

Parking Standards SPD Consultation Statement

Respondent	Comment ID	Relevant Part of SPD	Summarised Comments	MKCC Response
The Coal Authority	1	All	Milton Keynes Council lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on any stages of your Local Plan. It will not be necessary for the Council to provide the Coal Authority with any future drafts or updates.	Noted.
Natural England	2	All	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.	Noted.
Canal and River Trust	3	All	No comments.	Noted.

<p>Valerie Williamson BEM, Chair of Disability Advisory Group</p>	<p>4</p>	<p>All</p>	<p>I am disappointed that MKCC did not consult DAG during the process of collating the draft.</p> <p>Many people with disabilities need designated parking areas as close as possible to the entrance of their destination. I note the plan states the number of parking spaces available across the city will be reduced. I trust this will not include the disabled spaces as the users do not have any other form of transport. (Has an Equalities Impact Assessment been undertaken?) If not, why not?</p> <p>There are large areas of Milton Keynes without any public transport. MK Connect is not reliable for anyone wherever they live or their circumstance. E Scooters are not feasible for everyone.</p>	<p>In line with our Statement of Community Involvement (2019), MKCC has worked to ensure all relevant parties have been involved in preparing the SPD. To this end, DAG was consulted on the draft SPD so that its views would shape the final version of the document. We have carried out an EqIA as part of preparing the SPD. The EqIA is included in the supporting documents for the Delegated Decision. It found that the SPD has no adverse impacts for people with protected characteristics. In addition, the SPD does not propose reductions to Blue Badge Provision. It also increases cycle parking for disabled people with reference to the LTN 1/20 standard of 5% provision for non-standard cycles. Parking space arrangements have been updated in line with DfT Inclusive Mobility guidance (2022). Paragraph 7.13 of the SPD also states that EV provision in non-residential developments will need to accommodate disabled users.</p>
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Ernie Boddington, Chair of MK Centre for Integrated Living	5	All	<p>The various standards are confusing/misleading. Surely the Building Regulations take precedence over planning policy as they reference British Standards. Concern expressed regarding the lack of a dialogue with the Disabled Community in the development stage. Uncertainty regarding why a variety of Standards is quoted when there are very clearly primary ones that should be applied, in several cases superior to those stated. Question raised about why MKCC doesn't follow the design process as laid out by RIBA and in BS 8300. Has an Equality Impact Assessment been carried out in support of this SPD? If not, why not? We expect MKCIL and associated groups/organisations will be consulted in preparation of the EqIA.</p>	<p>In line with our Statement of Community Involvement (2019), MKCC has worked to ensure all relevant parties have been involved in preparing the SPD. To this end, MKCIL was consulted on the draft SPD so that its views would shape the final version of the document. We have carried out an EqIA as part of preparing the SPD. The EqIA is included in the supporting documents for the Delegated Decision. It found that the SPD has no adverse impacts for people with protected characteristics. Disabled parking provision has been a focus for this SPD update. BS 8300 is referenced in the DfT Inclusive Mobility Guidance which has informed the update. Therefore, the standards included in the SPD are in line with BS 8300. However, we will signpost BS 8300 as it does include additional detail on parking design.</p>
Ernie Boddington, Chair of MK Centre for Integrated Living	6	All	<p>Does the inclusion of powered two wheelers cover e-scooters and bikes? In developing the document consideration has been had to the standards adopted by other local authorities with similar characteristics to Milton Keynes was given – where are they? Might be handy for future applications.</p>	<p>Powered two wheelers does not include E Scooters and E Bikes. We have amended Paragraph 2.14 to make this clear. During the scoping of the review, and the review of cycling parking standards, blue badge, and EV provision there was benchmarking undertaken to other local authorities. The findings of this exercise are available in the evidence papers presented alongside this report.</p>

Ernie Boddington, Chair of MK Centre for Integrated Living	7	All	<p>If the aim of this standard is to reduce the level of car journeys and increase the use of public transport, then it is essential that a far greater provision and range of Public Transport must be provided. Consideration must be given to those who are dependent on private transport e.g., those that are disabled. It appears the proposed standards do not demonstrate adequate consideration in this respect; public transportation from some areas is often inadequate to meet the needs of local people. Is the intent of reduced parking standards to reduce the popularity of MK as a retail & business destination? The proportionate number of suitable parking spaces should be increased above the national standard and the status quo re. numbers should be maintained/increased to accommodate increased Blue Badge provision. EV standards should consider projected future trends on the expected number of EVs, rather than current levels, to avoid shortfalls. What is the lifetime of the proposed standards?</p>	<p>Provision of suitable levels of public transport and other services are outside the scope of this review. Existing provision and hence accessibility has been a consideration in the parking zone designations. Plan:MK policies, the Mobility Strategy and the Transport Infrastructure Delivery Plan address public transportation in greater depth. Blue badge standards included within the SPD is considered to sufficiently take account of the access by car needs of the disabled population. EV provision includes requiring passive provision that offers flexibility so that active provision can be more readily provided when there is greater demand/need in future. The standards don't have a set shelf life and will be updated when there is new evidence available to inform periodic reviews.</p>
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Ernie Boddington, Chair of MK Centre for Integrated Living	8	Part 2	<p>The consultation process seemed to be designed to make commenting on the SPD as difficult as possible. Recent court decisions have found similar Government consultations non-compliant. Why not use Approved Document S as the provision for new dwellings? As the only vehicles available in a decade be electric shouldn't the proportion of EV spaces be higher? What restrictions will be in place to stop non-EV drivers using EV bays? Shouldn't the provision of EV spaces and Table 2 include commentary on accessible bays - these are reference in PAS 1899 which will be launched soon. Does clause 2.5 relate to all electric vehicles? Is there conflict between 2.4 and 2.7? Parking for People with Disabilities states nothing about provision of accessible facilities. Shouldn't Building Regulations take primacy over Inclusive Mobility? IM has less onerous requirements regarding historic locations that should have been constructed to the then current BS requirements. What requirements will car clubs have with regards accessible facilities/bays?</p>	<p>The consultation process for this SPD has been carried out in line with our Statement of Community Involvement, which accords with all relevant national planning policy and legislation. As part of the SPD evidence base, we commissioned a technical report from Arup on Zero Emission Vehicle Operations. This considered EV adoption rates and charging requirements. It found that most people will charge at home and won't need to charge every day given typical trip lengths and battery ranges. Not all parking provision therefore requires charge point access. The SPD provision seeks to strike the right balance and avoid surplus provision that will just add unnecessary costs to developments. Parking controls are outside the scope of the SPD. A traffic Regulation Order can control EV space usage on public highway and council parking spaces. Control on private land will be a matter for the landowner. There is existing commentary on accessible EV bays in Chapter 2 and Appendix A of the SPD however we will signpost PAS 1899 so that readers are aware of the guidance there. The document does not include standards for car club bays, as need would depend on the car club operator requirements.</p>
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	9		<p>Clause 2.12 is vague - anybody can have a mobility scooter so does that make all newly constructed dwellings an appropriate development? Need to define Powered Two Wheelers. Sports pitches require 2 accessible bays per pitch, but this standard applies regardless of the spectator capacity.</p>	<p>BS 8300 provides additional guidance and suggests suitable provision for storing and charging electric mobility scooters only in relation to when Mobility Services are provided (for example, customer services to rent out mobility scooters). We will add a reference to BS8300 in Paragraph 2.13. Powered Two Wheelers are defined at Paragraph 2.14. For sports pitches, we will expect a minimum of 2 accessible bays per pitch. Where the number of spaces per pitch exceeds 20 spaces due to spectator seating, we will expect 6% of the additional spaces to be accessible bays in line with Paragraph 2.11 of the SPD. We will amend the guidance accordingly.</p>
	10		<p>Clause 2.25 HMOs only require 1 EV bay, this doesn't future proof the development. How far into the future are these standards meant to apply - the document doesn't reference this? Shouldn't all rooms in HMOs be serviced by disabled bays to enable disabled friends to visit?</p>	<p>None of the residential standards require disabled bays, except when car free HMO or Build to Rent developments include disabled access rooms, where 1 space per disabled access room is required. It is considered it would be inappropriate to require all HMO spaces to be enlarged.</p>

Ernie Boddington, Chair of MK Centre for Integrated Living	11	Part 3	<p>Good to see that provision for adapted cycles has been included, however shouldn't the design also be compliant and address the comments of BS 8300, which surely must have primacy with respect to the setting of standards.</p> <p>Clause 3.6 - Shouldn't this qualify is for manual scooters, although for secondary schools and future education locations provision for e-scooters should be provided in conjunction with provision of suitable charging facilities.</p> <p>Table 3 - We presume the 5% provision for adapted cycles applies across the board with entries in this table.</p> <p>Shouldn't provision of charging facilities also be incorporated into all these?</p>	<p>We will reference BS8300 as a source for additional detail and guidance. For clarity, 3.6 refers to manual scooters. E-scooters are distinct from this: currently private E-scooters are not legal for use on public land/highway, and to use rental scooters users must have a provisional licence - users would be at least 17 years old.</p> <p>We will clarify that the 5% provision for adapted cycles applies across the board. We have added Paragraph 6.6 to advise that consideration should be given for E-bike charging in communal bike storage areas in residential and non-residential developments.</p>
Ernie Boddington, Chair of MK Centre for Integrated Living	12	Part 4	<p>On-street parking. Whatever title it goes under, should in all instances comply with the design requirements provided within BS 8300 for a disabled bay as any could be used by a disabled person. What arrangements are being included for EV charging where on-street parking is being installed? Again, the EV facilities need to be disabled accessible, (compliant with PAS 1899). Locations of all these on-street parking facilities should be clearly designated and sign-posted.</p>	<p>The SPD and other guidance documents recommend a proportion of parking is designated as accessible and for use by blue badge holders. Requiring all on street parking to have accessible dimensions will result in excessive space requirements impacting the public realm and provision for other modes.</p> <p>Paragraph 2.12 requires a % of non-residential EV bays to be enlarged for disabled access. We will add a signpost to PAS 1899 guidance on accessible EV parking. On street EV provision would not normally be associated with new development and is more likely to be delivered by council funded programmes. In line with Building Regulations Approved Document S, we would not seek additional EV/accessible EV provision for unallocated (i.e., 'associated') spaces.</p>

Ernie Boddington, Chair of MK Centre for Integrated Living	13	Part 5	Designs need to be compliant to the BS and PAS referred to above. Wayfinding to these and particularly disabled parking and EV facilities should be clearly provided on the route to the location and throughout the construction, plus those to exit arrangements both normal and emergency use.	As above, we have included signposts to BS 8300 and PAS 1899 guidance with regards accessible parking provision.
Ernie Boddington, Chair of MK Centre for Integrated Living	14	Part 6	Couldn't this be incorporated into Part 3?	We have merged Chapter 6 'Cycle Parking Design' into Chapter 3 'Cycle Parking Standards'.

<p>Ernie Boddington, Chair of MK Centre for Integrated Living</p>	<p>15</p>	<p>Part 7</p>	<p>Again, Powered Two Wheelers need to be defined. Clause 7.1 - is Table 3 the correct one? Clause 7.9? Which Manual for Streets version is referred to? A redraft is in progress. Clause 7.10 and Diagram 5 - sizes are at variance with BS and Building Regulations. The increased length is welcome, but the width should reflect BS&BR. Why are both Diagrams 3 & 4 included. The space width does not account for all possible parking directions and seating position of the disabled person. The diagram does imply there will be greater width available. The use of hatching should accurately represent how spaces should be laid out rather than being illustrative. Dimensions are quoted for current conditions however shouldn't the standard address the situation where Accessible and Adaptable housing is incorporated as is then designed to accommodate disabled residents. Clause 7.12 Parallel parking Bay size given is not compliant with British Standards / Building Regulations and a compliant dropped kerb should provide in conjunction with the bay. This clause also refers to the location of the parking facilities to facility they are serving which perhaps gives the impression it only applies to on-street parking and quotes those bays should be within 50metres, but Even Inclusive Mobility requires more than that which should similarly be incorporated. Parking facilities should also incorporate larger bays as defined in BS 8300.</p>	<p>We have added the definition for Two Wheelers to paragraph 6.1, corrected the reference to Table 4 for two-wheeler standards, removed Diagram 4 from the Draft SPD, and clarified that it is Manual for Streets 2007, or as updated, that is referenced in Paragraph 7.3. Regarding Diagram 5 in the Draft SPD (now Diagram 4), we have relied on the dimensions provided in the 'MKCC Highways Guide for Developers' as this reflects the dimensions of parking spaces agreed in MK (2.5m x 5m). The overall dimensions in Diagram 4 match (exceed in respect to length) those in the DfT Inclusive Mobility Guidance. We have signposted BS8300 guidance with respect to parking for accessible and adaptable housing. We have replaced Diagram 6 in the Draft SPD with Figure 3 in BS8300 'example of a designated on-street parallel parking space'. We have added a signpost that the SPD should be read in conjunction with BS 8300.</p>
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Ernie Boddington, Chair of MK Centre for Integrated Living	16	Appendix B	Car Clubs – we note no requirement is included for Car Clubs to be fully compliant with all relevant Accessibility and Equality legislation, standards, and guidance. Shouldn't all EV charging facilities be in accordance with AD-S and BS 7671. The Accessibility Requirements should be in accordance with PAS 1899.	We have added wording to Paragraph 7 in Appendix A clarifying our expectations that car club bays in new developments should be in publicly accessible off-street parking bays and adhere to the size of accessible EV bays in line with PAS 1899. At minimum, passive provision for future EV charge point supply should also be installed to car club bays.
Lynn Maddocks, on behalf of Broughton and Milton Keynes Village Parish Council	17	Table 2	We have noted that accessibility Zone's 3,4 and 5 under Build to rent are marked as N/A. Could we have clarification on why this has been decided, have you evidence of build to rent having lower levels of car ownership? Milton Keynes is a growing City, people moving here will have family networks in other areas and will continue to drive/own vehicles. Not having parking spaces for these properties will inevitably lead to significant on-road parking which will lead to all the issues that that brings. Parking for these properties could also spill over into adjacent roads, causing congestion issues and access ones for larger vehicles I.e., Fire appliances.	To clarify, the N/A relates to the fact that we would not expect Build to Rent developments to come forward in Zones 3, 4 and 5, and if they did, given the lower accessibility in these locations, a reduced level of parking provision would not be appropriate. Nonetheless, if a Build to Rent development were to come forward in Zones 3, 4 and 5, we would apply the standard residential standard. We will amend Table 2 to make this clearer.
Beth Dove, on behalf of West Bletchley Council	18	Zones	West Bletchley Council supports the revisions of the parking SPD in relation to the area off West Bletchley in Zone 4 however objects to the proposal to change of the station quarter into Zone 2 which will result in a lower parking requirement for any future development.	The available evidence and zone designation methodology show that the station quarter is a highly accessible location and is likely to become more so in the future with delivery of East West Rail. Therefore, Zone 2 standards are appropriate.

Carter Jonas, on behalf of, Landsec	19	Paragraph 1.20/1.21	<p>Whilst we support the general principles of the draft Car Parking SPD, we want to highlight that where car parking already exists (as part of an existing development in Zone 1), should a reduction be proposed through a planning application, evidence which could include the use of ANPR data (over a stated period) is required to be submitted. If the evidence supports the reduction, in consideration of the general sustainability of Zone 1, proposals should then be supported by the Council.</p> <p>We therefore request reference to reductions in the level of car parking within Zone 1 being supported (where this is justified) is incorporated into the Supplementary Planning Document.</p>	Policy CT10 in Plan:MK already takes this approach to new development proposals. It states: "All development should meet the Council's full parking standards, unless mitigating circumstance dictate otherwise."
Carter Jonas on behalf of Tarmac	20	Paragraphs 1.7-1.8	<p>Paragraph 107 of the NPPF sets out the Governments approach to setting parking standards. It is noted that the SPD requires developments to meet the required standards unless mitigating circumstances apply. Tarmac's site forms part of the SEMK allocation. The SEMK SPD asks for the submission of Design and Access Statements and Design Codes, including car parking details, to be submitted after the Outline stage but prior to Reserved Matters. Tarmac is committed to delivering the site in an integrated manner as part of the wider strategic site. The flexible approach to car park provision set out in the PS SPD is supported, but it is important to ensure that smaller sites are afforded this flexibility as well as larger sites, in a holistic way. This rationale should follow through to the detailed design stages of the design process (D&A Statements, Design Codes, Reserved Matters) to the deliverability of smaller sites is not compromised or diluted.</p>	Noted. We will apply the Parking Standards to all developments consistently. In addition, we expect development within the SEMK to come forward in an integrated manner, with all proposals having appropriate regard to adjoining sites, as well as the infrastructure delivery requirements of the MK Tariff agreement for the overarching site. We encourage developers to proactively engage with us and the other landowners and developers in this respect, to ensure a joined-up transport approach.

Carter Jonas on behalf of Tarmac	21	Paragraph 1.28, The Zones	Some areas are not placed in an accessibility zone, given that they are not yet undeveloped. The SPD states that the parking requirement in these areas will be agreed when detailed planning applications are submitted based on an assessment of public and active travel accessibility, development density and sider placemaking objectives. Given that the SEMK SUE will be a large sustainable urban extension to Milton Keynes, comprising many ownerships and individual planning applications, we ask that the SEMK site be considered as a whole, and zones created to provide more clarity, before planning applications are submitted. The SEMK SPD should provide enough guidance and clarity to enable zones to be created for individual parts of the SEMK area.	Noted. To aid the process of deciding which standards would be appropriate within the SEMK allocation, we have included additional guidance on the methodology we've used to designate the accessibility zone boundaries. See Paragraph 1.21.
Carter Jonas on behalf of Tarmac	22	Paragraph 4.39 - On-street parking	On-street car parking is an issue in many new developments in MK, with congestion, impassable footways and safety being key issues. We do not consider 'wider parking streets' as set out in the SPD to be a potential solution to this. Many sites do not have the space for wider roads, except where these form principal roads in central areas with more space. This approach would also not support increased density where direct access is required from properties onto the highway. Public squares are a land-hungry solution which are more suited to central key development areas which should be considered at the master planning stage. For smaller parcels in less central areas, such as Tarmac's land, we would like to see smaller laybys for up to 3 cars peppered around the development. This solution is less land hungry and can be included in standard residential areas, allowing safe highway access.	As noted in Chapter 1 of the final SPD, review of Chapter 4 'Parking for Residential Uses' was not within the scope of this SPD update. However, it should be noted that paragraph 4.41 of Chapter 4 already allows for the suggested layby approach.

Carter Jonas on behalf of Tarmac	23	Paragraph 2.3 - Parking for Electric Vehicles.	We support MKCC's policy aim of increasing uptake of alternative fuel vehicles. We note that the standard for new residential developments requires 1 active EV charging point per dwelling and that additional active and passive provision is supported. We would like the text amended so that the developer's responsibility is to only deliver cable routes into new homes which can then be used for charging points. In a fast-moving EV market this will avoid the installation of expensive infrastructure that may soon be out of date.	This would represent a change in policy given Plan MK Policy CT6 requires "new residential developments will be required to provide electric charging points, at a rate of 1 charging point per dwelling at each dwelling." Such a change is therefore outside the scope of this SPD.
Gloucestershire County Council Minerals and Waste Plans	24	All	M&W officers have reviewed the consultation information and at this time do not consider it likely that materially significant mineral and waste impacts will emerge because of implementing the consultation's proposals. M&W officers have reviewed the consultation information and have no further comments to make.	Noted.
Bletchley and Fenny Stratford Town Council	25	Part 2 HMOs	The Council supports most of the proposed measures in the SPD, including the new 5 zone system. However, we are concerned that the lower vehicle parking standards for houses in multiple occupation are inadequate. Our experience is that many houses in multiple occupation in our area are conversions often located in areas where the demand for on-street parking is already considerable. The reduced parking standards for HMOs will affect both the residents of the HMOs who do not necessarily rely entirely on public transport and the neighbours of these properties.	A joint response is given to these two comments. We acknowledge the concerns raised regarding the impact of proposed changes to HMO standards. We have therefore reviewed the evidence used to inform the proposed changes to HMO standards. Following this review, we have determined that the impact of the new SPD is minimal with parking requirement reductions limited to a single space, and in some cases no reduction at all. In addition,

Campbell Park Parish Council	26	Table 2	<p>the standards for residential dwellings and HMOs should be the same across the parish, at the level as set out for Zone 4. Each resident of a HMO is likely to have their own vehicle and parking pressures are increasing. The standards in Oldbrook, Springfield and Fishermead need to be increased from the existing requirements - areas with increased concentrations of HMOs have increased parking issues and Zone 4 requirements would address these issues. Many people in HMOs are employed on the edges of MK in warehouses or similar, making private vehicles more of a necessity due to unsocial working hours and a lack of public transport to support these working patterns. The requirement to demonstrate availability of shared parking spaces to meet the required standard through submission of a parking survey, alongside a planning application, is welcomed.</p>	<p>most registered HMOs (66%) are within the area of CMK and its immediately adjacent surrounding estates, with very few in the Bletchley area. Moreover, the estates surrounding CMK can generally accommodate an intensification of occupants due to their wide, long, and straight boulevards, often with central parking areas, a fact acknowledged in the current HMO SPD (2012). Furthermore, the limit to the overall concentration on the proportion of HMO properties in any given area (35%) ensures the maintenance and creation of mixed, balanced, sustainable, and inclusive communities in line with Policy HN7 in Plan:MK and reduces the risk of associated parking issues. Lastly, as stated in the SPD evidence base, Milton Keynes Council declared a Climate Emergency in December 2018. As such, the parking standards for new development should be moving towards a more stringent approach to encourage greater use of alternative transport modes. On this basis, we consider the proposed changes to the HMO standards to be appropriate.</p>
Campbell Park Parish Council	27	2.11	<p>MKCC should set its standards above minimum Government guidelines and increase the number of spaces for blue badge holders. Spaces should be located conveniently for users; it is noted that many disabled spaces have been displaced to make way for EV spaces in CMK, with disabled parking spaces being less convenient and further away for people with disabilities.</p>	<p>There is no data available to support a need for Milton Keynes to have higher levels of blue badge provision than as stated in national guidance and the SPD. We agree that designated accessible spaces should be located close to building entrances and include standards on this at Paragraph 7.5.</p>

Cllr Jenni Ferrans, MKCC	28	Zones	<p>It is inappropriate to apply the same standards to Campbell Park as for CMK, due to distance from facilities and fewer bus routes. However, it has better accessibility than suburbs so perhaps Zone 3 is appropriate. It is inappropriate to not give SEMK and MKE a zone - this should start from default position of zone 4. The proposal to reduce the required parking provision for dwellings in some areas is not supported, given higher car ownership, with reference to Monkston and Kent Hill.</p>	<p>We recognise that the Campbell Park area (north east of Marlborough Street) has lower accessibility than the rest of the Central Milton Keynes (CMK) area as defined on the Plan:MK Policies Maps. However, it is an edge of city centre location close to retail, employment, and frequent central bus service routes. It is therefore considered appropriate for it to be designated as within Accessibility Zone 2, along with comparable areas such as Fishermead and Conniburrow.</p> <p>As stated in the SEMK and MKE Development Framework SPDs, as it has not yet been confirmed what public transport accessibility will be in these areas, and this detail will only be known at the detailed design stages, it would not be appropriate to pre-set the Zones for these areas.</p> <p>Part of the work on the SPD has involved a review of public transport accessibility. To guide which areas should be in Zone 3, we have applied a 10-minute walking catchment from local/district centres, such as Kingston. The full guiding criteria for the accessibility zones are in Chapter 1 of the SPD. Some areas previously seen as being in less accessible locations have accordingly been rezoned because of this new evidence, such as parts of Monkston and Kents Hill.</p>
Cllr Jenni Ferrans, MKCC	29	Parking Tables	<p>The references to zones in residential institutions needs to be updated for the new ones grouping 1-3 and 4-5.</p>	<p>Noted. We have made the suggested changes.</p>

Cllr Jenni Ferrans, MKCC	30	Parking Tables	The reference to MK: U in the standard for student accommodation should be removed - MK: U is not the only university in MK. It should also be clarified that this relates to undergraduate accommodation, not post-grad HMOs which are generally more scattered with no specific transport arrangements.	Noted. We have removed reference to MKU.
Cllr Jenni Ferrans, MKCC	31	Parking Tables	Flats - Campbell Park is too far out from CMK and has too few facilities to count as Zone 1 - it should be Zone 3.	It is considered appropriate to designate Campbell Park as Zone 2. See response to Comment 28.
Cllr Jenni Ferrans, MKCC	32	Parking Tables	We need a standard for larger homes. 5 bed homes should have an additional space and larger homes need an extra space per two bedrooms.	We do not have evidence to substantiate changes to the standards currently. New evidence associated with the new Local Plan, outputs from the LTP5 work, and Census 2021 data on car ownership, household size, bedroom numbers and house location will enable a review of this in due course.

Cllr Jenni Ferrans, MKCC	33	Parking Tables	<p>Build to Rent - no reason to suggest BTR will need any less parking than ordinary flats. the nature of schemes varies, and reductions should be case specific depending on other encouragements to reduce car use. I would prefer BTR to be dealt with on a case-by-case basis like Sui generis. The definition of BTR also needs to be specific enough to eliminate the many small blocks of out of centre flats now owned by institutions.</p>	<p>The Project Centre Parking Standards Evidence Report provides the evidence for the proposed Build to Rent (BTR) standards. This includes secondary data analysis from 2011 national census data comparing tenure to car access, and analysis of BTR developments in London, feedback from local BTR providers, review of local planning applications, and analysis of local 2011 census data comparing tenure with car access by location. This underlined lower car ownership in rented vs owner occupied tenures, with even lower car ownership rates in more accessible zones of the city. In addition, the Project Centre evidence informs a specific definition of BTR development in the SPD which sets it apart from 'ordinary flats'. We consider this evidence a sufficient and robust basis for the proposed standards.</p> <p>It would not be appropriate to limit the BTR definition based on geographic location. A BTR scheme is BTR, wherever its location. However, as noted in the response to Comment 17, we will apply the standard residential parking standards to BTR developments in Zones 3, 4 and 5, given the lower levels of accessibility in these areas relative to Zones 1 and 2.</p>
Cllr Jenni Ferrans, MKCC	34	Parking Tables	<p>HMO zone 4 standards have been reduced. This far out of CMK the HMOs are usually older or professional people and have many cars - and bus services are very sparse and MKConnect is not easily available at busy times when they need to get to work etc. The standard should be as for Zone 5.</p>	<p>Under the old standards, a 5 bed HMO would require 4 spaces (5-1). The new standards would require 3.3 which would be rounded up to 4. The difference is very marginal for other HMO sizes and reflects a move from a 2-zone approach to the new 5 zone approach which takes more account of accessibility.</p>

Cllr Jenni Ferrans, MKCC	35	Parking Tables	The 1km separation for isolated shops is too far, I think. This in many cases would mean that a shop didn't count as isolated even when the next public facility of any sort was on the next grid square and the shop served a large area. 500m is more appropriate I think.	The 1km separation distance reflects the Government definition of isolated shops as set out in The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. It is not within our remit to amend this.
Cllr Jenni Ferrans, MKCC	36	Parking Tables	The community centre requirement is a considerable drop compared with the specific requirements for the activities that often happen there e.g., fitness centres, religious assembly, or meeting. This seems inappropriately low for buildings that often in reality support these same wide area uses at times when public transport is sparse.	The standard for 'Halls or meeting places for the principal use of the local community' reflects the standard for Public Halls contained in the 2016 SPD. This standard was not in the scope of the SPD review. Therefore, the standard has been copied across like for like from the 2016 SPD.
Cllr Jenni Ferrans, MKCC	37	Parking examples at the end	Para 7.8 I think you've missed out the amount of additional space that should be provided. Paras 7.11 and 7.12 are almost duplicates.	Paragraph 7.9 has been updated to clarify that the additional space requirements are shown on the diagrams. We have removed the second duplicate paragraph.
Angie Ravn-Aagaard, on behalf of, Bletchley Park Area Residents Association	38	1.16	1.16 references the low-density design of MK which favours car travel. This was a deliberate decision to attract new residents, visitors and employment using vehicles to travel. While MKCC's vision of increased public transport and carbon neutrality is accepted, insufficient account has been taken of older areas in the city with more traditional urban forms.	We acknowledge residents' concerns regarding the impacts of traffic in older areas of the city, some of which pre-date the New Town. When preparing this SPD, we have been careful to ensure that all relevant and robust evidence has been considered, so that the standards are appropriate to the areas to which they apply.

<p>Angie Ravn-Aagaard, on behalf of, Bletchley Park Area Residents Association</p>	<p>39</p>	<p>1.21</p>	<p>Reference to statement that developers may provide less or more than the standard. In my experience, developers tend to try to provide less parking with more residential units, and inadequate facilities/services. Often applications where less parking is proposed are approved for fear of appeals and possible loss of S106 contributions.</p>	<p>We appreciate that local communities have concerns regarding the levels of parking and facilities provided with new development. We will always determine planning applications in a robust manner, taking account of all relevant material considerations and assessing development proposals to ensure they accord with development plan policies, and national legislation and policy where relevant. Financial contributions are only sought where these would mitigate the impacts of proposed development in accordance with the tests for planning obligations listed in Paragraph 57 of the National Planning Policy Framework 2021.</p>
<p>Angie Ravn-Aagaard, on behalf of, Bletchley Park Area Residents Association</p>	<p>40</p>	<p>1.12</p>	<p>Concern is raised regarding potential for amendments to existing reserved matters schemes to take account of new parking standards as well as pre-existing design codes, which result in additional profits for developers.</p>	<p>As noted in Chapter 1 of the SPD, changes to the standards have only been proposed where there is robust and relevant evidence to demonstrate they are appropriate and would avoid adverse consequences.</p>
<p>Angie Ravn-Aagaard, on behalf of, Bletchley Park Area Residents Association</p>	<p>41</p>	<p>1.29</p>	<p>Concern is expressed that the Zone 2 designation around Central Bletchley/Queensway area will lead to more densely populated residential development and benefits for MKDP marketing of the former Police/First Station site. Significant concern is raised about the lack of parking provision and enforcement in the area, and complaints about the issue in the area are high. Lack of Blue Badge spaces and spaces for local businesses, who have to rely on parking in nearby residential areas.</p>	<p>As stated in Chapter 1 of the SPD, the Zone 2 designation in this location has been drawn to reflect the guiding criteria for Zone 2: a "10-minute walking catchment from town centres with high frequency public transport interchanges (bus and rail)". Given the high level of accessibility in this area it is considered appropriate class it as Zone 2. Parking enforcement, resolving pre-existing parking issues, and reviewing business parking standards are not within the scope of this SPD review. However, we have taken care to ensure that the new standards for blue badge provision consider all relevant national standards and guidance, such as Inclusive Mobility and PAS 1899.</p>

Angie Ravn-Aagaard, on behalf of, Bletchley Park Area Residents Association	42	1.32	CMK has abundant car parking both on-street and via multi-storey carparks, and despite proximity to public transport, more multi-storey carparks have become available in the last 2 years. The whole of Bletchley/Fenny Stratford also has higher parking requirements and should be in Zone 3, as a minimum.	As noted in the above response to Comment 41, the Zone 2 designation in Bletchley is considered appropriate, as is the Zone 3 designation towards Fenny Stratford, and the surrounding Zone 4 boundaries.
Angie Ravn-Aagaard, on behalf of, Bletchley Park Area Residents Association	43	4.5	4.5 notes parking problems seen in new developments are also seen in Bletchley, in older areas and within new schemes permitted with insufficient parking. Once developments are completed and roads adopted, it is the local council that is left to deal with these parking problems.	These comments are noted. MKCC will work with local town and parish councils to resolve traffic issues in their area. Although, as above, resolving pre-existing traffic issues is not a requirement of new development. Nonetheless, through application of this SPD alongside other relevant considerations when determining applications, we will ensure new development does not exacerbate pre-existing issues.
Guy Robinson, on behalf of, Historic England	44	All	Support for MKCC's ambition for modal shift away from the car and acknowledge role of parking standards in this. Concur that a single standard is inappropriate.	Response and support for modal shift ambitions noted.
Guy Robinson, on behalf of, Historic England	45	All	We seek and recommend explicit reference to the historic environment where appropriate in the SPD, acknowledging that some areas are more environmentally sensitive than others. We highlight the importance of minimising harm to the historic environment through sensitive design in conservation areas and where possible enhancing the local area. Paragraphs 4.10 in the main document and 31 in Appendix C should refer to environmental sensitivity and relevant designations. these changes would reflect Paragraph 8.63, Policy NE6 and Policy D2 in Plan:MK which refer respectively to the potential visual impact of parking, lighting (which may occur in parking areas), and the importance of locally inspired development proposals where appropriate.	These comments are noted. We have amended Paragraph 4.10 in the main body of the SPD, and Paragraph 31 in the EV Guidance Note in Appendix B, to have references to the conservation and enhancement of heritage assets, and the role that the siting/design of parking and EV charging have in these achieving these objectives.

Guy Robinson, on behalf of, Historic England	46	All	Reference to Streets for All in the SPD is recommended. Streets for all contains advice on the role of parking, including cycle stands, streetscape/public realm improvements in how historic environments are perceived and experienced, and their value protected and enhanced. We also recommend reference to our regionally specific advice 'Streets for All East of England'.	We have added reference to these documents at Paragraph 4.11.
Guy Robinson, on behalf of, Historic England	47	All	Liaison with the Council's Archaeological Officer will be required when proposals (such as those that support the charging of electric vehicles) have the potential to impact on assets of archaeological interest.	We have added this wording to Paragraph 31 of the EV Guidance Note in Appendix B.
Guy Robinson, on behalf of, Historic England	48	All	This opinion is based on the information provided by the Council in its consultation. We reserve the right to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.	Comment noted.
Iceni Projects on behalf of GLP	49	Para 1.20.	We consider reference to the need of 'rigorous' assessment when considering if mitigating circumstances justify deviation from the parking standards to not be in line with national and local planning policy. The wording of this section is too onerous and should be amended.	Use of the word 'rigorous' has been unchanged from the 2016 version of the SPD. However, we have reworded this section to reference Policy CT10 in Plan:MK and reflect our expectation that any evidence submitted to justify departure from the standards is robust.

Iceni Projects on behalf of GLP	50		<p>We consider the standards for B2 and B8 land uses to be more than what is required by users of these types of sites. The evidence base for the proposed standards should have been published alongside the draft SPD. To be assured that the standards have been based on clear and compelling evidence, we would expect to see documents which detail the likely impacts of the proposed standards across different areas, analysis of other comparable authorities, and an assessment of the existing and potential public transport accessibility within the different areas.</p>	<p>As noted in Chapter 1 of the SPD, review of the parking standards for B2 and B8 land uses was not within the scope of this SPD update. As part of the scoping work, current standards were benchmarked to comparator local authorities. Those which were considered in line with other authorities or where there was little evidence to suggest they were out of step, were not included in the review.</p> <p>As such, the standards for these uses are unchanged from the 2016 version of the SPD and we do not have sufficient evidence to justify changes at this stage. However, we shall review these standards when preparing the Milton Keynes New City Plan and more evidence, such as 2021 Census car ownership data and an updated LTP5 transport strategy are available. In the meantime, as stated in Policy CT10 in Plan:MK, developers can propose lower parking provision than is set out in the standards at planning application stage, where they have site specific evidence to justify the proposed levels of provision.</p>
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Iceni Projects on behalf of GLP	51		Furthermore, the reference in paragraph 1.15 to considering existing parking levels in Milton Keynes is no longer consistent with the Decide and Provide approach (advocated by the DfT in its aim to decarbonise transport), which encourages a shift away from planning for future needs based on past trends, towards an approach based on desired outcomes.	We agree with the need to move towards a Decide and Provide approach to determining parking standards. However, for the reasons explained in Chapter 1 of the SPD, our evidence base work for this document has been very targeted and a wholesale review has not been justifiable. A future review of standards benefiting from updated analysis of car ownership data in MK using the 2021 census, and an updated transport strategy (LTP5) will enable a more widespread review of parking requirements.
Iceni Projects on behalf of GLP	52		The evidence obtained by GLP, detailed in the enclosed technical note prepared by Hydrock, indicates that the application of the parking standards on key warehouse sites in the city would have resulted in significant over-provision of spaces, compared to actual usage. A rigid application of standards at the DHL and John Lewis 3 sites would result in 33% and 63% respectively of the car park spaces remaining vacant.	See response to Comment 50.

Iceni Projects on behalf of GLP	53		<p>Changes to working patterns, automation, lack of space and labour shortages in distribution has led to less people being needed on sites and less parking demand. The consultation document does not demonstrate that any account has been given to such considerations, or that the previously adopted standards have been reviewed to reflect recent and likely future employment trends. Accordingly, we do not consider that the standards proposed are justified as they are not based on the relevant evidence. The proposed standards would result in an inefficient use of land, contrary to Para 119 of the NPPF. It would continue unsustainable transport modes, contrary to MKCC's climate emergency and its aim to be carbon neutral by 2030 and carbon negative by 2050. Lower parking requirements for B2 and B8 uses would be consistent with MKCC's overall objective of a modal shift away from private car travel.</p>	See response to Comment 50.
Whitehouse Community Council	54		<p>The proposed parking allocation for 2-bedroom flats is 1, yet the parking allocation for a [2] bedroomed house is 2. The parking should be the same, with 2 parking spaces allocated for each 2 bedroomed flat. This discrepancy will lead to a lack of parking availability for those residing in flats and apartments. This will lead to parking issues, especially in those areas that have a higher number of dwellings per hectare.</p>	<p>These standards are unchanged from the 2016 version of the SPD, which included evidence at the time to justify them. As noted in Chapter 1 of the SPD, review of the vehicle parking standards for residential dwellings was not within the scope of this SPD update.</p>

Savills on behalf of Bletchley Park Holdings Ltd	55		<p>We suggest that Block G at Bletchley Park is rezoned from Zone 4 to Zone 1 (care-free developments), or if MKCC considers Zone 1 to not be appropriate, Zone 2. We consider the site's proximity to Zone 2 supports the rezoning.</p>	<p>As noted in Chapter 1 of the SPD, the standards for office development were not up for review as part of this SPD update. The question here is therefore whether the site at Block G should be included within the Zone 2 boundary including central Bletchley. A review of the site has determined that: Block G at Bletchley Park is approximately:</p> <ul style="list-style-type: none"> • 10-minute walk to the rail station entrance. • 14 min walk to Queensway western end. • 15 min walk to bus station. <p>Given the Zone 2 definition (10 minute walking catchment from town centres with high frequency public transport interchanges (bus and rail)-Bletchley & Wolverton rail station and bus interchanges), we consider that the location is correctly zoned as it is too far from the town centre and bus station to be classed as zone 2 or 3. However, in line with Policy CT10 in Plan:MK, the applicant can make the case for reduced parking provision, based on mitigating circumstances, when proposing a development at application stage. In addition, it is noted that the standards at the site remain unchanged from the 2016 version. The emerging SPD would not increase the parking requirement at the site compared to its predecessor.</p>
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<p>Savills on behalf of Bletchley Park Holdings Ltd</p>	<p>56</p>		<p>Evoked Transport Planning Consultants have provided a technical advice note in support of this representation, in summary this concludes:</p> <ul style="list-style-type: none"> a) The proposed office parking standards are in excess of standards adopted by other local authorities and far exceed the BREEAM recommended parking standards. b) The proposed standards are in excess of the majority of parking ratios within TRICS. c) The Draft SPD does not take into consideration the important changes consented to Bletchley Railway Station and the introduction of the East West rail line in 2024. Proximity of the site to the rail station (8 minutes' walk) and nearby bus stops (at most 7 minutes' walk) supports rezoning the site to a Zone with less parking requirement. High public transport accessibility zones are characterised as within an 8-minute walk of stops. d) MKC should seek for developments to fund the consultation of introducing parking restrictions rather than seeking overprovision of site parking which is counter to policy objectives. e) MKC state that office standards will be revisited following the release of 2021 Census data. However, a "decide and provide" approach should be taken to parking rather than relying on a predict and provide approach. 	<p>As noted in Chapter 1 of the SPD, office parking standards were not included within the scope of the SPD review and so no evidence to support changes was collected. As part of the scoping work, current standards were benchmarked to comparator local authorities, and those which were considered in line with other authorities or where there was little evidence to suggest they were out of step, were not included in the review. Whilst we should be moving away from a predict and provide approach, consideration of existing levels of car ownership and travel to work data should be part of the evidence when making changes to the standards to fully understand the likely implications.</p>
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Savills on behalf of Bletchley Park Holdings Ltd	57		The developer seeks to support Plan:MK objectives by contributing to office floorspace in the borough by refurbishing Block G. However, the high quantity of parking standards proposed in the Draft SPD would make bringing the site forward for office development unviable. Where the Site is recategorised as a car-free zone or within Zone 2, a forthcoming redevelopment of the Site could provide sustainable transport initiatives such as a car club, sustainable travel vouchers, and improvements in the public transport networks.	As noted in the responses to Comments 55 and 56, the parking standards at the site remain unchanged from the 2016 version of the SPD. While we do not consider there is sufficient evidence to support rezoning of the site, the developer can, when applying for development of the site, propose reduced levels of parking subject to satisfactory mitigating circumstances being in place, in line with Policy CT10 in Plan:MK.
Savills on behalf of Bletchley Park Holdings Ltd	58		The MK Transport vision and Strategy identifies carbon emissions reduction as a key objective. Given that proposed and underway improvements to the railway station and delivery of East West rail will significantly improve accessibility in the area, requiring sites in the local area to provide high numbers of parking spaces (1 space per 30 sqm) would not align with the transport vision to reduce CO2 emissions through increased public transport, EVs and active travel. There are EV chargers approx. 0.4 miles from the site and there are existing active travel links to Bletchley Park.	As noted, the standards for office developments have not been within the scope of this review. While the likely impact of East West Rail on accessibility are acknowledged, its full delivery has not yet been consented so it is considered it would not be appropriate to justify significant reductions in parking requirement at this stage.
Savills on behalf of Bletchley Park Holdings Ltd	59		We consider the car parking standards proposed in the Draft SPD contradict the objectives and principles of the Sustainable Development Strategy and MK Transport Vision and Strategy. This is reinforced by use of GEA for parking standards calculations rather than GIA or GFA, which represent usable flood space for employees, and will therefore likely dictate the number of staff working there and respective parking demand. MKCC should revise the standards to reflect GIA or GFA.	For the reasons outlined above, we consider the proposed changes to the standards to be in line with Plan:MK. In many cases, the standards have not changed from the 2016 version. However, we acknowledge it is more appropriate to calculate parking provision based on the usable floorspace of a building. We shall therefore change the required floorspace metric to Gross Internal Area, to align with planning application forms.

Lichfields on behalf of St James Group Limited	60		St James has an extant hybrid planning permission (ref. 21/0099/OUTEIS) for most of the development planned for at MKE. While St James is generally content with the proposed parking standards, there are a few specific points which we raise at this stage given the design implications for MKE. In summary, additional design flexibility is sought within the SPD to better enable the delivery of streets which are not car dominant and adhere the urban design principles set for MKE in its adopted MKE Development Framework SPD (2020).	These comments are noted. We support the delivery of streets and development layouts which are not car dominant and achieve wider placemaking objectives such as (but not limited to) provision of appropriate green infrastructure, surface water management, and positive local character. We have included reference to the MKE Development Framework SPD, National Model Design Code and National Design Guide accordingly.
Lichfields on behalf of St James Group Limited	61	Para 1.28	St James support the proposed approach whereby this SPD does not set parking zones for the MKE urban extension. We agree that relevant parking standards for MKE should be agreed through the development management process (i.e., as part of design codes). Through this process, the specific parking arrangements for MKE can take into consideration the density, character, and proximity of each Character Typology to the Mass Rapid Transit route. They can also reflect the Council's own design aims for the urban extension as described in the adopted MKE Development Framework SPD (2020).	Comments noted.
Lichfields on behalf of St James Group Limited	62	Table 2: Vehicle Parking Standards	The currently stipulated amount of unallocated parking could be reduced as delivering the current level in MKE, where some areas are to be high density, with lots of active travel routes and a mass rapid transit route, would lead to unnecessarily wide streets. Instead, there should be an emphasis on the sensitive integration of unallocated parking into the design of streetscapes and neighbourhoods. Good design and controlled parking zones can also reduce parking on verges/footpaths etc.	Review of the levels of unallocated parking was not within the scope of the SPD review. However, we agree that it is appropriate to design streets to avoid over-dominance of cars within the street scene. Therefore, we have included reference to relevant design guidance. However, we will consider unallocated parking levels in the scope of a future review, with evidence gathered via site surveys to understand visitor/unallocated parking use.

Lichfields on behalf of St James Group Limited	63	Para 4.4 (garages)	<p>Para 4.4 states that garages do not count as parking spaces. We suggest this is loosened to allow garages to count where justified. For example, garages can be suitably sized to provide additional storage functions (i.e., bicycles, sports equipment, tools, and appliances) alongside the parking of a car. This flexibility will allow architects to design out additional car parking spaces where garage parking can be justified and demonstrated to be of a specification/size that encourages their use as parking (rather than storage etc.).</p>	<p>Use of garages for bike storage will be included in additional content/signposting to cycle parking good practice to be added to the updated SPD. However, no evidence has been gathered to suggest that our current stance not to include garages in the parking provision calculations is inappropriate.</p>
Lichfields on behalf of St James Group Limited	64	Para 4.5 & 4.22 (rear parking courts)	<p>Para 4.5 notes that rear parking courts “have not been well used by residents” and Para 4.22 states they have “proved unpopular” and “are therefore not supported as a parking option”. Against this, the MKE Development Framework SPD supports rear parking courts (see Table 4.3).</p> <p>In our view – in accordance with the MKE Development Framework SPD – well-designed, overlooked rear parking courts are possible and can form an acceptable parking solution. They can be an effective means of reducing car dominance on-street. The quality, layout, practical accessibility, and security of these spaces can be controlled via future design codes. The SPD should therefore include flexibility to support rear parking courts where justified and well designed to overcome issues often associated with such forms of parking.</p>	<p>We have no evidence that the content in paragraphs 4.5 and 4.22 are not still relevant, and the matters raised concerning rear parking courts are backed up by the other publications referenced. However, paragraph 4.24 provides some flexibility that they could still be permitted (“It is however accepted that for certain streets, frontage access for vehicles from the street can’t be achieved or is not permitted and alternate parking solutions should be sought”).</p>

Lichfields on behalf of St James Group Limited	65	Para 4.17 (tandem parking)	<p>Para 4.17 sets out a presumption against tandem parking. Notwithstanding, where tandem parking is proposed an additional on-street parking space must be provided at a rate of one space per two dwellings with tandem parking (bullet 1). We propose that the policy be amended so that additional on street parking spaces are not required where justified. This is on the street to avoid car-domination of the streetscape.</p> <p>This restriction impacts on the ability to design intimate, narrower streets with a high degree of enclosure. This is because more on-street parking is required or the delivery of adjacent parking spaces. Such designs count against the creation of higher density, compact forms of neighbourhood. Instead, they enforce a more land-hungry suburban arrangement of plot layouts even when more compact forms of housing are intended to be provided at MKE (in accordance with the Design Framework SPD).</p> <p>Furthermore, it adds to the extent of grey infrastructure required to serve dwellings: plots become wider, therefore the length of road and below ground services per plot is increased.</p>	<p>Review of the levels of unallocated parking was not within the scope of the SPD review. However, we agree that it is appropriate to design streets to avoid over-dominance of cars within the street scene. Therefore, we have included reference to relevant design guidance. We will consider unallocated parking levels in the scope of a future review, with evidence gathered via site surveys to understand visitor/unallocated parking use. Moreover, developers can, when applying for development of the site, propose reduced levels of parking subject to satisfactory mitigating circumstances being in place, in line with Policy CT10 in Plan:MK.</p>
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Lichfields on behalf of St James Group Limited	66	Para 7.10 (disabled parking)	<p>The draft SPD (para 7.10) sets out that disabled parking bays should be of 6.1 metres by 4.7 metres where access is possible to the rear (e.g., perpendicular to the kerb). This is a larger space size compared to the previous parking SPD (para 7.12) and these proposed dimensions are above the British Standards guidance. It is also not clear from the draft text whether multiple bays can share the safety zone.</p> <p>We acknowledge that larger bays can result in significant benefits to user groups, and support them in principle, but flag that the enlarged spaces may not be suitable in all locations and will result in additional hardstanding. We therefore suggest Para 7.10 is amended to:</p> <p>“Parking for those with disabilities should align with relevant BS guidance, and where possible and feasible to do so Parking for those with disabilities should measure a minimum 6.1 metres by 4.7 metres where access is possible to the rear (e.g., perpendicular to the kerb), incorporating a safety zone around each side and the rear of the space. See Diagram 5 taken from A Highway Guide for Milton Keynes”</p>	<p>The dimensions in the SPD for 'Off-street parking for people with disabilities' (Diagram 4) are more generous than those recommended in BS8300 and are taken from the current 'Highways Guide for Milton Keynes' (2018). This is because the dimensions for a standard parking space in Milton Keynes are greater (5mx2.5m compared to 4.8m x 2.4m).</p> <p>The SPD will be updated to reference BS8300 as further guidance, so if the SPD required dimensions are problematic the BS8300 could be referred to in support of a reduction in the standard.</p>
MKCC Strategic Lead Education Sufficiency, Access and Attendance	67	All	From an education sufficiency perspective, no objections to anything contained within the Parking Standards SPD.	Noted.
MKCC Director of Planning and Placemaking	68		The SPD should specify the application of standards for car-free schemes as a result of Permitted Development and Prior Approvals.	Noted and agreed.
MKCC Director of Planning and Placemaking	69		Where car free schemes are approved, or are permitted, in the City Centre, new residents should not have access to resident parking permits. Such access would encourage car ownership and reduce the amount of City Centre parking that is available for office or leisure uses.	Noted and agreed.

MKCC Senior Landscape Architect	70	Chapter 4 - Parking for Residential Uses	It is disappointing to see that the residential standards have not been decreased. High parking standards in new residential developments, especially unallocated/visitor spaces, clash with the desire to have good quality green infrastructure and provision of street trees. The diagrams in the SPD that have been carried over from the 2016 SPD do not reflect best practice, e.g., Paragraph 4.47, Figure 9, and Figure 10.	The residential standards were not within the scope of this review. We shall however revisit these standards when we have more evidence from the 2021 Census, Local Plan evidence studies, and LTP5 preparation. We have deleted the figures mentioned and provided references to best practice guidance.
MKCC Senior Landscape Architect	71	All	What frameworks do we have in place for monitoring the impact of the existing (2016) standards?	We have not been monitoring the impacts of the existing 2016 SPD. However, as part of ongoing Authority Monitoring Report work, we shall discuss with our Development Management Team if there are any issues with how Policies CT6 and CT10 in Plan:MK and the SPD are being implemented.

<p>MKCC Flood and Water Management Team</p>	<p>72</p>	<p>All</p>	<p>The LLFA would seek the inclusion of wording that promotes to use of Sustainable Drainage Systems (SuDS) where practicable. Source control SuDS features can help provide ‘interception storage’, which can handle and treat some of the more frequent but smaller, polluting events. Such features are supported by Plan:MK, Policy FR2. New parking areas have the potential for underground attenuation storage for surface water runoff (such a geo-cellular crates), which can reduce peak flows to watercourses/surface water sewers reducing the risk of flooding downstream. Furthermore, the LLFA would seek that such areas are comprised of a pervious surface. Pervious surfaces can be either porous or permeable so there is variety of designs/approaches to choose from. Such surfaces can reduce the effects of pollution in surface water runoff on the environment. Where landscaping layout allows, these surfaces could be used alongside other features such as SuDS tree pits, filter strips, and rain gardens, thus contributing to amenity and biodiversity value as per Planning Practice Guidance. Further information/benefits/disadvantages can be found here: Pervious surfaces overview (susdrain.org). Where multi-storey car parking is proposed, green roofs and living walls should be considered as per Plan:MK, Policy SC1. A similar approach could be taken for cycle parking areas where a roof/cover is proposed.</p>	<p>We will add wording about water management and signpost relevant Policies in Plan:MK and national and local guidance.</p>
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MKCC Development Management	73	All	Suggest a requirement for 5+ bedroom homes while 3-4 homes remain a separate category. Proposed on basis of young people living at home longer, increased likelihood of extended family living in one home with more people of driving age, increase in house shares to save costs, unlikelihood of people enlarging homes beyond 4 homes to accommodate just children and no cars. Suggestion that 5+ bedroom houses require at least 3 parking spaces in Zone 4 and 4 spaces in Zone 5.	We have no evidence available now to support a change of this nature to the standards, which apply to the whole MKCC administrative area. However, in line with Policy CT10, it may be considered appropriate if site-specific circumstances justify it, for a greater number of parking spaces to be required for new dwellings with 5 or more bedrooms.
MKCC Development Management	74	All	Design of charging points in homes should avoid three pin sockets. Do we have ability to set threshold points for the conversion of passive to active provision? Can covers for two wheeled vehicles support PV charging? Guidance needed on design and choice of street trees near parking areas. Guidance needed on how to consider the unallocated space standards when looking at cases with an existing shortfall.	The SPD already has guidance saying we don't accept three-pin sockets. There is also no need to set standards for future EV parking provision over and above the standards. This is a matter for the site user/owner based on their personal/operational needs. We do not currently have the available evidence nor the ability to set a policy on PV chargers. SPDs cannot set new policy. Please refer to the street tree guidance in the Highways Guide for Developers. We will add wording confirming that we consider it unreasonable for unallocated space standards to be applied to householder developments. This is consistent with past and current planning practice in Milton Keynes.
MKCC Development Management	75		5+ bedroom dwellings and/or extensions to existing dwellings that lead to a 5+ scenario. Whilst this may not need another category in terms of requirement, there should be a clear acknowledgement that larger properties are likely to have a greater need for parking, and without it could lead to on street parking pressure/congestion.	See response to comment 73.

MKCC Development Management	76		Regarding new use classes, including flexible uses, we should perhaps acknowledge that such issues could be dealt with through creative use of planning conditions, say, where there would be a shortfall for a B use but not for another B use, for example.	We have laid out the new parking standards tables to be future proofed from use classes changes. We will assess flexible use schemes on a case-by-case basis, determining the appropriate level of parking based on the proposed uses and site-specific circumstances.
MKCC Development Management	77		There has often been difficulty in knowing what developers/assessors should do where a use isn't listed or is sui generis. We should not over burden developers or our highways colleagues with having to needlessly provide and assess transport assessments/parking assessments, but it should be made clear that this may be required in some circumstances	This is covered in the final row of Table 3.
MKCC Development Management	78		Rounding up of parking spaces needs to be clearer (in terms of is this only needed if greater than 0.5), or do we need to in all situations? For example, whilst we may round up parking spaces for a large new development, do we need to for a new single dwelling or an existing property adding a bedroom which technically needs 0.5 additional spaces, or whatever (do we round down in those situations)? Such clarification will be helpful to all.	Where it is calculated that part of a space is required, this should be rounded up. See paragraph 2.21.
MKCC Development Management	79		Consideration of historical permissions and what was envisaged for sites when they were developed. So, for example, where we have an historical supermarket and car park, they want to add a car wash taking up spaces – is the parking available left enough to meet the needs to the wider site? But this also goes the other way in terms of existing uses (and parking provision) on a given site where existing shortfalls are material considerations	We would assess this based on what the current standards say the Supermarket should have with respect to parking provision, to assess any shortfall. We would also take account of any additional parking requirements that would be associated with the car wash activity.

MKCC Development Management	80		EV charging points for COU of listed buildings/heritage assets. I.e., any requirement that may need LB consent. Do we need the details upfront and/or an acknowledgement that the historical significance of buildings maybe weighed in favour of non-provision (with justification)?	Noted. In line with Building Regulations Part S, we recognise that charging points should be sensitively sited and designed, or may not be appropriate entirely, in some settings due to local heritage value. We have included reference to relevant Historic England guidance on sensitive parking design.
MKCC Development Management	81		A general acknowledgement that parking provision may conflict with other policy requirements of Plan:MK (or its replacement) – where planning balance needs to be applied. Although you may consider ‘mitigating factors’ sufficient, but would stress this needs to be clearer in what this means, perhaps? Maybe an ‘including although not limited to’ para which enables the developer/assessor to apply more easily?	Noted. The ‘mitigating circumstances’ assessment contained within Policy CT10 in Plan:MK acknowledges that in some instances it may be appropriate for reduced/greater levels of parking provision. Paragraph 8.60 in Plan:MK provides examples of mitigating circumstances, as do Paragraphs 1.24-1.28 of the SPD.
MKCC Development Management	82		Do we need clarity that parking spaces need to be accessed safely via a dropped kerb etc?	Noted. This is more a highways guide/road adoptions matter rather than planning. However, this need is acknowledged in Diagram 5 of the SPD.
MKCC Development Management	83		Affirm that parking provision needs to be within the application site boundary, or the legal mechanism otherwise required to secure (being s106 etc)	Noted. We will add wording to this effect.
MKCC Development Management	84		The current standards do not appear to include two wheeled vehicle parking standards (Table 3 after para 7.6) for residential (not sure if this has been included in the revised standards?). There may be a need, particularly with more central developments where density and habits maybe different/suited to having a two wheeled vehicle?	Given the low amount of PTW ownership there is no evidence to justify specific residential PTW standards. However, through use of gardens/garages or existing allocated spaces with/without ground anchors, there will be spaces within developments that can be used for PTW parking.
MKCC Highways	85	Front cover	We suggest a different picture is used.	Noted and agreed.

MKCC Highways	86		Suggest the layout and format is tidied. m2 should have superscript. The key for the maps should be on each page. Remove para 1.2 in final version. Improve aspirations about cycle parking and facilities. cycle parking in figure 1 is not best practice. The document is too long - can the EV appendix be slimmed down/a link to the original paper provided instead?	Noted and agreed.
MKCC Highways	87		MKE and SEMK should be designated a zone. Developers have asked this already. How would the zone be decided and linked to the level of accessibility and facilities in the new areas?	As set out in the Milton Keynes East and South East Milton Keynes Development Framework SPDs, parking provision within these areas will be decided at the detailed planning application/design coding stage, when we have a better idea of the nature of development and transport connections to/from/within the respective areas.
MKCC Highways	88		The maps still contain some anomalies, such as the small area of land next to the railway within the SEMK allocation. There are some instances of both sides of a street being in different zones - e.g., Wolverton Road east of Park Avenue, Priory Street, and the veterinary centre in Chicheley Street in Newport Pagnell.	Noted. We have amended these where appropriate. However, the small area of land next to Woburn Sands is a legacy of the Plan:MK policy maps. The land in question is not in the town boundary but not in the SEMK area either. Therefore, it is designated open countryside and Zone 5.
MKCC Highways	89		The planning use classes, and descriptions of the uses should be added to tables 2 and 3. Where uses are shown as 'determined on a case-by-case basis or similar wording, it would be better if these were all grouped at the end of the table. Two groups at the bottom of the tables would cover this; 1. Sui Generis with a list of uses where we have a standard. 2. Uses that are either Sui Generis or fall within a use class but where we have no standard.	Noted and agreed apart from with respect to the use classes. To future proof this document we have removed reference to the use classes. However, we have provided clear descriptions for the uses specified.

MKCC Highways	90	Table 2	<p>General Industrial & Storage and Distribution – these still refer to the B1 use class but should now refer to E(g). Hotels – as with the other use classes, the standard for zone 4 should align with Zone 5, not Zones 2 and 3. The standard for Zone 4 should be 1 space per bedroom and 1 per 2m² of dining area. The mistake occurred in the 2016 standards and has been copied into this draft. Residential Institutions / Care Homes – this standard is another one that was incorrect in the 2016 standards. The separate standard for Zone 1 requires more parking (1:6) than zones 1 and 2 as mentioned in the box to the right (1:8) and results in there being two standards for zone 1. The notes under zones 2-5 refer to Zones 1-4, have no standard for Zone 5 and have a duplicate but contradictory standard for Zone 1. The separate standard for Zone 1 should be: Zones 1 - 3 resident parking 1:8 rooms + visitor parking 1:6 rooms + 1 per resident warden Zone 4 resident parking 1:4 rooms + visitor parking 1:4 rooms + 1 per resident warden Zone 5, as with other use classes presumably will match Zone 4.</p>	Noted and agreed.
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MKCC Highways	91	Table 2	<p>Provision of Education; Pupil age 11+ years – “1 per FTE 3 staff + 15 drop off spaces for the first 500 children and 30 thereafter”. This incorrect wording in the 2016 standards has caused problems on many occasions as the “and 30 thereafter” comment is not understood and is misinterpreted. There is an opportunity here to be clear on what is required. The text should be modified to read “1 per FTE 3 staff + 1 drop off space per 15 pupils for the first 500 children and 1 drop off space per 30 pupils thereafter”. However, it is also recommended that “500 children” is modified to 480 as this aligns with pupil numbers (120 per year group) and gives a multiple of 15 ($480/15 = 32$ but $500/15 = 33.33$). The modification of 500 to 480 applies to all zones.</p> <p>Hot Food Takeaways – this contains an error carried over from the previous standards. The standard as proposed would require more parking in zones 2 and 3 than it would in zones 4 and 5. E.g., 10m² of floorspace in Zone 3 would require 5 spaces (1:2m²) but in zone 4 it would only require 4 spaces (1:2.5m²). This is clearly incorrect and was raised in a previous response.</p> <p>It is understood that the standard was given the wrong way around in the 2016 standards. Zones 2 and 3 should 2.5m² and zones 4 and 5 should 2m².</p>	Noted and agreed.
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MKCC Highways	92	Table 3	<p>Re. hotel staff parking, it is not clear what it is 10% of – Staff FTE number? Number of car parking spaces? Number of rooms?</p> <p>Re. Residential institutions why is there no visitor parking requirement? the note in this section should clearly relate to all resi institutions, not just student accommodation. Given that it is requesting shower and changing facilities for staff, this is not the appropriate place for the note as there are typically no (or very few) members of staff in student accommodation. The note should be separate and placed above all the rows covering residential institutions. Re. HMOS the requirement of 1 visitor cycle parking space per HIMO seems disproportionate to the requirement of 1 space per 20 (C3) dwellings. We would not expect a single (C3) dwelling or even a pair of dwellings to provide a visitor space.</p>	<p>Amendment made for 1 parking space per 10 FTE hotel staff. There was no evidence for visitor cycle parking for residential institutions (student accommodation) in LTN 1/20 or local evidence. However, there would be no harm in retaining the 2016 SPD standard 1 per 20 beds, minimum of 2. The note for residential institutions has been relocated. It would however be reasonable to expect people to visit HMOs by bicycle so we will retain the HMO cycle standards.</p>
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MKCC Highways	93	Table 3	<p>Sale of goods - Why is this use split into small, medium, and large? It does not correspond to any use class distinction, nor does it relate to the 280m² for isolated stores. The vehicle parking standards are not split in this way.</p> <p>Furthermore, the proposed split and standards would give rise to parking provision out of step with the size of the store. For example:</p> <p>A 120m² store would require 2 visitor spaces and 2 staff spaces (1:100m²) whereas a 200m² store would require only 1 visitor space and 1 staff space (1:200m²) and a 400m² store would require 2 visitor spaces and 2 staff spaces (1:200m²) i.e. the same as a 120m² store. For similar reasons an 850m² store would 10 spaces (5 staff and 5 visitor) whereas a 1250m² store would only require 8 spaces.</p> <p>If a proportionately lower standard is required for larger stores, the standard should be, e.g. 1:100m² first 200m², plus 1:200m² for space between 200m² and 1000m² and so on. This would ensure that the larger the store, the more parking is required. It would also proportionately reduce the requirement as the store size increases.</p> <p>Consideration should be given to requiring larger stores to provide shower and changing facilities as per the employment uses</p>	Noted and agreed.
MKCC Highways	94	Table 3	<p>Sale of Food and Drink – why is there a note to discuss larger premises with HDM? If a proportionately reduced standard is required for larger premises, this should be detailed in the standards, not left for discussion. Furthermore, what constitutes “larger developments”? (Above what threshold?).</p>	Noted. We have removed this reference - a legacy from the 2016 SPD. We have clarified that if applicants have queries about the standards that they should contact the Planning Service in the first instance.

MKCC Highways	95		Uses which can be carried out in a residential area (office etc.) – the wording for this should match the B2 phrasing e.g., “1 space per 500 m2 with a minimum of 2 spaces” Rather than, “Minimum 2 for visitors and at 1 per 500 m2 thereafter”	Noted and agreed.
MKCC Highways	96		Furthermore, this category should require shower and changing facilities, as per B2 and B8 uses, but it does not appear to. Office employees should certainly be encouraged to cycle and have access to these facilities.	Noted and agreed.
MKCC Highways	97		Isolated Shops – the requirement here does not match the requirements for other shops. Whilst F2(a) use class is an important distinction for planning purposes, there is no difference in terms of parking provision. (NB. Vehicle parking standards for these shops match the standard for other shops).	Noted and agreed.
MKCC Highways	98		1.4 – this refers to Zone 1 in Table 1 but should refer to Table 2. Also, the reference to the Neighbourhood Plan is redundant as para 1.3 states it has been superseded.	Noted and agreed.
MKCC Highways	99		1.20 – the standards are neither maximum nor minimum standards. This paragraph should make that point clear and it would be very helpful if this paragraph was highlighted in bold text to emphasise the point.	Paragraph 1.8 has been amended to have this information closer to the start of the document, to raise the profile of this point.

MKCC Highways	100		<p>1.21 – the first bullet suggests that parking on nearby streets is acceptable. Whilst it is accepted that this is what the current documents states, this is not reflected in the Council’s approach to dealing with planning applications. Developments should provide adequate parking within the site or in appropriate facilities, not just on-street.</p> <p>This links to the text in 1.27 which states that a “clear surplus of parking space” is required.</p> <p>Both paragraphs should be modified to explain when off-site parking is appropriate, e.g., in car parks, lay-bys and marked out bays.</p>	In line with local appeal decisions and planning practice, while off-street and on-site locations are our preferred sites for parking, it is appropriate for on-street parking levels to be considered when assessing planning proposals. We have added further clarification after 'parking areas' that public car parks and lay-bys may be acceptable parking locations.
MKCC Highways	101		<p>1.25 & 1.26 – these relate to 1.21 and 1.22 and the flow of this section would be much clearer if they were moved to be immediately after 1.22. The current 1.23 and 1.24 also relate to 1.27 and would also benefit from the switch.</p>	Noted and agreed.
MKCC Highways	102		<p>1.31 – as per paragraph 1.4, this paragraph is now redundant</p>	Noted and agreed.
MKCC Highways	103		<p>1.32/1.33 – these mention Zone 1 and Zones 4 and 5 but not Zones 2 or 3. Given that the distinction between Zones 2 and 3 is minor and only reflected in BTR and HIMO requirements, an explanation of these zones seems crucial.</p>	Noted and agreed.

MKCC Highways	104		2.4 / Table 1 – no EV provision is required for blocks / groups of 1-9 apartments, but many apartment blocks are within this size range. A requirement for 1 shared EV point appears to be more appropriate. The same applies to non-residential uses where fewer than 10 vehicles spaces are required. These premises should also have a minimum requirement of 1 EV space. This also appears at odds with policy CT6 (C) which requires all new developments to have EV provision.	This section has been amended so that the EV standards for residential apartment buildings and non-residential developments with 10 or less spaces is in line with Policy CT6 in Plan:MK and Building Regulations Part S.
MKCC Highways	105		2.11 – the “(3)” in this paragraph seems to relate to the “(B)” in the equivalent paragraph in 2016. However, the B in the 2016 document referred to the B use classes (B1, B2 and B8) whereas the revised use classes are now B2, B8 and E(g). This should be amended accordingly	Amendments made to 2.11 accordingly - to specify the land uses (rather than the use class designations) and the respective rows in Table 3.
MKCC Highways	106		2.16 – this refers to Section 6, but Section 6 does not relate to PTW provision	Following relocation of the Cycle Parking Design Section and splitting Section 7 of the Draft SPD so the document flows better, this reference is now correct.
MKCC Highways	107		2.21 – BTR is not a use class and provision of BTR accommodation also requires controls to ensure that schemes are not submitted as BTR and then subsequently change to market housing. It is anticipated that a s.106 agreement controlling this would be required to ensure that developments remain as BTR.	Noted. Plan:MK states we shall use covenants in legal agreements to secure BTR units as BTR for a minimum of 10 years. Refer to Paragraphs 7.19 and 7.20 in Plan:MK.
MKCC Highways	108		2.22 – Whilst we may “not expect Build to Rent schemes to come forward in Zones 3-5” there is no guarantee of this. Zone 3 is relatively accessible, and it is quite possible that BTR schemes will come forward. A parking standard needs to be provided, even if it reverts to the standard for non-BTR C3 dwellings.	Noted and agreed.

MKCC Highways	109		<p>2.23 – this also relates to para 1.21 / 1.27. We have repeatedly resisted developments involving parking on surrounding streets. Retaining these paragraphs gives a green light to applicants to underprovide on-site parking and rely on surrounding streets.</p> <p>Parking in streets may theoretically be acceptable but it leads to inappropriate and dangerous parking as well as often preventing access to driveways and to business premises (e.g., HGVs). It can also obstruct emergency access and access for service vehicles.</p> <p>These paragraphs should be removed / amended to make it clear that parking is only acceptable in properly laid out bays and/or nearby car parks. The Lambeth methodology is not appropriate, is often poorly applied and has been rejected several times in MK.</p>	See response to comment 100.
MKCC Highways	110		<p>We are concerned that the 1:6 space ratio cited in relation to car club parking does not reflect the evidence base and therefore be inappropriate. The appropriate amount of car club spaces within a development that has a reduced level of parking should instead be determined on a case-by-case basis.</p>	Noted and agreed.
MKCC Highways	111		<p>2.25 – the bullets refer to on-street parking and, as per paragraphs 1.21, 1.27 and 2.23, this needs to be better explained. Parking in marked out bays or car parks is acceptable, general kerbside parking is not</p>	As in the response to comment 100, kerbside parking may be considered within transport assessments.
MKCC Highways	112		<p>3.1 – this statement needs improvement; high quality (not “good”) is essential (not “important”) to enable (not “encourage”) more people to cycle in preference to other modes. Cycling improves health and wellbeing, reduces pollution and is a highly sustainable mode of transport. Provision of cycling infrastructure and facilities can also assist with reducing traffic congestion and car parking demand.</p>	Noted and agreed.

MKCC Highways	113		3.2 – reference to other design documents should also be made here. LTN 1/20 is only one limited reference. These (and others) are worth mentioning: Chapter 8 of the LCDS (LCDS Chapter 8 Cycle Parking (tfl.gov.uk)), Standards for Public Cycle Parking (Cycle Parking Standard - Bicycle Association), Cambridge Cycle Parking Guide (CycleParkingGuide_split.qxp (cambridge.gov.uk)).	Noted and agreed.
MKCC Highways	114		3.3 – whilst LTN 1/20 is the most relevant document to quote, it does not necessarily represent the full range of cycling requirements. There is no mention of bikes with trailers or recumbent bikes.	Noted and references added.
MKCC Highways	115		3.5 – this wording needs clarification. Facilities “will also be sought” in addition to what? Other references to facilities mention shower and changing facilities, not “storing clothes”. The wording should be consistent across the document. Facilities for cyclists are essential, not important. Facilities should include showers, changing facilities and storage for clothes and cycling equipment. Each mention in the document and the tables should include all 3 elements.	Noted and agreed.
MKCC Highways	116		4.3 – given that the RDG is being reviewed it would be better to limit the ‘precedence’ of the parking standards to non-residential developments. Given earlier comments about the length of the document, this section could simply refer to the RDG and NDG etc. rather than reproduce them / conflict with them / be superseded by them (as per 4.10).	Noted and agreed.
MKCC Highways	117		Figure 1 has already been referred to above and the two pictures should be removed. Examples of facilities that could be shown are provided at the end of these comments. Figure 1 should be relocated to Section 6.	Noted. We have provided updated examples of best practice cycle parking and merged section 6 into section 3, so that all cycle parking guidance is in one place.

MKCC Highways	118		6.1 – using the phrase “long-term storage” is potentially confusing. This is referring to long-term parking (not storage) and this should be explained as parking required for more than 2-3 hours and overnight parking. Short-term / casual parking for visitors is for stays of up to 2-3 hours.	Noted and agreed.
MKCC Highways	119		6.3 – better guidance should be provided on the location of short-term and long-term parking in the same way that it is provided in LCDS Chapter 8 (e.g., para 8.3.1). Paragraphs 6.1 to 6.3 would be much improved with a definition both types of parking: Short-term cycle parking – 0 to 2-3 hours. Should be covered and located close to building entrances (within 15m) and in public areas where natural surveillance can take place. Can be in the form of Sheffield type stands or similar secure fixings. Long-term cycle parking – 2-3 hours or more. Should be in a secure and covered area or compound or provided internally. For dwellings, parking in a shed or garage is acceptable, for apartments parking should preferably be provided within the apartment block but can be provided in bespoke structures. Parking for non-residential uses may be located further from building entrances but should still be where natural surveillance is provided.	Noted and agreed.
MKCC Highways	120		6.4 – this section needs strengthening and examples providing; see the Cambridge guide and other documents referred to above. For clarity it is suggested the PTW provision and guidance is given in its own, separate section, not in with guidance on space sizes. Now that EVs are dealt with elsewhere, the “other vehicles” in Section 7 is only PTWs.	As above, cycle parking design guidance has been relocated to Section 3 and changes made to wording. The PTW guidance has also been given its own section.
MKCC Highways	121		7.12 – this is a repeat of 7.11	Noted, paragraph deleted.

MKCC Highways	122		<p>Appendix B – Car Clubs</p> <p>1 – includes note (1) but this is not explained.</p> <p>8 – consideration should be ‘given’ not “had”. Includes notes (3) and (4) but these are not explained.</p> <p>10 – who will enforce this? Need to clarify that MKCC can only enforce on the Public Highway or with a parking order on private land. This would need discussions with the parking team.</p>	Noted and agreed. We have clarified that responsibility for parking enforcement falls to the site owner and/or operator, as agreed between those two parties.
MKCC Highways	123	Appendix C	As stated earlier, this section is very long, very detailed and quite technical. Is it possible to simply direct people to the original source of this information?	Noted. This section has been amended to reduce length and signpost the relevant evidence base document.
MKCC Highways	124	Appendix C	29 – this refers to a “parking assessment and plan” being required as part of planning applications where new parking is provided. However, they are also required where changes of use are being applied for, which does not necessarily involve new parking.	Noted and agreed.
MKCC Highways	125	Appendix C	34 – enforcement needs clarification as above (Para 10 Appx B).	See response to comment 122.