

## Appendix 13 - REPRESENTATIONS – Local Plan Regulation 18 Preferred Policy Options Consultation – Parking

### Statutory Consultee Representations

REPRESENTATION REFERENCE	REPRESENTOR	YES/ NO	REPRESENTATION	SUMMARY OF REPRESENTATION/MAIN ISSUES RAISED	OFFICER/COUNCIL RESPONSE	OFFICER'S / COUNCIL'S PROPOSED ACTION
<b>Q28. Do you think the Preferred parking is the right approach?</b>						
SC_P1_00008_Home Builders Federation	Home Builders Federation	No	We do not consider that part 1 of the policy to be sound as it states that the parking standards set out in appendix 3 will be preferred until the standards are revised. This implies that the standard could be revised through supplementary guidance and not through a review of this policy. It is not appropriate for policies in a local plan to be amended through supplementary guidance and as such we would suggest that the phrase "until such time that standards are revised" is deleted.	<ul style="list-style-type: none"> <li>Do not consider that part 1 of the policy to be sound as it states that the parking standards set out in appendix 3 will be preferred until the standards are revised. Implies that the standard could be revised through supplementary guidance and not through a review of this policy. It is not appropriate for policies in a local plan to be amended through supplementary guidance and as such we would suggest that the phrase "until such time that standards are revised" is deleted</li> </ul>	Noted.	Refer to HCC car parking standards. <del>delete as suggested.</del>
SC_00020_Chorleywood Parish Council	Chorleywood Parish Council		<ul style="list-style-type: none"> <li>The definition of the minimum size for a standard parking space has not been defined and this should be included in the policy or parking standards.</li> <li>Whilst many of the standards defined are acceptable (see exceptions outlined in the rep) the definition of Sustainability Zones requires refinement as it currently uses a standard straight-line distance measurement without taking account of differences in topology and the quality of the road network for use by pedestrians and cyclists. These factors will have a material impact on the potential for residents to walk or cycle to transport hubs. This needs addressing in the definition of individual Sustainability Zones.</li> <li>Cycle Parking Standards. The standards have been framed using a modal split target of 10% by cycle as a baseline. Bearing in mind the declaration of a Climate Emergency in the district and the need to move to more sustainable methods of travel, this appears to be far too low – particularly considering the relatively small space requirements of cycle parking. It is therefore recommended that the baseline be increased to 25% and all parking standards adjusted in line with this</li> </ul>	<ul style="list-style-type: none"> <li>The definition of the minimum size for a standard parking space has not been defined and this should be included in the policy or parking standards.</li> <li>There is a need to address in the definition individual Sustainability Zones.</li> <li>Cycle Parking Standards. It is therefore recommended that the baseline be increased to 25% and all parking standards adjusted in line with this.</li> </ul>	Noted. Car/ cycle parking standards will be revised in accordance HCC guidance.	Refer to Cycle Parking Guide ( <a href="https://www.hertfordshire.gov.uk/media-library/documents/highways/development-management/section-2-highway-layout-and-strategies-highways-design-guide.pdf">https://www.hertfordshire.gov.uk/media-library/documents/highways/development-management/section-2-highway-layout-and-strategies-highways-design-guide.pdf</a> , page 58)  <i>Document not available HCC have been contacted. Not included in policy at this stage</i>
SC_00023_Croxley Green Parish Council	Croxley Green Parish Council	No	<p>It is not clear whether "development" in policy 28(1) includes extensions and adaptations that increase the number of rooms that could be used as bedrooms. Where the number of potentially usable bedrooms is increased the parking standards should apply, wherever possible, including the requirement to provide for electric vehicles and cycles. Croxley Green Parish Council supports the requirements for active and passive provision for electric vehicles. However, there should be greater consideration of the emerging needs for electric cycles, cycle trailers and cargo cycles and greater provision for all types of cycles in all settings, and particularly residential properties. Both the need for parking provision and for safe storage within the curtilage or nearby.</p> <p>We suggest that there should be explicit consideration of the parking requirements for car clubs and rented vehicles, particularly for flats in class C3. We note the comments from Jed Griffiths' statement about the difficulties of balancing the demand for car parking with support for sustainable transport. In particular we suggest the minimum parking standards for the C3 use class could be increased to: • 1 Bedroom, 1 space (full size) • 2 or 3 bedrooms, 2 spaces (full size) • 4 or more bedrooms, 3 spaces (full size) minimum</p>	<ul style="list-style-type: none"> <li>It is not clear whether "development" in policy 28(1) includes extensions and adaptations that increase the number of rooms that could be used as bedrooms.</li> <li>Support the requirements for active and passive provision for electric vehicles. However, there should be greater consideration of the emerging needs for electric cycles, cycle trailers and cargo cycles and greater provision for all types of cycles in all settings, and particularly residential properties.</li> <li>suggests that there should be explicit consideration of the parking requirements for car clubs and rented vehicles, particularly for flats in class C3 and the minimum parking standards for the C3 use class could be increased.</li> </ul>	Noted. The policy refers to new development schemes.	No action
SC_00024_Abbots Langley PC	Abbots Langley Parish Council	No	Off road parking means more hardstanding and it contravenes the flooding policies, why cannot the proposal for new housing require car pool schemes?	<ul style="list-style-type: none"> <li>See comment</li> </ul>	Noted.	No action

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### Non-Statutory Respondents

REPRESENTATION REFERENCE	REPRESENTOR	YES/NO	REPRESENTATION	SUMMARY OF REPRESENTATION/MAIN ISSUES RAISED	OFFICER/COUNCIL RESPONSE	OFFICER'S/ COUNCIL'S PROPOSED ACTION
P1_00002		Yes	The Correct Approach	<ul style="list-style-type: none"> <li>Noted</li> </ul>	Noted	None
P1_00003		Yes	need also to prevent increases in on-street parking on neighbourhood roads	<ul style="list-style-type: none"> <li>Agree with approach, prevent increase in on-street parking.</li> </ul>	Noted	None
P1_00005		No	I think the requirement for providing electric vehicle charging points should be worded in a stronger way so that they are mandated to be provided (and retain in working order) for all parking spaces.	<ul style="list-style-type: none"> <li>Requirement for providing electric vehicle charging points should be worded in a stronger way</li> </ul>	Noted	None
P1_00006		Yes	Parking is a very sensitive issue locally. Many homes have multiple cars and in such have paved front gardens to provide off street parking. While this facilitates reduction of road parking it has had a detrimental effect of the environment as evidenced by localised flooding (Lancing Way/ Winchester way junction and Barton Way near to the Red Cross Building). Living in the narrowest street in Croxley Green (Winchester Way) and being close to Malvern Way School, we experience issues in this respect. If local transport was enhanced and local children schooled at local schools this would in some way assist this parking issue. New developments must make good provision for adequate parking and not make the current situations worse.	<ul style="list-style-type: none"> <li>Agree with approach;</li> <li>Paved driveways have led to more flooding such as along Lancing Way/ Winchester way junction and Barton Way near to the Red Cross Building;</li> <li>Enhance local transport and local children schooled at local schools to address parking issues;</li> <li>New developments must provide adequate parking and not worsen.</li> </ul>	Noted	None
P1_00014		Yes	This will be interesting. Recent experience has shown parking spaces being removed under the pretext of protecting pedestrians who seldom use the space. Sort out the public transport/bus routes and timetables and less parking will be needed.	<ul style="list-style-type: none"> <li>Improve public transport and the need for less for parking would be reduced</li> </ul>	Noted	None
P1_00015		No	There is no consideration for encouraging shopping/dining/using services e.g. hairdressing in Rickmansworth High Street. I overview the council car park next to M&S and I know that It is only full on Saturday mornings and just before Xmas. The major reason for this has been the charge for stays over 1 hour. 1 hour is not enough time to carry out comfortable shopping without time pressure. Also, a visit to the hairdressers, coffee shop, and clothes shop takes much longer. I appreciate we need to discourage commuter parking, hence I propose that we increase the time for free parking to 3 hours. Businesses I have spoken fully support this.	<ul style="list-style-type: none"> <li>Should not charge for stays over one hour in Rickmansworth centre;</li> <li>Should be free parking for up to 3 hours</li> </ul>	Noted	None
P1_00017		No	Most households have two cars so any allocated or space for parking will not be enough. Demand underground parking facilities in any high density development	<ul style="list-style-type: none"> <li>Households have two cars so not enough parking;</li> <li>Demand underground parking facilities at high density developments</li> </ul>	Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety.	None
P1_00019		Yes		<ul style="list-style-type: none"> <li>No Comment</li> </ul>	Noted	None
P1_00020		Yes	N/A	<ul style="list-style-type: none"> <li>No Comment</li> </ul>	Noted	None
P1_00023		Yes	Ok	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00024		Yes	Parking is a huge problem with a general lack of spaces. Cars parked on the pavement is dangerous for pedestrians and results in congestion as the width of the road narrows, reducing two lanes to one. Consideration needs to be given to visitors and employees as well as residents.	<ul style="list-style-type: none"> <li>Agree with approach;</li> <li>Cars parked on footpath is dangerous;</li> <li>Consider visitor and employee as well as residents parking</li> </ul>	Noted	None
P1_00025		No	Less housing require less cars	<ul style="list-style-type: none"> <li>Less housing requires less cars</li> </ul>	Noted	None
P1_00026		No	Reference to resolving potential parking disputes between existing and new residents.	<ul style="list-style-type: none"> <li>Resolve parking disputes between existing and new residents.</li> </ul>	Noted	None
P1_00028		Not Specified	This is very unambitious and reactive. Where is the ambition to reduce parking? To allocate zones in which car ownership is not permitted? To facilitate shared parking away from residences? To introduce Low Traffic Neighbourhoods?	<ul style="list-style-type: none"> <li>Policy is not ambitious enough to reduce parking;</li> <li>Ideas include zones where car ownership is not permitted, shared parking away from residences, or Low Traffic Neighbourhoods.</li> </ul>	Noted	None
P1_00028		Yes	yes but ensure new developments do not mean cars overflowing onto street	<ul style="list-style-type: none"> <li>Agree with approach, ensure does not lead to cars parking on neighbouring streets.</li> </ul>	Noted	None
P1_00032		Yes	It's the right approach	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00033		Yes	There should be a minimum of 30% of car parking to have an electric charging point.	<ul style="list-style-type: none"> <li>Minimum of 30% car parking should have electric charging points.</li> </ul>	Noted	None
P1_00034		Yes	No Comment	<ul style="list-style-type: none"> <li>No Objection</li> </ul>	Noted	None
P1_00035_		Not Specified	Look at parking in the town - bring back free parking for 2 hours everywhere to help rejuvenation	<ul style="list-style-type: none"> <li>Bring back free 2 hour parking to rejuvenate the town.</li> </ul>	Noted	None

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P1_00038		Yes	There must be parking, but also other facilities such as good affordable transport and cycling parking to discourage the use of cars.	<ul style="list-style-type: none"> <li>Agree with approach;</li> <li>Need parking, also affordable transport and cycling to discourage cars</li> </ul>	Noted	None
P1_00040		No	Under no circumstances should any building take part on green places. The only building I would support is on brownfield sites - that is places where there has already got buildings.	<ul style="list-style-type: none"> <li>Do not develop Green Belt Land</li> </ul>	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	None
P1_00041		No	Reducing the number of parking spaces will not reduce the number of cars in an area.	<ul style="list-style-type: none"> <li>Reducing car parking spaces will not reduce number of cars</li> </ul>	Noted	None
P1_00045		No	I would favour a more aggressive stance in line with recommendations from national campaign groups. Limiting parking on new developments is a key way to control car use.	<ul style="list-style-type: none"> <li>Need a more aggressive stance in line with national campaign groups;</li> <li>Limiting parking on new developments is a key way to control car use.</li> </ul>	Noted	None
P1_00046		Yes	Controlled parking zones are necessary near stations	<ul style="list-style-type: none"> <li>Controlled parking zones necessary near stations.</li> </ul>	Noted	None
P1_00047		Yes	This policy is right.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00048		Yes	Sufficient parking should be provided for new developments - recent developments do not have sufficient park and this causes over-flow parking on roads. Standards need to be reviewed. Controlled parking zones should not be used by councils to generate income.	<ul style="list-style-type: none"> <li>Need Sufficient parking at for new developments;</li> <li>Not enough parking at recent developments causes parking on roads.</li> <li>Standards need to be reviewed.</li> </ul>	Noted	None
P1_00049		Yes	No Comment	<ul style="list-style-type: none"> <li>No Comment</li> </ul>	Noted	None
P1_00053		Yes	Yes	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00054		Yes	As a whole this right but considering how poor public transport is it difficult for people to give up car ownership	<ul style="list-style-type: none"> <li>Agree with approach;</li> <li>With poor public transport in the area people will not give up their cars.</li> </ul>	Noted	None
P1_00055		Yes	Traffic and parking a real problem in this area	<ul style="list-style-type: none"> <li>Agree with approach;</li> <li>Traffic and parking real problem in the area.</li> </ul>	Noted	None
P1_00056		Yes	Local communities will continue to be dependent on cars for the foreseeable future, even if they may be powered differently. The need to park them at / near the place of dwelling and as part of travelling elsewhere cannot be disregarded without severe impact on local areas (everywhere).	<ul style="list-style-type: none"> <li>Local communities will continue to depend on cars and need adequate parking.</li> </ul>	Noted	None
P1_00057		No	Existing high levels of car ownership. Would cause congestion.	<ul style="list-style-type: none"> <li>Existing high levels of car ownership would cause congestion.</li> </ul>	Noted	None
P1_00063		Yes	Agree	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00064		Yes	xxx	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00066		No	You must ensure there are enough parking spaces per development per house e.g. a 3 bedroom house should have a minimum of 2 car parking spaces. If not we will end up like the development in Apsley were it is impossible to get through because people are parking on both pavements leaving a single track. There is no point in putting yellow lines as these will be ignored. There is also not enough parking in all villages at the moment so where are all the additional cars meant to go, forget electric cars due to the price addition to a normal car. As today there is already insufficient parking in the whole area you above does not give any real thoughts on how to restrict the amount of cars and were any additional cars are going to park. The above does not include the terrible added pollution to the area and the obvious extra health problems this will create which will lead to the need of more medical facilities in the area as already these are all to overstretched	<ul style="list-style-type: none"> <li>Ensure enough spaces per development;</li> <li>If not will have situation with like Apsley where people park on pavement making access difficult;</li> <li>This also creates pollution and health problems with already overstretched infrastructure.</li> </ul>	Noted	None

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P1_00068		No	The future is uncertain - not enough thought has been devoted to change.	<ul style="list-style-type: none"> <li>Future is uncertain and not enough thought given to adopt to change.</li> </ul>	Noted	None
P1_00069		No		<ul style="list-style-type: none"> <li>No Comment</li> </ul>	Noted	None
P1_00074			Yes but the ideas proposed affect the whole area not just new developments, changing residents and visitors habits will be a challenge and require considerable consultation and leadership.	<ul style="list-style-type: none"> <li>Changing residents/ visitors habits will be a challenge and require considerable consultation and leadership.</li> </ul>	Noted	None
P1_00076		Yes	Electric car charging should be a necessity for every new property built. The change from petrol to electric is going to happen rapidly.	<ul style="list-style-type: none"> <li>Need electric car charging for every development built.</li> </ul>	Noted	None
P1_00078		Yes	Parking is already in high demand and the need to charge an increasing number of electric cars under current policies is also an increasing requirement.	<ul style="list-style-type: none"> <li>Agree with approach. Need more electric vehicle parking</li> </ul>	Noted	None
P1_00080		No	Building more car parking spaces I don't get	<ul style="list-style-type: none"> <li>Do not agree with approach.</li> </ul>	Noted	None
P1_00084		Yes	Although I think every new house or building should have adequate parking to support the residents as we have limited parking in Chorleywood already. We need permits and yellow lines for residents as their visitors as a priority.	<ul style="list-style-type: none"> <li>Agree with approach. Need permits and yellow lines in Chorleywood as soon as possible.</li> </ul>	Noted	None
P1_00086		No	Build some houses without parking! There must be people who don't use cars! so many huge driveways with 4 or more cars on. we must try to reduce this	<ul style="list-style-type: none"> <li>Build houses without parking, as so many houses with driveways with four cars on.</li> </ul>	Noted	None
P1_00088		No	Once again no reference above to residents who need vehicles for work. Plumbers, Electricians, builders, one man/woman business doing DIY. Gardeners/dog walkers all of these jobs have equipment to take to customer. Not to mention all the delivery drivers and taxis drivers.	<ul style="list-style-type: none"> <li>No reference to those whom need vehicles for work as well as needed for customer parking</li> </ul>	Noted	None
P1_00089		Yes	We need to understand where this 20% of unallocated parking would go? We as residents need to be protected so we are able to park without 'threat' of attack by commuters parking 12hrs a day, this has already happened in our road Greenbury Close where several commuters have parked without due care or thought for those living here. They feel they are 'entitled' to park, making residents not able to access driveways or parking too close to neighbouring cars or verbal abuse. This is not acceptable and it should be addressed by the council to make residents feel safe in their homes and also to give them freedom to park outside their houses. We also have lots of elderly residents that require carers, ambulances and to keep our green clear so visitors can visit. We have already put in a separate application to the TRDC to look into this matter and filled out a neighbourhood view on parking (we currently have 1hr yellow line around the main road) but the green in the middle needs another yellow line or permit parking like most roads in Chorleywood.	<ul style="list-style-type: none"> <li>Understand what 20% of unallocated parking would go;</li> <li>Commuters park without care, such as at Greenbury Close;</li> <li>Lots of elderly residents that require carers, ambulances and to keep our green clear so visitors can visit;</li> <li>Already put in separate application to TRDC to look into this matter and filled out a neighbourhood view on parking, need double yellow lines.</li> </ul>	Noted	None
P1_00096		Yes	Seems Sensible	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00097		Yes	There should be parking allocated for all new dwellings. Parking for commuters is limited to the station car park because all other parking in Chorleywood is of limited time duration.	<ul style="list-style-type: none"> <li>Agree with approach</li> <li>Parking for commuters is limited to the station car park</li> </ul>	Noted	None
P1_00098		Yes	Stop	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00099_ A Michaels (councillor)	A Michaels (councillor)	Yes	Yes	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00102		Yes	N/A	<ul style="list-style-type: none"> <li>No Comment</li> </ul>	Noted	None
P1_00106		No	Lots of free parking in the area already disappeared with development of new flats, parking becoming more and more difficult.	<ul style="list-style-type: none"> <li>Free parking in area has disappeared with development of new flats, parking becoming more and more difficult.</li> </ul>	Noted	None
P1_00107		Yes	..provided that any CPZs are policed properly. Also that any vehicle charging point aren't concentrated in any particular place in residential areas.	<ul style="list-style-type: none"> <li>Agree with approach provided CPZ's are policed properly;</li> <li>Ensure vehicle charging points not put in a particular place in residential area.</li> </ul>	Noted	None
P1_00108		No	How can someone living in a flat not deserve a parking spot? Parking for everyone. More electric charging areas	<ul style="list-style-type: none"> <li>Need parking for everyone, including those living in a flat;</li> <li>Need more electric charging points.</li> </ul>	Noted	None
P1_00110_ CPRE Herts		Not Specified	High provision parking regimes reduce density and hamper good design and greater weight should be given to sustainable transport funding options. The Local Plan should anticipate the growing role and impacts of e-bikes and e-scooters with new infrastructure and parking and charging provisions ideally within the dwelling footprint. High car ownership is a financial burden on poorer families so there is a social benefit to reducing dependency which should be recognised in the Local Plan. Reduced car ownership and parking provision allows for greater urban greening and more attractive places. Section 106 funds could be pooled to provide settlement wide 'sustainable travel funds' that promote and support sustainable travel via subsidised public transport fares, cycling or car clubs. The Council should consider mechanisms such as parking levies to raise sustainable travel funds to support low car or car free developments with ongoing sustainable travel allowances for residents.	<ul style="list-style-type: none"> <li>Local Plan should recognise growing role/ impact of e-bikes and e-scooters;</li> <li>High car ownership is financial burden so there is a social benefit to reducing dependency;</li> <li>Section 106 funds could be used to provide 'sustainable travel funds' that promote sustainable travel via reduced fares, cycling or car clubs.</li> <li>Have parking levies to raise funds to support low/car free developments</li> </ul>	Noted	None
P1_00112		No	There are examples all over the county of inadequate parking and the problems it causes. You only have to look around. It's not rocket science.	<ul style="list-style-type: none"> <li>Examples around the country of inadequate parking and problems it causes.</li> </ul>	Noted	None
P1_00113		Yes	No reason	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None

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P1_00114		Yes	concur - higher emphasis on electric charging as an integral design consideration	<ul style="list-style-type: none"> <li>Agree with approach. Electric vehicle charging an integral design consideration.</li> </ul>	Noted	None
P1_00116		Yes	I agree with the policy as stated	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00117		Yes	Fine	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00119		No	This land is a sanctuary for horses, plants, trees, wildlife and local people. This area has been developed enough and the local infrastructure will not be able to support yet more housing.	<ul style="list-style-type: none"> <li>Land is sanctuary for wildlife</li> </ul>	Infrastructure requirements will be identified in the Infrastructure Delivery Plan. If such works require planning permission, they will be required to submit an application which will be considered on its merits and whether the proposals would have an acceptable or unacceptable impact on the environment. Requirement for a net gain in biodiversity would be applied. Policies provide for the retention of trees and hedgerows where possible and replanting.	None
P1_00120		Yes	Seems sensible.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00121		Yes	Forget the greenbelt - find alternatives	<ul style="list-style-type: none"> <li>Do not develop Green Belt Land</li> </ul>	Noted	None
P1_00122		No	I believe parking standards have been inadequate for the actual levels of car ownership in new residential developments. As a result, the completion of large-scale schemes has been followed by multiple problems of congestion and road safety. We therefore suggest that the proposed standards for the C3 Use Class are too low and too complicated. The minimum per dwelling standards should be raised as follows: 1 bedroom dwellings-1 space; 2 & 3 bedroom - 2 spaces; 4 or more bedroom -3 spaces.	<ul style="list-style-type: none"> <li>Parking levels are inadequate for actual levels of ownership;</li> <li>Suggest the following standards 1 bedroom dwellings-1 space; 2 &amp; 3 bedroom - 2 spaces; 4 or more bedroom -3 spaces.</li> </ul>	Noted	None
P1_00123		Yes	Sadly this is the word we are living in	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00127		No	If you are developing property not with adequate public transport provisions, greater car parking should be permitted.	<ul style="list-style-type: none"> <li>If developing property with inadequate public transport provision, greater car parking should be permitted.</li> </ul>	Noted	None
P1_00130		Yes	It is	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00131		No	Appendix 3 is a joke. Someone needs to do a proper survey of actual car numbers per property. They need to also look at weekend parking requirements for C3 Residential - that's when people visit their elderly relatives and they don't come is 1/4 of a car!!! And who is the idiot who put together the 'Electric Vehicle Standards' section of App. 3? It doesn't even mention the power output required from the charging points! And as to the blanket figure of 20% - that's not exactly going to future proof us for when all cars etc. are electric? So much for planning for the future.	<ul style="list-style-type: none"> <li>Need to look at weekend parking, especially the ¼ car reference;</li> <li>Electric vehicle Parking Standards does not cover the power output requirements. Just have a blanket figure of 20%, not high enough.</li> </ul>	Noted	None
P1_00132		Yes	balanced approach is best	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00133		Not Stat ed	Parking Zones are in some cases cross District Boundaries. It is important to use the duty to co-operate to secure complete zones that span administrative borders. The requirement to provide off street parking is not sufficient having regard to the level of car ownership/use and also the need to 'go electric' and have off street charging. See comments on Appendix 3 below.	<ul style="list-style-type: none"> <li>Use duty to co-operate to secure complete zones that span borders;</li> <li>Off street parking not sufficient regarding level of car ownership/use</li> </ul>	Noted	None
P1_00135		No	Private car ownership should be discouraged especially for very wealthy people who drive stupid great cars that are really for off road use and they only go to Waitrose in them. Less SUVs means less parking necessary	<ul style="list-style-type: none"> <li>Private car ownership should be discouraged to discourage SUV's which take up too much parking space.</li> </ul>	Noted	None
P1_00137		No	All the above I feel are not realistic as many families are multi car owners, so where are all these cars going to park? Parking in Chorleywood continues to be a problem, not only for the residents but also made more difficult when people outside the area park their cars in the station car park to take the train.	<ul style="list-style-type: none"> <li>Many families are multi car owners, so where are all these cars going to park;</li> <li>Parking in Chorleywood continues to be a problem,</li> </ul>	Noted	None
P1_00140		Yes	Agree	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00142		No	.	<ul style="list-style-type: none"> <li>No Comment</li> </ul>	Noted	None
P1_00144		Yes	It can work.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00147		Yes	We need to encourage people to look at alternatives to multiple cars	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00148		Yes	People need to travel	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00150		No	Parking is a key issue for residents and the more new dwellings that are built, the more cars will be introduced into the area. Three Rivers District is an expensive area in which to live with high house prices. In order to afford high house prices, most households will have at least two wage earners in order to afford to live in the area. Invariably, the wage earners will each need a car to get to work or take children to school, so this means that that despite aspirations to place developments in areas close to public transport facilities, car ownership is still a necessity. Accordingly, car parking spaces are a necessity.	<ul style="list-style-type: none"> <li>Car parking is a necessity</li> </ul>	Noted	None
P1_00155		Yes	Including facility for electric car charging is important for the future.	<ul style="list-style-type: none"> <li>Agree with approach, including electric charging facility is important.</li> </ul>	Noted	None
P1_00157		No	See below	<ul style="list-style-type: none"> <li>Do not agree with approach</li> </ul>	Noted	None
P1_00160		Not Stat ed	1) TRDC recognises that car ownership in the District is high, above the Hertfordshire and England average. There is a high dependency on the car, particularly in rural parts of the District. However car parking standards provision for properties outside sustainability Zones 1 and 2 (i.e. in these rural areas) are low in comparison with average car ownership. With the introduction of electric	<ul style="list-style-type: none"> <li>Car parking standards provision for properties outside sustainability Zones 1 and 2 (i.e. in these rural areas) are low in comparison with average car ownership.</li> </ul>	Noted	None

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			cars (zero emissions) and a Government proposed ban on the sale of petrol and diesel cars post 2030, these poor standards are unnecessary and lead to congestion on the roads and hazardous conditions for bike riders and pedestrians alike.			
P1_00162		No	Every house should have an electric car charging point and plenty more at free carparks and recreation areas	<ul style="list-style-type: none"> <li>Every house should have an electric car charging point.</li> </ul>	Noted	None
P1_00166		Yes	N/A	<ul style="list-style-type: none"> <li>No Comment</li> </ul>	Noted	None
P1_00170		No	Chorleywood only has a good tube/train service into Central London, hence it is a favoured location for commuters. There is no direct tube service to Watford, even though there is a line in existence, and even the change at Moor Park option ends in a housing estate and not in the town centre. There are virtually no transport links to the rest of the facilities provided by TRDC. As an example how does one get from Chorleywood to the William Penn Leisure Centre without a car? All new developments should have off-street parking facilities, at a ratio of 1 + 1 per bedroom.	<ul style="list-style-type: none"> <li>Virtually no transport links to rest of the facilities provided by TRDC e.g. getting from Chorleywood to William Penn Leisure Centre with no car?</li> <li>New developments should have off-street parking facilities, at ratio of 1 + 1 per bedroom.</li> </ul>	Noted	None
P1_00174		Yes	Yes agree with this - and the inclusion of electric car charging points. Can these be "required" rather than only "encouraged"?	<ul style="list-style-type: none"> <li>Agree with approach;</li> <li>Inclusion of electric car charging points should be required not encouraged</li> </ul>	Noted	None
P1_00181_ Chiltern Society	Chiltern Society	Not Specified	This broadly covers what we would expect.	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00183		No	All housing needs parking otherwise people park in other neighbourhood areas, on pavements, right on corners etc.	<ul style="list-style-type: none"> <li>All housing needs parking in other neighbourhood areas</li> </ul>	Noted	None
P1_00184		No	It is not clear whether "development" in policy 28(1) includes extensions and adaptations that increase the number of rooms that could be used as bedrooms. Where the number of potentially usable bedrooms is increased the parking standards should apply in full where possible, including the requirement to provide for electric vehicles and cycles.	<ul style="list-style-type: none"> <li>Not clear whether development includes extensions and adaptations;</li> <li>Where number of bedrooms increases, parking standards should apply in full.</li> </ul>	Noted	None
P1_00186		No	Parking is a consistent challenge in Rickmansworth. It is expensive and therefore a barrier to work	<ul style="list-style-type: none"> <li>Parking is a consistent challenge in Rickmansworth. Expensive and therefore a barrier to work.</li> </ul>	Noted	None
P1_00187		No	It is not clear whether "development" in policy 28(1) includes extensions and adaptations that increase the number of rooms that could be used as bedrooms. Where the number of potentially usable bedrooms is increased the parking standards should apply in full where possible, including the requirement to provide for electric vehicles and cycles.	<ul style="list-style-type: none"> <li>Not clear whether development includes extensions and adaptations;</li> <li>Where number of bedrooms increases, parking standards should apply in full.</li> </ul>	Noted	None
P1_00190		No	Not enough spaces are allocated to house owners.	<ul style="list-style-type: none"> <li>Not enough spaces allocated to home owners</li> </ul>	Noted	None
P1_00191		Yes	supports downward pressure on car usage	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00201		Yes	It's right but will only encourage people to own cars and cause more vehicles on the roads	<ul style="list-style-type: none"> <li>Agree with approach but will only encourage people to use own cars.</li> </ul>	Noted	None
P1_00206		No	What is the expectation for Three Rivers on the number of cars per household, and is this being taken into account for new developments? Red Lion Lane (kings Langley/Nash mills) is an example of disastrous building with a poorly planned adjacent car park. The road is almost blocked due to cars parked on the side of the street, as well as blocking pavements. This is a frequent occurrence in new build areas where priority is given to building as many houses in a space as possible.	<ul style="list-style-type: none"> <li>Not clear expectation of TRDC is for car parking per household and taken into account for new developments;</li> <li>Red Lion Lane (kings Langley/Nash mills) example of disastrous building with poorly planned adjacent car park.</li> </ul>	Noted	None
P1_00209		Yes	BUT there are constant issues with commercial vehicles being parked in residential areas, people running car 'dealerships' from local car parks. None of which have been addressed by local councillors.	<ul style="list-style-type: none"> <li>Constant issues with commercial vehicles parked in residential areas, people running car 'dealerships' from local car parks.</li> </ul>	Noted	None
P1_00211		Yes	No Comment	<ul style="list-style-type: none"> <li>No Comment</li> </ul>	Noted	None
P1_00215		No	If you are looking to build new houses. Look to build parking under the properties. Look at how local transport can be made more accessible and affordable.	<ul style="list-style-type: none"> <li>Build parking under the properties;</li> <li>Look at how local transport can be more accessible/ affordable</li> </ul>	Noted	None
P1_00218		Yes	New developments should be built to be without individual cars, but instead a car club approach, so that the parking is centralised, not at the front door. Villages are likely to move to this model, with the use of car clubs in village car parks, and the Uber approach to car ownership and mobility becoming more common.	<ul style="list-style-type: none"> <li>New developments should be built without individual cars. Villages are likely to move to this model, with the use of car clubs in village car parks,</li> </ul>	Noted	None
P1_00219		No	ALL new development should include 100% off street parking. The imposition of permit parking is nothing more than a covert tax and must be seen as such. This policy is no more than "Pipe Dream" conversation.	<ul style="list-style-type: none"> <li>ALL new development should include 100% off street parking;</li> <li>Imposition of permit parking is nothing more than a covert tax</li> </ul>	Noted	None
P1_00220_ Moor Park Residents Association	Moor Park Residents Association	Not stated	1. The Associations recognise that this is one of the most difficult policy areas for the Council to deal with. In setting standards, local planning authorities have to balance a number of conflicting factors, as listed in paragraph 12.26. For Three Rivers the most significant issue is the level of car ownership and usage – in some parts of the District these levels are among the highest in the country. Yet there is a need to adopt policies and set standards which on the one hand provide adequate levels of parking and on	<ul style="list-style-type: none"> <li>Agree with approach;</li> <li>The policy should include a definition of the minimum size for a standard car parking space. It is recommended that a standard minimum of 5500 x 3200mm be used (based on the average size of an MPV or SUV).</li> </ul>	Noted	None

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			<p>the other hand reduce pressures on the transport network and the environment.</p> <p>2. Given the geographical characteristics of the District and its high levels of car usage, the Associations consider that the policies in Preferred Policy Option 28 can generally be found sound. The continuance of the differential parking zones around town centres and railway stations is supported. It is suggested, however, that the policy should include a definition of the minimum size for a standard car parking space. It is recommended that a standard minimum of 5500 x 3200mm be used (based on the average size of an MPV or SUV). That said, there is clearly an aim in policy to provide adequate parking, whilst at the same time reducing the problems of caused by on-street parking which were identified at the previous consultation on the Local Plan. In that respect, the wording of paragraph (3) is particularly important, although the reasoning for the 20% figure in paragraph (2) may be challengeable. The key to the delivery of these policies lies in the Parking Standards which are adopted by the Council.</p> <p>3. The Associations have given careful consideration to the proposed Parking Standards in the Appendix. It is noted that the standards have largely been taken from the adopted Local Plan 2011-2026 and updated, particularly in accordance with the many changes to the Use Classes Order. Nevertheless, it would appear that the Council are satisfied with the application of the standards in the past ten years. It is noted that the new standards will continue to include the Sustainability Zones around railway stations and shopping centres, to restrain car parking in areas of high public transport use. The Associations support this aspect of policy, as well as the introduction of a section on electric-vehicle charging points.</p> <p>4. The Associations have no comments to make on the very detailed aspects of the standards which are applied comprehensively to all the use classes. Comments are confined to the standards to be applied to applications for residential development (Use Class C3). In setting the standards, the Council will need to have regard to the policy guidelines which are set out in the NPPF 2021, paragraph 107, as follows:</p> <p><i>“In setting local parking standards for residential and non-residential development, policies should take into account:</i></p> <p><i>(a) the accessibility of the development;</i></p> <p><i>(b) the type, mix, and use of the development;</i></p> <p><i>(c) the availability and use of public transport;</i></p> <p><i>(d) local car ownership levels; and</i></p> <p><i>(e) the need to ensure an adequate provision of spaces for charging plug-in and other ultralow-emission vehicles.</i></p> <p>5. The NPPF guidelines are particularly apt to Three Rivers. Despite the application of the C3 car parking standards in the adopted Local Plan, there have been increasing problems associated with on-street parking. Although many of these issues may have been caused by increases in car ownership, the Associations believe that the standards have been inadequate for the actual levels of car ownership in new residential developments. As a result, the completion of large-scale schemes has been followed by multiple problems of congestion and road safety. There has often been inadequate provision of spaces for visitors as well as commercial vehicles. This compounds the stress experienced by local residents – these issues should be addressed in the New Local Plan. Changes of offices and shops to residential use, particularly in town centres, may also compound the problems in the future.</p> <p>6. In view of these issues, it is suggested that the proposed standards for the C3 Use Class are too low and too complicated. The Associations propose that the standards should be raised as follows:</p> <table border="0"> <tr> <td>1 bedroom dwellings</td> <td>1 space per dwelling <b>minimum</b></td> </tr> <tr> <td>2 &amp; 3 bedroom dwellings</td> <td>2 spaces per dwelling <b>minimum</b></td> </tr> <tr> <td>4 or more bedroom dwellings</td> <td>3 spaces per dwelling <b>minimum</b></td> </tr> </table>	1 bedroom dwellings	1 space per dwelling <b>minimum</b>	2 & 3 bedroom dwellings	2 spaces per dwelling <b>minimum</b>	4 or more bedroom dwellings	3 spaces per dwelling <b>minimum</b>	<ul style="list-style-type: none"> <li>Suggest a raising of the car parking standards</li> </ul>		
1 bedroom dwellings	1 space per dwelling <b>minimum</b>											
2 & 3 bedroom dwellings	2 spaces per dwelling <b>minimum</b>											
4 or more bedroom dwellings	3 spaces per dwelling <b>minimum</b>											
P1_00221	Not stated	<p>Parking standards have been inadequate for the actual levels of car ownership .As a result, the completion of large-scale projects has been followed by multiple problems of congestion and road safety. The current standards are too low and complicated and should be raised as follows; - 1 bed- 1 space; 2 &amp; 3 beds- 2 spaces; 4 or more beds-3 spaces.</p>	<ul style="list-style-type: none"> <li>Parking standards are inadequate for actual levels of car ownership.</li> <li>Standards are too low and should be raised.</li> </ul>	Noted	None							

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P1_00222_Three Rivers Green Party	Three Rivers Green Party	Yes	No Comments	<ul style="list-style-type: none"> <li>No Comment</li> </ul>	Noted	None																
P1_00223		No	This is fine but bear in mind most homes have two or more cars and this needs to be taken into consideration. Also, there needs to be an increase in bus services in some areas to provide an adequate alternative to cars.	<ul style="list-style-type: none"> <li>Take into consideration have two or more cars needs to be taken into consideration</li> </ul>	Noted	None																
P1_00224		Yes	It seems in order	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None																
P1_00227		No	It is not clear whether development in policy 28(1) includes extensions and adaptations that increase the number of rooms that could be used as bedrooms. Where the number of potentially usable bedrooms is increased the parking standards should apply, wherever possible, including the requirement to provide for electric vehicles and cycles.	<ul style="list-style-type: none"> <li>Not clear whether development includes extensions and adaptations;</li> <li>Where number of bedrooms increases, parking standards should apply in full.</li> </ul>	Noted	None																
P1_00232		Yes	All Good	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None																
P1_00233		Yes	I agree that the Preferred Policy Option for Parking is the right approach. However would like to note that residential parking permits should only be considered after a traffic assessment and local consultation has taken place, and as a last resort.	<ul style="list-style-type: none"> <li>Agree with approach;</li> <li>Only consider parking permits as a last resort after a traffic assessment and local consultation has taken place.</li> </ul>	Noted	None																
P1_00234		Yes	I agree that the Preferred Policy Option for Parking is the right approach. However would like to note that residential parking permits should only be considered after a traffic assessment and local consultation has taken place, and as a last resort.	<ul style="list-style-type: none"> <li>Agree with approach;</li> <li>Only consider parking permits as a last resort after a traffic assessment and local consultation has taken place.</li> </ul>	Noted	None																
P1_00235		No	The proposed parking bays/residents permits for Shepherds way are a bad idea. I have looked every day for the last two months at the cars parked on Shepherds Way and there are usually about 5 parked on street above West Way. For the rest of the street there are occasional cars, most of which I recognise as residents or tradesmen, in total about 6 to 10. This does not constitute a problem and the imposition of permits is just a money making scheme	<ul style="list-style-type: none"> <li>Proposed parking bays/residents permits for Shepherds a bad idea as completely underutilised.</li> </ul>	Noted	None																
P1_00236		Yes	It is critical that there is a mandate for reducing the number of cars parking on the highways	<ul style="list-style-type: none"> <li>Agree with approach. Crucial is a mandate for reducing number of cars parked on highway.</li> </ul>	Noted	None																
P1_00240		Yes	Yes	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None																
P1_00244		No	There simply need to be less private cars. A vastly increased public transport system will help to achieve this. I do welcome car clubbing as a proposal - but how would it work?	<ul style="list-style-type: none"> <li>Needs to be less private cars;</li> <li>Welcome car clubbing but query whether this will work.</li> </ul>	Noted	None																
P1_00252		Yes	The allocation of parking is a big issue. Car ownership is going to increase whatever happens so adequate allocation for car parking on new housing developments and the impact it will cause is not only necessary but vital if harmony is local communities is to be maintained.	<ul style="list-style-type: none"> <li>Car ownership going to increase whatever happens so adequate allocation for car parking on new housing developments is vital.</li> </ul>	Noted	None																
P1_00254_Planning Bureau Ltd	Planning Bureau Ltd	Not Stated	<p>The Council's commitment to sustainable transport modes is commendable. The Council's proposed parking standards are not detailed in the wording of Policy 27 but rather are detailed in Appendix 3 of the Local Plan. The parking requirement for specialist older persons' housing are summarised in the table below:</p> <table border="1"> <thead> <tr> <th>Development Type</th> <th>Car Parking Standards</th> <th>Cycle Parking Standards</th> <th>Electric C</th> </tr> </thead> <tbody> <tr> <td>Retirement dwellings with no warden control (Category 1) -</td> <td>1.5 spaces per unit including 0.25 visitor space.</td> <td>1 short-term space per 3 units plus 1 long-term space per 5 units</td> <td>20% of all provision, to be pass</td> </tr> <tr> <td>Sheltered dwellings with warden control (Category 2)</td> <td>0.75 spaces per unit including 0.25 visitor space.</td> <td>1 short-term space per 3 units plus 1 long-term space per 5 units</td> <td>20% of all provision, to be pass</td> </tr> <tr> <td>Elderly persons residential and nursing homes</td> <td>0.25 spaces per resident bed space plus; 1 space per 2 staff non-resident (parking for resident staff to be based on generals need standard).</td> <td>1 short-term space per 20 beds plus 1 long-term space per 10 staff on duty at any one time.</td> <td>20% of all provision, spaces provision.</td> </tr> </tbody> </table> <p><b>Car Parking</b> McCarthy Stone and Churchill Retirement Living have unrivalled experience in developing retirement housing for the elderly, having implemented well over 1000 Category II sheltered housing developments throughout England, Scotland and Wales. Whilst we appreciate the parking standard for specialist older persons' housing are lower than the requirement for 'general needs' housing, we are strongly of the view that the standards currently proposed would constitute overprovision of parking provision. Retirement Living (Category II sheltered housing) has been defined as "grouped flatlets to meet the needs of the less active elderly people". The key wording here is "less active elderly people", although residents are not normally so frail as to be wholly inactive. Based on survey work it was found that the average age of entry to the respondent's developments is 76 years. It has been found that, of those residents who have given up car ownership, as the majority eventually will, a very significant proportion, of about 18%, do so at, or close to, the time that they enter this form of housing.</p>	Development Type	Car Parking Standards	Cycle Parking Standards	Electric C	Retirement dwellings with no warden control (Category 1) -	1.5 spaces per unit including 0.25 visitor space.	1 short-term space per 3 units plus 1 long-term space per 5 units	20% of all provision, to be pass	Sheltered dwellings with warden control (Category 2)	0.75 spaces per unit including 0.25 visitor space.	1 short-term space per 3 units plus 1 long-term space per 5 units	20% of all provision, to be pass	Elderly persons residential and nursing homes	0.25 spaces per resident bed space plus; 1 space per 2 staff non-resident (parking for resident staff to be based on generals need standard).	1 short-term space per 20 beds plus 1 long-term space per 10 staff on duty at any one time.	20% of all provision, spaces provision.	<ul style="list-style-type: none"> <li>Should provide the following parking standards: To aide the Council we consider a good example of parking standards for specialist accommodation for the elderly to be: <ul style="list-style-type: none"> <li>1 space per every 4 dwellings for Extra Care accommodation</li> <li>1 space per every 3 dwellings for Sheltered Housing.</li> </ul> </li> <li>consider the cycle parking requirements in Appendix 3 for older persons' housing would constitute overprovision in our experience and cycle parking should be limited to staff and visitors accordingly;</li> <li>As electric vehicle charging technology is progressing rapidly we feel that the provision of a quota of charging points runs a significant risk of obsolescence. The provision of cabling to car parking spaces to enable future installation of charging point in line with the wishes of residents is a more practical measure.</li> <li>No Local Plan Viability Assessment has been published with the Regulation 18 consultation which undermines the robustness of the consultation.</li> <li>Unknown if the cost of providing electric vehicle charging points has been properly allowed for. In viability assessment, need to do so.</li> </ul>	Noted	None
Development Type	Car Parking Standards	Cycle Parking Standards	Electric C																			
Retirement dwellings with no warden control (Category 1) -	1.5 spaces per unit including 0.25 visitor space.	1 short-term space per 3 units plus 1 long-term space per 5 units	20% of all provision, to be pass																			
Sheltered dwellings with warden control (Category 2)	0.75 spaces per unit including 0.25 visitor space.	1 short-term space per 3 units plus 1 long-term space per 5 units	20% of all provision, to be pass																			
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			<p>This reduction in car ownership is more pronounced for residents of 'Extra Care accommodation' which is specialist older persons' accommodation that is aimed at the 'frail' elderly. The average age of a resident in a McCarthy &amp; Stone 'Retirement Living Plus' (Extra Care) development is currently 83 years old. As the highway authority may likely to seek the residential car parking standards in Appendix 3 this would constitute a significant level of over provision in our view and would make it extremely difficult to deliver these types of development, particularly Extra Care, in the most sustainable locations (i.e. within 0.5 miles of a town or local centre) as such locations tend to be spatially constrained. We do however note that that the parking standards are reduced in more sustainable locations, but a 20% reduction in parking requirement would still constitute an overprovision of parking in our view.</p> <p>To aide the Council we consider a good example of parking standards for specialist accommodation for the elderly to be:</p> <p><input type="checkbox"/> 1 space per every 4 dwellings for Extra Care accommodation</p> <p><input type="checkbox"/> 1 space per every 3 dwellings for Sheltered Housing.</p> <p>Cycle Parking</p> <p>As referenced earlier, sheltered housing and in particular Extra Care accommodation, is used by older people who tend to be frail and are likely to have mobility difficulties. Were an older person likely to cycle on regular basis it would be unlikely they would require extra care accommodation.</p> <p>A survey of 242 McCarthy and Stone Retirement Living units showed only 7 bicycles owned by residents in these apartments. This is an ownership rate of 0.0289 cycles per apartment or 1 cycle per 35 apartments.</p> <p>Whilst we can understand the rationale behind encouraging cycling in the general population, we consider that a requirement for cycle spaces in specialist older persons' housing to be inappropriate and unnecessary. Both companies provide an internal mobility scooter store for use by residents which is a far more relevant requirement and in the handful of instances that a resident has used a bicycle it can be stored in this area.</p> <p>We consider the cycle parking requirements in Appendix 3 for older persons' housing would constitute overprovision in our experience and cycle parking should be limited to staff and visitors accordingly.</p> <p>Electric Vehicles</p> <p>As electric vehicle charging technology is progressing rapidly we feel that the provision of a quota of charging points runs a significant risk of obsolescence. The provision of cabling to car parking spaces to enable future installation of charging point in line with the wishes of residents is a more practical measure.</p> <p>As referred to earlier in our representation, no Local Plan Viability Assessment has been published with the Regulation 18 consultation which in our view undermines the robustness of the consultation. It is unknown at the time of writing if the cost of providing electric vehicle charging points has been properly allowed for.</p> <p>We would respectfully remind the Council that the PPG states that "<i>The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan</i>" (Paragraph: 002 Reference ID: 10-002-20190509).</p> <p>We respectfully request that the additional costs associated with providing electric vehicle charging points should be allowed for in the forthcoming Local Plan Viability Assessment.</p>			
P1_00256	No	<p>Parking standards are inadequate for the actual levels of car ownership in new residential developments. As a result, the completion of large-scale schemes has been followed by multiple problems of congestion and road safety. The proposed standards for the C3 Use Class are too low and too complicated. The minimum per dwelling standards should be raised as follows: 1 bedroom dwellings-1 space; 2 &amp; 3 bedroom - 2 spaces; 4 or more bedroom -3 spaces.</p>	<ul style="list-style-type: none"> <li>• Parking standards are inadequate, suggest following criterion</li> </ul>	Noted	None	
P1_00260	Yes	<p>Parking standards are inadequate for the actual level of car ownership in new residential plans.</p>	<ul style="list-style-type: none"> <li>• Agree with approach;</li> <li>• Parking standards are inadequate for actual level of car ownership</li> </ul>	Noted	None	
P1_00261	No	<p>See my comments above. Parking should always try to get to an average of less than 1 space per dwelling.</p>	<ul style="list-style-type: none"> <li>• Should be an average of less than one parking space per dwelling</li> </ul>	Noted	None	
P1_00262	Yes	<p>more e charging points</p>	<ul style="list-style-type: none"> <li>• Need more e-charging points</li> </ul>	Noted	None	
P1_00265	Yes	<p>Again the document does not go far enough</p>	<ul style="list-style-type: none"> <li>• Document does not go far enough</li> </ul>	Noted	None	
P1_00271	No	<p>Not enough parking spaces allocated to residential dwellings, as evidenced by recent developments where overflow parking disrupts local streets e.g. Red Lion Lane, Kings Langley. Allocate more spaces per dwelling.</p>	<ul style="list-style-type: none"> <li>• Not enough spaces allocated to residential dwellings. Allocate more spaces per dwelling.</li> </ul>	Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause	None	

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					congestion or harm to amenity or highway safety.	
P1_00281		Yes	But again no faith that it will be implemented	<ul style="list-style-type: none"> <li>No confidence it will be implemented</li> </ul>	Noted	None
P1_00284		No	No. I believe parking standards have been inadequate for the actual levels of car ownership in new residential developments. As a result, the completion of large-scale schemes has been followed by multiple problems of congestion and road safety. I therefore suggest that the proposed standards for the C3 Use Class are too low and too complicated. The minimum per dwelling standards should be raised as follows: 1 bedroom dwellings-1 space; 2 & 3 bedroom - 2 spaces; 4 or more bedroom -3 spaces.	<ul style="list-style-type: none"> <li>Parking levels are inadequate for the actual levels of ownership;</li> <li>Proposed standards for the C3 Use Class are too low and too complicated and recommend standards are raised.</li> </ul>	Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety.	None
P1_00287		No	These parking standards are insufficient for the actual levels of car ownership in the new residential developments. The minimum per dwelling standards should be raised as follows: 1 bedroom dwellings-1 space; 2 & 3 bedroom – 2 spaces; 4 or more bedroom -3 spaces.	<ul style="list-style-type: none"> <li>Parking levels are inadequate for the actual levels of ownership. Proposed standards for C3 too low and recommend standards are raised.</li> </ul>	Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety.	None
P1_00001			Any major new development should be subject to transport forecasts based on a realistic level of vehicle use from within TRDC and immediately surrounding areas. Additional road infrastructure should be put in place before any building work commences.	<ul style="list-style-type: none"> <li>Major development should be subject to transport forecasts based on a realistic level of vehicle use;</li> <li>Infrastructure before development</li> </ul>	Noted	None
P1_00005		Yes	See comments above	<ul style="list-style-type: none"> <li>No Comments</li> </ul>	Noted	None
P1_00014		Yes	As before.	<ul style="list-style-type: none"> <li>Improve public transport and the need for less for parking would be reduced</li> </ul>	Noted	None
P1_00015		Yes	See above.	<ul style="list-style-type: none"> <li>Should not charge for stays over one hour in Rickmansworth centre;</li> <li>Should be free parking for up to 3 hours</li> </ul>	Noted	None
P1_00017		Yes	Mandate parking spaces	<ul style="list-style-type: none"> <li>Mandate parking spaces</li> </ul>	Noted	None
P1_00024		Yes		<ul style="list-style-type: none"> <li>No Comment</li> </ul>	Noted	None
P1_00025		Yes	Less housing	<ul style="list-style-type: none"> <li>Less housing</li> </ul>	Noted	None
P1_00032		Yes	No	<ul style="list-style-type: none"> <li>Do not agree with approach but no reason given</li> </ul>	Noted	None
P1_00033		Yes	No	<ul style="list-style-type: none"> <li>Do not agree with approach but no reason given</li> </ul>	Noted	None
P1_00034		Yes	No Comment	<ul style="list-style-type: none"> <li>No Comment</li> </ul>	Noted	None
P1_00038		Yes	No	<ul style="list-style-type: none"> <li>Do not agree with approach but no reason given</li> </ul>	Noted	None
P1_00040		Yes	Under no circumstances should any building take part on green places. The only building I would support is on brownfield sites - that is places where there has already got buildings.	<ul style="list-style-type: none"> <li>Do not develop Green Belt Land</li> </ul>	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	None
P1_00041		Yes	Alternatives need to be considered.	<ul style="list-style-type: none"> <li>Need to consider alternatives</li> </ul>	Noted	None
P1_00045		Yes		<ul style="list-style-type: none"> <li>No Comment</li> </ul>	Noted	None
P1_00053		No	Yes	<ul style="list-style-type: none"> <li>Agree with approach</li> </ul>	Noted	None
P1_00057		Yes	Use areas with lower car ownership.	<ul style="list-style-type: none"> <li>Use areas with low car ownership</li> </ul>	Noted	None
P1_00064		Yes	xxx	<ul style="list-style-type: none"> <li>No Comment</li> </ul>	Noted	None
P1_00066_ R Franks		Yes	see above Rather than work out how many houses per hectare is allowed, work from the other way, cars ,transportation ,facilities, roadways, pollution the	<ul style="list-style-type: none"> <li>Rather than how many houses per hectare, work other way round calculating space for cars, transport, facilities.</li> </ul>	Noted	None

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			effects of as this way will reduce the amounts of new housing to acceptable levels without all of us suffering with poor health and mental health issues			
P1_00068		Yes	How will the Council cope with hundreds of dead electric cars with their highly toxic batteries? Not a word about that in your plan - nor for that matter solar panels - a great idea but dead ugly and not that efficient.	<ul style="list-style-type: none"> <li>Will be lots of electric cars with highly toxic batteries, great idea but dead ugly and not that efficient.</li> </ul>	Noted	None
P1_00077				<ul style="list-style-type: none"> <li>No Comment</li> </ul>	Noted	None
P1_00078		No	The blue zone areas radius needs to be reduced by approximately with detailed requirements study for each area.	<ul style="list-style-type: none"> <li>Blue zone areas radius needs to be reduced</li> </ul>	Noted	None
P1_00088		Yes	Once again no reference above to residents who need vehicles for work. Plumbers, Electricians, builders, one man/woman business doing DIY. Gardeners/dog walkers all of these jobs have equipment to take to customer. Not to mention all the delivery drivers and taxis drivers.	<ul style="list-style-type: none"> <li>Once again no reference above to residents who need vehicles for work.</li> </ul>	Noted	None
P1_00089		Yes	Explain where these 20% unallocated cars will go, any development needs to have car spaces and if development on the station car park 190 houses, we need to have cars to be parked but not to the detriment of other residents roads. This is an issue that hopefully the council will take seriously for local residents as most roads have permit parking and yellow lines apart from our main middle green and this can cause danger to residents living there and looks unsightly with lots of cars parked.	<ul style="list-style-type: none"> <li>Explain where 20% unallocated cars will go;</li> <li>Need to have cars to be parked but not to detriment of other residents roads</li> </ul>	Noted	None
P1_00096		Yes	I would have thought that 20% extra parking is the bare minimum, given that most houses have at least 2 cars or more.	<ul style="list-style-type: none"> <li>20% extra parking is bare minimum given houses have at least 2 cars</li> </ul>	Noted	None
P1_00106		Yes	Yes, forget about it.	<ul style="list-style-type: none"> <li>Forget about it</li> </ul>	Noted	None
P1_00112		Yes	Avoid any developments where there will not be adequate off street parking	<ul style="list-style-type: none"> <li>Avoid developments where there will not be adequate off street parking</li> </ul>	Noted	None
P1_00113		Yes	No reason	<ul style="list-style-type: none"> <li>No alternatives suggested.</li> </ul>	Noted	None
P1_00119		Yes	This land is a sanctuary for horses, plants, trees, wildlife and local people. This area has been developed enough and the local infrastructure will not be able to support yet more housing.	<ul style="list-style-type: none"> <li>Land is sanctuary for wildlife</li> </ul>	Infrastructure requirements will be identified in the Infrastructure Delivery Plan. If such works require planning permission, they will be required to submit an application which will be considered on its merits and whether the proposals would have an acceptable or unacceptable impact on the environment. Requirement for a net gain in biodiversity would be applied. Policies provide for the retention of trees and hedgerows where possible and replanting.	None
P1_00121		No	Forget the greenbelt - find alternatives	<ul style="list-style-type: none"> <li>Do not develop Green Belt Land</li> </ul>	The priority for development is making as much use as possible of suitable brownfield sites and underutilised land, and an exhaustive search of potential sites to accommodate development needs has been carried out as part of the SHELAA (2020) and Urban Capacity Study (2020). The draft Housing Density policy also promotes a significant uplift in the density of development in the District, and in all cases, proposals will need to make efficient and effective use of land. However, even with these actions, there is insufficient capacity to meet the growth levels required by the Standard Method within the District's existing urban area. The Council therefore has no alternative but to release a small portion of the Green Belt in order to meet its development needs. Should all the sites in the Regulation 18 consultation be allocated, the Green Belt release that would be required would represent approximately only 4% of the total Green Belt in Three Rivers. Furthermore, the Stage 1 and 2 Green Belt Reviews, alongside other environmental and sustainability considerations, have been taken into account when identifying which potential areas of Green Belt Land to release".	None
P1_00127		Yes	As above	<ul style="list-style-type: none"> <li>If developing property with inadequate public transport provision, greater car parking should be permitted.</li> </ul>	Noted	None
P1_00131		Yes	Scrap Appendix 3. Do proper research. Start again.	<ul style="list-style-type: none"> <li>Scrap Appendix 3 and do proper research and start again.</li> </ul>	Noted	None
P1_00132		Yes	impacts future plans	<ul style="list-style-type: none"> <li>Will impact future plans</li> </ul>	Noted	None
P1_00135		Yes	Free public transport and a Tram service to Watford	<ul style="list-style-type: none"> <li>Free public transport and tram service to Watford</li> </ul>	Noted	None
P1_00137		Yes	Increasing and promoting housing developments = lack of parking spaces	<ul style="list-style-type: none"> <li>Increasing and promoting housing developments = lack of parking spaces</li> </ul>	Noted	None

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P1_00140		No	Yes		• Agree with approach	Noted	None
P1_00155		Yes	In developments where there is unallocated parking, it should be clear how many spaces are available to each dwelling and there should be ample space for delivery vans to access and turn. The location of parking bays or designated parking bays should be reasonably spaced away from the dwellings so as not to impact the view. (I have lived in places which have a lack of clarity on parking areas resulting in cars not belonging to the occupant being parked directly outside front windows, avoiding this kind of bad planning for new developments would be preferable!)		• Developments where is unallocated parking, should be clear how many spaces are available to each dwelling; • Need ample space for delivery drivers; • Location of parking bays should be reasonably spaced away from the dwellings so as not to impact the view.	Noted	None
P1_00162		Yes	Every house should have an electric car charging point and plenty more at free carparks and recreation areas		• Every house should have an electric car charging points	Noted	None
P1_00170		Yes	Increase the parking space allowances as above...		• Increase parking allowances	Noted	None
P1_00183		Yes	People won't give up their cars		• People won't give up their cars	Noted	None
P1_00190		Yes	More realistic spaces.		• More realistic spaces	Noted	None
P1_00196		No	We believe parking standards have been inadequate for the actual levels of car ownership in new residential developments. As a result, the completion of large-scale schemes has been followed by multiple problems of congestion and road safety. We therefore suggest that the proposed standards for the C3 Use Class are too low and too complicated. The minimum per dwelling standards should be raised as follows: 1 bedroom dwellings-1 space; 2 & 3 bedroom - 2 spaces; 4 or more bedroom -3 spaces.		• Parking standards are inadequate for actual levels of car ownership; • Suggested new parking standards.	Noted	None
P1_00206		Yes	Consider the parking requirements vs DPH		• Consider parking requirements vs DPH	Noted	None
P1_00209		Yes	It is for councillors to consider sensible, alternative options and proposal a range of those options		• For councillors to decide	Noted	None
P1_00218		Yes	New developments should be built to be without individual cars, but instead a car club approach, so that the parking is centralised, not at the front door. Villages are likely to move to this model, with the use of car clubs in village car parks, and the uber approach to car ownership and mobility becoming more common.		• New developments should be built to be without individual cars, but instead a car club approach,	Noted	None
P1_00219		Yes	As above		• New development should include 100% off street parking. Imposition of permit parking nothing more than a covert tax	Noted	None
P1_00232		No	Yes		• Agree with approach	Noted	None
P1_00235		Yes	Leave things as they are OR have 1 hour restriction. The argument about enforcement is a fallacy, as there are so few cars using the street, the risk of a once a week walk by will deter anyone who wants to use it as a daily parking spot.		• Leave as is or have an hour restriction; • Cannot have enforcement, are so few cars using street, risk of a once a week walk by will not deter anyone.	Noted	None
P1_00244		Yes	A statement about how much land is lost to car parking – to set alongside new housing developments - would be a recognition of the huge impact of the motor vehicle, even when it is stationary.		• Need statement about how much land is lost to car parking	Noted	None
P1_00254_ Planning Bureau Ltd	Planning Bureau Ltd	Yes	1. That the Council's parking standards for older persons' housing typologies are reduced in Appendix 3 2. That the Council's cycle parking standards for older persons' housing are reduced in Appendix 3 3. That a proportionate and appropriate cost is attributed to the provision of electric vehicle charging points in the <i>Local Plan Viability Testing Report</i> .		• Parking and cycle standards for older persons' housing are reduced; • Appropriate cost is attributed to electric vehicle charging point provision in the <i>Local Plan Viability Testing Report</i> .	Noted	None
P1_00256		Yes	Parking standards are inadequate for the actual levels of car ownership in new residential developments. As a result, the completion of large-scale schemes has been followed by multiple problems of congestion and road safety. The proposed standards for the C3 Use Class are too low and too complicated. The minimum per dwelling standards should be raised as follows: 1 bedroom dwellings-1 space; 2 & 3 bedroom - 2 spaces; 4 or more bedroom -3 spaces.		• Parking standards are inadequate for actual levels of car ownership; • Suggested new parking standards.	Noted	None
P1_00262		Yes	eliminate parking on pavements to encourage pedestrians		• Eliminate parking on pavements to encourage pedestrians.	Noted	None
P1_00271		Yes	As above		• Not enough spaces allocated to residential dwellings. Allocate more spaces per dwelling.	Noted	None

### Promoter and Landowner Representations

REPRESENTATION REFERENCE	REPRESENTOR	YES/ NO	REPRESENTATION	SUMMARY OF REPRESENTATION / MAIN ISSUES RAISED	OFFICER/COUNCIL RESPONSE	OFFICER'S/ COUNCIL'S PROPOSED ACTION
Q28. Do you think the Preferred parking is the right approach?						

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<p>PL_00002_ ACFS8b</p>	<p>ROK Planning on behalf of Woolbro Group</p> <p>210818 - TRDC Reg 18 - ROK OBO WOOLBRO FINAL</p>	<p>1.45 The Policy Option is generally supported given that appendix 3 sets out the preferred parking standards and zone-based reductions.</p> <p>1.46 However, it is considered that the policy should actively support and encourage lower levels of car ownership rather than simply stating that “there are high levels of car ownership and usage in Three Rivers, and the demand for and management of parking is an important issue for the District”.</p>	<ul style="list-style-type: none"> <li>Generally supported.</li> <li>The policy should actively support and encourage lower levels of car ownership rather than simply stating that “there are high levels of car ownership and usage in Three Rivers, and the demand for and management of parking is an important issue for the District”.</li> </ul>	<p>Noted. The Local Plan cannot directly control the levels of car ownership or usage in the District (as this is determined by individuals’ choices), but it is fully recognised that sustainable transport and parking policies can help to influence choices over car ownership and methods of travel (whether this be by private car or more sustainable means). The mechanism to encourage a lower level of car ownership (and therefore usage) in the Preferred Policy Option for Parking is proposed as zonal reductions (the promotion of fewer parking spaces in locations well served by public transport) and a reduction in the required number of spaces for dwellinghouses. This is alongside other sustainable transport measures included in the draft policies. These measures considered to be active support and encouragement for lower levels of car ownership.</p>	<p>No action</p>
<p>PL_00014_ CFS22</p>	<p>ROK Planning on behalf of landowner</p> <p>Regulation 18 represent ation</p>	<p>The policy option is supported in principle.</p> <p>However, it is considered that the policy should actively support and encourage lower levels of car ownership rather than simply stating that “there are high levels of car ownership and usage in Three Rivers, and the demand for and management of parking is an important issue for the District”.</p>	<ul style="list-style-type: none"> <li>Generally supported.</li> <li>The policy should actively support and encourage lower levels of car ownership rather than simply stating that “there are high levels of car ownership and usage in Three Rivers, and the demand for and management of parking is an important issue for the District”.</li> </ul>	<p>Noted. The Local Plan cannot directly control the levels of car ownership or usage in the District (as this is determined by individuals’ choices), but it is fully recognised that sustainable transport and parking policies can help to influence choices over car ownership and methods of travel (whether this be by private car or more sustainable means). The mechanism to encourage a lower level of car ownership (and therefore usage) in the Preferred Policy Option for Parking is proposed as zonal reductions (the promotion of fewer parking spaces in locations well served by public transport) and a reduction in the required number of spaces for dwellinghouses. This is alongside other sustainable transport measures included in the draft policies. These measures considered to be active support and encouragement for lower levels of car ownership.</p>	<p>No action</p>
<p><b>Q28a. Do you think the Preferred Policy Option for Parking Standards (Appendix 3) is the right approach?</b></p>					
<p>PL_00002_ ACFS8b</p>	<p>ROK Planning on behalf of Woolbro Group</p> <p>210818 - TRDC Reg 18 - ROK OBO WOOLBRO FINAL</p>	<p>It is considered that the parking standards option set out in Appendix 3 are unsound and require revision to reflect National Guidance which clearly advocates reduced reliance on the private car.</p> <p>1.51 With reference to Sustainability Zones, it is confirmed at page 137 that Kings Langley Station and the surrounding area is in Sustainability Zone 2, i.e. where 90% of indicative demand-based parking standard applies. This Zoning is wholly disagreed with and it is considered that this would undermine the soundness of the Local Plan.</p> <p>1.52 Kings Langley Station is a highly accessible and sustainable location with services running frequently throughout the day and evening towards London Euston and Northampton as well as intermediate stations, including Watford. From Kings Langley to London Euston is approximately 25 minutes. By virtue of this, Kings Langley Station should be located in Sustainability Zone 1 where the lower parking standard applies.</p> <p>1.53 Further disagreement arises as a result of the reduction of indicative demand-based parking standards. It is considered incorrect that Sustainability Zone 1 requires only 20% less than the rest of the District, which could feasibility be a small village with limited services and amenities and extremely poor access to public transport. Rather, it is considered that as a starting point, Zone 1 should have a 50% of indicative demand-based parking standard and Zone 2 should have a 75% standard. It is illogical for Sustainability Zone 1 (i.e. the most accessible and sustainable locations) to provide only 20% less car parking than the least accessible and sustainable locations.</p> <p>1.54 Proposed Strategic Objectives 6 and 7 are relevant in this regard: -</p>	<ul style="list-style-type: none"> <li>Kings Langley Station and the surrounding area is in Sustainability Zone 2, i.e. where 90% of indicative demand-based parking standard applies. Disagree with Kings Langley station being included in Zone 2 and states Kings Langley Station should be in Zone 1 (lower parking standard) as it is a highly accessible and sustainable location.</li> <li>Reductions in Zones 1 and 2 should be reduced further as it is illogical for Zone 1 (i.e. the most accessible and sustainable locations) to provide only 20% less car parking than the least accessible and sustainable locations (which could feasibility be a small village with limited services and poor public transport). Zone 1 should require 50% of indicative demand based parking standard and Zone 2 should have 75% standard. Adopting lower percentages would encourage more sustainable methods of transport.</li> </ul>	<ul style="list-style-type: none"> <li>Sustainability Zone 1 is the high sustainability zone based on an 800m radius (approximately 10 minutes’ walk) around the train / underground station in the Principal Town, Rickmansworth. The town centre provides shops and other services that together with the station provide the potential for the most sustainable living in the District. In comparison, the area surrounding the station in Kings Langley has a significantly lower level of access to services, shops and facilities and subsequently it is not considered justified to include Kings Langley in Sustainability Zone 1. Access to the station does enable easy access to public transport in the 800m radius surrounding Kings Langley station so it is considered justified to include the area in Zone 2 on this basis. In addition, it should be noted that these standards are not a ‘maximum’ approach and should be as a ‘standard’ which may be adjusted upward or downward if robust evidence is provided. As such, the car parking standards should be taken as a starting point and the proposed scheme will be assessed accordingly.</li> <li>Reducing the percentages to 50% in Zone 1 and 75% in Zone 2 is not considered appropriate. The reductions in the</li> </ul>	<p>Add detail to introductory text in Appendix 2 Parking Standards to explain that:  <i>“These standards have moved away from a ‘maximum’ approach and will be applied as a ‘standard’ which may be adjusted upward or downward if robust evidence is provided. As such, the car parking standards should be taken as a starting point and the proposed scheme will be assessed accordingly. Applicants should explain how the standards have been applied to their individual proposal and, where appropriate, how and why they have deviated from them. The expectation is that development will meet its own needs on-site by providing parking to this standard.”</i></p>

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		<ul style="list-style-type: none"> <li>• Strategic Objective 6: Encourage active modes of travel and enable the integration of sustainable transport within new developments; and</li> <li>• Strategic Objective 7: Reduce the need to travel by locating development in sustainable and accessible locations.</li> </ul> <p>1.55 Also relevant is the Department for Transport document “<i>Decarbonising Transport: A Better, Greener Britain</i>”. The first Strategic Priority of this is “accelerating modal shift to public and active transport”, which includes using cars differently and less often.</p> <p>1.56 The proposed Sustainability Zone reductions in car parking requirements conflict with both the Strategic Objectives and the Department for Transport document. If TRDC realistically want to meet these objectives, then this section of the Plan requires amendments: -</p> <ul style="list-style-type: none"> <li>• Kings Langley Station should be in Sustainability Zone 1; and</li> <li>• The indicative demand-based standards should be: - <ul style="list-style-type: none"> <li>o Zone 1: <del>80%</del> <u>50% of indicative demand-based parking standard</u></li> <li>o Zone 2: <del>90%</del> <u>75% of indicative demand-based parking standard</u></li> </ul> </li> </ul> <p>1.57 The suggested figures are justified by the sustainability of the sites within Zones 1 and 2 in terms of access to public transport and services and amenities in comparison to the rest of the District. Further weight should be given to the Climate Emergency which was declared in Three Rivers in April 2019 which again means that reliance on private transport should be reduced.</p> <p>1.58 It is clear that as an authority, TRDC should be doing more to promote sustainable methods of transport, rather than promoting and encouraging continued high car ownership and usage. By adopting the lower percentages as set out above, TRDC would actively encourage more sustainable methods of transport and thus contribute to addressing the climate emergency.</p> <p>1.59 In terms of cycle parking, appendix 3 establishes that each dwelling should have 1 long-term space per unit if no garage or shed is provided. For flats, 1 space per 2 units should be provided. This is supported.</p>	<ul style="list-style-type: none"> <li>• Standards for cycle parking for flats is supported.</li> </ul>	<p>Sustainability Zones are only one of the mechanisms which encourage the use of sustainable transports. In addition, the updated standards for the required number of parking spaces for C3 residential dwellings have been reduced from the current adopted Parking Standards (Development Management Policies LDD):</p> <ul style="list-style-type: none"> <li>o 1 bed: decreased from 1.75 to 0.9 spaces per dwelling</li> <li>o 2 bed: decreased from 2 to 1.4 spaces per dwelling</li> <li>o 3 bed: decreased from 2.25 to 1.9 spaces per dwelling</li> <li>o 4 bed: decreased from 3 to 2.5 spaces per dwelling</li> </ul> <p>Furthermore, the standards may be adjusted upward or downward if robust evidence is provided and so the standards are not proposed as absolute. As such, the car parking standards should be taken as a starting point and the proposed scheme will be assessed accordingly. Applicants should explain how the standards have been applied to their individual proposal and, where appropriate, how and why they have deviated from them. The expectation is that development will meet its own needs on-site by providing parking to this standard.</p>	
PL_00014_CFS22	<p>ROK Planning on behalf of landowner</p> <p>Regulation 18 representation</p>	<p>It is considered that the parking standards set out in draft Plan Appendix 3 are unsound and require revision to reflect national guidance, which clearly advocates reduced reliance on the private car.</p> <p>With reference to Sustainability Zones, it is confirmed that Knoll Oak is located within the “Rest of District” category and the full indicative standards would apply.</p> <p>Proposed Strategic Objectives 6 and 7 are relevant in this regard: -</p> <ul style="list-style-type: none"> <li>• Strategic Objective 6: Encourage active modes of travel and enable the integration of sustainable transport within new developments; and</li> <li>• Strategic Objective 7: Reduce the need to travel by locating development in sustainable and accessible locations.</li> </ul> <p>Also relevant is the Department for Transport document “<i>Decarbonising Transport: A Better, Greener Britain</i>”. The first Strategic Priority of this is “accelerating modal shift to public and active transport”, which includes using cars differently and less often.</p> <p>The proposed Sustainability Zone reductions in car parking requirements conflict with both of the Strategic Objectives and the Department for Transport document. If TRDC realistically want to meet these objectives, the draft Plan Appendix 3 requires amendment. Further weight should be given to the Climate Emergency which was declared in Three Rivers in April 2019 which again means that reliance on private transport should be reduced.</p> <p>It is clear that as an authority, TRDC should be doing more to promote sustainable methods of transport, rather than promoting and encouraging continued high car ownership and usage.</p> <p>In terms of cycle parking, draft Plan Appendix 3 establishes that each dwelling should have 1 long-term space per unit if no garage or shed is provided. For flats, 1 space per 2 units should be provided. This is supported.</p>	<ul style="list-style-type: none"> <li>• CFS22 Knoll Oak is in “Rest of District” where full standards apply.</li> <li>• Sustainability Zone reductions in car parking requirements conflict with the Strategic Objectives and the Department for Transport document which looks to accelerate a modal shift. Subsequently Appendix 3 (Parking Standards) needs amendment. TRDC should be doing more to promote sustainable methods of transport rather than encouraging continued high car ownership and usage.</li> <li>• Standards for cycle parking for flats is supported.</li> </ul>	<ul style="list-style-type: none"> <li>• Correct.</li> <li>• It is assumed that the suggested amendment is to further reduce standards within the Sustainability Zones. The reductions in the Sustainability Zones are only one of the mechanisms which encourage the use of sustainable transports. In addition, the updated standards for the required number of parking spaces for C3 residential dwellings have been reduced from the current adopted Parking Standards (Development Management Policies LDD): <ul style="list-style-type: none"> <li>o 1 bed: decreased from 1.75 to 0.9 spaces per dwelling</li> <li>o 2 bed: decreased from 2 to 1.4 spaces per dwelling</li> <li>o 3 bed: decreased from 2.25 to 1.9 spaces per dwelling</li> <li>o 4 bed: decreased from 3 to 2.5 spaces per dwelling</li> </ul> </li> </ul> <p>Furthermore, the standards may be adjusted upward or downward if robust evidence is provided and so the standards are not proposed as absolute. As such, the car parking standards should be taken as a starting point and the proposed scheme will be assessed accordingly. Applicants should explain how the standards have been applied to their individual proposal and, where appropriate, how and why they have deviated from them. The expectation is that development will meet its own needs on-site by providing parking to this standard.</p> <ul style="list-style-type: none"> <li>• Noted.</li> </ul>	No action

