however, as the North West has not seen a reduction in the percentage of people using a car as the usual method of travel to work, or for travel in general, AGMA needs to be confident that the proposals will not create additional on-street parking, as through LTP2 there is inadequate funding to address parking issues. In relation to more detailed matters, there are some concerns about the areas where no maximum</p>

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			<p>standards have been identified, namely: Hot food takeaways: Anyone who has observed the effect on traffic flow when these establishments have no off-street parking or lay-bys will know the disruption caused. It is therefore disappointing that no standard is quoted, which will surely weaken the hand of Development Control staff when assessing the many proposals for this type of use.</p> <p>Hospitals: To suggest that parking provision be established by negotiation in individual cases fails to recognise the usual LA policy background which seeks to minimise staff/ visitor parking, maximise building utilisation of the hospital site and promote innovative travel planning. Again the hand of Development Control will be weakened if there are no guidelines, since despite the assurance that health professionals are now more aware of the need for sustainable transport, practice has yet to demonstrate it. Perhaps consideration needs to be given to prescribing a standard for staff (similar to offices but adjusted to account for shifts) and possibly there should be reference to the need for a holistic approach with consideration of a local CPZ to accommodate residents.</p> <p>Outdoor leisure: Again a likely form of new development, especially in Green Belt, and one where you would expect substantial traffic generation issues which should be guided by specific advice for the various types of leisure involved. However, it is recognised that developing a satisfactory standard or range of standards for outdoor leisure, which may cover a multitude of uses, could be difficult. Vehicle service/repair workshops Adult day centre/training centre/disabled day care Garden Centres In terms of specific issues with the proposed standards where figures are given, AGMA has the following concerns:</p> <p>Storage and distribution: The proposed standard of 1 space per 45 sq m is a significant departure from the current AGMA standard of 1 space per 100 sq m, what is the justification for this?</p> <p>Care homes: There seems to be an error in the standards as in Areas B and C it is proposed to provide less parking as a maximum than in Area A.</p> <p>Sheltered accommodation: There seems to be an error in the standards as in Areas B and C it is proposed to provide less parking as a maximum than in Area A.</p> <p>Creche: There is a concern that at the planning stage there can be uncertainty about staff numbers in order to make an assessment of the acceptability of the car parking provision. In addition, it needs to be made clear that adequate visitor/drop off</p>

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			<p>provision will be required which is satisfactory and not likely to cause a road safety issue when parents pick up and drop off on roads where we would wish to discourage such actions.</p> <p>Schools: There is a concern that the proposed Category A standard of 1 space per classroom is below the AGMA standard of 1.5 spaces per classroom and, therefore, does not take account of parking for any of the non-teaching staff in the school or visitor parking unlike in our current standards. AGMA's concerns are that many schools are located in non-sustainable locations and teachers although receptive to travel by sustainable modes of transport do not see it as practical due to the amount of correspondence that they carry on a daily basis.</p> <p>Higher and Further Education: Reference should be made to the need for travel plans for this use in particular because of the issue of no/limited provision for non-teaching staff parking and student parking which can impact significantly on on-street parking. Also, there seems to be an error in the standards as in Area B it is proposed to allow more parking than in Area C.</p> <p>Assembly and Leisure: The Category A standard for cinema, bingo, etc (1 per 10 seats) differs from the current AGMA standard (1 per 8 seats) - what is the justification for this?</p> <p>Dwelling houses: The proposed standards are more restrictive in some cases than current AGMA standards and there is a concern that overly restrictive standards in residential areas can lead to negative impacts on design and layouts e.g. parking on footways, loss of garden areas, etc. Also, why does the Category A 1 bedroom standard say 0.5 to 1, surely it could be a maximum of 1 which would allow car-free housing to be delivered in town centre locations.</p>
Richard Evans	Allerdale Borough Council	Yes	We again endorse the comments of Cumbria County Council.
Stuart Penny	Cheshire East Council	No	<p>In rural areas the suggested maximum parking standards may be over restrictive. There have been problems with the development of educational and medical facilities in rural areas where accessibility/public transport provision is poor and little impact can be made through the travel plan process apart from car sharing. Column N, Food Retail Small food and non-food facilities- there have been problems with small food stores having inadequate car parking provision creating problems on the highway network. Suggest looking again at this comment. The figures and comments in Table 8.1 for B8</p>

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			<p>Storage & Distribution are an over simplification of the relationship between floor area and staff numbers. As floor area increases this does not necessarily result in a proportional increase in staff numbers. Some of the very large warehouses are highly automated and employ relatively small numbers of staff for the size of the building. The proposed parking standard is too simplistic. Long term storage is different to an intensive distribution development as far as staff numbers and traffic generation are concerned. Given the current land use planning system there may be little that can be done to resolve this and it will be up to the developer to identify the level of parking necessary within the maximum parking standards. Table 8.1 should comment that clinics and health centres should be resisted if proposed in unsustainable locations. Guidance on parking standards for dwelling houses is welcome as PPS 3 makes only passing reference to the need for residential parking standards. The advice regarding the treatment of garage spaces is also welcome.</p>
Gill Smith	Cheshire West and Chester Council	No	<p>In rural areas the suggested maximum parking standards may be over restrictive. There have been problems with the development of educational and medical facilities in rural areas where accessibility/public transport provision is poor and little impact can be made through the travel plan process apart from car sharing. Column N, Food Retail Small food and non-food facilities- there have been problems with small food stores having inadequate car parking provision creating problems on the highway network. Suggest looking again at this comment. The figures and comments in Table 8.1 for B8 Storage & Distribution are an over simplification of the relationship between floor area and staff numbers. As floor area increases this does not necessarily result in a proportional increase in staff numbers. Some of the very large warehouses are highly automated and employ relatively small numbers of staff for the size of the building. The proposed parking standard is too simplistic. Long term storage is different to an intensive distribution development as far as staff numbers and traffic generation are concerned. Given the current land use planning system there may be little that can be done to resolve this and it will be up to the developer to identify the level of parking necessary within the maximum parking standards. Table 8.1 should comment that clinics and health centres should be resisted if proposed in unsustainable locations. Guidance on parking standards for dwelling houses is welcome as PPS 3 makes only passing reference to the need for residential parking standards. The advice regarding the treatment of garage spaces is also welcome.</p>
Alison Marland	Chorley Borough Council	-	-

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Caron Taylor	Chorley Borough Council	-	-
Charles Sargeant	Coniston Parish Council, Cumbria LA21 8AP	No	-
Andy Yuille	CPRE North West	-	-
David Butler	CTC (Cyclists' Touring Club)	Yes	But we feel some of the standards need to be more ambitious (see number 8)
Graham Hale	Cumbria County Council	Yes	None other than as already stated in question 4.
Sara Lewis	GONW	No	The approach used is very detailed and includes a very large number of divisions within each use class, this seems an overly specific policy for a strategic level plan. In relation to residential parking standards PPS3 states that a Local Planning Authorities should, with stakeholders and communities, develop residential parking policies for their areas, taking account of expected levels of car ownership, the importance of promoting good design and the need to use land efficiently. It is not clear how the policy at regional level will fit with the approach set out in PPS3 and therefore whether standards should be included for residential development at a regional level. Is it necessary to then have a further appendix which covers exclusions from the table would not issues of substance be covered in the table as footnotes or as part of more detailed implementation notes.
Arthur Duffy	Knowsley MBC	Yes	The parking standards recognise the need to reduce travel by car but that travel by car is necessary in less accessible areas.
Helen Houghton	Lake District National Park Authority	No	The standards for Business parks (B1) now provide for greater levels of parking. Standards for dwelling houses do not encourage sustainable living. We do not understand the notes for D2 and general category below (starting 'these facilities should only be provided...')
Mike Kirby	Lancashire County Council	-	-
Stewart House	Macclesfield Borough Council	-	-
Daniel Barrett	Merseyside LTP Support Unit on behalf of the	No	Support all figures except D1 Higher and Further Education, proposed amendment: Area Type B 1 Space per 15 Students Area Type C 1 Space per 10 Students

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	Merseyside Transport Partnership		
Lillian Burns	North West Transport Activists Roundtable	No	The figures for cycle parking are not sufficiently ambitious and no serious attempt has been made to tackle the matter of car parking at railway stations
Steven Broomhead	Northwest Regional Development Agency	-	
Warren Marshall	Peel Ports Group	-	
John Halton	Pendle Borough Council	-	
Stephen Ottewell	South Lakeland District Council	-	
R Donohoe	South Ribble	-	
Mike Taylor	St Helens Metropolitan Borough Council	No	<p>Car Parking - No particular issues with the car parking standards apart from the following:</p> <p>C2 It would appear that the standard for area types A & C should be the other way round. As it stands a 20 bed care home would need 5 spaces in an urban area (A) but only 4 spaces in a rural area (C).</p> <p>C3 There are concerns over the required provision for 2/3 bed dwellings of 1.5. Because of the problems with on-street parking that are experienced throughout residential areas, it is felt that this should be a maximum of 2; restricting car space at home is not likely to influence car ownership. The standards for motor showrooms will need to be expanded for external floor area sales and other uses e.g. MOT bays etc. We've had particular problems with a number of applications for motor showrooms where adequate space for staff, customers and vehicles undergoing repairs/services has been an issue.</p> <p>Cycle Parking: There are concerns over the cycle parking requirements, particularly given that the cycle parking standards are minimum standards and there is no distinction between long stay facilities and short stay facilities. One means of addressing the following concerns is for the standards to be maximum standards.</p> <p>A1 This seem high, particularly for food retail.</p> <p>C3 This is extremely high particularly as it states allocated and communal spaces; a</p>

Name:	Organisation:	3. Do you / your organisation support the figures in table 8.1?	4. Please tell us why you have given this response.
			<p>development of 2 bed flats will require a massive area of cycle parking that will rarely be used. Is there a need to specify spaces for a house? Surely this would be personal choice. The standard for schools is extremely high. At 1 per 5 staff plus 1 per 3 students it is the same standard as Further Education; yet how many primary children are likely to travel to school? Some distinction needs to be made between primary, secondary and further education. Even so the standards still seem high. The standard for halls and places of worship seems high, particularly given the demographic attendance. As mentioned above, the standard for Higher Education is extremely high. The standard for D2 assembly and leisure seems high. The standard for theatres seems high. Whilst the need to improve cycle facilities overall and encourage more cycling is accepted it does seem that these standards are particularly onerous and will result in unused areas that may lead to anti-social behavioural issues. It would seem more appropriate to use them as maximum requirements rather than minimum requirements.</p>
Andrew Fraser	Wirral MBC	No	<p>The standards as a whole appear to provide a comprehensive approach to the range and types of use most likely to require consideration. Wirral Council does not, however, fully agree with the approach to residential standards or hospitals. The proposed standards for residential parking for Area Accessibility Category B would allow a maximum of 2 parking spaces for 2 to 3 bedroom dwellings and 3 spaces for 4 plus bedroom dwellings. This seems high for 2 bedroom accommodation and could provide an excess of parking for developments containing 2 bedroom dwellings, especially for flat developments with a mix of 1 and 2 bedrooms flats. It may, therefore be more appropriate to have 1 to 2 bedroom dwellings grouped together to provide a maximum of 0.5 to 1 space in Area Accessibility Category A and 1 space in Area Accessibility Category B. Table 8.1 and Figure 7.1 should be amended accordingly.</p> <p>Wirral Councils current guideline is 1.5 spaces per dwelling. The proposed standards would double this for dwellings with 4 plus bedrooms and would go against the Councils commitment to encourage sustainable travel within the Borough. It may, therefore, also be more appropriate to have 3 and 4 plus bedroom dwellings grouped together to provide a maximum of 1.5 spaces in Area Accessibility Category A and 2 spaces in Area Accessibility Category B. Although still above the Councils current maximum of 1.5 spaces, this may be an acceptable compromise. T</p> <p>able 8.1 and Figure 7.1 should be amended accordingly. The proposed approach to garage space, combined with the high levels of parking proposed, could provide a loophole that could be exploited to provide excessive parking. For example, a 4 plus</p>

Name:	Organisation:	3. Do you / your organisation support the figures in table 8.1?	4. Please tell us why you have given this response.
			<p>bedroom dwelling in Area Accessibility Category B could potentially have 3 parking spaces plus garage spaces. The following amended wording is, therefore, suggested - Garage spaces are not included within the space provision. However, if a development provides garages then, where possible, protecting the long term use for the storage of a vehicle by appropriate planning conditions should be sought.</p> <p>The proposal to exclude hospitals from the parking standards could be seen as encouraging car travel and could undermine local attempts to encourage more sustainable travel to hospital sites. The following amended wording is, therefore, suggested - A local parking standard for hospitals has a level of 1 car parking space per 4 staff and 1 space per 3 day visitors. However, in today's society hospital sites are multi-occupancy developments, which cater for more than just the district general hospital. To provide a true reflection of the complex range of uses on such sites a more detailed analysis of the land use should be provided to calculate the parking standard on a case-by-case basis."</p>

5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

Name:	Organisation:	5. Do you have any comments to make about the supporting text?
Chris Findley	AGMA	-
Richard Evans	Allerdale Borough Council	No
Stuart Penny	Cheshire East Council	-
Gill Smith	Cheshire West and Chester Council	-
Alison Marland	Chorley Borough Council	Regarding the scoring of the questionnaire it could be a useful tool to run alongside table 8.1 and each site would be scored consistently with the next.
Caron Taylor	Chorley Borough Council	The document at the moment does not make sense. I have tried using them for a current planning application I am dealing with. I have established the it is in Area Type C and done the questionnaire and got a score, but no where does it tell me what to do with this score - how does it relate to the table? what does this score mean in reducing the parking requirement from the maximum?
Charles Sargeant	Coniston Parish Council, Cumbria LA21 8AP	-
Andy Yuille	CPRE North West	<p>As noted in response to q 3 above, greater emphasis needs to be placed on the provision of (at least) basic secure cycle parking facilities at all destinations, or there will be no increase in cycling and other related policies (RT2, DP5, RT9) will fail to have an impact. Cycle theft is common and even a committed cyclists first thought will always be 'can I leave my bike there safely?' If not, s/he will not cycle to that destination. For example, in para 3, replace:</p> <p>Along with motorcycles, cycling should be encouraged as an alternative to private car travel and parking should be provided at a level to assist in this with Along with motorcycles, cycling should be encouraged as an alternative to private car travel and parking should be provided at a level to assist in this. If cyclists cannot be sure that they will be able to secure their bike at a given destination, they will not choose to cycle there. It will certainly be impossible to attract new cyclists unless there is adequate secure, and preferably sheltered, parking.</p>
David Butler	CTC (Cyclists' Touring Club)	-
Graham Hale	Cumbria County Council	None other than as stated in Ques 4.

Name:	Organisation:	5. Do you have any comments to make about the supporting text?
Sara Lewis	GONW	<p>In relation to the supporting text it should be correctly called 'supporting' and not 'supportive' text</p> <p>It is not clear whether the text included in the consultation is in addition to that already appearing in RSS in support of RT2 and whether any of the existing RT2 text is to be deleted and if so which paragraphs will be deleted</p> <p>In relation to appendix 1 see comments above in 6</p> <p>Appendix 2. The distinction between the categories of locations set out in the appendix do not seem to relate clearly to terminology used in RSS. For example RSS does not include Regional towns and key service centres are not defined in RSS.</p>
Arthur Duffy	Knowsley MBC	Additional clarity is required as to whether disabled parking forms part of the maximum parking provision or is additional to it.
Helen Houghton	Lake District National Park Authority	We object to the supporting text. The previous text set the context for this policy i.e. climate change, managing travel demand, and examples of sustainable schemes. This has been lost in the revised text. We object to the level of prescriptive detail in paragraph 2 that relates to accessibility categories and accessibility assessment for the reasons given earlier. We object to the inclusion of motor cycles in paragraph 3 as this potentially conflicts with DP7 bullet 8 regarding the maintenance and enhancement of tranquillity. There is an issue in some National Parks with the adverse impacts of motor bikes (noise, more safety signs and so on).
Mike Kirby	Lancashire County Council	The supportive text to the policy could make reference to other tools, such as travel plans, which are part of a wider package of measures to reduce the need for parking and private car usage.
Stewart House	Macclesfield Borough Council	-
Daniel Barrett	Merseyside LTP Support Unit on behalf of the Merseyside Transport Partnership	No
Lillian Burns	North West Transport Activists Roundtable	The supporting text should commit to a review of railway station parking and park and ride sites with a view to developing guidance and best practice advice
Steven Broomhead	Northwest Regional Development Agency	-
Warren Marshall	Peel Ports Group	-
John Halton	Pendle Borough Council	-
Stephen Ottewell	South Lakeland District Council	-

Name:	Organisation:	5. Do you have any comments to make about the supporting text?
R Donohoe	South Ribble	-
Mike Taylor	St Helens Metropolitan Borough Council	-
Andrew Fraser	Wirral MBC	Clarification should be provided that the sections of the Accessibility Questionnaire related to public transport apply equally to other forms of public transport such as the Mersey Ferries. Further information should also be provided on how the results of the scoring associated with the Accessibility Questionnaire should be used and on the practical implications of various scores or bands of scores when calculating any reduction in the number of spaces that would normally be permitted in terms of the scales of reduction envisaged for any particular site or type of use.

6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Name:	Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
Chris Findley	AGMA	-
Richard Evans	Allerdale Borough Council	No
Stuart Penny	Cheshire East Council	-
Gill Smith	Cheshire West and Chester Council	-
Alison Marland	Chorley Borough Council	-
Caron Taylor	Chorley Borough Council	-
Charles Sargeant	Coniston Parish Council, Cumbria LA21 8AP	-
Andy Yuille	CPRE North West	-
David Butler	CTC (Cyclists' Touring Club)	(I will send these as a separate email as I suspect that the table is hard to read!) Inclusion of specific cycle parking standards in Policy RT2 marks a welcome step forward from the extant Regional Spatial Strategy. Most local authorities have policies which set out minimum standards of cycle parking provision, but these vary

Name:	Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?																												
		<p>considerably. Regional standards should help to improve the situation in areas where policies are absent or inadequate. Detailed comments on the actual standards are set out below. Quality & Security Whilst quantitative standards are helpful, the quality of provision is at least as important as the actual amount. There are many examples of parking provision which is of no practical value because of its design and location. Security, in particular, is of crucial importance for cyclists, and is often the major influence on decisions about whether to use a bike for a journey. It would be appropriate, therefore, for the review to include the following guidance:</p> <ul style="list-style-type: none"> • cycle parking, e.g. for visitors or shoppers, should be located as near as possible to the main entrance of buildings and covered by natural surveillance or CCTV. For large developments the cycle parking facility should be covered. • short stay cycle parking should be based on the Sheffield stand design. Cycle lockers and more complex systems should be available at destinations where long stay parking is required. • frequent small clusters of stands are preferable at places where they are used for short periods of time e.g. shops • all cycle parking facilities should have adequate lighting and if long-stay, protection from the weather. • in residential developments, cycle parking should be within a covered, lockable enclosure. For individual houses this could be in the form of a shed or garage. For flats or student accommodation either individual lockers or cycle stands within a lockable, covered enclosure are required, and these need to be adjacent to the properties they serve. • cycle parking for employees should be located within the curtilage of the development wherever practical, covered and in a convenient, secure location. • all cycle parking should minimise conflicts between cycles and motor vehicles. • there should be adequate space around cycle stands to manoeuvre bikes (there are some examples in the region where bike stands outside supermarkets have been located so close to boundary walls that it renders them useless) <p>Comments on standards included in table 8.1</p> <p>Where no comments are included, the standard is acceptable. Where the preferred standard is higher than the Partial Review proposed standard, this is because we feel that the RSS policy should be more ambitious. Cycle parking, of the right quality, has a significant impact on cycle use (and particularly on the decision about whether to use a cycle for a specific trip); it is therefore a key element in any strategy to promote cycle use.</p> <table border="0"> <tr> <td>Class</td> <td>Land use</td> <td>Partial Review proposed standard</td> <td>Preferred standard</td> </tr> <tr> <td>A1</td> <td>Food Shops</td> <td>1 space/140 sqm</td> <td>1 space/125 sqm should be minimum</td> </tr> <tr> <td>B1</td> <td>Business offices & light industry</td> <td>1/300 sqm</td> <td>1 space/250 sqm should be minimum</td> </tr> <tr> <td>B8</td> <td>Warehousing</td> <td>1/850 sqm</td> <td>1 space/500 sqm should be minimum</td> </tr> <tr> <td>C1</td> <td>Hotels & guest houses</td> <td>1/10 guest rooms</td> <td>+ 1 space for every 2 staff</td> </tr> <tr> <td>C2</td> <td>Residential institutions</td> <td>1/40 beds (care homes); 1/20 (sheltered)</td> <td>+ 1 space for every 2 staff</td> </tr> <tr> <td></td> <td>Student</td> <td></td> <td></td> </tr> </table>	Class	Land use	Partial Review proposed standard	Preferred standard	A1	Food Shops	1 space/140 sqm	1 space/125 sqm should be minimum	B1	Business offices & light industry	1/300 sqm	1 space/250 sqm should be minimum	B8	Warehousing	1/850 sqm	1 space/500 sqm should be minimum	C1	Hotels & guest houses	1/10 guest rooms	+ 1 space for every 2 staff	C2	Residential institutions	1/40 beds (care homes); 1/20 (sheltered)	+ 1 space for every 2 staff		Student		
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Name:	Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
		<p>accommodation No standard suggested 1 per bedspace D1 Schools 1/5 staff; 1/3 students 1 per 2 students should be minimum Art galleries, museums, libraries 1/200 sqm + 1 space for every 2 staff Higher education 1/5 staff; 1/3 students 1 per 2 students should be minimum D2 Cinemas, etc 1/20 seats + 1 space for every 2 staff Misc Theatres 1/20 seats + 1 space for every 2 staff Transport Termini No mention is made of cycle parking at transport termini. This is of considerable importance, and has a significant impact on cycle use, especially for journey to work trips. Unfortunately there are no generally agreed standards which could be applied throughout the region (though Transport for London, for example, has set standards of between 1/200 and 1/1000 entrants to train stations, depending on zone, and 1/50 for peak period passengers at bus stations). However, this is of such importance for the development of a sustainable transport system across the region that we believe that a set of standards should be developed, and that this should be the subject of further consultation.</p>
Graham Hale	Cumbria County Council	None other than as stated in Ques 4.
Sara Lewis	GONW	-
Arthur Duffy	Knowsley MBC	No
Helen Houghton	Lake District National Park Authority	-
Mike Kirby	Lancashire County Council	-
Stewart House	Macclesfield Borough Council	-
Daniel Barrett	Merseyside LTP Support Unit on behalf of the Merseyside Transport Partnership	No
Lillian Burns	North West Transport Activists Roundtable	-
Steven Broomhead	Northwest Regional Development Agency	-
Warren Marshall	Peel Ports Group	<p>Thank you for your email notification of 9th December in respect of the above and for the opportunity to comment on the draft. As a general point we support the exclusion of 'Ports' from the Standards Table not least given the complexity and diversity of activities and uses which take place within our operational port estates. It is acknowledged that our operations generate significant transport and traffic related issues and we would suggest a reference be included to the preparation of Port Master Plans (DfT Guidance 18th December 2008)</p>

Name:	Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
		<p>and which may include for example surface access strategies and green travel plans. In terms of port operations the commentary refers to ferry and freight uses. However, we would wish to refer you to the significant amount of complimentary port activity associated with warehousing and logistics and processing uses. The Port of Liverpool for example accommodates in excess of 150 tenants engaged in a range of port activities many of which will have differing levels of car parking demand. In terms of handling freight the increasing trend is towards unitised loads (lo-lo and ro-ro). In both cases the demands upon the port estate tend to be focused on extensive handling, storage areas, hardstanding etc. The parking demands are incidental to the movement of freight rather than a specific parking requirement (other than the staff who may be employed at the terminals.) Likewise, for passenger ferry services it is a holding area for cars which is required rather than any particular demand for long stay car parking. Some more traditional cargos, for example coal, will have little or no car parking or vehicular implications with coal being imported by ship for onward transportation to the power stations by rail. In determining staff parking levels we would not recommend the applicability of the generic standards for either B1 and/or B8 uses as in our experience such standards result in artificially high off-street provision which in terms of land utilisation can result in 'wasted' area which could better be occupied by business space. We would therefore suggest Local Planning Authorities in conjunction with port operators are best placed to judge off-street car parking requirements on the basis of the individual merits of the proposal. I trust these comments are of assistance to you although should you require any further information or clarification please let me know.</p>
John Halton	Pendle Borough Council	-
Stephen Ottewell	South Lakeland District Council	-
R Donohoe	South Ribble	-
Mike Taylor	St Helens Metropolitan Borough Council	<p>The Merseyside Authorities are in the process of drafting a supplementary planning document 'Ensuring Travel Choice' which includes an accessibility questionnaire with a scoring system. A number of the Authorities, including St Helens, have concerns over the benefit/accuracy/methodology of this method of assessing sites. An exercise was carried out using the scoring system on a number of sites within St Helens and the results highlighted our concerns over trying to put a numerical value on sites of differing circumstances and would provide a difficult obstacle if we were arguing for or against the particular developments. One of the sites didn't meet any of the accessibility targets except for by car but was accepted at a Planning Inquiry that the site was accessible for all modes. The use of the scoring system would have been a handicap in delivering a key housing site. Another site met targets for walking and cycling and yet is situated on a route that cannot be considered as suitable for use by either pedestrians or cyclists. The scoring system would have hampered any attempt to secure accessibility improvements. Other sites were assessed and each resulted in the scoring system affecting our arguments for or against the proposals.</p>
Andrew Fraser	Wirral MBC	-

7. Any other comments?

The table below shows the verbatim comments received.

Name:	Organisation:	7. Any other comments?
Chris Findley	AGMA	<p>3. Area Accessibility Categories (Appendix 1)</p> <p>AGMA is concerned that the proposed approach to defining accessibility areas appears confusing, especially within built-up metropolitan areas where different levels of centre are in close proximity. Similarly, it is not clear whether it is intended that the accessibility questionnaire is to be treated as good practice or, that by putting a reference to it in the policy, it should now be regarded as mandatory. Since the role of the RSS is to provide a framework for LDF's and local decisions, should not the refining of parking standards be best done at the local level? AGMA agrees that it might be helpful to have a better understanding of accessibility in relation to planning proposals, but AGMA is not convinced of the need for this particular approach. It is noted, for example, that there is a relatively small difference in parking spaces resulting from the application of the standards to specific floorspace in each of the 3 area types. It is queried, therefore, whether Categories B and C could be combined. AGMA also queries why this approach is considered necessary when Accession could be applied to specific proposals, and this would give a more quantified basis for actual accessibility, although it is recognised that requiring Accession runs can have its problems, such as questions over the database. AGMA also has major concerns with the task of classifying its settlements according to the accessibility factors, especially when this would not be done for any other purpose, and there is a continued dislike of a system which offers less flexibility than the current RSS/PPG13 maximum standards approach. Is the solution to drop the A/B/C area definitions altogether, and instead apply an accessibility modifier, once we can agree what the accessibility criteria might be. A simple questionnaire approach, if it can be agreed, might be easier to apply in such circumstances. AGMA would welcome the opportunity to discuss this matter further. In addition to the general comments above, AGMA also wishes to make the following specific comments on the Area Accessibility Categories and the Accessibility Questionnaire: Specific Comments on the Area Accessibility Categories: The highest accessibility Category A is the easiest to define as settlements are specifically mentioned in RDF1. However, if individual LDF's identify the lower accessibility areas, there may be inconsistencies between what might appear in Category B and Category C in different areas. The original Table 8.1 in the draft RSS assumed that the 'urban standard' would apply throughout the Metropolitan Areas.</p> <p>There is also the problem in these areas of Category A, B and C areas being in very close proximity. Category C areas are still described as 'settlements', but what about free standing developments outside them? We cannot assume that there will be no new traffic-generating development outside settlements. Specific Comments on the Accessibility Questionnaire: This only seems to be of some use when looking at specific points, not settlements as a whole - for example only part of a town centre will be within 1200m walking distance of a station, and the quality of bus stops may be good in one part of the centre but not in others - they are unlikely to be of uniform quality throughout the centre. In this sense a system that addresses specific points may</p>

Name:	Organisation:	7. Any other comments?
		<p>actually be more appropriate for individual applications as it would test the accessibility of the particular site, and avoid the possibility of assuming good accessibility just because of the classification of an area when in fact on the ground the area might actually have very poor accessibility. Simply stating service frequencies as a whole gives no idea of how effectively these link origins with a specific development. Frequencies will vary considerably according to route, and AGMA does not see how an overall value can be of real significance. The questionnaire seems heavily weighted towards the existence of rail or light rail links. Outside of the bigger settlements the presence of a rail station or to a more limited extent a tram station may be more to do with an accident of history and may not in practice enhance the accessibility of what are basically local centres. This can be illustrated by reference to five mythical developments in 5 Wigan centres that have been scored using the questionnaire:</p> <ul style="list-style-type: none"> • Wigan Town Centre - 37 • Leigh Town Centre 26 • Standish Town Centre 14 • Appley Bridge Local Centre 12 • Crankwood Village 7 <p>Although close together in scoring terms Standish and Appley Bridge are far apart in reality - Standish having about 25 shops whilst Appley Bridge has only five. The Appley Bridge score is buoyed up by the presence of a railway station. If a questionnaire is to be used then AGMA considers that it will need more work to improve its practical application.</p>
Richard Evans	Allerdale Borough Council	No
Stuart Penny	Cheshire East Council	-
Gill Smith	Cheshire West and Chester Council	-
Alison Marland	Chorley Borough Council	Overall the parking standards table 8.1 is a very useful tool and the residential parking standards are easy to use which will make assessing proposals a lot quicker.
Caron Taylor	Chorley Borough Council	-
Charles Sargeant	Coniston Parish Council, Cumbria LA21 8AP	-
Andy Yuille	CPRE North West	-
David Butler	CTC (Cyclists' Touring Club)	-

Name:	Organisation:	7. Any other comments?
Graham Hale	Cumbria County Council	None
Sara Lewis	GONW	
Arthur Duffy	Knowsley MBC	No
Helen Houghton	Lake District National Park Authority	We would like to thank 4NW for taking account of earlier representations and for re-instating the reference to the Lake District National Park in paragraph 2 of the supporting text.
Mike Kirby	Lancashire County Council	<p>In relation to specific points raised in the proposed standards: Please do not hesitate to contact me if you require any further clarification or if you would like to discuss any of the points raised in more detail.</p> <p>Further advice is needed on the interpretation and application for the policies to ensure consistency including: The definition of the three broad location categories. This will be undertaken by local authorities and may best be done through linking it to settlements identified in Local Development Frameworks (LDFs); however, LDFs are not yet fully in place across the North West; The specification of reductions that should be applied to the minimum standards based on the accessibility ratings. These were included in the recommendations arising from the review but are not included in the interim draft policy; Guidance needs to be given on undertaking the accessibility questionnaire.</p> <p>In relation to the three broad locations of development (A, B and C) the baseline standards in relation to B and C for many categories of development are similar (or sometimes the same) but may be considerably different from location A. The rationale for this is not clear.</p> <p>Standards should be kept up under regular review to ensure that they remain up to date. Walking distance to bus stops should be referred to consistently as 400m.</p>
Stewart House	Macclesfield Borough Council	-
Daniel Barrett	Merseyside LTP Support Unit on behalf of the Merseyside Transport Partnership	We believe that the Merseyside approach is in conformity with the regional standards, and we would welcome conformity to be confirmed in writing, following further discussion with 4NW.
Lillian Burns	North West Transport Activists Roundtable	-
Steven Broomhead	Northwest Regional Development Agency	-
Warren Marshall	Peel Ports Group	-

Name:	Organisation:	7. Any other comments?
John Halton	Pendle Borough Council	-
Stephen Ottewell	South Lakeland District Council	-
R Donohoe	South Ribble	-
Mike Taylor	St Helens Metropolitan Borough Council	-
Andrew Fraser	Wirral MBC	-