

16 Corsie Avenue, Perth. PH2 7BS [REDACTED]

24/01/2023

Dear Sir

I refer to planning application [6/2022/2901/MAJ](#). I submitted an objection to The Development on behalf [REDACTED]. I have reviewed the car parking provision for The Development in more detail and wish to raise some concerns.

1. The [Transport Assessment](#) (TA) proposal 183 parking spaces for The Development 313 flats. **This is a reduction of 108 spaces or 37%** on what would have been derived using the The Welwyn Hatfield Supplementary Planning Guidance Parking Standards for a Zone 1 residential development. This is discussed further in Annex AA.
2. The design is based on a standard width parking space of 2.4 metres; this is an outdated standard from the last century. It is well known that 2.4 metres is too narrow. It is thus likely that some spaces will be regularly unusable due the people parking too close to the side of the bay.
3. Some residents can be expected to own/use medium sized vans. There is no provision for parking these on The Development. It does not appear that medium sized vans can be accommodated by on-street parking or using public car parks.

Solutions to these three issues must form part of the planning approval process. To ignore them will result in future problems for the residents of The Development and their neighbours.

The number of flats permitted for the development should be such that anticipated problems of parking are minimised. The number should meet the Council's requirements that "*Residential development will generally be expected to accommodate all parking demand on site*" *Source the introduction to the residential parking section Welwyn Hatfield Parking Guidance (Section 4.1).*

My analysis shows that an appropriate number of flats would be in the range of 230 flats (see Annex BB). This is substantially less than the 331 units proposed by the developer.

I respectfully suggest that The short-term profitability of a development site should not be at the expense of its future residents and neighbours who would have to endure the long-term difficulties caused by a demonstrable under provision of residents parking for 331 flats.

Your sincerely

[REDACTED]

Annex AA

This Annex has four parts

- Part 1 set outs the basis of the methods used to calculate the demand for parking spaces
- Part 2 shows main differences between the two methods
- Part 3 analyses the estimate from the TA
- Part 4 adjusts the Parking Guidance to take account of social housing

Part 1. Parking design methodologies

The Transport Assessment Section 5.13 sets out the principles used for the design of the car parking. It has been bulleted for ease of reference:

1. 5.13. The Welwyn Hatfield “Supplementary Planning Guidance Parking Standards (Adopted 2004)” has been reviewed with regards to on-site parking.
2. It should be noted that the above parking standards are now guidelines rather than minimum/maximum standards.
3. Therefore, car ownership statistics have been obtained from the 2011 Census for the “Handside” ward in which the development is situated and is therefore considered representative.
4. The results for “Flats, maisonette or apartments” for both “Owned: Owned outright with a mortgage or loan” and “Shared Ownership: rented and living rent free” are shown below in Table 5.1.

The “Parking Guidance” states that:

- Residential development will generally be expected to accommodate all parking demand on site
- The level of car parking to be provide on site, however will depend on the accessibility of the site

4. Residential Car Parking Provision

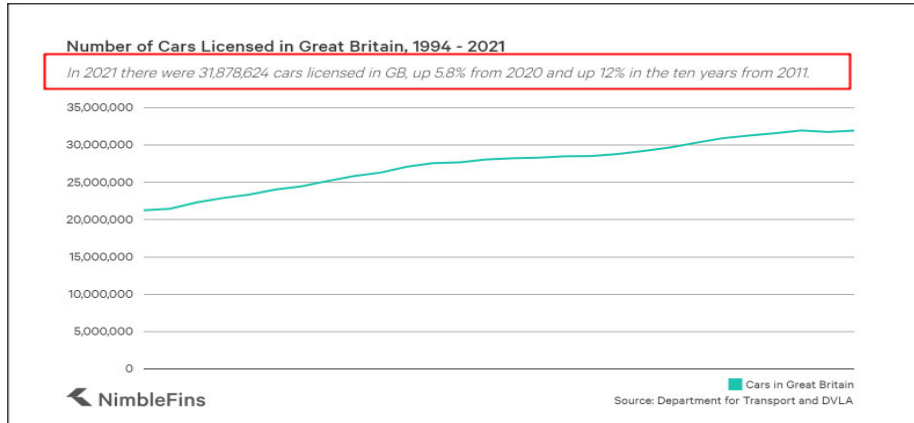
- 4.1 Residential development will generally be expected to accommodate all parking demand on site. The level of car parking to be provided on site, however, will depend on the accessibility of the site.**

Part 2. Differences between the estimation methods

<p>This table uses the number of units set out in the Transport Assessment; and Parking Guidance for the number of parking places for different types of accommodation.</p> <p>Social house is marked with an S</p> <p>The calculation shows a demand of 291 spaces</p>	<table border="1"> <thead> <tr> <th>Beds / Type</th> <th>Units</th> <th>WELHAT C3 Zone1 Standard</th> <th>Based on Std</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>74</td> <td>0.75</td> <td>56</td> </tr> <tr> <td>2</td> <td>131</td> <td>1.00</td> <td>131</td> </tr> <tr> <td>3</td> <td>14</td> <td>1.50</td> <td>21</td> </tr> <tr> <td>1S</td> <td>42</td> <td>0.75</td> <td>32</td> </tr> <tr> <td>2S</td> <td>52</td> <td>1.00</td> <td>52</td> </tr> <tr> <td></td> <td>313</td> <td></td> <td>291</td> </tr> </tbody> </table>	Beds / Type	Units	WELHAT C3 Zone1 Standard	Based on Std	1	74	0.75	56	2	131	1.00	131	3	14	1.50	21	1S	42	0.75	32	2S	52	1.00	52		313		291		
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<p>The TA uses lower values for the number of spaces per unit. The calculation produces a figure of 168</p> <p>The TA proposal is for 183 parking spaces</p> <p>This is a difference of 108 spaces or a reduction of 37%</p> <p>The parking spaces per flat are compared in the next table.</p>	<table border="1"> <thead> <tr> <th>Beds / Type</th> <th>Units</th> <th>2011 Census Average</th> <th>Based on 2011 census</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>74</td> <td>0.58</td> <td>76</td> </tr> <tr> <td>2</td> <td>131</td> <td>0.58</td> <td>9</td> </tr> <tr> <td>3</td> <td>14</td> <td>0.66</td> <td>18</td> </tr> <tr> <td>1S</td> <td>42</td> <td>0.42</td> <td>22</td> </tr> <tr> <td>2S</td> <td>52</td> <td>0.42</td> <td>168</td> </tr> <tr> <td></td> <td>313</td> <td></td> <td></td> </tr> </tbody> </table>	Beds / Type	Units	2011 Census Average	Based on 2011 census	1	74	0.58	76	2	131	0.58	9	3	14	0.66	18	1S	42	0.42	22	2S	52	0.42	168		313				
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<p>The reduction applied in the TA for a 3 bedroomed property is striking. Most people able to purchase a new 3 bedroomed flat will probably have a car.</p> <p>The TA has suggested that 14 three bedroomed properties will only need 9 spaces. The Parking Guidance suggests that 21 spaces are needed.</p>	<table border="1"> <thead> <tr> <th>Beds / Type</th> <th>2011 Census Average</th> <th>WELHAT C3 Zone1 Standard</th> <th>Diff'ce</th> <th>% Reduction</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0.58</td> <td>0.75</td> <td>-0.17</td> <td>-23%</td> </tr> <tr> <td>2</td> <td>0.58</td> <td>1.00</td> <td>-0.42</td> <td>-42%</td> </tr> <tr> <td>3</td> <td>0.66</td> <td>1.50</td> <td>-0.84</td> <td>-56%</td> </tr> <tr> <td>1S</td> <td>0.42</td> <td>0.75</td> <td>-0.33</td> <td>-44%</td> </tr> <tr> <td>2S</td> <td>0.42</td> <td>1.00</td> <td>-0.58</td> <td>-58%</td> </tr> </tbody> </table>	Beds / Type	2011 Census Average	WELHAT C3 Zone1 Standard	Diff'ce	% Reduction	1	0.58	0.75	-0.17	-23%	2	0.58	1.00	-0.42	-42%	3	0.66	1.50	-0.84	-56%	1S	0.42	0.75	-0.33	-44%	2S	0.42	1.00	-0.58	-58%
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Part 3. Analysis of TA estimate

Car ownership has increased year-on-year for decades. Data from DVLA shows that car ownership has increased by 12% between 2011 and 2021 and the trend is upwards.



<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 TA used figures from the 2011 Census. Using the known growth in car ownership (12%) and the TA methodology shows that the number of spaces needed in 2021 was 188. This is larger than the 183 spaces proposed in November 2022. The demand for spaces will increase about 20 per decade assuming a 10% growth per decade.

Beds / Type	Units	2011 Census Average	Based on 2011 census	Car growth to 2021 (+12%)	10% Growth	10% Growth
1	74	0.58	43	48	53	58
2	131	0.58	76	85	94	103
3	14	0.66	9	10	11	13
1S	42	0.42	18	20	22	24
2S	52	0.42	22	24	27	30
	313		168	188	207	227

By 2040 the demand for parking spaces will be circa 227; this is 44 more than the 183 that is proposed in the TA. This is an increase of 24%. It can be seen the TA has significantly underestimated the need for parking spaces.

Part 4. Adjusting the Planning Guidance Estimate

It could be reasonably argued that those in shared or social housing will have low car ownership. This is explored in the table below.

Beds / Type	Units	WELHAT C3 Zone1 Standard	Based on Std	Use 0.42 for social	Remove Social
1	74	0.75	56	56	56
2	131	1.00	131	131	131
3	14	1.50	21	21	21
1S	42	0.75	32	18	0
2S	52	1.00	52	22	0
	313		291	247	208

If no spaces were provided for those in shared or social housing the revised demand using the Parking Guidance would be 208 spaces.

This is far larger than the 183 spaces provided for in the Transport Assessment.

Annex BB How many flats can be built on the site

The Transport Assessment has significantly underestimated the need for parking spaces.

<p>This table shows the number of flats that could be supported by 183 parking spaces with a width of 2.4 metres.</p> <p>It used Planning Guidance for private properties and 0.42 spaces for all shared or social housing. The 0.42 figure is the 2011 census value used in the TA.</p>					
	Beds / Type	Units	Space per flat	Spaces	
	1	55	0.75	41	
	2	97	1.00	97	
	3	10	1.50	16	
	1S	31	0.42	13	
	2S	39	0.42	16	
		232		183	

This provision of parking spaces needs to take the following into consideration:

- It is probable that the reduction in flats would allow more space for parking.
- The design width of the parking space is too small at 2.4 metres, a standard from the last century.
- A width of 2.6 metres is suggested so a larger proportion of area of The Development will be needed for parking.
- My father pointed out the absence of any private visitor parking. Some private visitor parking should be provided on site.

In conclusion, in order to meet the Parking Guidance expectation that The Development should accommodate all parking demand on site then the number of proposed flats should be reduced to about 230.