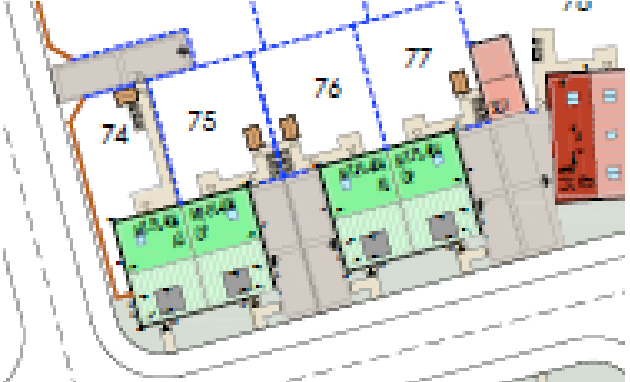


Appendix A

Local Parking Standards SPD Summary of Representations received and Council's Response

Historic England (Reps 1 – 2)		
1	Paragraph 1.2 could be enhanced by ensuring that the design responds to local distinctiveness, the significance of heritage assets and their setting, if relevant for example, within a conservation area.	In response to this we have added a comment in paragraph 2.11 to say that <i>“Within conservation areas materials will be important in the treatment of parking spaces. We would seek to avoid car parking next to listed buildings so that their setting is protected.”</i>
2	It would be beneficial to have a section in the SPD that considers parking considerations when in a Conservation Area or where development will affect the significance of a heritage asset and whether there are specific design considerations that protect and conserve these assets.	Please refer to comment above.
Bolsover North Consortium (Reps 3 – 12)		
3	Paragraph 2.4 refers to a layout produced for Davidsons which comprise parking arrangements from Melbourne Village in South Derbyshire. Melbourne is a high value commuter settlement commanding high property values and properties on this development are bespoke duplicates of that found in the village – they are not representative of developments built by either Davidsons or other developers today. The arrangement shown in the image has no frontage parking, garages are not compliant with the standards promoted in this guidance and the predominance of rear parking courts shown is commonly fought by police, parish and highway authorities due to poor surveillance and resultant on-street parking. We	The image has been replaced by a new series of images showing a mix of parking solutions within developments.

	<p>therefore do not consider this to be a good example used in the SPD.</p>	
<p>4</p>	<p>We support the use of a range/mix of parking solutions throughout proposals.</p> <p>Paragraph 2.7 states that <i>'where double driveway parking is planned between houses, these should only be 2 car lengths and discouraged where 3 car lengths. A boundary fence of verge...'</i> presumably meaning a boundary fence or verge) ...should be shown separating driveways to prevent large areas of tarmac. Landscape strips between parking need to be meaningful and should be at least 2m wide and must be retained.</p> <p>Our interpretation of the parking arrangement described in paragraph 2.7 is as shown on figure 1.</p>  <p>The requirement for a 2m landscaping verge or boundary fence between parking spaces does not constitute good use of land and would result in reduced</p>	<p>We note the respondent disagrees with the guidance outlined in paragraph 2.6 – 2.8.</p> <p>We will remove the requirement for a 2-metre-wide landscape strip, but we will still encourage a 'meaningful landscape strip' and seek its retention but will continue to discourage in general the 3 cars in tandem, where they are parallel to each other due to the visual impacts of extensive tarmac in the street scene. It is proposed to make this revision to the SPD in paragraph 2.9.</p>

	<p>densities. Across a street scene and a whole site, fewer dwellings could be plotted which would have implications on the wider viability of sites.</p> <p>Lower densities would need consideration through local plan preparation; it is likely that additional housing sites would be needed to offset lower densities.</p> <p>We agree with the sentiment that this would break up rows of parking, however, in our view, only soft landscaping and not hard landscaping such as boundary fences (as referred to in the text) would have this positive impact. Furthermore, in our experience, this 2m landscaping verge between parking spaces would be trodden on and would likely be removed by the homeowner in any event.</p> <p>Paragraph 2.6 represents a dislike to integral house types which are among the most popular house types and provide an important means of securing green breaks amongst frontage parked plots.</p> <p>Overall, we disagree with the guidance outlined in paragraphs 2.6, 2.7 and 2.8.</p>	
5	<p>Section B: On street parking</p> <p>On street parking plays a role within street designs where appropriate. Customers do however prefer dedicated off-street parking solutions and the application of this form of parking should therefore be discretionary. We have no further comments.</p>	<p>Comments and customer preferences noted. We also note the respondents opening comment that they agree with a range of parking solutions.</p>

6	<p>Section C On Plot Parking (Drives and garages)</p> <p>Paragraph 4.1 provides an example of staggered 3 storey integral types with stark white garage doors seem to make a deliberate negative image.</p>	<p>We confirm that the image does show a negative example, but this demonstrates the point well. There are very few good examples of integral garages.</p>
7	<p>Paragraph 4.2 in this section needs further explanation, particularly with reference to the following sentence, <i>“we discourage terraces of more than 4 garages or blocks of garages in courts where a house has an integral garage”</i>.</p> <p>We note that blocks of garages are discouraged but the point regarding integral units is not clear.</p> <p>We feel that the statement that <i>“ideally garages should be provided to the side of the property, preferably behind the building line”</i> guides design away from integral units, with no justification. We strongly feel that integral units are important to providing a mix of house types, parking solutions and creating different character area within the site. This wording should be carefully considered so not to discount the importance of integral types.</p>	<p>In response, we consider that most integral garages have a negative impact on the architecture of the building, and this creates an inactive frontage.</p> <p>Only in exceptional circumstances will we encourage integral garages.</p>
8	<p>Paragraph 4.3 states that <i>“a garage itself is not counted as a parking space, however, an under-croft parking space as shown in the image below is counted”</i>. Not only, is this contradictory to the rest of the document (i.e., paragraph 4.4) but it conflicts with the principle of developers providing garages. It is contrary to the adopted Manual for Streets guidance</p>	<p>2.9 It is considered that in line with Manual for Streets, paragraph 8.3.41, that states</p> <p><i>8.3.41 In determining what counts as parking and what does not, it is recommended that the following is taken into account:</i></p>

	<p>which Derbyshire County Council Highways direct developers when preparing development proposals intended to be adopted.</p> <p>The table of internal garage dimensions are generally onerous on developers and have impact(ed) on land-take., discouraging the provision of garages. The dimensions in the 'absolute minimum' column are welcomed and considered standard, good-sized garages across most other authorities. The need for storage space as referenced in the table is unjustified.</p>	<ul style="list-style-type: none"> • <i>car ports are unlikely to be used for storage and should therefore count towards parking provision; and</i> • <i>whether garages count fully will need to be decided on a scheme-by-scheme basis. This will depend on factors such as:</i> <ul style="list-style-type: none"> – <i>the availability of other spaces, including on-street parking</i> – <i>where this is limited, residents are more likely to park in their garages;</i> – <i>the availability of separate cycle parking and general storage capacity</i> – <i>garages are often used for storing bicycles and other household items; and</i> – <i>the size of the garage</i> – <i>larger garages can be used for both storage and car parking, and many authorities now recommend a minimum size of 6 m by 3 m.</i> <p>Therefore, we will count garages as a parking space as long as they are of a minimum dimension and are assessed on a case-by-case basis, in order that a different approach could be arrived at based upon local circumstances, and on this basis it is proposed that the paragraph 4.4 of the SPD will be revised.</p>
9	Paragraph 4.6 regarding ridge alignments of the room is considered a design matter and not a parking matter.	It is considered that this is a knock-on effect of parking arrangements, and it makes sense to reference it in this document.
10	Similarly, paragraph 4.7 relating to drainage of parking spaces should in our view, be a matter to be agreed with the LLFA and drainage consultant. The use of	It is considered that this is a clear car parking design issue. Materials will be agreed at the time, but we are

	<p>permeable surfaces is reliant upon ground makeup, topography, viability and not a matter for an SPD to involve itself in.</p>	<p>discouraging the use of gravel as often it is inappropriately applied.</p>
11	<p>The Council discourage triple tandem parking (see paragraph 4.8). Similarly, to the landscape verge between parking spaces, this creates an issue for densities and site wide viability. Triple tandem parking provides a space efficient solution for larger 4 bed properties. The proposed ruling design to prevent triple tandem parking will result in a plot being lost for every 4 types plotted. The SPD doesn't appear to appreciate the wide-ranging implications compliance with proposed policies will have.</p> <p>The introduction of the SPD also stands to undermine extant outline planning permission sites where design code must comply with approved Design and Access Statements.</p>	<p>The Bolsover North Design & Access Statement is still relevant, and we would expect adherence to that.</p>
12	<p>Section D Parking Courts</p> <p>It is positive that the SPD does not rule-out the use of parking courts. However, paragraph 5.4 provides a list of prescriptions about the parking court including a number of cars.</p> <p>We do not agree that a minimum of 12 cars in a parking court should be encouraged. This is larger than some car parks for convenience stores and would give way to large hard landscaped areas. Instead, parking courts should provide for a certain number of</p>	<p>In response, we consider that rear parking courts should not be visible, and we don't want them to look like car parks. We would prefer a courtyard appearance rather than a car park appearance, with landscaping and other combined holistic design requirements. A combination of factors makes this work.</p> <p>We will take on a case-by-case basis but depends on overall design of scheme where a mix of parking patterns are encouraged.</p>

	cars but be viewed on a case-by-case basis. The introduction of a ‘large focal tree’ in the parking court will likely cause manoeuvring issues but we welcome the introduction of some landscaping to soften the area.	
	National Highways (Rep 13)	
13	National Highways has considered the contents of the SPD and has no comments on this consultation.	Response noted.
	The Coal Authority (Rep 14)	
14	I can confirm that the Planning team at the Coal Authority has no specific comments to make on this document.	Response noted.
	Stephen Hawley Derbyshire County Council (Reps 15 – 28)	
15	Reference is made to DSP (2017), DCC has consulted with BDC on a revised design guide and met with officers, the SPD should add an appropriate caveat or indicate “or superseding document”	Our updated parking standards SPD reflects our Local Development Scheme. The intention is that the SPD would supersede the documents referred to in paragraph 1.4. Any newer relevant publications will be taken on their merits at the time.
16	Section B: On Street Parking Whilst on street parking is accepted, it is in the context of visitor provision where there is short term attendance. There should be a clear distinction made that parking which is directly associated with a residential dwelling is not counted on street. Where laybys are used the same principle applied, the highway cannot be reserved for individual users and private islands within the highway cannot be accepted due to the ability to ensure that street users are fully protected when using the highway surrounding them,	In response to this we have decided to add some text to paragraph 3.4 that says “ <i>Where we consider that the parking design response requires dedicated on-street parking, early consultation with the Highways Authority is recommended to ensure acceptability. It is recommended that the developer discusses with the Highways Authority the spatial arrangement with regards to adoption or maintaining the highway as a private road.</i> ”

	they also have practical issues of maintenance and drainage. The document should indicate that the on-street option is only for visitor arrangements.	
17	<p>Section C: On Plot Parking</p> <p>4.4 DCC will not recognise garages as parking spaces for vehicles. Manual for Streets provides clarification on the reasoning in paragraph 8.3.40, and as such the reliance on a garage for long term parking is not likely.</p>	In response, on reflection we have decided due to the efficient use of land that we are going to include a garage as a space. Manual for Streets 8.3.41 provides flexibility as to whether it is included or not. Whether garages count fully would need to be decided on a scheme-by-scheme basis.
18	<p>Garage Internal Dimension.</p> <p>Whilst DCC will not accept garages for car parking, it notes that there are a significant number of dimensions provided and it is unclear how they have been derived. MfS 8.3.41 recommends a minimum size of 6m x 3m. It is questionable if the other dimensions listed in the draft SPD could be justified under challenge.</p>	We have added references for these garage dimensions after the table.
19	<p>Garage set-back distances.</p> <p>DCC has proposed a 6m setback based on a 4.8m parking space and then 1.2m to allow for garage door opening. The SPD dimensions are larger, and it is unclear how these have been derived, again they may not be justifiable under challenge.</p>	The garage set back distances are those set out in Delivering Streets and Places (2017).
20	<p>4.7. It is typical for loose material to be acceptable where there is a 5m hardstanding from the edge of highway to ensure that vehicles have good traction and don't drag gravel onto the highway. Where such an arrangement is proposed the wider use of loose material would be acceptable.</p>	In response we have added some wording to paragraph 4.10 <i>“Consideration will be given to gravel drives where there is an appropriate apron or set back from the back of the footway, and there is an appropriate gradient to the driveway itself to prevent gravel slippage.”</i>

21	4.9. The dimensions conflict with nationally accepted parking space dimensions. If BDC seeks to provide a large parking space there should be evidence cross referenced to justify the large size, otherwise it is not robust and results in inefficient use of land and excessive material use with an increased carbon footprint for the proposal. BDC need to justify the non-alignment with national endorsed dimensions.	The dimensions of a parking space are included in the Bolsover District Local Plan Appendix and have been accepted by an inspector through the examination process. We can't alter this until we review the Local Plan. The government website still refers to the Essex County Council Parking Standards (2009) which shows an even larger parking space.
22	DCC would encourage a reference to be made lifetime homes standards.	In response we have added an additional paragraph 4.13 to say, <i>"In respect of residential properties that are to meet Lifetime Home standards we will require circulation around parking spaces to meet part M of the building regulations."</i>
23	5.4 Clarification is needed why the courtyard is restricted to 12 parking spaces. DCC a more logical proposal would be to use the number of dwellings as the metric.	In response, we consider that rear parking courts should not be visible and we don't want them to look like car parks. We would prefer a courtyard appearance rather than a car park appearance, with landscaping and other combined holistic design requirements. A combination of factors makes this work. We will consider proposals on a case-by-case basis but will depend upon overall design of scheme where a mix of parking patterns are encouraged.
24	Section F: Accessible Parking 7.2 Exclude DSP (2017 reference) as it is due to be replaced.	Until a new version is published, we will continue to refer to the previous version.
25	Appendix 1 BDC Parking Standards Clarification is needed as how these ratios have been derived given the absence of national guidance. Without clear justification these ratios would not stand up to challenge.	These standards are part of an adopted local plan and was to the satisfaction of the Local Plan Inspector during an examination process.

	DCC recommends that parking for non-residential uses are justified by the application using parking accumulation from suitable donor sites or the use of the TRICs database.	The standards themselves cannot be changed until the Local Plan is changed.
26	The revised SPD should place greater emphasis on carbon reduction for individual developments and the implications for the wider district. I would direct you to Reform of parking policy needed to encourage lower carbon travel (tps.org.uk) which provides some helpful concepts which should be taken forward in revised parking policy.	The SPD relates to parking design and issues in relation to parking reduction strategies will be dealt with through other policy initiatives and at the time of a review of the local plan when car parking standards can be re-examined.
27	The SPD does not make reference to the use of mobility hubs or car clubs, these are important tools that need to be integrated into development, particularly larger schemes where there is a critical mass to make them self-sustaining.	The SPD relates to parking design, and such matters will be dealt with through other policy initiatives and at the time of a review of the local plan when car parking standards can be re-examined.
28	The SPD should also make provision for parking restraint in urban settings rather than defining parking as a minimum level as a way to manage trip demand as well as providing wider environmental benefits.	The SPD relates to parking design, and such matters will be dealt with through other policy initiatives and at the time of a review of the local plan when car parking standards can be re-examined.