



Consultation Statement

**Supplementary Planning
Document SPD3:**

Parking Standards and Design

February 2012

LOCAL DEVELOPMENT FRAMEWORK

If you need help to understand this information, please ask someone to phone 0161 912-2000 to let us know how we can best provide this information.

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FRENCH

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GUJARATI

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POLISH

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PUNJABI

Haddii aad dooneeyso in lagaa taageero garashada macluumaadkaani, fadlan qof uun ka codso inuu waco telefoonka 0161 912-2000 oo noo sheego sida ugu fiican oo aanu macluumaadkaani kuugu soo gudbin karno.

SOMALI

اگر آپ کو یہ معلومات سمجھنے میں مدد کی ضرورت ہے تو براہ مہربانی کسی سے کہیے کہ وہ ہمیں 0161 912-2000 پر ٹیلیفون کرے تاکہ ہمیں معلوم ہو سکے کہ آپ کو یہ معلومات فراہم کرنے کا بہترین طریقہ کیا ہے۔

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1 Introduction

- 1.1 In preparing Supplementary Planning Documents, the Council is required to follow the procedures laid down in the Town and Country Planning (Local Development) (England) Regulations 2004, as amended, and in its adopted Statement of Community Involvement.
- 1.2 The SPD ensures that the level of car parking associated with a development proposal or use is appropriate in order to support a reduction in reliance of the private car.
- 1.3 The Supplementary Planning Document (SPD) will assist with the interpretation of Policies L4 Sustainable Transport and Accessibility and L7 Design of the Core Strategy and the parking standards.
- 1.4 This Consultation Statement contains a summary of which bodies and persons were invited to make representations and how they were invited to make representations at both the Scoping and Issues stage (September 2009) and the more recent consultation on the draft SPD in February 2011.

2 Statement of Community Involvement Review

- 2.1 The Council adopted its Statement of Community Involvement Review in February 2010. This sets out the process by which the Council will consult appropriate bodies in the course of drafting all documents that are part of the Local Development Framework.

3 Public Consultation

- 3.1 Consultation on the Scoping and Issues SPDs took place between 7th October 2009 and 9th November 2009. The proposed SPDs consisted of the following:
 - Planning Obligations SPD
 - Affordable Housing SPD
 - Open Space and Recreation SPD
 - Green Infrastructure SPD
 - Social Infrastructure SPD
 - Developer Contributions to Highway and Public Transport Schemes SPD
 - Consideration of climate change factors in the design and construction of developments and the public realm SPD
 - House extensions Design Guide SPD
 - Car and Cycle Parking SPD

- 3.2 Consultation on the Supplementary Planning Document SPD3: Parking Standards and Design took place between Monday 7th March 2011 and Monday 18th April 2011.
- 3.3 The Specific Consultees that were formally invited to comment on both consultations by letter are listed in Appendix 1.
- 3.4 The General and Other Consultees that were formally invited to comment on both consultations are listed in Appendices 2 and 3 respectively.
- 3.5 A public notice was displayed in the 7th March 2011 issue of Manchester Evening News (Appendix 8).

4 Inspecting the Scoping and Issues and SPD3: Parking Standards and Design consultation papers

- 4.1 The Supplementary Planning Documents Scope and Issues and SPD3: Parking Standards and Design consultation papers were made available for inspection at the following locations:
 - On the Council's website: <http://www.trafford.gov.uk>
 - Trafford libraries;
 - Access Trafford offices

- 4.2 Individual copies of the documents were made available on request.

5 Representations on the Scoping and Issues SPD and the SPD3: Parking Standards and Design consultation papers

- 5.1 The deadline for comments made on the SPDs Scope and Issues paper (October 2009) was Monday 9th November 2009 and for SPD3: Parking Standards and Design the deadline for comments was Monday 18th April 2011.

Written Correspondence was sent to:

Strategic Planning & Developments
Waterside House
Sale Waterside
Sale
Greater Manchester
M33 7ZF

Representations by e-mail were sent to:
Strategic.planning@trafford.gov.uk

- 5.2 Consultation responses and the identity of those making them are matters of public record and open to public scrutiny and copies can be obtained at the address above.
- 5.3 Requests to be notified of the next stage of consultation were recorded along with any representations made.

6 Consultation Responses and Main Issues

- 6.1 A total of 4 individual responses were received to the Scoping and Issues SPD consultation. A summary of these responses are available at Appendix 6 of this report. In total, 8 separate organisations made representations during the consultation period on the combined SPD3: Parking Standards and Design. A copy of the report showing all the comments made and the Council response to these is attached as Appendix 7.
- 6.2 Some concern was raised by the Greater Manchester Cycling Campaign who suggested that the whole of Section 11 be replaced with Greater Manchester Police's (GMP) Cycle Parking Design Guidance, and that the cycle parking standards also be replaced with the level of provision required by GMP's Cycle Parking Standards. These standards appear to be based upon the 'Greater Manchester Cycle Parking Guidance' and have not gone through any form of public consultation. The current guidance was out of date when adopted into the Greater Manchester Local Transport Plan in 2006. They also suggested that long stay cycle parking (more than 2 hours) should be under cover as per motorcycles and vertical cycle lockers (such as those found at Metrolink station in Trafford) are generally too small for larger commuting bikes, cannot be used by bicycles with rear mud guards (as the bike has to be balanced on the rear wheel), and can require the bicycle to be lifted up (which can be difficult for elderly / less physically fit cyclists, or those with luggage).

7 Main Changes to the SPD

- 7.1 Changes to the SPD have been made in response to the representations made and also to reflect changes to Policies in the Core Strategy that have been made through the Examination process, which form the policy justification for the SPD. The main changes are summarised as follows:
- Changes to the SPD have been made in response to the representations made and also to reflect changes to Policies in the Core Strategy that have been made through the Examination process, which form the policy justification for the SPD.
 - The car and cycle parking standards largely originate from the North West Regional Spatial Strategy (RSS) Partial Review and are set

down in the Core Strategy, which forms part of the Local Development Framework. The car and parking standards contained within the North West RSS Partial Review were subject to an Examination in Public in March 2010 and although the Report of the Panel was never formally issued, its findings released under a freedom of information request did not recommend any changes to the cycle parking standards. Only minor changes to the car parking standards in the Core Strategy were therefore made in the light of the findings.

- As part of the consultation on the Core Strategy the Car and Parking Standards were subject to public consultation and examination through the Core Strategy process. As the Core Strategy has now been adopted, it is not possible to make further changes to the proposed standards at this stage.
- It is also not possible to make further changes to the definition of “accessibility areas” as the accessibility areas are specified in policy 13.23 of the Core Strategy which is now adopted.
- The guidance for the type of cycle parking to be provided were informed by a draft document ‘Greater Manchester Cycle Parking Guidance’ produced by AGMA. This document has not been formally adopted to date. Much of the advice reflects that in the GMP Cycle Parking Design Guidance. Changes have however been made to section 11 of this SPD to reflect the advice in the GMP document and to require covered parking for long stay cycle parking and horizontal rather than vertical lockers.
- The SPD is considered to be in accordance with the Government document ‘Planning for Growth’ published in March 2011. Planning for Growth indicates that there will be a default position for the grant of planning consent for sustainable development. SPD3 encourages the provision of sustainable development and provides guidance as to how this can be achieved in respect of parking. The guidance is intended to help businesses submit planning proposals that meet the Council’s requirements and enable planning decisions to be expedited in line with the Government Statement.
- Although the SPD indicates that parking provision that meets the maximum standard for parking will be appropriate in most circumstances, the SPD allows some flexibility. It requires that where a developer seeks to provide a lower level of parking than the standard set down in the Core Strategy this will need to be fully justified and developers will need to demonstrate what measures, for example design, location or operation are to be taken to minimise the need for parking.
- The quality of the environment is an important planning consideration and the requirement to maintain established high quality vegetation or

site features which contribute to the amenity of the area is particularly important in achieving sustainable development. It encourages developers to give careful consideration to the level of parking and the layout and design of car parks on their sites. The guidance does not prevent all parking in new developments to the front of a residential property but specifies “where it would be detrimental to the character of the area”. It is considered that will not be unduly onerous for developers but will encourage them to provide imaginative designs.

- One of the representations received expressed concern that garages of a size sufficient to accommodate an average family car should be included towards meeting the parking requirement, and that the imposition of a condition on planning permissions requiring a garage to be retained for the parking of a vehicle is likely to fail the tests of Circular 11/95 regarding enforceability. The guidance is intended to encourage residents to park on site where parking is provided rather than on street. Where garages of standard sizes are provided they are less likely to be used for parking of a motor vehicle than larger garages, as they will usually not accommodate a motor vehicle and other items which need to be stored such as bicycles, lawn mowers etc. The policy therefore sets down the criteria which will be used to assess whether a garage will be accepted as part of the parking provision.
- A condition requiring a garage to be retained for the parking of a motor vehicle will be particularly focused on the long term use. A condition which states that the garage should not be converted into living accommodation would be enforceable and in line with Circular 11/95. No changes have therefore been made to Section 5.7 of SPD3.

8. Next Steps

- 8.1 All consultation responses for the Scoping and Issues SPD and Planning Obligations consultations have been fully considered and taken into account in finalising the SPD4 – A Guide for Designing House Extensions.

Appendix 1 - Specific Consultees

Organisation
Cheshire East Council
4NW
Agden Parish Meeting
Ashley Parish Council
British Telecom
Carrington Parish Council
Cheshire West and Chester Council
Cheshire East
City of Salford
Department for Transport (Rail Group)
Dunham Massey Parish Council
English Heritage
Environment Agency
Greater Manchester Police Authority
Highways Agency
Little Bollington Parish Meeting
Lymm Parish Council
Manchester City Council
Mobile Operators Association
Natural England
North West Development Agency
North West Strategic Health Authority
Norweb Energi
Nuclear Electric Ltd
Partington Town Council
Powergen Plc
Ringway Parish Council
Rixton with Glazebrook Parish Council
Rostherne Parish Council
SP Energy Networks
The Coal Authority
United Utilities
Warburton Parish Council
Warrington Borough Council

Appendix 2 – General Consultees

Organisation
Altrincham Chamber of Commerce, Trade, Industry
Better Transport Partnership
Brighter Futures Partnership
Church Commissioners for England
Clean and Green Partnership
Community Cohesion Community Forum
Culture Partnership
Disability Rights Commission
Ethnic Minority Outreach Project
Everyone & Everywhere Matters Partnership
Friends of the Earth
GM Chamber of Commerce
Greater Manchester Pay and Employment Rights Advice Service
Healthy Living Partnership
Life Begins at 50 & Over Partnership
Manchester Friends of the Earth
Positive Partington Partnership
Quality Homes For All Partnership
Safer Trafford Partnership
Sale Moor Community Partnership
Trafford Access Group
Trafford Disability Advisory Group
Trafford Economic Alliance Partnership
Voice of BME Trafford

Appendix 3 – Other Consultation Bodies

Organisation
50+ Voice Network
A 'Ahmed
A 'Purdey
A.D 'Clowed
Advisory Council for Education of Romany & Traveller
Alan 'Shillaker
Alister 'Rowe
Altrincham & Bowdon Civic Society
Altrincham Association Football Club Ltd
Altrincham Town Centre Partnership
Alyn Nicholls & Associates
Arawak Walton Housing Association
Arcon Housing Association
Arcus Consulting
Asda Stores Ltd (Client)
Ashiana Housing Association
Ashton-on-Mersey Golf Club
Atisreal Ltd
Audrey 'Carter
B 'Shannon
Barratt Manchester
Barton Willmore
Bellway Homes Ltd
Bolton Council
Bowdon Conservation Group
Bridget 'Garner
Bridgewater Meeting Room Trust
British Wind Energy Association
Bruntwood
B-Serv Ltd
C 'Wright
Caldecotte Consultants
Campaign for Real Ale
Carrington Business Park
CB Richard Ellis
CB Richard Ellis Ltd
Cheshire Wildlife Trust

Chris Thomas Ltd
Christine 'Mitchell
City Residential
Colliers CRE
Council for the Protection of Rural England
Cunnane Town Planning LLP
Cyclist Touring Club
D 'Stevenson
Dalton Warner Davis LLP
David L Walker - Chartered Surveyors
David Mclean Homes Limited
David Wilson Homes (North West)
De Pol Associates
Decathlon UK Ltd
Denton Wilde SAPTE
Development Planning Partnership
DPDS Consulting Group
Drivers Jonas
DTZ
Dunlop Haywards Lorenz
E 'Thompson
E 'Turner
Emery Planning
Equity Housing Group
Eric 'Clarke
Erinacous Planning
Forestry Commission
Frank Marshall & Co.
Friends of Old Trafford
Fusion Online Limited
G E Middleton & Co Ltd
G.J. 'Phelan
Gee Squared
General Aviation Awareness Council
George Wimpey Manchester Ltd
Gerald Eve
Gerald Knight Associates
GGP - Old Trafford
GL Hearn
GM Ecology Unit
GM Fire and Rescue Service
GM Geological Unit (Urban Vision Partnership Ltd)
GM Police
GMPTE

GONW
Gough Planning Services
Graham Hitchen Associates
Great Places Housing Group
Greater Manchester Cycling Campaign
Greater Manchester Police - Altrincham Area
GVA Grimley
Hallam Land Management Ltd
Harvest Housing Association
Health and Safety Executive
Heather 'Fogg
Herb 'Booth
Higham & Co
Home Builders Federation
How Commercial Planning Advisers
I 'Nicholas
I 'Quigley
Indigo Planning Ltd
Irwell Valley Housing Association
J 'Crews
J 'Townsend
J10 Planning
Jack 'Etchells
JASP Planning Consultancy Ltd
Jim 'Stuart
John Rose Associates
John 'Waghorne
Jones Lang Lasalle
Judie 'Collins
K 'Dunbar
Keep Chorlton Interesting
Kelloggs
King Sturge & Co.
King Sturge LLP
Knight Frank
Lafarge Aggregates
Lambert Smith Hampton
Lancashire County Cricket Club
Lancashire County Gardens Trust
Lichfield Planning
Louise 'Alexander
Louise 'Green
M 'Walsh
Manchester Airport

Manchester United Football Club
McInerney Homes North West
Mersey Basin Campaign & Action Irwell
Michael J 'Crawley
Mike 'Alexander
Miller Homes
MP Altrincham & Sale West
MP Stretford & Urmston
MP Wythenshawe & Sale East
N 'Boran
N 'Rashid
National Grid (NW Area)
National Grid Property Ltd
National Trust
Network Rail
NFU
NJL Consulting
NJL Consulting
Old Trafford and Gorse Hill Partnership Board
Old Trafford Liaison Group
P Fahey & Sons
P 'West
Passenger Focus
Paul Butler Associates
Peacock & Smith
Peel Holdings
Peel Land and Property Limited
Persimmon Homes (North West)
Peter Cunliffe Chartered Surveyors
Peter 'Green
R 'Irvine
R 'Townsend
Ramblers Association (Manchester & High Peak)
Rapleys LLP
Red Rose Forest
Redrow Homes (NW) Ltd
Rita
Road Haulage Association Ltd
Rochdale MBC, Strategic Planning Service
Royal Mail Property Group
RSPB (NW Region)
S 'Doggrell
S 'Taylor
Sale Civic Society

Sale Town Centre Partnership
Salford & Trafford Health Authority
Salford City Council
Savills
Shell Chemicals UK Ltd
Shell International Ltd
Shell UK Pipelines
Smiths Gore
South Trafford College
Sport England North West
Stella 'Millnar
Stephen 'Farndon
Stephen 'Trenchard
Steven Abbott Associates
Stewart Ross Associates
Strategic Planning Advice Ltd
Stretford Town Centre Partnership
Sue 'Nichols
Susan 'Jankin
Sustrans
T.E 'Stevenson
Targetfollow
Taylor Wimpey UK Limited
The Cedar Rest Home Ltd
The Co-operative Group Ltd
The Co-operative Property Division
The Emerson Group
The Planning Bureau Limited
The Theatres Trust
Thomas 'Hague
Timperley Civic Society
TMBC Overview and Scrutiny Committee
Trafford Healthcare NHS Trust
Trafford Housing Trust
Trafford Leisure Trust
Trafford MBC
Traveller Law Reform Project
Tribal MJP
Tung Sing Housing Association
Turley Associates
United Utilities
Urban Splash Ltd
Urmston Town Centre Partnership
V.J. 'Less

Victor 'Partridge
Viridor Waste Management
Voice of BME
Wainhomes NW Ltd
Walton & Co
Wigan MBC
Woodland Trust

**Appendix 4 – Consultation letters to Specific, General & Other
consultation bodies for Scoping and Issues papers**

Trafford Core Strategy: Supplementary Planning Documents – Scope and Issues consultation.

I am writing to inform you about further consultation that is being undertaken on the Trafford Core Strategy.

Your views are invited on the *Supplementary Planning Documents – Scope and Issues* document. The document details the proposed structure and content of a series of Supplementary Planning Documents (SPDs) that the Council is intending to produce to support the delivery of the Trafford Core Strategy. We want your views on the issues identified and the proposed scope and content of the documents, ahead of the production of draft SPD alongside the Publication version of the Trafford Core Strategy.

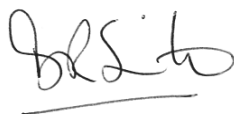
The Scope and Issues document together with information relating to the Trafford Core Strategy can be viewed through the Local Development Framework page on the Trafford website (www.trafford.gov.uk).

If you wish to make comments I would be grateful if you could do so by no later than 5.00 pm on **Monday 09 November 2009** via:

On-line at: www.trafford.gov.uk
Email to: strategic.planning@trafford.gov.uk
Post to: c/o Strategic Planning & Developments,
1st Floor Waterside House,
Sale Waterside,
Sale M33 7ZF

If you do require hard copies of any of the documents, or have any further queries about the consultation, please do not hesitate to contact the LDF team on 0161 912 4475.

Yours sincerely



Dennis Smith
Head of Strategic Planning & Housing Strategy

**Appendix 5 – Consultation letters to Specific, General & Other
consultation bodies for SPD3: Parking Standards and Design**

Dear Sir/Madam

Planning Obligations, Parking Standards and Design and Designing House Extensions and Alterations Supplementary Planning Documents Consultation

I am writing to notify you about a consultation which is taking place on Trafford's draft Planning Obligations, Parking Standards and Design and Designing House Extensions and Alterations Supplementary Planning Documents.

The purpose of these SPDs is to partly update and replace the current suite of supplementary planning documents in line with the new policies set out in the Trafford Core Strategy and to set out further contributions which have not previously been required.

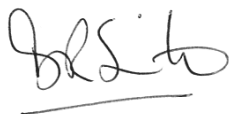
A copy of all the SPDs, together with copies of the technical notes and other supporting information are available to view on the Trafford website at www.trafford.gov.uk and at all Trafford libraries and at Access Trafford offices.

If you wish to make comments on this documents please do so in writing no later than 5.00pm on 18th April 2011 via:

On-line at: www.trafford.gov.uk
Email to: strategic.planning@trafford.gov.uk
Post to: c/o Strategic Planning & Developments,
1st Floor Waterside House,
Sale Waterside,
Sale M33 7ZF

If you require hard copies of any of the documents, or have any further queries about the SPDs, please do not hesitate to contact the LDF team on 0161 912 4475.

Yours sincerely



Dennis Smith
Head of Strategic Planning & Housing Strategy

**Appendix 6 – A summary of the responses received to the
Scope and Issues consultation of the SPDs prepared to
support the Core Strategy, carried out in 2009**

Trafford LDF – SPD3: Parking Standards and Design
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Person ID	Comments ID	Summary Of Rep	Council Response
1026	202	- These should be incorporated into the highway and public transport SPD linked to the whole concept of sustainability rather than a set of rigid criteria to be applied no matter how good or bad the public transport provision is in any one area.	The car and cycle parking standards will be detailed in the Core Strategy. The SPD will provide guidance as to how the standards will be operated. Areas will be designated an Accessibility Area Type in accordance with the RSS. In addition a questionnaire will assist in determining levels of accessibility by public transport and what flexibility should be applied to the standards.
1073	240	<p>The Agency is encouraged by the aspirations of the SPD, 'to ensure that the level of car parking associated with a development proposal or use is appropriate in order to support a reduction in the reliance on the private car.' The Agency recognises the importance of parking levels as a determining factor in peoples modal choice, and as such, support the aspirations of the SPD.</p> <p>An area of the proposed content of the SPD is 'interpreting most accessible, accessible and least accessible areas.' This work should be undertaken in parallel with the development of the LDF transport evidence base to identify which areas require public transport infrastructure intervention in order to improve accessibility. Improving accessibility via public transport, cycling and walking infrastructure should assist in promoting modal shift away from the private car and help reduce the global demand for parking provision.</p>	Welcome the support given to the proposed SPD.
1150	112	Maximum security is needed for pedal cycle parking if the use of this mode is to be encouraged, given that bikes seem more easily stolen than cars or motor cycles. The aim of reducing reliance on the private car is most welcome. (There is a typo in the Aim statement - surely should be: "reliance ON the")	Details will be provided regarding the types of cycle parking required for long and short stay cycle parking.
1182	110	The aim for this SPD to 'support a reduction in reliance of the private car' is very welcome. There should also be a requirement to provide cycle parking facilities at new developments as appropriate for the size and location of the development.	The level of proposed cycle parking will be set down in the Core Strategy and further information on the type of cycle provision will be given in the SPD.

SPDs in General

Person ID	Comments ID	Summary Of Rep	Council Response
1026	187	The Learning from Experience Document published by the Planning Inspectorate in September entitled 'Local Development Frameworks' points out that the core strategy should be a brief document conveying the main elements of the spatial vision and strategy. The Core Strategy should focus relentlessly on critical issues that relate to the way the area is intended to develop and the strategies to address the critical issues identified. Leaving critical questions to be answered in subsequent DPD's or SPD's is likely to lead to a finding of unsoundness.	The Trafford Core Strategy has been found sound and adopted in January 2012. The combined SPD1 Planning Obligations is based on sound policies from the Core Strategy.
1026	203	<p>Most of the SPD's set out in the report will be affected or superceded by the debate at the Examination and the introduction of CIL. They are already covered by policies in the Draft Core Strategy and if they are to be considered critical to the delivery of the strategy then they should remain within it, if not then the issues should be included within an SPD however it is clear from Government advice they should not be in both, and one should naturally follow the other. Most importantly, to make sense of the contributions that may or may not be required is the Local Infrastructure Plan and this is currently missing from the debate. The SPDs are setting out how contributions may be collected but at the present time there is no indication what they may be collected for and what the costs will be.</p> <p>In conclusion it is considered that these SPDs are premature at the present time and should be delayed until after the Examination and the publication of the legislation on CIL. These comments are in relation to the information currently published and our client retains the right to comment further on the matters in this report and any future documents covering these matters to be published by the Council.</p>	The Trafford Core Strategy has been found sound and adopted in January 2012. The combined SPD1 Planning Obligations is based on sound policies from the Core Strategy.
1072	128	<p>In addition to considering the responses to the consultation questions, a written response is requested to the following questions, in order to be able to contribute usefully to the emerging Local Development Framework over the coming months:</p> <ul style="list-style-type: none"> - Has the timetable for producing the Core Strategy Publication version slipped from November 2009 (as described in the LDS) to June 2010 (as implied in the current consultation document). - What are the consultation arrangements for draft SPDs; what form will "public 	<p>The Publication version of the plan is now expected to be published in summer 2010. This is a variation from the approved LDS.</p> <p>As a result the public consultation on the proposed draft SPDs will also be postponed in order that it runs concurrently with that for the Publication document. The precise nature of this public consultation has not been</p>

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		participation" take, during February 2010, as scheduled on page 3 of the consultation document?	finalised as yet, however it will be governed by the Council's Statement of Community Involvement.
1072	136	It is considered that since the Core Strategy has not been finalised , speculating on whether the SPDs, which are at the scoping stage of production, will assist in delivering the Strategy is impossible.	The Trafford Core Strategy has been found sound and adopted in January 2012. The combined SPD1 Planning Obligations is based on sound policies from the Core Strategy.
1072	137	There are few references to the obligations to be placed upon the Local Authority; only one SPD, that for open space and recreation, will say how the money collected will be spent. It is vital, if contributions are to be accepted as anything other than another tax, that the LA makes a commitment to spend the sums collected for the specific purpose and within a given time limit, in default of which they should be returned to the developers.	The combined SPD1 Planning Obligations clearly sets out how monies will be spent.
1072	138	The SPD on Social Infrastructure refers to capital and revenue spending; it is the only one to do so and it does not apply to the same the same distinction to all types of social infrastructure. Part of the agreement for contributions under each and every SPD - must be that they provide for capital works, the necessary revenue funding is identified and earmarked.	The combined SPD1 Planning Obligations clearly sets out how monies will be spent.
1093	152	<p>For SPDs and other guidance covering a specific area, e.g. masterplans, a wide range of RSS policy may be relevant. Thematic policies on the economy, housing, transport and the environment should be considered. Also policies RDF 1-4 set out the spatial priorities for development across the North West, including priorities for development, rural areas, coast and Green Belt. Chapters 10-13 of the RSS set out broad strategies for each sub region in the North West, and provide more detailed policies for the different parts of each sub region.</p> <p>A further consideration for area briefs and masterplans will be the sequential approach as expressed generally in Policy DP4, and also in policies W3, in relation to office development and W5, in relation to retail development. It is important that masterplans and area briefs promote good quality, sustainable design and construction.</p> <p>A further consideration for area briefs and masterplans will be the sequential approach as expressed generally in Policy DP4, and also in Policies W3, in relation to office development and W5, in relation to retail development. It is important that masterplans and area briefs promote good quality, sustainable design and</p>	Comments noted.

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		construction.	
1120	109	<p>Trafford College acknowledges and welcomes the opportunity to remain actively involved in supporting Trafford Council to shape its planning policies and to assist the Council in ensuring the effective delivery of its policies, services and aspirations. The College plays an important role in the Borough in its capacity as a key service provider of high quality training and education, as an employer and as a landowner. The college is to continue to work in partnership with the Council and other stakeholders, as necessary, to assist the Council to ensure that the best quality services are developed and maintained to serve the needs of Traffords residents now and into the future.</p> <p>The college notes that the formal consultation period to the draft SPDs is anticipated to commence early 2010. The college has the potential to assist delivery of the aspirations in several of the SPDs and considers that it can play a key role in delivering high quality, sustainable development in the borough.</p> <p>The College wishes to be continually involved in the development of the SPDs as the formal consultation process gets underway and welcomes the opportunity to continue working with the Council.</p>	Comments noted.
1150	113	<p>Should SPD scope be expanded to look at additional issues? If so what?</p> <p>The general issue of whether or not a particular area is now fully developed, and the planning consequences of this, should at least be briefly referred to and examined in some part of this general planning process. There must already be some parts of the Borough where there is simply no more room for any development, except by demolition and re-development on site, a process which could mean the loss of some locally valued building or facility.</p> <p>If there is a conflict of issues or priorities, which SPD would rule? That is, is there a need for a hierarchy of SPDs, and if there is, what would it be? This might have consultation implications. Quite apart from the issue that staff in the Planning Office have to undertake the task of writing them, it would be preferable not to combine any together, because to do so would compress some issues to fit into a smaller conceptual framework. This would lose some finer points of planning detail which might have a significant relevance to a specific planning issue at a future date.</p>	A combined Planning Obligations SPD has now been produced.

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1152	112	After reviewing the Scope and Issues Report, in terms of the proposed timescale for the production of the Trafford Core Strategy, it is understood that the Council intends to consult upon all 8 draft SPDs in February 2010. It is important to stagger the proposed dates for consultation, or provide a longer consultation period to ensure sufficient opportunity for review. This would also give the LPA further time in which to consider the representations received as a result of the consultation.	It is generally preferable to consult on a number of documents at the same time to prevent consultation fatigue from setting in among consultees.
1183	101	Following a review of the report it is noted that the Council intend to consult upon all 8 draft SPDs in February 2010. It is recommended that a more staggered approach is adopted as this will provide the public, developers, landowners and other interested parties with sufficient time to review the consultation document and submit informed representations. Staggering the different consultation exercises will also provide the LPA with more time to consider the representations received.	A combined Planning Obligations SPD has now been produced.
1185	101	A bespoke SPD should be explored to identify and protect specifically targeted shopping parades and to limit the amount of takeaway outlets in the Borough. Shopping parades are an integral part of community life as they encourage social cohesion. Shopping parades have a community value that is greater than the sum of its parts. As such assurances are needed that specific shopping parades will be treated on a case by case scenario. Further to this, the increase in takeaway outlets should be monitored and consideration should be given to ensuring that areas do not become saturated. (e.g. the Waltham Forest SPD).	Comments noted. Consideration will be given to a future SPD to cover these issues.
1185	102	The Media City site provides an excellent opportunity for the Borough which should be embraced and maximised through development controls. The forward planning system should be tailored to reflect the unique nature of particular development sites to ensure that the character and merits of these sites are maintained. Media City brings with it considerable opportunities for development within a specific part of Trafford, however in order to capitalize fully, it is suggested that agreed developments should be sympathetic to the local industry, in this case the media/knowledge industry.	The Council has adopted informal planning guidance for the Mediacity:UK area.
1185	103	Stretford Town Centre needs a new vision, a planning document should be created to articulate Stretford's unique position and attributes within the Borough. As the town centre is split by major roads, the town lacks a sense of place and this is	Comments noted.

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		something that has not been addressed. A new vision for Stretford needs to be captured.	
1185	104	<p>A bespoke SPD should be tailored solely to ensure that any planning risks or opportunities that are specific to the unique character of a specific locality are managed accordingly.</p> <p>Concern that a generic approach to planning, could lead to an oversight of specific needs within a particular location and as a result, risks to the character of a specialist area will not be managed appropriately.</p>	Comments noted.
1185	106	<p>SPDs should have the capacity to be prioritised in order for the planning process to become more flexible. It is considered reasonable that in order to attract suitable development that some SPDs be given more weight than others.</p>	Comments noted.
1185	107	<p>The final SPDs should be accompanied with more information on the associated policies from within the Core Strategy.</p> <p>Concern that the SPDs, once completed, will not have enough supportive information from within the Core Strategy. Especially since the SPD and the Core Strategy are interrelated.</p>	The Trafford Core Strategy has been found sound and adopted in January 2012. The combined SPD1 Planning Obligations is based on sound policies from the Core Strategy.

Appendix 7 – A summary of the responses received to SPD3: Parking Standards and Design consultation and Council responses prepared to support the Core Strategy.

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Person ID	Comments ID	Summary Of Rep	Council Response
1019	135	The use of Sustainable Urban Drainage Systems (SUDS) will be incorporated into all parking areas.	Agreed minor change to wording
1026	202	- These should be incorporated into the highway and public transport SPD linked to the whole concept of sustainability rather than a set of rigid criteria to be applied no matter how good or bad the public transport provision is in any one area.	The car and cycle parking standards will be detailed in the Core Strategy. The SPD will provide guidance as to how the standards will be operated. Areas will be designated an Accessibility Area Type in accordance with the RSS. In addition a questionnaire will assist in determining levels of accessibility by public transport and what flexibility should be applied to the standards.
1035	124	Thank you for setting out the parking standard for theatres in the sui generis section of Appendix 1.	Comment noted
1039	103	Section 6.6 makes reference to the ACPO "Secured by Design" initiative to reduce crime, yet the current document has ignored the GMP's "Cycle Parking Design Guidance" (CPDG document) produced by Design for Security, a design-led crime prevention consultancy based within Greater Manchester Police (GMP). (Link provided in letter)	The majority of the guidance given in the SPD is similar to that in the GMP document and encourages the provision of secure cycle parking facilities.
1039	104	In comparison to Trafford's SPD 3: Parking Standards and Design, the CDPG document is far more comprehensive in terms of the detail relating to the location and installation of facilities, but also in respect to the level of cycle parking required at each development type, which is based on National best standards.	The level of parking required is contained within the core strategy policy and is based on those in the Regional Spatial strategy partial review. The Core Strategy is undergoing examination and it is not possible to change the standard at this stage.
1039	105	Additionally, section 11.1.1 stresses that 'Security will be a prime concern'. Given that the CDPG document has been produced by the Greater Manchester Police, is consistent with the principles of SBD and CPTED, and compliance achieves the Security by Design award, we feel that the GMP's CPDG document should form the basis for Trafford's Cycle Parking Standards in the Core Strategy and SPD3: Parking Standards and Design document.	As above it is not possible to change the standards in the Core Strategy at this stage
1039	106	The current proposal in Trafford's SPD3 appears to be based upon the "GM Cycle Parking Guidance". However, as far as we are aware, the guidance has not gone through any public consultation, and certainly not in Trafford via the Council's official consultation process or via its Cycle Forum. The current GM Guidance was out of date and well below national best practice when it was adopted into the GMLTP in 2006, and we feel therefore is not relevant for 2011-2015.	The proposed SPD is the subject of consultation and the standards have been the subject of consultation through the preparation of the Core Strategy

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1039	107	We believe that Trafford should be adopting best practice, and therefore support the GMP's CPDG.	The use of the GMP Cycle Parking Design guidance would confuse users. As stated above it is not possible to amend the cycle parking standards at this stage and users could be confused if only part of the document was Council policy
1039	108	However, one item that has not been included relates to the type of cycle lockers required i.e. vertical or horizontal. Vertical lockers are generally too small. GMPTE have now confirmed that their latest GMPTE "Cycle parking at transport facilities" standards will only allow horizontal lockers.	
1039	109	The SPD states that for motorcycles that "long stay facilities (more than 2 hours) the parking should be undercover". However for bicycles (section 11.2.2) "Cycle parking should preferably be under cover but this is not essential". We would therefore like to see confirmation that long stay cycle parking should be under cover (as per motor cycles).	Wording to be amended accordingly
1045	351	In view of the fact that the reliability of the SA of the Core Strategy has come under some criticism by RLAM for the manner in which it considers the DG site and because the Council will only commence consultation on a revised version of the SA which responds to the criticisms of RLAM on the 18th April (the same date as consultation on the draft SPD will end) Peel contend that consultation on draft SPD is premature).	
1045	352	Peel welcome the flexibility provided within this paragraph for developers to provide a level of car parking provision which equates to the 'maximum' or a lesser or greater amount subject to justification being provided. This will enable each application to be assessed on its merits and respond to the particular characteristics of the locality.	
1045	353	This paragraph implies that the floorspace for uses which are ancillary to the main purpose of a development will be included within calculations of car parking requirements. Peel request that "will be" is replaced by "may be" such that the second sentence reads: "When calculating appropriate parking provision accompanying ancillary uses may be included within the overall gross area". This will allow each case to be assessed on its merits relative to the nature of the ancillary accommodation and the likelihood of it generating parking demand which is additional to the main development.	
1045	354	In our opinion a garage should be included within the calculations if its dimensions are sufficient to accommodate an average family car. While some future residents may choose to use the garage for car parking, others may not; a developer can do no more than make the opportunities available.	

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		Similarly the imposition of a condition on planning permissions requiring a garage to be retained for the parking of a vehicle is likely to fail the tests if Circular 11/95 regarding enforceability.	
1045	355	The relevant categories of development should be identified.	
1045	356	This paragraph encourages developers to avoid making provision of car parking on the front of residential properties where it would be detrimental to the character of an area. Taken together with limitations on whether garages may be counted as a parking space an overly rigid application of these requirements may make it extremely difficult for developers to achieve required parking standards.	
1051	203	No comment	Noted
1073	240	<p>The Agency is encouraged by the aspirations of the SPD, 'to ensure that the level of car parking associated with a development proposal or use is appropriate in order to support a reduction in the reliance on the private car.' The Agency recognises the importance of parking levels as a determining factor in people's modal choice, and as such, support the aspirations of the SPD.</p> <p>An area of the proposed content of the SPD is 'interpreting most accessible, accessible and least accessible areas.' This work should be undertaken in parallel with the development of the LDF transport evidence base to identify which areas require public transport infrastructure intervention in order to improve accessibility. Improving accessibility via public transport, cycling and walking infrastructure should assist in promoting modal shift away from the private car and help reduce the global demand for parking provision.</p>	Welcome the support given to the proposed SPD.
1074	101	Section 6.6 makes reference to the ACPO "Secured by Design" initiative to reduce crime, yet the current document has ignored the GMP's "Cycle Parking Design Guidance" (CPDG document) produced by Design for Security, a design-led crime prevention consultancy based within Greater Manchester Police (GMP). (Link provided in letter)	
1096	170	No comment	Noted
1150	112	Maximum security is needed for pedal cycle parking if the use of this mode is to be encouraged, given that bikes seem more easily stolen than cars or motor cycles. The aim of reducing reliance on the private car is most welcome. (There is a typo in the Aim statement - surely should be: "reliance	Details will be provided regarding the types of cycle parking required for long and short stay cycle parking.

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		ON the")	
1182	110	The aim for this SPD to 'support a reduction in reliance of the private car' is very welcome. There should also be a requirement to provide cycle parking facilities at new developments as appropriate for the size and location of the development.	The level of proposed cycle parking will be set down in the Core Strategy and further information on the type of cycle provision will be given in the SPD.
1221	124	Indicates that the required level of parking will be based on the standards set out in Appendix 1 of the Core Strategy. Given that the Core Strategy is yet to be Examined we consider that it would be premature to adopt the SPD until there is sufficient certainty that the parking standards will be adopted in their current form.	The standards were not questioned at the Examination in Public of the Core Strategy and it is consequently unlikely that changes will be made to the standards found in Appendix 1
1221	125	Linked to this, we would query why the accessibility areas identified in the draft SPD do not align with those identified on Plan D1 in Technical Note 3. We would recommend that this is reviewed and further clarification added to the draft SPD and / or the definition of accessible areas should be amended so there is a consistent approach.	The accessibility areas are given in the Core Strategy Policy L4 and cannot be changed at this stage of preparation of the Core Strategy
1221	126	Of particular note in the 'Planning for Growth' Statement is the set of considerations for Local Planning Authorities which includes ensuring that they do not impose unnecessary burdens on development. It is clear that the Government is committed to fostering economic growth and will work to reform the planning system to ensure that it is capable of assisting this process. To this end, Steve Quartermain's letter confirms that the Statement can be treated as a material planning consideration and, as such, we consider that it would be appropriate to review the draft SPD in this light.	
1221	127	Whilst we accept the need for landscaping to be provided as part of new development including within areas of car parking, it is important that landscaping areas do not interfere with the free flow of vehicles within the car park or pose an unnecessary constraint to development. We are particularly concerned that paragraph 6.5.4 could restrict proposals for new development from coming forward and we would recommend that this is reviewed in light of the Government's recent 'Planning for Growth' aspirations.	
1221	128	Notwithstanding our comments above in respect of the prematurity of an SPD which includes Parking Standards which are still subject to independent Examination, we consider that it is important to make it clear that in some instances it is not appropriate to rigidly apply parking standards without careful consideration of proposal specific and site specific circumstances. In the case	The contents of the Government's document 'Planning for Growth' published in March 2011 are noted. The SPD is in accordance with this document. 'Planning for Growth' indicates that there will be a default position for the grant of planning consent for sustainable development. SPD3 encourages the provision of

		<p>of SEGRO's interests at Trafford Park, whilst it is in a location which is accessible by a variety of means of transport, including the Trafford Park Rail Station within a 20 minute walk, there are instances where specific tenants may require additional car parking facilities because of the nature of the development e.g. a hotel offering conferencing facilities in addition to guest bedrooms.</p>	<p>sustainable development and provides guidance as to how this can be achieved in respect of parking. The guidance is intended to help businesses submit planning applications that meet the Council's requirements and enable planning decisions to be expedited in line with the Government Statement.</p> <p>Although the SPD indicates that parking provision which meets the maximum standard will be appropriate in most circumstances. The SPD in para. 5.1.3 allows some flexibility if the applicant satisfactorily demonstrates what measures in respect of design, location or operation are to be taken to minimise the need for parking.</p> <p>The parking standard for hotels state that when ancillary uses such as conference centres are included the starting point will be that they are treated as additional to the general hotel use.</p>
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Appendix 8 – A copy of the Statutory Notice published in the Manchester Evening News relating to the Consultation Draft SPD1 Planning Obligations, SPD3 Car Parking Standards and SPD4 House Extensions.

