



**Inland Ltd**

**Former Masonic Hall and Old Telephone  
Exchange Site, Elmsleigh Road, Staines**

**Proof of Evidence of Philip Jones, Planning Inspectorate  
Appeal No.: APP/Z365/W/21/3280090**

November 2021

Project Code: 04550

**PJA**  
The Aquarium  
King Street  
Reading  
RG1 2AN  
[pja.co.uk](http://pja.co.uk)





## Version Control and Approval

Version	Date	Main Contributor	Issued by	Approved by
A	27 September 2021	MF / PJ	PJ	PJ
B	26 October 2021	MF / PJ	PJ	PJ
C	02 November 2021	MF / PJ	PJ	PJ

**Prepared for**

**Inland Ltd**





## Contents

Section	Page
<b>I Introduction .....</b>	<b>2</b>
1.1 Qualifications and Experience	2
1.2 Matter at Issue	3
1.3 Format of the Proof	4
<b>2 Planning Policy Position in Relation to Transport .....</b>	<b>5</b>
2.1 Introduction	5
2.2 Spelthorne Borough Core Strategy and Policies Development Plan Document 2009	5
2.3 Other Material Considerations	8
<b>3 Proposed Parking Provision and Management .....</b>	<b>13</b>
3.1 Parking Provision	13
3.2 Parking Management	13
<b>4 Suitability of Proposed Parking Provision .....</b>	<b>15</b>
4.1 Principle of Car Free Living in Staines	15
4.2 Location of the Proposed Development	17
4.3 Benefit of Low Parking Provision	26
4.4 Low Parking Provision and Car Ownership	27
4.5 Alternatives to Private Car Ownership	29
4.6 Existing Parking Restrictions and Parking Survey Results	31
<b>5 Summary and Conclusions .....</b>	<b>35</b>
5.1 Summary	35
5.2 Conclusions	35

## List of Tables

Table 2-1: Spelthorne Residential Parking Standards .....	7
Table 4-1: Consented Developments Containing Car Free Housing .....	16
Table 4-2: Phase 1A Car Park Occupancy Results Adjusted for Unsold Apartment .....	17
Table 4-3: Unrestricted Car Parking Summary .....	32
Table 4-4: Car Parking Availability for Existing Houses .....	33

## List of Figures

Figure 4-1: Car Ownership per Capita in Central Staines (Source DVLA) .....	15
---	----

Figure 4-2: Site location in relation to amenity concentrations within Spelthorne ..... 19

Figure 4-3: Site location in relation to employment concentrations within Spelthorne ..... 20

Figure 4-4: Site Location in relation to public transport accessibility ..... 21

Figure 4-5: Walking catchments around mainline railway stations within Spelthorne. .... 22

Figure 4-6: Bus corridors and associated frequencies within Spelthorne. .... 23

Figure 4-7: Public Transport Catchment from the Proposed Development..... 24

Figure 4-8: Site location in relation to PCT Cycle Corridors..... 25

Figure 4-9: Parking Restrictions ..... 31



## Appendices

Appendix A	2011 Census Car Ownership Information for Staines .....	37
Appendix B	Residential Parking Questionnaire Template.....	38
Appendix C	Enterprise Car Club Confirmation .....	39
Appendix D	Easit Travel Discount Confirmation .....	40



## I Introduction

### I.1 Qualifications and Experience

- 1.1.1 My name is Philip Jones. I am a Chartered Engineer and belong to several professional bodies; I am a Fellow of the Chartered Institution of Highways and Transportation and Member of the Institution of Civil Engineers. I am an Honorary Fellow of the Institute of Highway Engineers and an Academician with the Academy of Urbanism.
- 1.1.2 I am the Chairman of a transport planning, engineering and placemaking consultancy, PJA, which operates from offices in Birmingham, London, Reading, Bristol, Cambridge, Manchester and Melbourne, Australia. We carry out a broad range of work including transport assessments for new developments, planning and designing active travel schemes, parking studies, transport master planning, streetscape schemes and research and training. I have over 35 years' experience in transport planning and engineering.
- 1.1.3 I was one of the principal authors of *Manual for Streets* (MfS), the Department for Transport's guidance on the planning and design of new streets, particularly residential streets. I was also joint editor of *Manual for Streets 2*, published by the CIHT with the support of DfT, which advises on how the principles of MfS can be applied to busier locations. I sit on several Design Review panels, including the Design Council, HS2 and National Highways panels.
- 1.1.4 I am an acknowledged expert in the planning and design of cycling infrastructure and sit on the Department for Transport's Cycling and Walking Investment Strategy Stakeholder Advisory Group, which advises DfT on cycling matters. I was Editor for the Welsh Government's *Active Travel Design Guidance* which provides statutory advice on the design of cycling infrastructure under their Active Travel Act of 2013. More recently I led the production of DfT guidance for local highway authorities on the preparation of Local Cycling and Walking Infrastructure Plans and was lead writer for DfT Local Transport Note 1/20, 'Cycle Infrastructure Design', published in July 2020. In 2020-21 I have worked with DfT and active travel groups on forthcoming changes to the Highway Code to improve safety for pedestrians and cyclists.
- 1.1.5 I have significant experience in relation to parking provision for new developments having carried out research for Government on residential parking, published in 2007. Using the methodology set out in that report I went on to work on the preparation of demand-based parking standards for several local authorities including Oxfordshire County Council. I am currently engaged by the Welsh Government to chair a working group preparing statutory and operational guidance for local authorities to enforce against pavement parking in Wales.
- 1.1.6 PJA was instructed by Inland Ltd on this project in 2019 to provide transport planning advice to support a planning application for residential development at Elmsleigh Road in Staines town centre, which was submitted in October 2020.





- 1.1.7 I am familiar with the appeal site, the proposals that are the subject of the appeal, and the relevant planning policy documents. The evidence which I have prepared and provide for this appeal reference APP/Z365/W/21/3280090 in this proof of evidence is true and I confirm that the opinions expressed are my true and professional opinions irrespective of by whom I am instructed.

## **1.2 Matter at Issue**

- 1.2.1 Spelthorne Borough Council gave the following reason for refusal:

*The proposals, by virtue of the height of the two towers and inadequate car parking, represent an unacceptable overdevelopment of the site resulting in a development which is:*

- i) out of character with the surroundings and fails to have due regard to the height of adjoining buildings and land, resulting in a development which would not make a positive contribution to the street scene and would have a detrimental impact on the character of the area and the street scene, and*
- ii) is likely to result in unacceptable parking stress on residential roads in the locality which would be detrimental to the amenity of residential properties, contrary to Policies EN1(a) and CC3 of the Spelthorne Borough Core Strategy and Policies Development Plan Document, 2009, and the Parking Standards Supplementary Planning Guidance, 2011.*

- 1.2.2 The question of the adequacy of the proposed level of car parking is at the heart of the reason for refusal and is addressed in my proof.
- 1.2.3 Pre-application discussions were undertaken with Surrey County Council (SCC) as Highway Authority during which a number of elements of the scheme were agreed including the agreement that the level of car parking would be appropriate for a Town Centre scheme and not result in a Highway Safety Impact. A record of these discussions is included within Appendix A of the Transport Assessment prepared in support of the planning application [CD 1.4].
- 1.2.4 Further discussions with SCC were undertaken following the submission of the application culminating in a final response from SCC dated 25<sup>th</sup> May 2021 raising no objections to the scheme on highways or transport grounds subject to a Section 106 Agreement. [CD 8.1]
- 1.2.5 A draft Statement of Common Ground with SCC on Highways and Transport Matters (SoCGSCC) has been prepared which states there are no outstanding areas of disagreement between the parties and that SCC in their capacity as Local Highway Authority raise no objections to the proposed development. There are no matters of disagreement with SCC.
- 1.2.6 A draft Statement of Common Ground with Spelthorne Borough Council has also been prepared (SoCGSBC) [CD 6.4]. The only areas of uncommon ground between the parties are whether the site is located in a 'highly' accessible location and whether the development provides sufficient parking



provision so as to avoid unacceptable parking stress on residential roads in the locality which would be detrimental to the amenity of residential properties.

1.2.7 This proof therefore focuses on demonstrating that the parking provision proposed as part of the development is appropriate and would not result in unacceptable parking stress and associated detrimental impact on residential amenity.

1.2.8 Importantly, by the term ‘unacceptable’ I do not seek to argue that a development should result in the situation whereby anyone who wants to would be able to park a car in a convenient location off-site if limited parking is provided on-site. The essence of the Government’s sustainability agenda is to provide incentives to maximise the use of transport choices other than the private car, which includes developing at higher densities in locations where such sustainable choices can be made. It would be utterly counter-productive to then facilitate off-site parking.

1.2.9 Thus for parking stress to become ‘unacceptable’ it would need to be demonstrated that it gave rise to meaningful land use harm, sufficient to withhold consent for an otherwise highly sustainable form of development – such as giving rise to demonstrable adverse effects upon highway safety or effects on residential amenity.

### **1.3 Format of the Proof**

1.3.1 The remainder of my proof is divided into four Sections:

- Section 2 sets out the relevant planning policy position in relation to transport;
- Section 3 provides details of the proposed parking provision and associated management strategy;
- Section 4 provides justification of the suitability of the proposed parking provision; and
- Section 5 summarises the proof and provides a set of conclusions.



## 2 Planning Policy Position in Relation to Transport

### 2.1 Introduction

- 2.1.1 In this section I have summarised the statutory planning policy position in relation to the outstanding transport matters. A full summary of relevant planning policy is contained within the evidence of Mr Slatford.

### 2.2 Spelthorne Borough Core Strategy and Policies Development Plan Document 2009

- 2.2.1 The reason for refusal refers to two policies within the Spelthorne Borough Council (SBC) Core Strategy [CD5.2], Policies EN1(a) and CC3.

#### **Policy EN1(a), Spelthorne Borough Core Strategy and Policies Development Plan Document**

- 2.2.2 Policy EN1(a) of the Spelthorne Borough Core Strategy and Policies Development Plan Document states: *“Proposals for new development should demonstrate that they will: a) create buildings and places that are attractive with their own distinct identity; they should respect and make a positive contribution to the street scene and the character of the area in which they are situated, paying due regard to the scale, height, proportions, building lines, layout, materials and other characteristics of adjoining buildings and land”*
- 2.2.3 This policy is not related to issues surrounding parking stress and therefore has not been considered further within this proof.

#### **Policy CC3, Spelthorne Borough Core Strategy and Policies Development Plan Document**

- 2.2.4 Policy CC3 of the Spelthorne Borough Core Strategy and Policies Development Plan Document states: *“The Council will require appropriate provision to be made for off street parking in development proposals in accordance with its maximum parking standards. In considering the level of provision the Council will have regard to:*
- a *the anticipated demand for parking arising from the use proposed, or other uses to which the development may be put without needing planning permission,*
  - b *the scope for encouraging alternative means of travel to the development that would reduce the need for on-site parking. This will be particularly relevant in areas well-served by public transport,*
  - c *the impact on highway safety from potential on-street parking and the scope for measures to overcome any problems,*
  - d *the need to make adequate and convenient provision for disabled parking.*



*The Council will require the provision of sufficient, safe, weatherproof, convenient and secure cycle parking within developments to assist in promoting cycle use."*

- 2.2.5 Within the subsequent sections of this proof I set out why the proposed level of parking is appropriate and fully in line with the provisions of Policy CC3.

### **Spelthorne Parking Standards 2011**

- 2.2.6 The Spelthorne Borough Council Parking Standards Supplementary Planning Guidance were originally adopted by resolution of the Council's Executive on 12 June 2001 and set out maximum parking standards for residential developments in line with national guidance at the time.

- 2.2.7 In September 2011 SBC agreed a 'Position Statement' on how Policy CC3 should be interpreted in the light of the removal from national planning guidance of the requirement for residential parking standards to be expressed as a 'maximum'. The position statement concluded that

*"The Council will give little weight to the word 'maximum' when applying Policy CC3 and its residential parking standards except in town centre locations where, for reasons of good access to public transport, there is a genuine and convincing case to make a lesser provision and which still meets the other requirements of Policy CC3".*

- 2.2.8 This position statement has not been promulgated as an amended DPD nor as an SPD. The weight to be afforded to this statement will be addressed in the Appellant's planning evidence. I am advised that the interpretation of policy is a matter of law and a local planning authority cannot seek to resolve to interpret policy in a way which is not supported by the words which are used. This will be addressed, if necessary, by counsel in legal submissions. At all events I am advised by my planning colleague that greater weight should be afforded to properly adopted policy which is consistent with the development plan than the position statement which has no status as a local development document, has not been subject to consultation and is not endorsed by the local highway authority.

- 2.2.9 The updated Spelthorne Borough Council Parking Standards Supplementary Planning Guidance (SPG, 2011) [CD5.6] explains in Section 1 the status of the document and the reasons for updating it.

- 2.2.10 Para 1.5 of the document notes that:

*The Council's residential parking standards were based on detailed local survey work on a range of existing residential developments in the Borough to establish the amount of parking space that was required. This survey work established the minimum number of spaces that were needed albeit national policy required them to be expressed as a maximum. An exception is town centre locations such as Staines, where good accessibility to public transport may justify a lower provision.*



2.2.11 The document goes on to set out in Table 2-1 the minimum residential parking standards which will be applied, subject to exceptions which are given in Note 5.

**Table 2-1: Spelthorne Residential Parking Standards**

	Car parking spaces per dwelling	Cycle parking spaces per dwelling
One-bedroom private dwelling	1.25	1
One-bedroom affordable dwelling	1	1
Two-bedroom private dwelling	1.5	1
Two-bedroom affordable dwelling	1.25	1

2.2.12 Note 5 to these standards states:

*“5. Reduction of parking requirements will normally only be allowed in the following situations:*

- i Within the Borough's 4 town centres defined in the Core Strategy and Policies DPD where public transport accessibility is generally high. Any reduction will be assessed against the following relevant factors:*
  - a. Distance from public transport node i.e. main railway station, bus station, main bus stop;*
  - b. Frequency and quality of train service;*
  - c. Frequency and quality of bus service;*
  - d. Availability and quality of pedestrian and cycle routes;*
  - e. Range and quality of facilities supportive of residential development within a reasonable walking distance (or well served by public transport) e.g. retail, leisure, educational, and possibly employment.*
- ii Units specifically designed for single person occupation.*
- iii Residential conversions where there are limited off-street parking opportunities e.g. floors of accommodation above shops.*
- iv In Conservation Areas, where the character or appearance of the Conservation Area would be harmed by the impact of parked cars.”*

2.2.13 The General Notes to the document includes a section entitled ‘Interpreting the Standards’, which includes the following Note 1:

- “1. Car parking provision below the standards set out in this document may be acceptable in areas well-served by public transport, particularly town centres. In determining the appropriate scale of reduction on the maximum standard regard will be had to:*
- a. The existing accessibility of the site by non-car-based modes of travel.*



- b. *Any committed proposals to improve the accessibility of the site by non-car-based modes of travel, including relevant provisions of Green Transport Plans accompanying development proposals.*
- c. *The existence of measures to control on-street parking in the vicinity of the site, including measures secured as part of development proposals.*
- d. *In the case of business development, the extent of any essential car user requirements necessary for the operation of the business.*

*The business standards include specific consideration of development in the commercial area of Staines town centre.*

*Where improvements in accessibility by non car-based modes, or controls over on-street parking, are necessary to enable a development to go ahead then development proposals will be expected either to contribute to the cost of such improvements, or to incorporate specific improvements into the development."*

- 2.2.14 Within the subsequent sections of this proof I set out why the proposed level of parking is appropriate and that the proposed reduction from the maximum parking standards that normally apply in Spelthorne is fully in accordance with the provisions of the SPG, as well as national policy.

## 2.3 Other Material Considerations

### National Planning Policy Framework (NPPF)

- 2.3.1 At the heart of the NPPF [CD 4.1] is a presumption in favour of sustainable development. This is reflected in Part 9 of the document which deals with Promoting sustainable transport, where in Paragraph 105 it notes that:

*'Significant development should be focused in locations which are, or can be made sustainable, through limiting the need to travel and offering genuine choice of transport modes.'*

- 2.3.2 As is demonstrated below, this site has a very high level of accessibility by sustainable transport modes. Indeed, there are few sites in Spelthorne which would be more sustainable in transport terms.

- 2.3.3 NPPF Para 110 advises that in considering development proposals, it should be ensured that:-

- a *'appropriate opportunities opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b *safe and suitable access to the site can be achieved for all users;*
- c *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*



d *any significant impact from the development on the transport network (in terms of capacity and congestion) or on highway safety can be cost effectively mitigated to an acceptable degree.'*

2.3.4 The development fully accords with all these requirements.

2.3.5 Furthermore, Paragraph 111 states:

*'Developments should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'*

2.3.6 It has not been suggested by any party to this inquiry that there would be an unacceptable impact on highway safety, or that there would be an impact on the road network which would be severe. It is not altogether clear what harm therefore is alleged to arise from the alleged parking stress. As I note above, merely adding to the competition for on street parking is not of itself land-use harm which warrants withholding consent for otherwise sustainable development.

2.3.7 Paragraph 112 notes that

*'Within this context, applications for development should:*

- a *Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b *Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c *create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d *Allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e *Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.'*

2.3.8 The development fully accords with these requirements.

2.3.9 In relation to car parking in particular, Para 107 of the NPPF states that:

*'If setting local parking standards for residential and non-residential development policies should take into account:*



- 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 other ultra-low emission vehicles.*

2.3.10 Within this proof I will demonstrate that the proposed parking provision has properly taken into account the requirements of NPPF Para 107; will not result in an unacceptable impact on highway safety; and that the residual cumulative impacts on the road network will not be severe. Pursuant to national policy, the development should therefore not be refused on highways grounds.

### **Surrey County Council Vehicular and Cycle Parking Guidance (2018)**

- 2.3.11 The latest edition of SCC's Vehicular and Cycle Parking Guidance [CD 5.7] was published in January 2018, although the car parking elements of the document have not changed since the 2012 version. The SCC parking guidance has been prepared in accordance with the NPPF in that it recommends flexibility and application according to local circumstances.
- 2.3.12 Whilst not adopted by SBC, the SCC guidance does merit consideration as part of this appeal as an authoritative statement by the local highway authority, in that it is in accordance with current national policy and also includes guidance on elements such as the charging of electric vehicles, which is not contained within the SBC adopted SPG.
- 2.3.13 In the Introduction to the document SCC note that: *'At a local level, concerns relating to deficiencies in car parking provision leads to a desire amongst local communities for more car parking spaces. On these occasions, the County Council might express concern about catering for car parking demand particularly in an area that might already be suffering from congestion'*.
- 2.3.14 No such concerns have been expressed by SCC in this case as there is no proposal for an increased number of car parking spaces. Nevertheless, it is clear SCC considers that providing more car parking than can be justified will actively lead to more car use, thus exacerbating congestion, and so undermining other policy objectives.
- 2.3.15 In relation to residential car parking the SCC guidance recommends one car parking space per unit for one- and two-bedroom town centre flats, with a requirement for a minimum of one cycle parking space per flat. The document notes however that *'reduced or even nil provision may be appropriate in support of demand management and the most efficient use of land'*. The guidance also notes that in connection with residential development *'It is unlikely that objections [by SCC] would be raised on amenity grounds of a shortfall in parking...'*





- 2.3.16 The Spelthorne SPG does not make reference to electric vehicle charging points (EVCPs). However, the Surrey guidance requires the following for flatted developments:
- 20% of available spaces to be fitted with a fast charge socket of 7kW.
  - A further 20% of available spaces to be provided with power supply to provide additional fast charge socket, with a feeder pillar or equivalent permitting future connection.
- 2.3.17 As will be shown in subsequent sections of this proof, the proposed development is in accordance with the up-to-date county-wide parking guidance. This guidance clearly demonstrates that the County Council, in their capacity as highway authority, consider that low car development can be appropriate within Surrey.
- 2.3.18 It is demonstrated in the following sections that the proposed site, located as it is in the centre of one of the principal towns in the district, is a location where such development is not only acceptable but is to be actively encouraged.

### **Surrey County Council Parking Strategy 2020**

- 2.3.19 Surrey County Council's third local transport plan (LTP3) is called the Surrey Transport Plan. The plan came into effect in April 2011 and looks ahead to 2026. An updated version of the Parking Strategy, which forms a component of the Surrey Transport Plan was prepared in January 2020. [CD 5.9]
- 2.3.20 The Parking Strategy acknowledges that Surrey has a high level of car ownership and use, relative to other counties in England and that certain towns suffer from severe congestion, which is an issue that can be influenced by parking provision and regulation. The vision of the parking strategy is to:
- "Provide parking where appropriate, control parking where necessary"*
- 2.3.21 In relation to the management of parking the preferred strategy of the county council, as set out in section 3.4 of the document is to:
- *introduce parking controls where necessary to make best use of the space available*
  - *encourage the use of off street parking*
  - *work closely with schools and other agencies to ensure the development and implementation of robust and effective school travel plans*
  - *ensure adequate loading and unloading and disabled driver parking provision in all new parking schemes*
  - *consider sustainable travel measures to reduce demand for on street parking, particularly in busy town centres*
  - *consider ways to improve access to retail businesses*



- *consider the use of red routes to improve traffic flow*

- 2.3.22 In terms of new development, the County's Parking Strategy acknowledges that planning applications and decisions are a matter for borough and district councils; however, it refers to the County's guidance on how much parking should be provided, which is discussed above.
- 2.3.23 As will be established in subsequent sections of this proof, the proposed development will positively support the aims of the SCC Parking Strategy through the limited provision of on-site parking, the provision of sustainable travel benefits to both existing and future residents and facilitating the potential for on-street parking controls to manage existing parking in the local area, should it be decided this is necessary.



### 3 Proposed Parking Provision and Management

#### 3.1 Parking Provision

3.1.1 The proposed development provides the following:

- 38 standard car parking spaces
- 10 accessible car parking spaces
- 2 motorcycle parking spaces
- 208 secure resident cycle parking spaces
- 12 short stay visitor cycle parking spaces
- 2 car club parking spaces.

3.1.2 Upon occupation of the development 20 car parking spaces within the development will be equipped with fast charging infrastructure for electric vehicles. Suitable cabling and ducting will also be provided to ensure that the remainder of spaces can be electrified as and when necessary, as demand arises. Provision will also be made for the charging of e-bikes within the secure cycle storage.

#### 3.2 Parking Management

3.2.1 The scheme would offer residential accommodation for those people who would choose to live in this highly sustainable, town centre location and do not need a car. The scheme will be marketed as a car free development in order to attract that demographic, which is not presently typical of the general population of Spelthorne as a whole.

3.2.2 It is acknowledged that people's circumstances can change such that car free living may not be appropriate, possibly for a limited period of time. The provision of a small amount of parking therefore allows a degree of flexibility in car ownership amongst the occupiers, which would be carefully managed.

3.2.3 The ownership and control of the car park will remain with the developer and a robust parking management strategy will be put in place to act as a disincentive for residents taking parking spaces unless they are needed.

3.2.4 The key elements of the anticipated Parking Management Strategy would be as follows:

- Whilst marketed as a car free scheme, any residual parking spaces would be available on a first come first served basis for residents moving into the scheme who presently own a car, with a view to providing time for residents to divest themselves of their vehicles;
- Spaces would be leased for a minimum term of three months and then on a rolling basis. This gives the flexibility for someone to move into the development with a car but then give up their



space when their lifestyle has adapted to the town centre location, making use of the public transport and active travel networks for most journeys; and using a car-club vehicle when a journey by car is necessary.

- The pricing of the leased parking will be set to reflect the true cost of the space and is intended to act as a significant disincentive to retaining a space if a vehicle is not being used regularly. At present an indicative cost of £140 per month is being considered, which is similar to the cost of long-term parking at the Kingston Road car park, but this is likely to be subject to a steady increase.
- The leases for spaces will contain a break clause to enable the management company to maintain flexibility regarding the future use of the parking spaces and to encourage residents to give up spaces that they no longer require.
- If all of the parking spaces are taken up, a waiting list for spaces would be drawn up.
- Disabled spaces would be reserved for drivers with a registered disability.
- The car parking would be split pro-rata with tenure, making 34 spaces for the market flats and 14 for the affordable flats. The parking for the affordable units would still be subject to an additional lease charge, which is to be determined.
- No visitor parking will be provided as part of the development. Any visitors wishing to drive to the site would need to make use of the surrounding town centre public car parking.

3.2.5 In addition to the provision of 48 spaces within the under-croft car park on the site, a further two spaces are provided within the public realm improvements for car club vehicles that will be funded by the development. Two loading bays have also been provided, one in close proximity to each building entrance, to ensure that suitable short-term parking is available for delivery and servicing vehicles. These will accommodate two large vehicles or four smaller vans.

3.2.6 The Travel Plan will be updated to include the principles of the parking management strategy set out above. This will include a mechanism for the parking to be monitored and the results fed back to SBC and SCC to enable their regular review, with amendments to the plan as necessary.

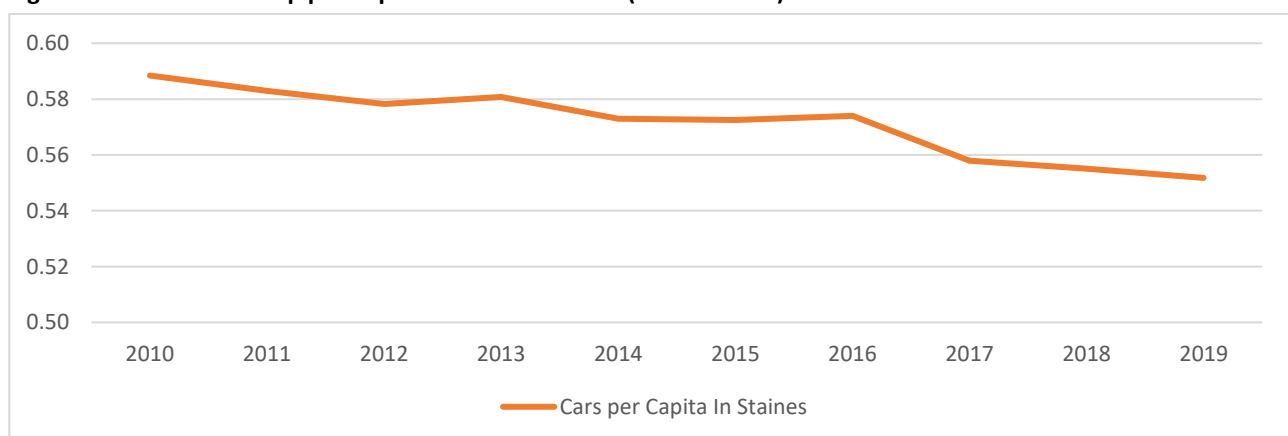


## 4 Suitability of Proposed Parking Provision

### 4.1 Principle of Car Free Living in Staines

- 4.1.1 The development will be marketed as providing car free accommodation for those people for whom living in this highly accessible location without a car is an attractive option. In my experience it is difficult to think of a more obvious site in Spelthorne where housing should be promoted on this basis.
- 4.1.2 The 2011 Census Car Ownership data (the most recently-available Census data) for Spelthorne (Table KS404EW) shows that across the Borough as a whole an average of 1.42 cars were owned per household. There is however significant variation in the data as 5,861 households (15% of total households) did not own a car. Utilising the same dataset for the existing residential development within a one-mile radius of Staines Town Centre identified that 1,576 households (19% of total households) did not own a car. A copy of this data, including a list of output areas used in the assessment, has been included within **Appendix A**.
- 4.1.3 The 2011 Census data thus demonstrates that car-free living is an option for a significant proportion of existing residents within Staines and across Spelthorne as a whole.
- 4.1.4 Information is also available from the Driver and Vehicle Licensing Agency (DVLA) on the number of vehicles registered within a specific geographic location<sup>1</sup>. This data source has been examined to identify the total number of registered vehicles within central Staines<sup>2</sup>. Corresponding population data has also been identified so that a car ownership per capita can be identified. The resultant trend in car ownership per capita within Staines is illustrated in Figure 4-1.

**Figure 4-1: Car Ownership per Capita in Central Staines (Source DVLA)**



<sup>1</sup> <https://transport-behaviour.shinyapps.io/application/>

<sup>2</sup> Central Staines taken as LSOAs E01030735; E01030736; E01030737; E01030738; E01030766;



- 4.1.5 As illustrated in Figure 4-1, average car ownership per capita in central Staines has reduced by over 6% in the period between 2010 and 2019, with a clear downward trajectory further demonstrating that car free and low car lifestyles are increasingly possible within the town.
- 4.1.6 The national trend of declining car ownership amongst younger people is also identified in a report prepared by University of Oxford and UWE Bristol [CD 8.5] which states: *“changes in choices in early adulthood have long-term implications: the lower car use of young adults seen in the early 1990s is still seen in this cohort who are now in their forties”*, continuing to state that *“given that many young people have become accustomed to a lifestyle in which private car use is less central than it has been for previous generations, it is also likely that significant differences in travel behaviour will remain throughout their lives (representing a long-term cohort effect)”*.
- 4.1.7 Precedent has also already been established for some car free development within Staines, with SBC approving a number of major schemes that would result in a proportion of car free housing in the town centre. A summary of these consented schemes is set out in Table 4-1 below. The final column shows the minimum number of car-free dwellings in each of the developments. If more than one space was allocated to some dwellings the number of car-free dwellings would be higher.

**Table 4-1: Consented Developments Containing Car Free Housing**

Development	Number of Units	Number of Parking Spaces	Parking Ratio	Minimum Number of Car Free Dwellings
Charter Square Phase 1A	260	217	0.83	43
Charter Square Phase 1B	104	27	0.25	77
Eden Grove	467	346	0.74	121
Bridge Street Car Park	205	134	0.65	71
Renshaw Industrial Estate	275	248	0.91	27
<b>Total</b>				<b>339</b>

- 4.1.8 Whilst for the majority of the above schemes the parking ratios are higher than proposed at the appeal site, the important fact is that cumulatively these developments will result in at least 339 dwellings being provided without access to a car parking space, and therefore highly likely to be occupied by a car-free household. In granting permission for these developments SBC has already accepted the principle that it is possible for significant numbers of households to live within Staines without a car parking space and without causing unacceptable parking stress on the surrounding road network. It is presumed that the Council are arguing for higher (although presently unknown) number of spaces, but that it still accepts that for most residents car-free living is appropriate. It is not known why that is said to be unacceptable at the level proposed.
- 4.1.9 Further evidence that there is strong demand for car free housing in Staines is available in the form of parking surveys undertaken at the Charter Square Phase 1A development. This information is presented within a Parking Provision Technical Note prepared in May 2021 by Velocity Transport Planning [CD 8.3] in relation to the proposed Charter Square Phase 1C planning application



(Planning Reference 20/01112/FUL). Chapter 10 of CD 8.3 sets out the results of daytime parking surveys undertaken on 11<sup>th</sup> May 2021 and overnight surveys undertaken on the 13<sup>th</sup> May 2021.

- 4.1.10 As shown in Table 4-1 above a total of 217 parking spaces are provided for 260 residential units within the Phase 1A development. All but five of the development units have been sold. Table 10.2 of CD 8.3 provides summarised results of the car parking surveys that have been adjusted to account for the unsold units. This information is given in Table 4-2 below.

**Table 4-2: Phase 1A Car Park Occupancy Results Adjusted for Unsold Apartment**

	Tues 11 <sup>th</sup> May (Daytime Survey)	Thurs 13 <sup>th</sup> May (Night Time Survey)
Car Park Capacity	217	217
Adjusted Car Park Occupancy (Vehicles)	95	125
Adjusted Car Park Occupancy (Rate)	44%	57%
Available Spaces	122	92

- 4.1.11 This demonstrates that there even where a significant quantum of car parking is available, it is not being fully taken up by residents. Whilst the recorded parking demand at Phase 1A equates to 0.48 spaces per dwelling, a lower ratio would be expected at the proposed development given that, as set out above, it will be marketed specifically to attract resident seeking a car free lifestyle, and with spaces subject to an ongoing rental fee.
- 4.1.12 Based on the above it is clear there is a significant and growing proportion of households within Staines that do not require car parking. There is therefore a sizeable market of prospective occupiers for whom a lack of parking would not present an issue or result in an impact on surrounding residential amenity. Facilitating and encouraging this is in line with National Policy.

## 4.2 Location of the Proposed Development

- 4.2.1 As set out in Section 2, the Spelthorne Parking SPG [CD 5.6] states that reductions of parking requirements will normally only be allowed within the Borough's four town centres (of which Staines is the largest) where public transport accessibility is generally high. Any reduction will be assessed against:

- Distance from public transport nodes;
- Frequency and quality of train service;
- Frequency and quality of bus service;
- Availability and quality of pedestrian and cycle routes;
- Range and quality of facilities supportive of residential development within a reasonable walking distance (or well served by public transport), e.g. retail, leisure, educational and possibly employment.



4.2.2 Full details of the accessibility of the site are contained within Section 3 of the submitted Transport Assessment [CD 1.4]. In summary:

- The site is located within Staines Town Centre with a large number of local amenities accessible within an easy 20-minute walk distance; including schools, doctors' surgeries and convenience/comparison retail stores.
- Staines railway station is an 11-minute walk from the site, which provides regular services to Waterloo, Windsor, Reading, and Weybridge. These operate frequently, with up to 11 trains per hour running to London Waterloo at peak times.
- The site is 300m from Staines Bus Station (approximately four minutes' walk), where frequent bus services with long operational hours to local destinations can be accessed, as well as buses to Ashford Hospital and Heathrow.
- There is good provision for cyclists within the vicinity of the site including National Cycle Network Route 4 that passes within 120 metres. There is also a network of local and regional cycle routes in and around Staines town centre.

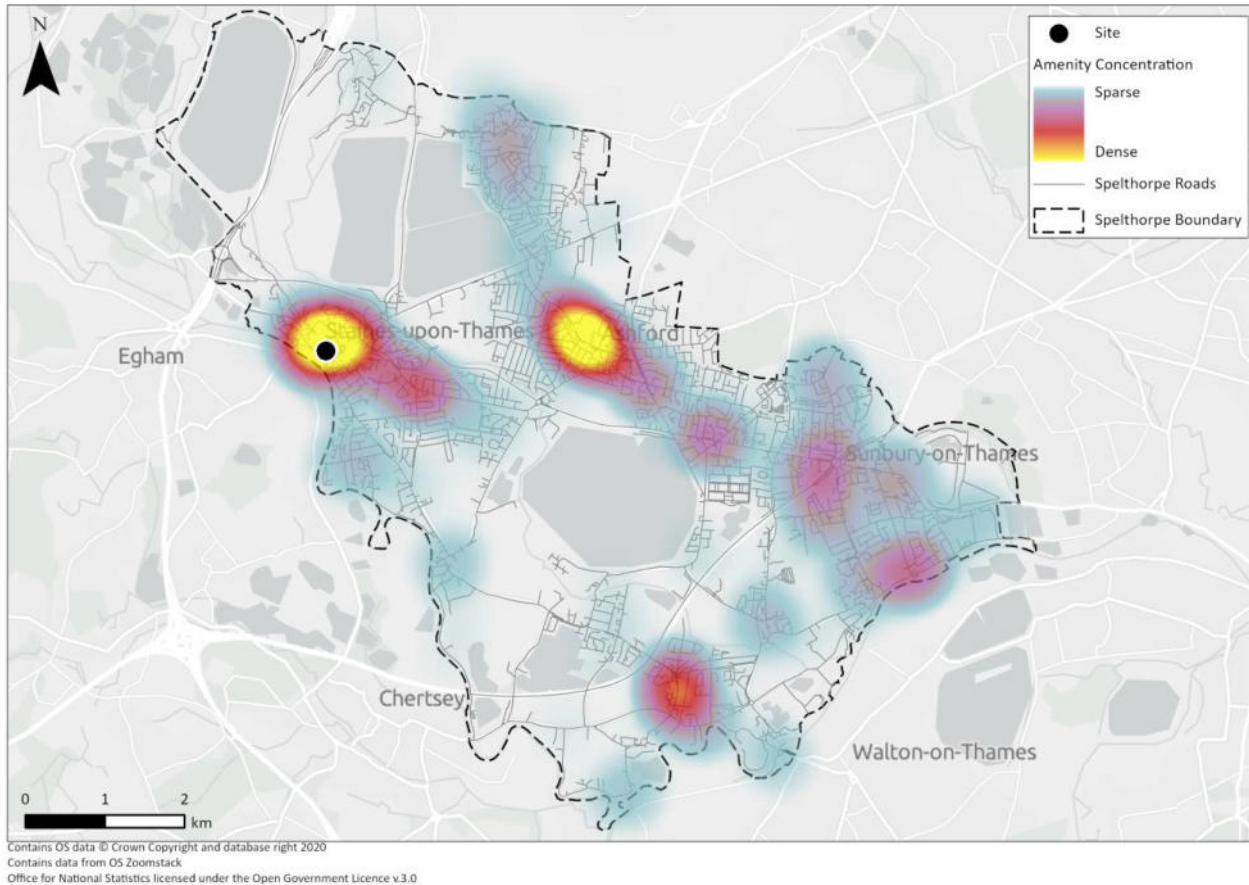
4.2.3 To further emphasise the highly accessible location of the site relative to other areas in Spelthorne, a series of plans has been prepared examining the proximity to amenities (retail, education, leisure and health), concentrations of employment, proximity to public transport services and accessibility by cycle





4.2.4 Figure 4-2 shows the location of the site in relation to concentrations of existing amenities<sup>3</sup> across Spelthorne and clearly demonstrates that the proposed development is centrally located within one of the two primary concentrations of amenities within the borough.

**Figure 4-2: Site location in relation to amenity concentrations within Spelthorne**



<sup>3</sup> Amenities mapped are NHS GP Surgeries, Pharmacies, Hospitals, Schools and Retail, Leisure and Amenity points obtained from Open Street Map Datasets



4.2.5 Figure 4-3 shows the location of the site in relation to concentrations of employment<sup>4</sup> within Spelthorne. This again clearly demonstrates that the proposed development is centrally located within one of the two primary concentrations of employment within the borough. The other area of employment concentration within the borough is the International Centre for Business & Technology (operated by British Petroleum) where opportunities for co-locating residential development are limited by surrounding greenbelt designations.

**Figure 4-3: Site location in relation to employment concentrations within Spelthorne**

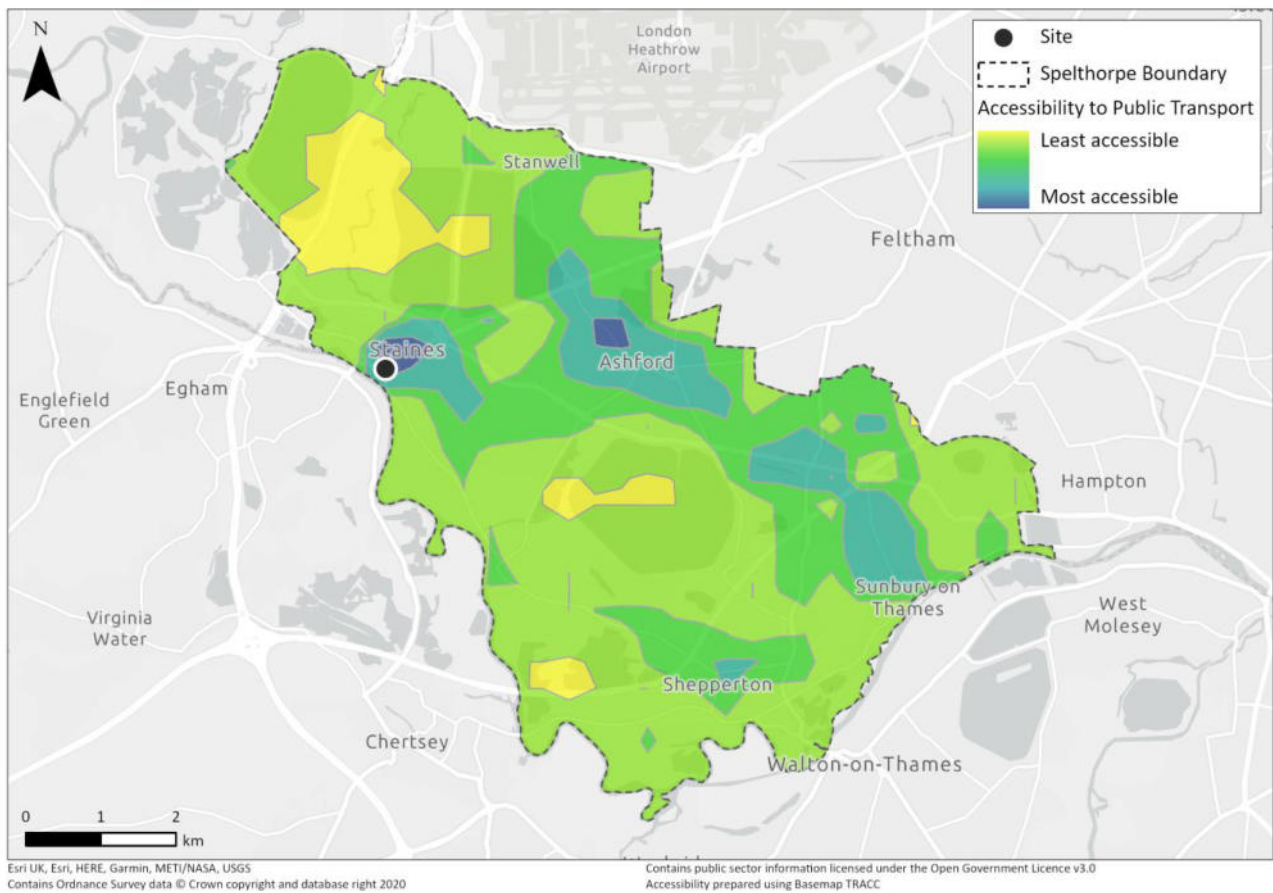


<sup>4</sup> Workplace population taken from Census 2011 Data Set WP101EW for all output areas within Spelthorne as indicator of employment concentrations.



4.2.6 Figure 4-4 shows the relative accessibility to public transport across Spelthorne Borough using service and frequency information taken from the TRACC software package. This clearly highlights that central Staines is one of the most accessible areas in the Borough for journeys by public transport.

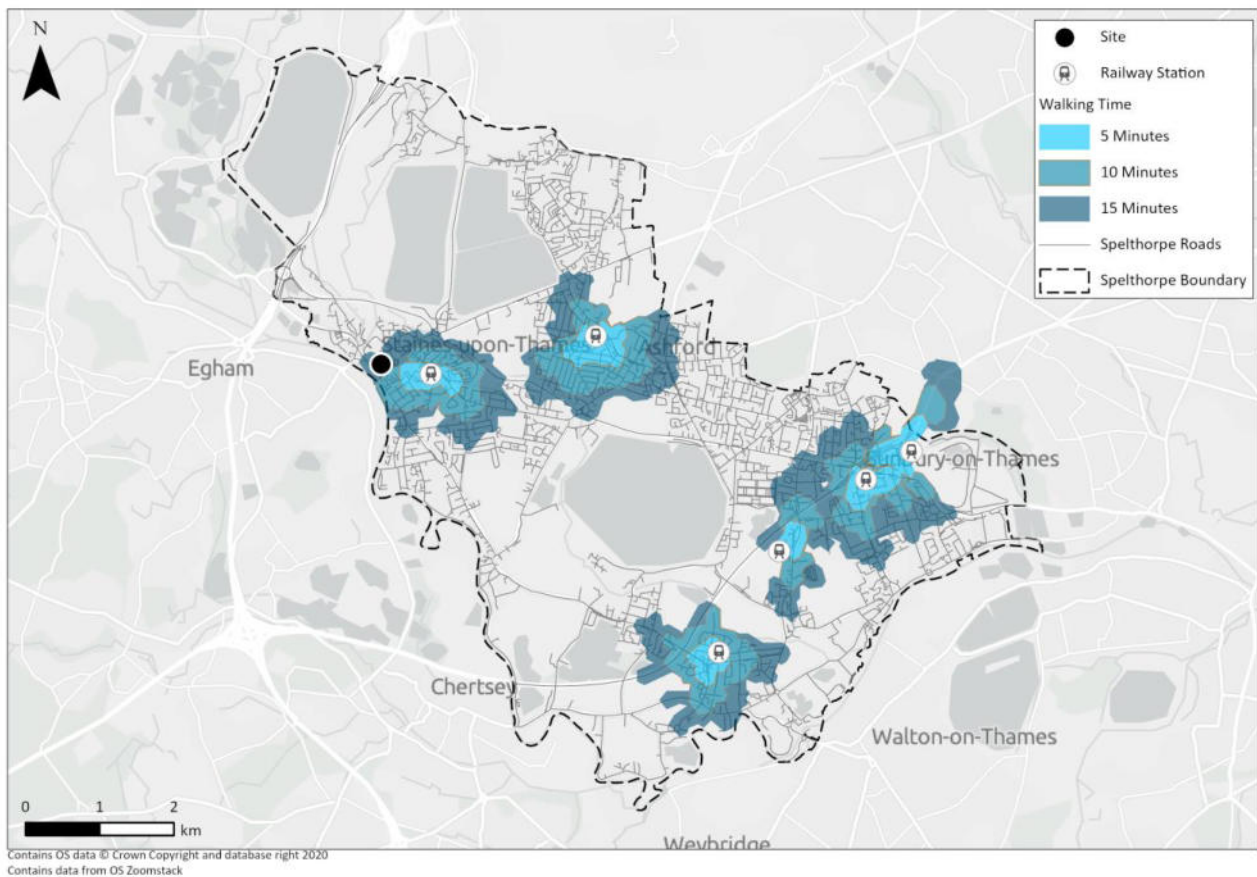
**Figure 4-4: Site Location in relation to public transport accessibility**





4.2.7 Figure 4-5 shows the areas of Spelthorne that are located within walking distance of a mainline railway station. The proposed development is within an 11-minute walk distance of Staines Railway Station which is a significantly higher level of accessibility to rail services than the majority of Spelthorne Borough.

**Figure 4-5: Walking catchments around mainline railway stations within Spelthorne.**

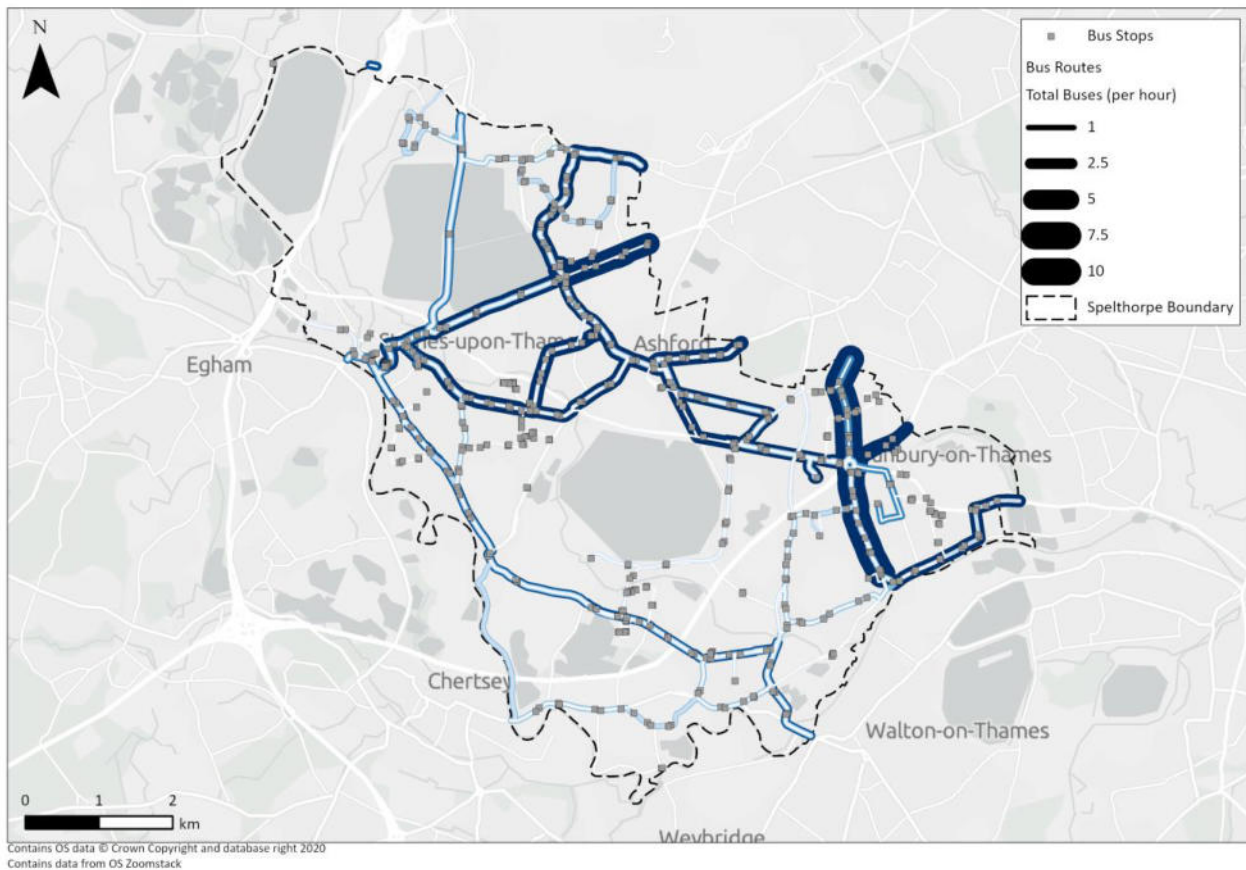






4.2.8 Figure 4-6 shows the location of and frequency of key bus corridors in Spelthorne. The location of the proposed development within 300 metres of Staines Bus Station will provide future residents of the scheme with access to frequent bus services to the north, east, and south of the borough as well as into neighbouring local authority areas. The range and frequency of services offered from Staines Bus Station result in a significantly higher level of accessibility by bus than the majority of the rest of the district.

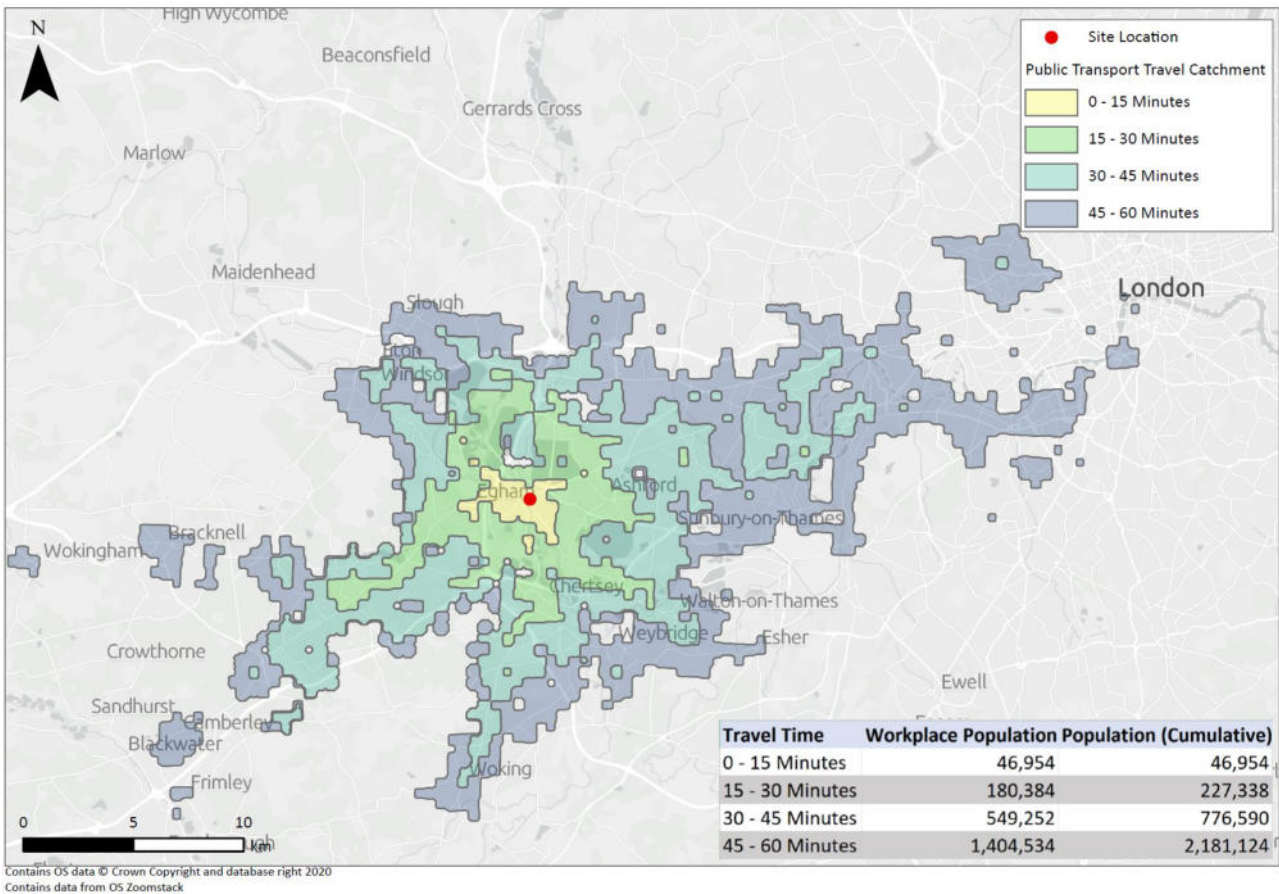
**Figure 4-6: Bus corridors and associated frequencies within Spelthorne.**





4.2.9 Figure 4-7 demonstrates the cumulative public transport accessibility of the site by showing the area that can be reached utilising these modes within a one-hour travel time from the site. This illustrates a ‘door-to-door’ journey time including walking times to public transport stops and stations and dwell times waiting for services. There are over two million jobs located within a one-hour travel time by public transport of the proposed development.

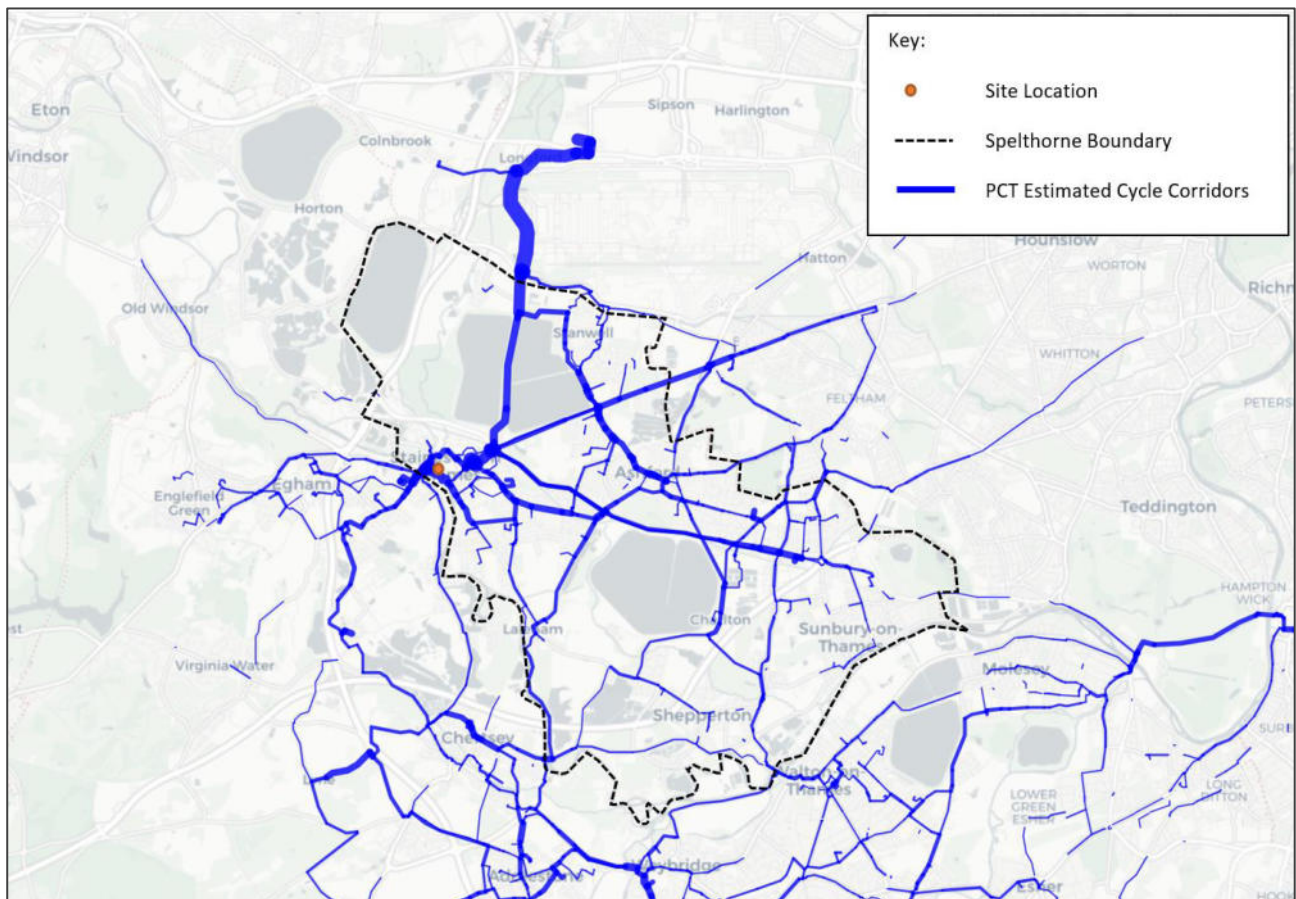
**Figure 4-7: Public Transport Catchment from the Proposed Development**





- 4.2.10 DfT's Propensity to Cycle Tool (PCT) was created to assist in the prioritisation of cycle investment and interventions, at both a strategic level and local level. The PCT is a powerful tool for understanding demand and potential for cycling in different areas, and to identify potential route alignments. The tool identifies cycle flows between home address and place of employment and estimates potential change over time accounting for policy and technology interventions.
- 4.2.11 Figure 4-8 shows the site location in relation to routes in Spelthorne where the highest demand for cycle journeys is likely to occur utilising the 'e-bike' scenario within the PCT tool. This clearly indicates that a residential development in the centre of Staines would be well located for journeys to be undertaken by cycle, being in close proximity to a number of high demand cycle corridors around Staines itself and north towards Heathrow.

**Figure 4-8: Site location in relation to PCT Cycle Corridors**



- 4.2.12 It is clear from the figures presented above that the proposed development is in a highly accessible location and this was expressly agreed by SCC during scoping correspondence, a copy of which is included within Appendix A of the submitted TA [CD 1.4]. Within that scoping correspondence SCC stated:



*“The site does have good links to public transport and a good range of local amenities within walk or cycle distance, and the site therefore does meet the criteria against which a reduction in parking may be acceptable.”*

4.2.13 The SCC response to the application [CD 8.1] confirms the views of the local highway authority that the site is in a highly accessible location where low parking ratios are appropriate.

4.2.14 SBC commissioned an independent review of the transport information submitted with the application from the Peter Davidson Consultancy Ltd. [CD 8.2]. In relation to the location of the site and the potential for a reduction in car parking, the independent review concluded that:

*“The applicant has adequately demonstrated that due to the site location and sustainable travel options the criteria for some reduction in car parking provision, compared to SBC’s minimum Parking standards, have been met.”*

4.2.15 Both the local highway authority and the independent consultancy appointed by SBC thus agree that a reduced level of parking is appropriate on this site.

### **4.3 Benefit of Low Parking Provision**

4.3.1 The proposed development is situated in a highly accessible location with excellent public transport services and local amenities. Providing less car parking will result in fewer car-owning households occupying dwellings on the site, thereby resulting in lower car use in the congested Staines town centre and deriving the maximum benefit afforded by the development’s location - the alternative being that such households would be accommodated in less sustainable locations where car ownership may be more important. This was accepted by SCC who, in their response to the application, [CD 8.1] stated that:

*“It is also worth considering that a lower car ownership rate is likely to also reduce the number of trips undertaken to and from the site by private vehicles, which reduces the impact the development has on the local network”*

4.3.2 Paragraph 105 of the NPPF states that: *“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.”*

4.3.3 In line with the position of SCC and the policies contained in the NPPF, a predominantly car-free development on this site is appropriate and would bring forward much needed residential development whilst minimising any increase in congestion and the other environmental disbenefits associated with car traffic generation, including increased carbon emissions.





- 4.3.4 It is relevant to note that SBC has declared a climate emergency, stating that *“there now needs to be a greater step change to reduce carbon emissions and reduce the damage to the environment for our residents and future generations”*<sup>5</sup>. In addition, SBC have also stated that *“Across the Council’s services, all strategic decisions, budgets and approaches to planning decisions will be aligned with the goal of achieving a shift to carbon neutrality”*. Alongside this, the SCC Climate Change Strategy sets a target for a 60% reduction in transport emissions by 2035 compared to business as usual, with a further target for net zero carbon by 2050.<sup>6</sup> It is perhaps regrettable that at the same time the Council has sought to argue that a greater level of car parking should be provided on-site than the developer considers necessary.
- 4.3.5 Requiring unnecessary car parking in this highly-accessible location, which would encourage increased car use, runs counter to SBC’s climate emergency declaration and conflicts with national policy. Paragraph 8(c) of the NPPF requires sustainable development that makes efficient use of land, minimises pollution, mitigates and adapts to climate change and supports a low carbon economy. The provision of a predominantly car-free development within Staines town centre is entirely in line with the need for an acceleration of the existing patterns of living in town centre locations where car travel is not necessary for most people.

#### 4.4 Low Parking Provision and Car Ownership

- 4.4.1 Whilst the independent review of the transport submission on behalf of SBC concluded that a reduction in car parking provision, compared to SBC’s minimum parking standards, would be acceptable at the development site, it has not been accepted by SBC that the reduced parking provision will actually result in reduced car ownership.
- 4.4.2 There is a substantial body of information which shows that the availability of parking within a scheme in a location where off-site car parking is limited is a key driver of car ownership. The Transport for London (TfL) document *“Residential Car Parking”* (2017), which formed part of the London Plan evidence base, states that *“Developments with more car parking have residents who are more likely to own cars; this is consistent across a number of other factors”*. The document further found that *“reducing the maximum provision of parking could encourage those who could consider a car-free lifestyle to adopt one”*.
- 4.4.3 Within their response to the application [CD 8.1], SCC as highways authority, concluded that it is *“unlikely that a prospective resident who intended to own a vehicle would move into the development where the only opportunity to park was some 300 metre walk from the site, and where they were not guaranteed to find a space.”*

<sup>5</sup> <https://www.spelthorne.gov.uk/article/20185/Spelthorne-declares-climate-emergency>

<sup>6</sup> [https://www.surreycc.gov.uk/\\_\\_data/assets/pdf\\_file/0003/225615/Surreys-Climate-Change-Strategy-2020.pdf](https://www.surreycc.gov.uk/__data/assets/pdf_file/0003/225615/Surreys-Climate-Change-Strategy-2020.pdf)



- 4.4.4 The link between car parking provision and car ownership has been accepted by Planning Inspectors on previous appeals including:
- APP/R5510/W/20/3250434 – 43-67 High Street, Yiewsley
  - APP/C3620/W/17/3187875 – 80a, 86 and 88 Woodfield Lane, Ashted
  - APP/E0345/A/12/2178852 – The Old Bakehouse, Caversham
  - APP/L5240/V/17/3174139 – 1-9 Banstead Road, Purley
  - APP/R5510/W/19/3230503 – 9 Nestles Avenue, Hayes
- 4.4.5 A full review of these appeal decisions was provided within note *Response to Parking Comments April 2021* [CD 1.31]. In each of the above cases the Inspector concluded that, given the limited opportunities for parking offered by the developments (both on-site and in the surrounding areas), they were likely to attract occupiers that did not own a car.
- 4.4.6 The future residents of the scheme will be self-determined, choosing to either rent/buy within the scheme and are therefore only likely to move to the scheme if it matches their lifestyle and needs, particularly in relation to parking. As has been demonstrated there is a clear existing market for car free housing within Staines, with over 300 car free dwellings having been approved, and so there will be no shortage of potential occupiers.
- 4.4.7 Furthermore the affordable units will be allocated by the Local Authority and therefore parking needs can be considered as part of the allocation process enabling a level of control on parking demand for this element to be retained by SBC.

#### **PJA Parking Questionnaire Survey**

- 4.4.8 In order to provide further evidence of car ownership and parking habits among those living in low-car (less than one car parking space per dwelling) flatted developments in Southeast England, a parking survey was prepared and distributed by PJA to residents of eight sites:
- Part of Phase 1A and Phase 1B of Charter Square, Staines: 254 flats with 177 car parking spaces (200 completed flats identified)
  - Keshava House, Staines: 17 flats with no on-site car parking
  - Phase 1 and Phase 2 of Chatham Street, Reading: 491 flats with 285 car parking spaces
  - Former Cooper BMW, Reading: 315 flats with 49 car parking spaces (263 completed flats identified)
  - Enid Wood House, Bracknell: 97 flats with 20 car parking spaces
  - Former Hayes and Harlington Station Goods Yard: 566 flats with 425 car parking spaces (575 completed flats identified)



- Land at Guildford Road and Bradfield Close, Woking: 483 flats with 265 car parking spaces (472 completed units identified)
- Berkshire House, Maidenhead: 68 flats with 28 car parking spaces

4.4.9 The survey sought data on the number of cars owned by the household, on-site car parking availability, and usual parking location. To encourage responses, a prize draw to win one of three £50 'Love to Shop' gift cards was included for responses received within the deadline. The survey template is included as **Appendix B**.

4.4.10 At the time of writing a limited response of 34 questionnaires have been received. Whilst not a statistically significant response rate, this is still considered to provide a useful insight into car ownership patterns at comparable developments. The surveys demonstrate that considerably lower car ownership levels among those without access to an on-site car parking space than for those with a space. Overall, 50% of survey respondents reported that they do not own a car, with 47% stating that they own one car and 3% stating that they own two cars.

4.4.11 Furthermore:

- Of those with on-site car parking: 20% do not own a car, 75% own one car and 5% own two cars.
- Of those without on-site car parking: 93% do not own a car, 7% own one car and none own two cars.

4.4.12 This confirms the strong link between car parking provision and car ownership. The detailed responses to the survey also revealed that even where residents own more cars than could be accommodated by the number of on-site spaces available to them, they did not park these on-street, choosing instead to use other private or public car parking spaces.

## 4.5 Alternatives to Private Car Ownership

4.5.1 To further support car free living at the development a number of measures have been proposed which are summarised below and would be secured through the S106 agreement:

### Car Club

4.5.2 Car Clubs are a highly effective measure in reducing car ownership. The CoMoUK England and Wales Car Club Annual Survey 2020<sup>7</sup> [CD 8.4] demonstrates that in England and Wales, nine private cars are taken off the road by each Car Club vehicle. Some 25% of Car Club members had sold a car since joining a Car Club, and 22% would have bought a car if they had not joined the Car Club. The provision of access to a Car Club vehicle provides easy access to a car for occasional journeys that

---

<sup>7</sup> <https://como.org.uk/wp-content/uploads/2021/06/CoMoUK-England-and-Wales-Car-Club-Summary-Report-2020.pdf>



cannot easily be made by other means and increase the number of people who can feasibly enjoy a largely car-free lifestyle.

4.5.3 As a result, Car Club members are considerably more likely to travel by sustainable modes. The CoMoUK Survey found that across England only 11% of people travel by bicycle more than once a week, whilst 30% of Car Club members use a bicycle at least three times a week. While generally only 8% travel by train at least once a week, 22% of Car Club members do so.<sup>8</sup>

4.5.4 Two Car Club spaces would be provided on Elmsleigh Road as part of the development, and residents at the site will be provided with one-year's free membership and 25 miles free Car Club travel with the Enterprise Car Club. Vehicles parked in the Car Club spaces would be available for use by any member of the Club whether resident at the scheme or not. This would increase its accessibility to local residents, therefore enabling a wider reduction in car ownership and use.

4.5.5 Enterprise Car Club provided a letter to express their interest in providing a Car Club service and vehicle(s) at Elmsleigh Road Staines in September 2020. A copy of this is included within **Appendix C**. This included for the provision of:

- Car Club Vehicle(s)
- Free Car Club membership for residents.
- Access for residents to all car club vehicles in the UK.
- Discount for active car club members with Enterprise Rent-A-Car.
- The car club vehicles would also serve the surrounding community in Spelthorne

4.5.6 Within Staines, there is an existing car club vehicle operated by Enterprise that is based at the Charter Square development to the north of the Town Centre. Further car club vehicles will be provided by the committed developments at Charter Square (Phase 1b), Eden Grove, Renshaw Industrial Estate and Bridge Street developments. However, these will all be located to the north or west of the town centre. The provision of two car club vehicles as part of the proposed development will therefore offer a benefit to existing residents to the south of the town centre, as they would be located significantly closer than the other existing or committed vehicles.

### **Travel Plan**

4.5.7 A Travel Plan was prepared as part of the planning application [CD 1.13] and would be implemented at the development. As noted above, this will be updated to include details of the Parking Management Strategy.

---

<sup>8</sup> Public transport comparisons in the Comouk report are taken from 2018 given the impact of Covid-19 on public transport use

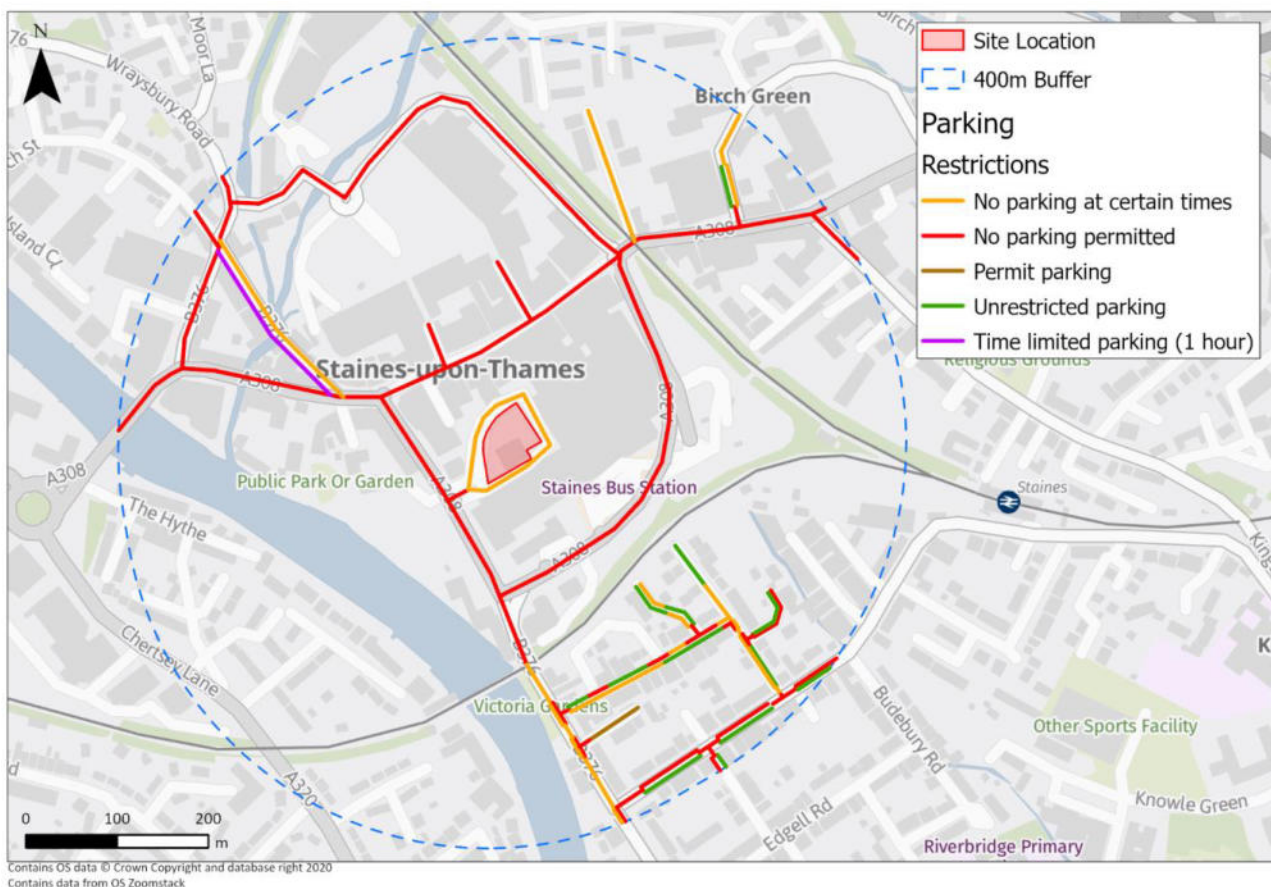


- 4.5.8 As part of the Travel Plan the developer has committed to offering membership of the Easit Sustainable Travel Scheme to residents for an initial one-year period. This would provide the following benefits to residents (subject to change at Easit's discretion): 15% Discount on Rail fares with Southwestern Trains; discounts at Halfords; discounts with Enterprise Car Club (as noted above); taster tickets for bus routes; discounts on electric bikes; discounts on eMopeds; and access to the Easit journey share site. A formal Easit proposal, including details of the benefits, is included as **Appendix D**.

## 4.6 Existing Parking Restrictions and Parking Survey Results

- 4.6.1 Section 5 of the TA [CD 1.4] provides a detailed review of the parking restrictions within a 400m distance surrounding the site. These are indicated on Figure 4-7 below and show that no parking is permitted in the vicinity of the site and with only limited opportunities for parking further away. It should also be noted that much of the 'unrestricted' parking on the roads to the south east of the development is in fact restricted by the presence of private driveways, which limit parking solely to the owner of the property.

**Figure 4-9: Parking Restrictions**





- 4.6.2 Subsequent to this, parking surveys were undertaken over an area of approximately 1.1 kilometres walking distance northeast of the site and up to approximately 900 metres walking distance south of the site which also identified the parking restrictions over this wider area. The full parking survey results are included within Appendix A of CD 1.29.
- 4.6.3 A total of 958 parking spaces were identified across the survey area, of which 426 spaces are subject to parking restrictions (typically single yellow lines) which would prevent use by future residents during the daytime but would be available during evening periods. Of these spaces, only 29 (7%) were occupied on the 2<sup>nd</sup> March 2021 and 30 (7%) were occupied on the 3<sup>rd</sup> March 2021 and so there are approximately 400 spaces available to future residents of the site outside of the daily restriction periods, should they choose to use them.
- 4.6.4 However, whilst the timings of the restrictions vary, all these spaces would require a future resident to move their car early in the morning with the majority of locations then prohibiting parking until 18:30. This is very unlikely to be an attractive proposition to many residents at the proposed development looking to park off-site on a regular basis and is therefore unlikely to encourage car ownership.
- 4.6.5 Of the remaining 522 unrestricted parking spaces across the wider area, 352 (67%) were occupied overnight (00:30-05:30) on the 2<sup>nd</sup> March 2021 and 342 (66%) were occupied overnight on the 3<sup>rd</sup> March 2021. The results of the parking survey therefore demonstrate that 140-160 unrestricted on-street parking bays were available overnight across the wider area.
- 4.6.6 However, Table 4-3 below shows that in general, the roads that are closest to the site experience higher levels of parking stress compared to those which are further away. This too would act as a disincentive to future residents parking in this area, a point that was also made by SCC as highway authority in their response to the application.

**Table 4-3: Unrestricted Car Parking Summary**

Road	Unrestricted parking spaces	Approx. walk time (to centre of link)	Demand		Occupation %	
			2 <sup>nd</sup> March 2021	3 <sup>rd</sup> March 2021	2 <sup>nd</sup> March 2021	3 <sup>rd</sup> March 2021
Prospect Place	8	5	9	9	113%	113%
Eton Court	11	7	8	7	73%	64%
Gresham Road	15	7	15	14	100%	93%
Richmond Road	35	7	33	35	94%	100%
B376 Laleham Rd	16	8	3	3	19%	19%
Beehive Road	14	8	14	15	100%	107%
George Street	2	8	0	0	0%	0%
Edgell Road	57	9	53	48	93%	84%
Kingston Road	19	10	11	10	58%	53%
Langley Road	20	10	26	27	130%	135%





Road	Unrestricted parking spaces	Approx. walk time (to centre of link)	Demand		Occupation %	
			2 <sup>nd</sup> March 2021	3 <sup>rd</sup> March 2021	2 <sup>nd</sup> March 2021	3 <sup>rd</sup> March 2021
New Street	8	10	4	4	50%	50%
Budeburry Road	24	11	21	20	88%	83%
Sidney Road	47	11	40	37	85%	79%
Wyatt Road	30	11	28	26	93%	87%
Broadacre	19	12	16	14	84%	74%
Murdoch Close	16	12	8	7	50%	44%
Cotswold Close	7	13	1	1	14%	14%
Rosefield Road	47	13	35	31	74%	66%
Greenlands Rd	98	14	19	24	19%	24%
<b>Total</b>	<b>493</b>		<b>344</b>	<b>332</b>	<b>67%</b>	<b>66%</b>

4.6.7 For those roads with unrestricted car parking closest to the site where existing parking stress is highest, the availability of off-street car parking for existing houses has also been reviewed. This was informed by a desk-based study, with parking spaces, car ports, driveways and garages included. Flats along these roads largely benefit from shared parking, and were excluded from the figures. The results of this analysis are presented in Table 4-4.

**Table 4-4: Car Parking Availability for Existing Houses**

Road	No. houses	0 spaces	1 space	2 space	3 space	4 space	5 space	Average
Beehive Road	12	5	3	4	0	0	0	0.92
Budeburry Road <sup>9</sup>	14	1	7	1	2	2	1	2.00
Edgell Road	65	41	18	5	0	1	0	0.49
Eton Court	18	0	18	0	0	0	0	1.00
Gresham Road	48	7	14	16	8	3	0	1.71
Prospect Place	10	8	0	2	0	0	0	0.40
Richmond Road	61	17	13	23	7	1	0	1.38
<b>Total</b>	<b>228</b>	<b>79</b>	<b>73</b>	<b>51</b>	<b>17</b>	<b>7</b>	<b>1</b>	<b>1.14</b>

4.6.8 Along these roads, over 65% of houses have access to at least one off-street car parking space, with an average of 1.14 spaces per house. Even if a small amount off-site parking from the development was to occur in these locations, the amenity impact for the majority of households would be limited as they would still have off-street parking available to them.

4.6.9 From the evidence presented above, it is apparent that the nearest on-street spaces, which are still a significant distance from the site, provide limited opportunities for off-site parking, which would act as an obvious and effective deterrent to residents owning a car without access to an on-site

<sup>9</sup> between Gresham Road and Edgell Road



parking space. There is a greater amount of unrestricted on-street parking capacity available further from the site, within a 15 minute walk. However, again it is very unlikely this will be an attractive proposition.

- 4.6.10 Furthermore, the developer has offered to provide a financial contribution to review parking restrictions within the Gresham Road area and potentially fund the introduction of a residents parking zone to ensure that the area is not impacted by any potential overspill from the proposed development. This is very much a safety net, and on the basis of the evidence presently available there is no warrant for such a measure.
- 4.6.11 This approach to parking management is in full accordance with the Surrey Parking Strategy 2020 [CD 5.9] which specifically highlights the introduction of parking controls where necessary to make best use of the space available as part of the council's preferred strategy to managing constraints. The funding of such an intervention would likely result in an improvement in the existing situation and therefore bring about an improvement in residential amenity rather than an adverse impact. As noted in the draft SoCGSCC, the local highway authority's position is that such a management solution is not required in this case given that parking impacts from the scheme are not anticipated, a position with which I strongly concur. It is also implicitly supported by the officers who reported the matter to committee.





## 5 Summary and Conclusions

### 5.1 Summary

5.1.1 This proof of evidence has been prepared to demonstrate that the parking provision proposed as part of the development at the Former Masonic Hall and Telephone Exchange Site at Elmsleigh Road, Staines, is appropriate and would not result in unacceptable parking stress and associated detrimental impact on residential amenity.

5.1.2 This proof has:

- examined relevant transport and parking policy, demonstrating that the proposals are in accordance with both national and local development policies;
- summarised the proposed parking provision and management strategy which includes the promotion of the site as a car free scheme;
- established that car free living is an existing and growing lifestyle choice in Staines town centre and that over 300 car free dwellings have already been granted planning consent;
- Demonstrated that the highly sustainable location of the site is suitable for a car free development;
- Highlighted the benefits of low car and car free developments and how they can support wider policy objectives related to traffic congestion and climate change;
- Set out alternatives to private car ownership that will be promoted by the development to support car free living;
- Reviewed existing parking patterns and restrictions to demonstrate that the nearest on-street spaces, which are still a significant distance from the site, provide limited opportunities for off-site parking. There is a greater amount of unrestricted on-street parking capacity available further from the site, within a 15 minute walk. However, again it is very unlikely this will be an attractive proposition.
- It is therefore highly likely that future residents without access to a car parking space will not choose to own a car and therefore any impact on the amenity of existing residents would be very unlikely.

### 5.2 Conclusions

5.2.1 The proposed development, which received no objections from the local highway authority and was recommended for approval by the planning authority, is located in a highly accessible location where there is existing and growing demand for car free dwellings. There are genuine alternatives to private car ownership which the development will add to; and controls on on-street parking that can be strengthened if required.



- 5.2.2 It is therefore my view that the proposed parking provision is appropriate and will not result in any unacceptable impacts on the amenity of residents within Staines. There are therefore no highways or transport grounds on which to withhold planning permission.



## KS404EW - Car or van availability

ONS Crown Copyright Reserved [from Nomis on 2 November 2021]

population	All households; All cars or vans
units	Households
area type	local authorities: district / unitary (prior to April 2015)
area name	Spelthorne
rural urban	Total

Cars	2011
All categories: Car or van availability	39,512
No cars or vans in household	5,861
1 car or van in household	16,942
2 cars or vans in household	12,499
3 cars or vans in household	3,017
4 or more cars or vans in household	1,193

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.

# KS404EW - Car or van availability

ONS Crown Copyright Reserved [from Nomis on 23 September 2021]

population All households; All cars or vans  
units Households  
date 2011  
rural urban Total

2011 output area	All categories: Car or van availability	No cars or vans in household	1 car or van in household	2 cars or vans in household	3 cars or vans in household	4 or more cars or vans in household
E00156681	127	14	75	32	5	1
E00156682	142	20	56	44	15	7
E00156683	122	10	52	49	6	5
E00156685	114	11	47	42	11	3
E00156687	118	15	58	31	8	6
E00156689	108	7	39	44	9	9
E00156699	119	22	63	26	7	1
E00156700	104	26	55	23	0	0
E00156725	147	37	60	40	8	2
E00156726	140	11	61	44	11	13
E00156727	124	14	69	31	6	4
E00156728	121	42	57	17	0	5
E00156729	119	24	63	25	6	1
E00156730	120	14	58	36	5	7
E00156731	91	51	33	7	0	0
E00156732	132	42	56	28	4	2
E00156733	100	14	48	27	6	5
E00156734	92	14	45	24	8	1
E00156735	123	24	58	35	5	1
E00156736	97	10	52	25	8	2
E00156737	118	12	37	43	24	2
E00156738	196	68	99	25	3	1
E00156739	129	39	75	13	2	0
E00156740	140	12	77	44	4	3
E00156741	177	27	87	52	10	1
E00156742	155	19	69	57	7	3
E00156743	111	19	57	27	7	1
E00156744	119	19	67	31	2	0
E00156745	130	19	45	49	12	5
E00156746	116	47	54	14	1	0
E00156747	126	9	42	54	14	7
E00156748	145	32	77	30	4	2
E00156749	112	34	64	14	0	0
E00156750	142	45	69	19	8	1
E00156751	99	31	52	12	2	2
E00156752	107	38	49	18	0	2
E00156756	138	14	57	50	11	6
E00156757	127	21	53	40	9	4
E00156759	129	14	61	44	8	2
E00156761	172	65	71	27	8	1
E00156764	114	14	42	46	6	6
E00156770	150	30	64	41	11	4
E00156771	116	7	53	46	7	3
E00156772	130	19	40	55	11	5
E00083689	133	2	37	68	19	7
E00156378	99	32	43	15	7	2
E00156379	127	34	48	35	8	2
E00156380	113	21	55	32	4	1
E00156381	115	11	55	36	9	4
E00156382	126	20	41	55	7	3
E00156383	141	22	71	35	9	4
E00156384	125	14	52	48	10	1
E00156386	109	18	59	24	8	0
E00156387	109	11	57	33	6	2
E00156388	119	52	43	22	2	0
E00156389	125	55	41	25	3	1
E00156390	165	19	86	42	12	6
E00156392	151	43	77	22	8	1
E00156393	116	20	51	33	11	1
E00156394	141	26	54	44	10	7
E00156395	110	14	52	37	6	1
E00156396	132	33	51	42	6	0
E00156397	124	19	60	34	9	2
E00156399	117	13	42	49	10	3
E00156487	123	7	33	56	19	8
E00156488	106	14	56	31	4	1

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.



## **Appendix B      Residential Parking Questionnaire Template**



# Residential Parking Research - (Development Name)

PJA are one of the leading Transport Planning consultancies in the UK and are undertaking a piece of research to gain insight into the current car ownership trends and levels of parking provision required for town centre residential developments.

As a resident of a town centre development in ..... we would be grateful if you could complete this short survey on behalf of your household. It should take you less than two minutes.

As a reward, please provide your contact details at the end of the survey to be entered into a prize draw for one of three £50 'Love to Shop' Giftcards.

Visit our website ([www.pja.co.uk](http://www.pja.co.uk) (<http://www.pja.co.uk>)) to find out more about PJA, and if you have any queries relating to this research please email [parkingresearch@pja.co.uk](mailto:parkingresearch@pja.co.uk) (<mailto:parkingresearch@pja.co.uk>).

*In line with General Data Protection Regulation (GDPR), any details provided by yourself will be stored on Phil Jones Associates' (PJA) secure systems. Contact details will only be used for the purposes of administering the prize draw and will not form part of the research; these will be deleted once the prizes have been distributed. For more information on our Privacy Policy please visit <https://pja.co.uk/privacy-terms-policy/> (<https://pja.co.uk/privacy-terms-policy/>).*

\* Required

1. In total, how many cars or vans are owned, or available for use, by members of this household? \*

☐ 0

☐ 1

☐ 2

☐ 3+

2. Do you have access to any parking spaces within your development? \*

☐ Yes

☐ No

3. How many parking spaces are exclusively for your household? \*

☐ 1

☐ 2

☐ 3

☐ Parking is shared

4. Is the exclusive parking sufficient for all vehicles within your household?

☐ Yes

☐ No

5. Where do you usually park additional vehicles when at home?

☐ On-street - Residents Permit Zone

☐ On-street - Unrestricted Zone

☐ Public Car Park

☐ Private Car Park

☐

Other



6. Where do you usually park your car? \*

☐ On-street - Residents Permit Zone

☐ On-street - Unrestricted Zone

☐ Public Car Park

☐ Private Car Park

☐

Other

7. Do you have access to a parking space within your development that you do not regularly use? \*

☐ Yes

☐ No

8. How many parking spaces are exclusively for your household? \*

☐ 1

☐ 2

☐ 3+

☐ Parking is shared

9. Which age bracket do you fall into? \*

- ☐ 18-29
- ☐ 30-39
- ☐ 40-49
- ☐ 50-59
- ☐ 60-69
- ☐ 70+
- ☐ Prefer not to say

10. Thank you for taking part in this survey.

To be in with a chance of winning one of three £50 'Love to Shop' Giftcards please provide your email address below.

The draw will be undertaken on 1st November and winners will be contacted by email. Contact details will only be used for the purposes of administering the prize draw and will not form part of the research.

---

This content is neither created nor endorsed by Microsoft. The data you submit will be sent to the form owner.

 Microsoft Forms





15<sup>th</sup> September 2020

**To Whom it May Concern at Spelthorne Council**

Dear Sir or Madam

**Car Club provision at Elmsleigh Road, Staines. Proposed Redevelopment of site to locate 206 housing units**

Enterprise Car Club are in discussions with PJA and would like to express interest in providing a car club service and vehicle(s) at the above address.

These discussions include providing

- Car Club Vehicle(s)
- Free Car Club membership for residents.
- Access for residents to [all car club vehicles in the UK.](#)
- Discount for active car club members with Enterprise Rent-A-Car.
- The car club vehicles would also serve the surrounding community in Spelthorne

The above car club service and package will be introduced to new residents, employees and users as early to reduce the need to own a vehicle.

Yours faithfully

Tony Barnard  
Head of Car Club South East Region – Enterprise Car Club



## **Appendix D      Easit Travel Discount Confirmation**

Ref. MM/ms

Attn. Matthew Franklin  
Phil Jones Associates Ltd  
The Aquarium  
King Street  
Reading  
RG1 2AN

25<sup>th</sup> October 2021

**Elmsleigh Road, Staines**

Dear Matthew,

Further to our various conversations, I can confirm that The easitNETWORK would be happy to apply our methodology in a residential context for the above development.

The initiatives currently available through our easit are subject to change but currently include....

**Discounts at Halfords**

On all bicycles and accessories when purchased in store.

**Discounts with Enterprise Car Club**

Which includes free miles to new users.

**Discounts with Co-Wheels Car Club**

Which includes free miles to new users.

**Discounts on charge points**

In addition to the government grants currently available, a further 10-20% discount has been negotiated, dependant on the type of charger being installed.

**Taster tickets for certain bus routes (may require some further negotiation to cover the area)**

**Discounts on electric bikes**

Is available with Halfords and various independent providers across the easitAREAS.

**Discounts on eMopeds**

Up to 25% discount available from the largest eMoped retailer in the country.

**Access to our journey share site.**

The largest journey share site outside of the United States. Used to pair people who wish to travel by car, train, bus, bicycle, or indeed walk or run.

We have the capacity to start providing the above as soon as necessary.

Yours sincerely

Dr. Mel Mehmet MBE  
Chief Executive Officer