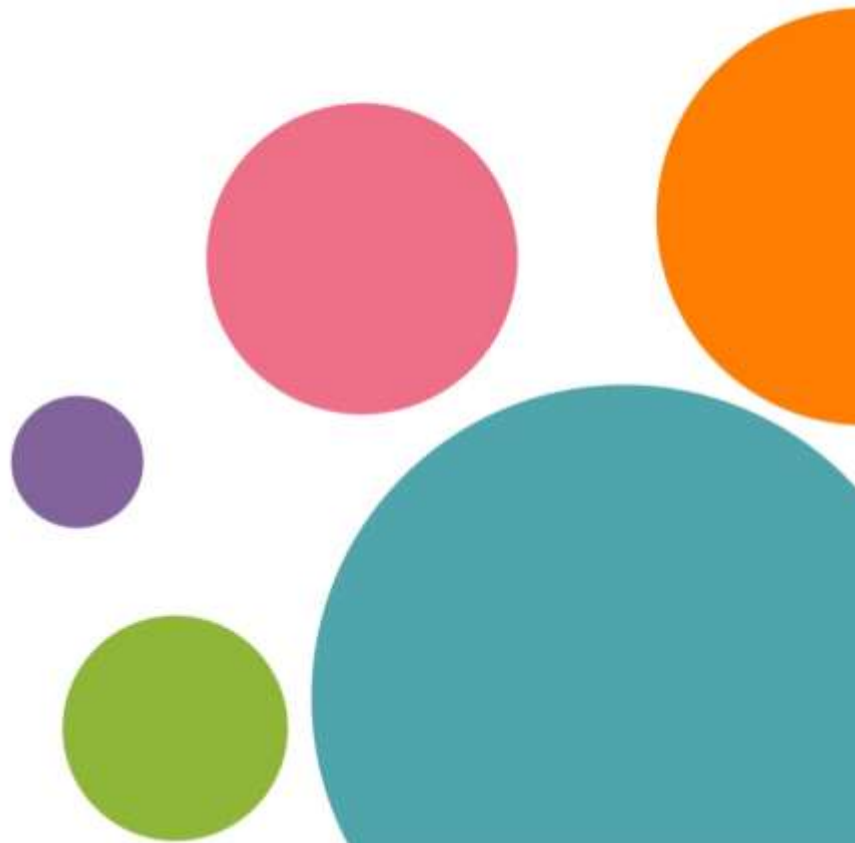
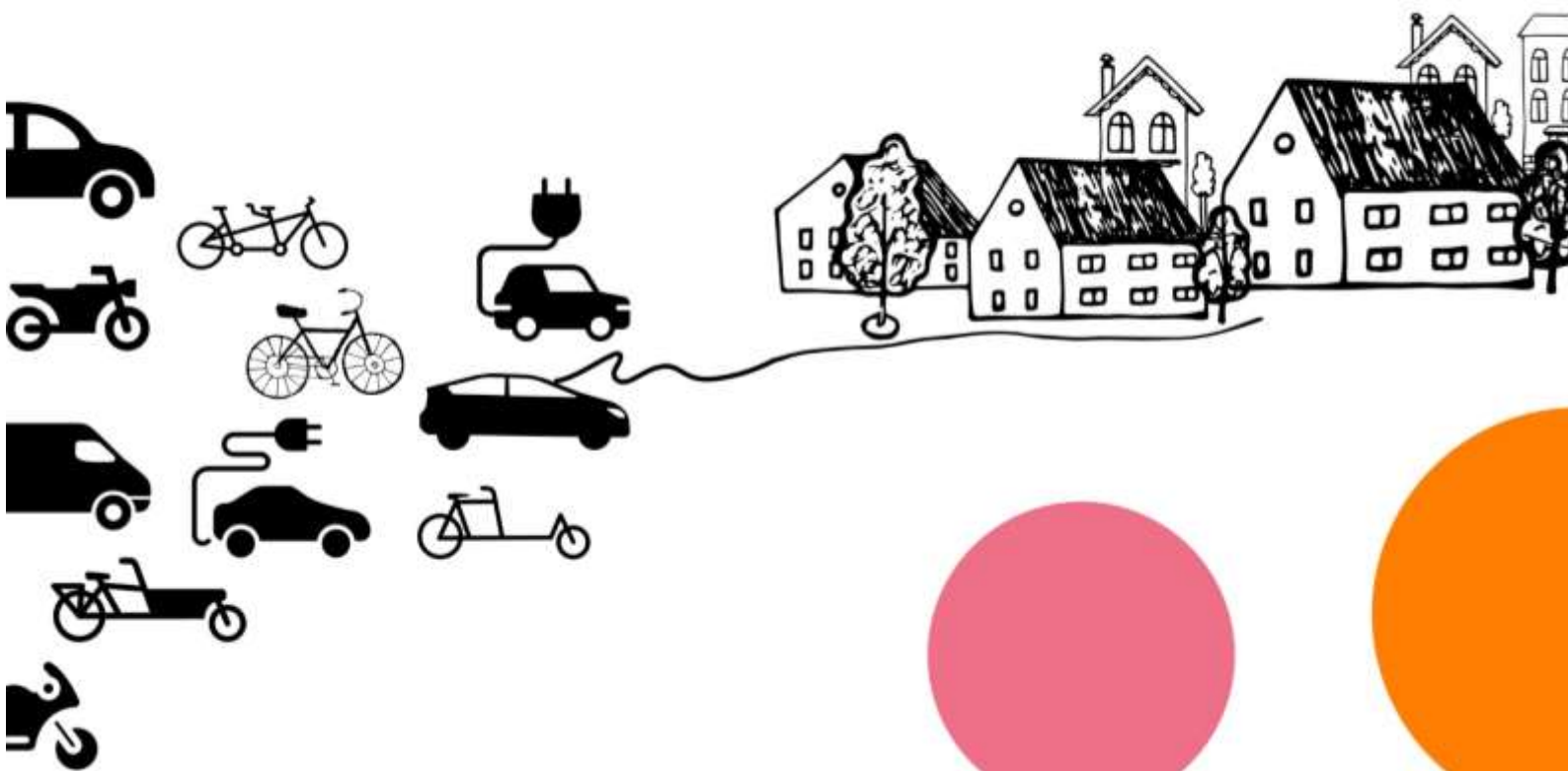


Guildford Borough Parking Standards for New Development Supplementary Planning Document (SPD)

Consultation Statement

March 2023



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1. Introduction

- 1.1 We have prepared this Consultation Statement under Regulation 12 of the Town and Country Planning (Local Development) (England) Regulations 2012.
- 1.2 Under Regulation 12(a) we must prepare a consultation statement before we adopt a Supplementary Planning Document (SPD). The consultation statement must set out:
- the persons the local authority consulted when preparing the SPD;
 - a summary of the main issues raised by those persons; and
 - how we addressed those issues in the SPD.
- 1.3 The Parking Standards for New Development SPD ('the SPD') provides detailed advice and guidance on Policy ID10: Parking Standards for New Development of the Local Plan: Development Management Policies, and Policy ID3: Sustainable transport for new developments of the Local Plan: Strategy and Sites 2015-2034.
- 1.4 For clarity, the SPD was originally named "Parking Standards SPD" and was publicly consulted upon under this title. Following the public consultation, it was renamed "Parking Standards for New Development SPD" to prevent confusion with the other parking-related roles Guildford Borough Council perform relating to on and off-street public vehicle parking.
- 1.5 The SPD sets out Guildford Borough Council's off-street parking standards for non-strategic sites and design guidance for on- and off-street parking provision for all new development.

2. Preparing the draft SPD

- 2.1 The SPD was prepared alongside Policy ID10: Parking Standards for New Development of the Local Plan: Development Management Policies (LPDMP).
- 2.2 The key considerations arising from the Regulation 18 LPDMP consultation which informed the preparation of the draft SPD and the resulting actions are included in Table 1 below.

Table 1. Considerations raised and actions discussed during the initial preparation of the SPD by interested parties

Consideration	Action
A greater range of car parking standards to apply to areas outside Guildford Town Centre	Car parking standards now comprise of maximum residential car parking standards in the town centre, suburban areas and strategic sites, set at different values for different sizes and type of dwelling as well as location. Expected standards are set out for rural and village areas, again varying between dwelling size and type
Standards for Electric Vehicle Charge Points which are futureproofed	Initially included in SPD to enable them to be more easily updated in light of changing circumstances, but upon the introduction of Building Regulations, Policy ID10 now defers to these regulations
Making provision for low-car and car-free development	Included in Policy ID10 with further guidance in SPD
Different standards for long and short stay cycle parking	Initially followed SCC's guidance, but now generally mirror those in the Department for Transport's Local Transport Note 1/20, which includes different standards for long and short stay

Further guidance in relation to secure cycle parking	SPD includes design guidance for different development types
Development of a section for parking for disabled drivers	Included in Policy ID10, with further guidance in the SPD. Cycle parking design guidance also refers to non-standard cycles
Further guidance in relation to car club vehicles	Included in Policy ID10, with further design guidance in the SPD

2.3 Further, direct engagement was undertaken with Surrey County Council (Transport Development Planning Team) and Highways England (Spatial Planning Team) under the Duty to Cooperate of the plan-making process. Engagement was also undertaken with the cross-party panel of Guildford Borough Councillors during the Local Plan Panel sessions.

2.4 The main responses which assisted in finalising the draft SPD are summarised in Table 2 below.

Table 2. Responses from invited parties during review of draft SPD and resulting actions

Response	Action
Include guidance in relation to Purpose-Built Student Accommodation	Guidance included
Desire for minimum parking requirements for Houses in Multiple Occupation (HMOs)	Explanation in SPD as to why standards for HMOs are not included
Desire for increased parking for Doctors, Dentists and Veterinary Practices	Standards changed to 'Individual Assessment'
Reconsider 2.5 bays per 4-bedroomed house in 'Rural & Village' areas	Standard not increased as they are based on observed averages, however these are 'expected standards' therefore there is some flexibility in application
Make reference to rail service provision in paragraph related to 'provision for low car development'	Reference added
Include further reference to parking areas incorporating features to promote biodiversity, clean air and drawing carbon out of the atmosphere through thoughtful planting.	This matter is discussed further within the Climate Change, Sustainable Design, Construction and Energy SPD (2020) SPD, which has been referenced
Addition to state that residential cycle parking in flats/apartments should be located as close as possible to desire line(s) between every flat/apartment and the highway (or cycle facility).	Reference added
Consider whether secure but communal cycle storage can be installed in place of an on-street parking space as an alternative to provision within the building itself.	This is more appropriate for the retrofitting of cycle parking facilities into existing residential areas. Residential parking facilities should be designed on-plot

2.5 GBC councillors received and were invited to comment on a draft SPD in August 2021. The document was then considered by the Joint Executive Advisory Board on Monday 20 September 2021,¹ prior to the draft SPD being considered by the Executive on Tuesday 23

¹ Available at:

<https://democracy.guildford.gov.uk/ieListDocuments.aspx?CId=284&MId=1337&Ver=4>

November 2021,² and then full Council, on Tuesday 7 December 2021,³ alongside the draft Local Plan: Development Management Policies.

3. Formal consultation on the draft SPD

- 3.1 We held a formal consultation between Friday 21 January 2022 (midday) and Friday 18 February 2022 (midday). We advised stakeholders (organisations, members of the public, businesses and amenity groups) via email through our consultation database.
- 3.2 During the consultation period, the consultation document was available on our website and paper copies of the consultation document were available in the libraries located within the borough and in the main Council office at Millmead. These arrangements are in accordance with our [Statement of Community Involvement](#), May 2020.
- 3.3 You can see the 23 representations that we received during the formal consultation on the following webpage: <https://guildford.inconsult.uk/PSPD22/consultationHome>.

4. Finalising the SPD

- 4.1 We considered all the responses received during the consultation.
- 4.2 Appendix 1 contains a table setting out the main issues raised during the public consultation. It also sets out our response to each of the issues, the changes that we made to the SPD as a result of the issue, or explains why we didn't make any changes.
- 4.3 The main issues raised by either prescribed bodies⁴ or key stakeholders are identified in the first and second tables. Key stakeholders include statutory consultees, infrastructure providers, site promoters/developers and other community groups/organisations. The main issues raised by members of the public are in the third the table.
- 4.4 As noted earlier, the SPD gives guidance on Policy ID10: Parking Standards for New Development in the Local Plan: Development Management Policies which was also in development at the time of writing. The consultation on the SPD was undertaken at the same time as the Regulation 19 consultation for the DMP. Further changes to the SPD could have been made had the Inspector of the LPDMP considered that some of the SPD's content should form part of the Local Plan: Development Management Policies DPD.
- 4.5 The Inspector did not decide to include some of the SPD's content in the DMP however there have been some minor changes made to the SPD as a consequence of the Inspector's direction and Main Modifications. There have also been minor changes to ensure consistency with minor modifications made to the Reasoned Justification of Policy ID10: Parking Standards for New Development.
- 4.6 The Council's Executive decided to adopt the SPD at its meeting on 20 March 2023. You can see the Executive Report here: <https://democracy.guildford.gov.uk/ieListDocuments.aspx?CId=132&MId=1636>

² Available at:

<https://democracy.guildford.gov.uk/ieListDocuments.aspx?CId=132&MId=1239&Ver=4>

³ Available at:

<https://democracy.guildford.gov.uk/ieListDocuments.aspx?CId=132&MId=1239&Ver=4>

⁴ As listed in Regulation 4 of the Town and Country Planning (Local Development) (England) Regulations 2012

Appendix 1: Main issues raised

Prescribed bodies

Paragraph/ Section	Main Issue Summary/Respondent	GBC Response
	Natural England [‘Planning Consultations’ email address]	
General comment	<p>The topic this SPD 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> <ol style="list-style-type: none"> 1. This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area. 2. This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. 3. This 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 4. The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180). 	<p>We consider that these points are addressed, as appropriate, in Local Plan policies and other SPDs, most notably Policy ID4: Green and Blue Infrastructure in the Local Plan: Strategy and Sites (2019) and the Climate Change, Sustainable Design, Construction and Energy SPD (2020).</p>
	Historic England	
5.11	Suggested that this paragraph is revised to read “Other considerations will include proximity to and impact upon sensitive natural environments (e.g., Sites of Special	Agreed. Amendment made, now at para 5.10, as follows: “Other considerations will include proximity to and impact upon sensitive natural environments (e.g., Sites of Special Scientific Interest,

	<p>Scientific Interest, Special Protection Areas), historic built environments (e.g. in the setting of listed buildings, conservation areas) and archaeology. Within these areas, new car parking should be designed to be sympathetic to the sensitive environment and avoid damage to an area of archaeological significance”</p>	<p>Special Protection Areas), historic built environments (e.g. in the setting of listed buildings, conservation areas) and archaeology. When planning and implementing highways and other public realm works in sensitive historic locations, Historic England’s Streets for All: South East (HE, May 2018) should be consulted. Within these areas, new car parking should be designed to be sympathetic to the sensitive environment and avoid damage to an area of archaeological significance.”</p>
5.11 or Section 3	<p>We recommend also that reference is made in the SPD, either as an extension to para 5.11 or elsewhere in the draft document (e.g., in the Supplementary planning documents in Section 3 and the Bibliography), to the Historic England advice in Streets for All: South East (HE, May 2018). This will help to ensure that the integration of parking provision in sensitive historic environments is appropriately considered.</p>	<p>Agreed. Amendment made, now at para 5.10, as follows: “Other considerations will include proximity to and impact upon sensitive natural environments (e.g., Sites of Special Scientific Interest, Special Protection Areas), historic built environments (e.g. in the setting of listed buildings, conservation areas) and archaeology. When planning and implementing highways and other public realm works in sensitive historic locations, Historic England’s Streets for All: South East (HE, May 2018) should be consulted. Within these areas, new car parking should be designed to be sympathetic to the sensitive environment and avoid damage to an area of archaeological significance.”</p>
	<p>Surrey County Council</p>	
Max standards	<p>We note that for planning applications at non-strategic sites, Neighbourhood Plans, which are likely to contain minimum parking standards, will be given weight where they exist. We would like to support the implementing of ‘Maximum [car parking] Provisions’ as set out in Policy ID11 for all sites across the borough, not just those that are strategic.</p>	<p>Following feedback to the Regulation 18 Local Plan: Development Management Policies consultation it was apparent that there was a strong desire for parking standards in existing and emerging Neighbourhood Plans to have primacy in those areas to which they apply.</p> <p>Maximum parking standards exist for non-strategic sites in town centre and suburban locations. Expected standards in Rural and Village locations reflect the variations in public transport access and opportunities for active travel in these locations. As per NPPF para 108, “maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by</p>

		public transport.” We consider these factors allow the setting of maximum standards in urban areas, but that setting maximum standards in village and rural areas would not be compliant with the NPPF.
Car Clubs	Para 5.28 states that Developers “may choose to work with either the council’s preferred [car club] operator or their own supplier” if the marked car club parking bay is built within the development site itself. This would not be productive in the county council’s aim to provide an accessible and reliable car club network to the whole county. Using different car club suppliers may lead to existing residents not being made aware of a new car club space within a nearby development as it wouldn’t show up on the app or website of the county council’s chosen car club operator. For these reasons, we request that all future developments use the county council’s chosen supplier and any spaces within the curtilage of future developments are accessible to the wider public at all times.	The guidance referred to is consistent with the advice given in section 5 (4 th and 5 th paragraphs) of Surrey CC’s extant ‘Car clubs in new developments’ (March 2019) guidance document (available on request from Surrey CC’s Transport Development Planning team). Following email correspondence to clarify this matter, Surrey County Council, in an email dated 28 March 2022, withdrew its previous representation of 17 February 2022 with respect to this aspect of the SPD as follows: “I have liaised with our Car Club Officer and would like to retract the comment below that you’ve quoted. As you quite rightly pointed out, the SCC Guidance on Car Clubs in new Development states that developers can employ their own car club provider if the bays are within the development site.”
E-bikes	If more models with an un-detachable battery reach the market, there will be a need for provisions of charging points to serve bicycle parking spaces. The SPD should reflect the emerging and rapidly growing nature of this technology to accommodate any future demand.	Amendment made, now at para 5.70: “The emergence of e-bikes, which are typically of a higher value than pedal bikes, reinforces the need for secure parking with surveillance (either by CCTV cameras or natural surveillance from people going about their normal business). <u>In order to support the growth and use of electric bikes and where appropriate, consideration should be given to the provision of electric bike charge points adjacent to any secure cycle parking.</u> Charging of an ebike battery is typically undertaken in a domestic setting by removal of the battery, <u>but in some models, the battery is charged in-situ (DfT, 2020) however future mechanisms for the provision for charging ebikes at public destinations could be explored by non-residential developments if appropriate.</u> ”
	Waverley Borough Council	
General comment	We do not anticipate that the draft SPD would have any cross-boundary impacts for Waverley.	Noted.

	Environment Agency	
General comment	We are unable to provide comments on the Draft SPD as the issues it addresses are out with our remit.	Noted.
	National Highways	
General comment	<p>[NH made the following comment to the LPDMP consultation] – “The proposed policy covers a wide range of uses with maximum, minimum or expected numbers of parking spaces. One of the biggest opportunities for managing down traffic demand on the SRN is associated with limiting parking spaces at a destination, but this is particularly successful when policies such as this are supported by the delivery of other sustainable transport measures. We note that there are many references to improvements to pedestrian and cycle networks. However in terms of managing demand on the SRN and reducing single occupancy vehicle trips, we would expect a reference to both existing and planned bus and rail services.</p> <p>We have no additional comments to the Draft Parking Supplementary Planning Document 2022 not already covered in our comments to ID11 above.”</p>	<p>The policy and SPD provides for maximum vehicle parking standards for non-residential developments (the destination), except for some development types for which individual assessment and justification is required. The policy requires that for the provision of either car-free development or development in which the provision of parking is at lower than the defined maximum standards then this ‘must be justified by a coherent package of sustainable transport measures’. Criteria are set out including for ‘high public transport accessibility’, as well as to requirements for ‘excellent quality of walking and cycling access’ to appropriate centres. We consider applicants should be able to take into account the qualities of bus and rail services, both existing and planned, as part of their evidence in respect of a development’s public transport accessibility. The Development Plan, of which the draft LPDMP will form part as and when it is adopted, also includes the adopted LPSS. Policy ID3 Sustainable Transport for New Developments of the LPSS requires, at point 6), that ‘New development will be required to provide and/or fund the provision of suitable access and transport infrastructure and services that are necessary to make it acceptable...’ as well other requirements for specific transport infrastructure and services set out in the Infrastructure Schedule, which can be updated through revisions of the Guildford borough Infrastructure Delivery Plan, as well as in the site policies. The Infrastructure Schedule includes various proposed bus and rail schemes.</p>
	Transport for London	
General comment	We would welcome the adoption of a complementary approach to London Plan parking policies [maximums standards] by authorities close to London. I can confirm	Noted.

	that we have no specific comments to make on the Draft Parking SPD.	
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Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
	Grillo LLP	
General comment	The SPD does not include proposals for existing public car parking on the Upper High Street.	The Parking SPD details the standards for parking provision and guidance on its provision for new developments in the borough as opposed to addressing the provision for vehicles to park on the existing public highway and in existing public car parks. The Parking SPD has been renamed as the 'Parking Standards for New Development SPD' to further clarify this.
	Carter Jonas on behalf of Effingham Golf Club	
Page 42	<p>It is requested that the level of car parking associated with golf clubs and driving ranges is increased from the current proposal of a maximum of 1 space per 0.3 holes OR per driving bay OR Individual assessment/justification to (amended wording in bold/underlined): '<u>1 space per 0.25 holes</u> OR per driving bay OR Individual assessment/justification'</p> <p>The rationale for this is explained by reference to the use of cars by members to access the club given the amount of equipment required, the playing of the four-ball format of golf with players coming from different directions, and that players tend to arrive early and stay to socialise in the clubhouse after their round.</p>	The non-residential car parking standards follow that of SCC as the Highway Authority. Given there is an option for 'individual assessment/justification' to take place, we expect there to be an opportunity to propose a different level of provision if required, based on the facilities available at, and the needs of, the golf club.
	Regulatory Services (GBC)	
General comment	It is queried whether support could be given to existing commercial, residential, and educational uses to have	The Parking SPD and standards within are for new development in the borough. Permitted development rights exist to allow the

	incentives under the planning system to insert the infrastructure for EV charging. Section 5.29 covers this in part, but if for example planning permission for a group of flat owners to introduce EV charging to their parking areas was easily enabled we may see an increase in take up of EV.	installation of EVCPs in existing development. In instances of communal residential parking provision, the management company would be responsible for EVCP provision and management of this provision.
	Burpham Neighbourhood Forum	
General comment	We oppose the continued use of half parking spaces (0.5) spaces in standards for all developments. The SPD should specify that such requirements be rounded up, not down, in all circumstances.	The use of fractions allows car parking standards to be set at values which most accurately reflect the observed car availability levels in the borough. When this fraction is multiplied by the number of homes in the development, the number will be a whole number, or will be rounded to a whole number. For clarity, there is absolutely no intention to advocate implementation of physical partial spaces in any setting. Further guidance has been provided in the SPD in relation to the calculation of parking quantum.
	Barton Willmore on behalf of Martin Grant Homes	
General comment	It is recommended that clarity is provided on driveway design for off-street residential car parking that adjoin cycleways in addition to footways.	This is explained further in the Strategic Development Framework SPD, adopted in 2020. Para 3.3.17 of the SDF SPD states that "Cycle movement within the strategic sites should be made to minimise conflicts with other vehicles and pedestrians, in the context of the hierarchy of movement." The SDF SPD provides illustrative figures, showing both cross-sectional and plan views, for typical sections in a strategic site. For instance, Section 2, for a Primary Street comprising of residential development and a concentration of local facilities (page 44). In this section, dwellings front the primary street with segregated cycleways also provided. Vehicular parking would be accessed from the rear. This approach can be replicated on secondary streets (page 45 of the SDF SPD), or it may be that a continuous cycleway is 2-way, allowing for some driveways to be accessed directly from the secondary street. The relationship between parking bays which are unallocated and parallel to the carriageway would follow the design guidance

		provided in Local Transport Note 1/20, Cycling Infrastructure Design, specifically Figure 6.15.
General comment	We broadly agree with the cycle parking standards set out in Table B3 but note this includes a split for both long and short stay across many land use categories. Whilst the type and placement of cycle parking may vary depending on duration it is recommended that a flexible approach is taken on the type of provision required.	Further guidance on the type and placement of cycle parking best suited to various residential and non-residential development has been set out at para 5.48-5.71. As stated in para 6.129 of the Reasoned Justification for Policy ID10: "Cycle parking should be as convenient, if not more, than access to car parking." It is also recommended that cycle parking should be designed into developments from the early stage of design.
General comment	Flexibility regarding garage layout to accommodate cycle parking should extend further to capture the potential of standalone provision within property curtilage.	There is the opportunity for cycles to be accommodated in a standalone structure (para 5.55), in which case a garage could have the minimum internal dimensions of 6m x 3m - as indicated in Manual for Streets – and count as providing a car parking space.
	Savills Planning on behalf of St Edward Homes	
General comment	There is no need for every space to have a charging point (or the enabling infrastructure). St Edward propose that similar standards are adopted to those in the Surrey County Council Electric Vehicle Strategy 2018 for flatted developments. This would include 20% of spaces to have fast charge connections and a further 20% passive (i.e. with enabling infrastructure). This is particularly suitable for unallocated parking provision.	The proposals for EVCPs followed the Government's plans for the provision of EVCPs to be installed via Building Regulations. After the consultation on the Regulation 19 document/SPD had begun, 'Approved Document S: Infrastructure for the charging of electric vehicles' was published by the UK Government effective 15 June 2022. As a consequence, Policy ID10 point 2) e) for strategic sites and at point 3) e) for non-strategic sites, states that "the provision of electric vehicle charging will provide at least the minimum requirements set out in the Parking SPD Building Regulations (Part S)". Given the Government's ambition to phase out the sale of petrol and diesel cars by 2030 this requirement is necessary in order to allow residents the opportunity to charge at home.
	Savills Planning on behalf of Bloor Homes	
General comment	GBC will not be able to alter the public need / habits and desire for private cars on its own; and instead this should be the role for national government, who has more ability to provide incentives and / or restrictions to promote that	Parking policy is integral to a sustainable transport strategy and cannot be divorced from wider transport planning and spatial planning considerations. Parking provision must complement other sustainable travel initiatives such as the provision of public transport

	change. Bloor Homes considers it is more appropriate to provide choice to new residents and the level of parking the market desires. It is considered that the level of parking should be determined by market requirements and controlled by urban design policies and principles. The use of public transport can be promoted independently from parking provision, in order to provide choice to residents.	services. The role of Local Authorities with respect to transport is set out in the Government’s Transport Decarbonisation Plan (2021), where it states against Strategic Priority 5: Place-based solutions to emission reduction that, “[l]ocal authorities will have the power and ambition to make bold decisions to influence how people travel and take local action to make the best use of space to enable active travel, transform local public transport operations, ensure recharging and refuelling infrastructure meets local needs, consider appropriate parking or congestion management policies, initiate demand responsive travel, as well as promoting and supporting positive behaviour change through communications and education.”
	Councillor Seabrook	
General comment	‘Secure’ could be defined in terms of cycle parking	Given the differences in types of cycle parking relevant to different development scenarios, there is not a one-size-fits-all definition of secure. The ‘Sheffield Stand’ is promoted, now at para 5.50, alongside best practice to aid delivery of cycle parking which is as secure as possible in various residential and non-residential settings. Other aspects to promote best practice are included, such as advocating for internal parking in flats and apartments, and secure and lockable shelters, stores or compounds if this is unachievable (para 5.58). Likewise, long stay provision for non-residential cycle parking is best provided by a secure store or compounds (para 5.56)
5.32	Greater emphasis needs to be given to long term cycle parking. Perhaps an additional category of ‘long-stay public cycle parking’ is needed to distinguish it from the existing definition for ‘private’ parking.	The numerical standards set out for long-term cycle parking follow that provided in DfT’s Local Transport Note 1/20 guidance. Further design guidance in the draft Parking SPD aims to ensure cycle parking is attractive and secure, and notes that best practice guidance can be found in ‘Standards for Public Cycle Parking’ (The Bicycle Association, 2021).
5.40	Remove the word ‘rear’ – this should apply to all sheds.	Agreed. Amendment made at, now at para 5.56: “External access to a rear garden with a shed, or equivalent, would only be treated as

		provision of cycle parking if the doors are secured by mortice locks (as opposed to padlocks).”
5.42	‘Secure and lockable’ should be mandated, rather than preferable	The Parking SPD provides guidance, which will supplement Policy ID10: Parking Standards for New Development. Within the reasoned justification of the policy, specifically at para 6.130, it is specified that long term parking must be “more weatherproof and have greater security provided [than short stay cycle parking] through an enclosed and lockable shelter, store or compound.”
Table A3 and A4	The number of car spaces allowed is so much greater than the minimum required long-stay cycle spaces. That does not encourage modal shift. For example, only one cycle space is required for 200 sqm of office space but a max of 6 car spaces is allowed.	The cycle parking standards are minimum standards (therefore there is no limit on the quantum which can be delivered) whereas the car parking standards are maximum standards, effectively putting a cap on the number of spaces permitted. Likewise, low-car and car-free development is promoted through the policy.
Table B3 p47	It is accepted that residents of nursing homes are unlikely to ride bikes, but what about staff? 0.05 spaces per bedroom means only 1 space per 20 staff.	The numerical standards set out for long-term cycle parking follow that provided in DfT’s Local Transport Note 1/20 guidance. These are minimum requirements and do not limit the level of cycle parking to be provided. There is also a short stay requirement for 0.05 spaces per residential unit which could be expanded upon.
	Mr Richard Jarvis on behalf of Guildford Residents Association	
General comment	There is surely a case for including the standards for Strategic Sites within the SPD, rather than in Appendix B to ID11.	The standards for the strategic sites are set out in the Development Plan as opposed to the SPD to allow them to be given the full weight of policy given their strategic importance. As strategic sites will be masterplanned from the outset, the standards set in the Policy will complement the measures to facilitate sustainable transport options.
General comment	We consider that the standards set in the SPD should be treated as minimum standards (as in the Reg 18 consultation) except in the town centre.	The policy direction (maximum, minimum and expected standards) are set out in Policy ID10. We consider that maximum standards are necessary in urban areas to manage the local road network.

		Congestion and various externalities affect the urban area. In addition to congestion, within the town there is a need to make more efficient use of land by optimising density, in areas which are well served by public transport.
General comment	We ask for the standards for villages and rural areas (Table A2) to be set as 'minimum', rather than 'expected' standards.	The policy direction (maximum, minimum and expected standards) are set out in Policy ID10. With expected standards, there is flexibility for a developer to propose car parking standards which are lower or higher than that 'expected', by providing evidence to back up such a proposal.
Para 4.22	The standards for car parking in new residential development in the town centre and suburban areas are defined as maximum provision in Table A1. However, in para 4.22 the last sentence explains that 'it may be acceptable to provide a lower than required provision of car parking spaces'. Does 'required' mean the same as 'maximum' in this context? Given the difference in accessibility between the town centre and the suburban area, we propose that Table A1 should be split into two tables, with maximum standards being set for the town centre and minimum standards for the suburban area.	Amendment made, now at para 4.29: "The prioritisation of walking, cycling, public and shared transport, especially where the development is close to the town centre, urban district centre or local centre, may demonstrate that it may be acceptable to provide a lower than the maximum required provision of car parking spaces." The maximum standard for suburban areas is tailored to the level of accessibility in these areas. The maximum allowance of car parking is greater than for the town centre. For example, for 2 bed houses the maximum provision is 1 space in the town centre and 1.5 spaces in suburban areas.
	Iceni Project Limited on behalf of Portland Capital	
General comment	Despite the requirement for 'Individual assessment/justification' to be undertaken there is no guidance is provided as to the criteria in which this assessment/justification needs to adhere to, which could lead to some discrepancy between sites and determining what extent of work is necessary and the factors which would suggest a site to be accessible, or not. Additionally, as with other authorities, there can be scale used to show how accessible a site is e.g., Poor, Good, Excellent.	Individual assessment/justification is used in relation to non-residential development. These standards are based on SCC's Vehicle, Cycle and Electric Vehicle parking guidance for new development and therefore follows the approach they advocate. It is recommended that the appropriate approach to assessment and justification, including in terms of methodology and evidence, should be established through early engagement with Guildford Borough Council as the Local Planning Authority and Surrey County Council as the Local Highway Authority.
General comment	There are no parameters identified to help clarify when a site would be considered Edge of Centre or Suburban. This	The areas covered by 'Town Centre' and 'Suburban' are defined in the definitions section of the SPD. For clarity, we have removed the

	<p>could lead to different interpretations and as such uncertainty and potentially a difference of opinion between parties. Clearly some clarification and guidance within the SPD would be helpful in this regard, such as the distance to a public transport hub, frequency of services, operational hours, etc. being an indicator(s) of whether a site is considered to be accessible or not, as well as some guidance to help determine the location type of a site.</p>	<p>'edge of centre' boundary. This was only proposed to apply to retail uses. The Guildford Town Centre boundary, as defined on the Polices Map and in the SPD definitions section includes both the 'Primary Shopping Area' and the majority of edge of centre uses.</p>
<p>General comment</p>	<p>The standards are somewhat unclear in regard to the minimum EV charging requirement for both residential and non-residential development.</p> <ol style="list-style-type: none"> 1. With residential development for example it is suggested at paragraph 4.16 of the Draft Parking SPD that unallocated parking is preferred for flexibility, therefore for a large flat/apartment scheme with 100% unallocated parking it is unclear how should the EV charging requirements [1 chargepoint per dwelling] should be applied. 2. Further, during several pre-apps held in the past year with Surrey County Council Highways Officers, they have often suggested that a provision of 100% EV is proposed for residential development, and therefore it would be useful to have their input to understand if they concur with the above approach. 3. Similarly, for non-residential development, it is unclear how one charge point per development would work as part of a mixed-use scheme say with multiple uses, units or tenants. As such, further clarification of this guidance would be useful. 	<p>With the release of Approved Document S in 2022, it is now confirmed that EVCP provision will be included within Building Regulations. Therefore, Policy ID10 now states at 2) e) that "the provision of electric vehicle charging will provide at least the minimum requirements set out in the Building Regulations" (also repeated at 3) e) for non-strategic sites. With this, no numerical parking standards for strategic sites are included in the final SPD.</p>

<p>General comment</p>	<p>There is no clear guidance as to when a car club would be required, leaving some uncertainty in terms of which uses require them and also to what scale of development these would be necessary in order to be viable.</p> <p>In regard to Paragraph 5.28, which states ‘Surrey County Council has procured a single preferred supplier to provide county-wide car club provision under the Surrey car club contract’. Whilst it is not specified that Guildford Borough Council will also be following suit, it is assumed that this will be the case. As such, there is some concern that there is no flexibility in what can be offered by a development in relation to a car club and developers would be beholden to the suggestions of only one car club operator.</p>	<p>Access to a car club vehicle(s) would be a requirement of car-free development as described in point 4b) of Policy ID10. As part of the sustainable transport strategy of a site car clubs could be included as part of a wider package of travel planning measures.</p> <p>Para 5.28 (now para 4.33 in the adopted version) states that “Further information regarding the implementation of car clubs can be found in Surrey County Council’s ‘Guidance on car clubs in new developments’ (March 2019). In accordance with its statutory powers as the local transport authority, Surrey County Council has procured a single preferred supplier to provide county-wide car club provision under the Surrey car club contract, <u>including in Guildford borough</u>. If implementing the car club using on-street bays, the developer will be required to use the council’s preferred supplier. If implementing the car club using bays within the development boundary, the developer may choose to work with either the council’s preferred operator or their own supplier.”</p> <p>To aid clarity, paragraphs 5.26 and 5.28 (of the consultation version) have been moved from ‘Section C: Design guidance’ and are now contained under ‘Guidance on application of parking standards’ at para 4.32-4.33 of the adopted version.</p>
<p>General comment</p>	<p>The Draft SPD also states that spaces for car club vehicles should be supplied with an EVCP, as per the standards set out in Section B and Appendix C. This raises some queries in required to the application of the EVCP standards.</p>	<p>The table, and this specific reference, has been removed, following the modification to Policy ID10 which now reflects the fact that the provision of EVCP will follow the Building Regulations (Part S). Irrespective of this, if a car club space(s) is provided on-site, then the spaces would be supplied with an EVCP, as per the standards set out for associated spaces in the Building Regulations (Part S). Where a space(s) for car club vehicles is provided using on-street bays on the public highway, Surrey County Council, as the Local Highway Authority, would advise of the requirements.</p>
<p>General comment</p>	<p>It is assumed that, in Table A4, Residential would include for Residential Institutions as well as Dwelling houses, but it would be useful to clarify.</p>	<p>Table A4 states that ‘residential’ includes ‘All except sheltered/elderly housing or nursing homes’ with separate standards for ‘Sheltered/ elderly housing or nursing homes’. This mirrors the suggested guidance in the DfT’s LTN 1/20 Cycling Infrastructure Design.</p>

General comment	The absence of a standard for the minimum provision of short-stay for residential use leads to a concern in regard to cycle parking for visitors.	Amendment, Table A4 and B3 in the SPD (and Table B3 of Appendix B in the LPDMP):		
		Development Type	Minimum cycle parking spaces provided – short stay	Minimum cycle parking spaces provided – long stay
		Residential		
		All except sheltered/ elderly housing or nursing homes	<u>Individual assessment/ justification</u>	1 per bedroom
General comment	Appendix F in regard to ‘Average car availability levels in Guildford borough’ is significantly dated due to the nature of the Census data being from 2011. Whilst it is acknowledged that there may not currently be any more recent data, should it become available this appendix should be updated in order to assist with the assessment of parking for different areas and dwelling types.	<p>Given the length of time that has passed since the 2011 Census was undertaken, the potential for growth in car availability per property in the borough was considered, and the findings are as described in paragraphs 4.40-4.42 of the Parking Standards topic paper. In short, average car availability per property in the borough has not changed substantially over the period from 2011 to 2019.</p> <p>The car parking standards for non-strategic sites are set out in the SPD. This will allow them to potentially be updated through the preparation of a new version of the Parking SPD in the future, to reflect emerging evidence.</p>		

Other respondents

Paragraph	Main Issue Summary	GBC Response
General comment	Impractical objective to hope individuals will abandon their cars in favour of bicycles and/public transport therefore the level of residential car parking provision too low.	The car parking standards contained within the SPD are based on calculated average car availability.
General comment	There is uncertainty regarding the allocation and numbers of EVCP, including which car parks will have them and quantum of parking bays to be equipped	The Parking SPD details the standards for parking provision and guidance on its provision for new development in the borough as

		opposed to car parking provision on the existing public highway and in existing public car parks.
General comment	Reference to research statistics from 2006 and 2010 is a flaw. Research should look at future needs, not the past.	<p>The standards look to future needs with the potential for low-car and car-free development and car parking standards in areas well served by alternative forms of transport, amongst other aspects as set out in the Policy.</p> <p>Having compared Census and DfT vehicle licencing statistics, it was considered that the baseline did not need adjusted from 2011 as the difference between the two was virtually imperceptible.</p>
1.4	The design guide applies to all sites yet needs to clarify that Neighbourhood Plans will take precedence in non-strategic sites	<p>An amendment has been made at para 1.4 which now reads: “Numerical parking standards and any design guidance contained within Neighbourhood Plans will take precedence in Neighbourhood Planning areas, except in relation to strategic sites. The numerical car and cycle parking standards in this SPD apply to non-strategic sites where Neighbourhood Plans do not contain this information. The design guidance in this SPD applies to all new development in Guildford borough, except non-strategic sites covered by relevant policy in Neighbourhood Plans. Design guidance is provided in relation to residential and non-residential car and cycle parking spaces, garages, Electric Vehicle Charging Points (EVCPs), designated accessible parking bays, car club bays and parking for motorcycles.”</p>
1.5	The draft SPD fails to identify parking for business purposes	<p>Parking for business purposes is included in the non-residential parking standards contained within the Parking SPD, which are set at levels which aim to accommodate parking requirements for both staff, customers and suppliers. Paragraph 1.5 is introductory text which does not intend to cover all details but merely set the scene.</p>
General comment	No minimum residential parking requirement means in reality the supply of a charging point but no parking place.	<p>After the consultation on the Regulation 19 document and SPD had begun, ‘Approved Document S: Infrastructure for the charging of electric vehicles’ was published by the UK Government and will take effect on 15 June 2022. A proposed minor modification, at point 2) e) for strategic sites and at point 3) e) for non-strategic sites, states that “the provision of electric vehicle charging will provide at least the</p>

		<p>minimum requirements set out in the Parking SPD Building Regulations (Part S)”. The Approved Document states, at 1.1, “Where no associated parking spaces are provided, there is no requirement to install an electric vehicle charge point.”</p> <p>Given this minor modification to the policy, Table C1 of Appendix C in the draft Parking SPD ‘EVCP Standards for Strategic and Non-Strategic Sites’ has been removed.</p>
General comment	The concept of half of a car space is bizarre and would mean parking outside the curtilage of the property for both visitors and the second or third car on adjacent road side parking.	Further worked examples are given in the Parking for New Development SPD to explain how the calculating of a fraction of a number is dealt with.
General comment	<p>The SPD does not take account of:</p> <ul style="list-style-type: none"> • The 50% of the population which do not fit the following “A fit able person and a public transport system which by implication is integrated at a cost which is affordable for a family of 4.” • Inability to utilise ‘active travel’ through age or infirmity • Inability to carry 20kg+ for 15 minutes continuously; the 15-minute community proposal • Those outside the 50 metres to a bus stop; the blue badge criteria. • The lack of ‘planned’ public transport 	Policy ID10 and the SPD allows for a rate of residential car parking which matches current car availability. This, in turn, is reflective of differences in accessibility to key services and facilities for the area types and established travel habits. The standards combine a spatially-differentiated approach to the provision of vehicle parking for new residential developments with the focus of restraint increasing closer to Guildford town centre where opportunities for active and sustainable travel increase. The policy and SPD also support the expansion of car club vehicles within the vicinity of potential car-free developments, providing choice to those who may not own a car, or have limited public transport options/ active travel opportunities to reach their destination.