FULL NAME	DUTY TO COOPERATE	LEGALLY COMPLIANT	SOUND	WHICH PART	WHICH PARAGRAPHS	WHICH POLICY	WHICH POLICY MAP	WHICH DIAGRAM	WHICH TABLE
Mr Gideon Cumming	Yes	Yes	No	Policy		Policy T3: Car Parking Standards			

WHY PLAN NOT SOUND	MODIFICATIONS	HEARINGS	HEARING SESSIONS
Policy T3: Car Parking Standards Presently there are parts of Loughborough where MHOs, division of existing houses and infill developments exacerbate pressure on existing on street parking. Cl 35 of the NPPF states that Plans are 'sound' if they are Justified, Effective and Consistent with National Policy. Positively Prepared – A parking policy should be applied which seeks to meet the areas objectively assessed need. Where this relates to housing (and associated parking) such needs should be assessed using a clear and justified method. No methodology has been proposed to assess a development's impact on on-street parking. Justified – an appropriate parking policy should be applied, and based on proportionate evidence. There does not appear to have been an assessment of the impact of development on on-street parking. Effective – for a policy to be effective I would suggest that a methodology and clearly defined standards are proposed. Consistent with national policy - Cl 104 of the NPPF states that "Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: (e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places. I would suggest that the inclusion of on-street parking assessments is required at the earliest stages of development proposals. The NPPF requires consideration of parking.	I would request that CBC, or the Inspectorate, considers the inclusion of the following in Policy T3, or the Charnwood Parking Standards. 1. Developments are not permitted where there will be excessive detriment to the capacity of on street parking. 2. That excessive detriment is quantified as any application that is anticipated to generate an on-street parking occupancy rate of greater than 85%, or where existing parking occupancy is greater than 85%. Please note that 'Guidelines on the Preparation of Parking Strategies and Management' (Institute of Highways and Transportation, 2006) states that "peak demand should not exceed 85% of supply at parking locations". Above a threshold of 85%, drivers searching for spaces tend to cause congestion. 3, The Council should specify a parking survey methodology (recommend that the council refers to and adopts a policy similar to that set out by Lambeth Council – widely referred to as the Lambeth Method). 4. The LCC Highway standards provide maximum carparking requirements for developments. I suggest that Council has minimum carparking requirements, and that developments that do not meet the minimum requirements are rejected. 5. I would urge the Council to include a requirement that any proposed development includes parking and traffic assessments, particularly within Loughborough town centre.	No	