

**Meeting:** Planning and Development Committee **Agenda Item:**

**Date:** 5 March 2019

**Author:** Rebecca Elliott 01438 242836

**Lead Officer:** Chris Berry 01438 242257

**Contact Officer:** Rebecca Elliott 01438 242836

**Application No:** 18/00328/FPM

**Location:** The IET, Michael Faraday House, Six Hills Way, Stevenage

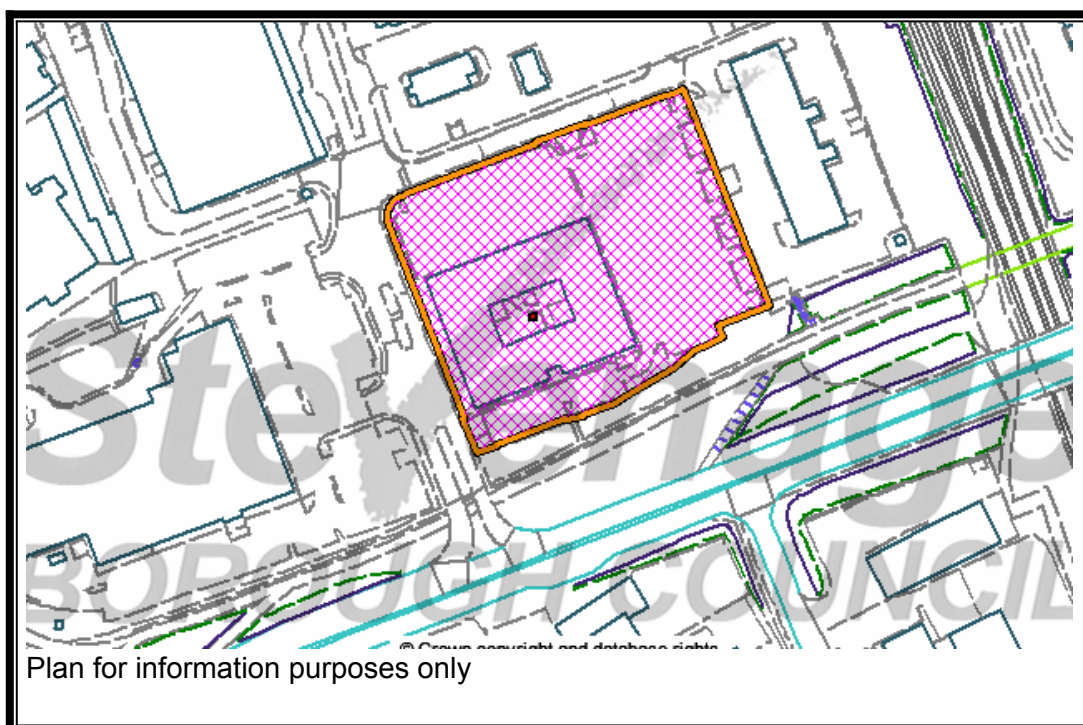
**Proposal:** Construction of a split-level car park with an attached plant room and cycle store and alterations to the existing parking arrangement that will create an additional 82 car parking spaces across the site; alterations to the existing northern vehicular access point, and; associated works.

**Drawing Nos:** MFHCP-PWA-00-00-DR-A-0001-G2\_LOCATION PLAN; MFHCP-PWA-00-00-DR-A-0002-G2\_EXISTING SITE PLAN; MFHCP-PWA-00-00-DR-A-0014-G2\_PROPOSED BLOCK PLAN; MFHCP-PWA-00-00-DR-A-0003-G2\_PROPOSED GROUND FLOOR PLAN; MFHCP-PWA-00-01-DR-A-0004-G2\_PROPOSED FIRST FLOOR PLAN; MFHCP-PWA-00-02-DR-A-0005-G2\_PROPOSED SECOND FLOOR PLAN; MFHCP-PWA-00-ZZ-DR-A-0006-G2\_PROPOSED ELEVATIONS 1; MFHCP-PWA-00-ZZ-DR-A-0007-G2\_PROPOSED ELEVATIONS 2; MFHCP-PWA-00-ZZ-DR-A-0008-G2\_PROPOSED ELEVATIONS IN CONTEXT; MFHCP-PWA-00-ZZ-DR-A-0009-G3\_PROPOSED SECTIONS; 24077 - TOPOGRAPHICAL SURVEY REV A-TOPOGRAPHICAL SURVEY

**Applicant:** The Institution of Engineering and Technology

**Date Valid:** 15 June 2018

**Recommendation:** REFUSE PLANNING PERMISSION



## **1. SITE DESCRIPTION**

- 1.1 Michael Faraday House is a three storey red brick building, housing the offices of the Institution of Engineering and Technology, off Six Hills Way. Occupying a large corner plot, the building is visible from Six Hills Way, Gunnels Wood Road to the west and the entrance to and from Stevenage Leisure Park to the north of the site. Solar House is a three storey office building located to the east of the site, and accessed via the access road to the north, which also serves Michael Faraday House. The area is on the edge of the Gunnels Wood Road Employment Area to the south and west and Town Centre to the north and north east. Six Hills Way runs west to east along the southern edge of the site, and there are cycle and pedestrian footways similarly along the southern edge of the site. Michael Faraday House sits to the west of the site with car parking predominantly to the north and east of the building.

## **2. RELEVANT PLANNING HISTORY**

- 2.1 No relevant planning history aside from various advertisements on site.

## **3. THE CURRENT APPLICATION**

- 3.1 The current application seeks planning permission for the erection of a multi storey car park of five split levels across two and a half storeys, including a plant room and internal cycle store. The proposals include alterations to the existing car park arrangements and northern site access to allow entrance and exit from the site at this point. The works would provide for a total number of 82 additional parking spaces.

## **4. PUBLIC REPRESENTATIONS**

- 4.1 The application has been publicised by neighbour letters, the posting of a three site notices on lamp posts off Six Hills Way, Kings Way and the northern access road, and an advertisement has been placed in the local newspaper.
- 4.2 Letters of objection have been received by the owners and occupiers of Solar House which is located due east of the site. There concerns are:-
- Loss of light and impaired view;
  - Security;
  - Noise and disruption;
  - Congestion;
  - Impact on future lease of the site.
- 4.3 Letters of support have been received from various properties as listed below, many of whom are staff at the IET. These responses state:-
- Provide much needed secure parking on site;
  - Employees travel from areas not on appropriate public transport links;
  - Public transport is neither cost effective nor reliable;
  - Low cost alternatives are not cost effective for lower paid staff;
  - Parking on site is an attractive provision for perspective employees;
  - IET needs to make provision for car travel in order to support families and flexible working where public transport is inadequate;

- High percentage of staff who already utilise public transport and car sharing schemes. The IET also implement an excellent flexible working policy in attempts to ease the number of staff who must travel to work each day;
- If the application is based around the Local Transport Plan, then permission must be granted. The Transport Plan is fundamentally flawed due to ongoing issues with GTR trains;
- Improvements to the A602 surely support the need for workers to have improved car journeys.

## **5. CONSULTATIONS**

### **5.1 Police Crime Prevention Officer (PCPO)**

- 5.1.1 No objections raised, but the PCPO has suggested the applicant look at using a secure form of access control in to the cycle store to be able to record access in the case of theft being reported.

### **5.2 Stevenage Borough Council Engineering and Parking Services**

- 5.2.1 Additional 82 spaces will not result in a significant increased flow along Six Hills Way. The internal traffic circulation of Kings Park can also manage the additional flow.

### **5.3 Hertfordshire County Council - Highways**

- 5.3.1 Hertfordshire County Council (HCC) as Highway Authority strongly objects to the proposals. By overproviding car parking on site the scheme significantly undermines the objectives of the newly adopted Hertfordshire's Local Transport Plan 4 which aims to promote sustainable modes of travel over the use of a private car.

### **5.4 Local Lead Flood Authority**

- 5.4.1 On review of the SuDS Drainage Strategy Ref. 1653/200/PS prepared by Alan Baxter Ltd, dated 11/09/2018, in support of the planning application the LLFA objection has been removed on flood risk grounds and advise that the development site can be adequately drained and mitigated against any potential existing surface water flood risk if carried out in accordance with the overall drainage strategy. The drainage strategy attenuation and discharge will provide a significant betterment comparing to the existing situation. We therefore recommend imposition of conditions should the LPA grant planning permission.

### **5.5 Hertfordshire County Council - Sustainable Transport**

- 5.5.1 The submitted Travel Plan (amended) evaluation has been undertaken with reference to Hertfordshire County Council's Travel Plan Guidance ([www.hertfordshire.gov.uk/travelplans](http://www.hertfordshire.gov.uk/travelplans)) and has been found acceptable.

## **6. RELEVANT PLANNING POLICIES**

### **6.1 Background to the Development Plan**

- 6.1.1 In the determination of planning applications development must be in accordance with the statutory development plan unless material considerations indicate otherwise. For Stevenage the statutory development plan comprises:

- Hertfordshire Waste Development Framework 2012 and Hertfordshire Waste Site Allocations Development Plan Document (adopted 2012 and 2014);

- Hertfordshire Minerals Local Plan 2002 – 2016 (adopted 2007); and
- The Stevenage District Plan Second Review 2004.

The Council has now reached an advanced stage in the preparation of a new Stevenage Borough Local Plan 2011-2031. The Plan has been used as a material consideration in the determination of all planning applications registered on or after Wednesday 6 January 2016. The Plan has now been through the Examination process and the Inspector's Report was received in October 2017. This recommended approval of the Plan, subject to modifications proposed. The Plan is currently subject to a holding direction placed upon it by the Ministry of Housing Communities and Local Government (MHCLG), which prevents its adoption whilst MHCLG are considering whether or not to call it in.

- 6.1.2 The National Planning Policy Framework sets out that decision-takers may give weight to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the National Planning Policy Framework.
- 6.1.3 In considering the policy implications of any development proposal, the Local Planning Authority will assess each case on its individual merits, however, bearing in mind the positive Inspector's Report, significant weight will be afforded to policies within the emerging Local Plan.

## **6.2 Central Government Advice**

- 6.2.1 A revised National Planning Policy Framework (NPPF) was published in February 2019. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. Annex 1 of the NPPF provides guidance on how existing local plan policies which have been prepared prior to the publication of the NPPF should be treated. Paragraph 213 of the NPPF applies which states that due weight should be afforded to the relevant policies in the adopted local plan according to their degree of consistency with it.
- 6.2.2 Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF is itself a material consideration. Given that the advice that the weight to be given to relevant policies in the local plan will depend on their degree of consistency with the NPPF, it will be necessary in the determination of this application to assess the consistency of the relevant local plan policies with the NPPF. The NPPF applies a presumption in favour of sustainable development.
- 6.2.3 In addition to the NPPF, advice in Planning Practice Guidance must also be taken into account. It states that, where the development plan is absent, silent or the relevant policies are out of date, paragraph 11 of the National Planning Policy Framework requires the application to be determined in accordance with the presumption in favour of sustainable development unless otherwise specified.

## **6.3 Adopted District Plan**

TW1	Sustainable Development
TW8	Environmental Safeguards
TW9	Quality of Design
TW10	Crime Prevention
E2	Employment Areas
E3	Employment Sites
T6	Design Standards
T8	Integration of Transport Modes
T13	Cycleways

- T14 Pedestrians
- T15 Car Parking Strategy

## **6.4 Emerging Local Plan**

- SP1 Presumption in Favour of Sustainable Development
- SP2 Sustainable Development in Stevenage
- SP3 A Strong, Competitive Economy
- SP6 Sustainable Transport
- SP8 Good Design
- SP11 Climate Change, Flooding and Pollution
- EC2 Gunnels Wood Employment Area and Edge-of-Centre Zone
- IT4 Transport Assessments and Travel Plans
- IT5 Parking and Access
- IT6 Sustainable Transport
- GD1 High Quality Design
- FP1 Climate Change

## **7. APPRAISAL**

- 7.1 The main issues for consideration in the determination of this application are the acceptability of the proposal in land use policy terms, design and scale of the proposal, impact on neighbour amenity, acceptability of increased levels of parking and sustainability, and acceptability of the Travel Plan.

### **7.2 Acceptability in Land Use Policy Terms**

- 7.2.1 The site is located in the Gunnels Wood Road Employment Area as designated in adopted Policy E2 of the District Plan. It is also within the Edge of Centre zone as designated in adopted Policy E3 of the District Plan and policy EC2 of the Emerging Local Plan. In this area specifically the site is allocated for B1 use. The use of Michael Faraday House by the IET is for office use. The proposed multi-storey car park (MSCP) would sit within the curtilage of the IET site and as a further provision of parking for the office facilities is not contrary to the policy allocation for the site.

### **7.3 Design and Scale**

- 7.3.1 The proposed MSCP would be located on the eastern side of the site, within the existing car park, (designated Car park zone B on the submitted plans). Designed to work on a split level basis, the two and half storey building would accommodate five floors of parking, three on the western side and two on the eastern side of the building. A stair well is located at each end, with a plant room and cycle storage area to the south of the building. The design is contemporary with simple rectangular panels of a metal mesh system to enclose the MSCP but also allow ventilation, along with brickwork on the stair well towers. Vertical landscaping is proposed on the western elevation using a variety of climbing plants.
- 7.3.2 The split level design would have a half storey layout with separate up and down ramps at each end of the building. Providing a total of 219 car parking spaces within the MSCP, the building would measure 76m in length and 32.6m in width. The maximum height as measured on the western elevation would be 8.7m and the lower eastern elevation would measure 5.6m in height. The building would be set 9.3m from Michael Faraday House and approximately 1.6m from the boundary with Solar House. To the south the MSCP would be set approximately 14.7m from the boundary with Six Hills Way with landscaping proposed and to the north would be set approximately 4m from the boundary.

- 7.3.3 Given the function of the building and its placement within the site, between two large office buildings, the scale and design are considered acceptable. Views of the MSCP would be largely obscured by Michael Faraday House, Solar House and the Six Hills Way bridge over the railway line. Views from Six Hills Way itself are most prevalent when alongside the eastern side of the site. The biggest vantage point is from the Stevenage Leisure Park to the north which is on raised ground levels and is largely open. Notwithstanding this, the use of the leisure park for largely parking related to the leisure uses available is such that the character and visual amenity of the area is similar, and would not be harmed by the addition of the proposed MSCP building.

#### **7.4 Impact on Neighbour Amenity**

- 7.4.1 In assessing the impact of the proposal on the amenity of neighbouring buildings, the affected properties are Michael Faraday House itself and Solar House to the east. The nearest and tallest elevation of the MSCP would be located 9.3m away from the eastern side elevation of Michael Faraday House. Undertaking the British Research Establishment (BRE) 25 degree test taken from the parallel elevation of Michael Faraday House and at a minimum height of 2m from the floor level, the line is intersected by the proposal by approximately 2.2m of the building height. Located to the east of the office building, this is likely to obscure morning sunlight in to these windows. Notwithstanding this, the time during which the MSCP would impact on sunlight is minimal and as the offices are contained within the site and the applicant is aware of the impact of the proposal on their existing office building, it is not considered the proposed MSCP would have an adverse impact on the occupiers of Michael Faraday House.
- 7.4.2 The occupiers of Solar House to the east include Sodexo and JCA. The management company contracted by the owners of Solar House, along with Sodexo have made representations objecting to the proposal. Objections relating to amenity suggest the scale and height of the MSCP as well as its siting in close proximity of the shared boundary would cause undue loss of light and outlook from the western facing windows of the neighbouring office building. It has been suggested in the objections raised that the internal layout of the building has been configured and upgraded to include client suites, specifically to take in the view from the building as existing.
- 7.4.3 Undertaking the same BRE 25 degree test, the proposed MSCP would not affect the light enjoyed by the windows on this western side of Solar House, with the office building being located approximately 17.2m from the boundary and approximately 18.8m from the proposed building. Furthermore, in terms of outlook, this distance is considered sufficient such that the proposed MSCP, at a height of 5.6m at its closest, would not be considered overbearing. In planning terms there is no right to a view beyond your existing site boundary. Whilst the proposal will see the removal of existing landscaping, the provision of a building of this nature and function and in this employment based area of the town is not considered inappropriate or harmful to the functioning and occupiers of the neighbouring office building.

#### **7.5 Acceptability of Increased Levels of Parking and Sustainability**

- 7.5.1 The existing site provides 220 parking spaces predominantly across two main areas to the north and east of the building. The application seeks to provide an additional 82 parking spaces. These spaces would be provided through alterations to the existing parking arrangements including a revised 'in-out' access off the northern service road and the erection of the 219 parking space MSCP. The car park would replace the existing eastern parking area which currently provides 121 of the existing 220 parking spaces.
- 7.5.2 Located within the Edge of Centre Gunnels Wood Road Employment Area and due south of the Leisure Park, the site is also located immediately adjacent the town centre area of the adopted District Plan proposals map and emerging Local Plan proposals map. Stevenage Train Station is located north east of the site approximately 300m away, the Bus Station due west and a further 100m beyond the train station. Several bus stops are in close proximity off

Gunnels Wood Road (300m) and Six Hills Way to the east (500m) and accessible footpath and cycle links are due south of the site, along Six Hills Way linking west and east and to the town centre. The site is therefore considered to be in a highly sustainable location.

- 7.5.3 Paragraph 7 of the National Planning Policy Framework (NPPF) (2019) states the purpose of the planning system is 'to contribute to the achievement of sustainable development'. Achieving this through the 'economic', 'social' and 'environmental' objectives, the presumption is always in the favour of sustainable development. Paragraph 11 of the NPPF clearly defines that for decision-taking this means 'approving development proposals that accord with an up-to-date development plan without delay.
- 7.5.4 The Emerging Local Plan is considered the most up to date plan for determining applications and despite the holding direction preventing its adoption, significant weight is being given to its policies. Policy SP3 seeks to promote the creation of a strong and competitive economy, supporting the continued remodelling of Gunnels Wood to meet modern requirements and provide a high quality and attractive business destination. The Design and Access Statement which accompanies the application suggests the proposal being advanced by the IET is consistent with these strategic objectives. Furthermore, the transport statement suggests that the Council would be preventing growth of the IET by refusing the additional parking sought.
- 7.5.5 The Council is not minded to agree with these statements. The proposal does not include the provision of additional B1 floorspace (which would be supported) and focuses on the refurbishment and reinvestment of the existing floorspace. Whilst this may seek to upgrade the existing facilities it is largely required because of how the IET operates from the site. The supporting information suggests that the IET currently occupy the building at a ratio of between 10.1 and 12.4m<sup>2</sup> of floor space per employee based on their figure of 505 employees. The national average for an office use is 13m<sup>2</sup> per employee (Employment Density Guide 3<sup>rd</sup> Edition). Based on the figures provided in the Transport Statement the numbers of staff operating out of Michael Faraday House are set to increase to approximately 597 over the next five years. This would reduce the square meterage to between 8.6 and 10.5m<sup>2</sup>, potentially some 5m<sup>2</sup> below the national average. The Design and Access Statement suggests that because the IET are operating at a significantly higher staff density that some leeway should be applied to the corresponding parking standards requirement applied to the site.
- 7.5.6 Policy T15 of the adopted District Plan states that car parking provision should be made at, or below, the maximum provision which is specified in the Council's adopted standards. Policy IT5 of the emerging Local Plan states that planning permission will be granted where proposals comply with the parking standards set out in the plan. The Council's Car Parking Standards set out the requirements for B1(a) offices as 1 space per 30m<sup>2</sup> of gross floor area and for B1(b) research & development, high-tech / B1(c) light industry as 1 space per 35m<sup>2</sup> of gross floor area. Furthermore, given the sustainable location of the site (which is located in accessibility zone 1 as set out in the Council's car parking supplementary planning document), this allows for a reduction in the level of car parking to between 0 and 25% of the maximum requirement.
- 7.5.7 Michael Faraday House has a gross floor area of 6276m<sup>2</sup> (although the TS only suggests a GEA of 5110m<sup>2</sup>) which would have a parking provision requirement of 52 spaces based on the adopted parking standards and zoning reduction. This is confirmed in the Design and Access statement submitted. Currently the site has an overprovision of 168 spaces and is proposed to have an overprovision of 250 spaces if the MSCP were to be constructed. The proposal is, therefore, in clear conflict of the Council's adopted parking standards.
- 7.5.8 Paragraph 105 of the NPPF identifies the criteria LPA's should take into account when setting local parking standards, which are –
- a) The accessibility of the development;
  - b) The type, mix and use of the development;

- c) The availability of and opportunities for public transport;
- d) Local car ownership levels; and
- e) The need to ensure an adequate provision of spaces for charging plug-in and ultra-low emission vehicles.

This is followed up in paragraph 106 of the NPPF by stating that 'maximum parking standards should only be set where there is clear and compelling justification that they are necessary for managing the local road network. The Local Highway Authority have confirmed that the proposed additional vehicle numbers would not have any undue impact on the existing highway network, as at least 50% of the number of additional cars proposed are already on the highway network as the IET currently rents approximately 40 car parking spaces from a site off Gunnels Wood Road to the west of the site.

- 7.5.9 Whilst the Council's current parking standards were set in 2012 and are based on maximum standards, in line with the criteria of paragraph 105 of the NPPF, it is considered the assessment of the proposal using these figures is justified. The applicant fails to fully appreciate the siting and sustainability of the site adjacent to the town centre and in close proximity to various non-car modes of transport. Furthermore, the existing car parking levels on site are well over the maximum allowance calculated from the adopted parking standards. The justification provided by the applicant is not considered compelling enough to argue the need for the additional spaces, and providing these spaces to meet the parking demand would appear to undermine the IET's efforts to reduce car travel to the site.
- 7.5.10 Furthermore, the argument that the Parking Provision SPD fails to take into account the individual demands of the site based on the high occupancy level, because it uses floorspace and not staff levels is not a substantive planning argument. The personal circumstance of the applicant/business is not a material planning consideration, and it is the IET's choice to operate the way they are on site. The applicant further argues that the rise in staff numbers over the years has brought with it an additional demand for parking spaces, and that the demand is likely to further increase as staff numbers are expected to grow over the next few years. However, using the figures provided in the Transport Statement, the site will never be able to meet the demand, and thus will always find itself in a situation where parking demand is greater than parking provision on site.
- 7.5.11 Notwithstanding the above, the applicant has undertaken a parking survey on site, and a staff survey to determine the current travel patterns of the staff at the IET. These details were updated following a second staff survey at the request of the Council. The results can be seen in the table below.

Table 1 - MFH Method of Travel for Work

Mode	Percentage (%)
Car Driver	76%
Car passenger / Car Share	2%
Train	11%
Bus	2%
Cycle	3%
Walk	6%
Motorcycle	0%

- 7.5.12 Further information contained within the Transport Statement Addendum shows figures representing four different scenarios. The first scenario shows the current situation in respect of staff numbers (505), car users (76%), car parking spaces (220) and parking demand (345). The results show the current stress on car parking spaces at 157%, with an additional 125 car parking spaces required above the current on site provision.
- 7.5.13 Scenario two shows the proposed outcome should the staff numbers increase to 597 with the same number of car users (76%) and car parking spaces (220). The increase in staff numbers would increase the parking demand figure to 408 and thus the percentage stress for car parking spaces is 185%.
- 7.5.14 Scenario three represents the proposed higher staff number (597), car parking spaces including the MSCP (302) and a car users percentage of only 56% (20% reduction in car users) which indicates the total car parking demand of 301 space. This would be in line with the proposed 302 spaces on site should the MSCP be constructed. However, the presentation of these figures in the Transport Statement Addendum is irrelevant as the proposal is not for a 20% reduction in car users nor would a reduction of this level is likely to be achievable based on the TP measures proposed.
- 7.5.15 The last scenario shown represents all the proposed figures in respect of car parking spaces including the MSCP provision (302) the 10% reduction in car users as proposed by the TP (66%) but with the existing staff numbers (505). This scenario shows a parking stress of 99% with a parking demand of 300 car parking spaces compared to an on-site provision of 302 spaces. This figure is satisfactory should the staff numbers never increase on site. However, given the lengths to which the applicant has advocated that the staff numbers will increase to 597 from 505 employees, this scenario fails to appropriately address this increase in numbers on the overall parking demand when factoring in the additional provision of parking from the MSCP and the proposed 10% reduction in car users.
- 7.5.16 To understand the full impact of the proposal on parking stress and the correlation between on-site provision and car parking demand, Table 2 below has been produced by the Council to illustrate the numbers relevant to the actual proposal. These include the proposed staff numbers, car users figure including a 10% of modal shift of the existing number of staff who drive to work (as proposed in the TP) and the proposed number of car parking spaces on site which includes those within the MSCP.

Table 2 – Car Parking Demand of increased staff numbers and 10% modal shift

	Future with proposed car park and with anticipated increase in No. of staff with TP modal shift of 10%
Number of staff	597
Allowance for leave (annual, sick, etc)	-10%
Percentage who drive to work	66%
Car parking demand (vehicles)	354
Available car parking spaces	302
Car parking stress	117%

- 7.5.17 The results shown in Table 2 clearly show that even with the provision of the MSCP, the 10% reduction in car users to be achieved through the implementation of the TP, and the increased numbers in staff proposed would result in the need for an additional 52 spaces above the proposed 302. This would result in a parking stress of 117%. Additionally it is considered pertinent to note that the figures provided for 'available car parking spaces' include visitor spaces, disabled bays, and electric car charging bays. It is noted that this level of stress is below the existing figure of 157%. However, a forecast parking provision over 100% would find

the IET in the same situation as present, a need for more parking spaces than the site can accommodate. Consequently, it is unclear what the proposal actually achieves, especially as these figures are reliant on the TP achieving a 10% reduction in car users.

- 7.5.18 Policy SP6 'Sustainable Transport' of the emerging Local Plan identifies the need for Stevenage to plan positively for cycling, walking and passenger transport in line with Central Government advice. Given the good network of cycle and footpaths throughout the borough and the proximity of bus stops and the train station to the site, it is highly sustainable and these modes of transport should be promoted by the IET. Whilst the proposal is accompanied by a TP to seek a 10% reduction in car users, the proposed MSCP ultimately promotes the use of private car travel to the site which is unsustainable, contrary to policy and undermines the key values of having the TP.

## **7.6 Acceptability of Travel Plan**

- 7.6.1 The National Planning Policy Guidance (NPPG) defines Travel Plans as 'long-term management strategies for integrating proposals for sustainable travel into the planning process. They are based on evidence of the anticipated transport impacts of development and set measures to promote and encourage sustainable travel (such as promoting walking and cycling).' It further adds that TP's 'should where possible, be considered in parallel to development proposals and readily integrated into the design and occupation of the new site rather than retrofitted after occupation'.
- 7.6.2 The applicant has submitted a TP as part of the proposal to support justification to allow the provision of the 219 space MSCP on site. As mentioned above, the provision of the MSCP and other alterations to the remaining car park and access would see the net increase of 82 parking spaces on site, equating to an overprovision of 250 spaces on site based on the parking provision requirement taken from the Council's adopted Parking Provision SPD.
- 7.6.3 The TP, prepared by Caneparo Associates outlines the aims and objectives of the plan to achieve a 10% reduction in car use. The plan highlights the initiatives and schemes the IET already have in place to promote sustainable modes of transport, and then state the measures the TP seeks to impose to meet its aims and objectives. The important thing to establish here is the difference between what is already being implemented at the IET and the additional measures the TP would introduce.
- 7.6.4 The TP will require the employment of a TP Co-ordinator (TPC) to oversee the implementation of and continued use of the TP throughout the next 5 years. The role of the TPC is outlined in the TP. The IET already carries out sustainable travel measures on site, either trialled or implemented and these include –
- Car share scheme with dedicated on site spaces;
  - Staff lunchtime seminar to discuss alternative methods of transport for commuting;
  - Membership of the SmartGo Stevenage scheme which includes discounts off bikes, rail and bus travel;
  - 'Bike to work week' with free breakfast provided to all staff who participate;
  - Cycle2work scheme for discounted bikes;
  - Rail season ticket loans;
  - Discounted electric vehicle hire;
- 7.6.5 Chapter 5 of the TP states the measures to be employed to encourage sustainable travel. Many of the measures included are the same as those already implemented or at least trialled by the IET. It is not considered, therefore, that these should be seen as new measures to be considered. If they are already being implemented and have not been successful in reducing car travel, it is not understood how they could actively add to the 10% reduction this TP seeks to make to car use. The confirmed additional measures stated in the TP are –

- Notices and information including maps and timetables displayed in prominent locations;
- Free breakfast for staff travelling to work using any sustainable/active mode of transport (reward claimed on a once a month basis);
- Identify with staff problems with external pedestrian and cycle routes and liaise with the LPA and highway authority to encourage maintenance and enhancements as necessary;
- Walk to work week promotion;
- Monitor cycle users and provision on site;
- Upgraded changing facilities and lockers;
- Seek to introduce a 'pool bike' scheme;
- Cycle training sessions;
- Liaise with local cycle shops to discuss the possibility of bicycle discounts;
- Enquire about potential public transport discounts;
- Personalised Travel Plan service;
- 'Smart working' policies to allow working from home.

7.6.6 The proposed measures of the TP have been assessed by the Sustainable Travel Officer at Hertfordshire County Council using their standard pro-forma and the initiatives have been deemed acceptable. However, as mentioned above the key initiatives associated with a TP have already been trialled or implemented at IET with little success based on the current car parking demand figures as shown in Table 1. Additionally many items in the list at 7.6.5 above are not definitive suggesting only that the IET will seek to or enquire to gain information from external parties. These are not actual measures guaranteed to happen. The effectiveness of some of these measures in delivering mode shift are questionable. For example upgrading changing facilities makes no reference to the provision of showers for staff, and the free breakfast offer can only be claimed once a month.

7.6.7 In all, there is no real substance in this document that actually shows or explains the specifics for achieving a very optimistic 10% reduction in car users. Furthermore, whilst the Travel Plan would accord with the County Council's pro-forma, HCC as highway authority are objecting to the application as they consider that the proposed Travel Plan would not address the overprovision of car parking at the site and would, in fact, undermine the success of any Travel Plan.

## **7.7 Other Matters**

### **7.7.1 Drainage**

7.7.1.1 The Local lead Flood Authority has assessed the application and following an initial objection to the scheme have confirmed that the SuDS Drainage Strategy shows the site can be adequately drained and mitigate any potential existing surface water flood risk. If planning permission is granted they recommend that two conditions are imposed on any decision to deal with drainage.

### **7.7.2 Crime Prevention**

7.7.2.1 Objections from the owners of Solar House identified a potential security risk from the proposed MSCP to their site immediately to the east of the site. The Police Crime Prevention Service has assessed the scheme and has no objections to the proposals on crime and safety grounds. The officer advised that the applicant should consider using a secure form of access control to the cycle store, so that if any thefts occur entrance to the store can be established.

## **8. CONCLUSIONS**

8.1 In conclusion the provision of the MSCP and alterations to the existing car park and northern access arrangements to provide a further 82 car parking spaces is considered to be contrary

to national and local policies promoting sustainable development and sustainable transport. The submission of a Travel Plan to reduce car use by staff by 10% is not considered viable to meet its needs and circumvents the significant additional provision of spaces on an already overprovided sustainable site adjacent to the town centre. The proposal would, therefore, be contrary to saved policies TW1, TW8 and T15 of the District Plan Second Review (2004) and emerging policies SP1, SP6 and IT5 of the Borough Local Plan (2016), the Council's Mobility Strategy (2016), the Council's adopted parking Provision SPD (2012) and Hertfordshire County Councils Local Transport Plan LTP4 (2018), and the National Planning Policy Framework (2019) and Planning Practice Guidance (2014 as amended).

## **9. RECOMMENDATION**

9.1 Planning permission be REFUSED for the following reasons:-

1. The provision of the additional 82 car parking spaces would create an overprovision of car parking at the site for the level of B1(a) Office floor space provided when considered against the Council's adopted parking standards and, therefore, would create an unsustainable form of development. This is contrary to saved Policies TW1, TW8 and T15 of the Stevenage District Plan Second Review (2004), emerging Policies SP1, SP6 and IT5 of the Stevenage Borough Local Plan 2011-2031 (2016), SBC Mobility Strategy 2016, the Council's adopted Parking Provision SPD (2012), Hertfordshire County Council's Local Transport Plan LTP4 2018-2031 (2018), and the National Planning Policy Framework (2019) and Planning Practice Guidance (2014 as amended).
2. The provision of the additional 82 car parking spaces is contrary to the principles of sustainable travel including the promotion of alternative modes of travel other than single occupancy vehicles. This is contrary to saved policies TW1 and T15 of the Stevenage District Plan Second Review (2004), emerging policies SP1 and SP6 of the Stevenage Borough Local Plan 2011-2031 (2016), SBC Mobility Strategy 2016, Hertfordshire County Council's Local Transport Plan LTP4 2018-2031 (2018), and the National Planning Policy Framework (2019) and Planning Practice Guidance (2014 as amended).

### **Pro-active Statement**

Planning permission has been refused for this proposal for the clear reasons set out in this decision notice. The Council acted pro-actively through positive engagement with the applicant in an attempt to narrow down the reasons for refusal but fundamental objections could not be overcome. The Council has therefore acted pro-actively in line with the requirements of the National Planning Policy Framework (paragraph 38) and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.

## **10. BACKGROUND DOCUMENTS**

1. The application file, forms, plans and supporting documents having the reference number relating to this item.
2. Stevenage District Plan Second Review 1991-2011.
3. Emerging Stevenage Local Plan 2011-2031.
4. Stevenage Borough Council Supplementary Planning Documents – Parking Provision adopted January 2012.
11. Hertfordshire County Council Local Transport Plan LTP4 2018-2031

12. Central Government advice contained in the National Planning Policy Framework February 2019 and the National Planning Policy Guidance 2014, as amended.
13. Responses to consultations with statutory undertakers and other interested parties referred to in this report.