

[REDACTED] [REDACTED]

23/01/2023

Dear Sir

I am writing to object to the increase in the number of proposed properties to be built under planning applications [6/2022/2901/MAJ](#). I am writing on behalf of [REDACTED], [REDACTED], the west of the new development, (The Development), and its nearest residential neighbour.

The basis of my [REDACTED] objection

The original council proposal envisaged some 250 properties being built onto the site; [REDACTED] is content with. The developer is proposing 313 properties, an increase of about 25%. [REDACTED] objects to the LARGE INCREASE in the number of units proposed; he does not object to the project as a whole. His objection relates to the lack of residential and visitor parking on The Development.

The demand for residents' parking cannot be met by the developer

The [Transport Assessment](#) (TA) has severely under-estimated the demand for parking by residents (see Annex AA for the detail):

- It uses data from 2011 to project values for 2025 and beyond. Car ownership (and by implication parking demand) has increased by 12% between 2011 and 2021 and the trend is on a steady upward projection. Using 2021 rather than 2011 values the car park provision is undersized already!
- It uses **average** vehicle ownership data to calculate a **maximum** demand figure.
- It equates car journey reduction measures with a reduced need for residential parking. Where is the car to be parked when not in use?

The [Car Parking Management Plan](#) (CPMP) envisages that parking at the New Development will be controlled by a parking permit scheme. Parking will be allocated on a first come first served basis. Both the CPMP and the TA are silent on what the residents of The Development should do in the absence of obtaining a parking permit. The assumption is that they will have to use public car parks as there is no on-street parking.

Inspection of Google Maps shows that The Development will be served by two public car parks: a) the Waitrose Car Park and b) the Campus West Car Park. It can be expected that Waitrose will protect its own customer interests by limiting longer term parking so Campus West will be the nearest car park some 10 minutes walk away. There is limited alternative public parking within 15 minutes of the Development.

Annex BB sets out the public parking in more detail.

The Development will result in a loss of public parking

There are currently 334 public car parking spaces in [Campus West](#) car park and 325 in Campus West, a total of some public 660 spaces. The removal of the Campus East parking and changes to Campus West will result in 490 public spaces. This represents a 25% reduction of the provision of public parking in the Campus Area.

It is anticipated that Campus West will be used by residents of the New Development who are unable to obtain parking permits. The Campus West Transport Assessment did not envisage serious overuse of the upgraded Campus West Car Park but neither did it consider the impact of residents from the New Development needing to park somewhere.

Moving spaces from East to West will require people to walk for an extra few minutes or so to get to the town centre facilities. This will be off putting for those with mobility constraints and single parents with young children.

Fewer flats should be built on the development

In summary:

- A development of any size will result in a loss of public parking near the town.
- The developer has underestimated the future demand of parking in The Development; there are very limited options within 15 minutes walk and so residents will compete with the general public for the reduced provision of public parking.
- The Council will need to consider where residents of the New Development will park their car if they are unable to obtain a parking permit.

This leads to the conclusion that fewer flats should be built on The Development so that the demand for residents' parking can be met within the site boundary.

Visitor parking at The Development

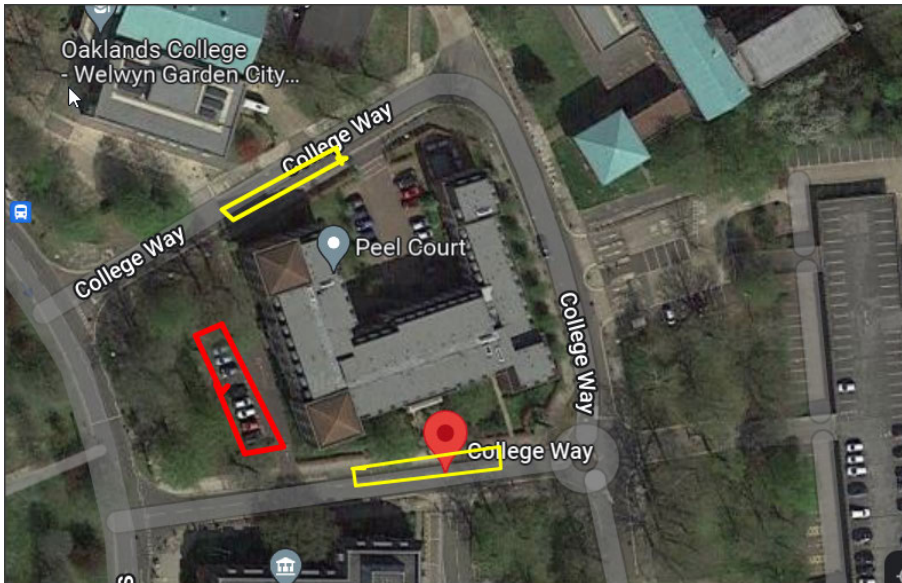
The CPMP:

- Makes provision for very short-term parking for couriers etc.
- Will require all maintenance visits to be pre-booked.
- Is silent on private visitor parking. There is no provision for able-bodied visitor parking on the site; indeed the car park permitting system will make it impractical for ad-hoc visitors to park on the site.
- Refers briefly to nearby on-street parking.

The nearby on-street parking is very limited on the approach roads to the New Development. It comprises a short length to the north of Peel Court which usually can only accommodate 3 cars and a slightly longer length to the south of Peel Court. These are highlighted in yellow in the diagram below. These bays are a 4-7 minute walk from the flats in the New Development. Parking is limited to 1 hour. [REDACTED]; these short-term spaces are often full during the day.

In summary the developer has made no provision for private visitors to The Development containing more than 330 homes.

- Private visitors are a normal part of family life.
- Visitors will thus have to make their own arrangements.
- There are few parking options nearby
- This will have an impact on adjacent properties.



The lack of provision of visitor parking will affect Peel Court

Due to the lack of on-site parking provision for visitors, visitors will have to make their own arrangements. They will put further pressure on the very limited on-street parking. Visitors to The Development using the limited on-street parking will have a total walk time of 10-15 minutes so they will probably use much of the hour available and some will take a chance and overstay. This will affect those making day-time visits to Peel Court who often need to use this parking for a short time as all spaces in Peel Court appear full so it is often necessary to go to Reception to see if a staff slot can be used for an hour or two.

Some visitors to The Development will inevitably take a chance and attempt to park in the Visitor Parking area of Peel Court indicated in red in the diagram above. It can be anticipated that the unmet demand for parking by residents of The Development will result in some of them taking a chance in the evening/night to park in the Peel Court Spaces.

Peel Court does not have a parking permit scheme for the 7 spaces in the visitor car-parking area shown in red. It is not necessary and if implemented would make ad-hoc visiting more difficult than it is now. The lack of a permit scheme makes it difficult to deal with

unauthorised people parking their cars. It may become necessary to install an expensive in/out barrier system to manage a small number of spaces.

Proposal to remedy the impact on immediate neighbours

██████████ not objecting to the provision of some 250 houses on this development.

██████████ is objecting to a development of some 330 homes on this site which has inadequate parking for residents and no provision for parking by private visitors.

When granting permission to this development the council should:

1. reduce the number of permitted flats so that The Development site can accommodate the anticipated future demand for parking; and
2. require the Car Park Management Plan to provide parking for private visitors to The Development.

Your sincerely

██████████

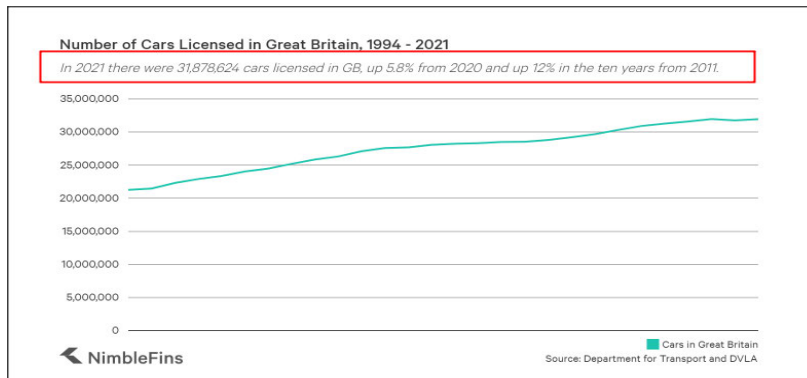
████████████████████ 35 Peel Court Welwyn Garden City AL8 6DG

Annex AA Under assessment of demand for parking

The Transport Assessment (TA) has underestimated the demand for parking by using old 2011 data that has not been corrected for known and publicly available (DVLA) increase in demand.

TA 5.13. car ownership statistics have been obtained from the 2011 LAND AT CAMPUS EAST, WELWYN GARDEN CITY 2007511-11 Census for the "Handside" ward in which the development is situated and is therefore considered representative.

Data from DVLA shows that car ownership has increased by 12% between 2011 and 2021; the trend is upwards; the 2011 data is therefore **not** representative.



<https://www.nimblefins.co.uk/cheap-car-insurance/number-cars-great-britain#:~:text=At%20the%20end%20of%202021,in%20GB%20has%20risen%2039.6%25>

The increase in car ownership from 2011 to 2021 is 12%. Increasing the 168 figure in Section 5.16 by 12% is 188 so the 183 figure in section 5.17 is already too small for 2021!

5.16 Applying this to the proposed 313 units development (consisting of the tenure from Section 4.7) equates to a potential maximum demand of 168 cars.

5.17. With regards to the above information, the proposals seek to provide 183 parking spaces for the 313 residential units

Furthermore the TA has used census data which is an **average** figure to calculate with a **maximum demand**. This is a fundamental error in the use of statistics.

5.16 Applying this to the proposed 313 units development (consisting of the tenure from Section 4.7) equates to a **potential maximum demand** of 168 cars.

Finally the TA equates reducing demand for car journeys to reducing demand for residential car park provision. Whilst many people can change some of their journey choices most people will not give up their car completely so will still need a parking space

The scale of the under-estimate is material and will have long-term consequences. The TA, using old data and quoting average figures for maximum figures, recognises that the car park provision is undersized.

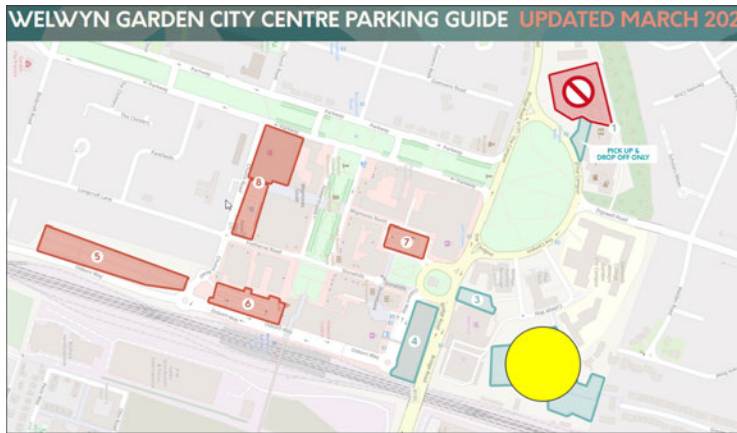
5.17. With regards to the above information;..... it is considered that the below usual minimal standards is appropriate in this instance and will help to minimise demand for travel by private motor vehicle.

In summary the Transport Assessment:

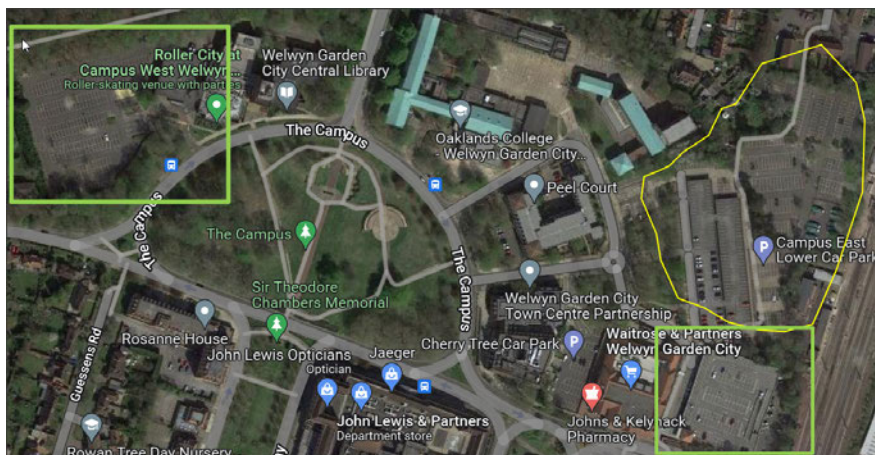
- contains several weaknesses that have resulted in a material underestimate of the demand for parking by residents;
- These weaknesses raise legitimate questions about other parts of the TA.

Annex BB Public Car Park Provision for The Development

Public Parking that might be available to residents of the New Development.



Nearest two public car parks are indicated by green rectangles.



7 minute walking estimate is based on the cinema so will be longer in practice, say 10 minutes

