

Response ID ANON-81EK-G8FN-C

Submitted to Essex Parking Guidance Consultation 2023
Submitted on 2023-12-07 09:50:25

Introduction / Respondent information

Are you responding to the consultation as....

Organisation

About you as an organisation

What is the Organisation you are responding on behalf of? (name and address)

Name::
Tendring District Council

Address::

Town Hall
Station Road
Clacton on Sea

Post code:
CO15 1SE

What is your role within the organisation?

Role:
Planning Policy Team Leader

Part 1 Parking Guidance

1a In reference to section 2.20, Do you agree or disagree with using a zonal approach to determine parking standards?

Fairly Agree

1b Please can you provide us with your views on the proposed accessibility approach? Are there any other factors you would expect to be taken into account when considering accessibility and why?

comments:

The Council has concerns about the quality of the mapping presented in the consultation document and would require much greater levels of clarity and detail to be able to implement such an approach. Digital mapping tools or GIS data would be welcomed, in order to assist decision-makers.

The accessibility approach is considered to represent a step in the right direction to ensure sustainable development in the right location and to avoid an over-dependence on private vehicle ownership. This approach also accords with national planning policy, which states that local parking standards should take into account the accessibility of a development.

However, national planning policy also states that local car ownership levels should be taken into account. Moreover, local demographics should also be considered when setting the accessibility credentials of an area. For example, areas where there are higher levels of elderly residents (or likely to be in the future) would probably score lower in terms of accessibility, as residents would be more reliant on private motor vehicle.

Local parking standards should also take into account the variety/quantum of facilities and services present within the relevant urban area along with public transport links. The quality and siting of cycle routes/pedestrian infrastructure should also be considered, to fully appreciate the accessibility of an urban area (I.e. can future residents safely walk or cycle to the relevant urban area).

2a In reference to section 2.30, National guidance requires clear and compelling evidence to set maximum standards. For 1-bedroom dwellings in highly accessible locations a maximum is still applied, all other standards are minimums. Do you agree or disagree with the suggested approach?

Strongly Agree

2b What other contexts are there aside from highly accessible developments where maximum standards could be relevant or effective?

comments box:

No comments.

3a In reference to section 2.42-2.45, Do you agree or disagree with the guidance on enforcement, with greater emphasis on enforcing parking from first occupation of development?

Strongly Agree

3b If you were to change this section what amendments would you like to see included?

Comments:

In addition to attractors such as rail stations and employment areas which lead to inappropriate use of residential parking, recreational attractors such as beaches, which cause significant parking pressures within the District's coastal communities, should also be explicitly referenced in this section.

4a In reference to section 3, Do you agree or disagree with the updated guidance relating to cycle parking standards and design?

Fairly Agree

4b If you were to change this section what amendments would like to see included?

comments:

Within Table 3-1, further clarity around the phrase "To be considered on a case-by-case basis" would be welcomed. Parameters such as e2xisting secure, covered public cycle storage within X metres of the site" would ensure a consistent application of the Standards.

Also within Table 3-1, requiring provision for changing area, lockers and showers is a positive step in encouraging cycling to work but this needs to be reasonably related to the floorspace proposed. It would not be reasonable to expect small B2 and B8 units to provide all three. Consideration should be given to a floorspace threshold, below which showers are not required. The same standards should also apply to use classes E(g) i, ii, and iii (offices/light industrial).

5a In reference to section 4, Do you agree or disagree with the updated guidance relating to electric vehicle parking standards and design?

Fairly Agree

5b If you were to change this section what you would like to see included?

comments:

A clear definition of the scope encompassed by the term "all new development" (refer to para 4.3) would greatly assist decision-makers. For instance, it would be beneficial to ascertain whether "all new development" incorporates both partial and complete conversion schemes. Clarity regarding the exclusion criteria for smaller development proposals from the stipulated electric vehicle infrastructure requirements would also be welcomed.

6a In reference to section 8, Do you agree or disagree with the updated numerical parking standards?

Fairly Agree

6b Based on your experience, what changes would you make to the standards for particular land uses?

comments:

The Council is concerned that specific development proposals (such as Retirement developments, residential care homes, HMOs, and Hostels) tend to offer parking provisions that fall below or significantly below the prevailing parking guidance and standards in place at the time to facilitate informed decision-making, providing decision-makers with comprehensive or summarised background data and evidence concerning vehicle parking standards for these particular types of developments would be beneficial. This should encompass an examination of the likely implications on highways resulting from subpar parking provisions, supported by clear evidence, to enhance the effectiveness of the assessment process.

6c Based on your experience, what changes would you make to the numerical standards for high, medium and low accessibility areas?

comments:

Without access to the underlying data and evidence supporting the specific numerical parking standards for areas categorized as high, medium, and low accessibility, it is difficult to propose any meaningful modifications.

7 Do you have any other comments relating to Part 1 Parking guidance?

comments:

Tendring District Council welcome the updated parking standards, and see the value in having clearly defined guidance that brings certainty to developers and decision-makers. The document responds well to the diverse nature of settlements within Essex, taking a considered and proportionate approach to parking standards that reflects the needs of both rural and urban areas.

Para 3.5 is a welcome addition: "It is essential that cycle parking is designed into a development at an early stage, prior to the granting of planning permission to ensure it relates well to the development". This will ensure cycle parking can be included in the most suitable location within the

development with good surveillance etc.

Table 4-1: Electric Vehicle Parking Standards is also welcomed, and reflects the Council's ambition to see more EV parking provision within the District.

Part 2 Parking Guidance

1a In reference to section 1.1 - 1.4, The guidance suggests a different approach to Part 1 for Garden Communities and large-scale developments of around 1,000 dwellings or more. Do you agree or disagree with this approach?

Neither Agree nor Disagree

1b What approach would you take to the two parts of the guidance or the scale thresholds?

comments:

1,000 units is a reasonable threshold to start employing more progressive parking standards and the accessibility tool provides an appropriate mechanism for assessing the degree to which provision should be reduced.

2a In reference to section 2, Do you agree or disagree with the outcomes that the parking approach in Garden Communities and large-scale developments seeks to support?

Strongly Agree

2b What changes would you make to the outcomes?

comments:

No comments.

3a In reference to section 3, Do you agree or disagree that the supporting measures outlined above will be needed, alongside parking considerations, to help achieve the outcomes?

Strongly Agree

3b What amendments would you like to see included?

comments:

Supporting measures must be provided in perpetuity with a robust, sustainable, and financially viable stewardship model in place from the outset. This can be achieved in principle on Garden Community developments which are comprehensively planned, although this must be realistic. This approach is likely to be less successful on Large Scale Developments which are more likely to have a higher reliance on existing infrastructure or which may have interrelated links to existing communities. The supporting measures may be harder to achieve and establish fairly where conflict with existing communities occurs.

4a In reference to section 4, Do you agree or disagree that the assessment of parking for a Garden Community or large-scale development should be influenced by its existing accessibility?

Neither Agree nor Disagree

4b What amendments would you like to see included, especially if you feel consideration of existing accessibility is not appropriate?

comments:

1,000 units is a reasonable threshold to start employing more progressive parking standards and the accessibility tool provides an appropriate mechanism for assessing the degree to which provision should be reduced.

A Garden Community that is comprehensively planned is different to a Large-Scale Development and has the ambition to establish its own exemplar level of accessibility and sustainability, one a comprehensive package of supporting measures are in place. There should be an aspiration for future accessibility to be the starting point, which will be achieved through the package of measures implemented, with proportionate supporting infrastructure provided at the point of housing delivery.

The Standards allow for review of the most appropriate reduction of standard to apply to Garden Communities, linked to the extent of provision and commitment to delivery of the package of supporting measures required to allow for lower parking standards to achieve the identified desired outcomes.

5a In reference to the accessibility framework, Do you agree or disagree with the metrics approach taken with the Accessibility Framework?

Fairly Agree

5b What amendments would you like to see included?

comments:

It would be preferable to see a layer added to the accessibility level that reflects access to services and facilities outside of urban centres.

6a In regards to section 4.7-4.11, Do you agree or disagree with calculation of a total parking budget for a site rather than calculation of parking per dwelling?

Fairly Agree

6b The calculation of a parking budget aims to balance provision with outcomes; how well do you feel this balance is achieved?

comments:

No comments.

6c Based on your experience, what changes would you make to the numerical standards for Garden Communities and large-scale developments?

comments:

Where there is a comprehensive mobility strategy, there is an ambition for Standards for Garden Communities to be more progressive than Large Scale Developments, particularly with regard to non-residential uses, but this needs to be realistic set against the supporting measures.

7a In reference to section 4.19 - 4.23, Do you agree or disagree with the idea of repurposing areas of parking in the future if demand changes?

Strongly Agree

7b What issues or opportunities can you see with this approach?

comments:

The potential for re-purposing needs to be established at the outset with residents having a clear understanding of future options and benefits which come from it, with a monitor and management plan for review of these spaces at regular intervals. This has the potential to be effective for Large Scale Developments as well as Garden Communities.

8a In reference to section 4, Do you understand the process for applying the Accessibility Tool?

Yes

8b What changes would you make to the process for applying the Accessibility Tool and why?

comments:

It is a complicated process to follow and not clear within the Part 2 Guidance that you need to refer to a separate spreadsheet for the Tool. It would also be helpful to have the non-residential section in the tool rather than just an appendix, as they are currently in two separate places. A web version of the guidance and the calculator would ease and enhance its use.

9a In reference to section 5, Do you agree or disagree with the parking Design Principles here?

Fairly Agree

9b What changes would you suggest, e.g. any further detail or any other principles?

comments:

There should be a greater emphasis on visual mitigation of parking. Where images are used to provide examples, they should show how to do it well and how to do it badly and be clear about which category they fall in to.

10a In reference to table 5-1, Do you agree or disagree with the Design Typology Matrix?

Fairly Agree

10b What changes would you make to the content or order of preference in the Typology Matrix?

comments:

In the context of a comprehensively planned Garden Community a preference for off plot recognises the ambition to be exemplar, working together with the wider Garden Community principles. This needs to be realistic and emphasis on parking being designed with a focus for re-purposing opportunities in the future should also factor in the balance of preferences. Monitoring and management is key as well as the review of the standards referred to above (Q4).

11a In reference to section 5.21 and beyond, Do you agree or disagree with the Design Typologies here?

Fairly Agree

11b What changes would you suggest, e.g. any further detail or other typologies?

comments:

No comments.

12a Do you agree or disagree with the level of detail included on Design Typologies?

Fairly Agree

12b If this detail is not included, where else is it or should it be, e.g. in other documents?

comments:

This section could feature as an appendix, or as a separate design code. As per previous comments, useability is key, and the creation of a web version is likely paramount to ease of use.

13 Do you have any other comments relating to Part 2 Guidance?

comments:

Parking Standards for Use Classes B2 and B8 aren't covered at all for Garden Community and Large Scale Developments in Part 2. Is the expectation that you would apply the Part 1 standards? There should be greater clarity if this is the case.

As per previous comments, it is felt that Large Scale Developments and Garden Communities have the ambition to be substantively different types of developments and different approaches should be taken to parking within each, although it is important that these remain realistic. The part 2 standards appear appropriate for Large Scale Developments, where the context and scale will vary to a degree where accessibility also varies. The approach for Garden Communities should be embedded within a wider mobility strategy and should reflect the review of the delivery of supporting measures which complement lower parking standards and influence the accessibility outputs.

The whole document (Part 1 and Part 2) is comprehensive and in part complex. Many users would benefit from a summary and a web tool. In particular the use of the Accessibility Tool in Part 2 would lend itself to being online based through the website.