

Consultation Responses
Draft Parking Standards for Residential Development SPD 2015

ID	Full Name	Organisation	Do you consider the proposed Minimum Parking Standards for Residential Development (Table 1, Page 4) appropriate in meeting the future demand for parking in Epsom & Ewell? If you disagree with the proposed standards please set out the evidence to support your view.	Do you have any other comments that you wish to make in relation to the Parking Standards for Residential Development? If so, please clearly state which paragraph(s) you are commenting upon.	Officer Response & Suggested Actions
1	Ms Julie Morris		What is proposed is still not sufficient to provide what is desired by occupants and what is realistically needed.	Whatever the outcome, minimum parking standards should apply to multiple occupancy development and also to student accommodation.	<p><i>Response:</i> The proposed standards represent the minimum necessary to meet the requirements of local and national planning policies. These standards have been carefully considered against all of the available evidence to take account of local circumstances. As these are minimum standards the Council may seek to ensure higher levels of provision where justified with appropriate evidence.</p> <p>Parking provision for Houses in Multiple Occupation (HMOs) that fall under Use Class C4 and for student accommodation will continue to be assessed on a case-by-</p>

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					<p>case basis. Site specific factors will determine the appropriate level of parking provision for these types of use.</p> <p><i>Suggested Actions:</i> None</p>
2	Mrs Lindsey Steedman			<p>The minimum parking standards proposed should apply to multiple occupancy properties and to student accommodation otherwise areas that are already congested simply become worse if these properties are built without sufficient parking space.</p>	<p><i>Response:</i> Parking provision for Houses in Multiple Occupation (HMOs) that fall under Use Class C4 and for student accommodation will continue to be assessed on a case-by-case basis. Site specific factors will determine the appropriate level of parking provision for these types of use.</p> <p><i>Suggested Actions:</i> None</p>
3	Mr Mike Barnett		<p>The proposal goes some way forward, but is still insufficient to account for the needs of residents in the modern age. For example: a 2 bedroom flat should reasonably provide for 2 car-owning professionals, therefore 2 parking</p>	<p>Certain types of accommodation are not mentioned, e.g. Student housing. The Minimum Parking Standards should apply to ALL residential development.</p>	<p><i>Response:</i> National planning policy states that parking standards should take into account both development types and local car ownership levels. The evidence indicates that levels</p>

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			spaces are required. Similar consideration should be given across the range of dwellings mentioned.		<p>of car ownership generally correspond with household size and number of habitable rooms and bedrooms. Our minimum standards reflect this evidence and consequently lower levels of provision in flatted developments are considered appropriate.</p> <p>Parking provision for Houses in Multiple Occupation (HMOs) that fall under Use Class C4 and for student accommodation will continue to be assessed on a case-by-case basis. Site specific factors will determine the appropriate level of parking provision for these types of use.</p> <p><i>Suggested Actions:</i> None</p>
4	Mr John Willson		I support the formula you have proposed in respect of the type of dwelling and the number of parking spaces relevant to the type of dwelling. However you seem to have missed out two categories of	No - the above covers the points I wanted to address. Otherwise I support the proposals in full, but would like the addition of the above two categories of dwelling.	<p><i>Response:</i> Support welcomed. Parking provision for Houses in Multiple Occupation (HMOs) that fall under Use Class C4 and for student</p>

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			dwelling that would if they were not to be included could have a severe impact on parking and hence traffic flow in the borough. Also by missing out these two categories, you will be allowing a developer to wriggle through the residence to parking space formula you have proposed. The two categories are: 1) Student accommodation / hostels, where it is possible that each student room within a dwelling could equate to one car. So for example a small student building of twelve rooms could equate to 12 cars, whereas the same size of building for a family could equate to three cars on your proposed formula. 2) Multiple occupancy buildings.		accommodation will continue to be assessed on a case-by-case basis. Site specific factors will determine the appropriate level of parking provision for these types of use. <i>Suggested Actions:</i> None
5	Amanda Purdye	Gatwick Airport Limited		The draft parking standards do not appear to have any implications for Aerodrome Safeguarding and therefore we have no further comments to make.	<i>Response:</i> N/A <i>Suggested Actions:</i> None
6	Miss Pamela Bickerton Smith			Stress levels here very high re lack of parking for existing residents. Due to local hospital workers, 9 to 5 and shift workers to late in the evening. Hospital outpatients and visitors too. We can rarely park in	<i>Response:</i> The proposed standards represent the minimum necessary to meet the requirements of local and national planning policies.

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				<p>our own street now. Existing residents often have to sneak into the student's parking opposite but this won't be tolerated for long by the college. Or, park a long way away and walk home, with small children, shopping etc. So difficult. So many of us with no off road parking are desperate for Resident's Parking, and quickly!</p>	<p>These standards have been carefully considered against all of the available evidence to take account of local circumstances. As these are minimum standards the Council may seek to ensure higher levels of provision where justified with appropriate evidence.</p> <p><i>Suggested Actions:</i> None</p>
7	Mrs Adele Rayment		<p>There is an enormous lack of parking facilities in the area, office workers are using residential roads to park causing terrible 'bottlenecks' and damage to cars.</p>	<p>If any new residential properties are built they must have at least 1 space per flat or 2 spaces per house. If the proposed student flats on Mill Road are built they will need 1 space per flat to accommodate the increase volume of traffic parking in the area.</p>	<p><i>Response:</i> The proposed standards represent the minimum necessary to meet the requirements of local and national planning policies. These standards have been carefully considered against all of the available evidence to take account of local circumstances. As these are minimum standards the Council may seek to ensure higher levels of provision where justified with appropriate evidence.</p> <p>Parking provision for Houses</p>

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					<p>in Multiple Occupation (HMOs) that fall under Use Class C4 and for student accommodation will continue to be assessed on a case-by-case basis. Site specific factors will determine the appropriate level of parking provision for these types of use.</p> <p><i>Suggested Actions:</i> None</p>
8	Mr Chris Chappell		<p>I agree with previous comments that the proposal is still insufficient to account for the needs of residents in the modern age. Most residential property, including flats should have provision to park 2 cars. We can see many examples of flat dwellers cars having to park on the nearby roads because there is insufficient parking available to them where they live.</p>	<p>Again, I agree with previous observations where certain types of accommodation are not mentioned. Student housing and multiple occupancy flats should be added to sew up any loop holes. The Minimum Parking Standards should apply to ALL residential development.</p>	<p><i>Response:</i> National planning policy states that parking standards should take into account both development types and local car ownership levels. The evidence indicates that levels of car ownership generally correspond with household size and number of habitable rooms and bedrooms. Our minimum standards reflect this evidence and consequently lower levels of provision in flatted developments are considered appropriate.</p>

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					<p>Parking provision for Houses in Multiple Occupation (HMOs) that fall under Use Class C4 and for student accommodation will continue to be assessed on a case-by-case basis. Site specific factors will determine the appropriate level of parking provision for these types of use.</p> <p><i>Suggested Actions:</i> None</p>
9	Adrian Clark		<p>It's probably sufficient for outer areas of the borough, but 0.75 spaces per person in a town centre flat will not be sufficient, e.g. for two professionals sharing.</p>	<p>While the standards seem broadly sufficient, the table only refers to "traditional" permanent residential properties. The guidelines should be extended to cover such developments as student residences, and the figures should apply on a room-by-room basis. Student halls have a huge effect on congestion and over-subscription of surrounding residential parking.</p>	<p><i>Response:</i> National planning policy states that local parking standards should take into account the accessibility of development as well as the availability of and opportunities for public transport, together with local car ownership levels. The evidence indicates that all of these factors should result in a lower minimum standard in Epsom Town Centre.</p> <p>Parking provision for Houses in Multiple Occupation</p>

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					<p>(HMOs) that fall under Use Class C4 and for student accommodation will continue to be assessed on a case-by-case basis. Site specific factors will determine the appropriate level of parking provision for these types of use.</p> <p><i>Suggested Actions:</i> None</p>
10	Iain McNeil		<p>The allocated parking is far too low for modern standards. In 2013 there were 35 million cars in the UK. This is a rise of 1.5 % on the previous year. There are around 63 million people in the UK. This gives a ratio of 0.55 cars per person. If a development is designed to house 100 people it should have a minimum of 55 parking spaces. See (https://en.wikipedia.org/wiki/Demography_of_the_United_Kingdom) and (https://www.gov.uk/government/statistics/vehicle-licensing-statistics-2013) This is just the average and some areas will have a much higher % of drivers than others. We</p>		<p><i>Response:</i> The proposed standards represent the minimum necessary to meet the requirements of local and national planning policies. These standards have been carefully considered against all of the available evidence to take account of local circumstances. As these are minimum standards the Council may seek to ensure higher levels of provision where justified with appropriate evidence.</p> <p>Parking provision for Houses in Multiple Occupation</p>

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			<p>also need to future proof to make sure the parking is adequate for the next 20 years or more and take account of the growth rate of 1.5% per year. The concerning thing is the growth rate itself is increasing. In 2012 it was only 1.2% so growth is accelerating and we should expect significantly more cars than ever in the coming years. The current proposals don't come close to providing enough parking, especially for areas of student accommodation and do not take in to account modern living practices and plan for future growth.</p>		<p>(HMOs) that fall under Use Class C4 and for student accommodation will continue to be assessed on a case-by-case basis. Site specific factors will determine the appropriate level of parking provision for these types of use.</p> <p><i>Suggested Actions:</i> None</p>
11	Mrs Katie Bedford		<p>The table is appropriate to meet the needs of flats and houses, but you have missed out student accommodation. This needs to be included as the density of individual households potentially each owning a car would be very high.</p>	<p>Paragraph - minimum standards for residential developments This needs to include student accommodation as each room would effectively be a separate household with the potential to own a car. If not included, the knock on effect on Epsom streets could be very difficult. Each student room should have 1 car parking space allocated.</p>	<p><i>Response:</i> Parking provision for Houses in Multiple Occupation (HMOs) that fall under Use Class C4 and for student accommodation will continue to be assessed on a case-by-case basis. Site specific factors will determine the appropriate level of parking provision for these types of use.</p> <p><i>Suggested Actions:</i> None</p>

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12	Mrs Maureen Willson		<p>No, I believe the allocated parking for all types of development within the Minimum Parking Standards for Residential Development is set too low. Just two examples: i) one four-bedroom house will often have two adults and two children who, when they reach the age at which they can drive, each own a car. Four parking spaces are often needed. ii) two-bedroom flats should have parking for two cars. Most professional couples have their own cars as couples these days lead, at least in part, independent social lives requiring separate cars. Patterns of living have changed dramatically in recent years. Your list of dwellings does not include student accommodation. Would you amend this, please? Again, patterns of behaviour and car ownership have changed dramatically among young people. Each student room should have an allocation of one parking space. Students, on the whole, will own cars and will park them on the roads.</p>	<p>Just a couple of general comments. Your background evidence does not seem to have been adequately taken into account when deciding the Minimum Standards. You also need to take into account the lack of parking facilities we already have to cope with. School staff and school visitors park on our roads as schools have inadequate parking facilities. Increasing provision of wrap-around-care before and after standard school hours increase this pressure on parking spaces on the streets. Commuters clog our roads. It is of vital importance that new developments are given more than the absolute minimum on-site car parking facilities.</p>	<p><i>Response:</i> The proposed standards represent the minimum necessary to meet the requirements of local and national planning policies. These standards have been carefully considered against all of the available evidence to take account of local circumstances. As these are minimum standards the Council may seek to ensure higher levels of provision where justified with appropriate evidence.</p> <p><i>Suggested Actions:</i> None</p>
13	Mr. Nigel Hawkes		<p>The standards are fine for the larger properties but inadequate for</p>	<p>What is proposed may, unwittingly, over time contribute to a further</p>	<p><i>Response:</i> National planning policy</p>

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			<p>the smaller ones. The minimum, in my view, should be two spaces per dwelling and, in the case of flats, an extra space per, say, 4 or 5 dwellings. This is only what we had back in the '60s where many fine developments such as Briavels Court and Sandown Lodge were constructed and still contribute positively to the town's appearance; unlike much more unsympathetic recent developments. Evidence-well, it's all around us in the cluttering of the streets and the increase in the stress and "edginess" of the population.</p>	<p>class polarisation of areas of the town, i.e., spacious, larger properties contrasted with "ghetto-like", cramped areas. One has only to compare, say, Reigate and Esher, or-nearer to home-Ashted, with Epsom to see how the town has deteriorated since the 1960s.</p>	<p>states that parking standards should take into account both development types and local car ownership levels. The evidence indicates that levels of car ownership generally correspond with household size and number of habitable rooms and bedrooms. Our minimum standards reflect this evidence and consequently lower levels of provision in flatted developments are considered appropriate.</p> <p><i>Suggested Actions:</i> None</p>
14	Mr Malcolm Boyd	Epsom Civic Society	<p>We welcome the Provision of Minimum Standards for Parking in Residential Areas of Epsom. After deliberation we agree that the provisions within Table 1 are appropriate. We have one comment that we feel that will assist its implementation considerably.</p>	<p>Paragraph 4.3 is an important qualification of the Standards and we suggest that there should be a footnote to Table 1 linking the Standards to Paragraph 4.3. We also suggest that in Paragraph 4.4 the word 'up' should be inserted between 'rounded' and 'to' in order to avoid ambiguity. In Paragraph 4.6, we are concerned that modern car width being around 2m the minimum width of 2.7m may be insufficient.</p>	<p><i>Response:</i> Support welcomed. The SPD should be read as a whole together with and alongside the Council's Local Plan policies, and therefore Paragraph 4.3 should be read alongside Table 1. Officers consider that there is no need to add an additional footnote linking these.</p> <p><i>Suggested Actions:</i></p>

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					<p>Consider clarifying Paragraph 4.4 to avoid ambiguity.</p> <p>Consider increasing minimum garage width to 3m.</p>
15	Mr Ian Booker		<p>It would help if you included garage sizes from recent developments which would demonstrate that sizes provided at the discretion of Developers have led to garages people cannot park their cars in. Just go to Parkview Estate built by Linden Homes to see the result. Then the dimensions of 2.7m x 5.1m can be seen in context. (i.e. is it larger or small than recently built garages which have proved too small). I would also add a table of car dimensions that would see how they would fit into a garage. Garage door openings need to be stipulated as I have seen many garages where the car cannot get through the door opening. On the recent West Park development as part of my research I inspected a £900k house where my small sports car would not fit through the garage door! Again take for example the BMW X3 which is 2.09m x 4.66m overall (including</p>		<p><i>Response:</i> The Surrey Vehicular & Cycle Parking Guidance contained no minimum garage size requirements and consequently the sizes of garages provided in recent developments have not been monitored. This makes data difficult to obtain on the sizes of garages in recent developments. Minimum garage sizes have been determined from comparator standards in adjoining authorities; however, Officers are aware that some recently built garages have proved too small to store cars. Introducing minimum garage sizes will help to resolve this problem.</p> <p><i>Suggested Actions:</i> Consider increasing minimum garage sizes to 3m x 5.5m in</p>

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			<p>wing mirrors). Drivers will not park closer than 200mm to a wall so if the driver parked close to one side (which will be very difficult if not impossible as the garage door width will not be as wide as the garage) that will only leave 410mm in which to open the door and get out. The wing mirror of course may prevent the door opening this far. In summary I suggest a garage of 3.0m x 6.1m should be the preferred minimum size with a full width door.</p>		<p>order to take into account larger cars and prevent unsuitable garages from being provided.</p>
16	Mr Colin Wing	LA21 / Environment Forum Transport Group	<p>No. The evidence base fails to take into account the proximity of public transport and other amenities in the different parts of the borough. If these are taken into account, there is a case not only for a minimum quota of zero in Epsom Town Centre but also for applying the Town Centre minima to centres of Ewell and Stoneleigh. Without a minimum provision of zero spaces, it will not be possible to convert accommodation over many shops to residential use. Epsom and Ewell already suffer badly from traffic congestion. Parking (and using) more cars will only make the situation worse.</p>		<p><i>Response:</i> The proposed standards represent the minimum necessary to meet the requirements of local and national planning policies. These standards have been carefully considered against all of the available evidence to take account of local circumstances.</p> <p>Where there is clear justification, it may be possible to provide lower levels of provision than the minimum standards; however, this is best assessed on a</p>

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					<p>case-by-case basis where it can be robustly demonstrated that there will be no harmful impact on the surrounding area in terms of street scene or the availability of on-street parking.</p> <p>The evidence suggests that car ownership levels will continue to increase and the Council believes that in most cases, reduced or nil parking provision does not effectively discourage the use of cars; rather it can exacerbate on-street parking conflict. Setting minimum standards will help to ease on-street parking stress.</p> <p><i>Suggested Actions:</i> None</p>
17	Mr Bob Eberhard	Epsom & Ewell Cycling Action Group	Our concern is that the proposed increase in car parking spaces in new Town Centre developments will prove an increased deterrent to cycling to the Town Centre, and contrary to policy aims to "encourage greater use of public transport, cycling and walking"		<p><i>Response:</i> The Council continues to encourage sustainable transport and its Local Plan policies reflect this approach. Adequate provision of cycle spaces will still be required for new developments.</p>

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					<p>Where there is clear justification, it may be possible to provide lower levels of provision than the minimum standards; however, this is best assessed on a case-by-case basis where it can be robustly demonstrated that there will be no harmful impact on the surrounding area in terms of street scene or the availability of on-street parking.</p> <p>The Council believes that in most cases, reduced or nil parking provision does not effectively discourage the use of cars; rather it can exacerbate on-street parking conflict. Setting minimum standards will help to ease on-street parking stress.</p> <p><i>Suggested Actions:</i> None</p>
18	Tella Wormington		I disagree with the minimum for 2 bedroom flats in Town Centre, as these will likely either be 2 or more adults sharing or families, neither	Table 1, Page 4. In my view 2 bedroom flats in Town Centre should have 1 space not 0.75, as these will likely either be 2 or more	<p><i>Response:</i> The proposed standards represent the minimum necessary to meet the</p>

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			<p>of which are realistically going to require less than one vehicle.</p>	<p>adults sharing or families, neither of which are realistically going to require less than one vehicle. There is a difference between car ownership and car use. Adults living in the town centre may use their cars less, but will still own cars as they require them for certain journeys /uses. It is unrealistic to assume otherwise.</p>	<p>requirements of local and national planning policies. These standards have been carefully considered against all of the available evidence to take account of local circumstances. As these are minimum standards the Council may seek to ensure higher levels of provision where justified with appropriate evidence.</p> <p>National planning policy states that parking standards should take into account both development types and local car ownership levels. The evidence indicates that levels of car ownership generally correspond with household size and number of habitable rooms and bedrooms. Our minimum standards reflect this evidence and consequently lower levels of provision in flatted developments are considered appropriate.</p> <p>National planning policy states that local parking</p>
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					<p>standards should take into account the accessibility of development as well as the availability of and opportunities for public transport, together with local car ownership levels. The evidence indicates that all of these factors should result in a lower minimum standard in Epsom Town Centre.</p> <p><i>Suggested Actions:</i> None</p>
19	Mr Cyril Frazer	Epsom Club	<p>Have read the policy proposals and believe it is the right level of parking for Houses in order to endeavour to restrict the level of on street parking that is now becoming a real problem for residential roads, especially when you have vans parked outside you house that completely blocks a safe exit by car from ones property.</p>	<p>I don't know what current policies now exist regarding permitted development. When these Parking Policies are introduced, will there be any way that spaces provided for parking alongside a house are not eventually utilized for a Permitted Development that could then reduce the parking spaces provided. This has occurred in the past at many semi-detached and single houses. Don't know what the policies are for retirement homes parking, was at one time only provided on the basis of One Space Per Unit of accommodation. If that is still the case this is</p>	<p><i>Response:</i> Support welcomed. The Council's ability to restrict Permitted Development Rights is limited, but it may be possible to consider this course of action on a case-by-case basis via planning condition where justified.</p> <p>Care homes falling under the C2 Use Class will be assessed on an individual basis as site specific factors will determine the appropriate level of parking provision for these uses. Retirement flats</p>

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				probably too low now as I know several people moving into such accommodation and still have cars. This will be a particular case in the development of the former Organ Inn site by McCarthy and Stone. In my road, Elmwood Drive if inadequate parking is provided it will exacerbate the problem when we already have the Honda Garage employees parking during the day.	falling under the C3 Use Class will be assessed in line with the proposed minimum standards. <i>Suggested Actions:</i> None
20	Mr Charles Muriithi	Environment Agency	Thank you for consulting the Environment Agency on the above. Where car parks are built in new residential developments, we recommend use of Sustainable Drainage Systems (SUDs) to reduce the risk of surface water flooding, ground water and land contamination. We would support proposals to minimise the area of impermeable paving and maximise soft landscaping. We would welcome the Council to seek to restrict permitted development rights for forecourt parking where surface water flooding issues exist. New residential development should incorporate flood protection measures where appropriate and		<i>Response:</i> The Council's ability to restrict Permitted Development Rights is limited, but it may be possible to consider this course of action on a case-by-case basis via planning condition where justified. <i>Suggested Actions:</i> None. It is considered that references to flood protection measures, permeable materials, soft landscaping and SuDS are best contained in the revisions to the Sustainable Design SPD, which considers all forms of development and is currently

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			support the requirement for the base and finished surface to be laid at a slight gradient and be of a permeable material, to allow the satisfactory drainage and absorption of rainwater. It will be essential that SUDS are properly planned at the onset of planning for new development. Developers and their design teams need to take into account different factors including the layout of the site, topography and geology when planning and positioning the different SUDS elements. This information will be required for both outline and full applications so it is clearly demonstrated that the SUDS can be accommodated within the developments that are proposed.		being consulted upon.
21	Mrs Katharine Harrison	Surrey County Council	Thank you for consulting Surrey County Council on the Epsom and Ewell Draft Parking Standards consultation. I can confirm that we consider these standards to be reasonable in the light of the surveys and background study that Borough Council have undertaken and have no further comments to make.		<p><i>Response:</i> Support welcomed.</p> <p><i>Suggested Actions:</i> None.</p>