

Annex 1: Pembrokeshire County Council Draft Parking Standards Supplementary Planning Guidance Consultation Report May 2013

Ref. No.	Individual/ Organisation	Representation summary	PCC Response	Recommended change to SPG (if required)
1	Mr. Gareth J. Scourfield, Pembroke Design	<i>Representation 1:</i> Clause 5.1 – the parking ratios appear to be very fair in their approach, but should the table as well as the text refer to the numbers being ‘maximum’ as on occasion all parties should have flexibility in negotiating final numbers, and the increased size of garages to be suitable for disabled users may prove to be problematic in practice on tighter sites. Could this be reviewed?	Paragraph 3.5 makes it clear that the parking standards set out in this document indicate the maximum parking requirement in new developments. This applies across all the tables, except in the cases of disabled parking and cycle parking, where the text makes it clear that ‘minimum’ standards apply.	No change required to SPG.
2	Mr. Gareth J. Scourfield, Pembroke Design	<i>Representation 2:</i> Clause 5.8 – the number of spaces required for Health Centres and Surgeries may prove to be problematic on some town centre sites where perhaps greater reference should be made to using public transport, or even good old ‘shanks’ pony’ so patients get the exercise they so often badly need.	Paragraph 3.5 indicates that the parking standards are maximum standards. Therefore on constrained town centre sites, which will often offer good travel choices, including opportunities to use public transport and to walk, a reduced provision could be considered.	No change required to SPG.

Annex 1: Pembrokeshire County Council Draft Parking Standards Supplementary Planning Guidance Consultation Report May 2013

Ref. No.	Individual/ Organisation	Representation summary	PCC Response	Recommended change to SPG (if required)
3	Ms. Rose Freeman, Planning Policy Officer, The Theatres Trust	<i>Representation 1:</i> We note the inclusion of theatres on page 18 under 5.6 Places of Entertainment, but advise that the provisions are not adequate. Commercial vehicles, especially trucks with sets and costumes (for) theatres, require turning and backing-in space to unload, not just a parking space.	The purpose of this SPG is to indicate the parking requirements associated with new development. Associated arrangements for turning and backing-in of vehicles would need to be provided by applicants, as an element of their planning applications. PCC highway engineers can advise on this aspect at pre-application stage, if required. They will also provide technical advice on access proposals included within planning applications.	No change required to SPG.
4	Ms. Rose Freeman, Planning Policy Officer, The Theatres Trust	<i>Representation 2:</i> No bicycle racks for anyone?	This is covered in section 6 (minimum cycle parking standards), where the term 'stand' is used rather than 'rack'.	No change required to SPG.

Annex 1: Pembrokeshire County Council Draft Parking Standards Supplementary Planning Guidance Consultation Report May 2013

Ref. No.	Individual/ Organisation	Representation summary	PCC Response	Recommended change to SPG (if required)
5	Mrs. Linda Jones, Acanthus Holden	<p><i>Representation 1:</i> Whilst SPG for parking is welcomed in principle, this guidance will result in rural housing developments dominated by cars, car parking spaces and garages. The Wales Parking Standards have been used as a basis but have then been amended without, in my opinion, full consideration of the consequences. According to the proposed guidance, a starter home in a rural part of Pembrokeshire (zone 5 and presumably 6) with a footprint of say 39m² (many are built less than this) will need 34.6m² of space for parking cars excluding garage or driveway. If there are five of them this will increase to 36.9m². All new planning applications in Wales are subject to the Code for Sustainable Homes and if the Secured by Design option for gaining credits is sought or in the case of housing associations required under DQR, then the parking spaces need to be in view of the living room or within the curtilage of the dwellings. If the first option is chosen, then the easier way to comply is to have a row of parking spaces in front of the house. Side by side that would result in a 7.5m plot width being required. With a small house width of around 5m, terraces are therefore unlikely to be developed. If the second option is chosen, and the parking spaces are accommodated within the curtilage of the dwelling, then a driveway will be required and the area of hard standing will need to increase again. Terraces are not possible without a considerable set-back from the road. Under the new LDP, development in Zone 5 and 6 settlements is only really feasible for Affordable Housing, so all the above really do matter.</p>	<p>Paragraph 3.5 makes it clear that the parking standards set out in this document indicate the maximum parking requirement in new developments.</p> <p>This applies across all the tables, except in the cases of disabled parking and cycle parking, where the text makes it clear that 'minimum' standards apply.</p> <p>There will be many cases where a parking provision at a lower level than the maximum will be appropriate.</p>	No change required to SPG.

Annex 1: Pembrokeshire County Council Draft Parking Standards Supplementary Planning Guidance Consultation Report May 2013

Ref. No.	Individual/ Organisation	Representation summary	PCC Response	Recommended change to SPG (if required)
6	Mrs. Linda Jones, Acanthus Holden	<p><i>Representation 2:</i> A 6m driveway leading to a garage will not accommodate 3 cars, as required in zone 5 – if my understanding is correct a two bedroom house will require an 11m x 3.6m driveway to have a garage.</p>	<p>If a suitably sized garage is to be counted as a parking space, then it must also have a drive of at least 6m length. This is a highway safety requirement.</p> <p>The zone 5 residential / new build / conversion requirement for a house is a maximum of 3 spaces per house for residents. However, the parking provision could be less than 3 spaces.</p> <p>A drive longer than 6m would only be needed if the maximum of three vehicle spaces was being proposed.</p> <p>Parking provision can also be designed into the street scene and provided on street where appropriate.</p>	No change to SPG required.

Annex 1: Pembrokeshire County Council Draft Parking Standards Supplementary Planning Guidance Consultation Report May 2013

Ref. No.	Individual/ Organisation	Representation summary	PCC Response	Recommended change to SPG (if required)
7	Mrs. Linda Jones, Acanthus Holden	<i>Representation 3:</i> The size of garage suggested is larger than that set out in the All Wales Parking Standards and Manual for Streets – is this necessary?	The size proposed by the SPG is intended to meet disabled access requirements. Such a provision would increase the flexibility and adaptability of a property to meet the needs of all members of the community.	No change to SPG required.

Annex 1: Pembrokeshire County Council Draft Parking Standards Supplementary Planning Guidance Consultation Report May 2013

Ref. No.	Individual/ Organisation	Representation summary	PCC Response	Recommended change to SPG (if required)
8	Mrs. Linda Jones, Acanthus Holden	<p><i>Representation 4:</i> Whilst I appreciate the importance of the car as a means of transport in rural areas, surely this has to be in proportion to the size of the development? The Wales Parking Standards relate the number of parking spaces to the number of bedrooms being provided. This, whilst not perfect, does allow some proportionality to be applied.</p> <p>In the current proposals, the result is that a 2-bedroom, 4 person starter home and garage in a zone 5 area will have a footprint of 39m² and a hard standing of 39.6m² – as much space for cars as for living.</p> <p>We are in need of smaller dwellings, family units are smaller and the housing need figures for many areas ask for 2-bedroom units. It will not be worth building 2 bedroom units in rural areas if the plot size has to accommodate so many cars. The plot width will have to be bigger to take the cars. Developers might as well build bigger.</p>	<p>Paragraph 3.5 makes it clear that the parking standards set out in this document indicate the maximum parking requirement in new developments.</p> <p>This applies across all the tables, except in the cases of disabled parking and cycle parking, where the text makes it clear that ‘minimum’ standards apply.</p> <p>There will be many cases where a parking provision at a lower level than the maximum will be appropriate.</p>	No change to SPG required.

Annex 1: Pembrokeshire County Council Draft Parking Standards Supplementary Planning Guidance Consultation Report May 2013

Ref. No.	Individual/ Organisation	Representation summary	PCC Response	Recommended change to SPG (if required)
9	Mrs. Linda Jones, Acanthus Holden	<p><i>Representation 5:</i> Has this SPG been tested against the impact it will have – i.e. how many settlements come into zone 4 and zone 5? If this test is done, could they not be listed? If it has not, shouldn't it? Zones 1 to 3 are related to towns with railway stations. Most other villages will come into zones 4 or 5.</p>	<p>The approach to zoning being used by the Council is set out in paragraph 3.3 of the SPG. Zone 1 is spatially defined on maps, while zones 2 to 6 have a narrative description.</p> <p>Applicants outside zone 1 will be expected to indicate which of zones 2 to 6 they consider their proposal is situated within and why they have reached this conclusion. In its evaluation of proposals at application stage, the Council will consider whether the applicant's zoning indication is correct or otherwise and will, if necessary, propose an alternative.</p> <p>As previously recorded, the parking standards are maximum standards and there will be many cases where a parking provision at a lower level than the maximum is appropriate.</p>	No change to SPG required.

Annex 1: Pembrokeshire County Council Draft Parking Standards Supplementary Planning Guidance Consultation Report May 2013

Ref. No.	Individual/ Organisation	Representation summary	PCC Response	Recommended change to SPG (if required)
10	Mrs. Linda Jones, Acanthus Holden	<p><i>Representation 6:</i> A lot of work has been done in the LDP to size settlements into rural towns, service villages, etc'. Why doesn't the planning SPG reflect this, synchronise and use the same assessment, instead of 'zones'?</p>	<p>The All-Wales Parking Standards, on which the Council's Parking Standards SPG is based, has been adopted by the regional transportation consortium for South West Wales, SWWITCH.</p> <p>Pembrokeshire County Council is a member of SWWITCH and has therefore already committed to the approach being used across the region. This is to provide guidance on the parking provision required in new developments, according to type of development proposed and the zone within which that development is to occur.</p> <p>For that reason, the Council has not been able to develop an approach based on its LDP settlement hierarchy.</p>	No change to SPG required.

Annex 1: Pembrokeshire County Council Draft Parking Standards Supplementary Planning Guidance Consultation Report May 2013

Ref. No.	Individual/ Organisation	Representation summary	PCC Response	Recommended change to SPG (if required)
11	Mrs. Linda Jones, Acanthus Holden	<p><i>Representation 7:</i> If you discuss good housing estate layout and design in planning terms, you aim to minimise the impact of the car in the street scene. Planners also in general like terraces. This SPG will make it extremely difficult if not impossible to achieve pleasant new developments without car domination. Rural areas can often be the most sensitive to design in. Two spaces per dwelling is often hard enough to accommodate. We shall be designing car parks with housing as the backdrop. This proposal will have a negative impact on our environment. Car parking needs to be proportional.</p>	<p>Paragraph 3.5 makes it clear that the parking standards set out in this document indicate the maximum parking requirement in new developments.</p> <p>This applies across all the tables, except in the cases of disabled parking and cycle parking, where the text makes it clear that 'minimum' standards apply.</p> <p>There will be many cases where a parking provision at a lower level than the maximum will be appropriate.</p> <p>Parking provision can also be designed into the street scene and provided on street where appropriate.</p>	No change to SPG required.