

Matter 10 – Transport

Issue 3 – Parking Standards – Policy TRA4 and Appendix 1

Q1 How has the Council considered accessibility, the type, mix and use of development, the availability and opportunities for public transport, local car ownership levels and the need to ensure an adequate provision of spaces for plug-in and ultra-low emission vehicles when determining the car parking standards in Policy TRA4 and Appendix 1?

1.1 The Council has considered accessibility, the type, mix and use of development, the availability and opportunities for public transport, local car ownership levels and the need to ensure an adequate provision of spaces for plug-in and ultra-low emission vehicles when determining the car parking standards in Policy TRA4 and Appendix 1 as set out below.

1.2 The aforementioned considerations are set out at NPPF paragraph 111 as follows:

111. If setting local parking standards for residential and non-residential development, policies should take into account:

- a) the accessibility of the development;*
- b) the type, mix and use of development;*
- c) the availability of and opportunities for public transport;*
- d) local car ownership levels; and*
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.*

1.3 This is referenced at paragraph 8.12 of the Plan as follows:

8.12 National policy states that, when setting local parking standards for residential and non-residential development, policies should take into account: a) the accessibility of the development; b) the type, mix and use of development; c) the availability of and opportunities for public transport; d) local car ownership levels; and e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

Accessibility, and Availability of and opportunities for public transport

1.4 The Council considered the accessibility of the development and the availability of and opportunities for public transport (matters a) and c) above) primarily through explicit inclusion of reference to these matters in TRA4 a) i.; and through the approach to 'Parking Zones', in particular Zone 2 'Most Sustainable and Accessible Areas'.

1.5 The aforementioned matters are explicitly covered in TRA4 a) i. as follows (underlining added):

- a) *On-site car and cycle parking standards for new residential and non-residential development are set out in Appendix 1. Development proposals should:*
 - i. *Meet car parking standards as set out in Appendix 1, whilst taking into account the accessibility of the site to public transport and the nature of the use;*

1.6 Furthermore, the aforementioned matters have been considered through the approach to 'Parking Zones', in particular Zone 2 'Most Sustainable and Accessible Areas'; as set out in paragraphs 8.16 and 8.17 of the Plan as follows:

8.16 *"...For planning purposes the operation of the car parking standards is based on a zonal approach, with a degree of parking restraint imposed in locations that are most accessible to services, community facilities and public transport (Zone 2)..."*

8.17 *Zone 2 comprises the District's most sustainable and accessible areas, which are those areas within 800m (10 minute walk) of the City / town centre and mainline railway stations of St Albans and Harpenden. This includes the main town centre services and facilities, bus stops and mainline railway stations for the District's largest settlements. Within Zone 2 there is reduced need for parking for private cars.*

1.7 Appendix 1 of the Plan sets out in the table at Figure 1 that the 'Amount of Car Parking to be Provided' in Zone 2 is '50% of parking standard minimum; unless b) below applies' (which relates to locations within 400 metres walking distance of public car parks in defined centres).

1.8 Additional explanation of and justification for Zone 2 'Most Sustainable and Accessible Areas' is set out in more detail in the 'Parking Zones for applying Local Plan Parking Policy and Standards' Paper (INF 08.01) under the 'Methodology and Explanation' section, paras. 7 to 15, which sets out how the Council considered accessibility, and the availability and opportunities for public transport, when determining the car parking standards in Policy TRA4 and Appendix 1.

1.9 The above sets out how the Council considered accessibility, and the availability and opportunities for public transport, when determining the car parking standards in Policy TRA4 and Appendix 1.

Type, mix and use of development

1.10 The Council considered the type, mix and use of development through explicit inclusion of reference to the nature of the use in TRA4 a) i.; and through the setting of use-specific standards in Appendix 1 – Cycle and Car Parking Guidance and Standards for New Development.

1.11 The aforementioned matters are explicitly covered in TRA4 a) i. as follows (underlining added):

Parking Standards

- a) *On-site car and cycle parking standards for new residential and non-residential development are set out in Appendix 1. Development proposals should:*
 - i. *Meet car parking standards as set out in Appendix 1, whilst taking into account the accessibility of the site to public transport and the nature of the use;...*

1.12 Appendix 1 sets out use-specific standards in tables, as follows:

- Cycle Parking Standards: which reproduce the 'Suggested minimum cycle parking capacity for different types of land use' in Table 11-1 of the Department for Transport's (DfT's) Local Transport Note 1/20 'Cycle Infrastructure Design' July 2020. This sets out short stay and long stay cycle parking requirements for different land use types and subcategories.
- Residential Car Parking Standards: which set out car parking standards for uses C3 (Dwellinghouses) and C4 (Houses in multiple occupation) plus more specific Descriptions of subcategory of use, and for disabled motorists.
- Non-Residential Car Parking Standards: which set out car parking standards under 15no. main use categories plus more specific Descriptions of subcategory of use, and for disabled motorists.

1.13 The Council's approach to cycle parking standards set out in the Appendix 1 standards table, and in section 3 'Notes on cycle parking standards', follows the recommendations of the Local Highway Authority. As explained at Plan footnote 46, the Cycle Parking Standards table *"reproduces the 'Suggested minimum cycle parking capacity for different types of land use' in Table 11-1 of the Department for Transport's (DfT's) Local Transport Note 1/20 'Cycle Infrastructure Design July 2020; and if these DfT standards are updated the new updated standards will be applied"*. This is considered an effective approach to encourage sustainable modes of transport that is in line with the applicable national guidance.

1.14 The Council's approach to car parking standards; as reflected in the Appendix 1 standards tables, and in Appendix 1 sections 1 'General Guidance' and 2 'Notes on vehicle parking standards', reflects existing parking standards set out in Local Plan Review 1994 (LPCD 15.01) and Revised Parking Policies and Standards January 2002 (LPCD 15.11), but with notable updates as follows:

- a) Consolidation of the standards into a more concise format
- b) Updating Use Classes to reflect current Use Classes
- c) Clarification in Note 1.e) that additional spaces will not normally be required for householder extensions
- d) Omitting the current highest residential standard for '4 or more' bed properties; and
- e) Applying the 'Parking Zones' approach as alluded to above, including with respect of Zone 2 'Most Sustainable and Accessible Areas' where 50% of the

normal standards generally apply; and Zone 3 'Areas of likely overnight parking stress' where any shortfall against standards (including a Zone 2 reduction where applicable) is to be fully mitigated in accordance with Policy TRA4 c).

- 1.15 The approach of continuance of the current applicable standards, but updated as above to adhere to the aims of current national policy and applicable guidance, is considered to aid the effectiveness of the standards and ensure they are consistent with the aims of national policy.

Local car ownership levels

- 1.16 In the process of reviewing and updating the existing standards, local car ownership levels were assessed. Data from the 2021 census and traffic data from Local Highway Authority HCC were analysed, along with other relevant factors, in mapping Zone 3 'Areas of likely overnight parking stress', where any shortfall against standards (including a Zone 2 reduction where applicable) is to be fully mitigated in accordance with Policy TRA4 c). As set out in Parking Zones Paper INF 08.01:

18. The census and traffic flow data indicate that within St Albans District, car ownership and usage levels are high, albeit car ownership within the more urban wards is generally lower than more suburban wards. Taking this general picture of high ownership and high usage into account, in determining which specific areas should be within Zone 3 the following approach was taken: analysis of the physical site characteristics of different streets and areas, from mapping data and site visits; plus analysis of data relating to demand for parking permits in streets and zones in CPZ areas relative to the amount of on-street spaces available; informing the wider assessment of where there is likely to be existing overnight parking stress.

Provision of spaces for plug-in and ultra-low emission vehicles

- 1.17 The need to ensure an adequate provision of spaces for plug-in and ultra-low emission vehicles is addressed in TRA1 – Transport Considerations for New Development as follows:

b. Major proposals must demonstrate as appropriate how:

...

viii. The charging of plug-in and other ultra-low emission vehicles will be enabled in safe, accessible and convenient locations;...

- 1.18 Policy TRA4 sets out in relation to Electric Vehicle Parking:

Electric Vehicle Parking

h) Electric vehicle charging points or the infrastructure to ensure their future provision within a development, in addition to meeting Building Regulations standards, should

seek to accord with up to date guidance from the Local Highway Authority (Hertfordshire County Council), where proportionate.

- 1.19 It does not explicitly reference other ultra-low emission vehicles. Although the Council's particular focus in TRA4 was on electric vehicle charging points, it is noted that the wider category of 'plug-in and other ultra-low emission vehicles' are grouped in NPPF paragraph 111 (and at NPPF paragraph 116) as well as at TRA1 b); and may be subject of greater focus over the Plan period as technology advances. Taking this into account, it is proposed to explicitly add reference to adequate provision of parking spaces for plug-in and ultra-low emission vehicles ultra-low emission vehicles, through Main Modifications to TRA 4 as follows:

Electric and other ultra-low emission Vehicle Parking

h) Electric vehicle charging points or the infrastructure to ensure their future provision within a development, in addition to meeting Building Regulations standards, should seek to accord with have regard to up to date guidance from the Local Highway Authority (Hertfordshire County Council), where proportionate. Adequate provision of parking spaces for plug-in and ultra-low emission vehicles should be made in major developments.

N.B. An additional proposed Main Modification is also shown above, discussed in answer to Q3 below.

- 1.20 It is considered that these proposed Modifications clarify the requirement, improve the effectiveness of the Policy, enhance the environmental sustainability of the Policy and ensure consistency with the aims of national policy.

Overall approach

- 1.21 With regard to the Council's overall approach to Parking Standards in Policy TRA4 and the associated Appendix 1, it should be noted that HCC as Local Highway Authority support the approach in their Regulation 19 comments as follows (set out on pages 2293 and 2294 of LPCD 20.03):

Draft Policy TRA4 - Parking, provides parking standards for new developments. This policy supports active travel in numerous ways. First, it provides a requirement for bicycle parking to encourage more people to cycle instead of drive. It also states new development at Broad Locations should demonstrate alternatives to car use to reduce car parking spaces. This policy also supports car clubs to reduce private car parking spaces, bike share schemes and electric vehicle charging points in new developments. We support this policy as this will have a positive impact on residents' health and wellbeing by supporting active travel over private car use.

Conclusion

- 1.22 Taking the above into account, it is considered that the Council has appropriately considered the accessibility, the type, mix and use of development, the availability

and opportunities for public transport, local car ownership levels and the need to ensure an adequate provision of spaces for plug-in and ultra-low emission vehicles when determining the car parking standards in Policy TRA4 and Appendix 1.

Q2 What is the justification for taking a different approach with the ‘broad locations’ under Policy TRA4? Are the policy requirements justified and effective?

What is the justification for taking a different approach with the ‘broad locations’ under Policy TRA4?

2.1 Policy TRA4 sets out the following approach in relation to Broad Locations:

New Development at Broad Locations

e) New development at Broad Locations should:

- i. Prioritise sustainable and active modes of transport;*
- ii. Demonstrate to the satisfaction of the Council that attractive alternatives to the private car would lead to reduced demand, such as to justify a reduction in parking provision against the standards; and*
- iii. Develop an appropriate parking strategy with lower than standard parking requirements which must be agreed with the Council and which can realistically be enforced by planning obligations and / or on-street parking controls.*

2.2 The justification for this is summarised in Plan paragraph 8.16 and in paragraph 24 of the ‘Parking Zones for applying Local Plan Parking Policy and Standards’ Paper (INF 08.01) as follows:

8.16... There is also scope for large new developments at Broad Location sites (Zone 4) to prioritise sustainable and active modes of transport such as to require reduced parking provision, as part of a bespoke parking strategy...

...

Parking Zone 4

24. Parking Zone 4 applies to Broad Locations only, and they are shown on the Policies Map. Broad Locations are identified as large urban extensions of 250 or more homes or strategic scale employment, and there is scope for large new developments at Broad Location sites to prioritise sustainable and active modes of transport such as to require reduced parking provision, as part of a bespoke parking strategy.

2.3 The different approach is reflective of the scale of development at Broad Location sites, which provides opportunity for them to deliver significant additional infrastructure and services both for the site and the wider area. For example, these sites have the greatest opportunity to deliver car clubs, electric bikes, scooters, e-scooters, bike hire etc.

2.4 Development of these sites is required to come forward through a co-ordinated and Masterplanned approach (as set out in Policy LG1 – Broad Locations) that helps to ensure the delivery of significant additional benefits for both existing and new communities in the area, delivers enhanced opportunity to travel by sustainable modes of transport, and reduces the need to travel.

2.5 These principles are reflected in the reasoned justification for Policy LG1 as follows:

3.29 A Broad Location is considered to be a large development of 250 or more homes (or equivalent scale of employment use) that is of sufficient size to deliver significant additional infrastructure and services both for itself and the wider area. There is quite often more than one landowner across the Broad Location and the Council requires a coordinated approach.

3.30 Where there is a good range of existing services and facilities that are accessible from the Broad Location, the proposed development will be of a scale to deliver significant additional services for both existing and new communities in the area.

3.31 Locally accessible facilities will support a sustainable neighbourhood that reduces the need to travel and encourages a sense of community.

3.32 Masterplanning is essential to guide a well-designed development. A coordinated approach will be required with the District and County Council and other parties to ensure essential infrastructure such as sustainable transport, roads, community facilities, open spaces and schools are provided in a timely manner.

2.6 It is considered that the scale of opportunity for delivery of sustainable infrastructure at Broad Location sites enables development to meet the requirements of TRA4 e) as set out above.

2.7 Furthermore, the approach and requirements in relation to Broad Location sites in Policy TRA4 e), and the requirement for a proper and co-ordinated Masterplanned approach in Policy LG1, are consistent with the aims of NPPF Section 9 ‘Promoting sustainable transport’; including paragraphs 108 to 110.

2.8 In addition, it should be noted that HCC as Local Highway authority support the approach in their Regulation 19 comments as follows (set out on pages 2293 and 2294 of LPCD 20.03; underlining added):

Draft Policy TRA4 - Parking, provides parking standards for new developments. This policy supports active travel in numerous ways. First, it provides a requirement for bicycle parking to encourage more people to cycle instead of drive. It also states new development at Broad Locations should demonstrate alternatives to car use to reduce car parking spaces. This policy also supports car clubs to reduce private car parking spaces, bike share schemes and electric vehicle charging points in new

developments. We support this policy as this will have a positive impact on residents' health and wellbeing by supporting active travel over private car use.

- 2.9 It should also be noted that the Statements of Common Ground with Broad Location site promoters include agreement that they “*generally support what is set out in the Local Plan Part A*” (see SADC/ED12-ED22, and SADC/ED25-ED27).

Are the policy requirements justified and effective?

- 2.10 The NPPF sets out at paragraph 35 the tests of ‘soundness’, including:

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

- 2.11 Taking the above into account, it is considered that the policy requirements for Broad Locations in TRA4 are justified and effective.

Q3 What is the justification for referring to Hertfordshire County Council guidance in Policy TRA4(h) and (i)? To be effective, should any requirements be contained in the Plan?

- 3.1 On reflection, the Council recognises that it would be more appropriate to use ‘should have regard to’ policy wording in Policy TRA4(h) and (i). However, it is considered that there is robust justification for referring to Hertfordshire County Council guidance in Policy TRA4(h) and (i), and that it is not considered justified or effective to explicitly include this current guidance in the Policy wording.
- 3.2 The proposed amended wording is set out in the proposed Main Modifications below:

Electric and other ultra-low emission Vehicle Parking

h) Electric vehicle charging points or the infrastructure to ensure their future provision within a development, in addition to meeting Building Regulations standards, should ~~seek to accord with~~ have regard to up to date guidance from the Local Highway Authority (Hertfordshire County Council), where proportionate. Adequate provision of parking spaces for plug-in and ultra-low emission vehicles should be made in major developments.

Layout

- i) *Where parking is provided, it must be of a design and layout that will function satisfactorily and safely, ~~as set out in~~ and should have regard to up to date guidance from the Local Highway Authority (Hertfordshire County Council).*

N.B. Additional proposed Main Modifications are also shown above, discussed in answer to Q1 above.

- 3.3 It is considered that adherence to up to date guidance from the Local Highway Authority (Hertfordshire County Council – HCC) would generally be likely to constitute a material planning consideration in the assessment of a development proposal that included parking. This is due to the general desirability for parking to follow such guidance, and noting that HCC are the Highway Authority and are a statutory consultee who make recommendations based on their up to date guidance. Development proposals which do not adhere to this guidance may not be deliverable in practice; and such non-adherence may potentially lead to undesirable consequences. Such potential undesirable consequences may include, for example, undeliverable works to the highway that would be required to deliver the required parking for a development, or highway safety implications.
- 3.4 Although this guidance is not contained in the Plan, the requirement to have regard to up to date guidance from the Local Highway Authority is considered to represent a significant material planning consideration where relevant in determining planning applications; and the inclusion of the reference in TRA4 h) and i) is intended to avoid undesirable consequences including those listed in the paragraph above.
- 3.5 Furthermore, as the local and County Council guidance in relation to vehicle charging points or in relation to design and layout of parking, is considered liable to change over the Plan period; it is not considered justified or effective to explicitly include this current guidance in the Policy wording.
- 3.6 Taking the above into account, on reflection the Council recognises that it would be more appropriate to use 'should have regard to' policy wording in Policy TRA4(h) and (i). However, it is considered that there is robust justification for referring to Hertfordshire County Council guidance in Policy TRA4(h) and (i), and that it is not considered justified or effective to explicitly include this current guidance in the Policy wording.