

CONSULTATION STATEMENT –Draft partial revision of the Parking Standards Supplementary Planning Document (SPD) (September 2017)

In connection with the preparation of the Parking Standards (SPD) 2017, a Consultation Statement is required to demonstrate with whom the Council consulted and how they engaged with local people and other interested parties during the preparation stages of the SPD. The statement contains the following information:

- i) a summary of the organisations with whom the Councils consulted;
- ii) how those organisations were consulted;
- iii) a summary of the issues raised; and
- iv) how those issues have been addressed in the SPD.

A six week consultation on the revisions to the Parking Standards SPD 2017 took place from **23rd September 2016 to 4th November 2016**.

The following consultees were sent either a letter or email providing a link to the Council's website to view the SPD. Comments were invited on the draft SPD:

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| Statutory organisations and Prescribed bodies under Duty to Cooperate | 40 |
| Organisations/developers on Consultee database by email | Approx.1000 |
| Ward Councillors | 72 |

In addition to being published on the Council's websites, paper copies of the draft revised SPD were distributed to all main libraries throughout Dudley Borough, at the Council's planning offices reception at 4 Ednam Road Reception and Dudley Council Plus.

As detailed in paragraphs 178-181 of the National Planning Policy Framework, public bodies have a Duty to Co-operate on strategic planning issues that cross administrative boundaries. The prescribed bodies under Duty to Cooperate were therefore consulted in relation to the draft revised SPD.

A total of **6** representations were made on the draft revised SPD.

Parking Standards SPD- Consultation Responses

| Respondent | Page/Paragraph No | Summary of Response | Council response and proposed amendments to SPD |
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| Canal and River Trust | 8.24 (8.23 in the revised document) | In Para 8.24 the use of lighting to increase security is understandable, however this must be balanced around other impacts from lighting, especially in relation to canal or other biodiversity rich corridors, in order that no harm is caused to other interests such as nocturnal creatures and their foraging habitats. The SPD could be clearer about ensuring that lighting is directed away from more sensitive areas in order to protect other interests. Canal and River Trust consider that this can be done without prejudicing public safety. | <p>New sentence at the end of paragraph 8.23 to read “In sensitive locations i.e. nature conservation areas sensitive low level lighting will be encouraged.</p> <p>This sentence has been added in light of the comments above.</p> |
| Canal and River Trust | 8.4 | Para 8.4 could be more positive and wider ranging in terms of parking not being prominent in views from any public realm, not just the streetscene. | <p>The paragraph has been revised in the light of the above comments and new wording suggested in bold has been added to the paragraph.</p> <p>The new paragraph reads Provision (public and private) must be appropriately landscaped, surfaced and secure for both vehicles and individuals and provide appropriate access. Parking areas should ideally be visually observed to deter theft and vandalism, and should where possible be located between the point of access and the development they serve rather to encourage their use. There should be convenient, well lit and safe pedestrian routes between car parks and the main entrances to buildings.</p> |
| Canal and River | | Welcome the intentions to encourage the use of | Support welcomed. |

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| Trust | | the Trust's network of towpaths and waterspaces as off-road means of transport and recognise that they provide a wide range of benefits for local communities and their residents. | |
| Canal and River Trust | | Would like to see mechanism such as S106 to be contained in the document so that the developers are aware that where they seek to encourage the use of waterway network to support their development they may be asked to contribute to its upgrade so that it remains usable and fit for purpose. | This is included in the Travel Plan section of this SPD to some extent. We do not consider it to be the purpose of this document. The Council has an adopted Planning Obligations SPD which sets out section 106 requirements for different types of developments |
| Highways England | 1.2 | Whilst the SPD makes reference to flexibility and the need to take into account individual circumstances, the reference to ' <i>optimal numerical parking space provision</i> ' suggests that this is not open to discussion and agreement with the developer. | Change 1.2 to read This SPD.....delete optimal numerical parking space provision and replace with minimum and maximum parking standards. Comments noted and the paragraph has been changed accordingly. |
| Highways England | 2.4,(now 2.5) 3.1 and 4.15 | These paragraphs all make reference to the balance of needs that must be considered when deciding the appropriate level of parking provision. They mention the downsides of excessive parking provision, including ' inefficient use of land ', ' highway safety ' and ' increasing traffic congestion '. It could also include reference to the need to encourage sustainable travel and shift away from the use of private cars, as identified in the Black Country Core Strategy and National Planning Policy Framework. | The Council considers the paragraphs are appropriate as they explain the thrust and emphasis of the document and all the developments will need to comply with the requirements of the NPPF and the Core Strategy. The Council does not consider it necessary to repeat the national guidance in the SPD. |
| Highways England | 2.5 | This paragraph may be open to differing interpretation. It is not clear whether deviation from the optimum levels could allow a reduction in car parking provision as well as an increase. There could be more clarity over which circumstances would allow deviation from the optimum levels. | The word optimum replaced with sufficient - Chapter 3 has been revised to read Minimum Residential Parking Standards. Comments noted and changes have been made to the document. |

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| Highways England | 3.2 now 3.3 | The wording may better reflect that this is a guide to inform discussion, rather than stating ' <i>The Council will apply the following standards....</i> ' | Comments noted but no change is needed as the standards are based on the carefully considered evidence. |
| Highways England | 3.6 now 3.7 | In addition to innovative design solutions, the SPD should refer to innovative management techniques and mitigation e.g. car clubs, residents' parking schemes, shared parking facilities or other Travel Plan measures, which would reduce the requirement for car parking to be provided as part of a development. | It would be better to look at Travel Plan section. Paragraph 3.7 has been amended to read " Car parking provision can be provided in a variety of ways. Positive consideration will be given to innovative design solutions which deliver parking requirements safely and in the context of well designed layouts. This can include shared surfaces, innovative use of landscaping highway design solutions etc ". |
| McCarthy & Stone Retirement Lifestyles Ltd | | Retirement Living (Category II sheltered housing) has been defined as " <i>grouped flatlets to meet the needs of the less active elderly people.</i> " The key wording here is " <i>less active elderly people</i> " although residents are not normally so frail as to be wholly inactive. The residential parking standard does not differentiate between 'general needs housing' and specialist accommodation for the elderly. | Comments noted. Schemes for specialist accommodation will need to be supported by a Transport Assessment which will identify specific parking needs of that development. As such it is not necessary to set out separate standards for this type of development. No change is required. |
| McCarthy & Stone Retirement Lifestyles Ltd | | Would question Council's rationale behind the cycling standards in Figure 25 for ' <i>C2 Sheltered Housing</i> ' which stipulates a requirement for 1 space per every 5 units. As stated previously sheltered housing, in particular that which is C2 (such as Extra Care accommodation), is used by older people who tend to be frail and are likely to have mobility issues. It would be unlikely than an older person with good health and who cycles regularly will require such accommodation. | Schemes for specialist accommodation will need to be supported by a Transport Assessment which will identify specific cycle parking needs of that development. As such it is not necessary to set out separate standards for this type of development. No change is required. |

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| McCarthy & Stone Retirement Lifestyles Ltd | | Would respectfully request that the Council uses the opportunity provided by the review of the Parking Standards SPD to revisit the parking standards for older persons housing, or at least to acknowledge that flexibility in the application of its parking standards will be required for these forms of development. | Comments noted. Schemes for specialist accommodation will need to be supported by a Transport Assessment which will identify specific parking needs of that development. As such it is not necessary to set out separate standards for this type of development. No change is required. |
| McCarthy & Stone Retirement Lifestyles Ltd | | Would like to point out the approved South Gloucestershire Council Residential Parking Standards SPD. In that SPD the car parking standards for Extra Care accommodation are lower than those of Category 2 housing retirement housing-parking requirements of 1 space per every 2 dwellings and 1 space per 4 dwellings respectively. | Comments noted. Schemes for specialist accommodation will need to be supported by a Transport Assessment which will identify specific parking needs of that development. As such it is not necessary to set out separate standards for this type of development. No change is required. |
| Natural England | Whole of the document | No comments to be made to the document. | Comments noted. |
| Theatres Trust | Whole of the document | Sui generis uses such as theatres, taxi businesses, casinos, etc do not fall clearly under the categories listed in the tables in Appendix 1, given the relationship to the Use Classes used. It would be useful for them to be included, perhaps under a general 'all other uses' | Comments noted. The Council does not consider that these should be included along with different parking standards as they are sui-generis uses. Each development will be assessed on its individual merits and in will need to be compliant with the requirements of this SPD and other relevant guidance and legislation. |
| Dudley MBC Highways Officer | 2.4 now 2.3 | Paragraph 2.4 should be amended to read " <i>The purpose of the document is to ensure future developments provide sufficient parking that will not result in on-street parking congestion to the detrimental of the safe and efficient operation of the public highway</i> ". In implementing this approach, there has to be a balance so that there | Comments noted and welcomed and changes have been made to the paragraph 2.5 which now reads " <i>The purpose of the SPD is to ensure future developments provide sufficient parking that will not result in on-street parking congestion to the detriment of the safe and efficient operation of the public highway. In</i> |

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| | | <i>is not an over provision of parking in remote areas that would result in the inefficient use of land. Public safety will always be at the centre of the parking consideration as it is known child pedestrian accidents occur when walking or playing in the residential streets where they live due to on street parking causing a particular problem.</i> | <i>implementing this approach, there has to be a balance so that there is not an over provision of parking that would result in the inefficient use of land. Public safety will also be at the centre of the parking consideration”.</i> |
| Dudley MBC Highways Officer | 3.1 | Paragraph 3.1 should be amended to read <i>”The council recognises that ensuring the right amount of parking provision in the right place and to the right size is essential in the creation of our new residential developments both in terms of good scheme layout and design and also highway safety. The following standards to determine the minimum residential parking standards have been derived from earlier work undertaken by with Phil Jones Associates in association with the on behalf of the Council and have been altered further to extensive practice and evidence gathering.</i> | Comments noted and changes agreed. Paragraph 3.1 has been reworded to reflect these changes and now reads “The Council recognises that ensuring the right amount of parking provision in the right place and to the right size is essential in the creation of our new residential developments both in terms of good scheme layout and design and also highway safety. The following standards detailing the minimum residential parking standards have been derived from extensive practice, evidence gathering and feedback”. |
| Dudley Council internal Officers | 3.2 now 3.3 | This sentence should read <i>“The Council will apply the following standards in relation to residential development (houses):</i> | Comments noted and changes have been made paragraph 3.3 to read “The Council will apply the standards set out in Table 1 in relation to houses”. |
| Dudley MBC Highways Officer | Above figure 1 | Insert the following wording: <i>NB: It is known from the Government Guidance that 3 bed dwelling have potential of large long term parking growth and for this reason the Council will consider the implications of this and the potential for future on street parking.</i> | Comments noted and paragraph 3.2 has been amended to read “Developments that indicate likely on-street parking which would create or exacerbate issues of highway safety will not be supported”. |
| Dudley MBC Highways Officer | Heading before 3.3 now 3.4 | Should the heading read “Visitor Spaces for Houses—apartments. | Comments noted and heading has been changed to read “Visitor Spaces for Apartments”. |
| Dudley MBC | 3.3 now 3.2 | At the end of paragraph 3.3 (no 3.2) add this | Paragraph 3.2 has been amended to read |

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| Highways Officer | | additional line <i>“Developments that indicate likely on street parking on or adjacent to road junctions will not be supported.”</i> | “Developments that indicate likely on-street parking which would create or exacerbate issues of highway safety will not be supported”. |
| Dudley MBC Highways Officer | 3.4 now 3.7 | Add the following line to the end of Para 3.4 (now 3.7) <i>“Reduced standards for apartments in constrained parking areas where there is already on street waiting restrictions/prohibitions, such as in a town centre may be acceptable.”</i> | Comments agreed and changes made to the last line of the paragraph 3.7 to read “Reduced standards for apartments in constrained parking areas when there is already on street waiting restrictions/prohibitions, such as in a town centre may be acceptable”. |
| Dudley MBC Highways Officer | 3.5 now 3.9 | <p>Underline the last line <i>“<u>The Council reserves the right to condition garages for the use of parking only when it considers it necessary</u>”.</i></p> <p>Add the following text after this line: <i>Use of conditions to enforce against non use of garages for the parking of a car is unlikely to take place over a sustained period. It is therefore important that the correct standard is implemented rather than relying on enforcement which is unlikely to take place when weighed against other calls on enforcement officers’ time.</i></p> <p><i>It is know from a recent survey that almost no garages in new developments are used for the parking of vehicles. This results in convenient on street parking at road junctions and opposite or over adjacent drives causes neighbourly disputes to the detriment of pedestrian safety and the residential harmony.</i></p> <p><i>All 2 bed dwellings must have provide at least</i></p> | <p>The Council does not consider that it is necessary to underline the last sentence.</p> <p>That the addition of the wording necessary as we can only apply conditions that are “enforceable” and “necessary”.</p> <p>Table 1 clearly states that for 2 bed dwellings minimum of two parking spaces need to be provided.</p> <p>Table 4 sets out the minimum drive way length requirements.</p> <p>The document should be read as a whole and the Council does not consider it to be necessary to make these changes.</p> |

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| | | <p>2 external parking spaces regardless of garage provision.</p> <p>Driveways in front of garages must be at least 6.2m long to prevent overhanging of the pedestrian footway and allow sufficient maneuvering space for a car to be parked wholly on the drive while the garage doors are opened or closed. The 6.2m drive length will not be reduced regardless of the type of garage door that may change over time.</p> | |
| Dudley MBC Highways Officer | 3.6 (now 3.8) | <p>Considers that 'use of garages' above should be removed as they are not extensively being used and there is no realistic prospect of any conditions or convenient being regularly enforced.</p> <p>Houses of Multiple Occupancy needs to be included in the standards. It is suggested that a HMO needs to be treated as an independent dwelling with minimum parking standards based on 1 bed apartment or local census data of car ownership levels should be used to determine an appropriate HMO standard.</p> | <p>The Council cannot reinforce these standards as there is no baseline data to support this provision.</p> <p>HMOs are given its own heading Houses in Multiple Occupancy (HMO) and the preceding paragraph 3.8 reads "For Houses in Multiple Occupancy (HMO) in places that are considered to be constrained parking areas such as district, strategic and town centres no parking provision will be required. However in all other locations each development will be assessed on its own merits".</p> |
| Dudley MBC Highways Officer | 4.3 now 2.5 | <p>Amend the last line to read as follows As such, maximum car parking standards will be applied for non-residential developments that reflect sustainable accessible locations and any overspill on street parking will not be detrimental to the safe and efficient use of the adjacent public highway.</p> <p>Add the following text at the end Developers will be required to justify their parking provision</p> | <p>Agree to the changes and have been made at the last line of 2.5 which now reads "As such, maximum car parking standards will be applied for non-residential developments that reflect sustainable accessible locations and any overspill on street parking will not be detrimental to the safe and efficient use of the adjacent public highway".</p> <p>The Council does not consider that the additional text is needed as each development will be</p> |

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| | | <i>with reference to a combination of maximum standards, actual surveys from similar developments or with reference to parking accumulation data bases to minimise overspill parking on the adjacent highway. The Council should be consulted to determine the best practice for each type of land use.</i> | assessed on its merits alongside the guidance contained in this SPD which requires the developers to demonstrate the parking provision for their developments. |
| Dudley MBC Highways Officer | 4.6 now 4.3 | The heading should read Transport Assessment and Travel Plan (TA/TP) <i>DTp Safety Audit requirements?</i> | This is considered unnecessary as the SPD does not detail DTp Safety Audit requirements. |
| Dudley MBC Highways Officer | 4.12 now 4.9 | Paragraph 4.12 should be amended to read The quantum of parking available in each centre will be monitored and the maximum parking standard may vary over time for similar developments dependent on under or over-provision <i>and how convenient any over provision of parking there is to the development. As a guide, a distance of up to 400m or 5 minutes walking distance is considered to be the maximum for convenience.</i> | Comments noted and paragraph 4.9 has been amended to read: <i>“The quantum of parking available in each centre will be monitored and the maximum parking standard may vary over time for similar developments dependent on under or over-provision and how convenient any over provision of parking there is to the development. As a guide, a distance of up to 300m or 5 minutes walking distance is considered to be the maximum for convenience”.</i> |
| Dudley MBC Highways Officer | 6.1 | Paragraph 6.1 should be amended to read <i>“Overlooked, well lit, secure and undercover cycle parking facilities should be incorporated into any developments that have the potential to attract cyclists. Cycle parking should be located in positions that will be convenient to encourage their use and where possible within the building. The provision of shower facilities plays an important role in encouraging people to cycle. Staff cycle parking provision should ideally be in a separate secured area away from the general public”.</i> | Comments noted and changes have been made to paragraph 6.1 which now reads <i>“Overlooked, well lit, secure and undercover cycle parking facilities should be incorporated into any developments that have the potential to attract cyclists. Cycle parking should be located in positions that are convenient to encourage their use and where possible within the building. The provision of shower facilities plays an important role in encouraging people to cycle. Staff cycle parking provision may be in a separate secured area away from the general public”.</i> |

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| Dudley MBC Highways Officer | 6.3 | Paragraph 6.3 should be amended to read <i>“The most satisfactory type of cycle parking is provided by multi cycle locker units for staff long stay or for visitors the universal secure and covered Sheffield Stand design which can accommodate two bicycles on either side with a distance separation between stands of 1 metre (see Figures below) . These should be located in positions that are convenient to the main visitor entrances”.</i> | Comments noted and changes have been incorporated in paragraph 6.3 to read <i>“The most satisfactory type of cycle parking is provided by multi cycle locker units for staff long stay or for visitors the universal secure and covered Sheffield Stand design which can accommodate two bicycles on either side with a distance separation between stands of 1 metre (see Figures below). These should be located in positions that are convenient to the main visitor entrances”.</i> |
| Dudley MBC Highways Officer | 8.2 | Add the following wording <i>“They must be the right size bays and the parking layout should provide reasonable access without being contrived (right no, right size, right place)”.</i> | Agree with the comments and bullet point 3 of paragraph 8.2 reads <i>“Design bays to be of appropriate size and parking layout to provide reasonable access without being contrived”.</i> |
| Dudley MBC Highways Officer | 8.4 | Paragraph 8.4 should be amended to read <i>“Provision (public and private) must be appropriately landscaped, surfaced and secure for both vehicles and individuals and provide appropriate access. Parking areas should ideally not be prominent in views from the street or elsewhere in the public realm. Parking areas should always be visually observed to deter theft and vandalism, and should always be located between the point of access and the development they serve rather to encourage their use. There should be convenient well lit and safe pedestrian routes between car parks and the main entrances to buildings”.</i> | Comments noted and the Council has amended the sentence to read <i>“Parking areas should ideally be visually observed to deter theft and vandalism, and should where possible be located between the point of access and the development they serve rather to encourage their use.</i> It may not be possible in all situations to achieve the above. To provide flexibility we consider the above wording is appropriate. |
| Dudley MBC Highways Officer | 8.6 | Add the following to paragraph 8.6 <i>“Detrimental highway impact of not providing sufficient and convenient off street parking.”</i> | Comments noted and changes made to paragraph 8.6 to read <i>“Detrimental highway impact of not providing sufficient and convenient off street parking.”</i> |

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| Dudley MBC Highways Officer | 8.7 | Paragraph 8.7 should be amended to read <i>“These issues may present a physical constraint or opportunity in the parking provision and may also identify if the type of development being proposed is consistent with the site context which may in turn warrant a separate parking design solution that should be discussed in advance with the Council.</i> | Comments noted and the additional wording has been added for clarity and consistency. |
| Dudley MBC Highways Officer | 8.8 | Paragraph 8.8 should be amended to read <i>“The amount of parking required is directly proportional to the total floor area of a development. As the density of a development increases, it becomes more difficult to achieve the primary design requirements. The assessment of appropriate residential density in any development site should comply with the Council’s ‘New Housing Development SPD’ to ensure appropriate density in all new residential development that includes the need to provide appropriate levels of off street parking.</i> | The Council does not consider this is necessary as the guidance in the New Housing Development SPD will be taken into account on the residential development in the Borough. |
| Dudley MBC Highways Officer | 8.11 | Paragraph 8.11 should be amended to read <i>“Designers should be mindful that unless there are no other appropriate and well-designed alternatives the following solutions will likely be unacceptable:-</i> Rear parking courtyards (consideration needs to be given to setting this section out differently) <i>Inconvenient and remote parking (i.e. not</i> | Agree with the comments and changes made to Para 8.11 for clarity. Paragraph 8.11 has been amended to read <i>“Designers should be mindful that unless there are no other appropriate and well-designed alternatives the following solutions will likely be unacceptable:-</i> Rear parking courtyards (consideration |

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| | | <p><i>directly overlooked, not between the highway and the main pedestrian entrance and more than 10 m from the property in residential developments)</i></p> <p><i>Solutions that result in large surfaced parking areas that front onto the public realm Family houses with only one external parking space</i></p> <p><i>Parking that obstructs the main pedestrian entrance</i></p> <p><i>Layouts that will result in more convenient on street parking at road junctions</i></p> <p><i>Tandem parking bays that are more than two parking bays deep</i></p> <p><i>And drives that are within junction radii.</i></p> | <p><i>needs to be given to setting this section out differently)</i></p> <p><i>Inconvenient and remote parking (i.e. not directly overlooked, not between the highway and the main pedestrian entrance and more than 10 m from the property in residential developments)</i></p> <p><i>Solutions that result in large surfaced parking areas that front onto the public realm Family houses with only one external parking space</i></p> <p><i>Parking that obstructs the main pedestrian entrance</i></p> <p><i>Layouts that will result in more convenient on street parking at road junctions</i></p> <p><i>Tandem parking bays that are more than two parking bays deep</i></p> <p><i>And drives that are within junction radii.</i></p> |
| Dudley MBC Highways Officer | Heading Design Principles for all New Developments | Second bullet point should be amended to read “ <i>The selection of ‘on plot’, ‘off plot’ and ‘on-street’ parking should be according to functional requirements, road safety, emergency and service vehicle access, site condition, location, character of the area and topography</i> ”. | Agree with the suggested changes and these have been incorporated in the document. |
| Dudley MBC Highways Officer | Heading Design Principles for all New Developments | Third bullet point should be amended to read “ <i>Parked cars should not be allowed to dominate the street and space.</i> (you have got to accept the parking of residents cars is a necessary evil therefore how best to accommodate within the plots) <i>Parking areas should be provided in</i> | The Council not consider that this change should be made as in some instances it may not be possible to provide parking between the plots. Each development will be judged on its own merits for parking provision both on plot and off street.parking. |

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| | | <i>between the plots they serve or on the frontage in positions which mature landscaping can screen and break up cumulative effect”.</i> | |
| Dudley MBC Highways Officer | Heading Design Principles for all New Developments | Fourth bullet point should be amended to read <i>“Create active frontages between the building and the street for safer, friendlier streets. (an active frontage is a parking area rather than landscaping which could be considered to be passive)” .</i> | The Council does not consider that this change is required as it does not add any value to the existing text. |
| Dudley MBC Highways Officer | Heading Design Principles for all New Developments | Seventh bullet point <i>“Indicating parking bays through change of surfacing material rather than painted white lines. (unlikely to be acceptable within the adopted highway as it will result in additional highway maintenance costs”.</i> | No change required as there is no evidence to prove that this is the case. |
| Dudley MBC Highways Officer | Heading Design Principles for all New Developments | Eighth bullet point should be amended to read <i>“A landscape scheme should form part of all parking designs from the outset. Street furniture and planting, including trees, can be used to constrain pavement parking. (minimal to zero landscaping within the public highway due to ongoing maintenance costs”.</i> | No change as we do need to provide some landscaping and we can't encourage minimal or zero landscaping in new developments. No change due to the need to provide landscaping in developments is appropriate |
| Dudley MBC Highways Officer | Heading Design Principles for all New Developments | <i>“Tandem parking up to a two car depth is ideal in residential situations where parking can be provided adjacent to dwellings and also maintains frontage which is non-car dominate”..</i> | Accept the change and amendments have been made to the SPD. |
| Dudley MBC Highways Officer | 8.13 | The depth of parking areas in front of dwellings should be designed to accommodate the full length of vehicles, i.e.: 1 car or 2 cars taking into account additional drive length will be required in front of garages and space for circulatory movement for wheel chair users. Failure to do this can result in vehicles overhanging the footpath causing obstruction for pedestrians. | Comments noted and agreed and required changes made as this will help improve pedestrian safety. |

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| Dudley MBC Highways Officer | 8.15 | The first line should be amended to read <i>“For garages to be considered as practical parking spaces they should be a minimum of 3m x 6m internally with no piers protruding into this space””.</i> | Paragraph 8.15 has been moved to 3.5 under heading Garages so that the information is at one place. |
| Dudley MBC Highways Officer | Figures 11 and 12 | The heading of the figure should be amended to read <i>“Residential design providing on plot, secure, overlooked and convenient parking for residents, minimum drive length of 6.2m in front of garage doors, non car dominated street frontage allowing surveillance onto the street (Density suitable for inner and outer urban areas).”</i> | The suggested change is accepted and included in the Figure heading. It should be noted that Figures 11 and 12 have been moved to page 11 and are now Figures 3 and 4. |
| Dudley MBC Highways Officer | Figure 14 | I would suggest a residential drive parking layout is provided that shows it would not be acceptable for a) a drive to be accessed into a road junction, b) parking bays on plots adjacent to a road junction are not adjacent to the main pedestrian access to the house thus encouraging on street parking and c) parking in a forward or junction visibility zone) Large houses 4 beds or more should not be encouraged adjacent to turning facilities , road junctions or bends due to increased potential for on street parking | Comments noted and new figure 14 inserted for Layouts for residential developments. |
| Dudley MBC Highways Officer | 8.17 | Para 8.17 should be amended to read <i>“Developers are encouraged to provide shared surfaces and street designs that break the dominance of the vehicle. To this end, on street parking is a useful tool and can be designed to provide a parking facility and at the same time helping to form deviations in the carriageway that encourage reduced vehicle</i> | Comments noted. The word “shared surfaces” has been removed from first line in Para 8.17. |

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| | | <p><i>speeds, improve road safety and provide an enhanced street environment for everyone. (this is a contradiction, shared space is not supported by disabled groups and is less likely to hide the car. The future maintenance of the street is a significant factor in highway adoptions)</i>".</p> | |
| Dudley MBC Highways Officer | 8.18 | <p>Para 8.18 should be amended to read "<i>To avoid the visual impact of a large cluster of parked cars, breaks or build- outs should be included in lines or rows of on-street parking bays every 2/3 spaces. These parking bays could be punctuated with landscaping or street furniture. Planting areas should be at least 1 metre wide to add effectively to the character and quality of the street-scene. (unlikely to be acceptable to the HA where these streets are to be adopted as highway maintainable at public expense. I would suggest we work together where both highway and planning requirements can be accommodated and be adoptable).</i>"</p> | <p>Comments noted.</p> <p>The word "every 2/3 spaces" has been removed from line 2 in Para 8.18</p> |
| Dudley MBC Highways Officer | 8.20 | <p>First line of this Para should be amended to read "Rear parking courtyards should only be considered where there are no other alternatives and where there are existing Highway constraints that will restrict on street parking".</p> | <p>Comments noted and agreed and incorporated in the document.</p> |
| Dudley MBC Highways Officer | Chapter 9 | <p>Do not have TP person.</p> | <p>This is an issue beyond the remit of this document.</p> |
| Dudley MBC Highways Officer | 10.4 | <p>The heading should be amended to read <i>Safe Routes and Zones to schools</i> Para 10.4 should be amended to read "<i>For residential developments, and new schools and school extensions safe routes/zones to schools should be identified and improvements made that</i></p> | <p>Comments noted and agreed and incorporated in the document.</p> |

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| | | <i>will encourage non car trips to schools”.</i> | |
| Dudley MBC Highways Officer | Figure 25 | Each development should provide at least 1 space plus a shower facility for staff when the floor areas are less than the ratios above. | The Council does not consider this to necessary as it relates to minimum standards anyway. |