

**PARKING:
SUPPLEMENTARY PLANNING DOCUMENT**

**SUMMARY AND ANALYSIS OF
CONSULTATION RESPONSES**

TABLE OF RESPONSES

Ref No.	Respondents	Summary of Key Points	GBC Comment / Action
(paragraph references refer to numbers assigned in Consultation Draft)			
General Comments			
1/1	1 resident	Communal parking areas provided for those visiting Gosport and the surrounding areas should not be seen as a resource for new residents to use for their own personal parking needs. I strongly agree with this approach.	Support noted.
1/2	1 resident	The cost for using car parks should be kept to an absolute minimum and street parking should always be free (no cost) in order to ensure that the town centres do not die and shops are maintained.	The Parking SPD is a development control document, and does not set strategy for the future provision / maintenance of public parking places on, or off-street. Accordingly it is not appropriate for the parking SPD to include policy measures on charging.
2/1	1 resident	Noted concerns relating to parking on a particular junction at Chantry Road.	This is not relevant to the SPD. Enquiry forwarded to HCC Traffic Management.
2/2	1 resident	Noted concerns about the Wheatsheaf Redevelopment for housing / numbers of car parking spaces provided / overspill.	This is not directly relevant to the SPD. Enquiry forwarded to GBC Development Control.
3	Marine Management Organisation	No comments raised.	
4/1	Highways Agency	As the executive agency responsible for operating, maintaining and improving England's strategic road network (SRN), the HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. The nearest SRN is the M27 but being some distance away we would only be concerned with the largest developments in Gosport.	It is not anticipated that the parking standards will have a significant influence upon the traffic impact upon the SRN arising from development in Gosport.

9	Natural England	Natural England have no comments in respect of the SPD but concur with the conclusions of the Habitats Regulation Assessment.	Support noted.
10	English Heritage	No comments made.	
14	Environment Agency	No comments made.	
16	The Gosport Society	Pleased to see previous standards abandoned and a more practical approach to parking reinstated. Overall very impressed with this SPD and hope it will be achievable in future developments.	Support Noted.
18/1	Lee Residents	We are glad to see that the fallacies of the “maximum” approach have been recognised.	Noted.
18/4	Lee Residents	Street parking of large vehicles can be severely detrimental to the amenities of local residents. If feasible, any street parking should be restricted to private cars.	Goods vehicles are an essential part of daily life and it is necessary to allow the temporary parking of refuse freighters, furniture delivery lorries, parcel delivery vehicles etc. in residential streets. Effective blanket restrictions on the parking of all large vehicles in residential areas for other purposes could be difficult to apply and enforce and would need to be promoted by the Highway Authority.
Section 1: Introduction			
13/1	Robert Tutton Town Planning Consultants	<u>Page 1 & 4 Paras.1.3 and 1.11 – Status of the Document</u> The dictionary definition of ‘supplement’ is ‘a part added to a book etc. to provide further information’. The ‘SPD’ cannot be a supplement to the emerging Gosport Borough Local Plan 2011-2029 when that document will not have even reached pre-submission stage until September 2013 and Policy R/T11 may change prior to adoption.	Noted. Page 1, paragraph 1.3, of the SPD will be amended to clarify how the SPD will support the policies of the current and proposed local plans. Once the emerging Gosport Borough Local Plan (2011-2029) is adopted the SPD will be linked to Policy LP23 (Layout of Sites and Parking policy) or its equivalent policy.

4/2	Highways Agency	<p><u>Page 4 Para.1.10 -Transport Assessments</u> We are keen to see the impacts of traffic from development mitigated and note reference to transport assessments and traffic planning requirements. This may need to consider the impacts on the M27 junction 11 for larger scale developments.</p>	<p>The need for and scope of Transport Assessments will be determined on a site-by-site basis by the Highway Authority (Hampshire County Council). The Assessments will take into account the scale of proposed developments and their likely impacts and identify mitigation measures where necessary.</p>
Section 2: Parking Problems, Policy Objectives & Standards			
6/1	1 resident	<p><u>Page 5 Para 2.1 – Local Parking Problems</u> Given that the average number of cars per family unit is increasing, the total amount of development, new plus existing, should decrease, if parking problems are to be avoided. This logical option is not addressed in the document.</p> <p>Nor is the option of 1 maximum car parking space per family unit discussed. This could be a discretionary power given to local authorities, in addition to the present traffic regulation powers. Preamble arguments for this are contained in the document itself ‘Factors affecting car ownership’ pages 8/9.</p>	<p>This comment implies that new development cannot provide adequate parking to meet its present and future needs and should not be permitted. This argument is not accepted.</p> <p>Experience of maximum standards under past government policies indicates that the setting of maximum parking standards below need is not very effective in reducing car ownership and would not achieve the objectives of this SPD. The Council wishes to promote parking standards in new development that meet the reasonable needs of occupiers and users and to avoid undue interference with the safety and function of the highway and the use and enjoyment of existing development.</p>
13/2	Robert Tutton Town Planning Consultants	<p><u>Page 5 Paras 2.1 & 2.3 - Local Parking Problems</u> No evidence whatsoever has been presented to show that difficulties have been encountered where maximum parking standards have been utilised in recent years. The photographs that are presented show that <i>‘Many existing streets are full to capacity, which results in inappropriate parking’</i> show terraced properties that were erected before the introduction of planning controls, when on-site parking facilities were a rarity. Under-enforcement of Traffic Regulation Orders is a frequent cause of highway danger and</p>	<p>The SPD is intended to be a reasonably concise guide to parking provision and it is not considered appropriate to include detailed evidence. This statement is based on observations and experience over many years and reflects the generality of complaints of the public and members and objections raised to planning proposals. Planning applications have come forward under the regime of maximum standards with unrealistically low levels of parking which the Council could not refuse. For example the Royal Clarence Yard development of mostly 2 - 3 bed units is planned to provide no more than one space per unit. The</p>

		inconvenience.	<p>residents association has provided evidence this falls well short of the desired provision and current car ownership.</p> <p>The government has moved away from a policy that sought to under-provide parking to deter ownership. In 2011 the government removed national planning restrictions that required councils to limit the number of parking spaces and local policy is to seek to meet reasonable needs in line with the NPPF.</p> <p>Highway danger and inconvenience is also caused by inadequate parking. In well-designed sites with an appropriate number and distribution of parking spaces there will be little need for the enforcement of TRO's.</p>
12/1	Beaulieu Properties	<p><u>Page 5, Paras 2.3a & 2.5 Requirement for Development to Meet it's Own Parking Need / Role of Highway in Accommodating Parking</u></p> <p>It is proposed that all <i>new development meets its own needs</i> (Para 2.3 a) and [applicants] <i>aim to meet parking needs within their development site</i> (Para 2.5). This is laudable, but it also needs to be considered in the context of existing parking provision at and around the site of the new development. Dual use or sharing of public parking facilities could be a sensible manner in which to deal with parking in town centres or where there is currently an overcapacity of parking locally. Whilst all cases are not identical, there should be a phrase included to allow specific circumstances to be able to be demonstrated to allow use of other facilities in particular cases, as noted in Para 2.14. This paragraph may need to be re-emphasised elsewhere in the document or repeated at the start as an all-encompassing statement/principle. Beaulieu Properties note concern over the ambiguous nature of the last sentence of Para 2.5 which states that applicants should 'largely' aim to meet parking needs within their development site. This gives no indication of the quantifiable</p>	<p>Para. 2.5 states that <i>applicants should largely aim to meet parking needs within their development site</i>, thus it is implicit that on-street parking is permitted to meet a small proportion of parking needs. Para 3.4 indicates where new developments are served by existing streets parking needs should <u>generally</u> be met by the provision of off-street parking, thus on street parking is not encouraged. Para 3.5 offers support for a small proportion of on street parking in developments with new access roads designed for the purpose. Some flexibility is needed and it is not considered appropriate to give a quantifiable measure of 'small', and the acceptable proportion will vary according to the circumstances of the application. Overall the SPD encourages the provision of off-street parking but provides sufficient scope for sharing of public parking space within the highway where there is spare capacity, the roads are fit for the purpose, and parking can be provided in accordance with the objectives set out in para 2.6. Further, developers are invited to provide supporting information to justify their parking proposals and variations on the standards.</p> <p>For consistency amendments are proposed to page 9, paragraph 2.10 and page 28 Appendix A to clarify that the tables in</p>

		<p>measure that would be acceptable to the LA. Clarification in this regard would be appreciated.</p>	<p>Appendix A indicate the minimum number of spaces required to meet the needs of various forms and classes of residential and non-residential development. It will also be clarified in Appendix A that the parking standards in the tables will not satisfy all circumstances and developers should consider if they are fully appropriate to individual applications and would satisfy the core objectives of this SPD. Increases or reductions will be considered where justified by supporting information with regard to relevant factors such as the nature and location of the development, the allocation of parking spaces (or not), visitor parking requirements, the function of the street and existing parking demands and capacity. Where practicable surveys will be required of existing parking demands at similar forms of development in comparable localities to assist in determining parking needs.</p>
18/2	Lee Residents	<p><u>Variation in Standards</u> In our view there are too many “escape clauses” and, without being unduly prescriptive, the document should make it clear that only in very exceptional circumstances will the standards in Appendix A be relaxed. For example, para 1 of Appendix A we could substitute “aim to meet” by “will be required to meet”</p>	<p>The Council recognises that the needs of development vary according to the circumstances of individual applications and therefore will consider variations in the standards where justified.</p> <p>Amendments are proposed to Appendix A, as detailed in 12/1 above, which clarify the scope for variations in the standards. Paragraph 1 is to be changed to :- <i>The following tables indicate the minimum number of parking places <u>required to meet</u> the needs of various classes of development.</i></p>
13/3	Robert Tutton Planning Consultants	<p><u>Page 8 Para.2.6 – The Core Objectives</u> With its focus on ‘all new development’, there is a notable lack of initiatives in the draft document to address existing difficulties. it should surely be a core objective in Gosport Borough that on-site parking provision should be geared to the proximity to bus routes and the frequency of services.</p>	<p>It is a core objective to protect the interests of existing residents and businesses through the provision of adequate parking in new development. The draft Gosport Borough Local Plan and the sub regional transport plans seek to address existing transport difficulties by improving public transport, cycling and walking to increase travel choice and reduce reliance on the car.</p> <p>It is not accepted that reducing parking where bus services are available should be a core objective. There is a lack of research</p>

			<p>evidence that car ownership is strongly related to access to public transport*. Reductions in parking standards will only be accepted where the influence of buses on car ownership can be quantified in a Design and Access Statement or Transport Assessment or other supporting information. The Council will not accept arbitrary levels of reduction based just on the proximity to bus routes and frequency of service, as formerly used in the Hampshire Parking Strategy and Standards.</p> <p>People may be able to catch a bus close to home at reasonable frequencies, but buses may not go where and when they want. Many factors aside from accessibility to buses will influence car ownership. Demographics, health and socio economic circumstances, together with the proximity to essential services, affect the desire and the ability to own and drive a car and the need to travel. Bus use as a potential substitute for the car will be influenced by the reliability, quality, cost and convenience of services; the image, the perceptions of security and importantly the availability and frequency to a desired range of localities providing services, jobs, shops, education, leisure etc. The factors affecting bus use and car ownership are thus many and varied and it is inappropriate to gear parking provision to simplistic measures of proximity and frequency of bus services. (*ref Dudley MBC Residential Parking Research and Draft Standards January 2011)</p>
13/4	Robert Tutton Planning Consultants	<p><u>Page 8 Para.2.7 – Factors Affecting Car Ownership</u> A large detached house close to frequent bus services may have a lesser need for on-site parking than a smaller house that is remote from public transport.</p>	<p>Large detached houses are also likely to be favoured by relatively large and / or affluent families whose car ownership may not be influenced by the availability of buses</p>
13/5	Robert Tutton Planning Consultants	<p><u>Page 8 Para.2.8 and Page 11, Para.3.2 – Tenure and Variable Car Ownership</u> Just how are ‘..the potential for tenure to change over the life of a dwelling’ and ‘variable car ownership through the life of each dwelling’ to be actually accounted for?</p>	<p><u>Tenure / Affordable Housing</u> Affordable homes such as social rented and shared equity housing generally, but not always, have a lower car parking demand than similar owner-occupied market homes. However affordable homes generally have the potential to become market homes and the General Residential parking standards should normally be applied. Possible exceptions are if the applicant can</p>

			<p>demonstrate the tenure cannot or is unlikely to be changed; or provisions can be made to increase parking capacity, if so required by a change of tenure. There may also be circumstances where the absence of suitable on-street parking opportunities will constrain car ownership at the affordable homes level, regardless of future tenure.</p> <p>Page 8 paragraph 2.8 will be changed to clarify this position. (See also 17/3 below)</p> <p><u>Variable Ownership</u></p> <p>The Council will expect the total parking provision to meet the overall needs of the street through the life of the development. Where allocated parking is used the standards allow for most of the parking demand to be met on plot, but there will be times when some households have multiple vehicles and overspill parking needs to be accommodated. Consider a development of 3-bed dwellings. The required 2 spaces will meet the needs of most homes most of the time. But the 2011 census data indicates that on average around 5% of dwellings in Gosport have 3 or 4 cars and therefore additional parking places are required for these, which can be on street if there is spare capacity.</p> <p>As explained in paragraph 3.8 unallocated shared parking places have more flexibility to cope with variable car ownership. A lower parking provision is therefore required in the standards and there will generally no need to make extra provision for variable ownership.</p> <p>To assist in the determination of parking requirements to meet variable demands it is proposed to include a table of census data on average car ownership which indicates the proportion of households by Gosport ward with zero, one, two, three and four or more cars. Notes will be added to clarify that this data represents average ownership across all types of dwelling and is not a direct measure of the parking requirements, these will need to be determined for the particular type of dwelling with regard to peak, not average demands.</p>
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13/6	Robert Tutton Planning Consultants	<p><u>Para.2.11 – Number of Bedrooms as Indicator of Parking Need</u> The number of bedrooms may be a ‘coarse measure’ but other measures (e.g. the number of habitable rooms) throw up their own difficulties.</p>	Agreed
12/2	Beaulieu Properties	<p><u>Page 10, Para 2.16 – Need for Surveys of Comparable Development to Support Parking Proposals</u> It should be recognised that there are not many locations that are comparable to Gosport with its peninsular location but with access across water to other modes of transport. As such, whilst the provision of comparables is suggested in Paragraph 2.16, this needs to be recognised as being difficult to do in reality and so in many cases a case by case approach will need to be taken and comparable evidence may not be possible to be provided. Portsmouth City Council will already hold data on the patterns of movement and use of strategic connections in the sub-region as their policy requires post-development surveys to measure the predicted numbers provided pre-planning. It is suggested that Gosport Borough Council could obtain and make this data available based on an agreed analysis strategy. Given the scale of surveys that would otherwise be required for any larger mixed development, the suggestion in the SPD that the developer should undertake this work, with its associated high cost and no guarantee of planning success, would prove a significant barrier to investing in Gosport.</p>	<p>It is accepted that directly comparable sites may not always be available, when assessments on a case by case basis will be necessary.</p> <p>It is not clear how data held by Portsmouth City Council on patterns of movement will assist in determining parking need in Gosport.</p> <p>It is important that the parking provisions are properly assessed in the interests of the users of development and the wider public. However concerns over costs of surveys are noted and the SPD will be amended to indicate they will only be required where practicable and relevant.</p> <p>It is proposed to amend page 10, paragraph 2.16 to indicate that where practicable developers should survey existing parking demands at similar forms of development in comparable localities to assist in determining an adequate parking provision.</p>
8/1	1 resident	<p><u>Cycle Hire Schemes</u> The challenge for parking space for private cycle parking and use of public transport can be alleviated by the provision of a local Cycle Hire Scheme, as adopted in many European Cities / Towns e.g. London, Paris, Amsterdam, Santander, La Rochelle.</p>	It is accepted that there is merit in cycle hire schemes at some locations, such as the ferry bus and rail interchange. However it is not considered appropriate to address these measures in the Parking SPD.

		<p>Within Gosport Borough Council area Cycle Hire docking stations conveniently located may encourage local residents, businesses and visitors to take a hire bike rather than use a car. In future any new or improvement developments of educational, business, commercial and retail properties / locations could be required to make provision for Cycle Hire docking stations e.g. Daedalus Solent Enterprise Zone. Other suitable locations would be Lee – West Point, Lee-Marine Parade West and East, Gosport Ferry – Falkland Gardens, Haslar old Hospital Site, Gosport Leisure Centre, Hardway, Stokes Bay, Tesco's Rowner, Rowner Road, Gosport Hospital, Creek Road, Stoke Road, etc.</p> <p><u>Car Clubs / Share Schemes</u> In many European Cities and Towns the development of Car Club / Share Schemes has alleviated the need for personal ownership of private cars and thereby supported local area plans and addressed the parking challenges. Gosport Borough Council would benefit from considering supporting car sharing / clubs and consider whether providing on-street spaces to a car club / sharing schemes e.g. Zipcar, Blablacar, schemes would support the SPD. Likewise the introduction of electric / hybrid cars within these schemes also supports the Council's environmental policies and establishment of charging point locations. Reference to other local authorities who have benefited from the introduction of these schemes e.g. Westminster Council, Maidstone, Cambridge, would also show that the Council can save money by utilising these schemes by reducing its pool car / fleet (vans are included), thus demonstrating to the citizens that the Council "walks the talk".</p>	<p>It is also accepted that there is merit in car clubs.</p> <p>A new paragraph 2.19 will be added at page 10 to indicate that developers should consider the promotion of car clubs and bicycle hire schemes as a means of reducing the need for people to have their own vehicles. Consideration will also need to be given to the parking requirements of hire or pool vehicles in accessible locations, including the storage of cycles and the charging needs of electric cars and cycles.</p>
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8/2	1 resident	<p><u>Lee-on-the-Solent – Daedalus Park and Ride (Summer Only)</u></p> <p>The challenge to accommodate day visitors private cars that visit the area during the summer could be alleviated by the introduction of a Park & Ride facility based at Daedalus (potentially adjoining the new college / enterprise site). This type of facility is utilised in areas of Europe e.g. La-Rochelle, Chatelaillon-Plage, Charente Maritime, to support the local sea front parking challenges by running a shuttle bus from an out-of-town parking location to the sea front e.g. Ship Inn, West Point and Drake Road. A small charge for the service would ensure the scheme is self-funding. The boost to the local economy supporting the retail and commercial operators would also ensure that opportunities are not lost due to visitors moving on elsewhere because they are unable to park. Indeed this scheme would also avoid the need to create larger car parks on the sea front spoiling the special conservation area along Lee-on the-Solent seafront. I therefore propose that the Parking SPD considers a Park & Ride Scheme for Lee-on-the-Solent for the summer months (April-September).</p>	The proposals are noted.
Section 3: Parking Issues and Considerations			
6/2	1 resident	<p><u>Page 11 Para 3.2 – Parking Issues & Considerations</u></p> <p>The possible maximum of 4 vehicles per living unit raises the possibility of car parking areas being larger than the units they service. This negates many of the layouts shown in the Design SPD and omits any reference to facilities for parking by furniture lorries etc. The concept of spare capacity identified in Para 3.5 therefore requires further elucidation and detail.</p>	<p>This is not a correct interpretation of paragraph 3.2 - the SPD sets no maximum standards. Paragraphs 1.9 and Appendix A require developers to consider their proposals against the core objectives which should include a consideration of how the parking requirements are to be met through good design. Paragraph 4.3 addresses the need for layouts to meet the operational require of the proposed developments and the need to accommodate lorries. Spare capacity as described in paragraph 3.5 adequately accounts for servicing requirements i.e. the accommodation of lorries.</p>

		The possible maximum of 4 cars is already exceeded at some houses in Alverstoke. Para 3.2 therefore requires further consideration.	There is no maximum standard. The SPD requires the overall parking provision to be flexible to meet variable demands.
18/3	Lee Residents	<p><u>Off-Street or On-Street Parking</u> Page 8, para. 2.5 – delete “largely” in penultimate lines</p> <p>Para 2.6, first bullet point, insert “on site” before “parking provision”</p> <p>Page 11, para. 3.6. The last sentence should read, “Parking proposals must therefore meet the maximum foreseeable demand without recourse to on-street parking”</p> <p>Page 30 Table 1a, note 3. References to on street parking should be deleted.</p> <p>Page 30 Table 1a. Three and 4 bedroom houses. This means, presumably, that an applicant for an extension providing a fourth bedroom will have to find an extra parking space?</p> <p>Page 12, para 3.7. We do not agree that reliance should be made on “on street parking”. Cherque Farm is an example of this especially in the evenings.</p>	<p>The Council maintains parking needs should be largely met on-site, but accepts that to achieve efficient and flexible car parking it is appropriate in the circumstances as set out in paragraphs 3.4, 3.5 and 3.11 to allow a small amount of parking on-street. An amendment is proposed to paragraph 2.5 to cross reference the guidance on the use of on and off-street parking contained in these paragraphs.</p> <p>Yes</p> <p>Paragraph 3.7 does not encourage developers to rely on on-street parking. It states “a small degree of parking overspill onto the street may be acceptable where there is spare capacity”.</p>
5/1	1 resident	<p><u>Page 14 - Accessibility To Public Transport</u> There appears to be no recognition of the difficulties experienced by residents in certain areas of the Borough, resulting from the recent changes in First bus services. Certain routes now bypass areas such as Stoke Road, where predecessors went down that road. Less frequent bus services mean it is more likely that residents will use their cars, which is in conflict with the Government policy to encourage the use of public transport. Residents in new</p>	When setting parking standards we will have regard to the availability of buses on car ownership only where developers provide evidence that bus services reduce parking demand.

		developments will obviously experience the same difficulties, unless changes are implemented.	
12/3	Beaulieu Properties	<p><u>Page 14 Para 3.14</u> <u>Visitor Parking Provision and Public Transport</u> I would like to understand more fully how “the likelihood of visitors using public transport” is to be measured and controlled as this is up to the operators of public transport. If the current situation shows people do not use public transport that should not be prolonged through further visitor parking. This would normally be covered in a Travel Plan with targets to aim to try to get people to use public transport at a greater rate than currently.</p>	<p>A prediction of public transport use could be made by reference to current public transport patronage. For example if on an average weekday evening buses have a mode share of say 3% and the ferry 5% of town centre trips it might be assumed they also carry 8% of visitors. A proportional reduction in the visitor car parking requirement of 0.2 spaces per unit might therefore be justified for developments in reasonable proximity to the ferry. However this level of public transport would only permit a reduction of one visitor parking space in a development of 60 units and reductions will therefore likely be limited to major developments. (60 units require 12 visitor spaces, 8% usage of public transport allows a reduction to 11 spaces).</p>
6/3	1 resident	<p><u>Page 14 Para 3.16</u> <u>Accessibility to Public Transport</u> The recent major changes to bus route could overturn the assumptions here.</p>	<p>The recent changes in commercial bus services indicate that the permanence, particularly of services with low patronage, cannot be relied upon. However paragraph 3.16 notes the need to provide parking where public transport is available. Paragraph 3.17 requires that any proposed reductions in car parking provision on the grounds of good accessibility to public transport must be justified. The security of future services would be a factor to be taken into consideration.</p>
13/7	Robert Tutton Planning Consultants	<p><u>Page 14 Para.3.16 – Accessibility to Public Transport</u> The pessimism of this approach is discomfoting, as it implies that, no matter how good the bus service in Gosport may become, households are unlikely to shift their mode of travel.</p>	<p>The Borough Council believes that a comprehensive affordable quality bus service will enable a modal shift away from car use, as demonstrated by the BRT. However it does not follow that improvements in travel choice will necessarily result in reduced car ownership and a reduced need for parking. In previous parking standards there has been misplaced optimism regarding the impact of access to buses upon car ownership which resulted in excessive and arbitrary reductions in maximum parking standards. As far as we are aware there is no evidence that this approach resulted in a significant modal shift from car to bus, or a reduction in car ownership. The SPD therefore requires future</p>

			reductions in parking provisions on the basis of accessibility to public transport to be justified by sound local evidence.
13/8	Robert Tutton Planning Consultants	<p><u>Para. 3.17 – Accessibility to Public Transport</u> In order to be proactive and positive, the highway/planning authorities should set down criteria for making the judgement as to where and when residential car parking standards would be reduced.</p>	The SPD does provide guidance on where and when car parking standards might be reduced. Appendix A paragraph 2 indicates the LPA will consider variations in the standards where justified by information supporting the application. The SPD indicates that reductions may be appropriate where travel plans are used (2.17), in the Town Centre (3.14 & 3.19) and where bus service can be shown to reduce car ownership (3.17).
12/4	Beaulieu Properties	<p><u>Page 14 Para 3.17 – Reductions in Car Parking through Travel Plans</u> The use of Travels Plans is common in allowing reductions in parking provision where the site is accessible to public transport as opposed to requiring developers to provide evidence upfront that people will use public transport. This can then be controlled and managed in the Travel Plan for the scheme.</p>	It is accepted that travel plans can encourage the use of public transport and active modes. However the Borough Council will not reduce the parking requirement to account for accessibility to buses in the arbitrary manner prescribed under the former Hampshire Standards and will require evidence that the Travel Plan projections for car ownership are achievable.
13/9	Robert Tutton Planning Consultants	<p><u>Page 15 Paras.3.18-3.19</u> <u>Reduced Parking Standards in Gosport Town Centre</u> The principle of reduced parking standards should apply to other centres, too, especially those that are served by the Eclipse bus service.</p>	Developers are able to make a case for reductions at any location. However the town centre uniquely benefits from good access to a range of services and shops, the ferry and the full range of bus services. No other area has comparable accessibility.
6/4	1 resident	<p><u>Page 15 Para 3.19 & 3.21 – Parking for Businesses and Services in Gosport Town Centre</u> The presumption of low car ownership in Gosport Town Centre ignores the evidence for widespread commuter parking not directly linked to residents of Gosport Town Centre. This also skews the calculation of car parking requirements for new developments in Gosport Town Centre.</p>	The census data shows that average levels of car ownership in Gosport town centre are lower than elsewhere. The Council is aware that commuter, shopper and other visitor parking may preclude or restrict on street parking opportunities for residents – as will any on street parking controls. Paragraph 3.4 indicates that parking needs should generally be met off-street where developments are served by existing streets.

12/5	Beaulieu Properties	<p><u>Page 15 Para 3.20 – Use of Public Car Parks</u> This suggests that dual-use parking for additional cars beyond the first car and sustainable measures to restrict parking and car use would not be supported by Gosport Borough Council. Public car parks can provide a key tool in providing for this discretionary element of parking that can alter and fluctuate, y using this approach and limiting parking on site, this could help to reduce car use and respond over time to the potential that car use decreases over time. Provision of public car parks near to developments should be taken into account in the context of considering parking provision if the developer is happy to have this. It can lead to a higher quality, less car dominated development.</p>	<p>The Borough Council wish to provide travel choice through the promotion of sustainable modes, but is not seeking to restrain car ownership by restricting parking or car use. This is not Government or local policy.</p> <p>The Borough Council does not support the shared use of town centre public car parks to meet the residential parking needs of new development. This presents many practical challenges and potentially restricts the ability of the Council to manage its assets in the best interests of highway users, town centre businesses and services.</p>
12/6	Beaulieu Properties	<p><u>Page 15 Para 3.21 Parking for Businesses and Services in Gosport Town Centre</u> Whilst it is accepted that public and on-street parking may not be there in perpetuity, such parking provides for the dual and flexible provision of parking in areas such as Gosport Town Centre. It is common place that a small shop for example would not have to provide a dedicated parking space for the employees, but may want to utilise any surplus land near the highway for a drop-off point for the customer or servicing. These seem more appropriate, but if town centre car parks for employees or on-street parking are not permitted to be used, then this will lead to a car-dominated environment that may not be able to permit many forms of new development in town centres.</p>	<p>Residential development which is dependent upon public car parks will generally not be acceptable. Exceptions might be very small residential developments likely to attract non-car owners such as a flat over a town centre shop.</p> <p>Shared use of parking will be acceptable in some cases – for example a parking area which could serve daytime retail and evening leisure. Where residential parking is shared with businesses and services there must be capacity to meet the peak total demand.</p> <p>It is accepted that the parking requirements of the staff of businesses and services may be met in town centre public car parks and on street parking places, where controls permit. Provided there is capacity in existing car parks no additional parking provision will generally be required.</p>
7/2	Hampshire County Council	<p><u>Page 16 – Traffic Regulation Orders & Planning Agreements</u> HCC request the following text be included in the</p>	<p>Page 16, paragraph 3.22 will be amended to indicate that where</p>

		document for clarity:- <i>“The Highway Authority may require the developer to enter into a legal agreement to fund appropriate mitigation traffic management measures on the adjoining local highway network where on completion of the development associated over-spill parking causes demonstrable harm to the public highway in terms of capacity, operation or safety”.</i>	parking arising from the development is likely to cause demonstrable harm to the public highway in terms of capacity, operation or safety the developer may be required to enter into a legal agreement with the Council or the Highway Authority to fund traffic management or other appropriate mitigation measures such as Traffic Regulation Orders, traffic signs and markings to control where and when parking takes place, or for loading bays or other on-street parking improvements.
5/2	1 resident	<u>Page 16 Para 3.25 - Residents Parking Schemes:</u> In this paragraph, it is stated that: " Civil parking enforcement is not in operation in the Borough.....". Again, no reference to the more general car parking arrangements, where penalty notices are issued for overstaying and non-display of parking tickets or permits. This will also affect new residents.	References to public car parking and use of penalty notices are not considered relevant to the SPD.
Section 4: The Design of Car Parking Places			
12/7	Beaulieu Properties	<u>Page 17 Para 4.1 – Parking to be Convenient</u> On mixed-use and mixed-plot developments, the inability to consider all uses together and provide dual-use parking could likely lead to a car dominated environment with many spaces lying empty through different times of the day and night. All the site should be considered if appropriate with dual-use parking permitted if the developer/applicant is content to do so.	Paragraph 4.1 requires that all parts of a development be self-sufficient with regard to their parking provision with parking provided within a reasonable walking distance. Parking places can be shared by a range of uses if the developer can demonstrate this will be effective in meeting the needs of all users in accordance with the objectives of the SPD.
12/8	Beaulieu Properties	<u>Pages 17 & 18 Paras 4.2 -4.4 and 4.7 – 4.8 Layout and Access & Car Parks & Roadside Parking</u> The policies as worded could potentially lead to an over engineered car and highway dominated environment and there should be some flexibility to allow a better high quality scheme to be designed if this can be agreed between the developer/applicant and local authority. This runs counter to the aspirations of the current draft Design SPD.	Manual for Streets states that streets should not be designed just to accommodate the movement of motor vehicles and it promotes the creation of environments that are attractive, convenient and enjoyable to use for everyone. There is sufficient flexibility in the SPD to achieve high quality schemes.

6/5	1 resident	<p><u>Page 18 Size of Parking Spaces</u> <u>Plan below Para 4.8</u> The plan is very small with insufficient turning areas. Vegetation close to the main highway will obstruct visibility from the 4 space and 3 space parking areas.</p>	<p>The plan adequately illustrates the design factors raised in Section 4 and in the notes below the diagram. Note (1) says <i>Ensure adequate visibility between parking places, road and footway</i> is provided. Note (7) says <i>Provide space at end of aisles to help vehicles initiate a turn</i>. The wider end space, combined with the radius and the 2.0m extension of the aisle shown are adequate to do this.</p> <p>Page 18, paragraph 4.7 will be amended to clarify that the diagram (plan) is to be read with the notes below.</p>
11/3	Milln Gate Properties	<p><u>Page 18 Size of Parking Spaces</u> Millngate is concerned that the SPD does not provide justification for the minimum car parking space / aisle widths and does not allow for flexibility. For example, where end spaces are not constrained and therefore there is limited justification for the proposed standard, an allowance should be made for a reduced width of car parking space. It is therefore recommended that the SPD is amended to allow for flexibility in the size of spaces, where appropriate.</p>	<p>The growing width of vehicles and the associated problems is evident from review of manufacturer's specifications and observation of parking places in use. The minimum dimensions of 4.8m x 2.4m has been used for 20 years and within that period the average car and the largest cars have grown in size due to the need to provide added crash protection, the desire for more space and design fashions. Proposed parking spaces in developments need to conveniently accommodate a range of larger cars which now commonly have a body width circa 1.8m. This leaves only 0.3m to the edge of the parking bay and a space between two similar cars of just 600mm. It is difficult for larger vehicles to manoeuvre into the current standard space, especially if adjacent cars are not parked centrally. A width of 600mm is also inadequate for passengers to comfortably access vehicles and damage to adjacent vehicles from doors is common. These issues are explained more fully in the attached articles. http://www.halfordscompany.com/media-centre/press-releases/consumer-news/rash-of-car-park-scratches-irritate-uk-drivers http://www.dailymail.co.uk/news/article-2422335/Shrinking-parking-spaces-wider-cars-leads-500million-repairs-year-bumps-scrapes.html</p>
12/11	Beaulieu Properties	<p><u>Page 18 Size of Parking Spaces</u> Beaulieu Properties are concerned regarding the proposed design and provision of parking spaces. Of central concern is the recommended change of parking space size which appears to be a local policy and does not follow any current national guidance. Is this policy to apply to un-adopted as well as adopted spaces? Is there a presumption that Gosport Borough Council will be remarking all of their own car parks to comply with their new policy?</p>	<p>The aisle width of 6.0m is widely used and proven to provide a</p>

			<p>fair balance between convenience of access and efficient use of space.</p> <p>Paragraph 4.9 indicates that spaces only need to be enlarged where they are restrained in useable width and examples are shown in the figure showing Minimum Dimensions of Parking Places.</p> <p>We are not aware of national guidance on this issue but other authorities are promoting improvements, including Essex who advocate an absolute minimum parking space of 5.0m x 2.5m and a preferred minimum of 5.5m x 2.9m. The proposed increase in minimum width from 2.4m to 2.5m is a modest improvement aimed at achieving a reasonable compromise between convenience and capacity</p> <p>The minimum dimensions for a parking space applies to all new development. There is no obligation to revise existing car parks.</p>
6/6	1 resident	<p><u>Page 19 Para 4.11 - Driveways etc.</u> The photos under Page 19 Para 4.11 show driveways too short to occupy multiple parking used at Fort Road for example. Driveways are often used for home vehicle maintenance, and no mention is made of this or of the implications thereof. The pavement in the photo is obstructed by the protruding car.</p>	<p>It is considered self-evident that this photograph is illustrating bad practise. Paragraph 4.11 does identify the need to accommodate maintenance, however page 19, paragraph 4.11 will be amended to clarify that there should be sufficient space around vehicles to allow convenient and safe loading and unloading and enable vehicle cleaning and maintenance <i>without encroachment upon the adjacent footway or road.</i></p>
6/7	1 resident	<p><u>Page 20 Para 4.19 – Under Croft & Basement Parking</u> Such places are inherently very cold. Implications for heating of properties above.</p>	<p>It is not appropriate to address this issue in the Parking SPD. This might be a matter for consideration under the Building Regulations.</p>
2/3	1 resident	<p><u>Page 21 Para 4.23 – Minimum Size of Garages</u> Agrees with the Parking SPD stance in relation to garages / appropriate sizes.</p>	<p>Support noted.</p>

6/8	1 resident	<p><u>Page 21 Para 4.23 – Minimum Size of Garages</u> The need for simultaneous car and other storage should be addressed more directly. Reserve furniture etc occupies a lot of space, and the desirable minimum standards should reflect this.</p>	<p>Paragraphs 4.23 and 4.24 have increased garage sizes above former standards to improve the potential for both parking and storage. It is not considered appropriate that this SPD require developers to provide further storage space in garages.</p>
6/9	1 resident	<p><u>Page 22 Para 4.26 – Conversion of Garages</u> The conversion of garages to form additional habitable rooms should have a blanket prohibition, to prevent the problems identified arising.</p>	<p>A blanket prohibition is not considered to be reasonable, but planning conditions can be applied to ensure garages necessary to meet the parking requirement are retained for the purpose. Page 22, paragraph 4.26 will be amended to clarify that where garages contribute to the car parking or cycle parking provisions of a site, and <i>are necessary to meet the parking standards</i>, planning conditions will be applied to ensure they are kept available for that purpose.</p>
Section 5: Cycle, Motorcycle, Electric & Commercial Vehicle Parking Requirements			
6/10	1 resident	<p><u>Page 27 Para 5.20 – Commercial Vehicle Parking</u> The minimum amount of space required for loading, unloading, short and long stay parking should be identified for all categories of premises, including residential, and not left to the throwaway remark 'It is therefore not possible to prescribe in these standards the number or size of parking spaces required or the access requirements'.</p> <p>Para 5.20 as presently worded directly contradicts Para 3 opposite on Page 28.</p>	<p>The SPD notes that commercial parking requirements vary with the type of enterprise. Accordingly it is difficult to identify a universal standard for the number and size of commercial vehicle parking places in each class. Developers are required to consider the needs of each site and make access and parking provisions for commercial vehicles which avoid interference with the function and safety of the highway and enable vehicles to circulate, load and unload in safety and with reasonable convenience.</p> <p>These paragraphs address different matters and there is no contradiction.</p>
12/9	Beaulieu Properties	<p><u>Page 27 Paras 5.20 & 5.21 - Commercial Vehicle Parking</u> These paragraphs are supported in that they recognise the inability to prescribe standards and that schemes should be dealt with on a case by case</p>	<p>The principle that developers determine the commercial vehicle parking requirement is repeated in other parts of the document and at Appendix A in the introduction to the standards tables.</p>

		basis. This could be usefully echoed throughout the document, or at the outset as an overriding principle throughout the document, where standards can be departed from where individual requirements require and subject to high quality layouts.	
12/10	Beaulieu Properties	<p><u>Page 27 Para 5.22 - Commercial Vehicle Parking</u></p> <p>It should be noted that where such uses are infrequent, it is not desirable to have a specific dedicated service bay. These uses which could last for 15 minutes or less in a week or a day are capable of being serviced on internal access roads without dedicated bays or on the highway where sufficient carriageway width and speeds permit.</p>	Paragraph 5.22 does not preclude on-street loading and unloading. It would generally be permitted for short periods where it does not interfere with the safety and function of the highway. There will be a need to consider how space is safeguarded on-street to enable deliveries, for example through the use of traffic regulation orders.
Appendix A – Parking Standards			
11/1	Milln Gate Properties	<p><u>Parking Standards</u></p> <p>Millngate is concerned that the proposed minimum parking standards set out in Appendix A do not appear to be based on any evidence and are not therefore justified against the NPPF. Further explanation and justification as to the approach taken to calculating the proposed standards is required. Notwithstanding this, Millngate notes that the SPD allows for flexibility at paragraphs 2.10 and 2.14 and Appendix A (paragraph 2), which states, “Variations in standards will be considered where justified by the Design and Access Statement or Transport Assessment and having regard to similar developments in comparable locations”.</p>	<p>The proposed standards are largely based on the Hampshire County Parking Standards published in 2002 and adopted by the Borough Council in the 2006 Local Plan Review. These standards have been reviewed in the light of local experience and developer, member and public feedback received through the undertaking of the Development Control and Traffic Management services. The review was also informed by observations of residential development around the Borough to assess what standards of parking work well and where there are problems. The published parking standards and research work of other Districts Councils were referenced including that of Fareham, Havant, Eastleigh, Southampton and New Forest and with regard to comparative car ownership levels. Reference was also made to research by the Department of Communities and Local Government (Residential Car Parking Research) and English Partnerships. (Car Parking What Works Where).</p> <p>The Hampshire Standards were published to accord with Government Guidance set out in the Planning Policy Guidance documents PPG13 and PPG3 which required maximum parking</p>

		<p><u>Variations to Standards</u> For consistency and the avoidance of doubt, it is recommended that all tables should include a footnote which clearly states that a variation to the standards will be allowed where this is demonstrated to be acceptable in either a Transport Assessment or Design and Access Statement. This should also be made clear in the main text of the SPD.</p> <p>Whilst Millngate welcomes the approach to flexibility, it is concerned that this message is not made consistently throughout the main text of the SPD. There is also ambiguity to the approach to flexibility in the footnotes provided to the tables in Appendix A. For example, Table 2 (Commercial Development), footnote 3 states: "The developer must determine the commercial vehicle parking standards on the merits of individual applications in his Design and Access Statement or Transport Assessment". Table 3 (Retail Development), footnote 2 uses different wording and states: "The developer must determine the commercial vehicle access and parking requirements on the merits of individual applications in his Design and Access Statement". It is considered that these</p>	<p>standards to be set to discourage car ownership and promote the use of sustainable modes of travel. This guidance is now replaced by the National Planning Policy Framework and planning authorities are encouraged to set their own parking standards to meet their own needs. There is no national or local policy to deter car ownership. Experience showed there where developments provided the maximum allowed parking provision they generally performed adequately and the former maximum standards are now recommended as a minimum.</p> <p>Some of the Hampshire Standards have been adjusted to reflect local experience of particular types of development, for example a reduction in the car parking requirement for marinas and an increased requirement for car parking at doctors surgeries and cycle parking in schools.</p> <p>It is not considered necessary to add a footnote to every table, however to supplement the message at paragraph 2.14 Appendix A, paragraph 2 will be amended to ensure there is a clear and consistent message that variations to the standards will be allowed where this is demonstrated to be acceptable in supporting information.</p> <p>Noted. Amendments will be made to Page 27, paragraph 5.21 and page 28 Appendix A and the notes below tables 2 - 8 to provide consistency. It will also be indicated that when determining the standards of commercial vehicle access and parking regard must be given to the likely needs of prospective occupiers present and future.</p>
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		inconsistencies will only lead to confusion as to the approach the Council will take to determining planning applications. Clarification is therefore required to avoid any ambiguity.	
6/11	1 resident	<u>Page 30 Table 1a – General Residential</u> Columns 1 & 2 cause confusion. For 4+ bed units, does the Col 2 description 3 spaces per unit = 4x3 = 12 spaces, or 3 spaces in total for the 4+ bed unit? The wording must be clarified. Developers will take advantage of any ambiguity.	Columns 1 & 2 indicate that dwelling units with 4 or more beds require 3 allocated spaces per unit. This is not considered to be ambiguous.
13/10	Robert Tutton Planning Consultants	<u>Page 30 Table 1a – General Residential</u> 'General Residential' car parking standards should not be expressed as minima where the dwelling is within 400 metres of a frequent bus service.	For reasons explained at reference 13/3 and 13/7 in respect of accessibility to public transport it is not accepted that proximity to a bus stop automatically, and in every case, has a significant bearing on car ownership.
17/1	PDT Hampshire	<u>Page 30 Table 1a – General Residential (Note 1)</u> What level of communal parking is required if allocated parking is provided but not at the full SPD standard – for example if two bedroom flats are allocated a single space?	The SPD provides no standards for a mix of allocated and unallocated spaces for individual dwellings, though such arrangements are acceptable. Guidance on how to determine the communal parking requirement for dwellings with one or two allocated spaces is available in the Communities and Local Government publication: Residential Car Parking Research, 2007. Note 1 to Table 1a will be amended to make reference to this guidance.
17/2	PDT Hampshire	<u>Page 30 Table 1a – General Residential (Note 2)</u> <u>Visitor Parking</u> There is a discrepancy in the SPD where in the main body it refers to visitor parking as 0.2 spaces per dwelling with allocated parking spaces and the Appendix where it requires “an additional 20% of the required number of spaces for visitors”.	The requirement is 0.2 spaces per dwelling. An amendment will be made to note 2 to Table 1a for consistency.

17/3	PDT Hampshire	<p><u>Page 30 Table 1a – General Residential / Social Housing</u></p> <p>Should there be a reduction for social housing, whether across the whole site or just those units provided under council policy and if so how should that be calculated? My (limited) understanding from RPs has been that changes in legislation make it not impossible but much less likely that rented accommodation will be bought by the tenant than was the case in the past, in part because of the maturity of the shared ownership concept.</p>	<p>Separate standards for social housing have not been provided because there is a variety of types of ownership and tenancy for which we do not have local data to justify specific reductions below the general housing reduction. Further there is potential through the life of the housing for it to become owner-occupied market housing.</p> <p>Social housing also tends to be higher density and if it has inadequate off-street parking the streets are often less able to accommodate overspill than in lower density market housing areas.</p> <p>See also 13/5 - Tenure / Affordable Housing.</p>
15/1	McCarthy and Stone	<p><u>Page 31 Table 1b – Extra Care Housing, Residential Care Homes and Nursing Homes</u></p> <p><i>Retirement Housing (Category II Housing)</i></p> <p>(1) My client is concerned that the proposed SPD does not provide parking standards for Retirement / Sheltered Housing (Category II) Housing. Retirement housing offers self-contained accommodation with communal facilities and services for individuals aged over 60, although the average age of residents in a typical McCarthy and Stone Later Living retirement housing development is 78.</p> <p>(2) Specialised housing for the elderly, because of its very nature and concept, is invariably located within reasonable walking distance of shops and other essential services and close to public transport facilities. It is widely accepted that the car parking requirements for retirement (Category II) housing are significantly lower than for general needs housing.</p> <p>(3) McCarthy and Stone have managed to successfully argue this point both through the planning application process and at appeal. I would</p>	<p>It is accepted that housing available only to the elderly, and for people requiring domestic support and personal care will likely have a lower parking need than general housing.</p> <p>A variety of development is available under such labels as 'Independent Living', 'Retirement Housing', 'Later Living' and 'Extra Care'. These types of development offer a range of communal facilities and differing levels of domestic support and personal care. Due to the inconsistencies of terminology and the variable parking needs it is difficult to define relevant standards. It is therefore proposed that the SPD be amended such that the parking requirements of retirement homes, sheltered housing, extra care housing and the like should be determined on a case by case basis.</p> <p>The standards for Residential Care Homes and Nursing Homes will remain.</p> <p>The title to Table 1b will be amended to <i>Retirement / Sheltered / Extra Care Housing; Residential Care Homes and Nursing</i></p>

	<p>like to bring forward the following appeal decision to your attention:</p> <p>The Appeal Decision (Appeal Reference no. APP/D012/A/07/2045424 for McCarthy and Stone Retirement Living Scheme at 54 Old Church Road, Clevedon. The development provided 41 units with 13 parking spaces, a ratio of approximately 1 space to every 3 apartments and was refused on the grounds of inadequate parking provision by the Council. This level of provision was however deemed wholly appropriate at Inquiry. McCarthy and Stone also received the Costs of this Inquiry given the inflexible and unrealistic stance taken by the Council to parking.</p> <p>(4) Presently the Draft SPD does not provide parking guidelines for Retirement / Sheltered Housing and as such this form of development could be subject to the guidelines for general residential development, which would be inappropriate.</p> <p>(5) We do however appreciate that may simply be an issue with terminology associated with specialist accommodation for the elderly. This is because the parking standards detailed for Extra Care accommodation in Table 1 are usually associated with Retirement / Sheltered housing. To illustrate this, we would like to refer you to the recently adopted South Gloucestershire Council Parking Standards SPD's. This SPD proposed bespoke car parking standards for both Independent Living housing (e.g. Category II housing) and Extra Care Housing both of which are lower than those of general needs housing – parking requirements of 1 space per every 2 dwellings and 1 space per 4 dwellings respectively.</p> <p>(6) On this basis we recommend substituting the guidance in Table 1 for Extra Care Accommodation to Retirement / Sheltered Housing.</p>	<p><i>Homes</i> and there will be a requirement for developers to determine the parking standards for cars and cycles through a Design and Access Statement or Transport Assessment or other supporting information. A general indication only of possible parking needs will be provided and guidance will be added on the details required in support of the application to justify the parking proposals.</p>
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		<p><i>Extra Care Housing</i></p> <p>(7) As mentioned previously, the parking guidance detailed in Table 1 of the SPD is better suited to Retirement / Sheltered (Category II) housing rather than Extra Care Accommodation. “Extra Care” schemes, described as “Assisted Living: Extra Care” developments by McCarthy and Stone, differ crucially from Category II housing in that they are specifically developed with the “frail elderly” in mind. Typically the average age of residents in these developments is 83. As such, Extra Care developments provide a higher level of facilities and greater provision of care and support and are generally considered to be the stepping point between more traditional forms of sheltered housing and nursing homes.</p> <p>(8) Once again, due to the age and frailty and the intended residents, Extra Care developments have lower levels of car ownership than retirement / sheltered (Category II) housing. The Council’s proposed car parking guidance for residential care and nursing homes in Table 1, 1 space per 4 dwellings, is a more appropriate standard for this form of development</p> <p>(9) We therefore respectfully request that Table 1 be amended by incorporating Extra Care Accommodation with the standards proposed for Residential Car and Nursing Homes.</p>	
15/2	McCarthy and Stone	<p><u>Page 31 Table 1b – Extra Care Housing, Residential Care Homes and Nursing Homes</u></p> <p><i>Cycle Parking</i></p> <p>(1) We consider the requirements for cycling provision to be unrealistic for specialist accommodation for the elderly. While the standards proposed for Extra Care accommodation and</p>	The proposed amendments to the SPD invite developers to assess all parking needs, including the cycle and mobility scooter parking requirements case by case whereby the nature of the development, the likely mobility of the residents and the local facilities influencing

	<p>Residential Care / Nursing Homes are lower than those for general needs housing, they still appear excessive.</p> <p>(2) McCarthy and Stone have over 1,000 developments in the UK and commissioned the Traffic and Transportation consultant, Dr Alan Burns, to assess the level of bicycle usage in their Later Living (Category II) schemes, i.e. developments aimed at the more "active" or independent elderly. A copy of the report is attached. This research revealed that bicycle ownership amongst residents of these developments was marginal at 2%, or approximately 1 unit per 117 apartments. Bicycle storage could often be accommodated without the need for specialist facilities, typically within the electric buggy, mobility storage facilities. In Extra Care accommodation, where frailty amongst residents is much higher, it would be reasonable to assume that the level of bicycle usage ownership would be even lower.</p> <p>(3) We accept that there are clear benefits to encouraging cycling as a means of transportation, both in terms of sustainability and the health of residents (within reason). We also acknowledge that the provision of bicycle storage could potentially encourage residents to cycle as an alternative means of transport. There is little point however in asking developers to provide redundant facilities.</p> <p>(4) We therefore respectfully request that the Council significantly reduce the cycle storage standards proposed and suggest a standard of 1 storage space for every 15 units for Category II housing.</p> <p>(5) It is counter-intuitive to suggest that residents who have moved into Extra Care accommodation and Residential Care / Nursing home for reasons of health</p>	<p>the need, desire and ability to cycle can be accounted for.</p> <p>It is not clear if the assessment by Dr Alan Burns is representative of the cycle parking provisions residents would like to have in Gosport, where cycle use is far higher than the national average. Nor is it clear if the very low cycle ownership reported results from a lack of convenient facilities on the sites surveyed. However where this research has relevant data on comparable sites it can be taken into account in determining parking need.</p> <p>There is no cycle parking standard for residents of Residential Care Homes and Nursing Homes. However 'Extra Care' can be provided in a broad range of sheltered housing where a proportion of</p>
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		and frailty will need regular access to a bicycle. We would therefore suggest that the requirement for bicycle storage is removed for these types of development.	occupants may be mobile and wish to cycle.
11/2	Milln Gate Properties	<p><u>Page 32 Table 3 – Retail Development</u> Table 3 applies different standards for ‘covered’ and ‘uncovered’ retail but does not set out the reasoning for the difference or whether the standard applies to the part of a scheme that is ‘uncovered’ or to the scheme in its entirety. Clarification is required on what the SPD considers to be ‘uncovered’, for the avoidance of doubt.</p>	<p>The standards for uncovered retail areas are applicable to areas displaying bulkier goods, or goods not requiring total weather protection and generally attracting a lower density of shoppers than enclosed shops and stores - and hence have a lower parking requirement.</p> <p>For clarification it is proposed to add a note following Table 3 to indicate that covered areas are typically shops or stores where retail areas are fully or substantially enclosed in a permanent building normally with heat and light. Uncovered areas are retail spaces such as builder’s yards and the ‘outside’ areas of garden centres which are substantially open to the weather, but may be covered in part by canopies or other light structures offering only partial enclosure.</p>
7/1	Hampshire County Council	<p><u>Page 33 Table 4 - Educational Establishments</u> HCC are pleased to see that the recently adopted School Parking Standards have been included in the SPD.</p>	Support Noted.
6/12	1 resident	<p><u>Page 35 Table 5 – Health Establishments</u> Ignores the collective effects of a backlog of patients with more waiting at the end of consultation periods. Also, car parking standards must reflect actual rather than anticipated logjam periods.</p>	To improve parking for patients waiting the standards in the draft SPD are set 20% above the current Hampshire Parking Standards. Page 35, Table 5 of the SPD will also be amended to include a minimum car and cycle parking provision for treatment rooms.

Appendix B – Guidance on Cycle Parking Provision

No comments received.

Appendix C - References

No Comments received.