



East and North Hertfordshire Clinical Commissioning Group  
Charter House  
Parkway  
Welwyn Garden City  
AL8 6LE

31 January 2020

**Handside 3 parking consultation - for the attention of Ka Ng**

Dear Ms Ng,

I am writing on behalf of NHS East and North Hertfordshire Clinical Commissioning Group, in response to the 'Handside 3' parking proposals.

East and North Hertfordshire Clinical Commissioning Group is the NHS organisation responsible for planning, commissioning, paying for and monitoring the quality of the majority of the health services that are used by our 598,000 population. Our 332 staff are based in our Charter House office on Parkway, in the centre of Welwyn Garden City, adjacent to the John Lewis department store. Staff roles vary from senior managers to pharmacists working mainly in care homes and IT technicians who travel between NHS sites. Charter House is also the base for approximately 75 staff from the regional office for NHS England/Improvement.

We have extremely limited on-site parking available and therefore most of our staff members who cannot use public transport therefore rely on public car parks and/or parking in nearby residential roads. Some of the 'Handside 3' parking proposals would significantly reduce the number of parking options available to them.

An important part of having different areas to park in is that it gives those with economic challenges such as a lower salary a fairer choice in the way they get to and from work. Paying for parking every day can put significant pressure on people whose income is on the bottom or lower end of the NHS salary scale. We also attract employees from communities beyond east and north Hertfordshire, and the cost of travelling in every day when they have no other transport alternative such as suitable bus service can be significant. We want to continue to attract people to work at Charter House and would not want anyone to feel they cannot work here because they would be disadvantaged economically.

As the NHS is a significant employer in the centre of town, we also contribute to the local economy on a daily basis, and often after working hours. We have no staff canteen and our staff support the

businesses and services available in the town centre. The location of our office with its choice of parking options is very attractive to potential employees who are looking for a range of facilities open to them when they choose a place of work.

Parking further out of the town centre also gives colleagues the opportunity to contribute to their own health and wellbeing by providing a much-needed walk to and from work sometimes within a long working day. As NHS employees, we want the opportunity to be able to follow the same guidance on movement and exercise that we communicate to the public about.

We have a number of comments, queries and concerns about the Handside 3 consultation process.

### **1. The method and scope of the consultation**

- i. Our organisation works to ensure that local stakeholders are contacted when a public consultation is underway. As a significant local employer and commissioner of local health services, we would appreciate being added to the list of organisations which are consulted as a matter of course about matters of this kind.
- ii. The length of the consultation (four weeks in total, including the Christmas and New Year holiday period) seems very short. We appreciate that our organisation was granted an extension to this period, but note that this extension was not offered more widely to other consultees.
- iii. We were surprised to note that the information on the council's website states that responses must be received in writing – and had to be posted. This seems contrary to the general approach of public organisations, which is to promote digital communications as an inexpensive and accessible way to increase public engagement in local matters. We appreciate that on querying this approach, our organisation was granted permission to email returns. However, this facility was not advertised to the general public. This approach seems hard to justify.
- iv. There is no date given for when the order is likely to come into operation – just a series of 'X' marks.

### **2. The quality of the evidence provided to support the consultation's proposals**

- i) The consultation website <https://welhat.gov.uk/handsideparking> cites a comprehensive parking study conducted in July 2015 as **supporting information** for the proposals in the consultation.

However, the Handside parking study, commissioned by Welwyn Hatfield Borough Council, which involved hourly surveys of available parking at different days and times, concludes on page 20 that:

“there were no reported parking pressures within the wider area. There are sufficient parking spaces as a result of the maximum occupancy being only 30%... The finding of the

parking surveys carried out over a 3-day period show surplus capacity in both the town centre and peripheral area.”

In fact, the summary ‘heat map’ of road occupancy included in the report shows that most of the roads in the consultation area are not at or even near capacity at any time of the day or night, in the week or at the weekend.

ii. One part of the order cites that the proposed restrictions are ‘in order to improve road safety’. In another place the following reasons are cited:

- for the purposes of relieving or preventing congestion of traffic
- for the avoidance of danger to persons or other traffic using the road and preventing the likelihood of any such danger arising.’

The introduction of ‘no parking at any time’ double yellow lines at corners and junctions undoubtedly improves visibility and safety and we would fully support those. However, no evidence is supplied to support the case that converting existing long-stay parking locations, where the public can park from 11am onwards, to maximum two-hour parking locations, such as along parts of Guessens Road, would either reduce congestion or ‘danger arising’.

### **3. The pressure on existing long-stay commuter parking spaces within walking distance of the town centre**

As an organisation, we purchase annual parking passes for our staff in both the Campus East and Campus West car parks. We have been informed that no more parking permits will be issued to our organisation for the Campus East car park and the Campus West car park is frequently full after 9.30am.

Now that Campus East car park has been included in the local plan as a potential housing site, we are concerned that our staff members’ needs for long-stay parking will not be able to be met in the local area if some of the ‘Handside 3’ proposals go ahead.

### **4. Specific feedback on proposals included in the scheme:**

- **Guessens Road – introduction of permit parking on the stretch between numbers 65 and the junction with Handside Lane**

This section of Guessens Road provides useful commuter parking after 11am for our staff. The parking survey showed that this road has sufficient parking for both commuters/shoppers and residents at all of the times surveyed. We would request that the restrictions on this section of the road are unchanged.

The suggested double lines on junctions would seem to have a positive impact on road safety and the introduction of permits in the existing residents’ parking bays would not affect our staff and we therefore have no objection to these.

- **Applecroft Road – introduction of additional ‘no waiting’ restrictions between 9-11am.**

Applecroft Road is the site for the Applecroft Family Centre, which is within Applecroft School. NHS funded speech and language and midwifery drop-in sessions for new parents are held three times a week between 9am and 11am at the Family Centre. The Family Centre offers no parking for visitors and there is no alternative parking in the vicinity for new parents with their babies or small children to access.

The introduction of additional no waiting restrictions at these times would make it difficult for parents to access these classes and therefore we would ask that these additional parking restrictions are reconsidered.

- **Stanborough Green – introduction of ‘residents’ parking’**

A number of our staff park along the length of Stanborough Green, between number 22 and the junction with Lemsford Lane. These staff members walk some considerable distance to the office, which benefits their health and reduces their costs. We would therefore ask that the introduction of residents’ parking restrictions on this stretch of Stanborough Green are reconsidered.

Yours sincerely,

A solid black rectangular box redacting the signature of the sender.

On behalf of NHS East and North Hertfordshire Clinical Commissioning Group