ction	Date on which	Examination Do
	Action Completed	Reference No.
IHDC to propose amendments to Policy SP6 as follows:		
• Reconsider criterion (a) specifically in relation to the	MM028	
word 'comply' and whether the criterion ought to		
refer to the Transport Strategy and the Stevenage		
Mobility Strategy		
• Amend criterion (c) to include reference to	MM028 and	
neighbouring authorities	MM030	
• Amend criterion (d) to refer to seeking the earliest	MM028	
reasonable opportunity to implement sustainable		
travel infrastructure and to consider whether it is		
appropriate to apply criterion (d) to all sites rather		
than just strategic housing sites		
Reconsider criterion (e) in respect of parking	MM028	
standards		
HDC to propose amendments to Policy SP7 as follows:		
 amend criterion (a)(i) bullet 4 to 'mitigate adverse 	MM032	
impacts where appropriate' or similar		
• remove reference in criterion (b) to 'unless otherwise	MM032	
agreed with relevant providers' and add 'whichever is		
earliest'		
• reconsider criterion (f) and supporting text at para	MM032 and	
4.83 as main modification	MM034	
NHDC to produce note in order to justify proposed	25.05.2018	ED153
parking standards. Note to include reference to 2001	Enclosed as Appendix M16-1	
census data, the 2011 SPD, benchmarking, the		
correlation between car ownership and bedroom		
sizes, Great Ashby development as a case study and		
the link to paragraph 39 NPPF.		
• NHDC to consider cycle parking in note and whether		
different standards might be justified in different		

ED153 : NHDC Final response to Inspector's Actions Arising out of the Hearing Sessions

Matter 16 – Transport and Infrastructure		
Action locations for both cycles and cars.	Date on which Action Completed	Examination Doc Reference No.
 NHDC to amend paragraph 7.15 of the supporting text to Policy T2 to take account of fact that there are cycle standards proposed in the Plan itself 	MM121	
• NHDC to propose amendment to Policy T1 to take account of highway impact in addition to safety	MM119	

Appendix M16-1

ED153: NHDC Note on Parking standards

North Hertfordshire district Council Local Plan Examination Note to the Inspector

Car Parking and Cycle Standards

- 1.1 Note to the Inspector on the car parking and cycle standards for residential development in North Hertfordshire.
- 1.2 At the hearing session on Matter 16, the Inspector requested that North Hertfordshire District Council produce a note to justify the proposed residential parking and cycle standards as provided in Appendix 4 to the Plan (LP1) and to consider whether different standards might be justified in different locations for both cars and cycles.
- 1.3 This note:
 - describes the existing provision in the proposed submission Local Plan for parking standards for cars and cycles (Section2);
 - considers the evidence base to justify those residential car parking standards, including updating of the evidence base to consider 2011 census and benchmarking. Car parking for retirement housing is also considered, before drawing conclusions and the need to suggest proposed changes to the car parking standards (Section 3);
 - considers the cycle parking standards for residential and retirement housing and sets out proposed changes (Section4); and then
 - concludes with a proposed main modification to Policy T2 Parking, its supporting text and Appendix 4 of the Local Plan for the Inspectors consideration (Section 5).

2.0 Car Parking Standards (Residential) – Existing Provision

2.1 The residential parking standards in the proposed submission Local Plan are provided in <u>Appendix 4</u> to the Plan (LP1). These currently provide as follows:

"Appendix 4: Car Parking Standards

Residential Parking Standards

Class Use C3	Car Parking Standard	Minimum Cycle Parking Standard
1 bedroom	1 space per dwelling minimum	1 secure covered space per dwelling. None if
2+ bedrooms	2 spaces per dwelling minimum	garage or secure area provided within curtilage of dwelling

The above standard will also require visitor / unallocated parking as set out below to be added. Garages will be counted towards meeting the standards only if they are at least 7m x 3m measured internally. Reductions will be considered only in exceptional circumstances e.g. in town centres or other accessible locations with the availability of a

range of local services and good local sustainable transport options and for e.g. smallscale conversion of buildings for a small number of residential units in defined town centres

Class Use C3	Car Parking Standard	Minimum Cycle Parking Standard
Retirement developments (e.g. warden assisted independent living accommodation)	1 space per dwelling minimum	1 space per 8 units (visitors)
Visitor / unallocated	Between 0.25 and 0.75 spaces per dwelling (rounded up to nearest whole number) with the lower standard being applied where there are no garages in the schemes and the higher standard applied where every dwelling in the scheme is to be provided with a garage	If no garage or secure area is provided within curtilage of dwelling then 1 covered and secure space per dwelling in a communal area for residents plus 1 space per dwelling for visitors

L

For the above two standards, reductions in provision will be considered where:

- 1. Alternative publicly available off-street parking is available within 2 minutes' walk of the site;
- 2. Visitor parking arising from small-scale (i.e. infill) development can be accommodated on-street without compromising highway safety, the amenity of existing residents or the ability for businesses to operate; or
- 3. Relevant evidence is submitted by the applicant which supports a reduction in standard and considers existing and future car ownership and likely visitor demand."
- 2.2 More detail of the standards and their application and the background to the parking standards is provided in document TI14 'Vehicle Parking at New Development' Supplementary Planning Document (2011).

3.0 Consideration of Evidence Base to Justify Residential Car Parking Standards

- 3.1 In response to questions raised during the Matter 16 hearings, the Council has reviewed and updated its evidence base where necessary to justify the residential car parking standards.
- 3.2 The existing standards were derived from various sources, including Census 2001 car ownership data, information from existing developments, research and standards elsewhere, and a household survey, as set out in TI14. This information is still regarded as relevant. For example, the parking problems occurring in the Great Ashby residential estate

as a result of under provision of parking remain as noted in TI14, and there are ongoing complaints about on-street parking pressure elsewhere in the district. The 2011 Census data, which provides an update to the 2001 Census data, is considered below.

Census 2011 data

- 3.3 The Census 2011 dataset 'CT0103 Accommodation type by tenure type by rooms by car or van availability' has been reviewed to identify the car ownership levels within NHDC by number of rooms, tenure type and accommodation type.
- 3.4 There is also information available on estimates of growth in car ownership in NHDC, through the DfT national database TEMPRO. TEMPRO version 7.2¹ has been used to source appropriate changes in average car ownership per household for NHDC between 2011 and 2031. Based on analysis of the number of households and number of cars in the base and future years, the growth in average car ownership can be estimated, and was found to be 10% this is very close to the 11% predicted in paragraph 2.4 of TI14..
- 3.5 This growth rate has been applied to the average NHDC car ownership figures per size of dwelling, and the results are shown in Figure 1. This supports the conclusion that 1 bedroomed units require on average (rounded up) 1 parking space, while 2 bed roomed units and above require more than 1 parking space and is set at 2 parking spaces.

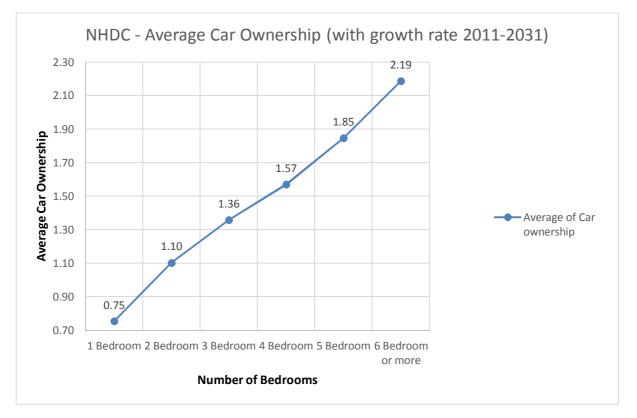


Figure 1: Average Car Ownership with growth 2011 to 2031

3.6 Figure 1 shows the estimated future average car ownership by bedrooms across NHDC. These averages include a wide range of dwelling types and locations, and clearly there will

¹ TEMPRO – refers to the DfT is the Trip End Model Presentation Program (TEMpro), software allows users to view travel forecasts from the National Trip End Model (NTEM) datasets.

be variation around these. The census also provides some information on the percentages of households by size that have three or more vehicles, as shown in Table 1 below. This shows that there are very low proportions (15%) of households with 5-bedrooms or less that have 3 or more cars; In the light of this, it is considered that the present standard is acceptable, particularly as it is a minimum.

Property size	Percentage of households having three or more cars
1 Bedroom	1%
2 Bedrooms	2%
3 Bedrooms	6%
4 Bedrooms	10%
5 Bedrooms	15%
6 or more bedrooms	26%

Table 1: 2011 Census percentage of households with three or more cars

- 3.7 Given that the census data are averages it is recommended that the policy permits some flexibility in the application of the standard in justified circumstances. This would depend on the accessibility of the development, the type, scale, mix and use of the development, the availability of and opportunities for public transport; proximity to other services; local car ownership levels; and on-street conditions to justify such variations. This would accord with national guidance and paragraph 39 of the NPPF.
- 3.8. It is also to be noted that the Council's residential car parking standards as set out in the Plan are minimums, and applicants can provide higher numbers of spaces.

Benchmarking

3.9 In addition to considering the 2011 Census Data, the Council has also undertaken a benchmarking exercise. The NHDC car parking standards for Use Class C3 residential developments have been compared to those in East Hertfordshire, Welwyn Hatfield and Stevenage in Table 2 below. There is reasonable variation between the approaches taken, with two (East Herts and Stevenage) having 'fixed' parking standard provision, and Welwyn Hatfield having a 'maximum' provision, compared to the 'minimum' in North Hertfordshire. The actual standard also differs depending on 'accessibility zone', which is a measure of the ease of access to key services (including GPs, schools, retail centres) by public transport or walking and cycling. This designation also applies in the North Hertfordshire 'Vehicle Parking at New Development' SPD [TI14]), and taking this into account, the North Hertfordshire standards for 1 and 2-bedroom units are reasonably similar to the other authorities. However, all three of the other authorities have specific standards for dwellings larger than 2 bedrooms, which may well be due to the fact that they do not use a minimum standard.

NORTH HERTFORDSHIRE DISTRICT COUNCIL LOCAL PLAN EXAMINATION ED153 MATTER 16

Table 2: Comparison of C3 residential parking standards with neighbouring authorities

District	Description	Car Parking Standards		Cycling Parking Standards
North Hertfordshire		Minimum car parking standards		1 secure covered space per dwelling. None if garage or secured area
Local Plan 2021-2031	1 bedroom	1 space per dwelling minimum		provided within curtilage of dwelling.
	2+ bedrooms	2 spaces per dwelling minimum 1 Space per dwelling minimum		
	Retirement developments			1 space per 8 dwellings (visitors)
East Hertfordshire		Fixed parking standards. Provision can vary according the accessibility zone location ²		1 long-term (I/t) space per unit if no garage or shed is provided
Source:	1-bedroom dwellings/studios	1.5 space per dwelling		
Draft Appendix to the District Plan	2-bedroom dwellings	2 spaces per dwelling 2.5 spaces per dwelling 3 spaces per dwelling 0.5 to 1 space per units		
concerning vehicle parking standards	3-bedroom dwellings			
	4 or more-bedroom dwellings			
	Sheltered housing for the elderly – warden control			1 short/term (s/t) space per 3 units; plus 1l/t space per 5 units
Welwyn Hatfield Source:	Bedsits	Zones 1 and 2 (maximum standards)	Elsewhere (maximum standards)	1 l/t space per unit if no garage or shed provided
Welwyn Hatfield District Plan Review	1-bedroom dwellings	0.75 spaces per bedsit	1.25 spaces per bedsit	
(2004)	2-bedroom dwellings	0.75 spaces per dwelling	1.25 spaces per dwelling	
	3-bedroom dwellings	1 space per dwelling	1.5 space per dwelling	
	4 or more-bedroom dwellings	1.5 spaces per dwelling	2.25 spaces per dwelling	
		2 spaces per dwelling	3 spaces per dwelling	
	i) Retirement dwellings – no warden control	1.5 spaces per unit including 0.25 visitor space		1 s/t space per 3 units
	ii) Sheltered dwellings – warden control	0.75 space per unit including 0.25 visitor space		1 l/t space per 5 units
Stevenage	1 bedroom	1 space per unit Fixed standards		1 l/t space per 1- bed unit if no garage
Source:	2 bedrooms	1.5 spaces per unit		2 l/t spaces per 2 bed and above unit if no garage or shed provided
Parking Provision Supplementary Planning	3 bedrooms	2 spaces per unit 2.5 spaces per unit		short-term provision 1 space per 40 units
Document (Adopted January 2012)	4+ bedrooms			
Cycling provision from Table 11.1 of Stevenage Cycling Strategy, May 2017.	Sheltered Housing for the elderly	0.5 to 1 spaces per unit		1 s/t space per 3 units plus 1 l/t space per 5 units

² Provision can vary depending on the accessibility zone of the new development. Level of car parking provision can be 25-100% (Zone 2), 50-100% (Zone 3), 75-100% (Zone 4) of the required provision.

Retirement housing

- 3.10 In this section of the note, the standards proposed to be applied to retirement housing are considered. There is no applicable census data in respect of retirement housing, and the standard in the SPD (TI14) was proposed based on local experience. Retirement housing can take a variety of forms, ranging from those catering for the 'just retired' where car ownership will be similar to 'normal' dwellings, or those catering for more elderly residents, where car ownership will be lower. The standard therefore requires some flexibility, which is provided for in the SPD.
- 3.11 The SPD (TI14 at para 4.6) states that 'the standard is a minimum of 1 space per dwelling, with room for negotiated reduction dependant on robust evidence put forward by the developer and the location of the development in reference to its position within the accessibility zones. This allows the standard to be applied more flexibly, varying from site to site, depending on its location and available parking and transport facilities nearby'.
- 3.12 The benchmarking information in Table 2 shows that different authorities have different standards, ranging from 0.5 to 1.5 spaces per unit, and that the NHDC standard of 1 per unit is within this range. Together with the flexibility referred to in the paragraph above, the standard is regarded as appropriate.

Conclusions

- 3.13 The analysis of Census 2011 data supports the basis of the current minimum standards in the Plan at Appendix 4, and benchmarking indicates that they are within the ranges of those used in adjacent authorities albeit there are differences in approach.
- 3.14 Regarding the question raised at the hearing session of whether larger dwellings should have higher parking standards, the SPD (TI14) states in para 4.3 that 'As the standards are minimum there are fewer divisions of the class with the presumption that developers will not wish to compromise housing density for increased parking provision. The standards for 3 or 4-bedroom dwellings are the same as 2+ bedrooms with a minimum of 2 spaces per dwelling.'
- 3.15 This is further supported by the analysis of the 2011 census data as discussed above, which shows that a very low proportion of households have more than 2 cars, and consequently the Council do not propose to introduce a new standard for larger dwellings.
- 3.16 Given that the census estimates are averages and there will be variation around these, some flexibility in the application of the minimum standard has also been added in the proposed modifications. This flexibility will depend on provision of suitable evidence considering the issues noted in paragraph 39 of the NPPF and other local factors such as on-street conditions in terms of available capacity as well as likely pedestrian and environmental impacts.

4.0 Cycle parking standards

4.1 The cycle parking standards for residential development are provided in <u>Appendix 4</u> to the Local Plan and are also set out in paragraph 2.1 of this note.

- 4.2 The standards proposed are considered appropriate and are in line with those in adjacent authorities as set out in Table 2 above, i.e. 1 space per dwelling where no garage or secure facility is provided within the curtilage of the dwelling.
- 4.3 An exception is the retirement dwelling cycle parking standard, where other Hertfordshire authorities have a standard of 1 space per 3 units (short-term/visitor) and 1 space per 5 units (long- term/residents), and it is proposed to amend the current standard to maintain consistency with adjoining authorities. See section 5. below and Appendix A attached to this note.

5.0 Proposed Main Modification to Policy T2, supporting text and Appendix 4.

- 5.1 Based on the above, Appendix A attached to this note contains the Main Modifications proposed to Policy T2, the supporting text and to Appendix 4 of the Local Plan. To summarise, these are:
 - to amend criterion 'a' and insert a new criterion at 'b' in response to the discussion at the Matter 16 hearing session in making Policy T2 more effective by referring to residential and non-residential parking standards and how these standards are applied; and to add a paragraph enabling some flexibility to the standards subject to various requirements which can be justified as part of the development proposal;
 - as set out in the NHDC Statement to Matter 16 (paragraph 29) the minor modification included to the text of Policy T2 criterion 'c' renumbered as criterion 'd' to emphasise the need for safe and functional parking design;
 - to include an amendment to the cycle parking required for retirement dwellings as set out in section 4 above from 1 space per 8 units to 1 space for residents per 5 units and 1 space for visitors per 3 units ;
 - to include text and layout changes to Appendix 4 for clarity purposes in light of representations made to the plan; and
 - to include various minor amendments to the supporting text at paragraph 7.15 to clarify reference to residential and cycle parking standards.

Appendix A: Proposed Modifications to Policy T2, supporting text and Appendix 4

(Note: proposed additional text is shown in **bold**. Text to be deleted is shown in the form of strike through)

Policy T2: Parking

Planning permission will be granted provided that: where:

- a. parking **for residential development** is provided in accordance with the minimum standards set out **in Appendix 4 of** this Plan;
- b. parking for non-residential development is provided having regard to the standards for non-residential development set out in the relevant Supplementary Planning Document;
- c. proposals have regard to relevant Supplementary Planning Documents, strategies or advice and;
- d. applicants clearly identify how they provide for all likely types of parking demand and demonstrate that parking will be safe and of a design and layout that will function satisfactorily.

Variations from these standards will only be considered where applicants can demonstrate that the accessibility, type, scale, mix and use of the development; the availability of and opportunities for public transport; local car ownership levels; and on-street conditions justify such variations.

- 7.10 Most development proposals generate demand for parking relating to different users be it for visitors, residents, employees or solely for operational purposes.
- 7.11 Parking is one tool that can be used to influence travel demand and mode of travel. Previous policies to influence car ownership based on maximum standards of parking provision at trip origin (residential parking) are acknowledged to be flawed. Experience in North Hertfordshire shows that insufficient parking provision in residential environments can have an adverse impact. Limiting parking availability at trip origins does not necessarily reduce car ownership and can displace vehicles onto the adjacent local highway network, diminishing the streetscape, causing increased levels of congestion, and potentially obstructing emergency vehicles.
- 7.12 It is now recognised and accepted that, in most locations, demand management through parking is most appropriate at the trip destination (for example commercial, leisure and retail parking). The need for greater parking control has developed in line with the growth of motorised traffic, particularly in the rise in ownership and use of private cars. The emphasis of sustainable transport is now placed on locating residential development where car use is less likely / and or necessary for many trips.
- 7.13 The main priority of this policy is, therefore, to seek to influence car use, through application and assessment of parking standards, promoting use of alternative

modes of transport and travel planning, as opposed to restricting car ownership. Many residents may have cars, which influence car ownership levels, but choose to travel sustainably for school or commuting purposes.

- 7.14 Car parking can also impact on the design quality and flood risk of development and as such, consideration should be given to this in accordance with Policy D1: Design and Sustainability.
- 7.15 Residential Parking standards for residential car and cycle parking are set out in Appendix 4 of this Plan. Parking provision in accordance with these standards will generally meet the day to day needs of the occupiers but without over provision. Relevant applications will be required to meet these standards. Recommended standards for other uses, and other types of parking, including cycle parking, are set out in supplementary guidance⁸⁶. This document also provides general guidance on issues such as design and layout.
- 7.16 Applications should have regard to this advice and other relevant plans and strategies including those produced by Hertfordshire County Council as the local highway authority and show how they have been taken into account in developing proposals. Advice will be regularly reviewed over the plan period to take account of changes in car ownership and travel patterns and mode share, national policy guidance and any other relevant matters.
- 7.17 The policy also introduces some flexibility in the application of the standards. Where development proposals seek to reduce the standard, applicants will be required to demonstrate justification for such variation based on the principles of the NPPF (paragraph 39) and taking into consideration impact on on-street conditions such as highway safety, available on-street capacity as well as likely pedestrian and environmental impacts.

⁸⁶ Vehicle Parking at New Development Supplementary Planning Document (NHDC, 2011)

Appendix 4: Car Parking Standards

Class Use C3	Car Parking Standard	Minimum Cycle Parking Standard
1 bedroom	1 space per dwelling minimum	1 secure covered space per dwelling. None if garage or
2+ bedrooms	2 spaces per dwelling minimum	secure area provided within curtilage of dwelling
Retirement developments (e.g. warden assisted independent living accommodation)	1 space per dwelling minimum	1 secure and covered space for residents per 5 units.

Residential Parking Standards

The above standard standards will also require visitor / unallocated parking as set out below to be added. Garages will be counted towards meeting the standards only if they are at least 7m x 3m measured internally. Reductions from these standards will only be considered where applicants can demonstrate that the accessibility, type, scale, mix and use of the development; the availability of and opportunities for public transport; local car ownership levels; and on-street conditions justify such variations. Reductions will be considered only in exceptional circumstances e.g. in town centres or other accessible locations with the availability of a range of local services and good local sustainable transport options and for e.g. small-scale conversion of buildings for a small number of residential units in defined town centres.

Class Use C3 **Car Parking Standard** Minimum Cycle Parking Standard **Retirement developments** 1 space per dwelling 1 space per 8 units (visitors) (e.g. warden assisted minimum independent living accommodation) Visitor / unallocated Between 0.25 and 0.75 For above C3 general spaces per dwelling housing - if no garage or (rounded up to nearest secure area is provided whole number) with the within curtilage of dwelling higher lower standard being then 1 covered and secure applied where there are no space per dwelling in a garages in the schemes and communal area for residents the lower higher standard plus 1 space per dwelling for applied where every visitors dwelling in the scheme is to

Visitor/Unallocated Parking

For the above two visitor and unallocated parking standards, reductions in provision will be considered where:

be provided with a garage

For C3 retirement

per 3 units

developments - 1 covered and secure visitor space

- 1. Alternative publicly available off-street parking is available within 2 minutes' walk of the site;
- 2. Visitor parking arising from small-scale (i.e. infill) development can be accommodated on-street without compromising highway safety, the amenity of existing residents or the ability for businesses to operate; or
- **3.** Relevant evidence is submitted by the applicant which supports a reduction in standard and considers existing and future car ownership and likely visitor **demand**.