RESPONSE TO CONSULTATION ON THE COUNCIL'S "SPD3 Parking Standards and Design" DOCUMENT

Section 11.1.1 states that "This section provides guidance on the detailed interpretation of the cycle parking standards".
However, the level of cycle parking provision shown in Appendix 1 (pages 27 to 34) makes no mention of the level of provision required for either "short stay" or "long stay" cycle parking provision. In fact all it requires developers to provide is a certain number of parking spaces.

We understand that due to the very wide variety of applications covered under same land use categories, rather than specify in the standards a split between staff and visitor, this will be considered on an application specific basis by the development control staff since the appropriate split could be quite different for different types of development.

The 1st problem is that as the Parking Standards (appendix 1) state no requirement for the more expensive Long Stay cycle parking, developers will understandably try to opt for "cheaper" short stay parking to save costs.

Secondly, the lack of any stated long stay provision, and the fact that this will be decided on a case by case basis suggests that the Planning Officers have no idea of what provision will be required, or how this will be decided.

The main reason for creating a set of parking standards is so that all parties involved are clear on what provision will be required.
However, the current parking standards will lead to a totally confusing situation, with developers not knowing what provision is required whilst trying to reduce costs by providing as little (if any) long-stay provision as possible, and with council officers "guessing" what level of provision is required.

This totally confusing situation is a serious flaw in the Council's Cycle Parking Standards (appendix 1), and the Council need to demonstrate how this problem can be rectified as soon as possible.

The following lists comments on specific sections of the "SPD3 Parking Standards and Design" guidance, with any suggested amendments highlighted in black, along with the reason for the amendment:

Section 11.1.1	Original Text	The cycle parking standards are designed to ensure the provision of a minimum level of cycle parking facilities in association with new developments and changes of use. These are minimum standards and the Council encourages a higher level of provision wherever possible and appropriate. This section provides guidance on the detailed interpretation of the cycle parking standards.

		Further information on the provision of cycle parking can be found in the Greater Manchester Cycle Parking Guidance produced by the Association of Greater Manchester Authorities.
	Amendment	The cycle parking standards are designed to ensure the provision of a minimum level of cycle parking facilities in association with new developments and changes of use. These are minimum standards and the Council encourages a higher level of provision wherever possible and appropriate. This section provides guidance on the detailed interpretation of the cycle parking standards. Further information on the provision of cycle parking can be found in the Greater Manchester Cycle Parking Guidance produced by the Association of Greater Manchester Authorities. **In addition, the Greater Manchester Police have produced the *"Design for Security – Cycle Parking Guidance"* document. The advice in this document is consistent with the principles of *"Secured by Design"* and *"CPTED (Crime Prevention Through Environmental Design".* Developers who adhere to these guidelines and level of parking for developments can achieve the prestigious "Secured By Design" award. The Council will actively encourage developers achieve this level of provision in all new development and change of use applications.**
	Reason	The GMP standards are consistent with National Best Practice, and are of a substantially higher standard (particularly in relation to the level and type of provision required), and developers should be encouraged to achieve this award. The GMP standards also have the full support of the Council's Cycle Forum.
Section 11.1.2	Original Text	Cycle parking should be close to building entrances; ideally closer than equivalent car parking facilities, otherwise cyclists will use other, more convenient, forms of street furniture;
	Amendment	Cycle parking should be close to building entrances **(no more than 30 metres away)**; ideally closer than equivalent car parking facilities, otherwise cyclists will use other, more convenient, forms of street furniture;
	Reason	This addition is compliant with the GMP "*Design for Security – Cycle Parking Guidance"*
Section 11.1.2	Additional Statement	**In residential schemes, cycle parking should be at least equally accessible as car parking.**
	Reason	This addition is compliant with the GMP "*Design for Security – Cycle Parking Guidance"*
Section 11.1.2	Original Text	Locations of cycle parking should avoid conflict with pedestrians, particularly the visually impaired.
	Amendment	Locations of cycle parking should avoid conflict with pedestrians, particularly the visually impaired, **and**

		protected from motor vehicle movement;
	Reason	There is frequently nothing to protect cycle from vehicles where cycle parking is located within car parks (e.g. Urmston multi-storey car park), leading to the possibility of cars bumping into parked bicycles.
Section 11.1.2	Original Text	Appropriate cycle parking signing is required.
	Amendment	Appropriate **and clearly visible** cycle parking signing is required, **showing the location, direction and quantity**.
	Reason	To assist cyclist in finding the location of cycle parking facilities.
Section 11.1.3	Original Text	The designs of different types of bicycle are taken into account. Bicycles can vary significantly in dimensions and some may have additional features, which may prevent them from using certain types of stand. A good example is that of mud guards, which make it difficult or impossible to use some types of vertical or semi-vertical stands. Such stand types should be avoided for this reason, or implemented in conjunction with other stand types at the same location;
	Amendment	The designs of different types of bicycle are taken into account. Bicycles can vary significantly in dimensions and some may have additional features, which may prevent them from using certain types of stand. A good example is that of mud guards, which make it difficult or impossible to use some types of vertical or semi-vertical stands. Such stand types **and vertical lockers** should be avoided for this reason, or implemented in conjunction with other stand types at the same location;
	Reason	Vertical lockers are also impossible to use for bicycles with mudguards, and also require the user to lift the bicycle, and should therefore not to be allowed.
Section 11.1.4	Original Text	Cycle parking facilities that only allow the front or back wheel to be secured will not be permitted at developments in Trafford. These stands offer a greatly reduced level of security (since a thief can easily steal the main body of the bicycle leaving the wheel secured to the cycle parking device), do not support the bike frame sufficiently, and can damage bicycle wheels (examples are pictured below).
	Amendment	Cycle parking facilities that only allow the front or back wheel to be secured will not be permitted at developments in Trafford. These stands offer a greatly reduced level of security (since a thief can easily steal the main body of the bicycle leaving the wheel secured to the cycle parking device), do not support the bike frame sufficiently, and can damage bicycle wheels (examples are pictured below). **Additionally, "Vertical Cycle Lockers" will not be permitted at developments in Trafford. These lockers require the bicycle to be lifted, are impossible to use by bicycles with mudguards, and are frequently too**

		small for larger commuting bicycles (such unusable facilities are installed at several Metrolink stations within Trafford).
	Reason	As mentioned in above in section 11.1.3, these facilities are largely unusable. Additionally the GMPTE have also now agreed that these will no longer be installed at Metrolink stations due to their unusability.
Section 11.2.4	Original Text	Sheffield stands are usually placed side to side (as opposed to end to end) for maximum space efficiency, and in this case should be spaced at 1.0m intervals to allow sufficient space for two bicycles to use each stand. Where the stand is less than 1.8m long, the stand should be located at least 650mm from a wall/fence to allow sufficient space for the bicycle wheel to overhang the stand, enabling the A-frame of the bicycle to be secured to the stand. In certain locations, it may be necessary to place the stands end to end, in which case the mid points of the stands should be placed 2.5m apart.
	Query	**The underlined statement above states that "where stands are less than 1.8m long", however, paragraph 11.2.5 states that stands should only be between 0.7m and 1.0m in length. Therefore stands should not be 1.8m long. Additionally, regardless of the length of cycle stand, there should be at least 650mm gap from the wall/fence.**
Section 11.2.6	Original Text	Many variations on the standard Sheffield stand are available, offering aesthetic alternatives. Most provide equally good security. We generally recommend a stainless steel finish as this lasts better than other alternatives, which can require regular maintenance. However, alternative variants may be appropriate in particular locations.
	Amendment	Many variations on the standard Sheffield stand are available, offering aesthetic alternatives. Most provide equally good security. We generally recommend a stainless steel finish as this lasts better than other alternatives, which can require regular maintenance. However, alternative variants may be appropriate in particular locations, **however, any variations should be approved by the council's cycling officer (in consultation with the cycle forum).**
	Reason	To ensure that any variants are acceptable for cyclists.
Section 11.2.7	New Section	**If the stand is fixed to the surface using base plates, 2 security bolts passing through each base plate are required. Otherwise, stands should have 'below ground' fixings, into a concrete foundation (300mm x 300mm x 300mm).**
	Reason	This addition is compliant with the GMP "*Design for Security – Cycle Parking Guidance"*

Section 11.3.3	Original Text	For open access long stay cycle parking, we recommend covered Sheffield stands of the type shown in Figure 7. This provides a good compromise of good security and weather protection whilst maintaining ease of access.
	Amendment	For open access long stay cycle parking, we recommend covered Sheffield stands of the type shown in Figure 7. This provides a good compromise of good security and weather protection whilst maintaining ease of access. **The same amount of sufficient space between covered Sheffield stands (1.0m) and between the surrounding Perspex/fence/wall (6.5m) should be provided, as recommended in section 11.2.4.**
	Reason	Figure 7 of the document appears to be taken at the Trafford Centre, and these stands are placed too close to the Perspex cover to allow the frame / wheel to be secured properly. This is a common problem (another example is the secure cycle compound behind Urmston police station).
	Original Text	Individual cycle lockers allowing storage of bicycles and equipment such as helmets. Cycle lockers can be either vertical (Figure 10) or horizontal (Figure 11). Such installations offer maximum security but each can be restrictive in terms of accessibility and ease of use. For this reason, it is recommended that wherever lockers are used, some Sheffield stands are also provided for use by those who cannot access the lockers.
	Amendment	Individual **horizontal cycle lockers (Figure 11) allow** storage of bicycles and equipment such as helmets. Such installations offer maximum security but each can be restrictive in terms of accessibility and ease of use. For this reason, it is recommended that wherever lockers are used, some Sheffield stands are also provided for use by those who cannot access the lockers. **Vertical Cycle lockers (Figure 10) are not to be used, as they require the bike to be lifted, are unusable for bikes with mudguards, and are generally too small for larger commuting bikes.**
	Reason	As mentioned previously, vertical cycle lockers are impossible to use by some bicycles.
11.3.6	New Section	**Horizontal Cycle Lockers should be of the following minimum dimensions (Length 2.0m / width 0.7 m / height 1.3 m) to enable larger commuting bicycles to use cycle lockers.**
	Reason	The cycle lockers at Metrolink stations in Trafford are to small (length, width and height) to allow larger commuting bicycles to fit into them (see GMCC's Useless Cycle Parking document). Minimum dimension will ensure larger than mountain / racing bikes can still use cycle lockers.