



Statement of Consultation

to the Draft Provision of Parking on New Developments

Supplementary Planning Document

**In accordance with Regulation 12 (a) of The Town and Country Planning
(Local Planning) (England) Regulations 2012**

January 2023

Information on the Consultation

Regulation 12(a)(i)

Consultation was undertaken on the scoping of the Provision of Parking on New Developments Supplementary Planning Document between 9th June 2022 and 7th July 2022.

The scoping consultation provided a document. The scoping document was set out following the structure intended for the completed document, with 14 chapters. In each, the content proposed to be included was summarised. Consultation questions were set out inviting comments on the scope of the particular chapter, what should be included or not etc. The questions are set out in the later section of this statement providing the responses to the consultation.

The consultation on the Scoping of the Provision of Parking on New Developments SPD was sent to all consultees registered on the Fylde Council Planning Policy database.

Information on the responses received is set out in the following section.

Summary of Representations Received and How These Have Been Addressed in the Draft SPD
Regulation 12(a)(ii) and (iii)

The consultation on the Scoping of the SPD resulted in responses from 18 consultees. The points raised in representation are set out below in accordance with Regulation 12(a)(ii) and the Council's response is shown in the right hand column, indicating how the issues raised have been addressed in accordance with Regulation 12(a)(iii). The responses are ordered in accordance with the structure of the Scoping document, with the chapter headings and consultation questions set out for reference.

Consultee	Key text from representation	Council Response
General		
Hugh Beaton	On reviewing this I feel this is a step in the right direction and hopefully many others will be in agreement from Councils, Developers and the local communities. Trying to develop a better environment that we all live in.	Comment noted
Warren Hilton, National Highways	National Highways has no comments to make on the scope of either of these SPDs	Comment noted
Dominic Rogers, Natural England	<p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major impacts on the natural environment. We therefore do not wish to provide specific comments, but advise you to consider the following issues: [considered within relevant sections below]</p> <p>Protected species: Natural England has produced Standing Advice to help local planning authorities assess the impact of particular developments on protected or priority species.</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment: A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are</p>	Comment noted

	required to consult us at certain stages as set out in the Planning Practice Guidance.	
Deb Roberts, The Coal Authority	As you are aware, Fylde Council lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc.	Comment noted
Julie Hartley, School Planning Team, Lancashire County Council	We have reviewed the two Supplementary Planning Documents (SPD's) you emailed as part of the consultation process, and the SPT cannot see that either SPD's would require our input, thank you for sharing them with us.	Comment noted
Emily Hrycan, Historic England	Thank you for consulting Historic England on the above document. At this stage we have no comments to make on its content.	Comment noted
Nicola Elsworth, Homes England	Homes England does not wish to make any representations on the above consultation. We will however continue to engage with you as appropriate.	Comment noted

	<p>health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the development of the SPD, particularly principles 6, 7 and 8. The document can be downloaded via the following link:</p> <p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</p> <p>The section on our web page now contains updated case studies and more information regarding putting the principles of Active Design into practice. In order to bridge the gap between the high-level principles of Active Design and delivery in practice, we have worked with the Building Research Establishment (BRE) (BREEAM).</p>	
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Jane Lings, Treales, Roseacre and Wharles Parish Council	Unfortunately I have not had a response from the Council, and therefore please take this email as no comments submitted.	Noted
N Bibby, Freckleton Parish Council	FPC support both of the supplementary planning consultations	Comment noted
Alex Hazel, Environment Agency	Our remit in relation to this SPD is limited, but we have the following comments. We would recommend the SPD seeks to address climate change mitigation and adaption where possible.	Comment noted. The Draft SPD includes measures to require tree cover in car parking areas to create shade, and sustainable drainage to reduce flood risk
Introduction		
Q1. Do you agree that the Council should produce an SPD to provide detailed guidance on parking on development sites?		
Chris Hibbert, Henco	We have undertaken a wide variety of commercial/out of town developments in Fylde over the years and so our comments are largely focused on this sector rather than residential/in town development. Car parking requirements and guidance already form part of the planning process and discussion with the allocated planning officer through the application process. Any further guidance documents should be used as such, guidance, with parking standards for commercial developments assessed on a case by case basis reflecting on location, user demand and availability/likelihood of use of alternate methods of transport.	Comments noted. The approach of the SPD is to provide minimum standards and requirements, to ensure that applicants understand what is required to ensure policy compliance. As with all planning applications, the circumstances of the individual site will be taken into account in decision-making.
Kevin Martin, St Annes Town Council	Yes	Support noted

Peter Bull, Little Eccleston-with-Larbreck Parish Council	Yes	Support noted
Glenn Robinson, Lancashire County Council Highway Service	Yes	Support noted
<p>Vision, Issues and Objectives</p> <p>Q2. Do you agree with that the SPD should consider the issues above, and are there any others that should be added?</p>		
Chris Hibbert, Henco	They should be considered	Support noted
Kevin Martin, St Annes Town Council	Yes	Support noted
Peter Bull, Little Eccleston-with-Larbreck Parish Council	Yes but also ensure that parking spaces reflect the size and width of modern vehicles. Far too many spaces are wholly inadequate	<p>Support noted.</p> <p>The Draft SPD increases the standard size of spaces slightly from previous guidance, reflecting the Council's current practice on its own parking areas. New guidance is expected from government on the standard size for parking spaces; the sizes used in the Draft SPD will be reviewed for the final SPD in light of any new guidance produced</p>
Glenn Robinson, Lancashire County Council Highway Service	Yes. Don't consider anything needs to be added	Support noted

Q3. Do you agree with the objectives as stated? Are there any that should not be included or should be amended, or further objectives that should be added?

Chris Hibbert, Henco

The suggestion of increasing pedestrian circulation space and landscaping around parking is obviously an ideal. Constraints on space available to a development along with feasibility (particularly in the current climate) may limit options in this regard.

As an example, we have installed a number of parking shelters on developments over the last 10 years. Clients always laugh when we carry out the installation, well aware that no one in the building will ever cycle to work due to the nature of their business and ask why we are doing it – ‘because it’s a planning condition’. The structures then serve as glorified smoking shelters.

Out of town centres, a lack of “generous, convenient and usable cycle parking” isn’t the problem with low numbers of journeys by bicycle. Distinction needs to be made between town centre and out of town/commercial developments. Certain occupier types gravitate to business parks generally for their convenience/proximity to arterial routes and because the nature of their business requires frequent car/van movement. Parking happens at the end of a journey, to start with, more focus needs to be put on improving cycle lanes/infrastructure in the borough to stand a chance of increasing journey numbers by bicycle.

Regarding electric vehicle charging points again, on commercial & industrial developments, if there is a business need for charging points, the occupier/business owner can carry out these installations themselves. Often incentives around charging point installation are focused on the end user or car/business owner rather than developer. User installation also means that the correct type of charging point for their needs is met.

Good design is a basic requirement of Local Plan policy. The Local Plan was demonstrated to be viable. The Draft SPD sets out design requirements for car parking areas. It is not accepted that poorly designed development should be accepted, or that staff should be prevented from choosing to cycle to work on new development sites because of lack of suitable provision for them.

As noted in the Draft SPD, the requirement for electric vehicle charging points is now set out within Building Regulations, and therefore will need to be apparent on planning drawings.

Chris Hibbert, Henco cont'd	<p>Vehicle charging points can easily be retro fitted to buildings from the users own building electricity supply.</p> <p>As long as ducting in in place to future proof developments with car parks detached from buildings to allow for simple charging point installation at a later stage this should be enough of a requirement.</p> <p>Depending on type of charging installation, there could also be legal issues on some developments if there are conditions imposed on a developer to provide charging points and that development is then either sold or let. Where does responsibility of the asset sit, landlord or tenant?</p>	
Kevin Martin, St Annes Town Council	No – New developments are not well designed, roads too narrow, often no FPs, garages only fit to park a pram in, and no visitor parking. Most 3-4 bed houses have two vehicles without any visitors	
Peter Bull, Little Eccleston-with-Larbreck Parish Council	They appear Ok to me, but they need to be enforced	
Glenn Robinson, Lancashire County Council Highway Service	Yes. Don't consider anything needs to be added	
Policy and Guidance Review		
Marcus Hudson, Lancashire County Council	In addition to this I recommend that you make specific reference to The Department for Transport's Local Transport Note 1/20 Cycle Infrastructure Design. This note provides prescriptive and ambitious guidance in terms of implementing new infrastructure. In particular, I recommend referencing requirements set out in chapter 11 (Cycle Parking and other Equipment) as guidance to address the issues outlined in sections 7.1 -7.6 inclusive.	Comment noted: reference added

Glenn Robinson, Lancashire County Council Highway Service	Should include reference to LCC's Creating Civilised Streets	Comment noted: reference added
<p>Overall Approach to Parking Requirements</p> <p>Q4. Do you agree with the overall approach of the Council to parking requirements, as proposed to be set out in the SPD?</p>		
Kevin Martin, St Annes Town Council	Yes	Comment noted
Peter Bull, Little Eccleston-with- Larbreck Parish Council	<p>I do not agree with the response to 3.8:</p> <p><i>The needs of non-motorised users, such as pedestrians and cyclists, should be prioritised over other road users, through design measures</i></p> <p>There has to be a correct balance between all users and not at the expense of those that pay road taxation.</p>	This quote is from Local Plan policy and reflects national policy. The principle is to ensure the protection of vulnerable road users.
Glenn Robinson, Lancashire County Council Highway Service	Yes	Comment noted
<p>Q5. What comments do you have on how the Council proposes to vary standards between more and less accessible areas and different types of development?</p>		
Chris Hibbert, Henco	Standards absolutely do need to be assessed on a case by case basis.	The requirements should be assessed on a case by case basis. However national policy allows for the adoption of local standards to provide guidance.
Kevin Martin, St Annes Town Council	Not sure	

Peter Bull, Little Ecclestone-with-Larbreck Parish Council	This is a dynamic planning decision, and I am sure that the planners will use their discretion for the better. Unless	The approach allows decision-makers flexibility in applying the proposed standards
Glenn Robinson, Lancashire County Council Highway Service	None	It is assumed that this means the principle is accepted.
<p>Parking Standards</p> <p>Q6. Do you agree with the Council's proposed approach to parking standards, involving allowance for high accessibility through the identification of specific areas?</p>		
Liz Squires, Kirkham Town Council	<ul style="list-style-type: none"> As a Council we occasionally object to an application because no parking is allocated. We have on-street parking and residents struggle – Freckleton Street and Preston Street are perfect examples. Extra parking from new builds also puts pressure on our existing parking. We are losing parking spaces on Market Square and possibly other areas in Kirkham because of the regen programme, so this has to be taken into consideration. A recent planning report for an application for 16 dwellings stated no parking is required because of on-street parking being available in the town centre. We believe that every application should be looked at and each town treated individually. 	<p>The Draft SPD includes a consideration of the different issues in each town, identifies the issues and proposes solutions in the particular application of the standards. In Kirkham the importance is recognised of priority of parking for business customers rather than residential overspill.</p> <p>The Draft SPD provides for a flexible approach to the application of standards, having regard to the circumstances of the locality and the nature of the development.</p>

Kevin Martin, St Annes Town Council	No	Comment noted
Peter Bull, Little Eccleston-with-Larbreck Parish Council	Yes	Support noted
Glenn Robinson, Lancashire County Council Highway Service	Yes	Support noted
Q7. If not, what alternative approach do you propose?		
Kevin Martin, St Annes Town Council	Park and Ride	This goes beyond the scope of what can be achieved by the SPD, and would require the identification of a site, capital funding for its development and current funding to provide a subsidy. This would be a decision for the Council as a whole, and require engagement with a range of other stakeholders.
Peter Bull, Little Eccleston-with-Larbreck Parish Council	N/A	

Design, dimensions and layout of parking

Q8. Do you agree that the aspects of design of parking set out above should be included in the SPD? What specific aspects of the design of parking do you think it most important to include?

Dominic Rogers, Natural England	<p>Biodiversity enhancement</p> <p>This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraphs 8, 72, 102, 118, 170, 171, 174 and 175 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p>Landscape enhancement</p> <p>The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p>	<p>The Provision of Parking on New Developments SPD does not cover the design of built development itself, and therefore those aspects suggested here that relate to the buildings are not covered here. However, the provision of appropriate soft landscaping including trees and shrubs has been incorporated as a requirement of the SPD and will provide for a degree of biodiversity provision within the parking areas of development sites, and soften the appearance of the parking area and the effect of the built development on the wider landscape or townscape.</p>
Kevin Martin, St Annes Town Council	Yes, new developments	Comment noted. The SPD
Alex Hazel, Environment Agency	<p>The SPD should include the following guidance:</p> <ul style="list-style-type: none">• Developers should incorporate pollution prevention measures to protect ground and surface water. The latest Pollution Prevention Guidance is	Comments noted.

	<p>available at https://www.gov.uk/guidance/pollution-prevention-for-businesses.</p> <ul style="list-style-type: none"> • Where applicable, prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from parking / servicing areas should be passed through an oil interceptor designed and constructed to have a capacity and details compatible with the site being drained. It should be noted that vehicle washdowns and detergents should not pass through oil separators and should be drained instead to foul sewer or sealed system. • Recommend that car parking provisions on larger schemes are 'designed' by landscape architects and should include amenity landscaping with inclusion of SuDs features and green infrastructure. Avoid the creation of large 'sterile' areas. 	<p>The issue of SuDS is cross referred in the Draft SPD to the Draft Flooding, Water Management and Sustainable Urban Drainage Systems (SuDS) SPD</p> <p>The requirement for soft landscaping is incorporated into the Draft SPD</p>
Peter Bull, Little Eccleston-with-Larbreck Parish Council	<p>Make sure that the signage is clear.</p> <p>That parking spaces are large enough.</p> <p>Penalties clearly displayed for any infringements.</p>	Comments noted. Signage and dimensions are requirements of the Draft SPD. Penalties are not normally within reach of planning control
Glenn Robinson, Lancashire County Council Highway Service	Yes	Comment noted
<p>Parking for Cycles and Other Non-Car Vehicles</p> <p>Q9. What areas should guidance in the SPD cover on the matter of parking for non-car vehicles?</p>		
Marcus Hudson, Lancashire County Council	<p>Regarding section 7 – Parking for Cycles and Other Non-Car Vehicles I am pleased to see that you refer to the Gear Change Strategy and its aspirations to increase walking and cycling levels by 2030. In addition to this I recommend that you make specific reference to The Department for Transport's Local Transport Note 1/20 Cycle Infrastructure Design. This note</p>	The Council welcomes LCC's helpful comment signposting detailed national guidance, reference to which has been incorporated into the SPD.

	provides prescriptive and ambitious guidance in terms of implementing new infrastructure. In particular, I recommend referencing requirements set out in chapter 11 (Cycle Parking and other Equipment) as guidance to address the issues outlined in sections 7.1 -7.6 inclusive.	
Chris Hibbert, Henco	<p>As an example, we have installed a number of parking shelters on developments over the last 10 years. Clients always laugh when we carry out the installation, well aware that no one in the building will ever cycle to work due to the nature of their business and ask why we are doing it – ‘because it’s a planning condition’. The structures then serve as glorified smoking shelters.</p> <p>Out of town centres, a lack of “generous, convenient and usable cycle parking” isn’t the problem with low numbers of journeys by bicycle. Distinction needs to be made between town centre and out of town/commercial developments. Certain occupier types gravitate to business parks generally for their convenience/proximity to arterial routes and because the nature of their business requires frequent car/van movement. Parking happens at the end of a journey, to start with, more focus needs to be put on improving cycle lanes/infrastructure in the borough to stand a chance of increasing journey numbers by bicycle.</p>	It is not accepted that staff should be prevented from choosing to cycle to work on new development sites because of lack of suitable provision for them. This approach is fundamentally contrary to Local Plan and national policy, including the Gear Change strategy
Kevin Martin, St Annes Town Council	Not sure	
Alex Hazel, Environment Agency	We would recommend greater emphasis on quick wins, such as promoting cycling and providing suitable facilities and infrastructure	Comment noted
Peter Bull, Little Ecclestone-with-Larbreck Parish Council	These should be clearly signposted, and Penalties clearly displayed for any infringements	Noted

Glenn Robinson, Lancashire County Council Highway Service	Will need to be agreed on a case-by-case basis	This applies to all aspects of parking, in line with the flexible approach of Policy T4. However, the provision of a standard to form a starting point is considered beneficial and in line with national policy and guidance.
<p>Electric Vehicle Charging</p> <p>Q10. What specific matters should the SPD cover regarding electric vehicle charging?</p>		
Chris Hibbert, Henco	<p>Again, the requirement should focus more around ducting/infrastructure only to, to future proof sites and allow for occupier/user charging point installations as required if points at spaces adjacent to/direct from the building are not possible.</p> <p>Ownership of asset issues as discussed above will come into play if a developer is required to carry out the full installation.</p>	Installation of EV charging points is required by the Building Regulations. The SPD cross-refers to the requirements and provides guidance on design issues resulting
Peter Bull, Little Eccleston-with- Larbreck Parish Council	Perhaps advice pointing out where subsidies for installation at residential homes can be found'	Installations are provided by many competing suppliers of vehicles; it would not be appropriate for the Council to direct potential purchasers to specific schemes.
<p>Travel Plans, Transport Assessments and Transport Statements</p> <p>Q11. What local guidance could the Council provide on Travel Planning that would assist applicants?</p>		
Kevin Martin, St Annes Town Council	Not sure	
Peter Bull, Little Eccleston-with- Larbreck Parish Council	<p>Clear and concise website advice.</p> <p>Keep it clear in understandable English.</p> <p>Do not use planning waffle.</p>	Comment noted. The use of some planning terminology has been unavoidable, reflecting legislation and national policy.

Glenn Robinson, Lancashire County Council Highway Service	Needs to be directly related to the development and appointment of a Travel Plan Co-ordinator is a key element.	Comment noted
Q12. What thresholds should the Council set for Travel Plans, Transport Statements and Transport Assessments?		
Chris Hibbert, Henco	Completing a Transport Assessment during some applications of speculative developments is not always possible as the end user/occupier of the scheme has not yet been identified. Again, this should be looked at on a case by case basis.	The PPG test is “significant amounts of movement”. The SPD makes clear that the level of information required will be that needed for the Highway Authority to establish whether the application is acceptable. Where information cannot be supplied, the Highway Authority will need to make a judgement based on the information that is available. This might involve the imposition of planning conditions to control any unknown impacts.
Kevin Martin, St Annes Town Council	Connectivity	Unclear what this comment means or how it applies to the question
Peter Bull, Little Eccleston-with- Larbreck Parish Council	All those stated	Comment noted
Glenn Robinson, Lancashire County Council Highway Service	[Provided table of threshold sizes]	The Council has incorporated these thresholds into the SPD (with expanded definitions of uses for clarity)

SEA Screening Consultation

The Council will request a Screening Opinion as to whether Strategic Environmental Assessment will be required to meet the requirements of the SEA Regulations. Once the results of the screening have been completed, they will be added to this section of the document.



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