

**Statutory Consultation Phase – Representations:
Draft SPD on Vehicle Parking Provision at New Development in North Hertfordshire
Sustainability Appraisal and Strategic Environmental Assessment - Final Report**

Ref. no.	Name of respondent	Document ref./ paragraph no.	Summary of Representations	Council response
01	Baldock Area Committee	SPD: General comment	<p>Resolved that:</p> <p>1 The report of the Head of Planning and Building Control be noted.</p> <p>2 Officers be requested to ensure District input into the Scrutiny review by HCC into the provision of cross-overs, allowing people to park their vehicles within their own property and reducing the number of vehicles parking on the roads.</p> <p>Acknowledge need for the Council to adopt guidance on vehicle parking at new development. To do this the Council would need to adopt a new SPD in line with national policy.</p>	Comments of discussion noted.
02	The Countryside Agency (Emma Cooper, Planning & Transport Casework Manager)	SPD & SA/SEA: General comment	Our planning policy statement "Planning Tomorrow's Countryside" sets out our vision for rural areas and provides advice to local planning authorities, to the Government and to developers on how the planning system should operate and evolve to achieve this. The policy statement also advises that the Agency's main role in the planning system is at a strategic level through reviewing and commenting on regional planning guidance, statutory development plans produced by local authorities and other strategic policy documents.	No response required.

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	The Countryside Agency (Emma Cooper) continued		We do not have the staff resources unfortunately to be involved in greater detail. Although the Agency is a consultation body under SEA Regulations, we generally do not wish to comment on individual draft SEAs. Given our strategic priorities the Agency will not be making any comment on the draft you have submitted to us. We should like to stress that the absence of comment or direct involvement in this case is simply an expression of our priorities. It should not be taken as implying a lack of interest or indicating either support for, or objection to, the proposal.	
03	English Nature (Frances Falconer, Conservation Officer)	SPD & SA/SEA: General comment	<p>English Nature welcomes the consideration and inclusion of our comments given at the scoping stage of the SEA (letter dated 4 October 2005) in the current document. We have no additional comments to make on the SA/SEA for this Draft SPD at this stage.</p> <p>English Nature assumes that the SA/SEA informs and will be used alongside the SPD and therefore does not wish to provide detailed comment on the Draft SPD at this stage.</p> <p>English Nature reserves the right to submit further advice in the future should the need arise.</p>	No response required.

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04	Environment Agency (Candice Beard, Planning Liaison Officer)	SPD & SA/SEA: General comment	<p>We are satisfied with this SPD and have no comments to make.</p> <p>As stated by phone on 1 December 2005, our main concerns are with water quality issues that are associated with the drainage of car parking and as long as these are addressed in the Core Strategy then we are satisfied. Accordingly we have no comments to make on the SA/SEA.</p>	No response required.
05	Essex CC: Planning (Roy Leavitt)	SPD: General comment	No comments to make.	No response required.
06	Fairview New Homes Ltd (Amit Malhotra, RPS Group)	SPD: Accessibility contributions (Figure 3.1)	<p>Objection to the accessibility based contributions shown in Figure 3.1 on the grounds that the Council should adopt a more flexible approach. In some proposals, development may need to include low levels of parking provision having regard to viability and, in this case of residential development, ensure proposals meet the high-density requirements of PPG 3. PPG 13 states "Given that there should be no minimum parking requirements for development, it is inappropriate for a local authority to seek commuted payments. Circular 05/05 states that planning obligations should not "set out precise requirements or to impose rigid formula." The level of contribution</p>	<p>Not agreed. Accessibility contributions are not directly referred to in Figure 3.1 and are not proposed in the Draft SPD. Paragraph 1.11 of the Draft SPD states that "The Council will separately consider its approach to accessibility contributions, which seek to reinforce locational policies." Emerging guidance (by NHDC/HCC) on s106 contributions is likely to supersede HCC's current guidance on accessibility contributions (as set out in HCC's SPG on Parking Provision at New Development, December 2000). It is important to note that accessibility contributions are not commuted payments. The level of accessibility contributions sought depends very much on the</p>

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	Fairview New Homes Ltd (Amit Malhotra, RPS Group) continued		should depend on the circumstances of each development. Therefore, Fairview New Homes object to the seeking of accessibility contributions on the grounds that it should be more flexible.	circumstances of each development and GO-East has confirmed – in the case of East Herts Council’s Local Plan Inquiry – that accessibility contributions comply with the tests sets out in Circular 1/97 (now superseded) and Circular 05/05. Accessibility contributions are calculated on the number of on-site parking spaces provided, hence the lower the parking provision the lower the contribution sought. Circular 05/05 (paragraph B33) states that “Local authorities are encouraged to employ formulae and standard charges where appropriate, as part of their framework for negotiating and securing planning obligations.”
07	Hertfordshire Constabulary (Keith White)	SPD: General comment	Feel that an opportunity may have been missed in not identifying the requirement to achieve safe and secure communities. Found no mention anywhere in the document of the need “to deliver sustainable developments and creating sustainable and safe communities” (PPS1 Key Principles 13 (vi)). The same document also suggests (under the Design paragraph 36) that one of the key objectives includes that developments should “create safe and accessible environments where crime and disorder or the fear of crime does not undermine quality of life or community cohesion.” Vehicle crime in Hertfordshire is the number one crime recorded and this crime can have a major detrimental effect on developing strong, vibrant and	Agreed. Whilst the SPD cannot introduce new Council policy, it could include some references on the subject of safe and secure communities: Refer to safe and secure communities/PPS 1 and companion document in paragraph 2.9 of the SPD. Include short paragraph on the subject at the end of Section 3 of the SPD.

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	Hertfordshire Constabulary (Keith White) continued		<p>sustainable communities, as advised within PPS1.</p> <p>The ODPM document “Safer Places – The Planning System and Crime Prevention” has been published as a companion to PPS1 and sets out planning guidance to help achieve safer places and well designed sustainable communities. This document recommends that planning policies should have at least one general policy to deliver planning’s contribution to crime prevention and community safety. Request to include a suitable over-arching paragraph that commits design and the designer, in this case car parking, cycle, motorcycle etc, to help prevent and reduce crime.</p>	
08a	Hertfordshire CC: Forward Planning Unit (Roxanne Glaud, Strategy Development Manager for Northern Herts)	SPD: General comment	<p>The County Council welcomes the SPD. We understand it will reduce the decision making period for new planning applications as there is an agreed policy for parking provisions within North Herts. The zonal system is supported for the following reasons:</p> <ol style="list-style-type: none"> 1 It will encourage public transport and more sustainable choices of travel where it is readily accessible. 2 It will seek to avoid the problems of over or under provision by maximum allowances. 3 It will address the issues of “spill over” of parking in residential and less appropriate places. 4 It provides a mechanism for checking that new 	No response required.

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	Hertfordshire CC: Forward Planning Unit (Roxanne Glaud) continued		applications are able to cope with the new parking provisions. 5 It also addresses the issue of town centre parking for new applications as well as regeneration of the town centre.	
08b	Hertfordshire CC: Forward Planning Unit (Katherine Dumbovic, Passenger Transport Forward Planning Officer)	SPD: General comment Paragraph 2.30	The Passenger Transport Unit makes the following comments: 1 To ensure consistency the term “public transport” should be replaced by “passenger transport”. 2 The principal of promoting the use of non car modes is welcomed. 3 There is concern that if there is under-provision of parking, the “overspill” parking will be on the public highway and potentially in bus stops and bus lay-bys. 4 In reference to paragraph 2.30, we would not rule out Park and Ride schemes. However, suitable sites and in depth economic appraisals would need to be carried out to ensure viability. Experience in Bishop’s Stortford illustrates that Park and Ride schemes do not always provide the anticipated benefits because they can be underused. 5 We support the suggestion that the situation in Baldock will improve with the opening of the bypass. This is likely to improve the pedestrian environment by removing through traffic. This	1 Agreed. Replace all references to “public transport” with “passenger transport.” 2 No response required. 3 On-street parking enforcement will reinforce the zonal approach. TA/TS’s will be used to anticipate and address this problem before it arises. If overspill parking is likely to occur then the Highway Authority will be required to advise on acceptability of development or not. 4 Agreed, but no edit to paragraph 2.30 required. 5 No response required.

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	Hertfordshire CC: Forward Planning Unit (Katherine Dumbovic) continued	Paragraph 3.93 Appendix C	<p>should make walking and cycling to the rail station more attractive.</p> <p>6 In reference to paragraph 3.93, we support the principle that coaches need their own facilities (as opposed to using bus stops) for picking up/setting down. The final sentence should be rewritten to clearly express the need to design layouts which mean coaches do not need to reverse in or out of sites.</p> <p>7 With regard to Appendix C - Passenger Transport Facilities – it would be more appropriate if the cycle parking standards at bus and rail stations used the same criteria as for car parking; that is “to be decided in each case on individual merits”. The rationale for this is that there are many factors influencing whether or not people cycle to the rail station and some rail stations will have greater demand for cycle parking than others.</p> <p>Appendix C is for maximum parking standards, which means that the level of cycle parking provision is restricted even if demand is greater.</p>	<p>6 Agreed. Edit last sentence of paragraph 3.93 as suggested.</p> <p>7 Agreed that suggested edit to cycle parking standards at bus and rail stations is desirable but GO-East requested at the outset of this work that the Council uses the standards set out in HCC’s SPG; therefore no change to SPD required.</p> <p>Agreed. Edit Appendix C title page (now Appendix B in amended version) to clarify that only the car parking standards are maximums.</p>
08c	Hertfordshire CC: Forward Planning Unit (Constantina Bichta, SEA Officer)	SPD & SA/SEA: General comment	In view of the comments made on the scoping report for this SA/SEA in October 2005, there are no further comments to add.	No response required.

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	Hertfordshire CC: Transportation Planning and Policy (Gary Speller) continued		<p>appears to be no direct link or information as to how the results of the consultations affect the interpretation of the standards. There is also considerable detail in the main text, which whilst backing up the standards and approach, is not required to determine the parking requirements and provision. The document seems overcomplicated in respect of the transport assessment (TA) process and how parking is assessed for larger developments. This is particularly the case for Figure 3.1, paragraphs 3.12 and 3.13. I would recommend that the text is simplified in this regard with the main body of the document concentrating on the maximum parking standards and zoning reduction process. The additional supporting information would be more usefully included within the appendix material. This is also the case with car ownership statistics set out in paragraphs 3.56 – 3.57 and 3.62 – 3.66.</p> <p>The text should also reflect the fact that in most cases the planning authority would use the standards set out in this SPD to guide applicants, unless the Highway Authority could cite factors which would be detrimental to highway safety or operation. Larger developments would be subject to TAs and would be determined in conjunction with both the planning and Highway Authority.</p>	<p>consider, which will be taken into account ultimately in the TA process. This is why there is detail in the main text and in the description of the role of parking standards and provision in the TA process.</p> <p>Agreed. Edit text to incorporate these points.</p>

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	Hertfordshire CC: Transportation Planning and Policy (Gary Speller) continued	Paragraph 3.21	3.21 Remove “the general presumption is to use the lower provision that applies within each range.”	Not agreed. The general presumption to use the lower provision that applies within each range is a useful starting point for discussion with applicants and is the same presumption as that set out in HCC’s SPG (paragraph 24). As stated in that document, “having a range allows development to be tailored to particular circumstances.” If the general presumption were not to be to use the lower provision, zone type 4 would automatically allow for unfettered demand and hence be no different to locations “elsewhere” beyond the urban area.
		Paragraph 3.42	3.42 I would recommend that this is reworded simply to allow for cases where there is limited short-stay parking at certain locations. In this way the document will remain valid should parking conditions change in particular areas.	Partly agreed. Could edit paragraph 3.42 to refer to local/neighbourhood centres in addition to town centres.
		Paragraph 3.43	3.43 Remove “Furthermore, it may be ...”	Not agreed. This sentence is not unreasonable.
		Paragraph 3.46	3.46 As far as I am aware, the TRICS research was based on retail uses combined with foodstore uses which tend to demonstrate higher cross-visitation. It is not appropriate to quote possible reductions in percentage terms as such reductions should be demonstrated by the developer.	Agree to removing percentages from paragraph 3.46 and editing the text to refer to some recent TRICS research which indicates that additional trip attraction as well as trip reduction due to trip linking are both possible outcomes of mixed-use.

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	Hertfordshire CC: Transportation Planning and Policy (Gary Speller) continued	Paragraph 3.49	3.49 Include "Accessibility by non car modes could be increased by including new or enhanced cycle facilities and cycle parking contributions, better pedestrian linkages or contributions towards passenger transport and sustainable transport schemes".	Partly agreed. Edit paragraph 3.49 to read: "Accessibility by non-car modes could for example be increased by including new or enhanced cycle facilities and cycle parking provision, better pedestrian linkages, contributions towards passenger transport and sustainable transport schemes and the implementation of a Travel Plan."
		Paragraph 3.51	3.51 Add "if the developer can demonstrate that lower parking provision is appropriate"	Partly agreed. Edit first sentence of paragraph 3.51 to read: "In line with PPG 13, phased introduction of restraint may be acceptable at some new developments if the developer can demonstrate that phasing is appropriate".
		Paragraphs 3.74-3.78	It would be more appropriate to include the details concerning loss of car parking within the appendix material.	Not agreed, no apparent need to edit this section of the Draft SPD (paragraphs 3.74 – 3.78). This concurs with the adopted NHDC Car Parking Strategy.
		Paragraph 3.78	3.78 "or contributions toward sustainable transport schemes which will improve travel patterns within the vicinity of the development."	Partly agreed. Edit next to last sentence of paragraph 3.78 to read: "...but only after consideration is given to improvements to accessibility by non-car modes within the vicinity of the development (including contributions towards sustainable transport schemes) and a Travel Plan has been formulated with a view to making travel patterns more sustainable."

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	Hertfordshire CC: Transportation Planning and Policy (Gary Speller) continued	Paragraph 3.85 Paragraphs 4.1-4.2	<p>3.85 Add "Cycle sheds or appropriate cycle parking will be sought for new residential development."</p> <p>I would suggest that the summary is expanded beyond that of a relatively complicated flow chart.</p> <p>The zoning analysis and maximum standards are supported by HCC however I would appreciate it if we could meet to discuss the above.</p>	<p>Partly agreed. Edit last sentence of paragraph 3.85 to read "Cycle sheds or appropriate secure cycle parking will be sought for new residential development."</p> <p>Not agreed. The flow chart is considered useful and not complicated.</p> <p>Comment noted.</p>
10	Hitchin Area Committee	SPD: General comment	<p>Resolved that:</p> <p>1 The information presented in the report and the Draft SPD be noted.</p> <p>2 The Transport Planning Officer be requested to take note of the following comments and suggestions for incorporation in his report to Cabinet at the meeting held on 28 February 2006:</p> <p>The SPD should include policies on public transport and make reference to and incorporate the outcomes of the Transport Best Value Fundamental Service Review, the Scrutiny Task and Finish Group and the Member Working Group: Public Transport.</p> <p>Consideration should be made re. zoning Hitchin station and its environs.</p>	<p>Not issues directly for this SPD but noted in the context of wider policy development.</p> <p>Comment noted. Zoning re. parking at new non-residential development reflects the approach set</p>

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	Hitchin Area Committee continued		<p>Consideration should be made to the definition of non-residential as to the inclusion or not of business and commercial premises, and the lack of public transport provision in the Hitchin Industrial Area as this area is outside residential zones.</p> <p>3 Members of the Hitchin Committee should forward any further comments or suggestions in writing to the Transport Planning Officer no later than the close of the consultation period on 6 January 2006.</p>	<p>out in HCC's SPG/Best Practice Guide on this subject. Re. parking at new residential development, the zoning reflects the proposed approach set out in the Draft SPD. As Hitchin station is not in the town centre, the proposed residential restraint zone (town centre only) does not extend as far as the station and its environs.</p> <p>Comment noted. This comment seems to be referring to whether the employment area should be Zone 4 given the lack of passenger transport services. Zone 4 is considered to be appropriate as it allows a range of parking provision from 75% to 100% of the maximum standard for non-residential uses. This means that if deemed appropriate, standards could be applied at 100% (i.e. the same as in non-urban areas).</p> <p>Comment noted.</p>

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11	Home Builders Federation: Eastern Region (Jan M Molyneux, Consultant to Regional Planner)	SPD: General comment/zonal mapping	<p>The Draft SPD is unnecessarily over detailed and complex and does not provide clear advice relating to parking provision. The document seeks to give detailed advice regarding the suitability of areas for varying levels of parking provision but cannot take into account the design of a specific development, the suitability of a site for high/low levels of parking provision etc. The boundaries chosen for the various zones are arbitrary and not clearly related to land uses etc.</p> <p>The guidance provided by the County Council and repeated at Appendix C is clear and easy for developers to use. The SPD should follow this format and delete the unnecessary detail which makes the document difficult to use.</p>	<p>Not agreed. The zonal maps have been derived directly from the zoning process set out in HCC's SPG (December 2000) and accompanying accepted methodology in HCC's Best Practice Guide (March 2003) on Parking Provision at New Development. The boundaries are not arbitrary. In addition to land use and physical boundaries (e.g. roads, rivers, railway lines), the mapping takes into account accessibility by non-car modes, economic health and associated environmental considerations.</p> <p>Not agreed. There are many aspects to consider when determining parking provision at new development. The guidance reflects all these in appropriate detail. HCC guidance requires districts to produce local zone maps/SPD.</p>
12	Letchworth Area Committee	SPD: General comment	<p>Resolved that the following comments and suggestions made by the Committee be passed to the Transport Policy Officer for incorporation into his report to Cabinet at its meeting to be held on 28 February 2006:</p> <p>1 The Committee welcomed the Draft SPD in principle, but felt that it did not meet the Garden City principles, whereby it was not viable to reduce parking spaces.</p>	<p>1 Noted, however, the approach set out in the Draft SPD means that parking provision at new development will be tailored to local circumstances. Significant proposals will need to be supported by a TA. Furthermore, as stated in paragraph 3.42 of the Draft SPD "Where there is a shortfall in short-</p>

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	Letchworth Area Committee continued		<p>2 Concern was expressed that, by reducing the number of spaces required at non-residential developments, there would be a continued increase in the number of white vans that workers were having to take home at night, adding to the problems with parking in residential areas.</p> <p>3 The stress on car use rather than car ownership is unsupportable – even people living in the town centre invariably own at least one car, and this must be taken account of (although acknowledgement that problems with increasing car ownership would not be resolved until public transport was made more accessible).</p> <p>Acknowledge need for the Council to adopt guidance on vehicle parking at new development. To do this the Council would need to adopt a new SPD in line with national policy.</p>	<p>stay public parking ..., greater (shared) provision may be sought on a development site beyond that indicated by direct application of the zone-based approach.”</p> <p>2 Parking restraint at new employment developments is aimed at restraining commuter traffic, not genuine operational vehicles (which may be white vans). If white vans are taken home by workers, the more likely explanation is that they are the workers’ main means of transport (either a company owned vehicle or privately owned).</p> <p>3 The SPD addresses this point where the maximum residential standards suggested in Table 3.2 of the Draft SPD accept that even people living in the town centre invariably own at least one car.</p> <p>Agreed. The Draft SPD is considered to be in line with national policy. A similar approach has been adopted in the majority of Hertfordshire authorities and to the satisfaction of GO-East.</p>

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13	Letchworth Garden City Heritage Foundation (Tracy Harvey, Estate Management)	SPD: General comment	<p>Letchworth Garden City Heritage Foundation (LGCHF) has concerns regarding the Draft SPD. The main areas of concern are based upon the proposed reduction in unfettered demand of non-residential car parking provisions by zone type. Concern is raised that this reduction is too high for North Hertfordshire, and in particular Letchworth Garden City, to ensure continued vitality and viability.</p> <p>The document does not reflect the guidance within PPG 13. For example, the document will threaten levels of future investment within the town centre and does not set out the minimum development size that the standards will apply to (para 53, PPG 13).</p> <p>A reduction in non-residential parking will undermine vitality, viability and the local economy. Paragraph 3.25 emphasises the strength of the</p>	<p>Not agreed. The approach set out in the Draft SPD means that parking provision at new development will be tailored to local circumstances and will have regard to TAs/TSs. Furthermore, as stated in paragraph 3.42 of the Draft SPD “Where there is a shortfall in short-stay public parking ..., greater (shared) provision may be sought on a development site beyond that indicated by direct application of the zone-based approach.”</p> <p>Not agreed. The approach set out in the Draft SPD takes into account the strength of the local economy on a County-wide basis. It does not set out the minimum development size that the standards will apply to as all developments, whether large or small, have travel impacts and the cumulative effects of several small developments can be significant. The problem with thresholds is that they encourage avoidance tactics, whereby applications are submitted just below the threshold. PPG 13 states (paragraph 53) that “Local authorities should use their discretion in setting the levels of parking appropriate for small developments so as to reflect local circumstances.”</p> <p>Not agreed. The approach set out in the Draft SPD will only apply to new development, hence existing parking provision will not be affected unless there</p>

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	Letchworth Garden City Heritage Foundation (Tracy Harvey) continued		<p>local economy as a reason to impose travel demand measures without occurring harm. This is not supported by economic data for the town centres where comparison retail expenditure leakage to centres outside the district is high. It is argued by LGCHF that significant reduction in non-residential car parking will further undermine the attractiveness of the local town centres to users, hence adversely affecting viability and vitality. Studies show that there is currently a significant level of comparison retail shopping leakage from the towns in North Hertfordshire. Without major retail development these shopping patterns are unlikely to change. The positions of North Hertfordshire's Towns in the retail hierarchy of town centres has fallen over time and will continue to fall without inward investment.</p> <p>The proposed reductions in non-residential car parking do not reflect the desires of the users and potential users of the town centres. The Draft SPD fails to take into account the numbers of residents within each of the towns who do not visit the town centre currently. If the viability of town centres is to be retained, if not improved, within the current retail hierarchy, preventing further retail expenditure leakage and supporting sustainability then the town centres need to be attractive for local residents,</p>	<p>are proposals for extensive town centre redevelopment. Furthermore, as stated in paragraph 3.42 of the Draft SPD "Where there is a shortfall in short-stay public parking ..., greater (shared) provision may be sought on a development site beyond that indicated by direct application of the zone-based approach."</p> <p>Not agreed – see above.</p>

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	Letchworth Garden City Heritage Foundation (Tracy Harvey) continued		<p>which would include easy access to car parking and other transport modes. For example, in Letchworth Garden City, only 64% of residents visit the town centre on a weekly basis (NHDC retail study 2004). To promote sustainability and viability, the “missing” 36% need to visit the town centre more frequently.</p> <p>The failure to reflect the desires of users is further empathised within Letchworth GC and Baldock by the number of residents quoting the fact that they liked the good (current) parking (NHDC Household Survey Feb/March 2004). And conversely the number of responses in the same survey who liked least the lack of parking and cost. The survey also identified “improved parking/make parking cheaper” both in Hitchin and Letchworth GC as the highest % response for suggested improvements. A reduction in non-residential car parking standards for new developments are not supported by the outcomes of this recent household survey.</p> <p>The document does not demonstrate that reduced non-residential car parking standards would be supported by other modes of transport. Paragraph 3.30 implies that there is a significant amount of out commuting from Letchworth GC to London and Cambridge using train services. Only 7.8% of the</p>	<p>Not agreed – see above.</p> <p>Not agreed. The Draft SPD seeks to influence transport choices where alternative modes exist or can be provided, in line with Government policy. Letchworth already largely adheres to the guidance. Town centre shops and offices have very little dedicated private parking, relying instead</p>

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	Letchworth Garden City Heritage Foundation (Tracy Harvey) continued		<p>working population commute from Letchworth to London compared to 10.6% in Hitchin and 14.8% in Hatfield. Of this 7.8%, not all will use train services. Therefore the accessibility argument, which appears to have been progressed in this paragraph is weakened. Without convenient, practical and affordable alternative modes of transport, reduced non-residential car parking standards will only undermine the vitality and viability of new developments.</p> <p>The document has been produced in isolation without reference to accessibility contributions. There is concern that the Council has not considered within the same document or in parallel its approach to accessibility contributions. Reassurance is sought therefore that the proposed reduction in HCC car parking standards within North Herts will not result in a penalisation of developers whereby the higher the reduction in car parking provision the higher the accessibility contribution.</p> <p>In conclusion, the degree of reduction is too high for North Hertfordshire, and in particular Letchworth Garden City, to ensure continued vitality and viability. The document as currently set out will undermine proposals for the much needed</p>	<p>on the publicly controlled supply. It is therefore this public supply that largely influences vitality and viability, as explained in the draft SPD.</p> <p>Not agreed. Accessibility contributions are soon to be considered by the Council in the context of another SPD. The Council can reassure LGCHF that in accordance with the approach set out in HCC's SPG, the lower the on-site parking provision, the lower the accessibility contribution.</p> <p>Not agreed for the reasons set out in the above responses.</p>

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	Letchworth Garden City Heritage Foundation (Tracy Harvey) continued		revitalisation of Letchworth GC town centre, which have already been supported "in principle" by NHDC.	
14	Royston Area Committee	SPD: General comment	Resolved that the report of the Head of Planning and Building Control be noted. Acknowledge need for the Council to adopt guidance on vehicle parking at new development. To do this the Council would need to adopt a new SPD in line with national policy.	Comments of discussion noted.
15	Southern Rural Area Committee	SPD: General comment	Resolved that the Draft SPD be reviewed and any comments and/or suggestions be fed back in writing to the Projects Manager (Planning Policy) by 6 January 2006. Acknowledge need for the Council to adopt guidance on vehicle parking at new development. To do this the Council would need to adopt a new SPD in line with national policy.	Comments of discussion noted.
16	Welwyn Hatfield Council (Paul Everard, Planning Policy)	SPD: General comment	I wish to register support for the document as it is in accord with HCC's SPG and does not conflict with this Council's Parking Standards SPG.	No response required.

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17	Dave Howarth, Hitchin	SPD: General comment	<p>I believe policies intended to reduce vehicle use by restricting parking are fundamentally misguided. It should certainly be a goal to encourage efficient use of car parking spaces by sharing and good estimation of requirements. It should certainly be a goal to reduce travel needs generally and to make more efficient use of resources when travel happens. But in my opinion, parking provision should be judged purely as a necessity to be met as required, not as a strategic tool itself.</p> <p>Restricting parking simply increases stress and frustration among motorised vehicle users and also among other road users because of the inevitable parking in odd places. Town centres, workplaces and residential streets become unattractive problems and sources of irritation and risk, when they should be sources of enjoyment, fun, relaxation and security.</p> <p>Economic incentives are reasonable but ideally these should come at a much higher level than parking charges. Once a person has bought a car and paid the annual bills for insurance, maintenance, tax etc the marginal cost for using it makes it difficult for public transport to compete. All these bills should instead be charged and collected by usage, most likely as a surcharge when fuel is</p>	<p>Not agreed. As acknowledged in the representation, the SPD approach is compliant with national and regional policy (as well as County policy). Parking management is widely acknowledged to be a major influence on travel behaviour and is therefore clearly a strategic tool.</p> <p>Not agreed. The approach set out in the Draft SPD is but one aspect of the Council's car parking strategy. On-street parking enforcement will reinforce the zonal approach, thus reducing the likelihood of parked cars causing highway obstruction.</p> <p>Not agreed. As acknowledged in the representation, the SPD approach is compliant with national and regional policy (as well as County policy). NHDC clearly has no remit to alter national taxation policies affecting travel costs.</p>

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	Dave Howarth, Hitchin continued		<p>bought. We should simplify the interface to the public.</p> <p>I am aware that your policies are strongly constrained by national and regional policy. It is also my view that you should oppose and ameliorate any constraints that interfere with implementing the policies I suggest.</p> <p>Policies towards reduction of resource usage by ground transport are useless and nonsensical whilst the same policies ignore the adverse effects and environmental costs of air transport and encourage its growth.</p>	<p>Not agreed. The Council does not wish to oppose national and regional policy.</p> <p>Partly agreed re the adverse effects and environmental costs of air transport but the SPD approach is compliant with national and regional policy (as well as County policy). It is not sensible to withdraw one policy initiative simply because of inconsistency elsewhere. Global environmental problems are, by necessity, tackled incrementally.</p>

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