

**Table of representations on Parking Standards, TAs and TPs Supplementary Planning Document**

<b>Section/ paragraph/ Page/ heading</b>	<b>Objector/ Comment Ref. no</b>	<b>Summary of representation</b>	<b>Officer response</b>	<b>Officer recommendation</b>
<b>TITLE</b>				
Title	Oxford Brookes University (West Waddy)	Title is a little misleading, as the SPD cannot and does not change these. Suggest alternative titles: "Transport Assessment, Travel Plans, Car Parking and Pedestrian and Cycle Facilities", or "Sustainable Travel Measures".	The title "Parking Standards, Transport Assessments and Travel Plans SPD" has been used for the formal consultation draft document, and is now established. It would cause unnecessary confusion to alter the title at this stage of production.	Recommend no change.
<b>WHOLE DOCUMENT</b>				
Whole doc	McCarthy and Stone (Agent: Planning Bureau Ltd)	Something as important as sheltered housing should not have been missed out of the SPD.	Objector acknowledges that parking standard for sheltered housing and retirement homes is included in the OLP. It is therefore unclear what change is sought to the SPD which would add any value to the standard already set out in the OLP.	Recommend no change.
Whole doc	British Parking Association	Do not normally give an opinion on local issues, however Position Papers attached for info.	Relevant content of attached documents has been noted.	n/a
Whole doc	Gosford and Water Eaton Parish Council	Question whether Oxfordshire County Council are in agreement with draft SPD, given disagreements between the Councils on where development is located.	Oxfordshire County Council were fully involved with the preparation of the SPD, and have indicated broad support in their consultation response.	Recommend no change.

Whole doc	Gosford and Water Eaton Parish Council	Has a 'roof tax' for residential development located near the proposed Oxford-Bicester-Milton Keynes-Cambridge railway line been considered?	This is beyond the remit of the Parking Standards TAs and TPs SPD. The draft Planning Obligations SPD sets out standard contributions which will be expected towards strategic highway improvements relevant to Oxford. Oxford City Council's forthcoming Core Strategy is likely to refer to strategic transport issues.	Recommend no change.
Whole doc	Gosford and Water Eaton Parish Council	How will the A34 be traffic managed without creating more traffic on the County road network?	This is beyond the remit of the Parking Standards TAs and TPs SPD. Responsibility for management of the strategic road network lies with the Highways Agency and Local Highway Authority. Oxford City Council's forthcoming Core Strategy is likely to refer to strategic transport issues.	Recommend no change.
Whole doc.	Highways Agency	The HA would prefer the reduction of car parking provision as part of the wider town centre transport management strategy which provides sustainable travel alternatives.	The draft SPD seeks not to permit increases in private non-residential parking in both the City and District centres (paragraphs 107 and 108). This reflects the objectives of the Oxford Transport Strategy. Car-free and low-car residential development is also supported where appropriate, and particularly in central Oxford (paragraphs 64-74).	Recommend no change.
Whole doc.	Highways Agency	Demand associated with specific developments should be carefully managed, such that parking provision becomes the residual output of the sustainable planning process, which should take every opportunity to encourage the	The draft SPD wholeheartedly follows the principles outlined by the objector. The draft SPD sets out a robust and detailed framework for requiring Transport Assessments and Travel Plans, tools which ensure that opportunities for reducing travel demand by private car are fully considered. Parking provision below maximum	Recommend no change.

		provision of sustainable travel modes. Parking standards should set a maximum level of parking, and policy statements should clarify that opportunities to reduce parking below these levels should be sought in each case.	standards is encouraged for commercial development and, where sustainable and appropriate, for residential development. The adopted OLP sets out maximum car parking standards for all types of development.	
Whole doc.	GOSE	It is always helpful to provide full details of where/how evidence base and other contributory/linked material can be viewed	Where the draft SPD refers to a particular source of evidence, this is clearly referenced. Further sources of useful contributory information are listed in Appendix 7 and also in Appendix 3 regarding TPs.	Recommend no change.
Whole doc.	GOSE	You may wish to reflect on producing greater consistency between SPDs. For example the Parking Standards SPD includes "Useful Sources of Information" and the policies it is intended to supplement, the Planning Obligations SPD does not.	Comment noted in respect of Draft Parking Standards, TAs and TPs SPD; given other comments from GOSE, it is assumed however this should be addressed through addition to the Planning Obligations SPD. Officers will liaise further in preparing final drafts of both documents.	Recommend no change.
Whole doc.	Oxfordshire County Council as Local Highway Authority	The draft SPD should refer to the following document: Manual for Streets (DCLG formally ODPM), which is in draft form and due to be published next spring.	Additional text will be included to acknowledge the imminent publication of this document.	Add text to paragraph 80 final sentence: "Government guidance on parking design issues can be found in <u>"Manual for Streets) (due to be published Spring 2007 by</u>

				<u>DCLG/DfT</u> ), and further guidance in “Car Parking: What Works Where” (English Partnerships, 2006).
Whole doc.	Oxonian Cycling Club / Graham P Smith	Concern regarding the conflation of ‘good urban design’ and no parking (p7), which is quite naïve and unfair if pursued with too great zealously. Concerned at relative distance between the SPD and Highway Authority’s actions, re little done to promote cycling, yet SPD proposes limitation on modal choice.	Unclear as to which parts of draft SPD this objection refers to. Overall, the draft SPD supports balancing the principle of restraining private car use, and of providing the choice of car-free or low-car development in appropriate circumstances, with people’s practical needs and rights regarding car ownership. The draft SPD strongly supports increasing the attractiveness of cycling, a principle shared with the Local Highway Authority.	Recommend no change.
Whole doc.	Cyclox + Highfield Residents’ Association	Desirable standards should be applied retrospectively to existing existing premises, e.g. those developed before existing standards were adopted. e.g. existing sites with, say >100 staff should have a suitable TP.	There is no realistic means of the City Council applying any planning requirements retrospectively where there is no application submitted (unless relating to enforcement of a planning condition or legal agreement).	Recommend no change.
Whole doc.	Cyclox + Highfield Residents’ Association	Draft SPD makes frequent reference to “environmental” or “highway safety” considerations, but does not mention “community disruption/degradation” as an undesirable by-product of extra traffic – it ought to.	Suggested additions to wording not specific, and in any case would not affect the implementation of the SPD; community considerations are implicit throughout the whole document.	Recommend no change.

Whole doc.	Cyclox + Highfield Residents' Association	"Environmental" is a loose word and could refer to large global scale or local (street environment). These two meanings should be distinguished and spelt out.	It is not necessary for the SPD to discuss at length the different meanings of 'environmental' which will be interpreted in the context used (generally at local scale in the case of this SPD).	Recommend no change.
Whole doc.	Cyclox + Highfield Residents' Association	The SPD makes little reference to projections to the reasonable foreseeable future. e.g. 'key workers' applicable to a planning application where use may change as housing changes hands.	The SPD will clarify adopted OLP policy, but takes account of evidence of changing circumstances, e.g. residential car ownership and discourse on policy implications of this. Comment on key workers is not relevant to this SPD.	Recommend no change.
Whole doc.	Cyclox + Highfield Residents' Association	Little thought has been given to parking electrically-powered single-rider transport, which is likely to be increasingly predominant in future for the able-bodied. These may be similar to requirements for PTW.	It is not possible for the SPD to predict "futuristic" forms of single-rider transit and what form these may take. If variations on the traditional bicycle become more common in future, this may be taken into account in revised DPDs and/or SPDs.	Recommend no change.
Whole doc.	Cyclox + Highfield Residents' Association	There is plenty of scope for retrofitting the standards referred to in the SPD to existing major developments, and the SPD should point this out. This is particularly true where a new development involves a nearby site that does not form part of a planning application.	There is no realistic means of the City Council applying any planning requirements retrospectively where there is no application submitted (unless relating to enforcement of a planning condition or legal agreement). (Second part of comment dealt with in relation to later objection.)	Recommend no change.
Whole doc.	Cyclox + Highfield Residents' Association	Many aspects of draft SPD highly commendable & welcome, e.g. on TP joint working and development; car clubs; priority for street environment; unallocated parking;	Support noted on all of these points.	No change requested.

		garage design; cumulative impact of separate sites to be dealt with by TAs/TPs; support for cycle hubs; PTW specifications; covered secure residential cycle parking; non-residential cycle parking distinctions; SA outcome, and several others.		
<b>Section 1: INTRODUCTON</b>				
Paragraphs 1-8	SEERA	Wish to see the introduction section set out more clearly how regional policies have been taken into account in the document.	Paragraph 2 of the draft SPD states that the document is written in the light oof such material as current national, <i>regional</i> and strategic guidance. An overview of adopted regional policy is set out in paragraphs 6 and 7. However it is unnecessary to repeat regional policy in an SPD.	Recommend no change.
Paragraphs 6-7		Wish to see paragraphs 6-7 changed to acknowledge the fact that RPG9 (as altered) and the Regional Transport Strategy, which include maximum parking standards, are now part of the development plan.	Wording change suggested in response to this comment. Grammatical error in paragraph 7 also corrected.	Paragraph 6: add to first sentence: <u>"..., and as such forms part of the development plan."</u>  Paragraph 7: insert in first sentence: "...is to replace RPG9 as the Regional Spatial Strategy <u>as part of the development plan,</u> and <u>has been</u>

				submitted in draft form...”
Paragraph 2	Oxonian Cycling Club / Graham P Smith	Oxfordshire County Council policies are not included here yet it is they who control the highway and the unsatisfactory situation for people who choose to cycle.	Paragraph 8 refers to the adopted Oxfordshire Structure Plan 2016 and outlines relevant policy therein. The SPD cannot change detailed County Council strategies and spending plans relating to provision for cyclists.	Recommend no change.
Paragraph 3	Oxonian Cycling Club / Graham P Smith	Sustainable development must include social sustainability and the thrust of this SPD will be to segregate rather than sustain communities by crude limitation of car ownership/use.	The approach of the SPD is in line with Government and Regional guidance which recognise choice of travel mode as a key part of sustainable development. Both Government guidance (e.g. PPG13) and the Regional Transport Strategy also support restraint-based parking measures appropriate to location as supporting this aim.	Recommend no change.
Paragraoh 5(i)	Oxonian Cycling Club / Graham P Smith	Reducing the need to travel is not supported by Oxfordshire County Council guidance which does not identify the places people may wish to travel to and their location, which for non-car travel has always been locally accessible and along busier roads other than in ‘centres’.	The SPD cannot change County Council policy, however reducing the need to travel is supported by Government and regional guidance, and also the adopted Structure Plan (e.g. Policy G1).	Recommend no change.
Paragraph 5(v)	Oxonian Cycling Club / Graham P Smith	Note that draft PPS3 refers to expected car ownership in different locations, not a limit.	Noted as set out in draft SPD.	No change requested.
Paragraph 5	Highfield Residents’	PPG3 standard of maximum 1.5 off-street car spaces per dwelling	Adopted OLP standards set out residential parking standards specific to Oxford. The draft	Recommend no change.

	Association	should be lower, given what is desirable and currently practiced.	SPD encourages developers to explore all realistic opportunities to revise down parking provision from maximum standard (e.g. paragraphs 60-63 of draft SPD).	
<b>Section 2: TRANSPORT ASSESSMENT (POLICY TR.1)</b>				
'Policy TR.1 Transport Assessments'	Gosford and Water Eaton Parish Council	Traffic assessments accompanying planning applications should consider the surrounding road network.	Guidance on the scope of a Transport Assessment appropriate to a given proposal is given in the draft SPD. The scope set out for full TAs does not rule out considering the highway network outside Oxford's boundaries.	Recommend no change.
'Policy TR.1 Transport Assessments' & 'Policy TR.2 Travel Plans'	Highways Agency	Sustainable measures that are offered through TAs and TPs should be secured via appropriate planning mechanisms, and TPs should specifically require the consideration of targets, monitoring, incentives for compliance and a funding stream to maximise their potential for success.	Paragraph 15 of the draft SPD makes clear that a TA should provide for a package of measures to reduce the role of car travel to the site, which will be additional to any strategic transport contribution required (reference made to Planning Obligations SPD). Paragraphs 38 – 46 of the draft SPD set out guideline mechanisms for monitoring of targets and enforcement should targets not be met.	Add to paragraph 15: "All such measures may be secured or sought through appropriate planning conditions or legal agreement."
Paragraph 11	Arlington Business Parks Partnership (GB) Ltd (GVA Grimley)	Cumulative impact is potentially extremely difficult to measure, particularly in the case of proposed developments that may be outside the control of an individual developer. Further clarification requested on meaning of 'cumulative impact'. Further guidance requested on what calculations can be reasonably expected in determining	Acknowledged that some cumulative impacts may not be quantifiable where taking account of developments outside of an individual developer's control. However this should not rule out carrying out a qualitative assessment of cumulative impact to take account of existing development, and also having general regard to development proposals or site allocations elsewhere in the vicinity. Potential limitations of the TA may be included in early scoping discussions with the City and County Councils.	Add wording to final sentence in paragraph 11, to read: "The cumulative impact of all existing and proposed development should therefore be considered as



		cumulative impact when considering development (particularly proposed) outside of an individual developers' control.		<u>far as possible</u> as part of the TA process.
Paragraph 13 (flow chart)	Highfield Residents' Association	Circumvention of thresholds by dividing applications needs to be prevented. Other developments need to be specified as a material consideration, to prevent salami-slicing.	Paragraph 11 of the draft SPD cross-refers to OLP Policy CP.2 which deals with cumulative development impact, and states that the cumulative impact of all existing and proposed development should be taken account of.	Recommend no change.
Paragraph 14	Arlington Business Parks Partnership (GB) Ltd (GVA Grimley)	The phrases "generate unacceptable congestion" and "whether the development is acceptable in the proposed location" are ones that need further clarification. There are sites identified by the Council as having development potential located alongside existing congestion hotspots. Further clarification needed as to how the Council will treat TA submissions relating to already congested areas. Concern that unreasonable demands may be placed upon developers to alleviate existing congestion.	The wording referred to is taken from the adopted OLP which is already adopted policy. There is no suggestion in the SPD that developers will be expected to alleviate existing congestion. However it is reasonable that the Council and Local Highway Authority should expect information to demonstrate no significant adverse impact on existing transport networks (or appropriate mitigation measure to deal with these impacts), and also to demonstrate the overall sustainability of location and layout. This includes allocated development sites.	Recommend no change.
Paragraph 15	Arlington Business Parks Partnership (GB) Ltd (GVA Grimley)	The wording "address congestion" needs clarification, i.e. whether this means addressing additional or existing congestion.	A properly executed TA will clearly need to have regard to existing pressures on the highway network, however there is no suggestion in the draft SPD that developers will be expected to solve existing congestion problems.	Recommend no change.

Paragraph 15	Oxonian Cycling Club / Graham P Smith	Could remedial measures refer to off-site remediation?	Text change in response to objections.	Addition to paragraph 15 2 <sup>nd</sup> sentence: “In such cases, the TA should provide for a package of measures ( <u>on or off-site, or both</u> )...”
Paragraph 19 (box under)	Highfield Residents' Association	Change of use due to change of ownership should be allowed for. How is a TP to be sustained through decades after a new residential development comes into use?	Paragraph 19 relates to minor development for which a TP is unlikely to be justified. Unclear therefore as to what Objector is seeking.	Recommend no change.
Paragraph 20	British Waterways (South East)	Object that there isn't a fourth example covering “impact on the local footway/cycleway network” – this should be highlighted in this section.	Change made to 3 <sup>rd</sup> bullet under paragraph 20.	Paragraph 20 2 <sup>nd</sup> bullet: amend wording to: “ <u>highway quality and safety audit (to include all types of movement)</u> ”
Paragraph 21	British Waterways (South East)	Object that this section doesn't also seek a contribution towards providing or upgrading existing footways/cycleways	Change made to overcome objection.	Change 1 <sup>st</sup> sentence of paragraph 21: “...it may seek a contribution towards improving public transport, <u>and/or parking</u> ”

				controls, <u>and/or cycleway and footway improvements.</u> ”
Paragraph 28	Oxonian Cycling Club / Graham P Smith	Note that the ‘poor’ driver often has little choice in accessing employment by means other than the car.	Comment noted.	No change requested.
Paragraph 29	Oxonian Cycling Club / Graham P Smith	This whole list seems naïve. For whom should these ‘benefits’ accrue? The wider community is only benefited by an apparent lack of extra congestion, would that more positive outcomes were demanded.	The potential benefits highlighted for an employer is drawn from a national guidance and best practice evidence base. It also reflects experience observed locally having regard to organisations who have successfully implemented TPs.	Recommend no change.
Paragraph 30	Oxonian Cycling Club / Graham P Smith	Structure okay, all depends on the design detail.	Comment noted.	No change requested.
Paragraph 40	Oxonian Cycling Club / Graham P Smith	Effective liaison on TPs is likely to require a major change in County attitudes which are obviously not forthcoming.	The SPD cannot in itself change how the County Council liaises with external clients on these matters. However their input is considered crucial to delivering effective TPs, and reference should therefore be made in the SPD.	Recommend no change.
Paragraph 44	Oxonian Cycling Club / Graham P Smith	How will developers be contacted if targets not met? The fees could be punitive and the developer either put off at the beginning or long gone at the point of failure of	There is scope to include specific sanctions (as exemplified) in Section 106 agreements relating to TPs. This approach is suggested as best practice in ODPM/DfT published guidance (relating to TPs generally and also Residential	Recommend no change.

		the TP.	TPs). Section 106 agreements generally run with the land or buildings to which they relate, hence enforcement, where necessary, can be carried out against future occupiers.	
Paragraph 45	Oxonian Cycling Club / Graham P Smith	Layout is most likely to be more effective than any of these.	Importance of design layout is fully recognised by the Council, as reflected in Section 2.0 of the adopted OLP. However this is not directly relevant to enforcement of TP measures.	Recommend no change.
Paragraph 49	Oxonian Cycling Club / Graham P Smith	Should demand permeability within existing context rather than within a site.	The points highlighted are drawn from DfT best practice guidance on residential TPs. Good site permeability is considered significant in supporting sustainable travel choices (e.g. avoiding tortuous or 'dead end' pedestrian routes to bus corridors, shops etc.), and should therefore be included.	Recommend no objection.
Paragraph 49	Oxonian Cycling Club / Graham P Smith	Note that car-free means streets free of cars rather than people having no cars, e.g Vauban development, Freiberg, Germany.	'Car-free' in UK planning terms is generally used to describe residential development which prohibits occupiers from owning cars. This is set out in the main text (paragraph 64) but will be added to the Glossary for clarity.	Add definitions of 'car-free' 'car-parking free' and 'low car' in Glossary as per definition given in paragraphs 64, 68 and 72 of the SPD respectively.
Paragraph 49	Oxonian Cycling Club / Graham P Smith	Support demanding improvements to off-site infrastructure.	Support noted.	No change requested.
Paragraph 29	Cyclox +	The costs of administering car parking is also an area where TPs	Additional text included.	Insert in paragraph 29,

	Highfield Residents' Association	may save money.		bullet 3: "saving money on the physical maintenance <u>and administration</u> of car parking spaces."
<b>Section 3: TRAVEL PLANS (POLICY TR.2)</b>				
'Policy TR.2 Travel Plans'	Oxford Brookes University (West Waddy)	Reference should be made to the possibility that a travel plan may pre-date the development proposal. In the case of Oxford Brookes University, it would be unreasonable to expect a new TP to be produced with every planning application. The SPD should therefore refer to the possibility of linking a consent to an existing TP to achieve objectives set out in OLP Policy TR.2.	Paragraph 32 of the draft SPD states that "developers should seek to integrate with other relevant travel plans and transport strategies." This would include pre-existing TPs which apply to a site, set of sites or institution or business. However all relevant planning applications should include reference as to how a new development ties in with the targets and measures set out in a wider TP; the scope of what is submitted should in any case be agreed with the City and County Councils, as set out in the draft SPD.	Recommend no change.
'Policy TR.2 Travel Plans'	Business Parks Partnership (GB) Ltd (GVA Grimley)	Some indicative costs of running a Travel Plan would be helpful, e.g. an approximate figure for the good practice example included.	The costs involved in administering a TP will vary greatly depending on the scope and nature, and may well be cost neutral given the benefits which an effective TP can deliver. It would therefore not be helpful or appropriate to include figures as suggested, although further advice may be sought from the sources listed in Appendix 2 and relevant contacts in Appendix 7.	Recommend no change.

<p>Paragraphs 30 and 44</p>	<p>Business Parks Partnership (GB) Ltd (GVA Grimley)</p>	<p>A list of examples of contingency measures relating to TPs would be helpful, unless the list of sanctions under paragraph 44 includes contingency measures – in which case this should be clarified.</p>	<p>Contingency measures built into a TP will be specifically related to the actions and targets included in that TP. Therefore a list of examples is not considered appropriate, however clarification of the text will be included.</p>	<p>Amend final sentence in paragraph 40 to read: “The TP Coordinator should also liaise with the City Council and, potentially, the County Council, to discuss any problems in implementing TP measures or meeting targets, well before submitting monitoring results, so that they can agree an appropriate course of <u>contingency</u> action <u>(for example revise targets if justified, or implement additional or alternative measures)</u>.”</p>
<p>Paragraph 31</p>	<p>Oxford Brookes University</p>	<p>Welcome reference to the Oxford Brookes University Sustainable Travel Plan in box below</p>	<p>Support noted.</p>	<p>No change requested.</p>

	(West Waddy)	paragraph 31.		
Paragraph 49	British Waterways (South East)	Support the inclusion of improvements to off-site infrastructure within the the Residential TP measures. Suggest this should be included in all TPs.	Support noted. Change made to paragraph 15 of the draft SPD to include reference to potential off-site measures.	Addition to paragraph 15 2 <sup>nd</sup> sentence: “In such cases, the TA should provide for a package of measures ( <u>on or off-site, or both</u> )...”
<b>Section 4: RESIDENTIAL PARKING (POLICY TR.3)</b>				
Residential Parking	Linden Homes (Chiltern) Ltd (Agent: David Ames Associates)	In discussing general car parking requirements, there should be some recognition that in some cases affordable housing developments have a reduced car parking requirement, as reflected in many RSLs’ criteria.	Paragraph 60 of the draft SPD states that in assessing car parking requirements, the City Council will consider level of car ownership likely to arise. Reference is made in the paragraph to mix of dwelling type and tenure. Therefore objection has already been addressed.	Recommend no change.
Paragraphs 54 – 55	Oxonian Cycling Club / Graham P Smith	“Good cycling opportunities” refer more to street layout and motor vehicle connection than to any great effort by the Highway Authority.	Comment noted.	No change requested.
Paragraph 58	Oxonian Cycling Club / Graham P Smith	Statement not supported by Young and Jones study of car ownership; it is more related to dwelling size.	Objector’s point re dwelling sizes is acknowledged in paragraph 56. However location is also an important factor in individuals’ car ownership choices, as evidenced by low rate of car ownership in City centre wards.	Recommend no change.
Paragraph	Oxonian	“Non essential” is a contentious	The term ‘non-essential car parking provision’ is	Recommend no

59	Cycling Club / Graham P Smith	statement of description, rather than investigation. Depends for instance on where 'cordons' are chosen. What is non-essential – less than the 94.5% ratio derived from figures quoted in paragraph 54?	taken from the adopted OLP (paragraph 3.5.1). The term is not intended to be prescriptive, however it does reflect the Council's approach of not supporting overprovision of parking beyond what is necessary.	change.
Paragraph 61	Oxonian Cycling Club / Graham P Smith	What is mechanism for revising down car parking levels?	The paragraphs following this text set out in detail potential opportunities for revising down parking levels. A suggested process is set out in the flow diagram lower down the page.	Recommend no change.
Paragraph 62	Oxonian Cycling Club / Graham P Smith	Support having care for the impact of development with reduced provision on existing streets.	Support noted.	No change requested.
Paragraph 64	Oxonian Cycling Club / Graham P Smith	Find description of car-free development very questionable. Most continental examples have very good cycle and public transport links; car-free (but car-accessible) streets, and on site or nearby car parking for those who choose to have a car. Some UK schemes seem to have residents who have evaded controls on car ownership or are based on short lets. I understand abuse is known at the Edinburgh example quoted.	'Car-free' in UK planning terms is generally used to describe residential development which prohibits occupiers from owning cars (as explained in draft SPD). The criteria for accepting car-free proposals are clearly set out in paragraph 66, including proximity to frequent bus services and local shops and services, and realistically enforceable.	Recommend no change.
Paragraphs 64-67	Gosford and Water Eaton	Concern that rigorous parking standards applied to the City could	The draft SPD sets out clear criteria for car-free development; such proposals are required to	Recommend no change.



	Parish Council	cause adverse problems for surrounding villages, e.g. resident of car-free estates may rent garages or space, or park on-street, etc, in villages.	demonstrate genuine demand and realistic enforceability. It is unlikely that individuals choosing to live in a car-free home in Oxford will own and park cars outside Oxford.	
Paragraphs 64-71	Network Rail	Support stance on car-free schemes, provided it is explicitly recognised that the on-site space saving this results in can provide higher density development.	First bullet point under paragraph 64 highlights benefit of potentially more dwellings being accommodated on a given site. However other benefits, such as more amenity and social space, may be unduly detracted from if higher densities were singled out as a requirement for car-free development.	Recommend no change.
Paragraph 66 (footnote)	Dr K M Hall	Support particularly the mention of sub-post offices among “key local services”.	Support noted. Respondant may wish to note that definition of “key local services” is drawn from PPS6.	No change requested.
Paragraph 66	Oxonian Cycling Club / Graham P Smith	Bullet point 3 refers to high daytime bus frequency, but even in Oxford frequencies collapse shortly after 6pm, reducing opportunity for evening bus travel.	It would be unduly prohibitive to expect 15 minute evening bus service frequencies for all car-free development, given proximity to local services is a further criterion. Note also that most built-up areas in Oxford enjoy relatively good evening bus services in any case.	Recommend no change.
Paragraph 66	Oxonian Cycling Club / Graham P Smith	Bullet point 4 need to be supported by design layout examples of good quality or it is ‘hope’.	Point noted, however the importance of design layout – including for cyclists – is fully recognised in Section 2.0 of the adopted OLP, and need not be repeated at length in the SPD.	Recommend no change.
Paragraph 66	Oxonian Cycling Club / Graham P Smith	Where is requirement for adequate visitor parking?	It is expected that visitor parking, whilst not encouraged, will normally be available as public parking within the vicinity, or visitors to find alternative means of travel (e.g. Park and Ride). However text to be added to draft SPD to clarify the need to consider visitors’ needs.	Add further bullet point under paragraph 66: <u>“Visitors’ access needs, and the needs of disabled</u>

				<u>occupiers, should also be considered.”</u>
Paragraph 66, footnote	Highfield Residents' Association	Local services as defined in footnote should be included as part of the planning for large-scale residential developments. Developers might be tempted to leave one of these out to avoid making the development car-free.	Policy CP.5 in the adopted OLP promotes mixed-use development. It would not be appropriate to introduce a specific requirement for local shops etc. along the lines suggested; this would need to be addressed through DPD policy.	Recommend no change.
Paragraph 67	Oxonian Cycling Club / Graham P Smith	Is approach realistic, what levels of abuse are there? Venneit Close illustration misleading as it is a student development for the University, and the cycle path is closed at night.	There are no planning restrictions limiting occupation of the Venneit Close development to students; these were built as ordinary flats. Photo is intended to illustrate that car-free development has taken place in Oxford (as well as demonstrating the amenity space / landscape benefits that can be gained). The approach set out in the draft SPD reflects adopted OLP policy.	Recommend no change
Paragraph 67	Highfield Residents' Association	Powers to influence provision of parking on private land needs strengthening, e.g. through higher valuations for rates, working with housing associations as landlords.	The City Council does not have planning powers to control parking on land which has established use for car parking. This is therefore beyond the remit of the SPD.	Recommend no change.
Paragraph 68	Oxonian Cycling Club / Graham P Smith	Incremental car-free development is most annoying to neighbours.	The paragraphs that follow set out the Council's approach, which has regard to problems arising from high parking pressures and mitigating circumstances.	Recommend no change.
Paragraph 71	Oxonian Cycling Club / Graham P Smith	Re point 3 – is proposal well-related to the walking and cycling networks? – what are values? Issue of quality is essential.	The statement is not intended to be prescriptive, but to emphasise the need for this point to be considered.	Recommend no change.

Paragraph 74	Oxonian Cycling Club / Graham P Smith	Bedzed needs to be reported in use, by independent observers.	The example used has been recognised widely as good practice.	Recommend no change.
Paragraphs 75-78	Streetcar	Case study attached should Council wish to use it.	Case study gratefully noted, however benefits already outlined in draft SPD.	Recommend no change.
Paragraphs 75-79	Linden Homes (Chiltern) Ltd (Agent: David Ames Associates)	Although principle of car clubs is supported for larger sites, it should be recognised that in some circumstances there is a significant up-front cost for developers to set up a car club, which may have implications for scheme viability and Section 106 requirements.	Bespoke provision of a car club will normally only be appropriate on sites suitable for car-free or low-car development. In the Council's view, the financial saving made by the developer in not having to provide a large number of car parking spaces is likely to more than offset the upfront cost of contributing to a car club.  In all cases, Section 106 agreements have to comply with the tests set out in Circular 05/2005, and the Planning Obligations SPD being produced concurrently with this SPD.	Recommend no change.
Paragraph 77	Streetcar	Car club synopsis point 2, request change of wording to " <u>Car Club members pay a refundable deposit and an hourly or daily hire charge for each use. Some companies charge membership and/or subscription fees, Streetcar does not.</u> "	Wording suggested could be construed as promoting a particular brand. However factual correction should be included as pointed out.	Revise wording to read: "Car club members may pay a membership fee or subscription, <u>and/or refundable deposit</u> , and an hourly or daily hire charge for each use."
Paragraph 80	Oxonian Cycling Club /	Reference to EP's 'Car Parking: what works where' should be	The forms of parking referred to are recognised in the EP publication as potentially suitable for	

	Graham P Smith	checked for the 'traffic lights' assessment of different schemes. Woodin's Way basement parking looks to have a questionable relationship with public space.	central or urban locations. Wording of SPD states only that underground /basement parking "may" be appropriate, recognising that site context is paramount.	
Paragraphs 81, 83, 85, 91	Oxonian Cycling Club / Graham P Smith	Prioritisation of street environment, and guidance on unallocated parking, are supported. Observations of impact of front garden parking also supported.	Support noted.	No change requested.
Paragraphs 83-87	Ralph Adams, City Council Parking Shop	Off street parking spaces are for the use of residents. Non resident landlords cannot use the parking space apart from visits for maintenance to the property. Any lease of the property must include use of the parking space by the tenant and avoid separation of dwelling and parking as has happened on many occasions in the past.	View maintained that unallocated parking will, in many circumstances, represent the most efficient and effective use of land. In a CPZ, only permit-holding residents are permitted to park in the locality. Where significantly fewer off-plot allocated spaces are provided than dwellings, the SPD supports leasing these separately to occupying <u>residents</u> to reflect that not all residents will be car owners. Prevention of the use of private residential spaces by non-residents can be controlled by condition.	Recommend no change.
Paragraph 87	James Dawton, CTC	Add "...allow a wide enough carriageway for emergency and service vehicles, <u>cyclists</u> and where appropriate buses..."	Wording in the form suggested is unnecessary as cyclists require less passing space than emergency vehicles and buses. However agree that reference could be made to cyclists' design needs in a more general sense.	Insert new second sentence to paragraph: " <u>They should also cater for cyclists' needs and safety.</u> "
Paragraph 90	Oxonian Cycling Club / Graham P Smith	Note that pictured example of front garden parking has unusually long front gardens which enables integration. This is unusual.	The photograph example gives an idea of how on-plot parking to frontage can be mitigated with landscaping, and supplements the accompanying text. More widely applicable	Recommend no change.

			guidance is referred to in Appendix 5 – Guidance Note on Front Garden Parking.	
Paragraphs 90-94	Mrs Sarah King	Some indication should be given as to who judges absolute necessity regarding front garden parking. Suggest an example is included. Consider that the text is likely to result in the invoking of Absolute Necessity and unilateral action by property owners, regardless of the circumstances.	Agree that wording could be tightened with regard to ‘absolute necessity’. Minor wording change suggested. However quoting specific example is not supported here as a rationale is already set out in paragraphs 60-63 (‘Determining Appropriate Parking Provision’ and paragraphs 14-21 (under ‘Transport Assessments’ with regard to residential parking.  Objector should note that most household owners already have permitted development rights to create or cease use of on-plot parking without submitting a planning application.	Change 1 <sup>st</sup> sentence of paragraph 92 to read: “Where the City Council agrees that front garden parking is the most appropriate option,…”
Paragraph 95	Oxonian Cycling Club / Graham P Smith	Morice Town photo misleads, as street is only developed along one side, effectively doubling parking provision.	Much of the Morice Town Home Zone has development on both sides of street, as well as numerous flats. An aim of this home zone was to rationalise car parking, and this appears to have been relatively successful.	Recommend no change.
Paragraph 96	Oxonian Cycling Club / Graham P Smith	Parking minimisation has not been a key point of Home Zones. Adequate parking is a key point.	This point refers to the minimisation of the <i>impact</i> of parking, which for UK Home Zones has in many cases been a key objective.	Recommend no change.
Paragraph 96	Oxonian Cycling Club / Graham P Smith	Promotion of well-designed, high-density urban housing is not a Home Zone feature, though tends to be less need in low density development due to less street space stress.	Wording change suggested to more accurately reflect that Home Zone concept is not exclusively applicable to high density development.	Change last bullet under paragraph 96: “ <u>can assist in</u> well-designed, high density urban housing.”

Paragraph 97	Oxonian Cycling Club / Graham P Smith	Speeds in a Home Zone should be around 10mph not 20mph.	The reference to 20 mph extends to all new residential streets, not just homezones. Paragraph 96 states that Home Zones should be designed to reduce vehicle speeds to around 10 mph.	Recommend no change.
Paragraph 97	Oxonian Cycling Club / Graham P Smith	Bullet 1: note that all road users have an equal right.	Wording suggested to clarify this point.	Amend Paragraph 97 bullet 1: "highway design which encourages slow driving, and which ensures, as far as is safe and practicable, that all road users feel <u>they have equal priority to one another</u> "
Paragraph 97	Oxonian Cycling Club / Graham P Smith	Bullet 3: this has some demanding design implications for overlook and safety.	This point reflects the Council's view that at least some unallocated parking will generally be preferred, as a more efficient use of parking space.	Recommend no change.
Paragraph 97	Oxonian Cycling Club / Graham P Smith	Bullet 4: why not on-street cycle parking for residents?	As set out in paragraphs 125-128 of the draft SPD, residential cycle parking should always be secure and undercover (preferably enclosed). It is not appropriate to encourage on-street cycle parking as a substitute for residential cycle parking, as this would offer relatively poor security.	Recommend no change.
Paragraph 97	Cyclox +	Visitor cycle parking for residential development is mentioned only in	Addition to text of paragraph 125 as per response to previous objection.	Add sentence to paragraph 125:

	Highfield Residents' Association	the context of Home Zone design, whereas it should apply to any housing development with limited or no front space abutting the road.		<u>"Visitor cycle parking needs should be taken into account."</u>
Paragraph 104	Oxonian Cycling Club / Graham P Smith	With car-free developments there will be an increasing demand for parking of cycle trailers and child trailers. This has been omitted.	Addition to text in relevant section to be included.	Add to paragraph 126: <u>"Provision for cycle trailers for carrying goods or children should also be considered where appropriate."</u>
<b>Section 5: NON-RESIDENTIAL PARKING (POLICY TR.3)</b>				
Paragraph 106	Oxonian Cycling Club / Graham P Smith	The cycle network following OTS (1999) is mostly inconvenient, uncomfortable or unsafe.	This comment is not relevant to this SPD. The paragraph is only to give a brief background to OTS and its effects.	Recommend no change.
Paragraphs 106-122	Network Rail	Text should specifically state that station car parking falls within the category "operational parking", i.e. should not be subject to stringent standards often applied to commercial development. Adequate station parking is pivotal in supporting sustainable transport choices and good interchange opportunity.	Paragraph 3.8.14 of the adopted OLP makes clear the Council's position that, due to constrained capacity on the surrounding road network, further parking provision in association with the Station is not considered appropriate. It would not be appropriate to define public station car parking as 'operational', which refers to parking necessary to allow the basic operation of a business to function, such as essential servicing and delivery requirements (and specifically does not include commuter related parking).	Recommend no change.

Paragraph 109	Oxonian Cycling Club / Graham P Smith	Agree with implicit assessment of the quality of access to sites. Could this be made explicit?	Unclear what Objector is seeking. Text as it stands refers to TAs showing how sites can be accessed by modes other than private car. More detailed guidance on TAs is given earlier in the draft SPD and in Appendix 2.	Recommend no change.
Paragraphs 111-113	WH Morrison	SPD should make reference to the benefits of linked trips and shared parking for shoppers and visitors, regarding in-centre or edge-of-centre retail facilities. This should be reflected in more flexible parking standards for such facilities.	Paragraphs 112 and 113 of the draft SPD state that shared use parking on mixed-use sites will be supported. Text quoted from Appendix 3 of the OLP states parking for major retail developments may be acceptable if it serves the City centre as a whole.	Recommend no change.
<b>Section 6: CYCLE FACILITIES (POLICY TR.4)</b>				
'Policy TR.4 Pedestrian and Cycle Facilities'	Oxford Brookes University (West Waddy)	Support section on cycle facilities which reflects Oxford Brookes University current practice.	Support noted.	No change requested.
Paragraph 123	Oxonian Cycling Club / Graham P Smith	I thought cycling was 16% of peak traffic and that nationally the rate was below 2%.	The figure for Oxford (main mode of journey to work) is taken from the Oxfordshire LTP 2006-2011 (analysis of Census 2001 data). The Census 2001 gives a figure of 2.83% of employed people in England who travel to work by bicycle.	Recommend no change.
Paragraph 125	Oxonian Cycling Club / Graham P Smith	2 cycle parking spaces per dwelling seems inadequate, it might better be related to bedspaces.	LDF guidance on producing SPDs is clear that an SPD may only supplement or provide further detail on DPD or saved Local Plan policies, i.e. cannot replace or amend policies. The change suggested may therefore make the document	Recommend no change.



			unsound and cannot be supported.	
Paragraphs 125-128	Cyclox + Highfield Residents' Association	The standards for visitor cycle parking to residential developments are non-existent or inadequate.	There is no specific standard for residential visitor parking set out in the adopted OLP, and the SPD cannot amend these. Additional text suggested nevertheless suggested to encourage visitor provision for new residential development.	Add sentence to paragraph 125: <u>"Visitor cycle parking needs should be taken into account."</u>
Paragraph 127	Oxonian Cycling Club / Graham P Smith	Seems to suggest access to back of dwellings when on most Victorian streets the preference seems to be in curtilage at front.	Cycle stands located at front of converted older dwellings may in some cases be only practicable option, however this is not ideal and should not be allowed where there is opportunity to provide more secure storage.	Recommend no change.
Paragraph 128	Oxonian Cycling Club / Graham P Smith	Should also refer to physical measures such as lack of kerbs to be ridden up, i.e. flush kerbs.	Text already states that access to cycle storage areas must be convenient. Consider further detail is unnecessary.	Recommend no change.
Paragraph 130	Cyclox + Highfield Residents' Association	One cycle space per 5 staff is completely inadequate, as evidenced by buildings where there are currently high standards of cycle parking and showering facilities. Many other cities specify one space per 3 staff.	Paragraph 130 makes clear that 1 space per 5 staff is a minimum requirement, which is adopted OLP policy. Parking and cycle parking standards are adopted OLP policy which the SPD cannot change (as acknowledged by Objector).	Recommend no change.
Paragraph 134	Oxonian Cycling Club / Graham P Smith	Illustration shows a fallen bike, raising issue of ongoing maintenance. Roof cover should not be so close as to prevent locking bike frame and front wheel to rack.	Photograph to be amended (however note that bike fall could have only recently occurred). SPD should not go into minute detail to deal with every potential design flaw.	Amend photograph example which may suggest inadequacy due to fallen bicycle.
Paragraph	Oxonian	Note any decent cycle provision	Comments on planning applications currently	No change

137	Cycling Club / Graham P Smith	seems to have evaded Westgate designers.	under consideration are not relevant to this SPD.	requested.
<b>APPENDIX 1: POLICIES FROM THE OXFORD LOCAL PLAN 2001-2016</b>				
Appendix 1 (cycle parking standards extract from OLP)	James Dawton, CTC	Cycle parking standard for residential units should be amended to “2 spaces <u>or intended number of occupants, whichever is the bigger</u> per residential unit.”	LDF guidance on producing SPDs is clear that an SPD may only supplement or provide further detail on DPD or saved Local Plan policies, i.e. cannot replace or amend policies. The change suggested may therefore make the document unsound and cannot be supported.	Recommend no change.
Appendix 1 (car parking standards extract from OLP)	McCarthy and Stone (Agent: Planning Bureau Ltd)	Parking standards provision set out in the SPD for sheltered housing for the elderly is too high. Suggest 1 space per resident staff, + 1 space per 3 non-resident staff, + 1 space per 4 residents for visitors, + adequate delivery/ambulance space	LDF guidance on producing SPDs is clear that an SPD may only supplement or provide further detail on DPD or saved Local Plan policies, i.e. cannot replace or amend policies. The change suggested may therefore make the document unsound and cannot be supported.	Recommend no change.
Appendix 1 (car parking standards extract from OLP)	WM Morrison	Standard for car parking for new food retail should reflect PPG13 and PPS6; hence OLP standard for devt below 1,000 sqm is unduly onerous, particularly with regard to extensions to existing stores. Unduly low standard may have adverse impact on traffic management, and may reduce competitiveness with existing foodstores. Also regard should be had to practicalities of transporting bulky shopping loads.	LDF guidance on producing SPDs is clear that an SPD may only supplement or provide further detail on DPD or saved Local Plan policies, i.e. cannot replace or amend policies. The change suggested may therefore make the document unsound and cannot be supported.	Recommend no change.

Appendix 1 (PTW parking standards extract from OLP)	WH Morrison	Food supermarket customers are unlikely to use motorcycles for bulk food purchases. Car parking bays or appropriately designed cycle stands could accommodate motorcycle parking.	LDF guidance on producing SPDs is clear that an SPD may only supplement or provide further detail on DPD or saved Local Plan policies, i.e. cannot replace or amend policies. Any attempt to change OLP standards in the SPD suggested may therefore make the document unsound and cannot be supported.	Recommend no change.
Appendix 1 (Cycle parking standards extract from OLP)	WH Morrison	Minimum cycle standards are unnecessarily high, given likely limited demand. Alternative standards are suggested [see original representation].	LDF guidance on producing SPDs is clear that an SPD may only supplement or provide further detail on DPD or saved Local Plan policies, i.e. cannot replace or amend policies. The change suggested may therefore make the document unsound and cannot be supported.	Recommend no change.
Appendix 1 (of draft SPD)	Oxonian Cycling Club / Graham P Smith	How do standards arise, what are they based upon?	Parking and cycle parking standards are adopted OLP policy which the SPD cannot change, this comment is therefore not relevant.	Recommend no change.
OLP Appendix 3 & 4	Oxonian Cycling Club / Graham P Smith	Comments requesting changes to OLP standards.	Parking and cycle parking standards are adopted OLP policy which the SPD cannot change, this comment is therefore not relevant.	Recommend no change.
Appendix 1	Cyclox + Highfield Residents' Association	Although standards in the OLP (draft SPD Appendix 1) cannot now be formally altered until many years hence (2016), some of the specific parking provisions clearly act against the spirit of the SPD.	Objector should note that preparation of Transport and Accessibility DPD is scheduled to commence September 2007 (estimated date of adoption September 2010), which will have scope to revise parking standards.	No change requested.
Appendix 1	Cyclox + Highfield Residents'	Comments on adopted OLP car and cycle parking standards. Where possible SPD should amend these illogical standards.	Parking and cycle parking standards are adopted OLP policy which the SPD cannot change (as acknowledged by Objector).	Recommend no change.

	Association			
<b>APPENDIX 2: CHECKLISTS FOR PREPARING A TA</b>				
Appendix 2 (of draft SPD)	Oxonian Cycling Club / Graham P Smith	Comments relating to wording of Full TA scoping guidelines.	These guidelines have been recently drawn up by Oxfordshire County Council, who as the local highway authority are well placed to assess TAs. Changes are therefore not appropriate.	Recommend no change.
<b>APPENDIX 6: CAR AND CYCLE PARKING STANDARD DIMENSIONS AND INFRASTRUCTURE</b>				
Appendix 6	Cyclox	Should specify provision of variants to Sheffields for a proportion of these stands. Include space-saving units such as Cyclepods (revised design) and some of the Trystan designs.	Appendix 6 states that the preferred facility for parking cycles is the Sheffield stand, as these tend to offer the best security (other than enclosed cycle storage which is referred to elsewhere). It would not be appropriate for the SPD to consider numerous alternatives; potentially suitable alternatives to the Sheffield can be considered on their merits where proposed.	Recommend no change.

**Total comments: 112**