

Parking Standards SPD – Consultation Summary and Proposed Changes Table
Cabinet, 11 January 2016

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Ward Councillor and Parish Council responses		
CMK Town Council	The draft Parking Standards SPD should align better with the CMK Business Neighbourhood Plan. In particular, Campbell Park should be classified as Zone 1, not Zone 2.	<p>The CMK Business Neighbourhood Plan sets the parking standards for CMK and Campbell Park in Table 3. The Plan, as a part of the Development Plan, carries more weight than the SPD and so the parking standards in the Plan are the ones that should be applied.</p> <p>There are, however, a few points which require some consideration in terms of how the Plan’s parking standards are used and reflected in the SPD. Firstly, the Plan’s standards are expressed as the maximum standards (Policy CMKAP T4 (a)) whereas the other standards in the SPD are not. Secondly, the Plan’s car parking standards refer, in part, to the 2005 Parking Standards SPG which will be replaced when the new SPD is adopted. Thirdly, the new SPD includes standards for more uses than the Plan does (eg the SPD provides for Use Classes A4 and A5, as well as providing parking standards for HiMOs).</p> <p>Recommendation: It is recommended that the parking standards for Zone 1 continue to be shown in the Parking Standards SPD and are aligned with those in the CMK Business Neighbourhood Plan as closely as possible.</p> <p>New text needs to be included to clarify that the SPD is a guide and that for CMK and Campbell Park, the starting point must be Table 3 in the Business Neighbourhood Plan. The SPD standards can then be used as guidance for any developments which are not covered</p>

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		<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>by the Plan's standards. The additional text should also make it clear that any parking standards included in other made Neighbourhood Plans would receive more weight than the SPD and that this would be addressed in any decision making process. This would cover any differing approaches in neighbourhood plans other than the CMK Business Neighbourhood Plan.</p> <p>The SPD will cross-refer to CMKAP Policy T4 and a copy of that policy will be included as an appendix.</p> <p>Campbell Park will be moved into Zone 1.</p> <p>Proposed changes to the SPD:</p> <ul style="list-style-type: none"> • Amend Para 1.28 to move Campbell Park into Zone 1 • Amend Table 1 to replace the Zone 1 parking standards with those from the CMK Business Neighbourhood Plan • Include additional text in Sections 1 and 2 to explain the status and role of the parking standards in the CMK Business Neighbourhood Plan • Include a copy of the CMK Business Neighbourhood Plan Table 3 (Parking Standards) and Policy CMKAP T4 in an appendix to the SPD for ease of use.

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	We think that un-allocated residential parking as part of mixed-use developments needs to be addressed.	<p>The CMK Business Neighbourhood Plan states that for developments in CMK where on-street parking is limited or restricted, on-site provision of un-allocated parking may be required at 1 per 3 dwellings.</p> <p>Paragraph 1.24 acknowledges the need to consider local circumstances. The reference in the paragraph is to mixed use leisure/retail development and consideration should be given to providing further clarity as to how parking standards in general in mixed use areas which include residential development will be applied flexibly. In such areas the demand for parking spaces may peak at different times of day for the different uses and this can have the effect of allowing greater sharing or spaces rather than each use having to meet its specific parking requirement. Trip linking can, though, as acknowledged above, result in increased dwell time which reduces the rate of turnover of parking spaces.</p> <p>Proposed changes to the SPD:</p> <ul style="list-style-type: none"> • Add additional text to para 1.24 to include consideration of residential parking alongside leisure/retail mixed use.
	We question the change in methodology for calculating A3 and A4, from gross floor area (GFA) to dining area plus staff.	<p>Agreed, it is recommended that the standards return to gross floor area (gfa)</p> <p>Proposed changes to SPD:</p> <ul style="list-style-type: none"> • For the A3, A4 an A5 uses, use a standard requirement based on gross floor area.

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	We question why the number of parking spaces per staff varies across use class. Why should some jobs require less or more parking than others?	Using gross floor area to calculate the parking requirement would go some way to addressing this. The difference in standards across the Zones reflects the respective access to facilities in the more central zones, as a result of greater choice and frequency of public transport in those areas.
	We think that un-allocated visitor parking for 4+-bed residences should increase to Zone 3 level due to frequent use of these properties as HiMOs.	The CMK Business Neighbourhood Plan sets the parking standards for CMK and Campbell Park in Table 3. The Plan carries more weight than the SPD and so this change cannot be made.
	Likewise, we think the standard for HiMOs in Zone A is too low. What is the data behind this?	The standard for Zone A is based on the existing standard the effectiveness of which over recent years has been considered as part of the preparation of the SPD. Overall, the standard is considered to be acceptable.
	We question why the standard for cycle parking is the same across the Borough and particularly in Zone 1, when there is an underlying assumption that more journeys will be made by alternative modes of transport in Zone 1?	The standards have been benchmarked against other local authorities and are expressed as a minimum so there is the opportunity to seek additional spaces for areas and developments where this is considered to be necessary or desirable.
	We think provision of an outdoor electric supply for residential parking spaces should be required in order to support greater uptake of electric vehicles and the need for home charging.	The provision of an outdoor electric supply for off-street and on-street residential parking spaces is part of the Milton Keynes' Prospectus bid for the Go Ultra Low Cities scheme. Proposed change to SPD: <ul style="list-style-type: none"> • Refer in Section 7 (Electric Vehicles) to the Council's bid and its aspirations for improved access to EV charging points in the MKC bid.

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Campbell Park Parish Council	The Planning & Policy Committee of Campbell Park Parish Council considered the key changes to the Draft Parking Standards SPD at its meeting on the 7 th September 2015.	Noted
	The Committee resolved to support the proposed changes to Tandem parking arrangements but agreed that a reduction in width to 2.3 metres for non-residential parking spaces would make it difficult for some ‘non-blue badge holders’, particularly those of low mobility or larger frame size, to access vehicles.	Noted on the tandem parking point. With regards to the bay widths, the supporting evidence shows that across CMK there is currently a range of width of parking bays. Notwithstanding this, however, the reference to changes to bay widths is to be deleted from the SPD. Proposed change to SPD: <ul style="list-style-type: none"> • Delete Footnote 4 in para 6.9 on page 30 of the draft SPD. • Delete “normally” from the first sentence of paragraph 6.9
	The Committee urged Milton Keynes Council to confirm that the Draft Parking Standards SPD apply to use Class C4 Houses in Multiple Occupation, as well as use Class C3 Residential Dwellings.	We can confirm that to be the case - Table 1, Vehicle Parking Standards provides standards for C4 Houses in Multiple Occupation although larger HiMOs are sui generis and will need to be assessed on a case by case basis using the standards as a guide.

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<p>Clr Pauline Wallis Milton Keynes Council</p>	<p>Quotes the experiences of Conniburrow and Bradwell Common. Our schools on both estates are over run by workers from either the city centre or the council parking on both of these estates. I could not say for sure which school is worse. Both are having problems. The norm is for parents to drop children off at school by car and then drive to work. Finding safe parking outside the school is another matter. Usually a worker got there before them and will be parked there for the rest of the day; Solutions? Why are there no parking spaces for staff behind the civic offices? Saxon Court has no bit of grass for others to lunch. Too many cars not enough spaces. Surely as a visitor to the centre I would prefer to park in the allocated spaces behind the library? The new multi storey car park. Are there going to be spaces for employees?</p>	<p>The draft SPD includes standards for drop-off spaces for schools which, certainly for new school might help to address the problems identified.</p> <p>In terms of the use of the estates for parking by CMK employees this is a management issue, rather than one for the Parking Standards SPD. There are parking spaces for employees in CMK but as it is necessary to pay to park in CMK this leads to motorists seeking free parking which does, unfortunately impact on surrounding estates.</p> <p>Whether parking spaces in the new multi storey car park will be reserved for employees will be a matter for owners and operators of the car park.</p>
<p>Olney Town Council</p>	<p>The standards need to be realistic, taking into account the need for adequate parking e.g. 1 space per desk in office developments, and reflect the fact that more people are staying at home.</p>	<p>Noted</p>
<p>Wolverton and Greenleys Town Council</p>	<p>One representation which concerns the proposed reduction to width of parking spaces. It is appreciated that narrower spaces might lead to availability of more parking spaces but this in itself may not necessarily be beneficial and this council is of the opinion that a width of less than 2.5 m per space is insufficient for safe parking and reasonable/safe access to vehicles.</p>	<p>The reference to changes to bay widths is to be deleted from the SPD. See the response to Campbell Park Parish Council above.</p>

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John Bint (Cllr) MK Conservatives	I SUPPORT the proposal to require additional parking spaces where houses have got tandem parking, in recognition that tandem parking spaces are less convenient to use and will therefore often lead to cars being parked somewhere else.	Noted
	I SUPPORT the proposals to require a greater amount of residential parking spaces, for various categories and in particular, 2-bedroom dwellings in Zone 3.	Noted
	I OPPOSE the proposal to allow non-residential parking spaces to be smaller. Popular small family cars have become larger over the last 20-40 years* (in part because of improved safety standards) and we already have too many examples of spaces that are too small for mainstream models of car. * The recently introduced VW Golf Mk 7 is some 200mm wider than the Mk 1.	Noted. The reference to changes to bay widths is to be deleted from the SPD. See the response to Campbell Park Parish Council above.
	I SUPPORT the provision of specialist parking spaces for electric vehicles but I OPPOSE the proposal that these spaces should count towards the total parking provision. Most people I know with an electric car use it only for their local, urban travel and own a traditional car as well. If we want to encourage modal shift to more electric journeys, we should recognise that, at least for the medium term future (5-15 years), we can best do this by facilitating households to buy an electric car AS WELL AS their traditionally powered car(s).	It is not made clear in the draft SPD, but the electric vehicle parking standards in Table 4, on page 29 is for non- residential developments. For residential development developers are to encouraged to make available an external socket for charging of electric vehicles.

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Deputy Clerk, Newport Pagnell Town Council, reporting for Town Planning & Management Committee	Car ownership in Newport Pagnell (one of the more affluent areas) does not experience lower car ownership in smaller homes.	Acknowledged that for all households in NP north and south, those with no car account for 12.5% to 15.1% respectively. The flexibility within the new SPD provides the opportunity to justify higher or lower standards where appropriate
	No mention of need for kiss and drop for new schools	The Parking Standards include a requirement for drop-off spaces at school which would provide the same function as ‘kiss and drop’.
	Electric vehicles – not taken account of advance in technology and that section would be obsolete before it is published. Charging based on number of spaces is outdated – technological advancements such as solar charged units set in roads and increased battery capacity in electric vehicles will eventually render charging points obsolete.	Advances in technology will help to reduce ‘range anxiety’ for owners of electric vehicles but the testing of vehicle charging lanes is only just beginning and the roll out of the technology (if successful) will be some time off and is likely to begin at strategic sites managed by Highways England. Therefore the charging point network is likely to be required for some years to come and provides a usable solution to today’s problem. It is possible that in future existing charging points could be converted to the new technology as this becomes the norm.

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<p><i>David Stabler</i> <i>MK Association of Local Councils representative to MK Transport Partnership</i></p>	<p>CHANGES RECOMMENDED Pages 9 – 10 and 16 C3 Dwellings 4 bedroom dwellings should have the same allocated parking requirements as 3 bedroom dwellings as proposed and any 5+ dwelling should have 3 parking spaces in all Zones, perhaps 4 in Zone 4.</p> <p>REASON The only difference between 3 and 4 bedroom dwellings is for 4 bedroom dwellings in Zone 4 and I don't follow the logic. It is frequently the case that 5+ bedroom dwellings are occupied by a family with adult children, who for one or more reasons choose or are compelled to live at home for longer. Inevitably they have cars and thus increase the pressure on the allocated parking required on-plot.</p>	<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>The parking standard for 4+ bedroom dwellings in Zone 3 remains unchanged from that in the current parking standards and have been found to be in line with those adopted by other local authorities. No change is proposed.</p>
	<p>CHANGES RECOMMENDED Page 14 HiMOs are not a sub set of Use Class C3 Residential Dwellings they are a separate planning Use Class and therefore should have the prefix C4 added and a bold line added to differentiate them from the C3 Use Class.</p> <p>Currently these are the minimum parking spaces required to meet the MKC Addendum to Parking Standards SPD April 2009. What is being proposed is 1 parking space per 2 bedrooms but this might become a little ambiguous and open to interpretation when dealing with HiMOs with an odd number of rooms.</p>	<p>Use Class C4/ HiMOs has its own standard, separate from C3 Dwellings. Larger HiMOs however are sui generis and will need to be assessed on a case by case basis using the standards as a guide.</p> <p>For Zone A the proposed standard is the same as that in the 2009 SPG. Where an odd number of dwellings would result in a requirement for half a space using the standard, then the number of parking spaces is expected to be rounded up to the nearest</p>

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	<p>My recommendations to leave the number of allocated parking spaces for HiMOs as the current SPD</p> <p>REASON To avoid confusion, retain clarity and to avoid making a change when the current requirements are clear and reasonable.</p>	<p>whole number.</p>

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	<p>CHANGES RECOMMENDED Page 18 Agreed that permitted development rights [PDRs] to erect gates/doors to the front of a ‘drive through’ should be withdrawn.</p> <p>The following additional wording should be added. If planning permission is sought to erect gates/doors to the front of a ‘drive through’ it will only be given if a space equivalent to an allocated parking space, which fully complies with vehicle and parking layouts in Section 7 is provided in front of the gates/doors to enable a vehicle to be parked in front of the gates/doors when opened.</p> <p>REASON A ‘drive through’ is not dissimilar to a car port where the draft SPD recommends that PDRs are withdrawn. However, a key difference is that a ‘drive through’ often has a much shorter crossover to the highway and residents frequently park in front of an enclosed ‘drive through’ blocking the footway.</p>	<p>The concerns with regard to the fencing off of drive throughs is acknowledged. Planning permission would be required for a gate higher than 1m and within 1m of a footway or 2m of a road. From discussion with Development Management officers, the gating of driver-throughs is not generally considered a problem.</p> <p>It is not proposed to recommend the removal of permitted development rights to erect gates or doors to drive throughs. The National Planning Practice Guidance notes that <i>“conditions restricting the future use of permitted development rights or changes of use will rarely pass the test of necessity and should only be used in exceptional circumstances.”</i></p> <p>Additionally it advises that <i>“Area wide or blanket removal of freedoms to carry out small scale domestic and non-domestic alterations that would otherwise not require an application for planning permission are unlikely to meet the tests of reasonableness and necessity.”</i></p>
	<p>CHANGES RECOMMENDED Page 19 In addition to permitted development rights [PDRs] being withdrawn preventing gates/doors to be erected the carport.</p> <p>The following additional wording should be added. If planning permission is sought to erect gates/doors to the front</p>	<p>It would be useful to add a little more explanation to the final sentence of para 4.18 to include reference to consideration that will be given to the parking arrangements if gates or a door are fitted.</p>

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	<p>of a carport/s it will only be given if a space equivalent to the extinguished allocated parking space provided by the carport/s, which fully complies with vehicle and parking layouts in Section 7 is provided in front of the gates/doors to the carport/s or elsewhere on-plot.</p> <p>REASON A carport is classed as an allocated parking space and if planning permission is sought and given and the carport is then fitted with gates/doors it effectively becomes a garage and the allocated spaces are extinguished and must be replaced.</p>	<p>Proposed change to the SPD:</p> <p>“4.18Permitted development rights to erect gates/doors to the front of car ports will be withdrawn and in determining any planning applications consideration will be given to the amount and location of the remaining car parking space(s). “</p>
	<p>CHANGES RECOMMENDED Page 24/25 On-Street parking. Items 4.4 and 4.9 mention that on-street parking should be:</p> <ul style="list-style-type: none"> · <i>“...appropriately designed taking into account the width and nature of the road...”</i> · <i>“It has often been a challenge to fit in on-street parking spaces when numerous detached and semi-detached houses are included in a layout because of the requirement to accommodate and keep open private drives onto the carriageway.</i> <p>A note should be added to say: “On-street parking bays provided on the highway, for any type of development, opposite to a private driveway to a dwelling must be designed to allow a vehicle to be reversed off the private driveway without any impediment to the manoeuvre.”</p>	<p>Noted.</p> <p>Para 4.44 requires on-street parking to be appropriately designed taking into account the width and nature of the road in terms of traffic flow and speed.</p> <p>The relationship between on-street parking and access to private driveways would be assessed as part of the highway layout of any development proposal.</p>

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	<p>REASON To reinforce the remarks in 4.9 about “<i>the requirement to accommodate and keep open private drives onto the carriageway</i>” to allow all vehicles to be reversed off a private driveway without restricting the manoeuvre.</p>	
	<p>CHANGES RECOMMENDED Page 31 Header and sub title reading “<i>Diagram 4 Parking Space adjoining a dwelling/ garage</i>”.</p> <p>Note on plan to Diagram 4 “<i>DWELLING/GARAGE</i>”</p> <p>Add “carport” after Dwelling/garage in header and sub title references [two] and amend the note on plan [one], to read “Diagram 4 Parking Space adjoining a dwelling/ garage/carport.” “<i>DWELLING/GARAGE/CARPORT</i>”</p> <p>REASON To avoid confusion, retain clarity that carports are not dissimilar to garages, so require the same space as in front of a garage or a dwelling and to avoid future problems should planning permission be granted to erect gates/doors to the front of a carport.</p>	<p>Diagram 4 on page 31 shows the need to retain a 1 metre footway/access to the side and front of a parking space where it adjoins a house or garage, so that the occupants of the car have sufficient room to move around the car to access the dwelling.</p> <p>Para 4.17 refers to the need for parking spaces in front of garages to be at least 6 metres long in order to allow access to the garage without a car overhanging the footway. This is also alluded to in the proposed new text to be added to the end of para 4.18 above.</p>

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Local Authority responses		
Housing Policy & Development Team	Pleased to see that the SPD acknowledges a need to reflect local circumstances and the requirements of individual developments when assessing applications.	Noted
Milton Keynes Council	The SPD allows a degree of flexibility for locations where a departure from the standard may be warranted but may otherwise be prevented by the application of a geographical standard in an arbitrary manner.	Noted
	This flexibility will be particularly necessary in regeneration areas and with affordable housing schemes. Our concern is that without this flexibility the proposed standards will have a big impact on viability of new regeneration schemes and the Council housebuilding programme, mainly because of the additional parking requirement – especially for apartments and where tandem parking is provided. For example, currently 2 bedroom flats require a single parking space whereas under the proposed standards they will double to requiring 2 spaces per 2 bed apartment. The only way to accommodate such measures on apartments will be to accommodate car parking under the block at ground floor level as going to basement level is very likely to be unviable, given land values and likely sales figures.	<p>Noted. It is proposed to create a new category for 2 bed flats which would reduce the parking requirement for them. The proposed change reflects the Census findings that there is lower car ownership in flats but balances that against the experience in Milton Keynes that many 2 bed flats are occupied often by families or 2 professionals each having a car.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Table 1, C3 Residential Dwellings: add a new row under 1 bed dwellings called “2 bedroom flats”. The standards to be applied to the 2 bed flats are: <ul style="list-style-type: none"> ○ Zone 1 = 1 space ○ Zone 2 = 1 space +0.33 unallocated ○ Zone 3 = 1 space +0.75 unallocated ○ Zone 4 = 1 space + 0.75 unallocated

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	<p>Consequently a blanket requirement for additional car parking without flexibility in its application will clearly impact on viability. This in turn will negatively impact on Section 106 contributions (S106) or eventually the Community Infrastructure Levy (CIL). Our experience to date has been that such negative effects on S106 contributions can only be paid for by reducing the affordable housing requirement. Given the level of housing need that exists in the Borough, this would be counter-productive.</p>	<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>Noted. The NPPF (para 153) advises that supplementary planning documents should be used to aid applicants make successful applications and should not add unnecessarily to the financial burdens on development. Reference to this paragraph of the NPPF should be added to the end of paragraph 1.5 of the Parking Standards SPD.</p> <p>Proposed change to the SPD:</p> <ul style="list-style-type: none"> • Add a new sentence to the end of paragraph 1.5 to read: “Additionally, the NPPF at paragraph 153 advises that supplementary planning documents should be used to aid applicants make successful applications and should not add unnecessarily to the financial burdens on development.”
	<p>As a result we would like to see a specific statement to the effect that the maximum flexibility will be given with particular regard to regeneration areas, the Council house building programme and affordable housing schemes where the proposed standards would impact on the viability of a scheme.</p>	<p>Para 1.15 acknowledges the need to reflect local circumstances and the requirements of individual developments when assessing applications. To add further weight to this the paragraph could start by making reference to the NPPF para 10 which states that “Plans and decisions need to take local circumstances into account so that they respond to different opportunities for achieving sustainable development in different areas”</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Amend para 1.15 to refer to NPPF para 10.

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	<p>A further point is that accommodating more cars will not enhance the standards of design in Milton Keynes. A general principle of good urban design is that the car should be accommodated but that it should not dominate the street scene. Doubling the parking standard would therefore appear to be counter to this design principle.</p>	<p>The challenge that the change in the parking standards especially for 2 bed properties in Zone 3 is acknowledged. The design guide section at Section 4 attempts to show a number of different ways in which parking, both on and off-plot can be accommodated in a range of developments.</p>
	<p>The Chartered Institution of Highways & Transportation and the Institute of Highway Engineers also make the point that “over provision can result in poor design, wasted space and apparent encouragement to use cars in preference to walking, cycling and public transport.”[1] Consequently it is not clear how the draft car parking standard that seek to increase parking provision sit in terms of promoting public transport, health promotion (such as physical activity), reducing carbon emissions etc.</p>	<p>A valid point, but the parking standards have been prepared in the context of the Local Transport Plan 3 and represent a balance between trying to accommodate sufficient parking to meet the demand of developments whilst still encouraging people to consider alternative modes of transport.</p>
	<p>The SPD notes that where an applicant chooses to provide more or less parking than the standard this would need to be subject to a rigorous assessment. The basis for this appears to be that ‘excessive’ parking beyond the standards indicated is likely to lead to increased car use and therefore contrary to the promotion of sustainable modes. However it is not clear in the SPD when or how ‘more parking’ becomes ‘excessive parking’.</p>	<p>Excessive parking would result in a very car dominated environment. A balance needs to be sought between the highway impact of the development and the impact on public amenity and for example, the availability of adequate and suitable space for the provision of landscaping</p>
	<p>We have some concerns with the statement that contributions towards the provision of high quality public transport will be expected to complement any agreed reduction in parking provision. This is because as mentioned previously, our experience is that S106 contributions tend to be paid for by</p>	<p>Section 106 discussions would involve all relevant departments and service areas. Highways would be part of those discussions and would be respectful of the need to meet the affordable housing requirement for a development.</p>

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	<p>reducing the affordable housing requirement. Also, we feel that paragraph 1.25 of the SPD is unclear when it says that “Contributions towards the provision of high quality public transport will be expected to complement any agreed reduction in parking provision.” We would ask for clarity with regard to ‘contributions’ (e.g. how much and how this compares to what is currently being sought) and ‘high quality public transport’ (what is the definition of this)</p>	
<p>Neil Sainsbury Head of Urban Design and Landscape Architecture Milton Keynes Council</p>	<p>Impact on Character of Development and Continuity and Enclosure (Policy CS13 Core Strategy, NPPF para 64, Local Plan D2 i and ii)</p> <p>1. There is a concern that adoption of these standards will lead to more monotonous and homogenous streetscapes and hence developments with very little character between them due to the fact that most houses will either be set back from the street the same distance (to accommodate independently accessible on plot parking) or there will be large gaps between all houses (to again accommodate independently accessible on plot parking). The latter will impact on Local Plan design policy D2A ii) which requires continuity of frontage and enclosure of space. The lack of enclosure to streets undermines their ability to be of a human scale and amongst other things will promote faster car speeds.</p>	<p>A balance has to be struck between ensuring that adequate parking is provided to meet the demands arising from new developments and the need to ensure and allow high quality design.</p> <p>It is acknowledged that some of the revised residential standards will present challenges for designers in creating attractive and varied layouts, however, the standards are considered to be appropriate based on experience in Milton Keynes and when set against those used by other local authorities. The impact of the Parking Standards SPD will be kept under review as new developments implementing the new standards come forward.</p>

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	<p>Approach to Standards</p> <ul style="list-style-type: none"> • This section should acknowledge that flexibility regarding the application of standards should take place depending on the context. This is particularly applicable for infill developments where the existing context should dictate how the development is laid out and hence how parking is provided (eg Wolverton which has continuous frontages with houses all setback an equal distance from the street). In this case it would be contrary / alien to the existing context to expect independently accessible parking to be provided to the side or fronts of houses • The viability of a scheme should also be included as a factor in terms of the flexibility of the standards (see attached conceptual layouts which demonstrate how densities are reduced when tandem parking is not provided). 	<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>Para 1.15 follows the approach in the NPPF that plans and decisions need to take account of local circumstances so that they respond to different opportunities for achieving sustainable development.</p> <p>Proposed change to SPD: Specific reference to context could be added to paragraph 1.15:</p> <p>“It is also acknowledged there is a need to reflect local circumstances <u>and the context</u> and requirements of individual developments when assessing applications”.</p>
	<p>Tandem Parking</p> <p>1. The Urban Design and Landscape Architecture Team at the Council were the team that did the parking survey of over 1200 households a few years ago and agree that tandem parking is not popular with those residents who have 2 or more cars with the result that the 2nd car often parks on the street (and when the street isn’t designed to accommodate this parked car then problems with the quality of the streetscape arise). We therefore agree with the sentiment that where residents live in a home with tandem parking, space should be provided on street (outside of the carriageway) as close to their front door as possible.</p>	<p>As referred to in the response, the survey of residents did demonstrate the relative unpopularity of tandem parking. That and the experience in a number of recent developments has led to the expression in para 4.16 of the presumption against tandem parking.</p> <p>It is agreed that further to the Suggested Change, that the footnote in para 4.16 needs to be amended to expand on the meaning of “convenient” by specifying that this means provision of on street parking within 15m from the front of a property where tandem parking is provided.</p>

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	<p>We are however concerned that particularly in zone 3 which covers most of where new development will go in MK that the proposed standards will make it difficult to in fact accommodate all the required parking.</p> <p>Please see attached feasibility layouts which demonstrate that where tandem parking is provided the additional requirement for an on street parking space per 2 homes will make it very difficult to accommodate the required parking. It should be pointed out that the conceptual layouts have been done for rectangular shaped blocks that optimise the amount of parking that can be accommodated on street – in reality, blocks are seldom this shape which will make fitting in the required parking even more difficult.</p> <p>Conversely, the conceptual layouts show that the less the amount of tandem parking on a scheme the easier it becomes to accommodate all the required parking but crucially the lower the densities are that can be achieved and hence there is an impact on the viability of the scheme.</p>	<p>MKC Response and recommended changes to the SPD</p> <p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Amend Footnote 3 in para 4.16 to read: “for the avoidance of doubt, “additional” means in addition to the usual requirement for unallocated on-street parking spaces. “Convenient” means an on-street space within 15 metres of the front of the property where tandem parking is provided”.
	<p>A final conceptual layout (entitled ‘various blocks pdf’) combines various conceptual block layouts and includes a realistic proportion of apartments into a 100 unit development. While it meets the parking standards it has only achieved a net density of 31dph which not only may potentially impact on the viability of the scheme but is below the figure of 35dph used to establish things like the 5 year land supply.</p>	<p>Noted but rather than replace the first bullet point of para 4.16, it is proposed to amend the existing footnote to clarify what is meant by ‘additional and convenient’.</p>

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	<p>Suggestion:</p> <ul style="list-style-type: none"> The first bullet in para 4.16 should be replaced with the 4th and 5th bullet within para 3.10.1 of the Residential Design Guide SPD (which already requires a provision of on street parking within 15m from the front of a property where tandem parking is provided) <p>Street widths</p> <ul style="list-style-type: none"> While we agree with the 2nd bullet under para 4.16 we think this should be extended to street types 8 as well (which includes streets of 25 or more homes). This 2nd bullet could be further substantiated by saying as a final sentence, “This requires on street parking to be provided outside of the established carriageway” By implication of the above, street types 9-12 can include on street parking spaces within the carriageway which suggests service delivery vehicles may struggle to get through these streets. We therefore suggest new wording as a 3rd bullet in para 4.16 should say “For street types 9-12, the required on street parking must be clearly laid out / delineated within the carriageway and located in positions so as to allow for the movement of free flowing traffic, including service delivery vehicles.” 	<p>MKC Response and recommended changes to the SPD</p> <p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> Amend Footnote 3 in para 4.16 to read: “for the avoidance of doubt, “additional” means in addition to the usual requirement for unallocated on-street parking spaces. “Convenient” means an on-street space within 15 metres of the front of the property where tandem parking is provided”. <p>Agreed – amend para 4.16 as suggested to clarify the design advice regarding on-street parking.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> Amend second bullet of para 4.16 to read: “the on-street provision must not encroach into the track path of buses on bus routes and other primarily residential streets (type 5-8) so as to allow for the movement of free flowing traffic, including service delivery vehicles. <u>This requires on street parking to be provided outside of the established carriageway</u>”. Add a third bullet to read: “For street types 9-12, the required on street parking must be clearly laid out / delineated within the carriageway and located in positions so as to allow for the movement of free flowing traffic, including service delivery vehicles.”

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	<p>Car Parking Locations On plot parking to the front Para 4.15 should be amended to say the following: "A variation of the on plot parking solution is the provision of right angled or parallel parking to the front of the house. For terraced houses this will likely occur as right angled parking behind the back of the adoptable highway (see figure 2*) while for semi detached and detached housing a deeper front garden or privacy strip should be included (up to say 6m) to allow on plot parking to the front of the dwelling as either right angled or parallel parking. In these cases, the parking spaces should be designed into a landscaped privacy strip to avoid the subsequent ad hoc paving over of front gardens (potentially devoid of any landscaping) by homeowners which will undermine the quality of the streetscape.</p>	<p>MKC Response and recommended changes to the SPD</p> <p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>Agreed , amend para 4.15 of the SPD as suggested:</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Amend para 4.15 of the SPD to read: "A variation of the on plot parking solution is the provision of right angled or parallel parking to the front of the house. For terraced houses this will likely occur as right angled parking behind the back of the adoptable highway (see figure 2*) while for semi-detached and detached housing a deeper front garden or privacy strip should be included (up to say 6m) to allow on plot parking to the front of the dwelling as either right angled or parallel parking. In these cases, the parking spaces should be designed into a landscaped privacy strip to avoid the subsequent ad hoc paving over of front gardens (potentially devoid of any landscaping) by homeowners which will undermine the quality of the streetscape" <p>*Note: check figure numbers and amend further as necessary</p>

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	<p>*Some additional drawings from the Residential Design Guide SPD pg 79 should be included in the SPD L-shaped homes such as used at Oakgrove (see attached photos) also offer a good option of independently accessible parking but have the added benefit of the retention of a strong street frontage and degree of enclosure In all these cases, on plot parking options to the front should complement other parking options rather than be used exclusively so that a varied streetscape character across a development is created.</p>	<p>Agreed – there are other drawings that could be used to illustrate alternative design solutions.</p>
<p>Head of Transport Innovation Milton Keynes Council</p>	<p>I believe the parking standards for EVs needs to be reconsidered. Attached is MK ambitious plans to increase ULEVs in MK with the goal. <i>To achieve the highest uptake of ultra-low emission vehicles per capita for any city in the world by 2020.</i> The prospectus highlights how we will achieve this. See attachment.</p> <p>Therefore rather than the standards reflect what is promoted elsewhere in the UK, I strongly believe they should be set at a level that will support our prospectus. I would be pleased to discuss with you and the consultants how this could be achieved</p>	<p>Given the Council’s bid to the OLEV Go Ultra Low City Scheme, it would be relevant to add some additional detail to Section 2 of the SPD (Parking for Electric Vehicles) in order to raise awareness of the Council’s commitment to this initiative.</p> <p>Proposed changes to the SPD:</p> <ul style="list-style-type: none"> • It is recommended that a new paragraph is added after 2.3 to read: “The Council has recently submitted a funding bid to the OLEV Go Ultra Low City Scheme with the intention of dramatically increasing the numbers of ultra-low emissions vehicles on the city’s roads. Measures in the bid include the Milton Keynes Promise that will guarantee the provision of a charge post near to the homes of owners who do not have off-street parking. The Promise will initially see delivery of 200 night time changing points and work is underway to find a suitable charging post design.”

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<p>Senior Planning and Transportation Officer Planning Policy for Bedford Borough Council</p>	<p><u>Table 1 – Vehicle Parking Standards</u> A3 and A4 use classes and A1 shops. While the text of the document states that parking for goods vehicles should be based on its merits, it is considered that it would be more useful to have this in the table for vehicle parking as a starting point, which should be considered at the design stage. Otherwise it risks being overlooked.</p>	<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>Agreed – it is acknowledged that people using the parking standards are likely to just refer to the Tables rather than reading the background text.</p> <p>Proposed change to the SPD:</p> <ul style="list-style-type: none"> • Include a note at the start of Table 1 to clarify that parking for goods vehicles should be based on its merits
	<p>The text also states that parking areas for coaches will be considered on a case by case basis, but I also think it would be more helpful to state this in the table. For example coach parking for hotels could be an issue if there is not adequate on street parking for a coach near a hotel.</p>	<p>Agreed, as above.</p> <p>Proposed change to the SPD:</p> <ul style="list-style-type: none"> • Include a note at the start of Table 1 to clarify that parking for coaches will also be based on its merits
	<p>There is also no parking provision for outdoor sports facilities such as football pitches. The Bedford Borough Parking Standards SPD contains standards based on the types of pitches as there have been issues with parking at sports clubs and adverse impacts on surrounding residential streets when people block driveways and create congestion in residential streets. Coach parking spaces should also be considered as there are usually mini buses to transport away teams that use a coach for regional events.</p>	<p>Agreed - the inclusion of parking standards for playing pitches, including allowance for minibuses and /or coaches will be considered.</p> <p>In Milton Keynes most new playing pitches are provided in association with a pavilion providing a sports hall and changing facilities.</p> <p>Proposed changes to the SPD:</p> <ul style="list-style-type: none"> • Include a parking standard for outdoor sports facilities with reference to the approach adopted for previous planning permissions in Milton Keynes and with regard to other local authorities’ standards. • Also add a cycle parking standard for these uses

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	<p><u>Table 2 – Cycle Parking Standards</u> The pupil range for Education is confusing as there are two separate rates for pupils up to 11 years of age. To avoid confusion, it should just be one rate for primary school at age 4-11 years.</p>	<p>The different rates reflect that the slightly older age group of 8-11 years olds are more likely to cycle to school than the very young ones. The rate for the ‘all-through’ 4-11 year old school is an average of the other two rates.</p>
	<p>Scooter parking has been identified for educational establishments, but mobility scooter parking should be considered for places where people may be using them such as residential institutions.</p>	<p>Agreed, expand paras 2.7 and 2.8 to include consideration of the need for secure and covered parking for mobility scooters in appropriate uses. Consider an appropriate level of provision through reference to other local authorities.</p> <p>Proposed change to the SPD:</p> <ul style="list-style-type: none"> • Add new para to section for Parking for People with Disabilities (paras 2.7 and 2.8) • Identify an appropriate standard.
	<p>There is no cycle parking standard for outdoor sports facilities. Cycling should be encouraged for these uses.</p>	<p>Agreed – see above</p>
	<p>In the experience of our development management colleagues, car parking widths of 2.3 metres are not advisable considering the size of modern cars. If this is to be included, there should be clear guidance as to when this minimum standard would be acceptable.</p>	<p>With regards to the bay widths, the supporting evidence shows that across CMK there is currently a range of width of parking bays. Notwithstanding this, however, the reference to changes to bay widths is to be deleted from the SPD. A decision has now been taken not to proceed with the rearrangement of bay widths in CMK.</p>

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Senior Planning Officer MKC Development Management	<p>Para 1.25 “Where a reduction in parking is likely to transfer parking to other locations, development would be considered inappropriate” – This may cause confusion in town centre locations where the availability of off-site car parks is often considered when assessing the acceptability of parking proposals.</p>	<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>This sentence will be reconsidered – the potential impact on town centre locations is acknowledged.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Amend final sentence of para 1.25 to read: “Where a reduction in parking is likely to transfer parking to inappropriate locations, development would be considered unacceptable.”
	<p>Para 2.4 Typo ‘standard’.</p> <p>This paragraph should confirm what percentage of electric vehicle charging points is expected. Or alternatively make reference to Section 7.</p>	<p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Correct typo • Include reference to Section 7 and Table 4 providing standards for electric vehicles.
	<p>Para 2.16 It would be helpful if it could be made clear whether the vehicle parking standards represent <i>minimum</i> standards.</p>	<p>The standards are the <u>expected</u> standards - ie neither maximum nor minimum.</p>
	<p>Table 1</p> <p>1. Use Class A3, A4, A5 – This has previously been based on gross floor area, but now there is an additional requirement for staff numbers. This will be difficult to apply at planning application stage as staff numbers are not usually known and for these particular A Class uses is likely to change. Suggest standard is based on floorspace only.</p>	<p>Agreed – it will be difficult to have access to reliable likely staff numbers at the planning application stage to be able to calculate the staff parking requirements.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Return to a parking requirement based on the floorspace

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	<p>2. Use Class B1(a) – Is it intentional that a HGV space would be required on office developments on constrained sites (e.g. CMK)? If so, this may not be feasible.</p>	<p>The CMK Business Neighbourhood Plan parking standards extend the requirement for 1 HGV per 500 sqm for development over 300 sqm, otherwise the standard remains the same from that currently in operation.</p> <p>The need for an HGV space in connection with a development proposal would be discussed with the applicant.</p>
	<p>3. Use Class C3 – No distinction between 2 bed houses and flats. This conflicts with the rationale which suggests that less provision is required for residents living in flats.</p>	<p>Noted. It is proposed to create a new category for 2 bed flats which would reduce the parking requirement for them. The proposed change reflects the Census findings that there is lower car ownership in flats but balances that against the experience in Milton Keynes that many 2 bed flats are occupied often by families or 2 professionals each having a car.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Table 1, C3 Residential Dwellings: add a new row under 1 bed dwellings called “2 bedroom flats”. The standards to be applied to the 2 bed flats are: <ul style="list-style-type: none"> ○ Zone 1 = 1 space ○ Zone 2 = 1 space +0.33 unallocated ○ Zone 3 = 1 space +0.75 unallocated ○ Zone 4 = 1 space + 0.75 unallocated

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	<p>The requirement for 2 allocated parking spaces for flats will have a significant impact on the size of parking courts, particularly if tandem parking is not permitted, which in turn will impact on the amount of development that can be achieved on site and will likely increase the amount of blank frontage to the street. This should be acknowledged in Section 4 Parking Courts.</p>	<p>The above change will help to alleviate this concern.</p>
	<p>Use Class C4 – There does not appear to be any unallocated parking requirement. Is this correct?</p>	<p>Given the nature of households occupying HIMOs it is considered that there is not the same requirement for unallocated parking as is the case with C3 residential developments. The likelihood is that any HiMO applications will be change of use in which case the highway conditions will be able to be assessed as built.</p>
	<p>Planning applications/pre-application discussions in CMK since the adoption of the Neighbourhood Plan suggest that tightly constrained sites/viability make it difficult to achieve the standards set out in the Neighbourhood Plan. Should reference be made to this eventuality and the factors that could be considered when assessing the acceptability of parking proposals?</p>	<p>Paras 1.16, 1.17 and 1.24 provide some flexibility in the delivery of parking spaces to meet the standards. In the case of CMK however, the CMK Business Neighbourhood Plan in policy CMKAP T4 sets out the circumstances and considerations that will be used when assessing the acceptability of parking proposals in new developments. The Plan takes precedence over the SPD.</p>
	<p>The standards set out in the CMK Neighbourhood Plan are maximum standards. Are the new standards also maximum? If they are minimum standards the two need to be in line (the neighbourhood plan would be given more weight).</p>	<p>It is correct that the CMK Business Neighbourhood Plan sets maximum standards for CMK and Campbell Park. As these standards are set out in an approved Plan this is the approach that must be taken. Other than for CMK and Campbell Park (where the CMK business Neighbourhood Plan policies apply) the standards set out the expected number of parking spaces for each land use type.</p>

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	<p>Table 2 Use Class A and B – cycle parking standards are based on floorspace <i>or</i> employees. If these calculations present different requirements which should be followed?</p>	<p>Given the difficulty noted above of predicting at planning application stage the number of employees likely to arise from a development it is recommended that the standards be amended to just be based on floorspace.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Table 2, Cycle Parking for use classes A and B – delete reference to provision per number of Full Time employees. •
	<p>Para 4.16 The provision of additional unallocated parking spaces for tandem spaces at a rate of 1 space per two dwellings (in addition to the standard unallocated parking requirement) is likely to have a significant impact on streetscenes and will be difficult to achieve where openings are provided to individual driveways.</p>	<p>A balance has to be struck between ensuring that adequate parking is provided to meet the demands arising from new developments and the need to ensure and allow high quality design.</p> <p>It is acknowledged that some of the revised residential standards will present challenges for designers in creating attractive and varied layouts, however, the standards are considered to be appropriate based on experience in Milton Keynes and when set against those used by other local authorities. The impact of the Parking Standards SPD will be kept under review as new developments implementing the new standards come forward.</p>
	<p>Further guidance should be provided on what constitutes a 'convenient' on-street parking space.</p>	<p>To define 'convenient' it is suggested that the SPD should use the guidance para 3.10.1 of the Residential Design Guide SPD which requires a provision of on street parking within 15m from the front of a property where tandem parking is provided.</p>

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	<p>Para 4.19 Rear parking courts should be acknowledged as an acceptable form of parking for apartments.</p> <p>Para 4.26 The restrictions to the size of parking courts potentially conflicts with the requirements under Table 2 for 2 allocated parking spaces for flats.</p> <p>Para 4.36 It would be helpful if design guidance is provided for front parking courts. If it is the same as rear parking courts please state so.</p>	<p>Proposed change to SPD:</p> <ul style="list-style-type: none"> Amend Footnote 3 in para 4.16 to state that for the additional space to be considered 'convenient' it should be within 15m from the front of a property where tandem parking is provided. <p>Para 4.19 accepts that small private and secure rear parking courts may be acceptable.</p> <p>The above change to the parking standard for 2 bed should go some way to helping to alleviate this concern.</p> <p>Para 4.36 and the accompanying Figure 4 provides some guidance for front parking courts.</p>
	<p>Para 6.1 Dedicated Motorcycle parking spaces are not typically requested for residential developments. It is not clear how this can be applied.</p>	<p>Noted. Amend Table 3 (Parking Standards for Powered 2 wheelers) to delete the reference to residential developments.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> Amend Table 3 (Parking Standards for Powered Two Wheelers) to delete the housing references and just use the GFA figures.

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	<p>Para 6.6 Typo 'efficient'.</p>	<p>Noted, will amend</p>
	<p>Para 6.7 Dedicated electric vehicle parking spaces are not currently requested for residential developments. It is not clear how this can be applied.</p>	<p>Clarify that Table 4 (Parking Standards for Electric Vehicles) applies to non-residential developments.</p> <p>Given the Council's bid to the OLEV Go Ultra Low City Scheme, it would be relevant to add some additional detail to Section 2 of the SPD (Parking for Electric Vehicles) in order to raise awareness of the Council's commitment to this initiative.</p> <p>Proposed changes to the SPD:</p> <ul style="list-style-type: none"> • Amend title of Table 4 to read "Parking Standards for Electric Vehicles in non-residential developments" . • It is recommended that a new paragraph is added after 2.3 to read: "The Council has recently submitted a funding bid to the OLEV Go Ultra Low City Scheme with the intention of dramatically increasing the numbers of ultra-low emissions vehicles on the city's roads. Measures in the bid include the Milton Keynes Promise that will guarantee the provision of a charge post near to the homes of owners who do not have off-street parking. The Promise will initially see delivery of 200 night time charging points and work is underway to find a suitable charging post design."

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	<p>Para 6.13 Typo 'General', 'Distribution', 'development' and 'differing'.</p> <p>Appendix A Zone 3 should be extended to include all parts of the Western Expansion Area (Area 11 not currently included) and the Strategic Land Allocation (Fairfield Land and Church Farm not included).</p> <p>Additional Comments Where direct access cannot be taken from the street and therefore rear parking is the only solution, one option that is becoming more frequently used and has been quite successful in more recent layouts is the provision of rear mews streets, rather than parking courts. It would be helpful if this option together with additional design guidance could be included in the SPD.</p>	<p>Noted, will amend</p> <p>Noted – the Zone map needs to be updated and amended to show the allocated development sites within Zone 3.</p> <p>Noted, additional drawings are to be added to the Design Guide section of the SPD to provide additional suggestions for parking solutions.</p>
Regulatory Advice & Licensing Team Milton Keynes Council	<p>I think reducing the width of parking spaces would be a mistake and hope you don't do this.</p> <p>Individuals will struggle to get out of their cars if you reduce the widths anymore and you will increase the likelihood of damage to adjacent vehicle from doors opening.</p> <p>Sadly we live in a world when bigger is better be that obesity or MPV/SUVs and so its asking for trouble especially given how much we already charge people to visit CMK. We have to accept that 'standard width' spaces are now in some ways a minimum standard to work to.</p>	<p>With regards to the bay widths, the supporting evidence shows that across CMK there is currently a range of width of parking bays. Notwithstanding this, however, the reference to changes to bay widths is to be deleted from the SPD.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Delete Footnote 4 in para 6.9 on page 30 of the draft SPD. • Delete “normally” from the first sentence of paragraph 6.9

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Senior Planner (Forward Plans) Aylesbury Vale District Council	What evidence is there sitting behind the Draft SPD that justifies the proposed standards are appropriate? For example only two spaces per dwelling on plot for 4-bed dwellings in Zones 2 and 3. What evidence is there that people living in 4-bed dwellings will only need two cars in Milton Keynes Central areas?	Data from Census 2011 was obtained and analysed which included car ownership for differing household types and locations. Data showed that larger dwellings have a higher car ownership level than smaller. The data does show that car ownership in some central areas (Campbell Park, Woughton and Linford South) has decreased per household. The standards have been benchmarked against other similar authorities.
	How has viability (NPPF Paras 173 and 153) been considered in drawing up the standards to be applied? More car parking can be more viability burdens on development.	The essence of the SPD is to encourage development which is not only financially viable but is also viable from a transport / highways perspective. If insufficient parking is provided, the development may leave a legacy of dealing with the issues this causes. Within the SPD there is scope to justify a level of parking which varies from the values within Table 1.
	Why is it considered an SPD rather than an Appendix in a Local Plan been considered the best place to have the standards? A Local Plan would give the standards more force.	Including standards in an SPD rather than the emerging Plan:Mk is advantageous as it allows for easier and quicker review of the standards outside of the local plan review timetable. It is also quicker to get the SPD in place rather than use the local plan process.

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Capital Programme Director, Capital and Infrastructure, MKC	<p>The existing parking standards are already more generous than those in other local authorities (as noted in the Rationale column in the draft SPD). The Basic Needs funding mechanisms for new and extended schools does not take account of local characteristics such as the higher average levels of car ownership experienced in Milton Keynes and so it does not fund the car parking required by the standards. This in turn then requires a contribution from capital funds making that money unavailable to other projects. The proposed increase in the amount of drop off parking will therefore compound this situation. The proposed increase in the drop-off parking for secondary schools in Zone 3 would, for example represent roughly a 20% increase from the existing standards. For the majority of the day, drop-off spaces are left unused as they are primarily needed at the start and end of day peaks. This is a waste of valuable land that could be used more effectively to benefit the school.</p>	<p>Section 1 of the SPD, especially paragraphs 1.15 – 1.20 accepts that there is a need to reflect local circumstances and the requirements of individual applications. The inclusion in a Travel Plan of a range of measures to encourage less driving to school and more walking, cycling and use of public transport.</p> <p>That aside, the rationale for the proposed standards in the draft SPD is clear that the existing and proposed drop off parking requirements are generous in comparison to other local authorities and to increase them further would also bring them into conflict with the Council’s LTP3 performance indicator to reduce the percentage of journeys to school by car. It is therefore proposed to amend the draft SPD to retain the existing parking standards for schools.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • For all schools amend Table 1 to retain the existing parking standards for schools.

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	<p>There seems to be a conflict between the need for schools and other capital projects to meet the sustainable construction requirements of Policy D4 and contribute to carbon off setting (as well as taking account of the current need to reduce childhood obesity) and the encouragement given to parents to drive their children to school through the availability of parking. Travel Plans, which encourage walking and cycling to school, accompany planning applications but the availability of car parking does little to encourage alternative modes of transport to and from school.</p>	<p>Travel Plans are submitted alongside planning applications for schools and have the potential to identify and deliver a range of measures to reduce car-borne journeys. It is recommended that a note be added to Table 1 for schools to highlight that in certain circumstances and in connection with an acceptable Travel Plan, a relaxation of the standards might be considered.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Add additional text for the schools Parking Standards to note that a relaxation of the standards might be considered acceptable subject to local circumstances and a range of car journey reducing measures in an agreed Travel Plan.
	<p>Schools projects tend to either involve extensions to existing schools many of which are on constrained sites or new schools in the expansion areas, where the allocated site area was designed to accommodate a 2 FE school but which now is having to deliver a 3 FE school, making it difficult to accommodate the required amount of car parking as well as other provisions including outdoor play space.</p>	<p>Noted, the proposed changes identified above will assist in addressing these issues.</p>

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Other organisations, developers and individuals		
<p>Turley on behalf of the owners of the centre:mk Shopping Building, Site E2.4, Site E1.1 and the Food Centre</p>	<p>Increase in parking requirements for Class A3, A4 and A5 uses. Our concerns specifically relate to the designated 'Zone 1 - CMK'. In respect of parking requirements for A3 uses, we consider that the proposed increase in parking requirements is significant. We consider this will have significant detrimental viability impacts on any proposals seeking to locate Class A3, A4 and A5 uses within the Centre.</p> <p>There is a finite quantity of parking provision available within the Centre MK, which has not been acknowledged in the proposed SPD. There is no mention of the forthcoming Multi Storey Car Park at site E2.4 and how this increase in parking provision is factored into the requirements for additional parking in accordance with new Class A3, A4 and A5 uses within the Centre. The increase in parking requirements should be accompanied by a detailed assessment of how the additional parking can be accommodated within Zone 1, alongside current and forthcoming parking provision.</p> <p>Paragraph 1.24 of the document acknowledges that "mixed use leisure / retail sites for example may justify a reduction in parking than would be the case if the standards for individual uses are aggregated". We consider that the proposed standard fails to acknowledge the extent of trip linking within CMK with visitors</p>	<p>The CMK Business Neighbourhood Plan sets the parking standards for CMK and Campbell Park in Table 3. The Plan, as a part of the Development Plan, carries more weight than the SPD and so the parking standards in the Plan are the ones that should be applied.</p> <p>There are, however, a few points which require some consideration in terms of how the Plan's parking standards are used and reflected in the SPD. Firstly, the Plan's standards are expressed as the maximum standards (Policy CMKAP T4 (a)) whereas the other standards in the SPD are not. Secondly, the Plan's car parking standards refer, in part, to the 2005 Parking Standards SPG which will be replaced when the new SPD is adopted. Thirdly, the new SPD includes standards for more uses than the Plan does (eg the SPD provides for Use Classes A4 and A5, as well as providing parking standards for HiMOs).</p> <p>Recommendation: It is recommended that the parking standards for Zone 1 continue to be shown in the Parking Standards SPD and are aligned with those in the CMK Business Neighbourhood Plan as closely as possible.</p> <p>New text needs to be included to clarify that the SPD is a guide and that for CMK and Campbell Park, the starting point must be Table 3 in the Business Neighbourhood Plan. The SPD standards can then</p>

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	<p>for the Class A1 uses. Moreover, differing opening hours of units within CMK should be acknowledged as a factor in these requirements. The spaces freed by visitors to the Class A1 uses can be later occupied by those visiting for Class A3/A4/A5 purposes, as occurs at present.</p> <p>Beyond the specific parking space standards, the document acknowledges the need to reflect local circumstances and the requirements of individual developments when assessing applications, stating that “where an applicant chooses to provide more or less parking than the standard, this would need to be subject to a rigorous assessment.” This rigorous assessment is more specifically detailed as a requirement for Transport Statements and Assessments, with contributions towards the provision of high quality public transport expected to complement any agreed reduction in parking provision. This approach does not directly reiterate the approach detailed in the CMK Alliance Plan as listed under part (c) of Policy CMKAP T4. Additionally, it also removes the flexibilities provided within part (d) without adequate justification. As such, we seek for this flexibility applied within the Centre to be retained.</p> <p>Summary</p>	<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>be used as guidance for any developments which are not covered by the Plan’s standards. The additional text should also make it clear that any parking standards included in other made Neighbourhood Plans would receive more weight than the SPD and that this would be addressed in any decision making process. This would cover any differing approaches in neighbourhood plans other than the CMK Business Neighbourhood Plan.</p> <p>The SPD will cross-refer to CMKAP Policy T4 and a copy of that policy will be included as an appendix.</p> <p>Campbell Park will be moved into Zone 1.</p> <p>Proposed changes to the SPD:</p> <ul style="list-style-type: none"> • Amend Para 1.28 to move Campbell Park into Zone 1 • Amend Table 1 to replace the Zone 1 parking standards with those from the CMK Business Neighbourhood Plan • Include additional text in Sections 1 and 2 to explain the status and role of the parking standards in the CMK Business Neighbourhood Plan • Include a copy of the CMK Business Neighbourhood Plan Table 3 (Parking Standards) and Policy CMKAP T4 in an

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	<p>We consider the proposed alterations to the parking standards above will (as expressed as a concern within the consultation document) create perverse incentives for development within these use classes to locate away from CMK, where the standards are lower.</p> <p>We understand this to be contrary to the aims of Core Strategy Policy CS7, which seeks for CMK to “<i>achieve growing visitor numbers from outside the city to further enhance CMK’s status as a regional and national destination for shopping, culture and leisure</i>”.</p> <p>The draft Parking Standards SPD should also align with the approach of the CMK Alliance Plan 2026 in allowing sufficient flexibilities to accommodate this.</p>	<p>appendix to the SPD for ease of use.</p> <p>The SPD at para 1.24 explains that mixed-use leisure/retail sites might justify a reduction in parking relative to if the requirements for the individual uses were aggregated. This acknowledges that flexibility can be applied to such situations where trip linking can reduce the overall demand for parking space. As the paragraph acknowledges, however, the implications of trip linking associated with mixed use development is not clear cut as it can result in visitors staying longer to enjoy the different uses (eg shopping giving way to a visit to the theatre or an evening meal) which can reduce the turnover of parking spaces. In CMK and Campbell Park Policy CMKAP T4 of the CMK Business Neighbourhood Plan sets out the approach to flexibility in the application of the parking standards in these areas.</p> <p>Linking to the current consultation on the CMK Parking and Transport Strategy more explanatory text could be added to the SPD to provide more of the context for CMK, but consideration of existing parking availability and MSCPs etc would be a consideration alongside Development Plan policies in the determination of any planning applications.</p>

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Chris O'Connor Director Bovis Homes Ltd	Maintain the current differentiation between 2 bed flats and houses as specified in the 2009 standards.	<p>Noted. It is proposed to create a new category for 2 bed flats which would reduce the parking requirement for them. The proposed change reflects the Census findings that there is lower car ownership in flats but balances that against the experience in Milton Keynes that many 2 bed flats are occupied often by families or 2 professionals each having a car.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Table 1, C3 Residential Dwellings: add a new row under 1 bed dwellings called “2 bedroom flats”. The standards to be applied to the 2 bed flats are: <ul style="list-style-type: none"> ○ Zone 1 = 1 space ○ Zone 2 = 1 space +0.33 unallocated ○ Zone 3 = 1 space +0.75 unallocated ○ Zone 4 = 1 space + 0.75 unallocated
	Presumption against Tandem Parking in 4.16 and 4.26 is deleted	<p>A balance has to be struck between ensuring that adequate parking is provided to meet the demands arising from new developments and the need to ensure and allow high quality design.</p> <p>A survey of residents did demonstrate the relative unpopularity of tandem parking. That and the experience in a number of recent developments has led to the expression in para 4.16 of the presumption against tandem parking. No change to that is proposed.</p>

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	Build in flexibility to the parking standards before any justification is required under para 1.17	<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>Para 1.15 acknowledges the need to reflect local circumstances and the requirements of individual developments when assessing applications. To add further weight to this the paragraph could start by making reference to the NPPF para 10 which states that “Plans and decisions need to take local circumstances into account so that they respond to different opportunities for achieving sustainable development in different areas”</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Amend para 1.15 to refer to NPPF para 10.
	Clarify the requirement for charging points to exclude residential areas.	<p>Clarify that Table 4 (Parking Standards for Electric Vehicles) applies to non-residential developments.</p> <p>Proposed change to the SPD:</p> <ul style="list-style-type: none"> • Amend title of Table 4 to read “Parking Standards for Electric Vehicles in non-residential developments” . <p>The provision of an outdoor electric supply for off-street and on-street residential parking spaces is part of the Milton Keynes’ Prospectus bid for the Go Ultra Low Cities scheme.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Refer in Section 7 (Electric Vehicles) to the Council’s bid and its aspirations for improved access to EV charging points in the MKC bid.

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	Allow the provision of oversized garages to count towards the parking provision.	Garages, whether over-sized or not do not provide a guaranteed parking space which can result in additional pressure for on-street parking in inappropriate locations. For this reason it is not proposed to amend the SPD to allow garages to count as parking spaces.
	Consider the conflict between the proposed parking standards and the densities, house typologies and parking strategies set out in the approved Design Codes.	<p>Agreed – Section One of the SPD needs to be amended to include reference to the impact fo the new Parking Standards on existing planning permissions and consents. ‘</p> <p>Proposed change to SPD: In Section 1 insert a new Section titles “Relationship of SPD to Existing Planning Consents, Briefs and Design Codes “ after the section called “Relationship with Local and National Policy”</p> <ol style="list-style-type: none"> 1. Extant planning permissions and reserved matters approved prior to the adoption of this SPD, can be implemented as approved. The council would however always entertain re-submitted applications that accord more closely with the principles and guidance contained within this new SPD. 2. For some sites, planning permission has been granted subject to legal agreements and planning conditions which require developers to submit future reserved matters applications in accordance with approved pre-existing design codes. Where applications for reserved matters come forward in these areas, the Council will expect developers to follow the

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		<p>requirement of those pre-existing design codes but acknowledge that in submitting reserved matters applications, they may wish to incorporate the principles and guidance contained in this new SPD. Where the reserved matters application is supportive of the content of the SPD, the Council will not refuse the application solely on the basis that it varies from any of the pre-existing approved design codes, especially when the application is seeking to incorporate the principles contained in this SPD.</p> <p>3. Planning Applications, Reserved Matters Applications (not linked to a legal agreement or conditional upon adherence to a design code) and other forms of design guidance (e.g. design codes) submitted after the adoption of this SPD will need to have been prepared, wherever possible and/or appropriate, in accordance with the content of this SPD. All planning applications and other forms of design guidance submitted after the adoption of this SPD will be considered against the content of this SPD.</p> <p>4. The above does not negate the need for formal consents or variations to existing legal agreements.”</p>

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Alan Francis	I support flexibility being introduced by dropping minimum requirement. The re-introduction of maximum levels for car parking would aid sustainability.	<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>The government removed the requirement for local authorities to set maximum parking standards in 2011. In a Written Statement published March 2015 the government amended national planning policy to further support the provision of car parking spaces. Parking standards are covered in paragraph 39 of the National Planning Policy Framework. The following text now needs to be read alongside that paragraph: “Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network.”</p> <p>The parking standards in the draft SPD are therefore the expected standards for developments. They are not a maximum, other than for those in CMK and Campbell Park which are provided by the CMK Business Neighbourhood Plan.</p>
	<p>Table 1: C3 Zone 3 2 bedrooms should be 1.5 + 0.25 unallocated Reason: car ownership for 2 bed dwellings will be less than that for 3 bed dwellings. The note points out that the 2011 census indicating that 41.5% of residents living in flats do not have access to a car. Many 2 bed dwellings will be flats.</p>	<p>It is proposed to create a new category for 2 bed flats which will help to reflect the Census findings that there is lower car ownership in flats. With that change, it is considered appropriate to maintain the 2 spaces plus 0.25 unallocated for 2 bedroom houses in Zone 3.</p>

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	C4 HIMO Standard should be 0.5 for all zones Reason: car ownership for HIMO residents will be less than that for non-HIMO dwellings.	The higher standard for Zone B reflects the relative distance of this Zone from the city centre as well as the fact that properties in this Zone are likely to be larger and therefore capable of generating more cars than would typically be seen in Zone A.
	D1c 8-11 years Zone C This should be lower than 1 per 6, say 1 per 9 as for zones 1 and 2. This is compatible with modal shift called for in LTP3.	It is proposed to remove the separate rows for Pupils aged 4-7 years and 8-11 years as these are the same as the standard for Pupils aged 4-11 years. It is acknowledged that the standards for drop off spaces are generous in comparison to other local authorities, but the standards shown are compatible with LTP3.
	Section 4 4.3 Garages should be included as counting as parking spaces.	Occupancy of garages is low and it is not considered desirable for them to count as a parking space as, if they are used for purposes other than parking, this increases pressure on on-street parking spaces.
Adam Kindred Planner CBRE Ltd Planning Representing various investment portfolios	It is important that parking standards within town centre locations allow flexibility to take account of site-specific circumstances. With this in mind, we welcome the Council's approach at paragraph 1.15 where it states that 'there is a need to reflect local circumstances and the requirements of individual developments when assessing applications.' We would welcome further commentary within the parking standards for the need for planning judgement to be exercised to ensure that prescriptive planning standards do not unnecessarily prevent sites, specifically those in a town centre, from coming forward.	The approach to flexibility in the application of the parking standards is particularly set out in paras 1.15 through to 1.24. For developments in CMK and Campbell Park (Zone 1) the standards are expressed as the maximum number of parking spaces to be provided and regard must also be had in these locations to the requirements of the CMK Business Neighbourhood Plan Policy CMKAP T4.

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	<p>The evidence clearly points to a clear difference in car ownership levels between those living in ‘flatted developments’ compared to those living in other accommodation types. In many respects such a conclusion is unsurprising given that flatted accommodation is perhaps more commonly associated with town centre development and, in turn, town centres are more accessible as locations. Such a trend is only anticipated to increase with the current trend towards fewer people learning to drive.</p> <p>As currently drafted, such a reality is not communicated through the parking standards with residential standards based on the number of bedrooms, ‘hiding’ the different level of car ownership that may come from different housing types. As currently drafted, the parking standards propose almost the same level of parking standards for a one bedroom unit whether you are located in the centre of Milton Keynes Town Centre (Zone 1) or a greenfield site on the edge of Milton Keynes (Zone 4).</p>	<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>Noted. It is proposed to create a new category for 2 bed flats which would reduce the parking requirement for them. The proposed change reflects the Census findings that there is lower car ownership in flats but balances that against the experience in Milton Keynes that many 2 bed flats are occupied often by families or 2 professionals each having a car.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Table 1, C3 Residential Dwellings: add a new row under 1 bed dwellings called “2 bedroom flats”. The standards to be applied to the 2 bed flats are: <ul style="list-style-type: none"> ○ Zone 1 = 1 space ○ Zone 2 = 1 space +0.33 unallocated ○ Zone 3 = 1 space +0.75 unallocated ○ Zone 4 = 1 space + 0.75 unallocated
<p>Will Riley Associate David Lock Associates For AXA/Baytree</p>	<p>The Council set out at Paragraph 1.5 & 1.6 that the draft SPD should be seen in the context of the NPPF, however we are unaware that any changes to the NPPF are being made and therefore it is suggested that the text in Para 1.6 is changed and that this SPD is prepared in line the NPPF as it is written. To do otherwise would appear unsound.</p> <p>It is further noted that the NPPF should be read as a whole (Paragraph 6) to achieve its goal of delivering sustainable (economic) development. As such, parking standards should be</p>	<p>Agreed –amend the SPD to clarify the ‘change’ to the NPPF in para 1.6. This relates to the Written Statement from the Minister in March 2015 which requires the wording included in para 1.6 to be read alongside para 39 of the NPPF.</p> <p>Proposed change to SPD: Amend paras 1.5 and 1.6 to clarify that the ‘change’ to the NPPF in para 1.6. relates to the Written Statement from the then Minister in March 2015 which requires the wording included in</p>

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	seen against, and be judged against their interaction with the three limbs of sustainable development (Economic, Social and Environmental). Paragraph 9 of the NPPF illustrates these interactions and sets out the approach the Council should take in framing this document.	para 1.6 to be read alongside para 39 of the NPPF.
	The Council should adopt a more flexible and a pragmatic approach that is sensitive to the differentiated qualities, characteristics and connectivity of different parts of Milton Keynes. Such an approach would better align with the NPPF and would help deliver quicker decisions with less officer time leading to greater levels of development.	The zonal approach taken on the SPD takes account of the characteristics of the location of the development site and is consistent with other local authorities. The approach to flexibility in the application of the parking standards is particularly set out in paras 1.15 through to 1.24.
	Whilst the zonal approach outlined in Paragraphs 1.26 to 1.31 is generally supported, the zonal map is the same as that used within the 2005 SPD. In the 11 years since that document was prepared there have been significant changes in the shape of Milton Keynes and the provision of public transport services. Accordingly it is only logical that the zonal plan is updated accordingly as to do otherwise would potentially lead to inappropriate standards being applied which do not accord with the guidance contained within Para 39 of the NPPF. The plan itself is also presented unclearly and should be updated.	The Zone Map plan needs to be updated to clearly show the location of the major development areas - for example not all of the area of the WEA and the SLA are currently included in Zone 3 but fall, in part into Zone 4. Proposed change to the SPD: <ul style="list-style-type: none"> • Amend Appendix A – Maps of Parking Standards Zones to include all of the WEA and the SLA in Zone 3.

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	<p>The new SPD sees an increase in the standard of HGV parking being required from 1 per 500m² to 1 per 300m² and a reduction in the standard of cycle parking required. We raise no issue with the reduction in cycle parking but consider that the increase in the HGV parking standard is unwarranted, without any empirical foundation and would fail to support the overall goals of delivering sustainable development as required by the NPPF.</p>	<p>The HGV parking requirement is the same as that in the current parking standards namely 1 HGV space per 500sqm for developments over 300 sqm.</p>
<p>David Lock Associates For Inter MK (MK stadium owners)</p>	<p>The parking requirements proposed for A Use Classes in Zone 3 are too high and they do not appear to be supported by empirical evidence. An overprovision of parking spaces could have a negative impact on the character of the urban realm by creating a car dominated environment – a result that is counter to the Council’s aspiration to create great and sustainable neighbourhoods. Our experience of parking standards employed by other local authorities, in districts with comparable ONS 2001 vs 2011 Census - Car Ownership data (see table overleaf), also demonstrates to us that the figures being proposed by the Milton Keynes Council do not reflect the popularity of owning a car by residents of Milton Keynes.</p> <p>Based on past experience we believe the cycle parking standards for Use Class A are extremely high and lack a robust evidence base. The proposed standards would require a retail unit of 1,000 m² in Zone 3 to provide 10 visitor or casual parking spaces and 5 employee cycle spaces. The excessive cycle parking would result in an ‘untidy’ public realm and would not further promote cycling as a mode of transportation.</p>	<p>The parking standards of a number of local authorities having characteristics that can be considered similar to Milton Keynes have been examined as background to the preparation of the SPD.</p> <p>The comparison shows that Milton Keynes’ non-residential parking standards equate to very similar numbers of parking spaces as many of the other authorities for office and retail uses in outer locations whilst the standards for central locations is on the mid-range of the spectrum. The standard for A3 uses is the lowest of all authorities in both central and outer locations. On the basis of this information no change is proposed.</p> <p>The existing standards are comparable to those used by the local authorities against which Milton Keynes has been compared. Flexibility for non-residential uses in Zones 3 and 4 is introduced by para 3.4 which recognises that, if site specific proposals and conditions justify it, the Council may consider a departure from the non-residential standards for these zones.</p>

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	<p>The consultation document proposes to continue the previously adopted zonal approach. Appendix A identifies the Parking Standard Zones. Whilst we do not object to the zonal approach, the zonal locations identified in Appendix A have not been updated since the previously adopted version of this document (January 2005) with the map being dated 2004. Milton Keynes has seen significant change and expansion over the past 11 years and the Parking Standards Zones proposed do not take these into consideration, nor the proposed future changes in the District. For example, the built extents of Oakridge Park are located in Zone 4 – Rural Areas and parts of the proposed western expansion area are located in Zone 4, with parts in Zone 3 also. This may lead to inappropriate parking provision across these contexts.</p>	<p>The Zone Map plan needs to be updated to clearly show the location of the major development areas - for example not all of the area of the WEA and the SLA are currently included in Zone 3 but fall, in part into Zone 4.</p> <p>Proposed change to the SPD: Amend Appendix A – Maps of Parking Standards Zones to include all of the WEA and the SLA in Zone 3.</p>
	<p>Within the zonal map, Stadium:MK and MK1 Retail and Leisure areas are located in Zone 3. Whilst this may have been an appropriate allocation in 2004, in the 11 years which have followed, an international sporting venue has been developed including supporting facilities. Therefore, the context of the area has significantly changed and is much more akin to Zone 2 areas or Central Milton Keynes. In addition, the connectivity to this area has been significantly improved, for example there are new and improved Redways and public transport. The growth within the area has led to the successful accommodation of the Rugby World Cup, which has attracted in excess of 30,000 people to the Stadium on an evening whilst the retail units are still operating as</p>	<p>Having reviewed public transport accessibility of MK1/Stadium MK, it is clear that the area is well served by buses but this was not a contributory factor in hosting the RWC, because local buses were diverted away from the Stadium.</p> <p>The Stadium area is served by bus services to a wider range of destinations than some of the centre currently in Zone 2, such as Westcroft or Stony Stratford (although in these areas, their close proximity to a large local population and the wide range of facilities they provide is equally as important as they are accessible by other modes of transport, particularly walking and cycling.)</p>

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	<p>normal. The Council has been praised for the smooth running of the event and absence of congestion, utilising the current highway and parking configuration in the area. Therefore, with capacity-crowd events already occurring successfully within the area, if the proposed Zone 3 standards were to be applied, this would lead to a distinct oversupply of car parking spaces in this context. We believe it is inappropriate for the Stadium to be subject to the same standards as areas such as Broughton, Greenleys or Woburn Sands which differ significantly in nature and thereby are not comparable</p>	<p>On the basis of the public transport accessibility it is recommended that the MK1/Stadium be moved in to Zone 2.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Revise the Zone maps in Appendix A to include the MK1/Stadium area in Zone 2 and update the text in para 1.28 to reflect this.
	<p>Furthermore, the document does not make reference to parts of Milton Keynes which are destinations, such as Stadium:MK and MK1 Shopping and Leisure Park, or acknowledge the fact that there is ample shared parking. On non-match days there are approximately 1,600 spaces designated for visitors. In situations such as this, where the applicant can demonstrate there is sufficient shared car parking, the revised SPD allow for the provision of additional floorspace with reduced car parking requirements. The document also makes no acknowledgement of the potential for linked-trips to an area, or the potential for multi occupancy developments. The proposed parking standards should be more flexible and take account of these scenarios, to allow these considerations to be included when new applications are assessed.</p>	<p>Paras 1.15 and 1.24 of the SPD do acknowledge both the need to reflect local circumstances and the requirements of individual developments as well as recognising that mixed-use retail/leisure developments, for example, may justify a reduction in parking, as a result of a certain amount of trip linking.</p> <p>No change proposed.</p>

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	<p>Paragraphs 1.16 and 1.17 of this document seek to address the issue of deviation from the proposed parking standard. However, we believe that these are overly restrictive and are likely to create a significant amount of additional unnecessary work for Council Officers, in order to justify a minor variation. We believe that the Council should adopt a more flexible and a pragmatic approach that is sensitive to the differentiated qualities, characteristics and connectivity of different parts of Milton Keynes.</p> <p>Additionally, the document lacks clarity regarding the submission of reserved matters applications which refer to outline consent approved prior to the new standards coming into force. There should be a specific reference which confirms that the new parking standards will not apply, or be a material consideration, to reserved matters applications where the outline planning permission has already been granted. Without this clarification there is a risk that a number of developments may become financially unviable or lead to a deviation from the extant outline planning consent.</p>	<p>The zonal approach taken on the SPD takes account of the characteristics of the location of the development site and is consistent with other local authorities.</p> <p>The approach to flexibility in the application of the parking standards is particularly set out in paras 1.15 through to 1.24.</p> <p>Agreed – Section One of the SPD needs to be amended to include reference to the relationship between existing planning permissions and consents and the new SPD – see Proposed Change to SPD on pages 36 and 37 above.</p>
Hampton Brook	We object to the proposed changes in the Consultation Draft - Parking Standards SPD dated August 2015. The proposed changes will result development in CMK becoming unviable.	<p>The standards for CMK are set out in the CMK Business Neighbourhood Plan, Table 3 and in CMKAP Policy T4. Unlike the rest of the parking standards for Zones 2,3 and 4, the standards for CMK and Campbell Park are the maximum number of spaces to be provided.</p> <p>The made Business Neighbourhood Plan forms part of the Development Plan for CMK and Campbell Park and therefore carries greater weight in planning policy terms than the SPD would.</p>

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	<p>Section 2.16 Table 1 sets out the Vehicle Parking Standards based on use class and zones. The proposed changes to use class B1 for Zone 1 seek to increase the parking provision by 40% from 1/70m² to 1/50m² <u>This will be impracticable and make future development of CMK unviable, the changes will create a barrier to inward investment and regeneration within CMK.</u></p> <p>In support of this statement, it is reasonable to consider the how the standards might affect new development within CMK. If the proposed standards were to be applied to the Pinnacle building, the following would apply:</p> <ul style="list-style-type: none"> • Pinnacle floor area GEA 31,640m² • Current standards @ 1/70 = 452 vehicle parking spaces would be required • Proposed standard @ 1/50 = 633 vehicle parking spaces required • Increased requirement of 181 vehicle parking spaces. <p>To create a building with active frontage, with colonnades etc that was accessible from street level, Pinnacle provided parking spaces on plot in the form of underground basement parking below the building. 118 spaces on basement floor and 66 on lower ground The retaining walls required to achieve the underground parking to retain the adjacent public realm / highway were 6m deep The proposed changes to the parking standards would have required Pinnacle to provide the full increased requirement on plot</p>	<p>See above.</p> <p>CMKAP Policy T4 in the CMK Business Neighbourhood Plan also allows for a commuted sum to be used where all of the parking cannot be provided on-plot, although it is acknowledged that this approach still carries with it implications for viability.</p>

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	<p>To provide 632 spaces would require 6 levels of underground parking Allowing 3m height clearance per floor, the depth of the basement parking would be 18m below current street level. <u>This would be totally impracticable and make the development unviable by adding considerable cost to the structure and the overall development</u></p>	
	<p>Para 1.29 states “The parking standards for Zone 1 has the highest level of access to facilities and consequently the lowest parking levels (more restraint)”</p> <p>The proposed changes to Use Class B1 in Zone 1 is in conflict with para 1.29. The proposed changes do not take account of the highest level of access to facilities within Zone 1 and seek to increase the parking provision to match that of Zone 2 where undeveloped land is more widely available to accommodate the parking provision.</p> <p>We therefore request that further consideration be given to reducing the parking provision requirement in CMK / Zone 1 .</p>	<p>See response above in that the standards for CMK represent those included in the CMK Business Neighbourhood Plan, Table 3 and in CMKAP Policy T4.</p>

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BDW Trading Ltd (Barratt Homes)	The parking standards proposed are unworkable. BDW will be unable to comply with the proposed standards whilst continuing to deliver a variety of character areas and a variety of house types and sizes in Milton Keynes.	Section 1 of the SPD provides some flexibility in the application of the standards. It is acknowledged however, that the proposed standards will be challenging to achieve and will require a careful approach to design.
	<p>Recommendations</p> <ul style="list-style-type: none"> • That the presumption against the provision of tandem parking are removed from the document. 	<p>A balance has to be struck between ensuring that adequate parking is provided to meet the demands arising from new developments and the need to ensure and allow high quality design.</p> <p>A survey of residents did demonstrate the relative unpopularity of tandem parking. That and the experience in a number of recent developments has led to the expression in para 4.16 of the presumption against tandem parking. Otis not proposed to change the approach to tandem parking in the SPD.</p>
	<ul style="list-style-type: none"> • Where a plot has achieved independently accessible spaces, there is no visitor requirement for that unit. This accounts for the fact that, with independently accessible spaces, there is reduced verge space to provide on-street visitor parking. 	<p>Unallocated spaces allow for flexibility to accommodate visitor's vehicles and remain an important part of the parking standard. Additional indicative sketches will be included to show layouts that can incorporate both independently accessible on-plot spaces and on-street unallocated spaces.</p>
	<ul style="list-style-type: none"> • Unless evidence is presented, there is no justification for doubling the parking requirement for a 2 bed apartment in Zone 3. BDW suggest that the standard is 1 space per 2 bed apartment as per existing standards and as advised in "Car parking:what works where", only 50% of spaces are allocated. 	<p>Noted. It is proposed to create a new category for 2 bed flats which would reduce the parking requirement for them. The proposed change reflects the Census findings that there is lower car ownership in flats but balances that against the experience in Milton Keynes that many 2 bed flats are occupied often by families or 2 professionals each having a car.</p>

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		<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Table 1, C3 Residential Dwellings: add a new row under 1 bed dwellings called “2 bedroom flats”. The standards to be applied to the 2 bed flats are: <ul style="list-style-type: none"> ○ Zone 1 = 1 space ○ Zone 2 = 1 space +0.33 unallocated ○ Zone 3 = 1 space +0.75 unallocated ○ Zone 4 = 1 space + 0.75 unallocated
	<ul style="list-style-type: none"> • Address the conflict between the proposed parking standards and the densities, house typologies and parking strategies set out in approved Design Codes in the city. If the remaining sites were designed to comply with the proposed parking standards, the form and character of development would fundamentally change and the principles established by the Design Codes would be undermined. 	<p>To address this it is proposed that additional text needs to be included in Section 1 of the SPD - see Proposed Change to SPD on pages 36 and 37 above.</p>
	<ul style="list-style-type: none"> • When Central Bedfordshire adopted new standards they did not enforce sites that were part way through buildout, recognising the impact on site viability. 	<p>As above.</p>

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	<ul style="list-style-type: none"> • Could the Council confirm that visitor parking will be acceptable in the carriageway in some locations (on slower speed roads where parking can be utilised for traffic calming). 4.44 of the draft SPD states that on-street parking should take account the width and nature of the road and that parking should not encroach into the paths of vehicles. 	<p>For slower speed streets there is flexibility to allow parking in the carriageway as this can help to slow traffic speeds in areas where, for example, children could be playing. In the consideration of planning applications regard will still need to be had to the ability of refuse vehicles for example to access these streets.</p>
<p>Nathaniel Lichfield & Partners On behalf of River Street Capital (Silver Oak) Limited</p>	<p>For residential dwellings (Use Class C3), the draft SPD breaks down the parking standards by number of bedrooms. There is no indication within the draft SPD as to whether these are minimum or maximum figures. Whereas for the cycle parking space is explicit in that they are minimum standards.</p> <p>In this respect there is a clear discrepancy between the standards in the Development Plan and draft SPD. The CMKNP makes it clear that the parking standards should be taken as a maximum number of parking spaces. The draft SPD does not indicate if the standards it sets out should be taken as a minimum or maximum.</p>	<p>With the exception of the parking standards for Zone 1 (CMK and Campbell Park), the standards are not maximum but show the expected number of spaces that a development should deliver. This will be made more explicit at the start of Table 1.</p> <p>Proposed change to SPG:</p> <ul style="list-style-type: none"> • Refer in Section 1, Section 2 and at the start of Table 1 that the standards show the amount of parking that developments are expected to deliver. Clarify however, that for Zone 1, CMK and Campbell Park, the standards are maximum standards as per the adopted CMK Business Neighbourhood Plan. <p>Agreed – see above proposed changes to the SPD on pages 30-31 above which address the relationship between the CMK Business Neighbourhood Plan and the SPD.</p>

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	<p>In this respect the draft SPD is not compliant with the recently adopted CMKNP. It is therefore imperative that the draft SPD be amended to make it clear that the requirements in Zone 1 are the maximum provision that is expected and not a minimum requirement.</p>	
	<p>The PSSPD should take into account the accessibility of a development site. Sites located within CMK (such as 809 & 811 Silbury Boulevard) are in highly sustainable locations, in good proximity to the primary shopping area and central leisure and employment destinations. The Development Plan (including the CMKNP) includes aspirations for a greater mix of uses including a more significant residential component within CMK. This can only be achieved through flexibility on parking and other standards within this area. This would be assisted through the application of maximum standards and in this respect we endorse the approach within the CMKNP. It can also be assisted through measures to assist dual use of parking, such as the availability of off-peak parking permits for residents.</p>	<p>Agreed, see above and the approach in CMK Business Neighbourhood Plan policy CMKAP T4 should assist with this.</p> <p>As noted above, the SPD will be amended to provide more detail from the Business Neighbourhood Plan to clarify the position in CMK and Campbell Park.</p>
	<p>The provision of parking within development schemes in CMK is expensive and due to land and other constraints there are limits to the quantum that can be provided. However, CMK needs to be an attractive location for developers to invest and the application of minimum standards and other cost burdens to fund off-site parking will unnecessarily deter investment.</p>	<p>Agreed – as above, the SPD will be revised to incorporate the maximum parking standards from the CMK Business Neighbourhood Plan.</p>

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	<p>CMK provides all the facilities, services and employment opportunities required for day to day sustainable car free living. Existing public transport, walking and cycling facilities are to a very high standard. These provide excellent means of connecting to the train station and wider facilities and employment areas. Residents often live in city centre locations such as Silbury Boulevard to negate the need to own (and therefore park) a vehicle. It is likely that their place of work would also be in the city centre or easily accessible by public transport. This supports the application of the standards as maximum requirements in Zone 1.</p>	<p>Agreed – see above</p>
	<p>Table 2 shows the difference in car ownership levels arising between houses and apartments. The parking standards in the PSSPD fail to acknowledge how this difference impacts upon local car ownership levels. The Zone 1 residential standards also fail to differentiate between one and two bedroom properties.</p>	<p>Noted. It is proposed to create a new category for 2 bed flats which would reduce the parking requirement for them. The proposed change reflects the Census findings that there is lower car ownership in flats but balances that against the experience in Milton Keynes that many 2 bed flats are occupied often by families or 2 professionals each having a car.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Table 1, C3 Residential Dwellings: add a new row under 1 bed dwellings called “2 bedroom flats”. The standards to be applied to the 2 bed flats are: <ul style="list-style-type: none"> ○ Zone 1 = 1 space ○ Zone 2 = 1 space +0.33 unallocated ○ Zone 3 = 1 space +0.75 unallocated ○ Zone 4 = 1 space + 0.75 unallocated

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		For Zone 1, the CMK Business Neighbourhood Plan standards do not differentiate between 2 bed flats and 2 bed houses although the standard for these dwellings is the same as for 1 bed flats.
	To ensure that developments provide the right amount of vehicle parking depending on the circumstances, it is important that the draft SPD is as flexible as possible.	Section 1 provides guidance as to how flexibility in the amount of parking can be introduced into schemes (see paras 1.15, 1.16, 1.17, 1.24)
	Regard also has to be had to tenure types both in terms of different forms of market and affordable housing. For instance, in residential development, properties that are in the private rented sector [PRS] would typically create a need for a lower number of parking spaces than comparable open market for sale units would. Furthermore PRS accommodation is heavily managed and offered 'with' or 'without' parking. A tenant can make a choice between properties and be allocated accommodation that is suited to them. Furthermore, owners of PRS accommodation can also exercise a stricter control over the occupancy of the accommodation than an open market for sale product where there is no day to day management. There is no flexibility within the draft SPD for the parking standards for residential developments to take account of this. These uses are most likely to occur in highly sustainable locations within CMK.	It is not possible to identify a separate parking requirement for properties in the private rented sector as there is no guarantee that such a form of tenancy would continue in perpetuity.

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	<p>The draft SPD fails to reflect the policies within the CMKNP. The text is in effect saying that you meet the standard or else. It provides no guidance on the factors that might indicate flexibility and it pays no regard to the fact that the standard is a maximum in CMK. The fact that the standard is specified as a maximum in CMKNP indicates that there is inherent flexibility, and there is no need for a “rigorous assessment”. The wording that has been utilised is contrary to both the actual content of the policies of the CMKNP and its wider aspiration to create a sustainable community reliant upon a diverse range of modes of transport. This is a factor that the CMKNP seeks to achieve as a fundamental aim whereas the SPD seeks to make provision for the car.</p>	<p>See above and acknowledgement that the SPD will be amended to fully reflect and use the standards for CMK and Campbell Park set out in the CMK set out in the Business Neighbourhood Plan.</p>
	<p>The draft SPD does not go far enough to ensure that the parking standards are flexible where required. The supporting text needs to make it clear that in CMK, the parking standards are considered as a maximum requirement (in conformity with the Development Plan). It should also reiterate that the accessibility of sites located in CMK with taken into account and that a lower standard of parking will be entirely appropriate. Full consideration should also be given to circumstances (i.e. housing tenure, type, locational sustainability etc.) in accordance with the Framework to ensure that the right amount of parking is provided. At present the draft SPD seeks to provide a blanket requirement based not upon circumstances but upon the application of a one size fits all policy.</p>	<p>With regard to the maximum parking standard in CMK this is agreed, see proposed changes above.</p> <p>Section 1 provides guidance as to how flexibility in the amount of parking can be introduced into schemes (see paras 1.15, 1.16, 1.17, 1.24)</p>

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	<p>Accordingly, as the proposed plan is in direct conflict with the adopted Development Plan and the advice in the Framework the content of the draft SPD needs to be changed to achieve conformity. It should also be supplemented with additional information to clearly indicate the sorts of factors that will be taken into account in CMK to identify an appropriate requirement. We consider that that should have regard to the pattern of ownership in the vicinity, the tenure, type and form of accommodation, the ownership model and the management regime that will be in place. We are also firmly of the view that this is a particular issue in CMK where regard needs to be had to the adopted policy and wider aspirations for development and the creation of a sustainable multi-use vibrant community.</p>	<p>Agreed, see above, the standards in the CMK Business Neighbourhood Plan will be used. Business Neighbourhood Plan Policy CMKAP T4 sets out the approach to parking in CMK and Campbell Park.</p>
Milton Keynes Development Partnership LLP	<p>MKDP supports the updating of the parking standards for Milton Keynes, however, it would have been preferable to consider the implications in conjunction with both the CMK Transport and Parking Strategy and the Planning Obligations SPD. As this is not the case, it is vital that the Parking Standards SPD incorporates as much flexibility as possible.</p>	<p>The Parking Standards SPD covers the whole of Milton Keynes and provides guidance for developers when planning new developments. The CMK Transport and Parking Strategy provides some of the means by which new car parking can be accommodated in CMK in the future (as well as considering other modes of transport). The SPD is not dependent on the outcome of the current consultation on the Strategy as many developments will be capable of delivering their parking requirements on site, however, officers in Planning and Transport are working closely on the preparation of these two documents.</p>

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		Similarly with regard to the Planning Obligations SPD this document will not directly impact on the parking requirement arising from a development although it is acknowledged that the impact of the combination of obligations and requirements on the viability of developments will need to be considered.
	Paras 1.16 – 1.25 offer an element of flexibility which is welcomed. Without it, viability of schemes, particularly in Zone 1, will suffer.	Noted. In Zone 1 however, the policies of the CMK Business Neighbourhood Plan will apply, especially Policy CMKAP T4 for Parking and this sets its own criteria and approach to flexibility for developments in Zone 1 (CMK and Campbell Park).
	The transition to a B1 requirement of 1:50sqm in Zone 1 is a concern. The previous target of 1:70sqm has not been met, so increasing it does not make sense and requires explanation. If the intention is to mirror the CMK Alliance Plan then it should clearly stated as being a maximum requirement as it is stated in the Alliance Plan.	This requirement is set out in the adopted CMK Business Neighbourhood Plan and is therefore reflected in the SPD. It is important to note, however, that the parking standards in the Business Neighbourhood Plan are the maximum number of spaces that should be provided. This is not, however, the case for the other parking standards in Zones 2, 3 and 4 which all set out the number of parking spaces that developments are expected to deliver.
	The provision for HGV spaces in Zone 1 office schemes does not seem logical.	This requirement is set out in the adopted CMK Business Neighbourhood Plan and is therefore reflected in the SPD.

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	<p>The A3, A4 and A5 spaces seem excessive and may be a function of using incorrect building area assumptions. Clarification and explanation is required.</p>	<p>For CMK and Campbell Park, the parking standard are set out in the CMK Business Neighbourhood Plan.</p> <p>For the other three zones, it has been acknowledged above that the requirement for parking spaces based in staff numbers is difficult to apply. These standards will be reconsidered.</p>
	<p>Various developers and planners that are working with MKDP have expressed concern over the presumption against tandem parking on the grounds of density and urban design/streetscape implications. While MKDP does not have any exact figures for the density reduction, there would be an impact. There is the potential for this to impact negatively on the 5 year land supply for MKC and therefore MKDP would urge MKC to consider carefully the views of urban designers and architects before finalising this matter.</p>	<p>A balance has to be struck between ensuring that adequate parking is provided to meet the demands arising from new developments and the need to ensure and allow high quality design.</p> <p>A survey of residents did demonstrate the relative unpopularity of tandem parking. That and the experience in a number of recent developments has led to the expression in para 4.16 of the presumption against tandem parking. Otis not proposed to change the approach to tandem parking in the SPD.</p>
Individual	<p>I think there should be less premium rate parking at the City Centre to encourage people to shop and the spaces should NOT be made smaller to enable having more parking spaces as they are narrow enough already. A lot of cars carry young children and older people who require more door opening room. Consultations are pointless if you do not take views of the public on board.</p>	<p>The cost of car parking in CMK does not fall within the remit of the Parking Standards SPD. This is being considered separately.</p> <p>With regards to the bay widths, the supporting evidence shows that across CMK there is currently a range of width of parking bays. Notwithstanding this, however, the reference to changes to bay widths is to be deleted from the SPD.</p>

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		<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Delete Footnote 4 in para 6.9 on page 30 of the draft SPD. • Delete “normally” from the first sentence of paragraph 6.9
<p>Workflow Manager Business Support Civic – Bleak Hall</p>	<p>We need:</p> <ul style="list-style-type: none"> • Many more parking spaces in and around the shopping centre. • Need more multi story car parks. This will encourage people to come to Milton Keynes Shops. • We need much cheaper and more spaces for people who work at or near the shopping centre, at the moment it is ridiculous trying to park to get into work and we have to pay for it as well, which I wouldn't mind if only you could park. I work in the council building and it is near impossible for staff to park because all the shoppers park there, at holiday periods it is even worse. <p>If I have to go to another building for a meeting I can't get parked back at Civic offices again to go back to work.</p> <p>There needs to be staff parking and more other parking for shoppers.</p> <p>At the Escape building there are far too many disabled bays.</p>	<p>The wider issue of the amount and cost of car parking spaces across CMK is not one for the Parking Standards SPD, but is being addressed through a number of short term measures and forms a key part of the Council's emerging CMK Parking and Transport Strategy.</p> <p>The Parking Standards SPD reflects Government guidelines in setting the percentage of parking bays that need to be provided for people with disabilities. This approach is used nationally.</p>
<p>Douglas Campbell</p>	<p>At 2.8 the percentages given relate to all Zones. As overall parking provision between Zones varies so should this</p>	<p>The percentages used to calculate the required number of parking bays for people with disabilities follow government guidelines in</p>

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Consulting Limited, Disability and Charity Management Consultants	percentage. For example in Central MK the percentage at a retail store might need to be double that for Zone 2 to accommodate the same equivalent numbers of disabled people.	"Inclusive Mobility" (Department of Transport, 2005)
	In Table 1 at C.2 the logic may be wrong. Those residential institutions offering higher levels of care may require fewer spaces for residents, but will need a vastly greater number for staff. For example during shift change over there could be a need for parking spaces for two whole shifts of staff.	Parking requirements for C2 Residential Institutions will need to be considered on a case by case basis having regard to the level and nature of care provided.
	At 4.6 the serious issue of obstructed footways for people with mobility and/or visual impairments should be made very clear.	Noted. Suggest amending the final bullet point of para 4.5 to stress this issue. Proposed change to SPD: <ul style="list-style-type: none"> • Add to final bullet point of para 4.5 to read "Footpaths become impassable, causing a serious obstruction and danger for many people especially those with mobility and visual impairments".
	The proposal for reducing the minimum width of standard parking spaces to 2.3m is opposed. There are many people that require extra space to enter and leave a car due to impaired mobility that do not qualify for a blue badge. By adopting such a reduction the council would breach its duties under the Equality Act to promote the welfare of disabled people.	With regards to the bay widths, the supporting evidence shows that across CMK there is currently a range of width of parking bays. Notwithstanding this, however, the reference to changes to bay widths is to be deleted from the SPD. Proposed change to SPD: <ul style="list-style-type: none"> • Delete Footnote 4 in para 6.9 on page 30 of the draft SPD. • Delete "normally" from the first sentence of paragraph 6.9

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<p>CMYK (Planning and Design) Ltd acting for Taylor Wimpey (South Midlands)</p>	<p>Parking for Electric Vehicles Paragraph 2.4 – For private residential dwellings the charging point will be the dwelling itself and therefore the requirement to specify dedicated spaces seems superfluous. Providing charging points for visitor spaces will raise issues of management and maintenance of these charging points.</p>	<p>MKC Response and recommended changes to the SPD</p> <p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>A number of changes are proposed in relation to electric vehicles. Given the Council’s bid to the OLEV Go Ultra Low City Scheme, it would be relevant to add some additional detail to Section 2 of the SPD (Parking for Electric Vehicles) in order to raise awareness of the Council’s commitment to this initiative.</p> <p>Proposed changes to the SPD:</p> <ul style="list-style-type: none"> • It is recommended that a new paragraph is added after 2.3 to read: “The Council has recently submitted a funding bid to the OLEV Go Ultra Low City Scheme with the intention of dramatically increasing the numbers of ultra-low emissions vehicles on the city’s roads. Measures in the bid include the Milton Keynes Promise that will guarantee the provision of a charge post near to the homes of owners who do not have off-street parking. The Promise will initially see delivery of 200 night time changing points and work is underway to find a suitable charging post design.” <p>Clarify that Table 4 (Parking Standards for Electric Vehicles) applies to non-residential developments.</p> <ul style="list-style-type: none"> • Amend title of Table 4 to read “Parking Standards for Electric Vehicles in non-residential developments” .

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	<p>Table 1 – C3 Residential dwellings</p> <p>It is noted that a number of the standards for residential dwellings have increased including the need for unallocated spaces and the number of spaces for two bed flats in zone 3. The increase in allocated parking for 2 bed flats within Zone 3 from 1 space to 2 spaces will result in large car parks serving moderate sized blocks. It can be demonstrated, for example, that the surface area required to park 18 vehicles for a block of 9 two bed flats (within a three storey building) is considerably larger than the surface area of the flat block itself. The increases proposed for residential developments may seem small, but when applied to a larger site of say 100 units could lead to an increase of approx. 12 spaces across a site. An example based on 100 dwellings in zone 3 is set out below. This increase will then impact on the space available for dwellings and lead to car dominated environments and blocks of flats potentially becoming isolated from the surrounding built form. This level of parking will also have an impact on the density of a scheme, and a negative effect on the site’s viability.</p>	<p>Noted. It is proposed to create a new category for 2 bed flats which would reduce the parking requirement for them. The proposed change reflects the Census findings that there is lower car ownership in flats but balances that against the experience in Milton Keynes that many 2 bed flats are occupied often by families or 2 professionals each having a car.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Table 1, C3 Residential Dwellings: add a new row under 1 bed dwellings called “2 bedroom flats”. The standards to be applied to the 2 bed flats are: <ul style="list-style-type: none"> ○ Zone 1 = 1 space ○ Zone 2 = 1 space +0.33 unallocated ○ Zone 3 = 1 space +0.75 unallocated ○ Zone 4 = 1 space + 0.75 unallocated
	<p>It is noted that the advice relating to parking courts (paragraph 4.24) especially for apartments is proposed to be removed, this is not supported.</p>	<p>Whilst para 4.19 sets out that the council would rather not see the use of large rear parking courts, the following paragraphs (4.21 – 4.28 incl) are retained and set out guidance and advice of rear parking courts are to be used.</p>
	<p>The proposed removal of paragraph 4.33 and 4.34 which would now allow for flats over parking and dwellings in parking courts is welcomed.</p>	<p>Noted</p>

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	<p>Conclusions The Consultation Document seeks to prohibit the use of ‘Tandem’ parking yet this is still widely accepted in other Local Authorities both locally and nationally. Almost all Local Authorities that allow garages to contribute towards the allocated parking provision (Manual for Streets makes the point that 50% of garages are used) and therefore accept the principle that there is nearly always a ‘driveway’ in front of the garage. This means that the parking space in the garage is not independently accessibly. As Milton Keynes do not accept that garages can count towards the parking provision, the use of one space behind another (tandem parking) is no different from the widely accepted principle where a garage is used. Therefore this form of parking should remain as acceptable.</p> <p>Whether on plot, allocated ‘side by side’ spaces or additional visitor parking spaces are used in conjunction with ‘tandem’ spaces, it is clear that the density of a scheme will be less than previously afforded. This will not only result in non-conformity with approved Design Codes (for Outline Approved developments) but will also have an impact on the viability of new schemes and will not make best use of the land. It will often result in a fundamental change in the urban form of a scheme and will result in car dominated environments.</p>	<p>A balance has to be struck between ensuring that adequate parking is provided to meet the demands arising from new developments and the need to ensure and allow high quality design.</p> <p>A survey of residents did demonstrate the relative unpopularity of tandem parking. That and the experience in a number of recent developments has led to the expression in para 4.16 of the presumption against tandem parking. Otis not proposed to change the approach to tandem paring in the SPD.</p> <p>Section One of the SPD is to be amended to include reference to the relationship between the new Parking Standards SPD and existing planning permissions and consents.</p>

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	The adoption of the parking standards as proposed will lead to the need for more road space and more space within residential development for parking, which will have a dramatic and detrimental effect on the amount of dwellings a site can accommodate and the design and urban form of new residential developments.	Noted. Further guidance and indicative layout plans are to be included in the SPD to demonstrate possible designs that address the new SPD requirements.
Midlands South East Homes & Communities Agency	<p>Table 1, Vehicle Parking Standards to be applied to C3 Residential Dwellings in Zone 3</p> <p>It would appear that there will no longer be a distinction between parking standards for a 2 bedroom flat and a 2 bedroom house and that the proposed new standards will require an increased provision from 1 to 2 allocated spaces per 2 bedroom flat. Although it is acknowledged that the requirement for unallocated spaces has been reduced from 0.5 to 0.25 this proposed new standard will generate a net increase in parking provision. For example, when applied to a recently consented scheme comprising 43, 2 bedroom apartments the proposed new standard will result in an increase of over 32 parking spaces;</p>	<p>Noted. It is proposed to create a new category for 2 bed flats which would reduce the parking requirement for them. The proposed change reflects the Census findings that there is lower car ownership in flats but balances that against the experience in Milton Keynes that many 2 bed flats are occupied often by families or 2 professionals each having a car.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Table 1, C3 Residential Dwellings: add a new row under 1 bed dwellings called “2 bedroom flats”. The standards to be applied to the 2 bed flats are: <ul style="list-style-type: none"> ○ Zone 1 = 1 space ○ Zone 2 = 1 space +0.33 unallocated ○ Zone 3 = 1 space +0.75 unallocated ○ Zone 4 = 1 space + 0.75 unallocated

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	<p>Section 4, paragraph 4.16 - Presumption against the provision of tandem spaces</p> <p>The draft standards express a presumption against the provision of tandem spaces (spaces that are not independently accessible) for all homes (ie 4 bedrooms or fewer). Where tandem parking is provided the proposed new standard requires one additional on-street, unallocated parking space per two dwellings that have tandem parking spaces.</p>	Noted
	<p>This will have a significant impact on the urban form and capacity of development sites. Compliance with the proposed new standard will restrict the opportunity to create contiguous, 'joined up' frontages that define the streetscape and will restrict the form of development and dwelling typologies, reducing variety, choice and dwelling numbers.</p> <p>The proposed new standard will promote a lower density fragmented streetscape with dwellings separated by wide side parking areas, or dwellings set back from the street to allow for parking to the front, increasing the dominance of parking on the streetscape.</p>	<p>A balance has to be struck between ensuring that adequate parking is provided to meet the demands arising from new developments and the need to ensure and allow high quality design.</p> <p>A survey of residents did demonstrate the relative unpopularity of tandem parking. That and the experience in a number of recent developments has led to the expression in para 4.16 of the presumption against tandem parking. It is not proposed to change the approach to tandem parking in the SPD.</p>

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	<p>Figure 2 On-Plot Parking. Whilst illustrations can provide useful guidance, the diagrams provided are not an accurate representation of dwelling typologies. For example, ‘right angle parking on-plot’ shows two parking spaces to the front of each terraced house, requiring a plot width of at least 6 metres, whereas a review of recent developments confirms that typically, a terraced house plan is less than 5 metres wide, the terraced house form generally being used to deliver smaller 2/3 bedroom dwellings.</p> <p>In addition the diagrams at Figure 2 do not include the provision of unallocated spaces; for completeness the layout should be amended to show how the full parking standards can be met.</p>	<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>Noted. Changes will be made to this diagram – to note, though, we have measured some recent terraces at 5.5m wide. 2 spaces side by side will only work if the property is at least 5.5m wide. If just 5m wide then this will only be acceptable for a terrace of max 3 units and there will need to be space for pedestrian circulation through the spaces to the front to the houses.</p> <p>The supporting text should be amended to say that the difficulty with providing a lot of parking to the front is how to achieve the required visitor provision.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Amend figure 2 On-Plot parking diagram to show how this can be accommodated.
	<p>Whilst HCA supports the inclusion of examples as a practical way to illustrate the Council’s aspirations for development, it would be more helpful if the diagrams were replaced with real ‘scalable’ examples (case studies) that provide robust guidance for designers.</p>	<p>The diagrams are intended to provide illustrative examples of possible solutions to accommodating the parking spaces in certain developments. Making them scalable would potentially give them too much weight and might suggest that these are the only solutions that MKC would accept.</p>

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	<p>In conclusion, HCA supports the Council’s ambition to produce a single source of information relating to parking provision in Milton Keynes. However, with the focus on accelerating housing delivery and increasing housing supply, the Agency encourages the Council to reconsider the introduction of new standards that will effectively reduce housing capacity of development sites.</p>	Noted
<p>Places for People (comments additional to Abbeygate)</p>	<p>B1, A3, A4 and A5 uses – The additional standards for A3, A4 and A5 result in an excessive requirement for parking in all zones. The statement that these standards are comparable to other local authorities may be correct in principle but the distinction is that many authorities. Only count the actual ‘retail’ area rather than the floor area of the unit.</p>	<p>The standards for A3, A4 and A5 in the draft SPD are to be reviewed to combine the requirement for the public and staff. It should be noted, however, that the standards in the draft SPD do relate to the “public” ie “retail” area – for example, for A3 uses the requirement is based on the dining area; for A4 on the bar area.</p>

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	<p>The parking requirements proposed for A3 Use Class a) Restaurants/cafes in Zone 3 is too high. The Council is recommending this use class requires 1/4m² for both staff and customers. This is an overprovision of parking spaces that will erode the character of the urban realm by creating a car dominated environment – a result that is counter to those aspiring to create high quality neighbourhoods. Our experience of parking standards employed by other local authorities shows the proposals cannot be justified on the popularity of owning a car by residents of Milton Keynes.</p> <p>Based on the proposals a small restaurant (100sqm) in Zone 3 would require 50 spaces (25 for customer, 25 for staff). This level of provision is excessive and will create a surplus of spaces and an erosion in the quality of public realm.</p>	<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>The standard for the A3 uses across Zones 2-4 will be looked at as above. The current standard is 1 space per 10sqm. As part of the review of the standards we will consider whether to continue the approach in the existing SPG to base the parking requirement on gross floor area or to calculate it on the size of the dining area.</p> <p>Proposed changes to SPD:</p> <ul style="list-style-type: none"> • Review the parking standard for the A3, A4 and A5 uses, and move away from an approach that distinguishes between dining area and staff numbers.
	<p>Recommend the parking standards for B1, A3, A4 and A5 uses be reassessed and lower the provision to a more practical level.</p>	<p>Noted, as above</p>
	<p>Relationship of approved Design Codes to the Draft Parking Standards – there should be clarity on the weight applied to the DPSs in the event of a conflict with approved, pre-existing design codes. We are required to submit reserved matters applications that comply with approved Design Codes and suggest the Approved Design Codes take precedence.</p>	<p>As noted above, additional text is to be included to explain the relationship between existing consents and approved design codes and the new SPD.</p>
	<p>Recommendation – That clarity is provided on the precedence to be given to documents.</p>	<p>Agreed.</p>

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Abbeygate (comments linked and additional in discussion with Places for People)	<p>Tandem Parking <i>Recommendation – that the previously adopted standards are retained and that the presumption against tandem parking in 4.16 is deleted.</i></p>	<p>A balance has to be struck between ensuring that adequate parking is provided to meet the demands arising from new developments and the need to ensure and allow high quality design.</p> <p>It is acknowledged that some of the revised residential standards will present challenges for designers in creating attractive and varied layouts, however, the standards are considered to be appropriate based on experience in Milton Keynes and when set against those used by other local authorities. The impact of the Parking Standards SPD will be kept under review as new developments implementing the new standards come forward.</p> <p>The Urban Design and Landscape Architecture Team at the Council undertook a parking survey of over 1200 households a few years ago and survey results demonstrated that tandem parking is not popular with those residents who have 2 or more cars with the result that the 2nd car is often parked on the street (and when the street isn't designed to accommodate this parked car then problems with the quality of the streetscape arise). This has led to the approach that where residents live in a home with tandem parking, space should be provided on street (outside of the carriageway) as close to their front door as possible. The meaning of 'convenient' is to be clarified:</p>

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		<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Amend Footnote 3 in para 4.16 to read: “for the avoidance of doubt, “additional” means in addition to the usual requirement for unallocated on-street parking spaces. “Convenient” means an on-street space within 15 metres of the front of the property where tandem parking is provided”.
	<p>A need for a greater degree of flexibility - Paras 1.16 and 1.17 impose a requirement for extensive assessment and analysis of any deviation, greater or lesser, from the proposed standards. This is extremely restrictive and is likely to create a significant amount of additional unnecessary work in order to justify a minor variation.</p> <p><i>Recommendation – incorporate a degree of flexibility in provision before requiring the extensive work required under 1.17.</i></p>	<p>The approach to flexibility in the application of the parking standards is particularly set out in paras 1.15 through to 1.24.</p> <p>The zonal approach taken on the SPD takes account of the characteristics of the location of the development site and is consistent with other local authorities.</p> <p>Paras 1.15 and 1.24 of the SPD acknowledge both the need to reflect local circumstances and the requirements of individual developments as well as recognising that mixed-use retail/leisure developments, for example, may justify a reduction in parking, as a result of a certain amount of trip linking.</p> <p>Please note that for developments in CMK and Campbell Park applicants will need to refer to the Parking Standards and the requirements of Policy CMKAP T4 in the CMK business Neighbourhood Plan for clarification of the flexibility to be applied here.</p>

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	<p>Parking Provision for Flats – <i>Recommendation – Based on the Council’s own evidence a differentiation should be made between the requirements for flats and houses and that the current standard, set out in the April 2009 Addendum to the Parking Standards, be retained for 1 and 2 bed flats.</i></p>	<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>Noted. It is proposed to create a new category for 2 bed flats which would reduce the parking requirement for them. The proposed change reflects the Census findings that there is lower car ownership in flats but balances that against the experience in Milton Keynes that many 2 bed flats are occupied often by families or 2 professionals each having a car.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Table 1, C3 Residential Dwellings: add a new row under 1 bed dwellings called “2 bedroom flats”. The standards to be applied to the 2 bed flats are: <ul style="list-style-type: none"> ○ Zone 1 = 1 space ○ Zone 2 = 1 space +0.33 unallocated ○ Zone 3 = 1 space +0.75 unallocated ○ Zone 4 = 1 space + 0.75 unallocated
	<p>Para 6.9⁴ - A minimum parking space width be 2.3m is likely to be problematic. <i>Recommendation – The minimum size of a parking space should be 5m x 2.5m</i></p>	<p>With regards to the bay widths, the supporting evidence shows that across CMK there is currently a range of width of parking bays. Notwithstanding this, however, the reference to changes to bay widths is to be deleted from the SPD.</p> <p>Proposed change to SPD:</p> <ul style="list-style-type: none"> • Delete Footnote 4 in para 6.9 on page 30 of the draft SPD. • Delete “normally” from the first sentence of paragraph 6.9

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	<p>Linked Trips - Para 1.24 – The Draft correctly identifies that mixed use developments generate linked trips that reduce the need for parking spaces, however, it fails to adequately define a method of taking the impact of linked trips into account.</p> <p><i>Recommendation – That a mechanism to take account of linked trips is incorporated.</i></p>	<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>As noted, paras 1.15 and 1.24 of the SPD acknowledge both the need to reflect local circumstances and the requirements of individual developments as well as recognising that mixed-use retail/leisure developments, for example, may justify a reduction in parking, as a result of a certain amount of trip linking.</p> <p>Each site and proposal will need to be considered on its merits having regards to the proposed uses, location and the nature of the trip linking. For this reason it is not considered beneficial to set out a mechanism in the SPD.</p>
	<p>Shared Use - The Draft does not acknowledge shared use provision, where uses operate at different times or days of the week and as a result there could be a double utilisation of car parking spaces</p> <p><i>Recommendation – That a mechanism to take account of shared use is incorporated.</i></p>	<p>Paragraph 1.24 acknowledges the need to consider local circumstances. The reference in the paragraph is to mixed use leisure/retail development and consideration should also be given to providing further clarity as to how parking standards in general in mixed use areas which include residential development will be applied flexibly.</p> <p>In such areas the demand for parking spaces may peak at different times of day for the different uses and this can have the effect of allowing greater sharing of spaces rather than each use having to meet its specific parking requirement. Trip linking can, though, as acknowledged above, result in increased dwell time which reduces the rate of turnover of parking spaces.</p>

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		<p>Proposed changes to the SPD:</p> <ul style="list-style-type: none"> • Add additional text to para 1.24 to include consideration of residential parking alongside leisure/retail mixed use.
	<p>Local Centres in outlying mixed use areas - Some mixed use areas located in Zones 3 or 4 (such as the proposed Brooklands Square) will be both highly accessible to public transport and, particularly in the case of retail and leisure, serve a local population catchment. This will result in them attracting visitors who will be more likely to travel on foot or by bike rather than by car.</p> <p><i>Recommendation – That a mechanism to take account of the greater reduced need for car parking in local centres is incorporated.</i></p>	<p>Brooklands local centre is not considered to have the range of facilities or public transport accessibility that would be expected to be the case for centres identified in Zone 2. It is not therefore proposed to change the Zoning of this area.</p>
	<p>B1 – Business The ‘rationale’ comment should be deleted the current standard for Zone 1 is 1:70. Self-evidently there will be an impact on both design, layout and viability if this new standard for Zone 1 is adopted. The proposed provision of HGV space particularly in Zone 1 is excessive.</p>	<p>The Rationale column will be deleted from the adopted version of the SPD – it was included in the draft to provide some explanation for changes to parking standards.</p> <p>the standard for B1 in Zone 1 is taken from that in the adopted CMK Business Neighbourhood Plan which statutorily carries more weight than the SPD will.</p>

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	<p>A3, A4 and A5 uses – The additional standards for A3, A4 and A5 result in an excessive requirement for parking in all Zones. The statement that these standards are comparable to other local authorities may be correct in principle but the distinction is that many authorities only count the actual retail area rather than the entire building.</p> <p>By way of example – taking a notional 100sqm relatively small restaurant in Zone 3 the car parking required equates to 50 spaces (25 spaces for customers and 25 spaces for staff). Even assuming that everyone using or working at the restaurant came in their own car this equates to an occupation rate of 2sqm per customer – clearly this is incorrect.</p>	<p>Note: all references to page and paragraph numbers are those in the <u>consultation draft SPD</u>.</p> <p>The standards for A3, A4 and A5 in the draft SPD are to be reviewed to combine the requirement for the public and staff. It should be noted, however, that the standards in the draft SPD do relate to the “public” ie “retail” area – for example, for A3 uses the requirement is based on the dining area; for A4 on the bar area.</p> <p>The standard for the A3 uses across Zones 2-4 will be looked at as above. The current standard is 1 space per 10sqm. As part of the review of the standards we will consider whether to continue the approach in the existing SPG to base the parking requirement on gross floor area or to calculate it on the size of the dining area.</p> <p>Proposed changes to SPD: Review the parking standard for the A3, A4 an A5 uses, and move away from an approach that distinguishes between dining area and staff numbers.</p>
	<p><i>Recommendation – That the required parking provision for A3, A4 and A5 uses be reassessed on the basis of what might actually occur in reality.</i></p>	<p>Noted, see above</p>

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IDI Gazeley	<p>IDI Gazeley submits that the blanket car park policy the Council proposes to apply to warehouses of all sizes is inappropriate and would result in wasteful over provision.</p> <p>The policy should be amended to make a distinction between warehouses above 10,000 sq metres which will generally operate as national distribution centres and employ relatively fewer staff on a multi shift basis; and those below that threshold which will serve a smaller region or locality and employ comparatively more people per unit area of floor space.</p> <p>If it is accepted that the Council's standard of 1 space per 30 sq metres is appropriate for the office floor space, then a standard of 1 space per 200 sq metres for "Other" space would be more appropriate than that of 1 per 100 sq metres now being proposed. Alternatively, a standard related to the overall floor space within the warehouse of 1 space per 160 sq metres would also be appropriate.</p> <p>A variation along the lines proposed by IDI Gazeley would be close to the standard operated by the neighbouring local authority.</p>	<p>We do not accept that a lower parking standard should be applied to larger warehouse units. Applicants can, however, justify a lower standard within their Transport Assessment should they wish to do so.</p> <p>The draft Parking Standards SPD proposes no change to the standards for B8 uses from those in the current standards, other than for HGV parking where the requirement has increased from 1 HGV space per 500m² to 1 space per 300m².</p> <p>On the basis of the past experience of applying these standards it is not proposed to make any changes to them in the SPD.</p>
Campus Director University Campus Milton Keynes	I confirm that we have no comment with regards to the SPD Milton Keynes Council (Draft Parking Standards) in relation to the University of Bedfordshire's operation in the town.	Noted

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Natural England	Does not consider the standards pose any risk or opportunity to their statutory purpose, therefore does not wish to comment	Noted
Age UK Milton Keynes	1.11 request details of who was spoken to in the stakeholder consultation exercise	Some 224 stakeholders were invited to take part in the survey, as well as all MKC ward councillors. The stakeholders included developers, landowners, transport users groups, local and national organisations as well as neighbouring local authorities.
	1.28 zones – comment on whether out of town centres (MK1, Beacon Hill Retail Park, Winterhill etc) undergoing refurbishment which could attract traffic which may not fit with the zonal approach	We have set out above that there is justification in moving MK1/Stadium MK area into Zone 2 from Zone 3 due to the range of facilities offered and a high level of public transport accessibility. The zonal approach does allow for parking standards for both residential and non-residential uses to be adjusted according to the land use offer and public transport availability.
	Table 1 – C2 residential institutions – does this cover developments such as the two Extracare Villages or are these covered elsewhere? Locations of these in poor PT areas but with high resident car ownership has made them problematic. Either parking standards need to be reviewed or future development considered in terms of local centres and public transport	The flexibility now contained within the standards allows consideration of the end user as well as location and public transport
	Width of non residential parking spaces – concerned with reducing amount of space available for all users, particularly elderly, disabled and those with children. Request the amendment is reconsidered	Noted. The decision to create narrower parking spaces in CMK has now been reversed and all reference to narrowing of spaces in the SPD is to be removed.

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Individual	Policy for cycle parking provision mostly looks good. Supports addition of suitable secure systems.	Noted
	Would like to see requirement for rain protection for short term parking (e.g. CMK station) may only be possible for developments over a certain size	Noted. Such provision could take up too much space and compromise street scene.
	Formatting / publishing of document needs clarification about where cycle parking details are and separate section made	Noted. Will be addressed in final version.
Policy Executive Milton Keynes Chamber of Commerce	Featherstone Road MK12 - parking on both sides narrows road impacting on HGV & emergency vehicle access	Evidence that parking & streets need to be appropriately designed to avoid future problems.
	Road markings unclear / nonexistent resulting in obstruction to business access & obstruction of visibility at junctions Road markings and waiting restrictions needed to keep access and junctions clear	Highways to liaise with emergency services colleagues to investigate
Residents of Campbell Park in new build shared ownership	They did not receive allocated parking, as was the case for other shared ownership residents which causes competition for limited spaces.	Noted. Permissions should be specific about the allocation of parking
	Suggested considerations – Shared ownership spaces should be controlled for residents only and not available for others (general public / shoppers / event visitors / fellow residents 2 nd partner cars)	Noted. It is proposed to include text along the lines of that currently in the 2005 Parking Standards SPG that requires all dwellings to have at least one off-street parking space which is independently accessible. Proposed change to the SPD: <ul style="list-style-type: none"> • All dwellings, whether shared ownership or market housing should have access to at least 1, independently accessible, off-street parking space.

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	<p>Prices of homes mean likely in multiple occupancy which adds to parking demand.</p> <p>2011 census 41.5% apartment residents do not own a car needs to be checked as believed to be incorrect</p>	<p>This car ownership for apartments has been checked against 2011 Census data and is correct. The same dataset shows the following;</p> <p>46.3% own 1 car and 12.4% own 2 or more cars.</p> <p>The ownership levels for houses is; 14.8% do not own a car, 42.7% own 1 car and 42.5% own 2 or more cars.</p> <p>The 2011 data shows that 48.7% of employed residents of Campbell Park ward drive to work.</p>
	<p>Delay in adopting roads can lead to parking / management problems.</p>	<p>Noted, although this is something outside of the control of the Parking Standards SPD.</p>
	<p>Road widths in new developments need to be wide enough to accommodate emergency vehicles between parking on sides of the road.</p>	<p>Noted. Section 4 of the SPD provides guidance for the location of on-street parking spaces and seeks to ensure that parked vehicles do not intrude into the track path of buses and other larger vehicles.</p>
<p>Individual</p>	<p>Tandem Parking – agree with proposal as lacks flexibility and puts pressure on on-street parking</p>	<p>Noted.</p>
	<p>Width of non-residential parking – disagree as people are getting bigger and older driving population need more space</p>	<p>Noted. The decision to create narrower parking spaces in CMK has now been reversed and all reference to narrowing of spaces in the SPD is to be removed.</p>

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Right to Ride Representative, Milton Keynes, North Bucks + South Northants CYCLISTS TOURING CLUB	<p>Generally welcome changes, a step forward. Increase in cycle theft needs secure parking – in order of preference for larger dwellings garages, sheds. For smaller dwellings secure lockers preferable to stands in enclosed compounds.</p> <p>Short term Sheffield stand is best. Long term – cover as important as security</p> <p>Parking should also be in full public surveillance and not hidden away from view.</p>	Noted. Guidance for the design and location of cycle parking in both residential and non-residential areas is provided in Section 5 of the draft SPD (paras 5.4-5.7 incl).
	Concern is the inability to always enforce cycle parking standards in city developments – e.g. Aldi in Bradwell Common still has no cycle parking. Needs to be made a mandatory condition.	Noted – comments to be passed to enforcement colleagues