

## Consultation comments on policy T2 – Parking for new developments

- Support - 18
- Neither support of object - 16
- Object - 31

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

<b>Comments in support of policy T2 – parking for new developments</b>		
<b>Response ID</b>	<b>Respondent comment</b>	<b>Officer comment</b>
ANON-KSAR-NKFC-K	<p>Kennedy Wilson support Policy T2 in seeking to deliver appropriate levels of car parking for new development whilst also promoting all forms of sustainable transport. From the outset of the design stage, new development at Solent Business Park will incorporate the infrastructure and facilities needed to comply with policy and encourage the uptake of sustainable modes of transport. This aligns with paragraph 104 of the National Planning Policy Framework, which states that opportunities to promote walking, cycle and public transport use are identified and pursued from the earliest stages.</p> <p>In particular, Kennedy Wilson support criteria v. of Policy T2, which provides flexibility for parking provision for commercial uses, with it to be considered on a “case by case basis”. To provide further clarity, it would be helpful for criteria v. to set out how a case by case basis will be measured/assessed, for example against the findings of a Transport Assessment accompanying an application, the proposed measures within a Travel Plan and local and site circumstances, such as the character of the local area, proximity of</p>	<p><b>Comments noted and support welcomed</b></p> <p>All applications need to have a design and access statement so see no reason to amend this.</p> <p>What we are trying to achieve is that development is not bound by parking standards and so are able to justify their own approach through the high quality design process. This will be determined on a case by case basis through the planning application process and the submission of a transport assessment and a design and access statement.</p>

	<p>public transport and existing parking arrangements and issues in the surrounding area. This approach would be consistent with that applied to residential development as set out in criteria ii.</p> <p>Furthermore, this approach would ensure that parking provision is genuinely evidence led and considered on its own merits for each site in a measurable way. Parking should not arbitrarily be constrained where it can be shown through the Transport Assessment that proposals would not lead to severe residual cumulative impacts on the road network. Kennedy Wilson are fully committed to encouraging and facilitating the use of sustainable modes of travel, which aligns with their own ESG objectives, but this needs to be appropriately balanced and led by evidence to ensure that parking provision can still meet market requirements to support the growth of a vibrant local economy.</p>	<p><b>Recommended response: no change</b></p>
ANON-KSAR-NKZU-S	<p>The policy is supported in accordance with development proposals at SH26.</p>	<p><b>Comments noted and support welcomed</b></p> <p><b>Recommended response: no change</b></p>
ANON-KSAR-NKJ6-A	<p>See comment below in next section.</p> <p>What about parking for existing properties where a planning application is made? How are these to be assessed considering a) Design statements and the implementation of policies to prevent front gardens being hard surfaced to provide parking - a particular issue with terraced properties? These need to be both strengthened and enforced to prevent hard surfacing of front gardens. Keeping front gardens is important for biodiversity, encouraging people to walk (safety and attractiveness) flood mitigation and b) where there is space for on street parking this helps traffic calming/reducing speeds through road narrowing.</p>	<p><b>Comments noted</b></p> <p>However Guidance on the permeable surfacing of front gardens issued on 1<sup>st</sup> October 2008 states that permitted development rights allow householders to pave their front garden with hardstanding without planning permission have changed in order to reduce the impact of this type of development on flooding and on pollution of watercourses.</p>

		<p>You will not need planning permission if a new or replacement driveway of any size uses permeable (or porous) surfacing, such as gravel, permeable concrete block paving or porous asphalt, or if the rainwater is directed to a lawn or border to drain naturally.</p> <p>If the surface to be covered is more than 5 square metres planning permission will be needed for laying traditional, impermeable driveways that do not provide for the water to run to a permeable area.</p> <p><b>Recommended response: no change</b></p>
ANON-KSAR-N8YF-P	<p>Need to reinforce that in the absence of adequate parking there needs to be easy access to excellent public transport, including for weekends/evenings. Consideration of car pooling would be good in developments- this was the original plan for a relatively recent development in Kings Worthy, but this never happened</p>	<p><b>Comments noted</b></p> <p>Car sharing is already covered in policy T1</p> <p><b>Recommended response: no change</b></p>
BHLF-KSAR-N8T8-3 Olivers Battery	<p>Mitigating and adapting to climate change and designing for low carbon infrastructure are described as vitally important and defining issues for the Local Plan. It is also noted that the Local Plan has a key role in assisting WCC with meeting its net zero target by 2030.</p> <p>The Local Plan prioritises development towards sustainable transport modes of travel which includes ultra-low and zero carbon emission vehicles,</p>	<p><b>Comments noted</b></p> <p><b>Amended text in policy T2 criteria iii below:</b></p> <p>i. Residential development proposed with no <b>car</b></p>

<p>Parish Council</p>	<p>while recognising that it may not be possible to completely rule out the use of the private car (this is not just due to the rural nature of the district but also the availability of alternative means of transport as well as the needs and wants of people to continue to use cars).</p> <p>Policy T2 requires developers to, as part of the design process, to demonstrate why they are planning for the number of car parking spaces in their developments and to be able to demonstrate how their proposal is linked to bus stops, Public Rights of Way and cycle route not just within the site boundary.</p> <p>The level of provision for residential development will be informed by listed local circumstances.</p> <p>The criteria set out in Policy T2ii include factors which appear of little relevance to what informs the use of the car and the reasons for trips made by households. There are several others such as proximity of key destinations in terms of cycling and walking, the time it takes to get to them by non-car modes of transport, the quality of the route, topography, the potential for making multi-purpose trips by modes other than the car.</p> <p>Policy T2iii confirms no parking provision will be supported subject to a short list of circumstances. These factors are subjective, for example what constitutes “easy walking distance of a range of services and facilities”, “suitable access to non-car based modes of transport”, and what demonstration will be required “that the lack of provision will not be to the detriment of the surrounding area or the need of those with limited mobility”? Regarding this last circumstance, the following words, based on Policy H9iii, should be added “including avoiding unacceptable increases in on-street parking in the surrounding area”.</p> <p>Parking may be limited with the proposed policy and, if so, there is likely to be inadequate provision of safe EV charging points. This is entirely contrary to what is described as the vital importance and a defining issue of mitigating and adapting to climate change and designing for low carbon infrastructure for the draft Local Plan as well as being a key in assisting the</p>	<p>parking provision will be supported where it is located in <del>easy</del> walking distance of a range of services and facilities, or there is <del>suitable</del> <b>appropriate</b> access to non-car based modes of transport, and it is demonstrated that the lack of provision will not be to the detriment of the surrounding area or the need of those with limited mobility;</p> <p>All applications need to have a design and access statement so see no reason to amend this.</p> <p>What we are trying to achieve is that development is not bound by parking standards and so are able to justify their own approach through the high quality design process. This will be determined on a case by case basis through the planning application process and the submission of a transport assessment and a design and access statement.</p>
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	<p>WCC with meeting its net zero target by 2030. OBPC considers requiring justification for the number of car parking spaces for each new dwelling is entirely the wrong approach. Notwithstanding the importance of mitigating climate change, the current approach of a Supplementary Planning Document (SPD) on Residential Parking Standards, which identifies the standards expected with developers having to justify any discrepancies, rather than every application having to include justification for the number of car parking spaces proposed is infinitely preferable.</p> <p>The policy proposed in the draft Local Plan will have significant impact on WCC resources, requiring subjective decisions and lead to different and potentially inconsistent outcomes for similar scenarios.</p> <p>Policy T2 should include an SPD on Residential Parking Standards which ensure every home has a safe place to charge EV. This will help include more certainty for all parties and also help reduce the number of vehicles parked on residential roads and pavements to the detriment of surrounding areas and those with limited mobility. OBPC look forward to the consultation on the SPD.</p>	<p>Policy H9 (purpose built student accommodation) is completely separate to this policy T2 parking for new developments. As a result of this including the same criteria would not be appropriate.</p> <p><b>Recommended response: amendments to be made to policy text</b></p>
<p>BHLF-KSAR-N8ZJ-U</p>	<p>Sovereign also supports the Policy T2 (parking for new developments) specifically encouraging the use of sustainable transport modes and sustainable location of development but also parking of residential development including for visitors taking account of local circumstances including the layout of development, a mix of dwellings, character of the local area and proximity of public transport. Residential development with no parking provision would be supported in sustainable locations.</p> <p>Clarification is required, however, on how this policy will relate to adopted parking standards in the district and whether the emerging policy will supersede such standards as this could have significant implications on development.</p>	<p><b>Comment noted and support welcomed</b></p> <p>All applications need to have a design and access statement so see no reason to amend this.</p> <p>What we are trying to achieve is that development is not bound by parking standards and so are able to justify their own approach through the high quality design process. This will be determined on a case by case basis through the planning application.</p>

		<b>Recommended response: no change</b>
BHLF-KSAR-N8BQ-A	We support reference to the character of the local area in this policy	<b>Comment noted and support welcomed</b>  <b>Recommended response: no change</b>

<b>Comments which neither support or object to policy T2 – parking for new developments</b>		
<b>Respondent number</b>	<b>Comment</b>	<b>Officer comment</b>
ANON-KSAR-NKB7-3	This will be a step forward. However, little is said about walking, or ensuring that new developments provide attractive safe pedestrian routes, separated from both cyclists and motorised traffic. Winchester has a Walking Strategy Document which should be a standard reference doc. for all developers. This is not mentioned. Urban trees, as well as having the cooling and shading virtues listed in another section, make walking a much more attractive option.	<b>Comment noted</b>  A city and separate district wide Local Cycling and Walking Infrastructure Plan (LCWIP) are currently being prepared jointly with HCC which will produce technical guidance and tools to help local authorities plan cycling and walking infrastructure and therefore when these are in place this will be the guidance to be referred.  <b>Recommended response: no change</b>
ANON-KSAR-NKAK-P	Cala Homes supports the recognition within criteria (ii) of Policy T2 that parking provision on residential developments shall take account of local circumstances. It is important however for the policy to explain how this would work in practice especially against often quite rigid and dated car parking standards. A site / location specific approach is welcomed but	<b>Comment noted</b>  The point is that they are not bound by parking standards and so are able to justify their own approach.

	<p>more detail is required to give developers confidence when working-up a scheme of the level of car parking provision that is likely to be support by officers and Members and the evidence base that would be needed to demonstrate this.</p>	<p><b>Recommended response: no change</b></p>
<p>ANON-KSAR-NKUC-2</p>	<p>The supporting text for this policy (at paragraph in 6.24 of the Draft Local Plan) sets out that WCC’s parking standards will be updated to reflect the Climate Emergency. It is explained that the new standards will move away from an onus on private car ownership and added that developers will need to justify why they are planning for the number of parking bays proposed.</p> <p>9.5 Catesby understands the premise of this approach. However, it is important that new developments are still designed to accommodate satisfactory levels of parking to ensure safety and attractiveness within developments. This is noting that car ownership levels are not expected to reduce, but rather the fleet composition is likely to become comprised of electric vehicles.</p> <p>9.6 Overall, effective parking standards are still necessary, as a failure to properly plan for car parking can lead to on-street parking, to the detriment of the street scene, as well as the unimpeded movement of emergency vehicles, cyclists, and pedestrians.</p>	<p><b>Comments noted</b></p> <p>All applications need to have a design and access statement so see no reason to amend this.</p> <p>What we are trying to achieve is that development is not bound by parking standards and so are able to justify their own approach through the high quality design process. This will be determined on a case by case basis through the planning application.</p> <p><b>Recommended response: no change</b></p>
<p>ANON-KSAR-NKXV-R</p>	<p>We note that for large parking provision, it would be sensible to adopt the new french mandated approach putting solar panels on top of the car parks to generate power for EV charging and the local area.</p> <p><a href="https://www.theguardian.com/world/2022/nov/09/france-to-require-all-large-car-parks-to-be-covered-by-solar-panels">https://www.theguardian.com/world/2022/nov/09/france-to-require-all-large-car-parks-to-be-covered-by-solar-panels</a></p> <p>This approach, however, could be taken for smaller bike stores so that power is supplied exactly where it is needed. We note that there have been a number of lithium ion battery fires caused by the charging of batteries for e-bikes and e-scooters so secure parking for these types of transport should have a fire risk assessment with easy access for fire services and</p>	<p><b>Comments noted</b></p> <p>However for this type of development in policy T2 it would not be appropriate to include this as a requirement, and any requirements such as this would have to go through the Local Plan viability assessment.</p>

	<p>ideally situated a (short) distance away from residential dwellings to minimise the risk of loss of homes. Li-ion fires cannot be put out as conventional fires.</p> <p>We note that unless the provision of public transport for rural areas is <b>DRAMATICALLY</b> improved, market towns and rural areas of the District will still be heavily reliant on car transportation. 2 buses a day is just not enough.</p>	<p>Unfortunately, public transport provision is outside of the remit of the Local Plan.</p> <p><b>Recommended response: no change</b></p>
ANON-KSAR-N8XU-4	<p>Comment:</p> <p>Grainger Plc supports the principle of promoting sustainable travel with a defined travel hierarchy that seeks to move away from the dependence on private car travel. The practicality of being able to successfully implement this approach without a clear programme for the delivery of supporting infrastructure is questioned. Grainger Plc look forward to understanding more about how the delivery of wider infrastructure across the District will be implemented in order to support the Council's ambitions for sustainable travel.</p> <p>It will be necessary for the Council to update the parking standards SPD in tandem with the Local Plan review in order to ensure that forthcoming development proposals can appropriately assess parking requirements during the initial site appraisal and viability stages of the development process. For the avoidance of doubt, clear guidance on the level of information required within the travel plan/supporting documents as part of the planning submissions to justify the proposed parking provision should be set out within the supporting text of the policy.</p>	<p><b>Comments noted</b></p> <p>All applications need to have a design and access statement so see no reason to amend this. What we are trying to achieve is that development is not bound by parking standards and so are able to justify their own approach through the high quality design process. This will be determined on a case by case basis through the planning application.</p> <p><b>Recommended response: no change</b></p>
ANON-KSAR-N81Y-1	<p>In general, any major planning submission would be supported by a comprehensive Transport Assessment, and it is expected that this will form the technical basis underpinning the Design and Access Statement. We therefore propose the following addition to draft Policy T2 point i):</p> <p>"i. The applicant can demonstrate in the Design and Access Statement,</p>	<p><b>Comments noted and support welcomed</b></p> <p>Agreed this is an omission and should be included.</p>



	<p>Transport Assessment and the Travel Plan, how the needs[...]"</p> <p>In terms of draft Policy point v) we welcome the proposed approach to the parking provisions for commercial uses.</p>	<p><b>Recommended response:</b> policy wording changed and now makes reference to Transport Assessment is included in policy T2i.</p> <p><u>Amendments to policy T2 (show in track changes).</u></p> <p>New development will only be permitted where;</p> <ul style="list-style-type: none"> <li>i. The applicant can demonstrate in the Design and Access Statement, <b><u>Travel Assessment</u></b> and the Travel Plan, how the needs of sustainable transport modes of transport have been prioritised in the design process and provide justification for the level of car parking provided on the site;</li> </ul>
BHLF-KSAR-N8T2-W	<p>I am very much in agreement with the response of Olivers Battery Parish Council.</p> <p>I especially agree with their comments regarding Transport (policy T2)</p>	<p><b>Comments noted</b></p> <p>Noted and no action needed. See response to OB submission above.</p>
BHLF-KSAR-N8T5-Z	<p>Having read the response of Oliver's Battery Parish Council I agree with their views.</p> <p>Particularly their comments regarding :- Transport (policy T2)</p>	<p><b>Comments noted</b></p> <p>Noted and no action needed. See response to OB submission above.</p>

<p>BHLF- KSAR- N8RZ-3</p>	<p>This confirms no parking provision will be supported subject to a short list of circumstances. These factors are subjective, for example what constitutes “easy walking distance of a range of services” needs to be informed in terms of Disability and Age Discrimination legislation.</p> <p>For example explicit statements are needed to define what constitutes suitable access to non-car modes of transport and demonstration required to ensure that the lack of such provision will not be detrimental to the surrounding area or those with limited mobility.</p> <p>In addition avoiding unacceptable increases in on-street parking in any area should be a premise.</p>	<p><b>Comments noted</b></p> <p>All applications need to have a design and access statement so see no reason to amend this.</p> <p>What we are trying to achieve is that development is not bound by parking standards and so are able to justify their own approach through the high quality design process. This will be determined on a case by case basis through the planning application process and the submission of a transport assessment and a design and access statement.</p> <p>We have now included criteria for the provision of parking which will need to be assessed as part of the design process and as part of the application process in para 6.26</p> <p><b>Recommended response:</b> Tweaks to criteria iii in T2 policy lii Residential development proposed with no <b>car</b> parking provision will be supported where it is located in <b>easy</b> walking distance of a range of services and facilities, or there is <b>suitable appropriate</b> access to non-car based modes of transport, and it is</p>
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		demonstrated that the lack of provision will not be to the detriment of the surrounding area or the need of those with limited mobility;
BHLF-KSAR-N8R2-U Hursley Parish Council	<p>Transport and Parking</p> <p>The approach to parking policy by the City Council needs further clarity. The City's Movement Strategy want to move from dependence on the private car and promote other modes of transport. It proposes to do this via Policy T2 which will require the applicant to justify the number of car parking spaces being provided for each new dwelling. The level of provision for residential development will be informed by local circumstances including the layout of the development, the mix of dwellings, the character of the local area and the proximity of public transport. Ref Policy T2ii0</p> <p>However, in the supporting text of the plan ref para 6.24 there is a reference to the 2009 Supplementary Planning Document (SPD) on Residential Parking Standards. (Ref; SPD Parking – <a href="https://www.winchester.gov.uk/planning-policy/winchester-district-local-plan-2011-2036-adopted/supplementary-planning-documents-spds/car-parking-standards-supplementary-planning-document-adopted#:~:text=The%20document%20supplements%20Policy%20T4%20of%20the%20Adopted,following%20the%20public%20consultation%20period%20held%20in%202009.">https://www.winchester.gov.uk/planning-policy/winchester-district-local-plan-2011-2036-adopted/supplementary-planning-documents-spds/car-parking-standards-supplementary-planning-document-adopted#:~:text=The%20document%20supplements%20Policy%20T4%20of%20the%20Adopted,following%20the%20public%20consultation%20period%20held%20in%202009.</a>)</p> <p>This will need to be reviewed. If WCC intend to review the document, it is not clear why it will be for individual applications to justify their own approaches.</p> <p>The criteria set out in Policy T2 ii) include factors which appear of little relevance to what informs the use of the car and the reasons for trips made by households. Only one is relevant ie access to public transport but there</p>	<p><b>Comments noted</b></p> <p>All applications need to have a design and access statement so see no reason to amend this.</p> <p>What we are trying to achieve is that development is not bound by parking standards and so are able to justify their own approach through the high quality design process. This will be determined on a case by case basis through the planning application.</p> <p><b>Recommended response: no change</b></p>

	<p>are a number of others such as proximity of key destinations in terms of cycling and walking, the time it takes to get to them by non-car modes of transport, the quality of the route, the potential for making multi-purpose trips by modes other than the car. None of these are included in the policy. The lack of clarity in the proposed approach will be an issue for landowners and developers seeking to bring land forward. The policy as written will quite likely encourage developers when seeking to secure sites to make their own assumptions as to the level of parking which in turn will have an impact on the value they put on the land ie higher if lower parking provision is made. In this scenario parking provision is squeezed from the outset with the prospect of schemes having insufficient parking leading to unsatisfactory layouts.</p>	
<p>BHLF-KSAR-N87J-R Micheldev er Parish Council</p>	<p>We feel that reducing private car parking spaces will not reduce the number of cars. The only “incentives” to reduce the number of vehicles will be when public / other forms of transport are sufficiently frequent / reliable and affordable.</p>	<p><b>Comments noted</b></p> <p>Comment noted but the LP can’t provide public transport and do not agree that it is not worthwhile reducing the number of private car parking spaces.</p> <p><b>Recommended response: no change</b></p>
<p>BHLF-KSAR-N8BF-Y</p>	<p>Policy T2 should be clarified so that a DAS and Travel Plan are only required in appropriate circumstances, rather than for all development, consistent with the NPPG. The policy implies that the amount of parking for residential development will be determined by the context, but only refers to commercial uses being considered on a case by case basis. Clarification is needed over the requirement for residential parking. Unreasonable requirement for cycle stores to provide charging points.</p>	<p><b>Comments noted</b></p> <p>All applications need to have a design and access statement so see no reason to amend this. What we are trying to achieve is that development is not bound by parking standards and so are able to justify their own approach through the high quality design process. This will be</p>

		<p>determined on a case by case basis through the planning application.</p> <p><b>Recommended response: no change</b></p>
<p>BHLF- KSAR- N86T-1 Hampshire County Council (Transport)</p>	<p>P128 – Policy T2 – Parking for New Developments</p> <p>The County Council would recommend clarifying the policy position regarding what residential parking standards the City Council will expect applicants to consider prior to the new Residential Parking Standards SPD being adopted in case there is a delay in the timetable for approving the new standards.</p> <p>T2 ii)</p> <p>The County Council suggest that there should be somewhere in the policy or the associated text referencing how car parking demand for a new development is assessed and calculated, and what information is expected from the applicant to evidence this. The County Council will also welcome additional information setting out how the applicant should assess ‘on street parking stress’ in the vicinity of the proposed site if there is a risk that parking associated with the development will impact on street parking. The County Council would welcome reference to parking and loading requirements for operational vehicle activities such as delivery vans, servicing vehicles, refuse and recycling vehicles and fire appliances. It is noted that there is also no reference to disabled parking provision and standards and it may be worthwhile clarifying the policy position. In the case of large development sites particularly where lower parking provision is sought and there may be impacts on the highway network then, a requirement for an approved Car Parking Management Plan should be considered.</p> <p>T2 iii)</p> <p>Policy T2 does not consider how the potential impacts on the highway resulting from developments with no car parking or limited parking might be managed. Does the policy need to reference that residents of these</p>	<p><b>Comments noted</b></p> <p><b>Recommended response: changes outlined below</b></p> <p>6.26</p> <p>As part of the design process, the location and treatment of car parking should be carefully assessed and it should be demonstrated through the Design and Access Statement. <b>The criteria for how the scheme is assessed will need to consider the following criteria:</b></p> <p><b>Where is the development located;</b></p> <p><b>Proximity of the site to public transport, services and facilities and whether they are within walking/cycling distance;</b></p> <p><b>Type of dwelling; and</b></p> <p><b>Any other factors such as the nature of provision, occupier and the needs of those with disabilities and reduced mobility</b></p>

	<p>developments may be restricted from applying for on street resident parking permits and/or on street parking restrictions may need to be reviewed. The current wording is a good catch-all but the lack of detail could cause issues in the future or mean developments with no or limited car parking development is difficult to deliver.</p> <p>T2 iv) The policy text refers to secure cycle parking being undercover but there is no information on whether the expectation is for residential cycle parking is to be integral to the building which is considered best practice. The County Council suggests that the text specifies the need to provide enough information as part of the planning application to enable case officers to determine whether there is adequate internal space dimension to accommodate the required level of cycle parking in accordance with best practice. There should be no hanging racks, steps, multiple doors to open and there should be consideration of space requirements for accessing and parking cargo bikes and trikes where appropriate.</p> <p>Commercial developments will be expected to consider the provision of complementary facilities for cyclists such as showers, changing facilities, lockers and drying areas for wet clothes unless otherwise agreed with the Local Planning Authority or Hampshire County Council.</p> <p>The County Council would welcome specific reference to the requirement for developments to comply with relevant standards and best practice guidance such as LTN01/20 or BREEAM Standards if no City or County Council specific guidance is in place at the time of adoption.</p>	<p>The provision of car parking permits will be administered by Hampshire County Council from 1<sup>st</sup> October 2023 and is not considered appropriate for this policy to include the wording suggested.</p> <p><b>Change criteria iv.</b> Secure parking for cycles, e-mobility, mobility scooters or any other form of non car transport <del>must</del> <b>should be integral to the building where possible, and if this is not possible should be</b> provided in a safe and convenient location <del>and should be</del> undercover, with charging points and provided according to the relevant standard or locally specific demand; and</p> <p>Policy T1 has been revised in accordance with this.</p> <p>This has been addressed as a new paragraph after 6.18 in policy T1 where it is more appropriate: 6.19 <b>If cycle infrastructure (cycle lanes, cycle networks, junctions) is</b></p>
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		provided as part of the development this should follow the guidance set out by The Department for Transport's in LTN01/20 or BREEAM Standards. <u>Cycle infrastructure design (LTN 1/20) - GOV.UK (www.gov.uk)</u>
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<b>Comments which object to policy T2 – parking for new developments</b>		
<b>Response ID</b>	<b>Answer</b>	<b>Officer comment</b>
ANON-KSAR-NKNP-8 Otterbourne Parish Council	I believe the public would need to be convinced that no on-site or reduced parking standards is a workable and implementable policy. Such a policy will depend on the public changing their expectation of what is workable in normal life and family needs.	<b>Comment noted</b>  This is exactly what we are trying to achieve with this policy.  <b>Recommended response: no change</b>
ANON-KSAR-NK36-K	The lack of provision of parking spaces will NOT result in less private cars needing to park. Developments need to reflect that households have 2 or 3 cars each and developments should only be allowed when suitable off road parking for this number is available.	<b>Comment noted</b>  The climate emergency demands that we have to reduce private car use and limiting car parking is one way of doing this.  <b>Recommended response: no change</b>
ANON-KSAR-NKQ5-G	The policy is applicable to Winchester Town, where employment and national rail services are within reach by public transport, cycling or on foot.	<b>Comment noted</b>

<p>Curdrige Parish Council</p>	<p>In paragraph 6.25 line 2, add "only" after "supported"</p> <p>It is inappropriate for the two-thirds of the district that is rural, including market towns and MDAs. Housing built in these areas will generally require residents to use cars to get to work, as bus services do not provide a realistic way to get to most sites of employment. Standards from the existing Local Plan should continue to apply outside Winchester Town. (If you want evidence of the social cost of inadequate on-site parking, visit north Whiteley. Driving along Bluebell Way is mad hazardous by vehicles parked on the road and footways).</p>	<p>Do not agree insertion of this word is needed. Don't agree with this comment there are other sustainable locations within the district that are not within Winchester Town where this could apply.</p> <p><b>Recommended response: no change</b></p>
<p>ANON-KSAR-NKS3-G Bishops Waltham Parish Council</p>	<p>There is no justification for the removal of the standard parking allocation. The installation of car charging points in all new dwellings would require at least one parking space per dwelling.</p>	<p><b>Comments noted</b></p> <p>Only where parking is provided on developments will EV charging be required.</p> <p><b>Recommended response: no change</b></p>
<p>ANON-KSAR-NKHU-7 Oliver's Battery Parish Council</p>	<p>Transport and Parking (Policy T2)</p> <p>Mitigating and adapting to climate change and designing for low carbon infrastructure are described as vitally important and defining issues for the Local Plan. It is also noted that the Local Plan has a key role in assisting WCC with meeting its net zero target by 2030.</p> <p>The Local Plan prioritises development towards sustainable transport modes of travel which includes ultra-low and zero carbon emission vehicles, while recognising that it may not be possible to completely rule out the use of the private car (this is not just due to the rural nature of the district but also the availability of alternative means of transport as well as the needs and wants of people to continue to use cars).</p> <p>Policy T2 requires developers to, as part of the design process, to</p>	<p><b>Comments noted</b></p> <p>All applications need to have a design and access statement so see no reason to amend this.</p> <p>What we are trying to achieve is that development is not bound by parking standards and so are able to justify their own approach through the high quality design process. This will be determined on a case by case basis</p>



<p>demonstrate why they are planning for the number of car parking spaces in their developments and to be able to demonstrate how their proposal is linked to bus stops, Public Rights of Way and cycle route not just within the site boundary.</p> <p>The level of provision for residential development will be informed by listed local circumstances.</p> <p>The criteria set out in Policy T2ii include factors which appear of little relevance to what informs the use of the car and the reasons for trips made by households. There are several others such as proximity of key destinations in terms of cycling and walking, the time it takes to get to them by non-car modes of transport, the quality of the route, topography, the potential for making multi-purpose trips by modes other than the car.</p> <p>Policy T2iii confirms no parking provision will be supported subject to a short list of circumstances. These factors are subjective, for example what constitutes “easy walking distance of a range of services and facilities”, “suitable access to non-car based modes of transport”, and what demonstration will be required “that the lack of provision will not be to the detriment of the surrounding area or the need of those with limited mobility”? Regarding this last circumstance, the following words, based on Policy H9iii, should be added “including avoiding unacceptable increases in on-street parking in the surrounding area”.</p> <p>Parking may be limited with the proposed policy and, if so, there is likely to be inadequate provision of safe EV charging points. This is entirely contrary to what is described as the vital importance and a defining issue of mitigating and adapting to climate change and designing for low carbon infrastructure for the draft Local Plan as well as being a key in assisting the WCC with meeting its net zero target by 2030.</p> <p>OBPC considers requiring justification for the number of car parking spaces for each new dwelling is entirely the wrong approach.</p> <p>Notwithstanding the importance of mitigating climate change, the current approach of a Supplementary Planning Document (SPD) on Residential</p>	<p>through the planning application process and the submission of a transport assessment and a design and access statement.</p> <p>We have now included criteria for the provision of parking which will need to be assessed as part of the design process and as part of the application process in para 6.26</p>
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	<p>Parking Standards, which identifies the standards expected with developers having to justify any discrepancies, rather than every application having to include justification for the number of car parking spaces proposed is infinitely preferable.</p> <p>The policy proposed in the draft Local Plan will have significant impact on WCC resources, requiring subjective decisions and lead to different and potentially inconsistent outcomes for similar scenarios.</p> <p>Policy T2 should include an SPD on Residential Parking Standards which ensure every home has a safe place to charge EV. This will help include more certainty for all parties and also help reduce the number of vehicles parked on residential roads and pavements to the detriment of surrounding areas and those with limited mobility. OBPC look forward to the consultation on the SPD.</p>	<p>Where parking is provided, an EV charging point must be provided.</p> <p>Same comment as above. Should probably exclude householder applications.</p> <p><b>Recommended response: no change</b></p>
<p>ANON-KSAR-NKDW-5 Littleton and Harestock Parish Council</p>	<p>1. The policy sets out a new approach whereby rather than set standards for parking provision to be complied with and any reductions to be justified by the developer, WCC now propose that it is for developers to make the case for the number of spaces provided. The intention is to seek a reduction in parking provision in favour of more sustainable forms of transport.</p> <p>2. Littleton and Harestock Parish Council is very concerned that this new approach will not deliver the outcomes intended by WCC. By setting standards for parking in a local plan all developers know what is required, should they choose to bring forward a site. The new policy could encourage developers to promote sites with lower parking provision and to reflect that approach in any agreements with landowners. In those instances where WCC did not accept a lower standard it would now be for it to justify its decision which would most likely generate more work for officers. It could also be more difficult to increase the number of parking spaces given the commercial decisions taken by the developer who may seek to minimise any cost implications at the expense of other policy requirements.</p>	<p><b>Comments noted</b></p> <p>All applications need to have a design and access statement so see no reason to amend this.</p> <p>What we are trying to achieve is that development is not bound by parking standards and so are able to justify their own approach through the high quality design process. This will be determined on a case by case basis through the planning application.</p> <p><b>Recommended response: no change</b></p>

	<p>3. The implications of insufficient parking on a new development can have a significant impact on adjoining areas. Littleton and Harestock Parish Council is concerned that the approach is likely to create parking issues for existing and new residents. WCC are basing the approach on the availability of alternative means of travel particularly public transport, over which it has no control and consequently a serious weakness for the Plan. Littleton and Harestock Parish Council objects to the policy.</p> <p>Object to Policy T2. The policy is likely to deliver schemes where the lack of parking becomes a serious design and social issue.</p>	
ANON-KSAR-NKJ4-8	<p>Please see accompanying Representations</p> <p>Policy T2 – Parking for New Developments</p> <p>5.14 The supporting text for this policy sets out that the Parking standards will be updated to reflect the climate emergency (paragraph 6.24). The new standards will move away from an onus on private car ownership and developers will need to justify why they are planning for the number of parking standards proposed.</p> <p>5.15 Vistry Partnerships support the premise of this, but it is important that new developments are still designed to accommodate satisfactory levels of parking to ensure safety and attractiveness within developments and reduce the potential for unallocated on-street parking, which would detract from placemaking objectives. Whilst we appreciate that the policy is based on new parking standards, it is recommended that some degree of flexibility is built into the policy to ensure flexibility in the application of the standards.</p>	<p><b>Comments noted and support welcomed</b></p> <p>All applications need to have a design and access statement so see no reason to amend this.</p> <p>What we are trying to achieve is that development is not bound by parking standards and so are able to justify their own approach through the high quality design process. This will be determined on a case by case basis through the planning application process and the submission of a transport assessment and a design and access statement.</p> <p>We have now included criteria for the provision of parking which will need to be assessed as part of the design</p>

		<p>process and as part of the application process in para 6.26</p> <p><b>Recommended response: no change</b></p>
<p>ANON-KSAR-NK1Z-N Shedfield Parish Council</p>	<p>This policy is inappropriate in rural villages due to a lack of services and facilities.</p> <p>Even in Urban areas, there is a need for residents and visitors to commute, making travel by private car essential for the majority.</p>	<p><b>Comment noted</b></p> <p>This is recognised in the policy</p> <p><b>Recommended response: no change</b></p>
<p>ANON-KSAR-NKJV-A</p>	<p>The supporting text currently refers to the need for the 2009 Parking Standards SPD to be updated, with new standards being consulted upon “in due course”. It is impractical to require developers to justify their proposed approach to parking without updated parking standards firstly being in place providing guidance and benchmarks for this, alongside appropriate evidence.</p>	<p><b>Comment noted</b></p> <p>The point is that they are not bound by parking standards and so are able to justify their own approach.</p> <p><b>Recommended response: no change</b></p>
<p>ANON-KSAR-N8YU-5</p>	<p>The criteria set out in Policy T2ii include factors which appear of little relevance to what informs the use of the car and the reasons for trips made by households. There are several others such distance of key destinations in terms of cycling and walking, the time it takes to get to them by non-car modes of transport, topography, etc.</p> <p>Policy T2 should include an SPD on Residential Parking Standards which require every home to have enough car parking spaces including a safe place to charge EV. This will help reduce the number of vehicles parked on residential roads and pavements to the detriment of surrounding areas and those with limited mobility.</p>	<p><b>Comment noted</b></p> <p>This is a repeated comment. The point is that if a scheme is car free then they won't need EV charging points</p> <p><b>Recommended response: no change</b></p>

ANON-KSAR-NKFD-M	<p>It would be foolish to allow new developments to make no allowance for parking if "... it is located in easy walking distance of a range of services and facilities, there is suitable access to non-car based modes of transport, and it is demonstrated that the lack of provision will not be to the detriment of the surrounding area". This would assume that public or other non-car based transport will be available to meet peoples' needs which could include transport to remote places. While we might wish it, this would be a triumph of hope over expectation</p>	<p><b>Comments noted</b></p> <p>The target date for carbon neutrality is not within the remit of the Local Plan. The Local Plan's aims are to help achieve this council wide target.</p> <p>The Local Plan acknowledges that it will not always be possible to achieve these policies in all areas of the district, especially the more rural villages. But these will all be considered as part of the planning application/masterplan by the development management teams.</p> <p>The point is that they are not bound by parking standards and so are able to justify their own approach. This will be determined on a case by case basis</p> <p><b>Recommended response: no change</b></p>
ANON-KSAR-NKN1-9	<p>The aim for carbon neutrality by 2030 is not possible. A more realistic target should be made. 2040 might be more achievable. It is not acceptable to make assumptions that there will be acceptable alternative travel facilities available. The car will remain a fundamental human right. Public transport is provided by private business and profit is the business motivation. They are not altruistic businesses and cannot be relied on. People will need to commute to work, to visit family and friends and travel out of the local area. Public transport facilities will never meet all of this</p>	<p><b>Comments noted</b></p> <p>The target date for carbon neutrality is not within the remit of the Local Plan. The Local Plan's aims are to help achieve this council wide target.</p>

	<p>demand. Failure to provide adequate parking/garaging will lead to congestion and could lead to real conflict. The council should set down the parking standards required for the development and this should be based on a minimum requirement modelled on existing figures perhaps an average of 2 vehicles per dwelling this may allow for some visitor parking. The figure should be increased for larger homes.</p>	<p>The Local Plan acknowledges that it will not always be possible to achieve these policies in all areas of the district, especially the more rural villages. But these will all be considered as part of the planning application/masterplan by the development management teams.</p> <p>The point is that they are not bound by parking standards and so are able to justify their own approach. This will be determined on a case by case basis in accordance with the criteria now included in paragraph 6.26</p> <p><b>Recommended response: no change</b></p>
ANON-KSAR-N8YA-H	<p>Out of town or village developments should only be permitted where there is adequate public transport available to/from the development for the long term.</p>	<p><b>Comment noted</b></p> <p>This is what the policy is aiming for.</p> <p><b>Recommended response: no change</b></p>
ANON-KSAR-N8GP-E Denmead Parish Council	<p>Denmead has a large population for a village but very poor public transport provision with no evening or Sunday services at all. Even Uber won't come here. Car use is essential and the current parking provision is insufficient making people park on pavements which hinders those with pushchairs or in wheelchairs. We can't even get to the hospital which is just a few miles away using public transport. Within curtilage garages should be provided if possible, preferably with a requirement that they are retained in perpetuity.</p>	<p><b>Comment noted</b></p> <p>For Neighbourhood Plan.</p> <p><b>Recommended response: no change</b></p>

ANON-KSAR-N85K-Q	<p>Policy T2 – Parking for New Developments</p> <p>9.1 The supporting text for this policy (at paragraph in 6.24 of the Draft Local Plan) sets out that WCC’s parking standards will be updated to reflect the Climate Emergency. It is explained that the new standards will move away from an onus on private car ownership and added that developers will need to justify why they are planning for the number of parking bays proposed.</p> <p>9.2 Croudace understands the premise of this approach. However, it is important that new developments are still designed to accommodate satisfactory levels of parking to ensure safety and attractiveness within developments. This is noting that car ownership levels are not expected to reduce, but rather the fleet composition is likely to become comprised of electric vehicles.</p>	<p><b>Comment noted</b></p> <p><b>Recommended response: no change</b></p>
ANON-KSAR-NKDM-U Wonston Parish Council	As previously, car use cannot be reduced in rural communities until public transport etc is improved.	<p><b>Comment noted</b></p> <p>Noted already covered by policy</p> <p><b>Recommended response: no change</b></p>
ANON-KSAR-N8XZ-9 Denmead Parish Council	<p>"Residential development proposed with no parking provision will be supported ..."</p> <p>This is a ridiculous policy in the rural areas where many settlements/villages have next-to-no services and no public transport.</p>	<p><b>Comment noted</b></p> <p>No change needed the policy, it accepts that this won't be possible in some areas</p> <p><b>Recommended response: no change</b></p>
ANON-KSAR-N8GX-P	<p>You need to take into account the lack of parking.</p> <p>You need to take into account that many households now have at least 2 and possibly more cars when they have an adult occupation.</p> <p>You need to take into account the lack of public transport.</p> <p>You need to take into account building a garage doesn't mean that home</p>	<p><b>Comment noted</b></p> <p>These will all be considered as part of the planning application/masterplan by the development management</p>

	<p>owners will park in it. You need to take into account the width of roads for emergency vehicles when roads are narrow and people have to park in the road.</p>	<p>teams. The point is that they are not bound by parking standards and so are able to justify their own approach. This will be determined on a case by case basis</p> <p><b>Recommended response: no change</b></p>
ANON-KSAR-NKME-V	<p>The policy should refer to the need to comply with adopted parking standards.</p> <p>The supporting text currently makes reference to the need for the 2009 Parking Standards SPD to be updated, with new standards being consulted upon “in due course”. It is impractical to require developers to justify their proposed approach to parking without updated parking standards firstly being in place offering guidance and benchmarks for this.</p>	<p><b>Comments noted</b></p> <p>Agree but we don't have updated ones yet. The need to review is in the policy preamble.</p> <p><b>Recommended response: no change</b></p>
ANON-KSAR-N81F-E	<p>Policy T2 should be clarified so that a DAS and Travel Plan are only required in appropriate circumstances, rather than for all development, consistent with the NPPG. The policy implies that the amount of parking for residential development will be determined by the context, but only refers to commercial uses being considered on a case by case basis. Clarification is needed over the requirement for residential parking.</p> <p>Clarification is needed such that it is not a requirement for charging points for standard cycle stores.</p>	<p><b>Comments noted</b></p> <p><b>Recommended response: <u>Amendments to policy T2</u></b> New development, <b>excluding householder development</b>, will only be permitted where;</p>
ANON-KSAR-N8XH-Q	<p>Every dwelling should have an allocated parking space with EV charging. It is not the ownership of a vehicle that causes problems but how and when it is used. A small EV used out of peak hours is a very green and community friendly approach.</p>	<p><b>Comments noted</b></p> <p>This will come in with building regulations at some point.</p>



		<b>Recommended response: no change</b>
ANON-KSAR-N81T-V Sparsholt Parish Council	There are real issues about parking for new development planning where there could be too few parking spaces. It is unrealistic where multi-generational families exist and there is a requirement for extra car spaces for visitors, emergency vehicles and service vehicles. Even electric cars require spaces. And significant (re)developments require review to ensure public transport is sufficient to meet new needs eg extensive redevelopment of Chilbolton Avenue with no provision of bus stops.	<p><b>Comments noted</b></p> <p>The point is that they are not bound by parking standards and so are able to justify their own approach. This will be determined on a case by case basis</p> <p><b>Recommended response: no change</b></p>
ANON-KSAR-N8GA-Y	<p>Please see introductory comments on T1</p> <p>Suggested revised text:</p> <p>Strategic Policy T2 P128 Parking for New Developments</p> <p>New development will only be permitted where:</p> <p><u>i. The applicant can demonstrate in the Design and Access Statement and the <del>Travel Transport and Movement</del> Plan <u>with an emissions impact statement</u>, how the needs of sustainable transport modes of transport have been <del>prioritised given precedence</del> in the design process <del>and provide justification for the level of car parking provided on the site</del>;</u></p> <p><u>ii. <del>Developers will be expected to have a practical plan that will reduce the need for parking spaces. New developments will not normally be permitted unless they are within 15 minutes of a bus stop on a bus route with a daytime (0700 to 1900) frequency of at least every</del></u></p>	<p><b>Comments noted</b></p> <p>Requiring applications to submit an emissions impact assessment is not achievable as we are unable to know what type of vehicle future occupiers would have and this assessment relies heavily on knowing this data. Too prescriptive and such as bus frequencies is outside of the scope of the Local Plan.</p> <p>All applications need to have a design and access statement so see no reason to amend this.</p> <p>What we are trying to achieve is that development is not bound by parking</p>

	<p><u>30 minutes and at least three evening services; and unless they are accessible from essential facilities (see Appendix listing these) by safe, well-lit off-road cycle, mobility scooter and walking routes. Developers are required to include plans and funding for establishing these where they do not exist.</u></p> <p><del>ii-iii.</del> The parking provision on residential development including for visitors shall take account of local circumstances including the layout of the development, the mix of dwellings, the character of the local area and the proximity of public transport, <u>The normal standard will be no more than 1.2 spaces per dwelling and steps must be proposed to prevent parking outside parking spaces,</u> and,</p> <p><del>iii-iv.</del> Residential development proposed with no parking provision will be <u>supported encouraged especially where the development complies with (ii) above where it is located in easy walking distance of a range of services and facilities, or there is suitable access to non-car based modes of transport, and or where</u> it is demonstrated that the lack of provision will not be to the detriment of the surrounding area or the need of those with limited mobility;</p> <p><del>iv-v.</del> Secure parking for cycles, e-mobility, mobility scooters or any other form of non car transport must be provided in a safe and convenient location and should be undercover, with charging points and provided according to the relevant standard or locally specific demand; and</p> <p><del>v-vi.</del> Parking for commercial uses will be considered on a case by case basis.</p>	<p>standards and so are able to justify their own approach through the high quality design process. This will be determined on a case by case basis through the planning application process and the submission of a transport assessment and a design and access statement.</p> <p>We have now included criteria for the provision of parking which will need to be assessed as part of the design process and as part of the application process in para 6.26</p>
ANON-KSAR-N8VW-4	As per Cycle Winchester and WinACC responses	<p><b>Comments noted</b></p> <p><b>Recommended response: no change</b></p>
ANON-KSAR-N81B-A	If you limit parking in new developments, people will park to clog the street, and park on the pavements. Especially in new developments with narrow little roads.	<b>Comment noted</b>

	<p>Bus services are not good enough to compensate not using parking and making a step change, you can't expect people to 'step change' if the alternatives are not there. They may want a car at the weekends or evenings.</p>	<p>No change to policy we have to try to reduce reliance on cars.</p> <p><b>Recommended response: no change</b></p>
<p>ANON-KSAR-N8WC-H</p>	<p>The level of provision for residential development will be informed by listed local circumstances.</p> <p>The criteria set out in Policy T2ii include factors which appear of little relevance to what informs the use of the car and the reasons for trips made by households. There are several others such as proximity of key destinations in terms of cycling and walking, the time it takes to get to them by non-car modes of transport, the quality of the route, topography, the potential for making multi-purpose trips by modes other than the car.</p> <p>Policy T2iii confirms no parking provision will be supported subject to a short list of circumstances</p>	<p><b>Comments noted</b></p> <p>The point is that they are not bound by parking standards and so are able to justify their own approach. This will be determined on a case by case basis</p> <p><b>Recommended response: no change</b></p>
<p>ANON-KSAR-NKX6-R</p>	<p>The policy you are proposing may work for inner city areas, but not for MTRAs. Car parking provision per dwelling should remain as the current policy, but with electric charge points in all new build. Car use in MTRAs will not reduce just because there is no built-in provision, it will simply put pressure on street parking in residential roads that will in turn impinge on environmental, safety and living standards. Retain requirement for parking provision per dwelling.</p>	<p><b>Comments noted</b></p> <p>The policy does recognise the difficulties in some areas within the district.</p> <p><b>Recommended response: no change</b></p>
<p>ANON-KSAR-NKQN-9</p>	<p>Further to our comments and suggested edit of policy T1, we suggest the following amendment to policy T2:</p> <p>p.128, T2: Active and sustainable travel in new developments To help achieve a net zero city by 2030, to support the sustainable growth</p>	<p><b>Comments noted</b></p> <p>We have now made reference to the LTN1/20 guidance from Department</p>

	<p>of Winchester and the District and to improve accessibility, health and environmental quality of the city and District, development will be required to make provision in the following order of priority:</p> <ol style="list-style-type: none"> <li>1. Provision for active travel by: <ol style="list-style-type: none"> <li>i. Ensuring a dense and permeable network of coherent, direct, safe, comfortable and attractive walking and cycling routes within developments and connecting into the wider active travel network. These routes should conform to Cycle Infrastructure Design standards in LTN1/20 and any subsequent revisions.</li> <li>ii. Delivering early development phases as close as possible to existing walking and cycling routes and establishing usable walking, wheeling and cycling connections in the early phases of development.</li> <li>iii. Creating an environment which is safe and attractive to pedestrians, cyclists, wheelchair and mobility scooter users, and users of emerging modes of transport. This includes adopting 20mph as the default maximum speed limit.</li> <li>iv. Including secure private cycle storage (including for e-cycles and cargo cycles) with charging facilities for all dwellings.</li> <li>v. Including secure public cycle parking (including for e-cycles and cargo cycles) in line with the Bicycle Association UK cycle parking standards.</li> </ol> </li> <li>2. Provision for public transport and shared mobility by: <ol style="list-style-type: none"> <li>i. Ensuring densities, layouts and design which allow the provision of prioritised, frequent, reliable and attractive public transport services to, and where relevant, within the site.</li> <li>ii. Delivering appropriately located bus stops, with raised kerbs for easy bus access and, where appropriate, suitable routes for bus priority.</li> <li>iii. Allocating spaces for shared mobility vehicles including car clubs and e-cycles in central and accessible locations.</li> <li>iv. Supporting new local multi-modal transport hubs, interchanges and local cargo facilities and providing secure (e)-cycle storage and charging facilities in line with national cycle parking standards, making best use of existing bus, rail and walking and cycling routes.</li> </ol> </li> </ol>	<p>for Transport. This is in new paragraph 6.19 as well as ensuring secure cycle parking which is integral to the dwelling where possible.</p> <p>Unfortunately a lot of your suggestions including that of setting speed limits are outside of the remit of the Local Plan</p> <p><b>Recommended response: no change to the policy</b></p>
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	<p>v. Adopting 20mph as the default maximum speed limit.</p> <p>3. Provision for electric vehicles by:</p> <p>i. Ensuring access to electric vehicle charging points for occupiers of all major development.</p> <p>ii. Delivering additional public charging points within the development.</p> <p>4. Provision of highway enhancements where they are necessary for safety, where they promote an overall reduction in car journeys, where they make improvements to the local environment or where they are required to enable access to a development site.</p> <p>5. Increases in local road capacity only where severe development impacts on the transport network cannot be avoided by the active and sustainable travel investments proposed with the development.</p> <p>6. Encouragement of proposals for car-free development when accompanied by an appropriate assessment of transport demand and impact.</p>	
ANON-KSAR-NK6N-E	<p>This is all seems fuzzy and we suspect developers will have no trouble getting round the vagueness of this policy. It is also somewhat incoherent: e.g. the text around residential development without parking suggests that suitable access to non-car-based modes is only required for this subset of developments, when T1 requires such access for all developments. The policy should stress that the location of parking for a development should come second to the access to non-car-based modes (i.e. that parked cars should not be in the way of people making good transport choices).</p> <p>The assertion of a ‘traffic hierarchy’ that inverts the current presumption of cars first, is laudable and reflects what we have asked for for decades. Putting the car in its proper place not only has advantages for active and sustainable travel, but for asserting a different priority for space and emphasising the public realm. Houses with gardens or houses with communal green space are much to be preferred than houses with parked cars (see Transport for New Homes: “Building Car Dependency”). There is nothing in T2 that prevents the usual car-dominated estate design.</p>	<p><b>Comments noted</b></p> <p>The point is that they are not bound by parking standards and so are able to justify their own approach. This will be determined on a case by case basis</p> <p><b>Recommended response: no change</b></p>

	<p>Suggested additions: 1) The parking provision for new developments should be specifically defined and requirements put in that prevent use of public highway to supplement such parking; 2) if gardens or communal green space is provided by a development, it should not be used for parking; 3) parking design should be such that access to non-car-based modes and to shops and other facilities is easier than access to the parking.</p>	
<p>BHLF- KSAR- N8BD-W</p>	<p>Strategic Policy T2 - Parking for New Developments Objections and comments Paragraph ii: This refers to the amount of parking provided and the factors to be taken into account which are general in nature and so may not lead to a reduction in parking spaces as expected. Current practice in new developments tends to provide generous amounts of car parking and more parking spaces can encourage more car use. Fewer parking spaces are more likely to be part of new developments if guidance is given on the number of spaces likely to be acceptable per dwelling in developments outside town centres. Paragraph iii: This refers to developments where no parking is provided, such as in town centres, but given the current pressure to provide parking, the wording should be more directive. Instead of using the word “supported” it should be made more definite by using the words “encouraged” or “expected” for example, and any parking proposed on such sites should have to be justified by the developer. The meaning of the phrase “will not be to the detriment of the surrounding area” is not clear and needs to be redrafted. Paragraph v: Greater clarity is needed as to the factors to be taken into account in assessing the need for commercial parking. Clearly there is a need for parking for service vehicles.</p>	<p><b>Comments noted</b></p> <p>This will be determined on a case by case basis</p> <p><b>Recommended response: no change</b></p>

BHLF- KSAR- N86N-U	Policy T2 should be clarified so that a DAS and Travel Plan are only required in appropriate circumstances, rather than for all development, consistent with the NPPG. The policy implies that the amount of parking for residential development will be determined by the context, but only refers to commercial uses being considered on a case by case basis. Clarification is needed over the requirement for residential parking. Clarification is needed such that it is not a requirement for charging points for standard cycle stores.	<p><b>Comments noted</b></p> <p><b>Recommended response:</b> <b><u>Amendments to policy T2 (show in track changes).</u></b> New development, <b>excluding householder development</b>, will only be permitted where;</p>
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<b>Comments which did not answer whether they support, object or neither support or object to policy T2 – parking for new developments</b>		
<b>Respondent number</b>	<b>Comment</b>	<b>Officer comment</b>
BHLF- KSAR- N8RJ-K	<p>9.4 The supporting text for this policy (at paragraph in 6.24 of the Draft Local Plan) sets out that WCC’s parking standards will be updated to reflect the Climate Emergency. It is explained that the new standards will move away from an onus on private car ownership and added that developers will need to justify why they are planning for the number of parking bays proposed.</p> <p>9.5 Catesby understands the premise of this approach. However, it is important that new developments are still designed to accommodate satisfactory levels of parking to ensure safety and attractiveness within developments. This is noting that car ownership levels are not expected to reduce, but rather the fleet composition is likely to become comprised of electric vehicles.</p> <p>9.6 Overall, effective parking standards are still necessary, as a failure to properly plan for car parking can lead to on-street parking, to the detriment of the street scene, as well as the unimpeded movement of emergency vehicles, cyclists, and pedestrians</p>	<p><b>Comments noted</b></p> <p>The point is that they are not bound by parking standards and so are able to justify their own approach.</p> <p><b>Recommended response: no change</b></p>

<p>BHLF- KSAR- N8ZD-N</p>	<p>Policy T2 – Parking for New Developments 9.1 The supporting text for this policy (at paragraph in 6.24 of the Draft Local Plan) sets out that WCC’s parking standards will be updated to reflect the Climate Emergency. It is explained that the new standards will move away from an onus on private car ownership and added that developers will need to justify why they are planning for the number of parking bays proposed. 9.2 Croudace understands the premise of this approach. However, it is important that new developments are still designed to accommodate satisfactory levels of parking to ensure safety and attractiveness within developments. This is noting that car ownership levels are not expected to reduce, but rather the fleet composition is likely to become comprised of electric vehicles.</p>	<p><b>Comments noted</b></p> <p>The point is that they are not bound by parking standards and so are able to justify their own approach.</p> <p><b>Recommended response: no change</b></p>
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<b>Comments moved from other topics</b>		
	<b>Recommendations</b>	<b>Officer response</b>
<p>ANON-KSAR-NK6N-E</p>	<p>T2 iii) suggests that some housing could be car-free. What kind of parking does not have vehicular access?</p>	<p><b>Comments noted</b></p> <p>The point is that they are not bound by parking standards and so are able to justify their own approach.</p> <p>What we are trying to achieve is that development is not bound by parking standards and so are able to justify their own approach through the high quality design process. This will be determined on a case by case basis through the planning application process and the submission of a transport assessment and</p>



		<b>Recommended response: no change</b>
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	<b>Recommendations</b>	<b>Officer response</b>
Comments from SA/HRA	Policy T2 could be strengthened by requiring that parking provision on residential development to take account of a wide range of user types, to include those with disabilities and reduced mobility.	Policy T2 now includes a criterion that requires the assessment of proposals which include parking to consider issues such as the nature of provision, occupier and the needs of those with disabilities and reduced mobility

#### Amendments to Policy T2

#### Amendments to supporting text

6.26 As part of the design process, the location and treatment of car parking should be carefully assessed and it should be demonstrated through the Design and Access Statement. **The criteria for how the scheme is assessed will need to consider the following criteria:**

- **Where is the development located;**
- **Proximity of the site to public transport, services and facilities and whether they are within walking/cycling distance;**
- **Type of dwelling; and**
- **Any other factors such as the nature of provision, occupier and the needs of those with disabilities and reduced mobility**

Para 6.30 to moved back to after 6.27, new para 6.28 and elaborate on this and move picture with it.

#### Amendments to policy T2

New development, **excluding householder development**, will only be permitted where:

- i. The applicant can demonstrate in the Design and Access Statement, **Transport Assessment** and the Travel Plan, how the needs of sustainable transport modes ~~of transport~~ have been prioritised in the design process and provide justification for the level of car parking provided on the site;
- ii. The parking provision on residential development including for visitors shall take account of local circumstances including the layout of the development, the mix of dwellings, the character of the local area and the proximity of public transport, and,
- iii. Residential development proposed with no **car** parking provision will be supported where it is located in ~~easy~~ walking distance of a range of services and facilities, or there is ~~suitable~~ **appropriate** access to non-car based modes of transport, and it is demonstrated that the lack of provision will not be to the detriment of the surrounding area or the need of those with limited mobility;
- iv. Secure parking for cycles, e-mobility, mobility scooters or any other form of non-car transport must be provided in a safe and convenient location and should **be integral to the building where possible, and if this is not possible should be** undercover, with charging points ~~and provided~~ **designed** according to the relevant standard or locally specific demand **and any health and safety requirements**; and
- v. Parking for commercial uses will be considered on a case by case basis.