

Summary of Representations Made Under Regulation 13 to the Draft Provision of Parking on New Developments SPD

The consultation on the Draft SPD resulted in responses from 13 consultees. The points raised in representation are set out below and the Council's response is shown in the right hand column, including reference to any proposed changes that will be reflected in the adoption statement. The responses are ordered in accordance with the structure of the Draft SPD, with the chapter headings set out for reference.

Consultee	Key text from representation	Council Response
General		
Benjamin Rogers – Lancashire County Council (Lead Local Flood Authority)	please note that the LLFA has no comments to make on the Draft Provision of Parking on New Developments Supplementary Planning Document (SPD).	Comment noted
Christine Ibbotson	I can't say I have read all this nor understood the details. It looks like the document has been through many experts before us!	Comment noted
Christopher Carroll – Sport England	Thank you for consulting Sport England on the above draft Supplementary Planning Document (SPD). Sport England have no objections to the document. Although, Sport England have no specific comments on the content of the draft SPD we would like to make you aware of our statutory role and the following guidance. Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the	Support welcomed. Comments noted. The SPD will support the objectives mentioned.

	<p>right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p>	
Nicola Elsworth – Homes England	<p>Homes England does not wish to make any representations on the above consultation. We will however continue to engage with you as appropriate.</p>	Comment noted
Sharon Jenkins – Natural England	<p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p>[see relevant section]</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment</p> <p>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 required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p>	<p>Comment noted: issues considered in relevant section</p> <p>The Draft SPD has been subject to screening as to whether SEA is required, and found to not require it.</p>

<p>Paul Walton – PWA Planning for Dixon Grange/AFC Fylde</p>	<p>PWA Planning is retained by Dixon Grange and AFC Fylde to submit formal representations in respect of the consultation on the Draft Provision of Parking on New Developments Supplementary Planning Document (SPD). Dixon Grange Limited and the owners of the majority of the Mill Farm Sports Village, which forms part of strategic allocation MUS3 of the Fylde Local Plan and is recognised as a ‘Mixed Use Development Site’. The ownership includes Mill Farm sports stadium, which is home to AFC Fylde and is the largest stadium within the Borough.</p>	<p>Comment noted</p>
<p>Rachel White – NJL Consulting for Persimmon Homes Ltd</p>	<p>These representations have been prepared by NJL Consulting on behalf of Persimmon Homes (North West) (‘Persimmon’) in response to the publication of the Draft Provision of Parking on New Developments Supplementary Planning Document (SPD) under Regulation 12 and 13 consultation.</p> <p>The Draft SPD is intended to provide further guidance on the requirements for parking on development sites set out with the adopted Development Plan, in this case the Fylde Local Plan 2032 (incorporating Partial Review) which was adopted by the Council on 6th December 2021. The Provision of Parking on New Developments SPD will supersede the existing adopted standards which are the Lancashire County Council Joint Lancashire Structure Plan Parking Standards (2005).</p> <p>These representations provide specific responses to the relevant requirements set out within the Draft SPD, with a specific focus on the design, dimensions and layout of parking. Persimmon has a number of concerns regarding the parking standards outlined within the Draft SPD. It is Persimmon’s view that the document requires several modifications w for the document to be sound. The following section provides comments on the relevant section of the Draft SPD.</p> <p>Summary This representation has been prepared by NJL Consulting on behalf of Persimmon in response to the publication of the Draft Provision of Parking on New Developments Supplementary Planning Document (SPD) under</p>	<p>Comments noted: the specific matters are considered in the individual sections</p>

	<p>Regulation 12 and 13 consultation. The Company has strong concerns about the soundness of the parking standards set out in the Draft SPD. The representations demonstrate the Draft SPD has a fundamental misunderstanding of Part M of the Building Regulations, average UK car dimensions and high-quality highways design solutions, which Persimmon objects to. This is in addition to conflicts with the adopted Local Plan which refers to the reduction in dependence on the private car as a general principle of good design (please refer to Strategic Policy GD7). The Draft SPD, however seems to contradict this principle by seeking to increase hardstanding, and therefore promotes the reliance on the private car. This requirement to increase hardstanding within the Draft SPD further conflicts with the Council's ambitions to integrate landscaping within new development sites, in particular relation to highways to provide additional benefits (please refer to Strategic Policy ENV1). It is therefore Persimmon's firm view that the suggested modifications to the Draft SPD seek promote both sustainable transport and good design in accordance with the recently adopted Local Plan. For justification, a summary of our rationale is provided below:</p> <ul style="list-style-type: none">• Facilitation of EV charging points on all forms of residential dwellings;• Recommendation of appropriate forms of cycle storage;• Parking dimensions based on average UK car dimensions, MfS guidance and Lancashire County Council standards that can appropriately integrate landscaping; and• Individual requirements of the three separate categories of Part M of the Building Regulations. <p>We trust these comments are helpful in considering the soundness of the Draft SPD, and provide valuable insight for making modifications to the SPD.</p>	
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<p>Robert Taylor – Lancashire County Council Schools Planning Team</p>	<p>Lancashire County Council's School Planning Team welcome the opportunity to contribute to the Supplementary Planning Documents Consultation – June 2023. We recognise the value of engaging with Local Councils at the earliest stage of their plans to ensure the future needs of education are highlighted and documented within the local plan policies. The value of local knowledge can help to define and shape the future of local communities, ensuring the right level of infrastructure is achieved to meet the growth of housing and employment.</p> <p>The School Planning Team has worked closely with colleagues at Fylde Council over a number of years as they develop Local Plans, Strategic Policies and Supplementary Planning Documents to ensure the infrastructure requirements are included within the policies to support the successful delivery of sustainable housing development, including the allocation of land for new school provision.</p> <p>The School Planning Team also request that as part of the Supplementary Planning Document Consultation Fylde Council take into consideration the new LCC School Site Criteria as part of infrastructure delivery especially in relation to Biodiversity Net Gain which is a new statutory requirement from November 2023. Additionally, the site must not be within flood zone 2 or 3 or subject to ground water flooding.</p> <p>With reference to the Draft Provision of Parking on New Developments Supplementary Planning Document (SPD) Lancashire County Council would welcome the opportunity to work with Fylde Council to achieve the following:</p> <ul style="list-style-type: none"> • Suitable adopted highway to be provided to the boundary of the school entrance. • Safe walking/cycling routes from the surrounding housing and be within reasonable walking/cycling distance. 	<p>The relevant section of the School Site Criteria are quoted (without reference) further on in the representation</p> <p>The following bullets are from the School Site Criteria</p> <p>This falls outside the scope of what the SPD will cover.</p> <p>Provision of these falls outside the scope of the SPD, however their availability will be a consideration in Travel Plans, which will be a consideration in the determination of the parking</p>
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	<ul style="list-style-type: none"> • Suitable road access for construction traffic and allow for pupil drop off without disruption to the road network. • Road access should not be from single access estate roads, a through route is strongly preferred. • Public transport nearby to support green travel objectives. <p>Lancashire County Council's School Planning Team wish to thank Fylde Council for the opportunity to engage in this process. We look forward to further engagement in the future to work towards all new schools being carbon neutral and meeting LCC School Site Criteria which includes environmental impact mitigation, supporting Fylde Council's Climate Emergency Review.</p>	<p>required and are reflected in the parking standards.</p> <p>Pupil drop off areas can be added to the parking standards</p> <p>Road access is beyond the scope of the SPD.</p> <p>Public transport should be considered through Travel Plans, as noted in the SPD</p>
Melanie Lindsley – The Coal Authority	On the basis that the area does not lie on the coalfield the Planning team at the Coal Authority have no comments to make on the draft SPD's.	Comment noted
Glenn Robinson – Lancashire County Council Highways	Generally supportive of the document.	Support welcomed
Introduction		
	No responses to this section	

Policy and Guidance Review		
<p>Christopher Carroll – Sport England</p>	<p>Sport England, in conjunction with Public Health England (now Office for Health Improvement and Disparities (OHID)), has produced ‘Active Design’ (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of 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>Active Design has been added to the list of documents reviewed. The relevant matter throughout the document is the provision of cycle parking to encourage active travel; the SPD includes specific requirements for cycle parking related to all developments.</p>
Overall Approach to Parking Requirements		
<p>Paul Walton – PWA Planning for Dixon Grange/AFC Fylde</p>	<p>Having reviewed the draft SPD, Dixon Grange / AFC Fylde query whether the MUS3 strategic site should be considered as an area that is rural and of low accessibility. Mill Farm Sports Village is shown on the mapping at Figure 4 of the SPD as adjacent to an area of ‘Moderate Accessibility’. However this designation appears somewhat selective and does not appear to reflect the fact that the location was deemed a sustainable location for development at the time of allocation within the Local Plan in 2018. As part of previous planning approvals for Mill Farm Sports Village, the owners have also made financial contributions towards improvements to the provision of public transport. Furthermore, transport assessments submitted within previous</p>	<p>The identification of a site as being within the area described as low accessibility for this document does not imply that the site is not a sustainable location. The Mill Farm site is acknowledged by the Council in the Local Plan as a sustainable location for the uses allocated. The designation here is solely for the purpose of determining whether a site is sufficiently accessible to justify reductions in the car parking standards. As noted by the respondent, the site</p>

	<p>planning applications have proven the land accessible by a range of non-car modes; a position which has been accepted by the decision-taker on each occasion. The Mill Farm Sports Village should therefore be recognised as being of moderate accessibility, at worst.</p>	<p>lies marginally outside: reduced parking requirements would not be appropriate.</p>
<p>Parking Standards</p>		
<p>Christopher Carroll – Sport England</p>	<p>Limited information can be found within the draft SPD with regards car parking requirements for new sports clubs and to serve new playing field sites. It is essential therefore that the SPD reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document, <u>where car parking is specifically mentioned in paragraphs 13 and 53</u>. The document can be downloaded via the following link: https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</p> <p>[Paragraph 13 of the Guidance document states:</p> <p><i>13. If a local planning authority is in any doubt as to whether a proposed development will prejudice the use of any part of a playing field it should consult Sport England. This will allow Sport England, in discussion with the relevant sport’s national governing bodies, to take an informed view of the potential impact of the proposal. Examples of development which is likely to prejudice the use of a playing field include:</i></p> <p>...</p>	<p>The draft SPD follows previous practice and sets out a requirement in the parking standard for “Class F2 Indoor or outdoor swimming baths, skating rinks, and outdoor sports or recreations not involving motorised vehicles or firearms, with 500 or fewer seats or standing spaces”, in accordance with the Use Classes Order (as amended), but distinguishing from stadia with over 500 seats/spaces in order that their particular requirements are addressed. The SPD does not go further into how the standard might be met on a range of types of development site. The response does not suggest that the standards set are inappropriate.</p> <p>The SPD is fully in line with paragraphs 98 and 99.</p> <p>In respect of paragraph 13 of the Guidance document, the SPD is in line with the response. Although the SPD does not mention these circumstances specifically, the Local Plan has an overarching requirement that the number of parking spaces on a site should not normally be reduced.</p>

	<ul style="list-style-type: none"> • <i>development affecting off-site facilities which support the use of the playing field, e.g. off-site changing or parking facilities.</i> <p>[Paragraph 53 states:</p> <p><i>Can car parking meet with Exception 2? [Exception 2 to the general policy of resisting development of playing fields: The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.]</i></p> <p><i>53. Yes, provided it is clearly demonstrated as being necessary for improving access to the playing field for sporting use, rather than for other non-sporting uses, e.g. where a car park intended for wider school use impinges on a playing field.]</i></p>	<p>The SPD does not cover detail requirements for specific land uses, other than in providing an overall standard. Any proposal would need to comply with the standards. The guidance does not compromise other policies which seek to retain playing fields in accordance with national policy and Sport England’s guidance.</p>
<p>Paul Walton – PWA Planning for Dixon Grange/AFC Fylde</p>	<p>Dixon Grange / AFC Fylde nevertheless support the intention of Fylde Borough Council to adopt the proposed minimum car parking standards in less accessible areas. Of particular relevance is the standard being proposed for Use Class F2 outdoor sports stadia with more than 500 seats or standing spaces, at a rate of 1 parking space per 10 seats. It is noted that this is a considerably greater level of provision than was set out as a ‘maximum’ standard within the Lancashire County Council Joint Lancashire Structure Plan Parking Standards (2005), which the SPD is set to supersede. The use of maximum standards, as per the Structure Plan are clearly now inconsistent with the National Planning Policy Framework, which at Paragraph 108 clearly states that they should only be used in instances where there is clear and compelling justification. It is accepted that such circumstances do not exist within the Borough of Fylde and it is right to therefore seek to adopt minimum standards.</p> <p>However, it is considered that the parking rate could safely be reduced within the SPD to a minimum rate of 1 space per 15 seats in circumstances where the stadia implement measures to actively manage car parking during</p>	<p>Comments noted</p> <p>The Council will apply standards flexibly based on the circumstances of the site and development proposed, as set out in Chapter 3 of the SPD. This</p>

	<p>events and promote sustainable modes of travel to staff and visitors (via a Car Parking Management Strategy). Such an approach is considered wholly consistent with the National Planning Policy Framework and Local Plan Policy T5, which together promote flexibility towards parking provision with minimum levels, that are based upon the use and local context of a particular development.</p> <p>Otherwise, the application of the minimum standards approach is acknowledged and supported. The corollary of this is that parking requirements above these minimum standards should not be required as part of the planning process and any provision in excess of the minimum standards should be a matter for the developer / operator.</p> <p>It is trusted that these representations will be attributed weight in the final decision on the SPD, taking into account the role of Dixon Grange / AFC Fylde, as the operator of the largest stadium within Fylde.</p>	<p>could include circumstances where a detailed management strategy controlled by a planning condition are imposed, where the Council considers this to be suitable. It is not considered appropriate for this to be provided for within the standard, however.</p> <p>The Council may, on occasion, require parking above the minimum standards where there remains conflict with Local Plan policies.</p>
<p>Robert Taylor – Lancashire County Council Schools Planning Team</p>	<p>With reference to the Draft Provision of Parking on New Developments Supplementary Planning Document (SPD) Lancashire County Council would welcome the opportunity to work with Fylde Council to achieve the following:</p> <ul style="list-style-type: none"> • Safe walking/cycling routes from the surrounding housing and be within reasonable walking/cycling distance. <p>...</p> <ul style="list-style-type: none"> • Suitable road access for construction traffic and allow for pupil drop off without disruption to the road network. <p>...</p>	<p>Provision of these falls outside the scope of the SPD, however their availability will be a consideration in Travel Plans, which will be a consideration in the determination of the parking required and are reflected in the parking standards.</p> <p>Drop off zones can be added to the parking standards (already included for nurseries).</p>

	<ul style="list-style-type: none"> • Public transport nearby to support green travel objectives. 	Public transport should be considered through Travel Plans, as noted in the SPD and reflected in the parking standards.
Design, dimensions and layout of parking		
Andrew Leysens – United Utilities	<p>In accordance with our comments to the Draft Flooding, Water Management and Sustainable Urban Drainage Systems (SuDS) SPD, we are encouraged by the requirements in the draft Parking SPD to have all parking constructed using pervious paving. We would encourage you to include a specific section regarding the paving over of front gardens. Within our response to the Draft Flooding SPD, we included the following wording, which we would encourage you to repeat in your draft Parking SPD:</p> <p>‘The paving over of gardens has a significant impact on public sewers. The paving over of gardens can increase the flow of rainwater to the public sewer rather than allowing it to naturally infiltrate to ground. This increases the flow of water to the public sewer, which increases the likelihood of flooding and the likelihood that a public sewer will spill into a waterbody. The combined effect of many properties paving over gardens places a huge strain on our sewers during storm events.</p> <p>In the first instance, we encourage you to not pave over your garden areas. However, if you do, we request that you do all you can to ensure that surface water can continue to drain via a permeable surface and / or is directed to a permeable surface such as flower beds. In some instances, you may require planning permission. Further advice can be found here.</p> <p>In constructing any new householder project, including any new parking, we would encourage you to incorporate rain gardens. Guidance on rain gardens can be found here and here.’</p>	Whilst the advice is helpful, the level of detail here is excessive for the SPD which relates to parking. Elements of the text in the response can be used to provide some assistance, with full details included in the Flooding, Water Management and Sustainable Drainage Systems SPD.

Under the heading of Landscaping and Materials we would also request that you include the following wording.

‘When bringing forward new parking proposals, you will be required to integrate your landscaping proposals with the strategy for sustainable surface water management. Every opportunity should be taken to include source control and slow the flow of surface water through the incorporation of blue and green Infrastructure, which can make a positive contribution to the quality of the public realm.

The evaluation of such surface water management opportunities must be undertaken early in the design process. The design and landscaping of the site should be intrinsically linked to opportunities for surface water management improvements which could be achieved through a variety of features including:

- permeable surfacing;
- bioretention tree pits;
- rain gardens;
- soakaways and filter drainage; and
- retrofitted swales.

Applicants are advised to refer to the Susdrain website which includes a range of case studies that show examples of how SuDS have been implemented in the urban environment. Interesting examples, which demonstrate how run off can be captured by landscaping in urban environments, include:

- [Grey to Green Phase 1, Sheffield](#);
- [Crescent Gardens SuDS project, High Road, Haringey](#); and
- [Derby by Midland Station, retrofit tree pits, Derby](#).

Applicants can also refer to ‘[Designing Rain Gardens: A Practical Guide](#)’ produced by Urban Design London, which includes some excellent imagery

	of how surface water management principles have been integrated with landscaping in urban environments in England.’	
Christopher Carroll – Sport England	<p>Sport England, in conjunction with Public Health England (now Office for Health Improvement and Disparities (OHID)), has produced ‘Active Design’ (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of 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>	Comment noted. The design requirements set out in Chapter 5 of the SPD follow the approach set out in the Active Design document, as far as is directly relevant to the SPD. In particular, the requirement for clearly identifiable space for pedestrian movement within, across and around parking areas of all types including within domestic curtilage follows the approach taken in the Active Design document.
Sharon Jenkins – Natural England	<p>Green Infrastructure</p> <p>This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area. The National Planning Policy Framework states that local planning authorities should ‘take a strategic approach to maintaining and enhancing</p>	The SPD includes requirements for landscaping including trees within car parking areas.

	<p>networks of habitats and green infrastructure'. The Planning Practice Guidance on Green Infrastructure provides more detail on this.</p> <p>Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities. There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none">• green roof systems and roof gardens;• green walls to provide insulation or shading and cooling;• new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). <p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans. Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".</p> <p>Biodiversity enhancement</p> <p>This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 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</p>	<p>The SPD's requirements for trees in car parking areas will provide shade to moderate potential urban heating effects</p> <p>This SPD does not concern built structures so these comments are not relevant.</p>
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	<p>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>For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> <p>Other design considerations</p> <p>The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).</p>	<p>The SPD requires landscaping in association with parking areas, appropriate to the development considered.</p> <p>The SPD recognises the impact of lighting whilst requiring its provision to ensure its full coverage in the interests of security and amenity.</p>
Rachel White – NJL Consulting for Persimmon Homes	<p>In relation to the basic dimension of a parking space, the SPD at paragraph 5.8 sets out '2.5m x 5.0m'. This is in addition to 0.3m of the additional width being provided where there is space to the side. Persimmon fundamentally disagrees with this proposed parking dimension in accordance with the Part M of the Building Regulations and Manual for Streets (MfS) guidance which establish a standard parking space dimension of '2.4m x 4.8m'. Moreover, the average car length in the UK is 4.4m, with estates, saloons, and MPVs measuring circa 4.7m, which all comfortably fit within Part M standards. It is</p>	<p>The dimension used for a standard parking space accords with the Council's current practice for marking its own spaces on public car parking areas. The dimensions used in Part M are the minima required for compliance with Building Regulations. However, it is widely understood that cars have been becoming larger; the last model Ford Mondeo to be produced was 4.87m</p>

	<p>Persimmon's view that introducing parking bays at 2.5m x 5m plus an additional 0.3m of hardstanding to the end of bays would have a detrimental impact to the street scene, particularly in the case of terraced dwellings. This design approach would severely restrict opportunities for incorporating soft landscaping, and overall result in poor design outcomes.</p>	<p>long, longer than the 4.8m referred to. Based on data provided later in the representation, the average length of an SUV is 4.79m: therefore 50% of SUVs are 4.79m long or longer, meaning that a very significant proportion of SUVs are too long for a 4.8m spacing. As SUVs now represent around 40% of vehicles on the road, continuing to base the size of spaces on 4.8m would be inadequate.</p> <p>Increasingly the width of vehicles has led to inadequate space to open vehicle doors: a Land Rover Discovery Sport for instance allows just 16.5 cm of space on either side within a 2.4m space. The Council's decision to marginally enlarge the required spaces is justified.</p> <p>The representation misstates the requirement where it refers to "an additional 0.3m of hardstanding to the end of bays": additional hardstanding is required to the side, to ensure that occupants are able to exit vehicles without trampling adjacent soft landscaping, which otherwise would be inevitable.</p> <p>Whilst the requirement inevitably requires marginally more space, good design requires that developments are appropriately landscaped. Development densities should not be so high so as to make poor design inevitable. Where space for parking and soft landscaping cannot be found within a design, a complete redesign with that requirement central to the proposal should be undertaken.</p>
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	<p>Paragraph 5.11 of the SPD goes onto establish the dimensions of parallel parking spaces at '2m x 5.6m'. It is Persimmon's firm view that the dimension of parallel parking spaces should adhere to required standards of '2m x 6m' with splayed ends, as outlined in Manual for Street guidance.</p> <p>Suggested Modification: The requisite parking space dimensions should be consistent with Part M of the Building Regulations and MfS guidance. For standard parking spaces this is '2.4m x 4.8m', with parallel parking spaced at '2m x 6m.</p> <p>It is understood that Paragraph 5.18 refers to Part M of the Building Regulations regarding driveways of individual residential dwellings and pedestrian access. In the first instance, Persimmon highlight that the Part M of the Building Regulations is divided into 3 separate categories:</p> <ul style="list-style-type: none"> • M4(1) Visitable dwellings; • M4(2) Accessible and adaptable dwellings; and • M4(3) Wheelchair user dwellings. <p>The three categories have varying requirements that Persimmon comment, as follows: M4(1) Visitable dwellings For M4(1) the requirement for a driveway would be to allow pedestrian access (0.9m) past a parked car (2.1m) to the principal entrance (please refer to Appendix 1) <i>[this shows an extract of an NHBC document showing what appears to be an earlier version of Part M]</i>, which equates to a 3m width driveway for a single drive. A double width driveway would therefore be a 2.4m standard parking dimensions plus an additional 3m that totals 5.4m. It should be understood that the majority of dwellings fall under this category.</p> <p>M4(2) Accessible and adaptable dwellings For M4(2) dwellings the requirement would be to provide as per M4(1) above, but to allow space for future widening of one of the standard parking bay to 3.3m width. Therefore, a double would be increased from 5.4m to 5.7m to allow for</p>	<p>Comment noted. The required dimension is altered to 2m x 6m for the final SPD.</p> <p>The SPD sets out the general minimum requirement for private dwellings. The specific additional requirements of M4(2) and M4(3) are not included; reference to the Part M document will be sufficient.</p> <p>The SPD makes a requirement for the pedestrian approach route to be clearly demarcated and, as such, not part of the drive. It is required to be 0.9m wide. The approach suggested by the respondent, whereby the pedestrian route is combined into the driveway, represents poor design that would result in cars parked over the space intended to provide the pedestrian width, and in consequence no apparent pedestrian route. Part M does not sum the 0.9m requirement with 2.1m and does not refer to a 3m drive.</p> <p>The widths of standard parking spaces, including the Council's 2.5m, only provide sufficient room</p>
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	<p>future widening. M4(3) Wheelchair user dwellings For M4(3) dwellings the requirement is to provide a standard parking space at 2.4m, plus an additional 1.2m width to one side and the rear. This equates to 3.6m x 6m for a single drive, and a 6m width for a double drive. In view of the above, it is evident that the Draft SPD demonstrates a fundamental misunderstanding of AD Part M of the Building Regulations. The Draft SPD proposes a driveway width of 3.7m for a single and 6.3m for a double. This is in excess of M4(3) dwelling standards which cater for impaired movement and would assume that all dwellings across a development are for wheelchair users. Given that the majority of dwellings would be classed as M4(1), Persimmon object to the proposed requirements for individual residential driveways at Paragraph 5.18 of the Draft SPD.</p> <p>It is also important to note that Part M of the Building Regulations does not require 0.9m pedestrian access to be of a different material to the driveway. This is a further misunderstanding of the Building Regulations within the SPD. To reiterate, the requested standards would result in a street scene and design that is overly dominated by hard surfacing, which would result in poor quality design. This would inherently conflict with the adopted Local Plan aspirations to prioritise the needs of non-motorised users and reduce the dependence on private cars set out in Strategic Policy GD7 'Achieving Good Design in Development.' Moreover, Strategic Policy ENV1 'Landscape' considers that highways can be effectively designed with the integration of landscaping such as tree planting to offer additional benefits from noise and pollution (Local Plan, Page 182).</p> <p>Suggested Modification: The proposed standards of individual residential dwellings and pedestrian access should accurately reflect the three categories of Part M of the Building Regulations. The SPD should also note that the majority of dwellings fall under Part M4(1), and therefore the Council would largely expect to see a 3m width driveway for a single drive and a 5.4m width for a double drive.</p>	<p>for car doors to be opened if they adjoin another similar space. Therefore, the additional 0.3m of space on either side of the whole parking area is essential: it would be inappropriate if this were soft landscaping. However, where the driveway adjoins the pedestrian route, this is not needed.</p> <p>The SPD sets out a driveway width of 5m for two spaces, plus a separate pedestrian access of 0.9m, with 0.3m edge buffer to the drive added where necessary (Fig. 9 of the SPD).</p> <p>The provision of the clearly defined pedestrian route is a requirement of the SPD, providing detail on the application of Local Plan Policy GD7.</p> <p>On the contrary, it would ensure that the interests of pedestrians are prioritised, as stated in the policy.</p> <p>The Council does not accept that the SPD should be modified in line with the text provided.</p>
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	<p>Paragraph 5.24 of the Draft SPD sets the requirements for new garages whether on a new development site or within the curtilage of an existing property, as follows:</p> <ul style="list-style-type: none"> • ‘Minimum internal dimensions 6.4m x 3.0m for a single garage; • Minimum internal dimensions 6.4m x 5.5m for a double garage; • Any door at the side intended to open inwards will need to be at least 5m from the garage door (measured internally); • Where a parking space is to be provided in front of the garage, a buffer of 0.9m will be required between the garage and the space; • Doorway width for a single garage to be a minimum of 2.5m; • Doorway width for a double garage to be a minimum of 5m. Where two individual doors are to be fitted, they should each be a minimum 2.5m wide.’ <p>In consideration of Lancashire County Council parking standards and MfS guidelines, Persimmon views the proposed internal length of 6.4m for a single and double garage to be excessive. The aforementioned Policy and guidance recommend an internal length of 6m for a garage to be counted as a parking space, which is accepted to allow room for a parked car circa 4.7m length, as well as cycle storage.</p> <p>As previously established, the average UK car length is 4.4m (4.7m for saloons / estates / MPVs and 4.79m for SUVs), therefore the proposed 0.9m buffer between a parking space and a garage door is disproportionate. A 5.5m overall drive length to the front of a garage is substantial space to operate an ‘up and over’ garage door (typically 0.7m) and a parking car (based on average car sizes).</p> <p>In addition to the above, based on the average UK car width of 1.82m (smaller cars circa 1.62m, saloons / estates circa 1.83m and SUVs / MPVs circa 1.95m) the proposed minimum garage door width of 2.5m is excessive. All aforementioned car type widths comfortably pass through a standard garage door opening of 2.26m (structural opening).</p>	<p>The internal length proposed is consistent with the dimension required by the St. Anne’s on the Sea Neighbourhood Development Plan, and therefore already required in that part of the Borough.</p> <p>The zone required is not solely to allow for the opening of the garage: it is to allow for pedestrian access, in particular so that access is maintained to the rear of the property for bins and cycles. The text of the SPD has been revised to make clear it is for that purpose (so would not apply for instance when the gate to the rear is between the dwelling and the garage).</p> <p>A garage can only be considered as a parking space if it is easy to use on a daily/casual basis. Close fitting doorway spaces discourage this type</p>
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	<p>Suggested Modification: The proposed garage standards to be amended to reflect average UK car dimensions in accordance with Lancashire County Council and MfS guidance.</p> <p>As established above, the proposed parking dimension standards create over domination of hardstanding with limited opportunity for soft landscaping. As a result, the 1m separation buffer recommendation at Paragraph 5.45 is not feasible. The below extract taken from the SPD at Page 50 shows 6no. parking spaces which is only sufficient provision for 3 no. 2 to 3 bedroomed homes. Notwithstanding, the illustration depicts 5no. properties. Therefore, if two properties are subtracted (or when four additional spaces are added along with landscaping), it is evident that the parking and landscape areas are considerably wider than the dwellings themselves. This demonstrates a clear design flaw and an inefficient use of land.</p> <p>Persimmon, however would welcome the 1m landscape buffer if a flexible view is taken on dwellings within a terraced form, and a provision of 150% parking is acceptable.</p> <p><i>[reproduces Fig. 15 from p50 of the Draft SPD]</i></p>	<p>of use. The requirement provides for a comfortable entrance but is not excessive.</p> <p>As set out in the Parking Standards in Table 2, 1-2 bedroom affordable rented housing, and 2-bedroom houses in areas of moderate and high accessibility, have a minimum requirement of 1 space per dwelling. In low accessibility areas, more space would be required to accommodate the same number of dwellings.</p> <p>It is unclear what this means; the minimum standards are set out in Table 2; the Council will apply standards flexibly as stated in Chapter 3 of the SPD, based on the circumstances of the site.</p>
<p>Glenn Robinson – Lancashire County Council Highways</p>	<p>Would recommend reviewing Section 5 so that it is in line with highway standards.</p> <p>Manual for Street on page 111 Fig 8.19 show parallel parking space to be 6.0m as opposed to 5.6m on page 42 (Fig 7) of the draft document.</p> <p>DfT's Traffic Signs Manual Chapter 5 Fig20.3 shows disable bays a 6.6m when parallel.</p>	<p>Comment noted. The chapter has been reviewed.</p> <p>Noted: Fig.7 of the SPD has been amended.</p> <p>Noted: text has been added to set out this requirement</p>

<p>Emily Hrycan – Historic England</p>	<p>We would encourage you to consider the historic environment in the production of your SPD. We recommend that you seek advice from the local authority conservation officer and from the appropriate archaeological staff. They are best placed to provide information on the historic environment, advise on local historic environment issues and priorities, indicate how heritage assets may be affected and identify opportunities for securing wider benefits through the conservation and enhancement of the historic environment.</p>	<p>Comment noted. The Council’s Conservation Officer has recommended the use of studs rather than white lines, and general avoidance of the use of paint, to mark parking spaces on sensitive sites such as within Conservation Areas and the settings and curtilage of Listed Buildings. A short section has been added to the SPD to set this out.</p>
<p>Parking for Cycles and Other Non-Car Vehicles</p>		
<p>Rachel White – NJL Consulting for Persimmon Homes</p>	<p>Parking for Cycles and Other Vehicles</p> <p>Paragraphs 6.4 to 6.7 of the Draft SPD set out standards for cycle storage. As previously established, Persimmon consider that a garage with an internal length of 6m provides sufficient space for cycle storage. This is based on Lancashire County Council parking standards and MfS guidance. For properties without a garage, Persimmon recommend that cycle storage in the form of sheds to the rear garden is the most appropriate, particularly in terraced form. Such a provision can be secured through an appropriately worded planning condition. This approach ensures safe and secure design for occupants.</p> <p>Suggested Modification: The proposed standards should be amended to reflect average UK car dimensions in accordance with Lancashire County Council and MfS guidance.</p>	<p>The respondent does not suggest that there is any issue with the need for provision for cycle parking. The matter of garage dimensions is dealt with in the section concerning Chapter 5 above. The Council accepts that sheds can be an acceptable solution: where a garage is not present, the provision of rear access other than through the dwelling is the most important consideration, and this is reflected in the SPD. No changes needed.</p>

Electric Vehicle Charging		
<p>Rachel White – NJL Consulting for Persimmon Homes</p>	<p>Electric Vehicle Charging</p> <p>In terms of electric vehicle charge points, the Draft SPD establishes at Paragraph 7.12 that the Council, ‘in general will not accept charging points to the attached to the front elevation of a dwelling.’ Persimmon fundamentally object to this as there will be instances of mid-terraced units with no shared path between the front elevation and parking area where this arrangement is necessary and the most appropriate. This is in addition to the case of semi-detached units (with no shared path) where the parking is more central to the dwellings, and therefore it is the most efficient to locate the charging point on the front elevation.</p> <p>Suggested Modification: The proposed wording should be amended to recognise instances where it is most appropriate to locate the EV charge point along the front elevation.</p>	<p>The phrase used “in general...” allows for there to be exceptions where it can be accepted. However, it is likely that terraced units will more commonly have a shared path, and the charging points will be on the other side adjacent to the parking area. In the case of semi-detached dwellings, it is unlikely that the Council will accept parking located centrally in front of a pair of dwellings, and the SPD sets out the expectation for parking to be located towards the side of the plot frontage. No change needed.</p>
Travel Plans, Transport Assessments and Transport Statements		
<p>Robert Taylor – Lancashire County Council Schools Planning Team</p>	<p>With reference to the Draft Provision of Parking on New Developments Supplementary Planning Document (SPD) Lancashire County Council would welcome the opportunity to work with Fylde Council to achieve the following:</p> <ul style="list-style-type: none"> • Suitable adopted highway to be provided to the boundary of the school entrance. • Safe walking/cycling routes from the surrounding housing and be within reasonable walking/cycling distance. 	<p>This falls outside the scope of what the SPD will cover.</p> <p>Provision of these falls outside the scope of the SPD, however their availability will be a consideration in Travel Plans, which will be a</p>

	<ul style="list-style-type: none">• Suitable road access for construction traffic and allow for pupil drop off without disruption to the road network.• Road access should not be from single access estate roads, a through route is strongly preferred.• Public transport nearby to support green travel objectives.	<p>consideration in the determination of the parking required and are reflected in the parking standards.</p> <p>Pupil drop off areas can be added to the parking standards</p> <p>Road access is beyond the scope of the SPD.</p> <p>Public transport should be considered through Travel Plans, as noted in the SPD</p>
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