

**Summary of consultations received to Dudley MBC's draft
Parking Standards and Travel Plans Supplementary
Planning Document (SPD) (September 2006) and the
Council's proposed responses to the consultations**

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1. Access in Dudley and DCVS (Tina Boothroyd)

Summary of comments	Council's Response	Council's Further Action
<p>Nature of response: Supportive (with comments) (Paper version)</p> <p>Minimum parking allocations for disabled Blue Badge holders within 40 metres of main accessible entrance. Higher % if possible</p> <p>Accommodation for high vehicles for wheelchair users in car parks with twin gate space should be employed.</p> <p>We would also like to see the following:</p> <ul style="list-style-type: none"> • 10% disabled parking within 40m of main accessible entrance; • Places of public use i.e. Merry Hill and likewise. Policed car parking for prevention of unauthorised parking in blur bays and subsequent abuse of either badge holder or users. 	<p>Parking standards for disabled spaces should conform to or exceed minimum requirements specified in DfT guidance.</p> <p>Current height restrictions are in place to prevent use by unauthorised vehicles. It is not appropriate for the SPD to refer to height limits on car park entrances.</p> <p>Noted. This is an aspiration of the Council not something that could be enforced/ deliverable.</p> <p>The Council undertakes parking enforcement at its own car parks which includes unauthorised use of disabled spaces. The Council encourages operators of privately owned public car parks to ensure that disabled spaces are not used by unauthorised vehicles.</p>	<p>Modify SPD to ensure that parking standards for provision of disabled parking spaces for Blue Badge Holders conform to or marginally exceed the minimum standards recommended in DfT report "Inclusive Mobility".</p> <p>No change to SPD but the Council will investigate whether the use of height barriers at its car parks causes a significant problem for disabled users and review its draft parking strategy as necessary.</p> <p>No change.</p> <p>No change.</p>

2. Access in Dudley (Mr Jim White)

Summary of comments	Council's Response	Council's Further Action
<p>Nature of response: Supportive with conditions. (Limehouse Version)</p> <p><u>Section 11: Parking for Mobility Impaired People</u></p> <p>Para 11.1 – Standards for Parking for Mobility Impaired People ...</p> <p>Parking for people who are mobility impaired (must be a Blue Parking Permit Badge Holder).</p> <p>Parking spaces to be increased and levelled out at 10% across the board (i.e. 10 spaces – 1 dedicated disabled parking bay, 20 spaces – 2 disabled bays, 30 spaces -3 bays, and so on). Bays to be installed as 2004 Part M of the Buildings Regulations with level/ easy access to the pavement.</p> <p>Distance from the main entrance to be reduced to 40 metres and if above 40 metres, seating to be installed so that no mobility impaired person has to walk over 40 metres without a place to rest so complying with the requirements of the Blue Badge Parking Permit Requirements which the applicant has to state to get the badge.</p> <p>An additional disabled bay to be included for those who have larger type vehicles, such as transits, that have been modified to drive, for those mobility impaired people, from a wheelchair or scooter. Barriers need to be at a suitable height to let these vehicles pass. As such vehicles are now more commonly used it could be considered discrimination if there is not a bay for them to use and could leave a legal action against the owner/ installer of the parking area and DMBC.</p> <p>Bays to be policed efficiently by the owner to prevent</p>	<p>Accepted in principle.</p> <p>The SPD sets out standards for the provision of disabled parking spaces at car parks serving shops and buildings to which the public have access, visitor and public car parks. It also sets out standards for provision of disabled spaces on employee car parks and buildings such as hotels. These standards are consistent with the standards recommended in DfT report "Inclusive Mobility".</p> <p>The SPD provides design guidance which seeks provision of disabled parking spaces within 50 metres of main entrances of buildings (no more than a 100 metres round trip) and also guidance on design of ramps. These are consistent with DfT report "Inclusive Mobility"</p> <p>Current height restrictions are in place to prevent use by unauthorised vehicles. It is not appropriate for the SPD to refer to height limits on car park entrances.</p> <p>The Council undertakes parking enforcement at its</p>	<p>Modify SPD to clarify that disabled spaces are only to be used when a named blue badge holder is either the motorist or travelling with a carer.</p> <p>Modify SPD to ensure that standards for provision of disabled spaces conform to or marginally exceed the minimum standards set down in the DfT report "Inclusive Mobility" which indicates a minimum standard of 5% for employee car parks and 6% for public car parks.</p> <p>No further action.</p> <p>No change to SPD but the Council will investigate whether the use of height barriers at its car parks causes a significant problem for disabled users and review its draft parking strategy as necessary.</p> <p>No further action.</p>

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<p>misuse by those who should not be parking there. This tends to be mostly done by 4 wheel drive owners/ drivers who need more room than the normal size bay and any reduction of normal bay sizes will enhance this problem.</p> <p>Dropping off places only, with suitable level access to the pavement need installing at prominent buildings, shopping centres, and several at major out of town shopping complexes (such as Merry Hill) to allow for safe access and use by specialised taxis, Ring and Ride, Community Transport, Care Homes to drop off wheelchair and mobility impaired people close to main entrances – The vehicles must not be left in these dropping off areas.</p> <p>Parking bays on one way streets need to have bays both sides of the street so that those drivers who have to transfer to a wheelchair are not forced to transfer in the flow of traffic.</p>	<p>own car parks which includes unauthorised use of disabled spaces. The Council encourages operators of privately owned public car parks to ensure that disabled spaces are not used by unauthorised vehicles.</p> <p>Agreed in principle but not an issue for the SPD.</p> <p>Beyond the scope of the SPD – covered by the wider Parking Strategy.</p>	<p>Modify SPD to include reference to provision of dropping off points for mobility impaired.</p> <p>Review Draft Parking Strategy and include reference to design criteria/issues for provision of on-street disabled parking spaces in one-way streets as necessary.</p>

3. Dudley MBC, Gill Hunt, Business Travel Plan Advisor

Summary of comments	Council's Response	Council's Further Action
<p>Nature of response: Generally supportive (Paper version)</p> <p>The threshold for a travel plan is 100 dwellings. Is there any reason why 100 was selected as the threshold figure?</p>	<p>Noted.</p> <p>SPD should include indicative thresholds based on the DCLG/DfT Guidance on Transport Assessment - Draft – 07 August 2006 published since SPD was produced.</p>	<p>None</p> <p>Modify Table A in the Appendix to the SPD to clarify the indicative thresholds above which a travel plan is required and above which a Transport, Accessibility and Parking Assessment (TAPA) is required, based on the proposed thresholds in the DCLG/DfT Guidance on Transport Assessment - Draft – 07 August 2006. Also SPD to refer to the need to reviewed thresholds once final guidance is published by the government.</p>
<p>Developers may get around the 100 dwelling threshold by</p>	<p>Agreed in principle.</p>	<p>Amend the SPD to refer to exceptions where Travel Plans</p>

<p>submitting plans for the development of sites for less than 100 dwellings. In which case we should be considering having exceptions to this figure for sites where:</p> <ul style="list-style-type: none"> • Traffic is generated at peak times in a congested area or near to a trunk road junction or where there are other existing highway problems; • Traffic is generated in addition to traffic from other planned developments nearby and cannot be accompanied on the road network without causing congestion or other highway problems • There are significant concerns over road safety • Traffic, especially lorry traffic is generated late at night in a residential area (or where there are other noise pollution issues) • National air quality objectives are exceeded or the proposals are likely to cause an exceedance. • There are concerns about community severance. • Particular transport difficulties in relation to car parking are likely, especially if developments could cause road parking in residential areas. <p>Page 43 of <i>'Making Residential Travel Plans Work – Requiring a residential travel plan'</i> provides valuable information on fixed thresholds.</p>	<p>Noted.</p>	<p>may be required even though indicative thresholds have not been exceeded.</p> <p>No further action.</p>
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4. Highways Agency

Summary of comments	Council's Response	Council's Further Action
<p>Nature of response: Broadly supportive (Paper version)</p> <p><u>The draft SPD</u></p> <p>The Highways Agency broadly supports the Council's suggested approach towards the management and delivery of future car parking provision in the Borough. This view is subject to the adopted SPD fully reflecting the development of a regional parking strategy (both in terms of baseline parking standards and the adoption of a car park charging regime that is consistent with that which may come forward as part of the RSS process).</p>	<p>The review of the RSS has not yet included the publication of a new parking policy. However, the SPD is consistent with currently published national and regional guidance and the direction of policy development.</p>	<p>No further action.</p>
<p><u>Parking Standards</u></p> <p>The Agency commends the SPD for recognising that parking provision that exceeds the maximum standards set out in the SPD will only be granted in circumstances where it has been demonstrated, through a transport assessment and travel plan, that a lower level of parking is not achievable.</p>	<p>Noted.</p>	<p>No further action.</p>
<p>Policy AM3 mentions that transport assessments should be produced in accordance with the Highways Agency's policy as set out in PPG13, Circular 04/2001 and the DfT document 'A New Deal for Trunk Roads in England, 1998'. The agency would however, wish to see reference in the SPD to the Highways Agency being included in part of the statutory consultation process for major applications and travel plans, in accordance with advice set out in Circular 04/2001 and emerging policy for the strategic road network.</p>	<p>Accept.</p>	<p>Amend SPD supporting paragraph to Policy AM3 in accordance with the HA comments. In addition, add a supporting paragraph in relation to Table A in the Appendix to the effect that the Highways Agency will be consulted on significant applications in accordance with advice set out in Circular 04/2001 and emerging policy for the strategic road network and that where a development is above the indicative thresholds for a Transport Assessment and Travel Plan and is located close to a motorway junction or a trunk road.</p>
<p>The Agency commends the SPD for encouraging local park and ride systems. However, it states that care should be taken to ensure that park and ride locations focus on public transport interchanges and not nodes on the strategic highway network (e.g. motorway junctions) in order to avoid junction hopping.</p>	<p>Noted. However the discussion of park and rides is beyond the scope of the SPD.</p>	<p>No further action.</p>

<p>The SPD indicates that maximum parking standards would be applied to different land uses, special needs cases and for operation parking for delivery vehicles. It also mentions that even though provision of long-stay car parking in Dudley and Brierley Hill has very little spare capacity during the day, standards should not be restrictive to the point that they discourage future business from locating in these areas. It needs to be established as to whether Dudley and Brierley Hill have at present a high presence of offices and other businesses.</p>	<p>Relates to the aspirations of the Black Country Study Sub Regional Study (Phase I of the Regional Spatial Strategy) - beyond the scope of the SPD.</p>	<p>No further action.</p>
<p>The SPD sets out reductions that should be applied to baseline parking standards for developments, which are, located in areas that have a medium and high accessibility for public transport. The Agency commends this approach but note however, that these reductions do not apply to retail and leisure developments. The Agency would also like to see the SPD apply the parking standard reductions to these types of uses, as they are likely to generate a high number of trips throughout the day.</p>	<p>Reductions in parking standards for retail developments where there is medium or high accessibility is not proposed in the SPD as currently there is insufficient evidence to justify what an appropriate reduction could be. Proposed parking standard for retail uses are consistent with PPG13 and the SPD indicates that parking provision for larger retail developments will be considered in the context of a Transport Assessment, Travel Plan and parking strategy for the centre. In addition, the SPD proposes that a charging regime be introduced at the Merry Hill shopping centre. This approach is considered appropriate</p>	<p>No change to SPD, but SPD to be reviewed in light of the Phase 2 Revision of the RSS which is expected to be adopted in Autumn 2008, and the introduction of parking charges at Merry Hill shopping centre.</p>
<p>The agency has a concern that a baseline standards for residential dwellings set out in table 9.1 of the SPD, are higher than the average of 1.5 off-street spaces per dwelling recommended by PPG3.</p>	<p>PPG3 links parking and design and recognises that car ownership (and hence parking needs) varies with age, household type, type of housing and location. It emphasises the need to limit parking spaces in new residential developments to achieve an average of 1.5 overall. This policy is designed to achieve higher residential densities in urban areas. However, this standard may be flexibly applied to recognise local circumstances and is not referred to in the current Consultation Paper PPS3.</p>	<p>No change to SPD, in light of PPS3 Published in November 2006.</p>
<p>The Agency commends the SPD for requiring developers to demonstrate how accessibility by non-car modes of transport can be improved for development in low accessibility areas, so that they be categorised to at least a "medium level".</p>	<p>Accept.</p>	<p>No further action.</p>

<p>user-friendly if the ‘types of initiative’ were consistent with the travel plans proposals identified in “<i>Diagram 4: A Guide to the Travel Plan Process</i>”</p>		
<p>The Highways Agency recommends amendments to Diagram 4 to bring it in line with DfT best practice [see page 5 of the Highways Agency Representation for suggested amendments].</p>	<p>Accept</p>	<p>Amend Diagram 4 in the Appendix.</p>
<p>The Council should note that the Highways Agency would wish to be involved in pre-application discussions for developments that would impact upon the strategic road network.</p>	<p>Noted.</p>	<p>Noted.</p>
<p>The Agency supports the SPDs requirement for developer contributions to be provided to the Council to cover the cost of monitoring. A mechanism will need to be established to ensure monitoring is maintained throughout the life of the travel plan and not just for the period of 5 years set by the Section 106 Agreement.</p>	<p>Accept</p>	<p>Amend the SPD refer to the need for on-going travel plan monitoring in a new Section 15 relating to securing and delivering Travel Plans and in a Travel Plan Checklist to be included in Appendix A.</p>
<p>A key element, which appears to have been overlooked, is the need for guidance on residential travel plans. The DfT good practice guide entitled <i>‘Making Residential Travel Plans Work’</i> recommends that a residential travel plan be prepared for developments with over 100 dwellings. The guidance advises that the travel plan be site specific with the inclusion of the following components;</p> <ul style="list-style-type: none"> • Site characteristics and design • Existing conditions • Long term management strategy • Car parking restraint • Provision of facilities that reduce the need to travel • Measures to encourage and promote sustainable transport • Clear targets • Monitoring Strategy • Enforcement Sanctions 	<p>Accept.</p>	<p>Amend the SPD to better describe the requirements for residential travel plans in a new Section 14 covering the scope and content of Travel Plans.</p>

5. Centro WMPTA

Summary of comments	Council's Response	Council's Further Action
<p>Nature of response: Centro welcomes and supports the SPD and the core objectives behind it. (Limehouse Version)</p>		
<p>It is noted that a phased approach to implementing travel plan measures is proposed and whilst this may have practical reasons, Centro would urge the maximum possible commitment to be made up front as it is more difficult to change travel habits once they have become established.</p>	Accept.	Amend the SPD through inclusion of a new Section 15 relating to securing and delivering Travel Plans and though statements in a Travel Plan Checklist in Appendix A to refer to the need for travel plans to be fully agreed at the earliest possible stage and for implementation to take place in a timely fashion to achieve the Travel Plan objectives.
<p>More restrictive parking standards are being applied to Merry Hill, Waterfront and Dudley town centre, whilst everywhere else baseline conditions will prevail. Whilst the economic driver behind this approach is noted, restrictive policy may also be applicable elsewhere on environmental and social grounds to combat the effects of congestion and to strengthen the local transport offer.</p>	Noted.	No further action – The SPD sets out more restrictive parking standards for the Merry Hill/Waterfront area and Dudley town centre, and that all areas may be subject to more restrictive standards in conjunction with the accessibility assessment. The standards in the SPD also enable a more restrictive approach in conservation areas.
<p>Accessibility frameworks and the possible use of Accession would be supported by Centro as a systematic and consistent means of assessing the accessibility of the site.</p>	Noted	Amend SPD to indicate that Centro support the use of an accessibility framework and possible use of Accession to assess accessibility.
<p>Appendix 1 contains the Accessibility Assessment form. Under the public transport section, scores are assigned according to bus frequency during the hours of operation of the development; however, bus frequencies can change during the day (e.g. peak or off peak periods) so the framework needs to reflect this.</p>	Accepted.	TAPA form in Appendix A to be modified to take into account varying bus frequencies during the day.
<p>Where parking is proposed above maximum levels, it is supported that a travel plan should be implemented to reduce demand for parking and encourage travel by more sustainable transport choices. Also, where parking has a role of serving the wider centre this is supported too.</p>	Noted	No further action.
<p>Para 14.4 refers to housing layouts and parking not always catering for the needs of pedestrians and vulnerable road users. This should be extended to include for public transport and its infrastructure as on-street parking can, on</p>	Noted.	Amend SPD to refer to the need for adequate provision for buses and pedestrian access to bus stops.

occasions, inhibit bus services through allowing insufficient space for manoeuvring buses, blocking bus stops or not allowing bus vehicles to straddle traffic calming measures.		
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6. Hunnington Parish Council

Summary of comments	Council's Response	Council's Further Action
Thank DMBC for keeping them informed of the progress of the SPD (Paper version)	None.	None.

7. Advantage West Midlands

Summary of comments	Council's Response	Council's Further Action
Nature of comment: Generally supportive (Paper version)		
Pillar 3 of the West Midlands Economic Strategy (WMES) refers to the regional transport strategy. It seeks to ensure that planning documents are created at the local level which will encourage parking and travel plan policy to be implemented by local authorities in their respective areas. The SPD seeks to elaborate on suitable travel and parking policy from the relevant Unitary Development Plan provisions to achieve suitable planning outcomes.	Noted.	No further action.
AWM welcome the aspects of the SPD which give effect to delivering lower levels of car commuting and requiring contributions from developers to achieving improved travel outcomes.	Noted.	No further action.
It is imperative that the local authority deliberate sufficiently with developers to ensure that proposed travel plans are realistic and deliverable.	Noted.	No further action.
Pursuant to the aspirations of the WMES, this planning document can deliver improved prospects for transport efficiency within the region.	Noted.	No further action.

8. English Heritage

Summary of comments	Council's Response	Council's Further Action
No comment. (Paper version)	None.	None.

9. Environment Agency

Summary of comments	Council's Response	Council's Further Action
<p>Nature of comment: Further information required. (Paper version)</p> <p>Crucial issues to the Environment Agency with respect of the SPD relate to drainage and pollution prevention.</p> <p>The Dudley area is mainly underlain by made ground with a high percentage of contaminated soils, hence any sustainable urban drainage systems (SUDs) that may be incorporated into a surface water drainage system should not include infiltration methods, unless investigation into the ground conditions proves that mobilisation of contaminants to groundwater will not occur.</p> <p>There should be no discharge of surface water to land, including to soakaway or any system of permeable paving unless the applicant can demonstrate that this will not lead to the mobilisation or movement of any containment present in land at or adjacent to the site.</p> <p>To prevent mobilisation of contaminants and pollution, all surface water drainage from car parking areas for 100 vehicles or more, must pass through oil interceptors designed to have their capacity with the area being drained, before discharge to sewers, soakaways or any watercourse. We also recommend an interceptor where commercial vehicles are parked.</p> <p>For car parking areas of 50 to 100 car, trapped gullies should be provided.</p>	<p>Noted but beyond the scope of the SPD.</p>	<p>No further action.</p> <p>No further action.</p> <p>No further action.</p> <p>No further action.</p>

10. Dudley MBC (Don MacDougall – Principal Road Safety Officer)

Summary of comments	Council's Response	Council's Further Action
<p>Nature of comment: SPD non-user friendly. (Paper version)</p> <p>Document should be compared with Sandwell's Supplementary Planning Document which is more informative and makes it easier for developers to clearly see what they may be required to provide regarding travel assessments and travel plans. It sets out standards that are unambiguous. The Dudley document would require constant reference to other documents.</p> <p>The document tends to quote bland catch all strategy statements, like 'improving health and reducing health inequalities ...' rather than provide clear ambiguous guidance, such as how these aims might be achieved through new developments.</p> <p>One area where which would benefit in specific guidance is in the provision of well located secure cycle parking for apartment residents who do not have garage parking. The ratio of facilities per unit should be open to discussion. In addition I should like to see well located cycle parking facilities for visitors.</p>	<p>Noted.</p> <p>Noted.</p> <p>Accept.</p>	<p>Amend SPD to remove ambiguity and to make more user friendly through clearer guidance on application of parking standards and clearer guidance on the need, scope and implementation of Travel Plans.</p> <p>No further action.</p> <p>No further action - The SPD includes standards for cycle parking in residential developments and guidance on siting and design of cycle parking.</p>

11. Federation of Small Businesses

Summary of comments	Council's Response	Council's Further Action
No comment.	None.	None.

12. Countryside Agency (Natural England)

Summary of comments	Council's Response	Council's Further Action
No comment.	None.	None.

13. South Staffordshire Council

Summary of comments	Council's Response	Council's Further Action
No comment.	None.	None.