



North Hertfordshire District Council
Supplementary Planning Document

Vehicle Parking at New Development

Consultation Representations

September 2011

Parking SPD Consultation

Consultee ID	Consultee	No	Type	Received date	Received by	TOC Item	Full representation text	Initial response
LDF/0339	Cllr Billing	26	Comment	29/06/2011	Email	Garages and Visitor/Unallocated Parking	Para 2.21 - There is a problem with having a lot of surface parking - that amount of tarmac despoils the visual aspect (not to mention surface water run off).	Document clear that parking will not detract from high quality landscape
LDF/0339	Cllr Billing	27	Comment	29/06/2011	Email	Electric Vehicle Charging Points	Yes, good to see this, but the para is very vague about what taking it into account would need to say to be acceptable. I suspect fine words would be all we get.	Section 3 expanded
LDF/0339	Cllr Billing	28	Comment	29/06/2011	Email	4. Residential Parking Standards for Class Use C3 - Dwelling Houses	<p>Para 4.4 - This won't work, I think. Of course developers will provide evidence that they will tell residents, but how will they or we hold residents to that in several years time, or indeed subsequent owners. There will be no way of getting developers then to pay for remedying the overflows onto surrounding streets. The final sentence of this para is unclear - too many negatives.</p> <p>Para 4.6 - 3rd bullet - like para 4.4 in my view this will lead to overflow onto surrounding streets, and it would be better to require the developer to provide space or money for car park spaces off site.</p>	Depends on local capacity and may not want to lose development opportunity, developer will be required to meet costs of any changes to local CPZ if applicable as detailed in 1.13.
LDF/0339	Cllr Billing	29	Comment	29/06/2011	Email	Table 4.1	Table 4.1 footnote 1 - "very small-scale conversion(s)" add up to an increasing parking problem, so when do we say "no" to a	This would be at DC officers

							reduction? Would a commuted sum be feasible?	discretion
LDF/0339	Cllr Billing	30	Comment	29/06/2011	Email	Parking Standards Class Use B - Table 5.2	What benchmark standards?	Amended – HCC benchmark standards
LDF/0339	Cllr Billing	31	Comment	29/06/2011	Email	Parking Standards Class Use D - Table 5.4	Why 1 space per FT staff, in schools, colleges etc when we are trying to reduce staff coming to work in cars; why is the need for travel plans omitted here?	Role of HCC who have specific school travel plan programme
LDF/0339	Cllr Billing	32	Comment	29/06/2011	Email	7. Travel Plans	<p>Para 7.1 - what are "significant new developments" in the last sentence? Does this mean residential?</p> <p>Para 7.3 - needs also a requirement for the means to be stated for monitoring the effectiveness of the plan in operation. I suspect we have too many travel plans which are no more than pieces of paper to get planning permission. Appendix 4 simply asks the question about monitoring and review. How can this be strengthened?</p>	Additional text included. However monitoring and review of plans are integral to any robust travel plan.
LDF/0342	Royston Town Council	130	Comment	04/08/2011	Email	Policy	Members welcome the recognition of inadequate minimum parking standards which has lead to on-street parking (para 1.4)	Noted
LDF/0342	Royston Town Council	131	Comment	04/08/2011	Email	North Hertfordshire District Council Parking Strategy	Members welcome proposals in para's 1.10 and 1.12	Noted
LDF/0342	Royston Town Council	132	Comment	04/08/2011	Email	Car Ownership Levels	Disappointed to see 2001 evidence used. Table 2.1 Last two columns Car or vans 2001 /1991 not clear what it means	As stated 2011 census data not currently available
LDF/0342	Royston Town Council	133	Comment	04/08/2011	Email	Royston	Para 2.10 Royston, no mention of introduction of 'Free after 3.30pm' paid for by Royston & District Area Committee or 'Free after 3pm' paid for by Royston First Bid Co which has had a positive impact of increased footfall and trade after 3pm	Not relevant to this SPD

							<p>in Royston. Royston's has limited off street free parking spaces compared to other towns. Members are concerned that the parking maps on NHDC web-site do not show all of the car-parking area at the Town Hall. Why?</p>	
LDF/0342	Royston Town Council	134	Comment	04/08/2011	Email	Garages and Visitor/Unallocated Parking	Members welcome the proposed increase in garage size to 7.0m x 3.0m and the increase from 0.25 to 0.5 per dwelling for visitor parking (para 2.19) Owners of properties should be deterred from converting garages to living accommodation and must ensure replacement car-parking areas are provided as an alternative to on street parking.	Noted, difficult to enforce
LDF/0342	Royston Town Council	135	Comment	04/08/2011	Email	Wider Evidence	More parking consideration required for cul-de-sacs and flats	Need officer response?
LDF/0342	Royston Town Council	136	Comment	04/08/2011	Email	3. Design and Layout of Parking Spaces	Minimum standard size of parking spaces not defined	Depends on style of parking hence referred to specific design manuals
LDF/0342	Royston Town Council	137	Comment	04/08/2011	Email	4. Residential Parking Standards for Class Use C3 - Dwelling Houses	Minimum parking standards too low, Table 4.1 in conflict with statement 1.4 para in that minimum number of car-parking spaces will be reduced. Town centre public car-parks need to be kept and not re-developed to enable town centre area parking standards to be maintained.	N/R to this guidance
LDF/0342	Royston Town Council	138	Comment	04/08/2011	Email	Parking Standards Class Use A - Table 5.1	A levy should be introduced on out of town retail shops providing free parking to help offset the costs of inner town parking to give fair competition	This is not possible within the scope of the SPD. It is also doubtful whether it can be delivered via legislation that allows the

								Workplace Parking Levy and, if so, this would be a County Council matter
LDF/0342	Royston Town Council	139	Comment	04/08/2011	Email	6. Transport Assessments	Adequate turning circles for public transport should be retained 6.5 Needs to be monitored	Already included
LDF/0342	Royston Town Council	140	Comment	04/08/2011	Email	7. Travel Plans	Appendix 4 Health issues to include walking disabilities	Amended
LDF/0342	Royston Town Council	141	Comment	04/08/2011	Email	8. Section 106 Contributions and Community Infrastructure Levy	Welcome C.I.L Levy on out of town retail shops with free car-parking see question 6 5.1 Ring fence to subsidise inner town parking	This is not possible within the scope of the SPD. It is also doubtful whether it can be delivered via legislation that allows the Workplace Parking Levy and, if so, this would be a County Council matter
LDF/7104	Homes & Communities Agency (Herts Team)	1	Support	04/08/2011	Email	Draft Vehicle Parking at New Development SPD	The Homes and Communities Agency (HCA) has reviewed the SPD and can confirm that we support the principle of the document. The SPD clearly explains why the Council is undertaking a review of parking standards across the district and it explains the rationale for the proposed new parking standards.	Noted
LDF/7105	Great Ashby Community Centre	1	Comment	30/06/2011	Web	Great Ashby	I am the manager of the Gt Ashby Community Centre and have worked here since it opened in 2003. I travel in and out of GA daily, regularly visit many homes and also deliver the	noted

						<p>local newsletter 'Gasbag' around the whole of GA so I'm very familiar with all the roads. I am pleased that notice has been taken of the fact that people will not reduce car ownership in response to inadequate parking and schemes to encourage walking and use of public transport - they will still buy cars and then FIGHT!</p> <p>I don't live in GA but until very recently we were a 4 car, now 3 car family (we have our 21 year old twins still at home)and parking is just about workable where we are in Stevenage. Unlike some years ago, today's young people tend to buy a car as soon as they pass their driving test and this isn't likely to change. They are also quite likely to live at their parents home longer for financial reasons. This estate is full of young families whose children will be grown up in a short while - what's going to happen then?! Moving is not always an option for people.</p> <p>In my work as community centre manager I have experienced first hand and have heard so many people complain about the absurdly and dangerously narrow streets in some areas of GA, cars clogging up the streets due to lack of residential parking spaces (and don't always seem to like parking in the specially built forecourts in front of their houses),garages being too small even for a Peugeot 206, grass verges being ruined by parking, cars being keyed when they have been parked half on the 'pavement' etc. The police say car parking is the major source of complaints they have to deal with in GA. People blame 'greedy developers', and the council in giving them permission, for wanting to squash as many houses into as little space as possible then running off leaving the problems behind, although I do point out there has been a govt strategy to try an encourage less car use which has contributed too.</p> <p>I regularly give a lift to a disabled lady in on a road which is</p>	
--	--	--	--	--	--	--	--

							<p>very narrow with very limited parking (or even driving) space - she lives in a 5 bedroom house with a double length garage used for storage and appliances and space for 1 car next to the house. I have to park right up on the pavement outside her house in order to enable any other car to squeeze past as there are invariably cars parked on the other side of the road. I once had a fire brigade flyer put under my windscreen wiper telling me I had parked inconsiderately as the vehicle couldn't get past!! (I think they had gone through the streets on a test run.)</p> <p>All these issues need to be taken into consideration for future developments if an area is to be conducive to building communities populated by real people and not idealistic unworkable models.</p> <p>Great Ashby itself is a lovely looking estate and many people are happy here, but instead of encouraging a eco-minded climate-caring community I'm afraid the reality is the issue of car parking and road width causes great frustration and conflict - not the best ingredients for a 'vibrant place to live work and prosper!' Dot Smith</p>	
LDF/7108	Hitchin Forum - Transport & Planning Group	5	SUPP	08/08/2011	Email	Parking Standards Class Use A - Table 5.1	<p>We are in agreement with keeping a standard for maximum provision at non-residential development to encourage more sustainable transport modes and reduce parking land use. Consistent use of maximum standards may become increasingly important with the current government's emphasis on local establishment of parking standards as indicated in the draft National Planning Policy Framework (paragraph 93). We have no comments to make on the numbers in Table 5.1, which are outside our area of expertise, although we assume the second line for retail food stores should relate to 500 to 2500 m2.</p>	Amended
LDF/7108	Hitchin Forum	3	COM	08/08/2011	Email	2. North	A standard of 1.5 spaces per dwelling in retirement	

	- Transport & Planning Group					Hertfordshire Context and Evidence Base	<p>developments seems appropriate as many residents continue to own cars into their seventies and eighties, and there is additional demand from carers visiting the infirm, often several times daily.</p> <p>The evidence base appears to be rather limited at the moment, drawing heavily on the experience at Great Ashby. It would be worthwhile to have a statement in the SPD to the effect that the standard will be reviewed on, say, a five year cycle as experience develops, and that surveys will be carried out on a range of new developments to inform policy.</p>	Additional local evidence base now complete
LDF/7108	Hitchin Forum - Transport & Planning Group	1	COM	08/08/2011	Email	Policy	<p>We would agree that limiting parking at residential developments is unlikely to reduce car usage and can cause problems for residents. Specifying minimum standards for parking appears to be a reasonable approach, although there must be flexibility in the application of the standard to reflect different conditions at different sites.</p>	Noted
LDF/7108	Hitchin Forum - Transport & Planning Group	4	COM	08/08/2011	Email	Hitchin	<p>The Hitchin section (2.6 to 2.8) should give some guidance on the implications of the issues listed in 2.7 for standards to be applied in the town. These issues, and remedies, should be central to any new policy.</p> <p>2.6 should be reworded as it is ambiguous and leaves the impression that developers may be able to avoid responsibility for parking and rely on public provision in some cases.</p>	Amended
LDF/7108	Hitchin Forum - Transport & Planning Group	2	COM	08/08/2011	Email	Table 4.1	<p>The residential parking standards in Table 4.1 appear reasonable. We assume that the visitor/unallocated provision is in addition to the amount of parking specified elsewhere in the table. For example, retirement developments would need 1 space per dwelling plus 0.5 unallocated spaces per dwelling, a total of 1.5 spaces per dwelling.</p> <p>A standard of 1.5 spaces per dwelling in retirement developments seems appropriate as many residents continue to own cars into their seventies and eighties, and there is</p>	Noted

							additional demand from carers visiting the infirm, often several times daily.	
LDF/7110	HCC	1	Comment	08/08/2011	Email	1. Introduction and Policy Context	Policy context, para 1.7 The new Local Transport Plan for Hertfordshire has a Parking Policy (see 3.15 Parking in Volume 2 of the new LTP), which could be usefully mentioned / referred to within the overall policy context. http://www.hertsdirect.org/services/transtreets/transplan/ltp/LTP3/ltp3docs/	Amended – additional info on LTP3 included
LDF/7110	HCC	2	Comment	08/08/2011	Email	Electric Vehicle Charging Points	Para 3.15 The Government has recently announced its strategy for Electric Vehicles which strongly promotes the provision of charging infrastructure in homes as the primary location at which owners will charge their EV. We strongly suggest this section is updated in line with the measures set out in the national strategy: http://www.dft.gov.uk/publications/plug-in-vehicle-infrastructure-strategy	Amended – section updated
LDF/7110	HCC	3	Comment	08/08/2011	Email	Appendix 1 - Policy Background	Appendix 1, Local Policy Again, worth referring to the LTP3 policy on car parking here. Change the date for revised parking guidance from the county from 'early 2012' to 'the future'	Amended
LDF/7110	HCC	4	Comment	08/08/2011	Email	Appendix 4 - Travel Plan Checklist	Appendix 4 The checklist could be updated to include some further documents from the DfT, potentially including those on delivering travel plans through the planning system at http://www2.dft.gov.uk/pgr/sustainable/travelplans/tpp/	Amended
LDF/7111	Hertfordshire Constabulary - Architectural Li	1	Comment	08/08/2011	Web	Draft Vehicle Parking at New Development SPD	I would echo the fact that Hertfordshire has a higher than national level of multiple car ownership and this must be accepted and catered for. 30+ years of dealing with motor vehicles and their owner has	

						<p>shown me that if anything is true, it is that social housing needs more parking space than open market.</p> <p>Q 2.2 Car Ownership Levels Experience tells me to supply less parking for social housing would be a mistake. Short term car ownership is prevalent and may not show up in official figures but will showup parked on kerbs and verges!</p> <p>Q 2.4 The use of garages and visitor/unallocated parking Para 2.19- I agree with the proposal to raise the allocation for visitor parking to .5 per dwelling.</p> <p>Para 2.20- Security must be given a higher status. Blocks of garages are frequently targeted and their doors forced. The block will quickly become derelict as car owner will not risk leaving vehicles where they are not happy regarding security. Certified quality doors must be a minimum requirement.</p> <p>Para 2.21- Good natural surveillance must be incorporated in all designs.</p> <p>Para 2.25- It is good to see the use of common sense regarding the abolition of maximum standards.</p> <p>Para 3.2- There are some other very useful guides that could be referenced-</p> <p>Manual for Streets 2 (a companion guide) 2010.</p> <p>English Partnerships- Car Parking-What works where.</p>	<p>Blocks of garages are discouraged and additional info on security included</p> <p>Amended</p>
--	--	--	--	--	--	---	--

						<p>Mention could also be made of the police accredited Safer Parking Scheme and its standards.</p> <p>Para 3.3- The DDA has been replaced with the Equality Act 2010 as of 1st October 2010.</p> <p>Q 4: Residential Parking Stds for C3 Dwelling</p> <p>I would like to see an additional .5 spaces for 3 & 4 bedroom houses.</p> <p>There appears to be a proliferation of conversion of offices above shops to flats. Provision for parking will become an issue and should be looked at.</p>	Amended
LDF/7112	Wilcock	1	Comment	08/08/2011	Email	<p>Draft Vehicle Parking at New Development SPD</p> <p>The draft SPD needs to be considered in the wider context of the Central; Government guidance that is emerging and this must be referenced within the introduction to the document.</p> <p>In his ministerial statement on 23rd March 2011 Greg Clark (minister of State for Decentralisation) said that the Government's clear expectation is that the answer to development should whenever possible be "yes", except where this would compromise the key sustainable development principles set out in national policy. He went on to say that when deciding whether to grant planning consent local planning authorities should support and facilitate housing.</p> <p>The draft national Planning Policy Framework was published in July 2011. This reflects the statements made by Greg Clark. In paragraph 14 it is stated that there should be a presumption in favour of sustainable development through all decision making. This is developed further in paragraph 18 when it is stated that the default answer to a development proposal</p>	Noted

						<p>should be "yes", except where the development would compromise key sustainability principles. It goes on to say that planning policies and decisions should take into account local circumstances and make the effective use of land.</p> <p>In the NPPF at paragraph 20 it is stated that local plans should be consistent with the objectives of the rational framework. In paragraph 27 it goes on to say that the Local Plan should be based on adequate, up to date and relevant evidence about economic, social and environmental characteristics and prospects.</p> <p>In paragraph 93 the statement is made that when setting local standards for residential and non-residential development that local authorities should take into account a number of factors including accessibility type and mix of development, local car ownership and the need to reduce the use of high emission vehicles.</p> <p>These emerging policies need to be reflected in both how the guidance has been produced and need to be referred in the Introduction and Policy background.</p> <p>It is acknowledged that this Draft SPD has been produced in line with PPG 13 published in January 2011 which stated the parking at residential developments should be set at minimum rather than maximum standards.</p> <p>The emerging Central Government guidance means that when setting parking standards for all forms of development that there to be a local evidence base on which any decisions are made. Setting car parking standards as minimum for residential developments must be done within the context of achieving both the best use of land and a good design for new</p>	
--	--	--	--	--	--	--	--

							<p>developments.</p> <p>Parking must also be set at a level where there is no risk that it will reduce residential dwelling density to such a level that potential housing sites become economically unviable and are therefore not progressed. If the minimum parking standards are set too high and there is no flexibility to reflect the accessibility of sites then there is a risk of this position being realised.</p>	
LDF/7112	Wilcock	2	Comment	08/08/2011	Email	<p>North Hertfordshire District Council Parking Strategy</p>	<p>The principle of introducing minimum parking standards for residential development is not disputed. However, the level set for any such parking standards must be based on local evidence and must allow potential sites to be developed to make the best use of land and to be economically viable.</p> <p>It has been stated in paragraph 1.11 that "some residual parking on existing streets may be acceptable on existing streets but where it is considered to add pressure to existing residents parking provision, new development will be required to provide for its own parking".</p> <p>There is nothing fundamentally wrong with the design of new residential areas including some allowance for on-street parking where this would not cause a safety problem or lead to problems for emergency access.</p>	<p>Noted – document does not rule out on street residual parking but requires that no such parking should be acceptable in areas where it is likely to generate or exacerbate problems</p>
LDF/7112	Wilcock	3	Comment	08/08/2011	Email	<p>2. North Hertfordshire Context and Evidence Base</p>	<p>The wider review of the four towns referred in paragraph 2.2 needs to be completed and published prior to finalising the SPD so that full details are clear. This wider review needs to take into account residential parking demand in the context of car ownership including considering different tenures, types and parking provision of developments and have a</p>	<p>Town wide parking review programme underway, additional local evidence base</p>

							<p>comprehensive review of all of the issues whether good or bad. One of the issues that should be considered is the disadvantages of requiring what could be an over provision of parking spaces.</p> <p>While the above research is underway as assessment of the use of garages across the District could be undertaken to test whether the wider research from elsewhere referred to in paragraph 2.16 of the draft SPD is reflected in North Hertfordshire.</p> <p>At the current time the evidence base for the SPD is insufficient and in some areas the statements made in relation to residential parking demands are diametrically opposed to the actual evidence. This is explored fully in the section below.</p>	<p>plus additional information provided here included in document</p>
LDF/7112	Wilcock	4	Comment	08/08/2011	Email	Car Ownership Levels	<p>No figure is presented in the SPD for potential growth in car ownership from 2011 to 2011. If it is accepted that the level of growth is the same as that from 1991 to 2001 (around 11%), then car ownership would have increased to 1.44 per residential unit.</p> <p>In paragraph 2.5, the draft SPD states that "there is little evidence when looking at census data that levels of car ownership for general needs social rented housing are significantly lower than that for market or intermediate housing". The 2001 census shows the following car ownership for tenure type for whole of North Hertfordshire District which shows a marked difference between tenure and car ownership that is in line with the variation highlights in the DCLG research:-</p> <p>All households - 1.31 vehicles</p>	<p>Amended – additional local evidence on car ownership and growth included</p>

						<p>Owned - 1.52 vehicles Council rent - 0.72 vehicles Other rented - 0.61 vehicles Private rented - 1.16 vehicles</p> <p>Taking Royston as one of the key towns within the district the same levels of variation can also be seen:- All households - 1.37 vehicles Owned - 1.5 vehicles Council rent - 0.78 vehicles Other rented - 0.66 vehicles Private rented - 1.07 vehicles</p> <p>The draft SPD states that the DCLG suggests a minimum of 0.5 vehicles difference between owner occupied households and social rented which from our research within Royston seems to be reasonable. this part of the draft SPD clearly needs to be amended in the light of car ownership data from the national census. The statements made in the draft SPD is contrary to the available evidence and is therefore not consistent with NPPF.</p> <p>In addition, further detailed studies are required at each of the four major centres in North Herts (including Royston) to understand the impact across the towns and suggest a parking standard on the level of accessibility and public transport in each town.</p> <p>Further research is required into particular residential areas and the potential impact of minimum car parking standards in relation to impact on the highway network particularly in town centres where car parking demand is high, but there are pressures on the existing availability of car parks. This will</p>	
--	--	--	--	--	--	---	--

							<p>cause overcrowding which may spill onto local residential streets which in turn may affect local residential parking provision.</p> <p>Particularly as it is recognisable that dwelling types differ in larger towns compared to the majority of the more rural areas within North Herts.</p>	
LDF/7112	Wilcock	5	Comment	08/08/2011	Email	<p>Garages and Visitor/Unallocated Parking</p> <p>While some garages may not be used for car parking it must be recognised that it is still possible to park in all garages. No research has been undertaken into the use of garages across the District.</p> <p>The draft SPD in paragraph 2.15 states" additional factors such as the availability of on street parking". This not only ignores most of the advice on the previous pages which show that on street parking is limited and to be discouraged but suggests that in over half of all developments the level of on street parking is low enough that people do not need to park in a garage.</p> <p>Firstly, this demonstrates that on street parking is not as limited as has previously been suggested. Secondly, this shows that the previously North Herts maximum parking standards provided sufficient, in fact overly sufficient, parking spaces that meant households were not required to use the parking provided in the garage.</p> <p>Furthermore, it states that all garages must be 3.0m by 7m. A standard car parking bay is 2.4m x 4.8m, with a large saloon car being approximately 4.8m long and 1.6m wide. This suggests that a garage must be 2.2m longer and 0.6m wider than a standard parking space. and 2.2m longer and 1.4m wider than a large car.</p>	<p>Amended - Local research included</p> <p>The SPD requires that minimum standards of parking should be met alongside good quality design to balance parking with all other planning issues. If good design and all other relevant information suggests on-street parking will not be a problem then the SPD is flexible enough to allow this</p>	

							<p>As the purpose of a garage should be to park a car and provision for a cycle can be made elsewhere the size of garage required is considered to be excessive in terms of the length needed. A 6m long garage will accommodate both a large car and cycle, if required. The DfT's design guidance Manual for Streets states that a minimum garage size is 6m x 3m.</p> <p>Unallocated Parking In paragraph 2.19 it is stated that to take account of the fact that not all garages are used for parking that the requirement for visitor/unallocated parking should be increased from 0.25 to 0.5. There is no evidence to support this. This is contrary to the requirements of the emerging NPPF.</p> <p>DCLG research demonstrates that the average demand for visitor parking is 0.2 per unit and 0.5 per unit would be a significant increase in provision that is not supported by any evidence.</p>	<p>Benchmarking and local evidence suggests that current garage size is not appropriate for modern family vehicle. HCC suggests 6m by 3m, Essex 7m by 3m.</p> <p>The Local evidence suggests that insufficient visitor provision impacting on local roads, can be negotiated down if required for particular developments.</p>
LDF/7112	Wilcock	6	Comment	08/08/2011	Email	Wider Evidence	<p>There is no numerical data presented for the increase in parking standards for residential units in this section.</p>	<p>Data refers to accommodating increase in car ownership for duration of development and clearly identifies</p>

								growth from current levels.
LDF/7112	Wilcock	7	Comment	08/08/2011	Email	4. Residential Parking Standards for Class Use C3 - Dwelling Houses	<p>This clearly shows that the proposed minimum level of residential parking within the draft SPD would result in a significant over provision of parking.</p> <p>The emerging NPPF requires that local plan, which will include the draft SPD, are based on local evidence. This is clearly not the case in area of the draft SPD as it stands as it does not take account of local car ownership levels and there is not evidence for the proposed increase in visitor or unallocated parking.</p> <p>The draft SPD is also contrary to the principles of the emerging NPPF as it will not ensure that the best and most sustainable use of land is made, it could lead to residential sites that are dominated by provision for parked cars and could mean that identified residential sites become unviable as the need to meet the minimum parking standards means that the number of proposed units will need to be significantly reduced.</p> <p>The minimum standards within the daft SPD do not take account of the fact that in North Herts there is a broad range of car ownership. As included in the representation to question 2.2 there is variation between car ownership between tenures. If these figures are considered then this is more in line with the 2006 SPD and the 2011 draft would over provide parking.</p> <p>The minimum level of car parking should also take into account issues such as the implementation of a Travel Plan and any other sustainable transport contributions and these should be offset against the minimum level of car parking, in accordance with the draft national Planning Policy Framework</p>	<p>The document does not show this, it is based on local case studies of insufficient parking provision and takes into account future growth.</p> <p>Car ownership variances between tenures not supported by local evidence however amendment has been made to visitor provision to allow for this.</p>

						<p>and PPG13 which promote Travel Plans and any other sustainable measures that encourage modal shift.</p> <p>Paragraph 4.7 states that "consideration must still be given to how parking for residents and their visitors can be accommodated during both daytime and evening and that this is both practical and reasonable in use". This suggests that the local authority should apply a reasonable level of discretion and that the minimum parking standards should only be applied in some cases. this has to be the case as it is not possible to provide such a high level of parking and in some cases which will affect the financial viability of a sustainable development which should ultimately be promoted.</p> <p>As a final summary:- The proposed minimum residential parking standards are contrary to the emerging NPPF. There is no sound evidence basis for the proposed changes to the parking standards. While there is no objection raised to the adoption of minimum residential parking standards, those proposed would lead to a significant over provision of parking with the resulting issues of poorly designed sites that are dominated by needing to meet the requirements of the site or by low density developments that will either prove unviable or will not make the best use of land.</p> <p>Further work is needed to properly justify the proposed changes to parking standards to ensure that over provision is not made a requirement for new developments and the resulting issue do not occur.</p> <p>As the car ownership data is available on a District or town</p>	
--	--	--	--	--	--	---	--

							wide level, or even a ward level there is a case for variations in parking standards across the district. This should be linked to the accessibility of areas by other modes of transport and the proximity to local facilities.3	
LDF/7112	Wilcock	8	Comment	08/08/2011	Email	8. Section 106 Contributions and Community Infrastructure Levy	It should be noted that the new CIL suggests that contributions do not have to be directly related to the infrastructure needs arising from a specific development. This is again contrary to the emerging NPPF.	Noted
LDF/7113	McCarthy & Stone Retirement Lifestyles LTD	1	Comment	21/07/2011	WRT	4. Residential Parking Standards for Class Use C3 - Dwelling Houses	<p>The minimum standard of 1 space per unit for residents of retirement housing and 0.25 spaces for visitors is excessive. A recent survey of retirement housing showed that the peak demand for parking by residents, staff and visitors was less than 0.5 spaces per apartment. The parking requirements should be applied flexibly to reflect the specific supporting evidence that accompanies the application which may vary from site to site depending upon its location and accessibility. It is not helpful to have a standard which appears to be lumping retirement housing into the same bracket as general housing class C3.</p> <p>Setting aside the argument that this standard should be expressed as a maximum, a note should be added that this standard would be applied flexibly, based on the nature of the retirement development and any evidence that is submitted on the parking needs. This note should apply to all types of parking (car, cycle, PTW). McCarthy and Stone have unsurpassed experience in providing on-site car parking within its retirement housing developments. The Company's conclusions on this subject have been consistently persuasive with Local Planning and Highway Authorities and Planning Inspectors where car parking standards and ratios have been under consideration in development plans, planning applications and planning appeals. Retirement housing,</p>	<p>Comments taken on board and standard retained as 1 space per unit minimum with room for negotiation on case by case basis. Additional flexibility on visitor provision also provided.</p> <p>Accession maps included for developer information on local accessibility.</p>

						<p>because of its very nature and concept, is invariably located within reasonable walking distance of shops and other essential services and close to public transport facilities. In this context, it is relevant, of course, to consider Government Policy in terms of PPG13.</p> <p>Planning Policy Guidance Note 13 specifically advises local planning authorities to:</p> <p>(i) "not require developers to provide more spaces than they themselves wish, other than in exceptional circumstances which might include for example, where there are significant implications for road safety which cannot be resolved through the introduction or enforcement of on-street parking controls" (Paragraph 51).</p> <p>Parking need at Retirement Housing Developments</p> <p>There is no benefit to McCarty & Stone in under-supplying on-site car parking provision, as the Company will, quite simply, not be able to sell its apartments or maintain its high regard and reputation as the market leader in this specialised field of housing. At the very least the SPD should be amended to enable such a policy to be applied flexibly taking into account the supporting evidence of any planning submission or secondly the accessibility zones should be applied also to Retirement Housing to reflect the highly sustainable locations and lifestyle changes that such development promotes.</p> <p>The Company restricts the age of residents such that they must be 60 years of age, or over, except that where a resident over the age of 60 has a partner of 55 years of age or over, this partner may also occupy an apartment. This is normally controlled by a planning condition, although it is also a</p>	
--	--	--	--	--	--	--	--

						<p>standard clause in the resident's lease.</p> <p>The average age of entry to McCarthy and Stone retirement (sheltered) developments is 78, well above the minimum age restriction. It is believed that's this reflects the fact that, in the majority of cases, elderly people do not want or need the facilities provided by this form of housing until they are well into their 70s. This may well reflect that the increase in life expectancy is linked to the elderly remaining more independent for longer and therefore not requiring the facilities provided by this form of housing until later in life.</p> <p>Clearly as time passes, the average age residents in a development will tend to increase further, perhaps stabilising after many years. These age characteristics are important, when considering car ownership, as indicated in figure 1 below. This data was obtained from a substantial survey of retirement (sheltered) housing undertaken by Dr Allan Burns BSc Phd CEng MICE MIHT. It shows that, where one of the residents in an apartment is between 55 and 60 years of age, the car ownership rate is likely to be in the order of 80%, but this steadily declines to zero car ownership rate is likely to be in the order of 80% but this steadily declines to zero car ownership for residents over the age of 5. The graph shows this significant decline as the ages of residents increase.</p> <p>Figure 1. Car Ownership Levels by Age Group of Residents (see original for graph)</p> <p>Given the likely age profile of residents, very few, if any, would be in the youngest age group and the majority will be over the age of 75 and so will have a relatively low car ownership level. As indicated above, as the development becomes established, the average age of the residents increases.</p>	
--	--	--	--	--	--	---	--

						<p>Figure 1 suggests that this would result in a decline on car ownership, and this is supported by results from other studies. Consequently, car ownership levels, and the associated car parking requirements will tend to be highest in the early few years of the development, once all the apartments are sold.</p> <p>Car ownership and car parking demand will tend to fall over succeeding years. It has also been found in category II retirement(sheltered) housing that, of those residents who have given up car ownership, as the majority eventually will, some 18% did so in the same year that they entered retirement (sheltered) housing. The rate of giving up car ownership was also above average in the years immediately before and after entering this form of housing. This is illustrated in figure 2, below. This indicates that the decision to move into this form of housing may well represent a lifestyle change, which, for many, included the decision to give up the car.</p> <p>Figure 2 (see original for graph)</p> <p>A further factor influencing car ownership is the gender of the residents. Typically, 75% of residents are female. there is a tendency for women to have a lower car ownership than men and to give up car ownership at an earlier age. Indeed a report on the findings of the latest National Travel Survey indicates that "three quarters of women aged 80 and over live in households without a car". this applies to women in the community as a whole and those that have moved into retirement housing are likely to have an even lower car ownership level.</p> <p>Surveys have also shown the reasons why residents choose to enter retirement housing. The most frequently referred to reason was "security" with 53% of residents giving this</p>	
--	--	--	--	--	--	--	--

							reason. Other important reasons were "previous house/garden unsuitable" 43% "nearer to family" 35% "death of spouse" 27% "health reasons" 25% and "companionship" 24%. These reasons tend to sow the nature of the lifestyle change being sought and the need for security is very important in the design of the development.	
LDF/7113	McCarthy & Stone Retirement Lifestyles LTD	2	Comment	21/07/2011	WRT	5. Non-residential Parking Standards	In the same way that a maximum parking standard is being proposed for other class C uses such as C2 extra care, the retirement housing should likewise be subject of a maximum parking policy and considered in a similar flexible way.	Amended
LDF/7113	McCarthy & Stone Retirement Lifestyles LTD	3	Comment	21/07/2011	WRT	6. Transport Assessments	Given that the nature and characteristics of retirement housing has significantly less impacts than family housing in terms of parking and transportation implications the threshold for requiring a TA should be closer to 50 units when considering retirement housing schemes.	Amended
LDF/7113	McCarthy & Stone Retirement Lifestyles LTD	4	Comment	21/07/2011	WRT	7. Travel Plans	Given that the nature and characteristics of retirement housing has significantly less impacts than family housing in terms of parking and transportation implications the threshold for requiring a TA should be closer to 50 units when considering retirement housing schemes.	Amended
LDF/7113	McCarthy & Stone Retirement Lifestyles LTD	5	Comment	21/07/2011	WRT	8. Section 106 Contributions and Community Infrastructure Levy	<p>The timing of this draft guide ahead of the Infrastructure Levy (CIL) is unfortunate as it is not able to fully take into account the government's publication of the Community Infrastructure Levy Regulations 2010, which has changed the law in respect to planning obligations. Paragraph 122 (2) states;</p> <p>A planning obligation may only constitute a reason for granting planning permission for the development of the obligation is -</p> <ul style="list-style-type: none"> a. necessary to make the development acceptable in planning terms; b. directly related to the development; and c. fairly and reasonably related in scale and kind to the development. 	

							<p>As this is now law as opposed to previous policy guidance it means that any planning obligations have to be 'necessary' to make the consent lawful. Unfortunately, a large number of the infrastructure contributions set out currently in the SPG could be deemed as unnecessary, with many more not being calculated in a fair and reasonable way relating in scale and kind to the nature of a specific residential development for older people or indeed open market residential.</p> <p>Furthermore, the following Paragraph 123 limits the use of tariff style obligations to infrastructure to a maximum of 5 developments. It is questionable whether the SPG is still relevant and as such would be contrary to the Community Infrastructure Levy Regulations.</p> <p>The SPD should make it clear that until adoption of a fully scrutinised CIL generalised transportation contributions will not be sought for strategic highway, community and other desires.</p>	Amended
LDF/7113	McCarthy & Stone Retirement Lifestyles LTD	6	Objection	21/07/2011	WRT	Draft Vehicle Parking at New Development SPD	Overall therefore objection is raised to the form and detail of the proposed SPD which should make specific reference for the need for greater flexibility particularly with regards to specialised housing such as retirement housing. It is duly requested that the council takes these points in to consideration.	Parking standard for retirement dwellings amended in accordance with evidence provided
867	Hill/Royston Area Committee	2	Comment	08/08/2011	Email	1. Introduction and Policy Context	We welcome the opportunity for further input into the strategy (paragraph 1.1).	Noted
	Hill/Royston Area Committee	3	Comment	08/08/2011	Email	Policy	It is very positive that the Draft SPD addresses the issue of the inadequacy of the current minimum parking standards (paragraphs 1.4 and 1.5).	Noted

	Hill/Royston Area Committee	4	Comment	08/08/2011	Email	North Hertfordshire District Council Parking Strategy	<p>All the proposals in paragraphs 1.10 to 1.13 are very much welcomed. There are currently not enough spaces allocated on new developments. It is good that the proposals include working with developers and Hertfordshire County Council regarding overspill into surrounding streets (paragraph 1.12) as there is an existing issue regarding parking in residential roads.</p> <p>The CPZ scheme should be carefully monitored and reviewed if opened up to residents of new developments and this appears to be addressed in paragraph 1.14 and Policy 24.</p>	Noted
	Hill/Royston Area Committee	5	Comment	08/08/2011	Email	2. North Hertfordshire Context and Evidence Base	Agree.	Noted
	Hill/Royston Area Committee	6	Comment	08/08/2011	Email	Car Ownership Levels	We feel there has been a significant increase in car ownership levels since the 2001 Census and would stress that this must be reviewed, reflected and the policy amended when the new Census figures come out.	2011 census data not available
	Hill/Royston Area Committee	7	Comment	08/08/2011	Email	Royston	Agree, particularly with comments regarding Royston (paragraph 2.10) and Great Ashby (paragraph 2.12 - a recent example of a new development where the parking standards have not worked) and would welcome additional on-street parking in Royston Town Centre. Would emphasise that commuter parking does cause problems in many residential streets.	noted
	Hill/Royston Area Committee	8	Comment	08/08/2011	Email	Garages and Visitor/Unallocated Parking	<p>Garages need to be large enough to accommodate an average modern, family size vehicle and should be increased in size on new developments (paragraph 2.14).</p> <p>Careful consideration should be given for converting garages to living space, unless there is provision within the property, for additional parking, to discourage on-street parking.</p>	Noted

							<p>Agree with garages sized above 7.0 m x 3.0 m, only, being counted towards parking provision (paragraph 2.17).</p> <p>Agree with increasing visitor parking from 0.25 to 0.5 per dwelling and would support an even larger increase.</p>	
	Hill/Royston Area Committee Hill/Royston Area Committee	9	Comment	08/08/2011	Email	Wider Evidence	<p>Agree with many of the comments in 2.22 to 2.25. There is often 'inadequate parking' (paragraph 2.22) and there is often 'a lack of space for visitors or two car households' (paragraph 2.23). Future growth should certainly be allowed for in a new policy (paragraph 2.24).</p>	noted
	Hill/Royston Area Committee	10	Comment	08/08/2011	Email	3. Design and Layout of Parking Spaces	<p>Agree more consideration should be given to 'turning heads for ever larger service vehicles' (paragraph 3.1). Comments regarding drainage systems (paragraph 3.2) welcomed. It is imperative that 'sustainable drainage systems' are provided on new developments and 'permeable surfacing' (many areas suffer from flooding).</p>	Noted
	Hill/Royston Area Committee	11	Comment	08/08/2011	Email	4. Residential Parking Standards for Class Use C3 - Dwelling Houses	<p>Parking provision for one bedroom properties currently assumes only one car (or less in some urban areas). More attention should be given to the fact that many flats or one bedroom properties are occupied by two people with a car each. This should be factored in, together with visitor parking. Town Centre properties are often occupied by residents travelling out of the Town to work and not working in the Town, as often assumed.</p> <p>Consideration should be given to the type of development and increasing the number of car parking spaces within the area.</p> <p>Minimum car parking standards need to be increased.</p>	Factored in with additional visitor parking
	Hill/Royston	12	Comment	08/08/2011	Email	5. Non-	Allocation of spaces needs to be very carefully monitored and	Noted

	Area Committee					residential Parking Standards	reviewed regularly to ensure adequacy of spaces	
	Hill/Royston Area Committee	13	Comment	08/08/2011	Email	Parking Standards Class Use B - Table 5.2	Points noted. This should be regularly monitored, reviewed and amended, if appropriate.	Noted
	Hill/Royston Area Committee	14	Comment	08/08/2011	Email	6. Transport Assessments	Fully support Transport Assessments and welcome the concept of Design and Access statements. It is particularly good to see that parking is a key aspect of this (paragraph 6.4). There should be regular reviews and improvements put in place, where appropriate.	Noted
	Hill/Royston Area Committee	15	Comment	08/08/2011	Email	7. Travel Plans	Very positive.	Noted