

Representations

Name / Organisation	Summary of Comments	City Council Response
Overall summary:-	<p>24 responses including :-</p> <ul style="list-style-type: none"> ▪ 3 requests for meetings - University of Leicester, NCP & Leicestershire Asian Business Association ▪ 3 elected members Cllrs Kitterick, Grant & Porter ▪ 2 site owners – former ABC cinema & Cumberland Street ▪ Planning and Development Control Committee 18th January 2011 ▪ Castle Ward Community Meeting 20th January 2011 ▪ The County Council, Leicestershire Police; Leicester Civic Society; Pick Everard; DMU; Cinema DeLux; Theatres Trust. 	See below
NCP 1	<p>NCP as the largest parking provider is willing to work with the Council to improve parking in Leicester and to identify potential sites and appropriate working arrangements. On- street parking has not been addressed Night time economy has not been addressed. Targets for quality should have been set to raise standards. Need a stronger line on taking enforcement action against all illegal car parks. Strengthen references to Walking Audits. Better pedestrian signage to car parks is required. NCP would be happy to discuss a framework linking successful enforcement action with improvements in lighting and security in NCP car parks. Meeting held on 18th January 2011. NCP hadn't appreciated that the SPD was part of a future wider parking strategy, so a lot of initial concerns were addressed by that. They are very keen on regular continued dialogue with LCC and to be involved with the future citywide parking strategy.</p>	<p>The future City Wide Parking Strategy will be able to address on street parking and night time economy. The reference to this will be strengthened in section 1.0 Aims of the SPD Setting targets for the quality of existing car parks would not be realistic or enforceable as most are in private ownership. Strengthen references to Walking Audits in 6.0 and 3.2c. Pedestrian signage was updated as part of the Streets and Spaces investment and a review of the variable message signing system is underway. Enforcement action can only be successfully taken where there is a clear case. A meeting with NCP has been held.</p>
NATURAL ENGLAND 2	No comment. It is unlikely to have any significant effects upon the wider natural environment.	None required.
LEICESTER CIVIC SOCIETY 3	SPD is very useful in appreciating scale of current car parking in the City. But disagree with the conclusion that there is a shortage in both southern areas, because there is only a minus number of spaces in	The most reliable and complete set of data that is currently available has been used. The document will be reviewed in 5 years time, so only the growth shown in

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	<p>south east and this is minor. Using figures in RSS and assuming zero impact of LTP is flawed. The conclusion should be that there is no need for any expansion of car parking provision. This should be reflected in LTP3.</p>	<p>approved 5 year housing supplies has been used. The modal shift from the 2001 census was used because we do not yet have more up to date city wide figures. No changes proposed.</p>
<p>LABA Leicestershire Asian Business Association 4</p>	<p>Request for meeting with LABA board and members. Meeting held on 4th February 2011. Previous parking policies were anti-enterprise, inconsistent and lacked a long term strategy. The economic impact of traffic warden policing regimes isn't considered. The City Council should be proportionate in its support of voluntary sector development verses private sector development, Cultural Quarters being an example of bad or no impact assessment. The importance of economic wellbeing and ability to attract shopping and visitors to areas like the Belgrave, Highfields and secondary shopping centres needs consideration. Any move towards city centre parking levy regimes, should be subject to full consultation and impact assessment. LABA can play their part in promoting best practice.</p>	<p>On street parking and enforcement are not covered by this SPD. The future City Wide Parking Strategy will be able to address on street parking.</p> <p>Ways in which LABA and the business community could engage in the next study were discussed, including using SABRAS radio.</p> <p>No changes proposed.</p>
<p>Cllr Patrick Kitterick 5</p>	<p>Need copy of document and at the very least we should have an item at a Ward Community Meeting.</p>	<p>Agreed; attended Castle Community Ward Meeting 20th January 2011. See below.</p>
<p>CLLR. ROSS GRANT Conservative Group Leader 6</p>	<p>Looking at the evidence used for this strategy there is no mention of tickets issued by Vinci staff on behalf of the Council. Can you confirm if this was used.</p>	<p>No it was not used because on street parking spaces are not covered by this SPD. The future City Wide Parking Strategy will be able to address on street parking. No changes proposed.</p>
<p>PICK EVERARD Alastair Hamilton 7</p>	<p>Appendix 3 - Car park charges do not consider deals between car park operators and local businesses for use of the car park at a cheaper rate. The percentage occupancy figures may therefore be slightly distorted .</p> <p>Appendix 4 - It is suggested here that other sites in addition to Birstall will be considered for the provision of further park and ride facilities, but LTP3 consultations state that due to budget constraints, there will be no new facilities other than at Birstall and instead the emphasis will be on making the best use of the park</p>	<p>The deals between car park operators and local businesses are not available to the City Council, so cannot be investigated.</p> <p>The statement on page 42 relating to the future provision of park and ride facilities is taken from the adopted Core Strategy</p> <p>Additional park and ride facilities are still a medium to longer term strategy of the</p>

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	<p>and ride facilities that we already have. Will LTP3 and this parking strategy be consistent with each other?</p> <p>There is nothing in the document about car park pricing strategy to support the use of alternative modes of transport whilst, at the same time, balancing the needs of people to drive into the city and maintaining the vitality of the city centre by not deterring visitors from travelling in or new incoming business.</p>	<p>LTP3, so the two documents are compatible.</p> <p>The majority of the City's car parks are not owned or controlled by the City Council therefore a pricing strategy is outside the Council's remit.</p> <p>No changes proposed.</p>
THE COAL AUTHORITY 8	<p>Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.</p>	<p>None required.</p>
NEETA KACHHELA 9	<p>General parking queries about parking in Loading Bays and on Single Yellow lines.</p>	<p>These specific parking queries are not covered by this SPD,</p> <p>No changes proposed.</p>
P. SIMPSON 10	<p>The car parking is adequate in Leicester City Centre only busy at xmas time. The park and ride at Enderby is an absolute waste of money for anybody to use, why travel down M1?</p>	<p>Comments noted.</p> <p>No changes proposed.</p>
LYNDA McLEAN 11	<p>If you are trying to encourage people not to use cars, please take account of the needs of disabled people unable to use a bus and walk. Scooters need to be accessible from where the buses stop, or buses able to accommodate them.</p>	<p>Comments noted.</p> <p>No changes proposed.</p>
LEICESTERSHIRE COUNTY COUNCIL Sophie Davies 12	<p>The document is broadly welcomed as up to date evidence. Support for increasing numbers of people walking, cycling, and travelling by bus to the City Centre.</p> <p>The role that parking provision plays and ease of access to it, needs to be recognised as supporting the sub-regional retail and leisure economy. Must recognise those for whom travel by car is the only option, e.g. from more rural/remote parts of the County, and ensure that adequate parking provision is available for future demand, or we may risk losing out to competing destinations, which would not only be bad for the sub-regional economy but which could also result in people travelling longer distances by car (with associated congestion and pollution consequences).</p> <p>The legibility of access to car parking is important. In many cases spaces are available within a relatively short travel distance both by car and on foot, but people drive around within one area without</p>	<p>It is recognised that parking is required to support visitors to the City and is vital in supporting the Leicester and Leicestershire sub-regional retail and leisure economy. The existing car parking capacity is adequate for this.</p> <p>The pedestrian signage was updated as part of the Council's recent Streets and Spaces investment and a review of the variable message signing system is being undertaken.</p> <p>Enforcement action can only be successfully taken where there is a clear case. The criteria in section 7 help clarify</p>

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	<p>going to another where there are spaces available. It is important that both good signing and direct and understandable routes exist for both vehicular and pedestrian access to car parking. Practical enforcement action, of unlawful Public Surface Level Car Parks is necessary for the parking strategy to succeed.</p>	<p>the information that will be required.</p> <p>No changes proposed.</p>
<p>CUMBERLAND STREET CAR PARK Insight planning Mark Flood 13</p>	<p>My client is broadly supportive of the aims of the SPD as set out at paragraph 1.0. However, my client is concerned as to the clarity of the document in a particular respect.</p> <p>The document does not make clear how the sites shown on Map 2 relate to the capacity calculation at Appendix 12. One assumes that all of the car parks shown on Map 2 represent the baseline for the application of the parking strategy set out at 6.0, i.e. anything proposed above and beyond them would be resisted, however, that interpretation is not explicit.</p> <p>If it is the case that Cumberland Street has been excluded from the baseline, my client objects to that exclusion.</p>	<p>This site is shown on map 2 p14, as a private surface car parking site. Appendix 12 in table 6b on p 64, for the NW, lists on a site by site basis the names of all the contract, authorised public surface level and multi storey sites that have been included. Private capacity is included as a total in the second line of the summary table.</p> <p>The Cumberland Street Car Park is included in that private figure, as it only has consent for private use, not public use. No changes proposed.</p>
<p>DMU De Montfort University Steven Hatherley 14</p>	<p>In general the University supports the main principles of the Strategy. However, there are a number of specific concerns:-</p> <p>1. On page 6 in the 'Criteria for Additional Future Parking' section the reference to '<i>strong</i>' business case is superfluous and should be deleted and a reference to 'Travel Plan' added in Appendix 1 as being a suitable document capable of justifying a Business Case.</p> <p>2. The criteria for new parking provision on page 7 are far too prescriptive for the following reasons:-a) In Appendix 9.2 the questions used to help define a 'High Quality surface level car park are not sufficiently clear. We suggest that a definition of 'High Quality' is included in Appendix 1.</p> <p>b) Appendix 11 requires that wiring and charging points are installed in all new car parks for between 5% and 25% of spaces and to prioritise use of these spaces. This proportion is far too high and should remove the need for charging points as an automatic condition. Whilst the policy refers to 'Low Emission Vehicles' the</p>	<p>Section 6 on page 27, in 'Criteria for Additional Future Parking' makes clear that a <i>strong</i> business case, is needed to provide adequate justification.</p> <p>Not all users have a 'Travel Plan' and it is not a suitable document for justifying a Business Case, but the SPD states that additional parking should be "in line with any travel plans".</p> <p>Quality is a very subjective subject and is affected by a large number of factors. Different ways can be used to improve quality.</p> <p>Recent changes to Government transport policy require electric charging points to be included within new development. It is not considered that the measures in Appendix</p>

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	<p>criteria relate solely to electric battery powered vehicles rather than including low emission petrol/diesel powered cars which would not require any charging points. This requires clarification.</p> <p>c) The policy states that new car parking should make provision for public use. The University operates barrier controlled procedures in many of its car parks and without this security would be compromised. It is totally impractical in a city centre location to make all car parks available for public use.</p> <p>The University manages evening and weekend use of its main car park by prior agreement with Leicester Tigers and Leicester City FC to accommodate the overspill of supporters but this arrangement would not work at other University controlled locations for various reasons. This should read <i>‘Make provision for public use where appropriate and feasible’</i>.</p> <p>d) The closing statement saying ‘Applications which cannot meet these criteria will be recommended for refusal’ is unworkable. This should be amended to read ‘Applications which do not meet most of these criteria will be recommended for refusal’.</p> <p>3. We agree with the statement on page 18 relating to Education but would prefer to see ‘Campus Rationalisation’ added to the final sentence i.e. that it will be supported as a justifiable reason for applications being made.</p> <p>4. We disagree with the calculation to determine Future Spare capacity. The Councils formula assumes the use of current and proposed park and ride sites at full capacity. Current use of these facilities is significantly below full A reduced percentage of the available spaces at these sites should be applied and the figures should be adjusted accordingly.</p>	<p>11 will be excessively expensive to install.</p> <p>Suggested change is :- Appendix 11 p 61, at end of v) add: _ “other low emission vehicles” after electric vehicles</p> <p>The criteria in section 6.0 which relate to making provision for public use only relates to new freestanding car parks, not existing car parks. PPG13 encourages the use of shared car parking particularly in centres.</p> <p>The closing statement says ‘Applications which cannot meet these criteria will be LIKELY TO BE recommended for refusal’.</p> <p>Park and Ride sites are not the only car parks where capacity is not fully used currently. It is necessary to include all the City’s car parking capacity in the calculations in Appendix 12, even if it is not currently used, otherwise this would result in a 50% underestimation of existing parking capacity.</p> <p>No further changes suggested.</p>
<p>SHOWCASE CINEMA DE LUX</p>	<p>We require reasonably priced easy access parking for cinema patrons to encourage them to return to the City Centre at night and</p>	<p>Comments noted.</p>

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<p>National Amusements 15</p>	<p>at the weekends and likewise for our staff due to our late night finishes after the last buses have left.</p>	<p>No changes proposed.</p>
<p>UNIVERSITY OF LEICESTER Agent BDP 16</p>	<p>The University of Leicester is just outside of the boundary of the SPD, but the representation highlights the valuable role of the University in the context of the successful operation and sustainable growth of the City Centre and the consequent parking issues that arise as a result.</p> <p>i) Demand for parking</p> <ul style="list-style-type: none"> • The University experiences high demand for car parking spaces both on a weekday basis from staff and visitors and at evenings and weekends for Open Day visitors, public events and part-time learners. • The SPD recognises the University of Leicester as an area of major growth and a major parking destination, but there is little opportunity for expansion within the University estate in terms of the aspirations for development and growth of the University campus. But it is possible that some of this demand may be met in part by parking provided within two of the identified focus areas of the SPD (south west and south east). <p>ii) Travel Plan</p> <ul style="list-style-type: none"> • The University Travel Plan places aims to reduce the dependence on single occupancy vehicles, but without adequate alternative public travel provision the parking situation will become more challenging, which is likely to impact adversely on the recruitment and retention of staff and students. • The success and growth of the University will be inhibited by their inability to meet daily parking demands and in particular the peaks caused by regular Open Days and public events, even with the expected decline in single occupancy vehicles. <p>iii) Supply of Parking Spaces</p> <ul style="list-style-type: none"> • The University, as part of the travel plan, has various planned changes to its current parking facilities, some of which may be of benefit to meet city centre demand in the south of the City Centre area relevant to the proposed SPD. <p>At the same time, some of the parking demands of the University are met in this area of the SPD. This demonstrates the interconnections between the University and defined City Centre</p>	<p>The high demand for car parking spaces at the University is recognised by its inclusion in Map 4 on p19 “Major Car Parking Origins and Destinations”.</p> <p>The University Travel Plan also includes a wider range of measures which will be agreed with the University each time that it is updated and adjusted accordingly.</p> <p>The City Council welcomes the planned changes to the University’s current parking facilities, which may be of benefit to meet city centre demand in the south of the City Centre area relevant to the proposed SPD.</p> <p>The next piece of work is identified in the</p>

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	<p>parking area. The University would welcome collaborative working with the Council in this regard.</p> <p>iv) City Wide Parking Strategy it is assumed that a wider reaching Parking Strategy within a SPD is planned for the future, within which the University will be given greater consideration. The University would welcome engagement with the Council on the parking demand and supply associated with the implementation of the future estates strategy of the University and how this will remain consistent with and assist in the successful implementation of this SPD and any future planning policy guidance.</p>	<p>SPD as being the broader City Wide Parking Strategy (see last bullet point of section 1.0, p8), within which the University will be given appropriate consideration. This will include the revision of the Parking Standards.</p> <p>A meeting has now been offered to the University.</p> <p>No changes suggested.</p>
<p>LEICESTERSHIRE POLICE Architectural Liaison Officer; Michael Lambert 17</p>	<p>1. The overall objectives of the document need to be more obvious. The appendices capture the strategic considerations.</p> <p>2. There are other issues that a City centre parking strategy might want to cover, e.g.</p> <ul style="list-style-type: none"> - the importance and role of car parking to major stakeholders and how they manage this, how this impacts commuting and other parking demands. -The role of other parking e.g. on the street or Secured Cycle parking. - Relationship to car parking standards and any emerging issues— e.g. too much parking in close to City residential schemes. - Integrated car park management and public information. <p>A statement on the focus of the SPD might explain why these matters don't feature in a City Centre Car Parking Strategy.</p> <p>The police might have added insight on local crime matters, the role of the Police accredited Park Mark scheme in design or indeed operational, safety and security issues e.g. in managing sporting events in the South West of the centre.</p> <p>3] It might be helpful if the document gave further consideration to some of the issues it identifies eg</p> <p>-How will major new employment development impact the operation of the station and its car park and how can future in commuting of 593 parking journeys and a predicted shortfall in parking supply be reconciled with this?</p>	<p>The objectives are clearly set out in section 1.0 “Aims of the SPD”.</p> <p>The importance of car parking to stakeholders has been well recognised. A consultation workshop held in October 2010 followed individual meetings with stakeholders. Their comments are included in the SWOT analysis on p12 and the SPD Consultation Statement, online.</p> <p>The role of on street parking is clearly set out in appendix 6, p44.</p> <p>The next piece of work will be the future City Wide Parking Strategy, including revision of the Parking Standards.</p> <p>Any information on local crime patterns and the role of the Park Mark scheme would be welcomed.</p> <p>The SPD has considered future growth, including new employment development in the context of the impact on all the car parks (not just on the station car park) and by ensuring that adequate car parking capacity is provided for future growth (p69-71). The predicted shortfall in parking supply is reconciled by the conclusion (p27) that more parking should be</p>

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	<p>-Why is spare capacity at Enderby Park and Ride attributed to parking capacity in the north west of the City? In a similar vein should this capacity be considered in relation to sporting events?</p> <p>- Pricing - are there any economic issues around pricing eg who uses different types of parking?</p>	<p>provided in the southern areas. Spare parking capacity at Enderby Park and Ride is attributed to parking capacity in the NW of the City, because of the route the commuter is most likely to take into the city centre Diagram 4 summarises primary users of car parks. It was not possible to interview individual drivers. The average cost of parking for each area is shown in the tables in p39/40. Prices are also discussed in the individual area specific conclusions in section 5 (p21-24). Parking choice isn't simply driven by price. No changes suggested.</p>
<p>FORMER ABC CINEMA Trustees of GS Fashions Pension Fund; By Marrons Solicitors Mr Chris May 18</p>	<p>The Trustees own the site referred to as “<i>Site of former ABC Cinema</i>”. These representations relate to two separate points: 1. The Current Status of the Site The SPD at Map 7 on page 30 shows the Site to be wholly ‘Temporary Approved’. Whilst part of the Site was granted a temporary consent at appeal a large proportion of the Site has the benefit of a Certificate of Lawful Use reference 20081972. Those spaces should be included within the ‘Permanent Approved’ figures of the SPD. The “2 Star Rating” was given prior to improvement works to the car park including re-surfacing of the Site in tarmac and the installation of ‘pay and display’ machines. The Star Rating should be increased accordingly to be “4 Star”. 2. The Parking Strategy for Future Requirements It is considered that the Strategy for the North West and North East Areas identified in the SPD is unduly restrictive. It should be amended to read: “<i>Based on the evidence above, no additional new car parking should normally be approved in these areas</i>” The SPD should make specific reference to normally allowing the renewal of car parking sites with temporary approval. There are additional factors of relevance to an application to renew a temporary consent.</p>	<p>The Site is incorrectly coloured on Map 7 p30. Amend colour of NE part of “Site of former ABC Cinema” from yellow to green on map 7 p 30. The spaces will be added to list of “Authorised Public Surface level spaces” and the list of sites and numbers of spaces will be amended in :- p23, section 5.4 p25, NE table 3 p64, NE all tables in 6b,appendix 12 The star rating will be amended to 2.5 in the table in appendix 7 p 48. The SPD provides a clear indication of intent, by using “should not”. This will not prevent any planning application from being determined on its merits.</p>

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	<p>The following criteria should be identified under a new heading called 'All renewal car parking applications should also:'</p> <ul style="list-style-type: none"> • Establish that the renewal of the temporary permission will not prejudice the regeneration of the site; • Demonstrate how the renewal of the temporary permission will ensure that the character and appearance of the locality is protected by the continuance of the car parking use, for example by demonstrating that the effect of refusal of a new temporary permission will result in dereliction of the site; • Take into account whether there are any sustainability benefits by the continuation of the car parking use; and • Take into account how the continuation of the use will not harm the objectives of the relevant policies of the Core Strategy. 	<p>There are car parks with temporary approval in all of the 4 zones. Based on the evidence collected for the SPD, different approaches are being applied to car parking in the different zones. It would therefore not reflect the evidenced based approach to change the SPD</p> <p>A new section is not required to deal with the renewal of temporary consents, but it is suggested that the SPD is amended to add at the end of section 6 on p 28 "Applications for the renewal of existing car parking should also consider the combined effect of all the criteria set out in section 7.2 p 29".</p>
<p>THE THEATRES TRUST Planning Policy Officer Rose Freeman 19</p>	<p>Thank you for including the walking audit Map 11 on page 57 showing the walking times from The Curve to various car parks.</p> <p>Theatres are unlike other forms of the night time economy –Where restrictive regimes do occur we would urge the planning authority to allow for special conditions that can provide free parking for theatre patrons.</p> <p>We would strongly urge any planning policies concerned with parking provision to consider the presence of theatres, cinemas and evening leisure facilities in the locality. By arrangement and if available, we suggest that supermarket car parks are a useful source of additional evening parking in town centres.</p>	<p>Since the majority of the City's car parks are not owned or controlled by the City Council. It is therefore outside the council's remit to provide free parking for theatre patrons and is up to the car park owners to set prices.</p> <p>The Council will consider the parking requirements of theatres, cinemas and evening leisure facilities in the next piece of work, the broader City Wide Parking Strategy (see last bullet point section 1.0).</p>
<p>CLLR NIGEL PORTER 20</p>	<p>Parking needs to be competitive and capable of responding to demand; otherwise Leicester will be at a disadvantage. Stringent parking controls and uncompetitive local parking charges unfairly penalise drivers and will discourage people from visiting Leicester City Centre to spend their money.</p> <p>The Transport Secretary recently said: "this Government recognises that cars are a lifeline for many people - and that by supporting the next generation of electric and ultra-low emission vehicles, it can enable sustainable green motoring to be a long-term part of Britain's future transport planning."</p>	<p>The main focus of this SPD is on commuter parking, and issues such as retail & leisure parking will be addressed by the future City Wide Car Parking Strategy.</p> <p>Enough car parking capacity exists within the City Centre to meet existing demand. This is especially true in the areas close the main shopping centres, where there is a significant over supply.</p>

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	<p>I do not believe that it is proper that a planning policy document should be used to prop up the Council's failed or proposed multi million pound park and ride schemes.</p> <p>As the economy improves empty sites in the City Centre will be regenerated and sustainable green motoring is seen as the future for transport in this Country. The proposed SPD is not the right parking policy document for Leicester at this time.</p>	<p>The document sets a requirement for low emission vehicle infrastructure to be contained with any new car parking.</p> <p>The Park and Ride service is an essential part of the City's sustainable transport system, as it set out in the Local Transport Plan. The aim of this SPD is not to provide evidence to support or otherwise the park and ride services around Leicester, but it is necessary to include the capacity at existing park & ride sites when working out the future capacity available, as they are aimed primarily at commuters. The council is satisfied that the evidence used supports the conclusions of the document.</p> <p>No changes proposed.</p>
<p>ONLINE SURVEY RESPONSE Anonymous 21</p>	<p>The priority should be to improve the flow of vehicles in and out together with cheaper parking.</p> <p>Don't agree with the aim to allow the removal of temporary and unsightly or outdated parking provision, because it is cheaper. I commute, if I had to park in full price car parks I may as well just stay at home. Parking is too expensive. Parking on the outskirts and catching a bus is fine if you don't have a child to drop off at school and be in work by a certain time.</p>	<p>The evidence collected shows that parking choice isn't simply driven by price, there are a number of other factors which affect choice, particularly car park location.</p> <p>Comments noted.</p> <p>No changes proposed.</p>
<p>ENGLISH HERITAGE (Statutory Env Consultee) 22</p>	<p>Thank you for consulting English Heritage. We welcome the inclusion of Appendix 9 on design quality of car parks. We have no further comments.</p>	<p>Pleased that Appendix 9 on the design quality of car parks is welcomed.</p>
<p>PLANNING COMMITTEE 19th January 2011 23</p>	<p>The analysis is welcomed. However, the document omits to consider residential amenity, this needs to be considered and the effect of new car parks on the Air Quality Management action plan needs to be added. The AQMP should be referred to and added as an appendix. Filbert Street surface site consent should not be renewed. It also has temporary consent so the colour is wrong on map 7, p 30.</p>	<p>Residential amenity is already considered in 3rd Bullet of criteria for new parking in section 6 p 27.</p> <p>Add reference to the Air Quality Management Area and Action Plan in section 6 and a copy of it in a new appendix 15.</p> <p>Amend colour of "Filbert Street" from red to yellow on map 7 p 30.</p>

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<p>Castle Community Ward Meeting 20th January 2011. 24</p>	<p>Leicester needs to have more innovative approaches to managing all types car parking with the city centre. The neighbourhood parking schemes needs to be addressed through in the SPD</p>	<p>Both comments noted and will be looked at as part of the future City Wide SPD. No changes proposed.</p>
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