

**Town and Country Planning Act 1990**

**Town and Country Planning (Inquiry Procedure) Rules (England) 2000**

**Appeal by Inland Homes Limited Against the Decision of Spelthorne Borough Council, as Local Planning Authority, to Refuse to Grant Planning Permission in Respect of:**

**Redevelopment of the Site to Provide 206 Dwellings**

**at:**

**The Old Telephone Exchange and Masonic Hall, Elmsleigh Road,  
Staines on Thames, TW18 4PN**

**PROOF OF EVIDENCE OF PHILLIP E HUGHES MRTPI  
ON BEHALF OF SPELTHORNE BOROUGH COUNCIL**

**October 2021**

**PLANNING INSPECTORATE REF: APP/Z3635/W/21/3280090**

**LOCAL PLANNING AUTHORITY REF. 20/01199/FUL**

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## **Appendices**

- 1            Location Plan Including Building Names
- 2            Location Plan including Building Heights
- 3            Extract Table CT01103 2011 Census Data ONS
- 4            Afternoon/ Evening Car Parking Beat Survey

**Phillip Eric Hughes will say:**

I am a director of PHD Chartered Town Planners Limited, a town planning consultancy that I established in 1995. I had also worked at a senior level in local government for 10 years in both Planning Policy and Development Control.

I have a Bachelor of Arts Honours Degree (BA [Hons]) in Town and Country Planning and I have been a corporate member of the Royal Town Planning Institute (MRTPI) since 1990, I am also a Fellow of the Royal Geographical Society (FRGS). I also have a Diploma in Management Science (Dip Man) and I am a Member of the Institute of Management (MCMI). I am also a member of the Town and Country Planning Association and an affiliate member of the RIBA.

I have represented a wide variety of clients at appeals ranging from Local Planning Authorities (including LB Camden, RB Kingston, Spelthorne, Hertsmere, Watford and Walsall Boroughs and Central Bedfordshire, Epping Forest and Bassetlaw Districts), Parish Councils (including Bovingdon and Tetsworth), to housebuilders (New Homes Estates Limited, MASMA Limited, Whittleworth Homes, MS Oaklands Limited, Fusion Residential, Henry Homes plc etc.), developers (Lanz Group, Mitre Property Management Limited, Mark Stephen Limited etc.), property companies (Acre (London) Ltd, Orb Estates, Property Matters LLP, Property Matters LLC, Albermarle Property Investments plc), businesses (Super Toughened Glass Limited, Williams Tenders Limited, JIRWL, Hollywell Spring Limited), amenity groups (Anglefield Residents Association, Stopit Action Group, Paynes Lane Association, Hemley Hill Action Group, Birch Green Residents Group, Bury Gate Residents Association) and individual householders.

I have visited the appeal site and general locality on a number of occasions and I am familiar with the policies applicable to the site. I am familiar with the local, national and regional planning policies relevant to this appeal.

The evidence that I have prepared and provide for this appeal has been prepared and is given in accordance with the guidance of the Royal Town Planning Institute and I confirm that the opinions expressed are my true and professional opinions.

## 1 Introduction

- 1.1 The application the subject of this appeal was submitted on 30 September 2020. The application proposed:

*“Demolition of the Former Masonic Hall and redevelopment of site to provide 206 dwellings together with car and cycle parking, hard and soft landscaping and other associated works.”*

- 1.2 The Council determined the application the subject of this appeal on 24 June 2021. It resolved to refuse planning permission for reasons as set out on the decision notice and detailed below:

*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.*

- 1.3 A copy of the committee report is attached at CD3.1 and I note that the application the subject of this appeal was recommended to be granted planning permission subject to the applicant first agreeing a section 106 obligation. Contrary to this recommendation Members resolved to refuse to grant planning permission.

- 1.4 Attached at CD3.2 is a copy of the decision notice.

- 1.5 I accept that the Council is unable to demonstrate a five year supply of deliverable housing land. As such, the proposals should be determined having regard to paragraph 11(d)(ii) of the NPPF 2021 which is otherwise known as the *tilted balance*.

- 1.6 Where I include photography within this proof that is extracted from existing documents I refer to the document (i.e. TVA = Townscape Visual Assessment), in brackets.

- 1.7 I include extracts of some of the viewpoints because the size of the imagery within this document is limited and the extract relates to the relevant part of the image. I would direct the Inspector to the original imagery should there be any query over the impact from the viewpoint
- 1.8 Where I have used my own photographs I include my initials (PH) in the title.
- 1.9 My photography is intended to illustrate points or direct the Inspector to views of the site and is not intended to represent professionally taken images taken within recognised focal parameters etc..

## 2 Site and Surroundings

- 2.1 The appeal site comprises the site of the former Masonic Hall which I understand was vacated in 2020. The rest of the site is open and has been the subject of some natural regeneration.
- 2.2 I understand that the rear (east) part of the site was previously occupied by a two and three storey Old Telephone Exchange building which was demolished approximately 4 years ago.
- 2.3 The existing former Masonic Hall is a pitched roof building with a full footprint of ground floor accommodation and an additional floor of accommodation within the pitched roof over the original structure. It also has a later single storey side extension adjacent to the southern boundary of the site opposite the Tothill multi storey car park.



**The Appeal Site Viewed from the Rear of the Elmsleigh Centre Service Area looking West (PH)**

- 2.4 The site is encircled by Elmsleigh Road which enters from Thames Street via a roundabout junction and then offers a number of options including ramped access from the multi storey car park, access to the service area at the Tothill building, access to the circular Elmsleigh Road which accesses car parking and servicing at the rear of High Street and Debenhams and the Tothill multi storey car park access ramp. It also offers access via a control<sup>1</sup> to a ramped access to the service area of Elmsleigh Centre which, delineates and rises alongside the north and western boundary of the appeal site.

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<sup>1</sup> A red and green light system to prevent conflict between vehicles via one way access on the ramp



**Rear of High Street and Pedestrian Access to High Street From Elmsleigh Road Looking under the Ramp North © Google**



**Rear of the Former Debenhams Building from the Roundabout Exit to the Service Ramp Looking North West (PH)**

- 2.5 The Former Debenhams building has a four storey scale with parts of the rear of the building reducing to two and three storeys. Properties in the High Street are generally two and three storey in scale backing onto the appeal site. Single storey buildings are also evident along the rear of High Street. The northern boundary of the appeal site is delineated by the ramped access to the Elmsleigh Centre service area which ascends west to east.





**The Service Ramp Viewed from Elmsleigh Road © Google**

- 2.6 The Tothill multi storey car park features ramped access to and from the car park and access to the servicing areas all from Elmsleigh Road opposite the appeal site. The car park has a five storey scale.



**Tothill Multi Storey Car Park from the Rear of the Elmsleigh Centre looking West including the Rear of the Masonic Hall (PH)**

- 2.7 Beyond the Tothill multistorey car park to the south is Communications House a five storey office building. Fronting Thames Street and abutting the multi storey car park is the single storey Staines Library and Museum.
- 2.8 To the east of the appeal site is the rear of the Elmsleigh Centre and the ramp that runs alongside the northern boundary of the appeal site provides access to the servicing area atop the building.



**The Rear of the Elmsleigh Centre viewed across the appeal site from the service ramp (PH)**

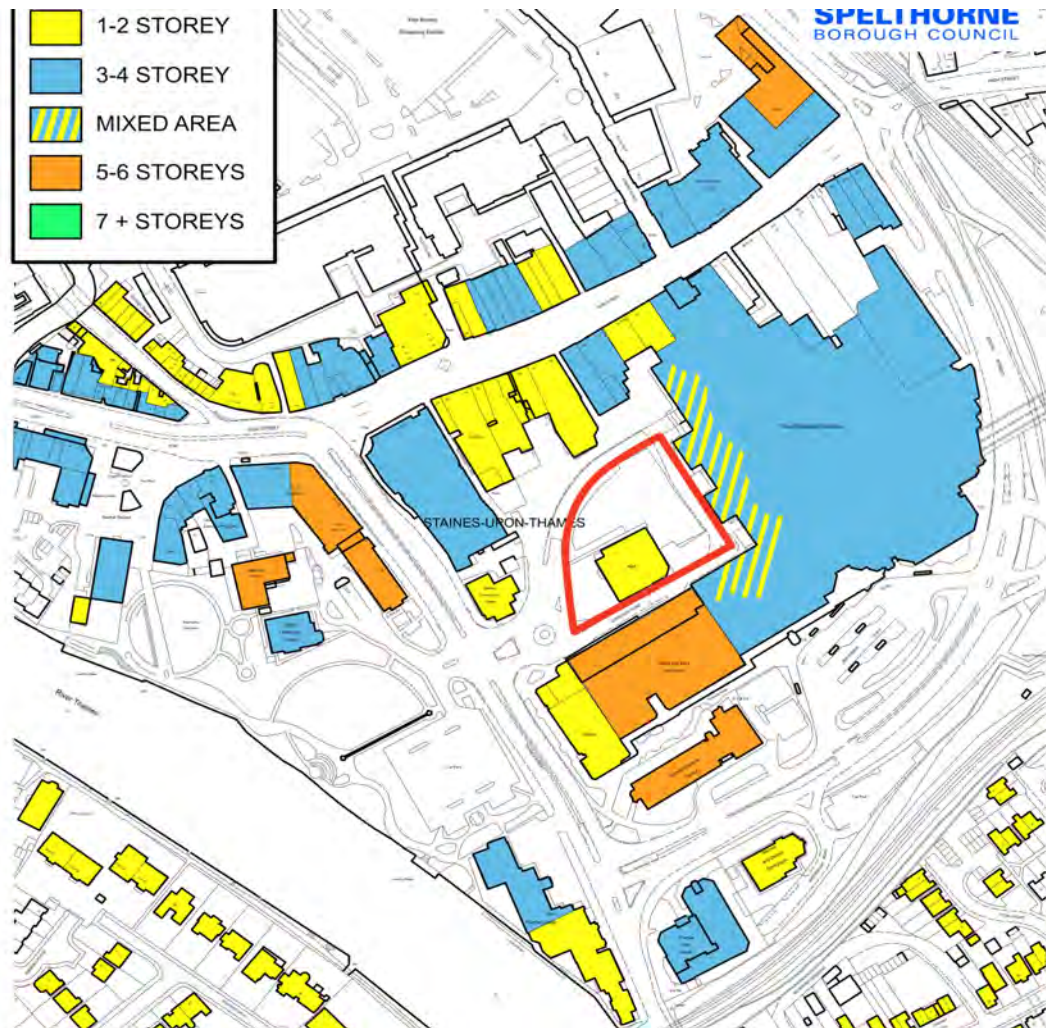
- 2.9 The Elmsleigh Centre has a two and three storey scale along the Elmsleigh Road boundary with the elevations finished in red brick.
- 2.10 To the west of the appeal site is the roundabout junction on Elmsleigh Road I described earlier then Thames Street and to the west of that an open area of amenity land (the Memorial Garden) and a surface level car park. These sit in front of the River Thames along which a riverside footpath/ towpath runs and between the two and three storey Thames Lodge Hotel to the south and the four to six storey mixed use buildings at 14 Thames Street, Kingsbridge House - formerly Forum House and Swans View to the north.
- 2.11 To the west of the Thames are predominately two storey domestic buildings comprising dwellinghouses and apartments.
- 2.12 On the east side of Thames Street at its junction with High Street is the attractive four storey former Debenhams building and between it and the appeal site is the two storey Staines Community Centre.



**Thames Street Looking North including the Community Centre and Former Debenhams Buildings (PH)**

- 2.13 I have included at **Appendix 1** a location plan with the names of buildings that I have used.
- 2.14 The existing scale of development in and around the appeal site ranges from single storey to six storeys of development.
- 2.15 I include at **Appendix 2** a plan that shows the scale of existing development in and around the appeal site, an extract of that plan is reproduced below.





**Heights of Neighbouring Buildings**

- 2.16 I acknowledge that the site is located centrally within Staines close to shopping and public transport facilities as comprises part of the defined Staines Main Shopping Area and Employment Area and is allocated as part of the Elmsleigh Centre (A10) site.
- 2.17 Staines railway station is located to the south east of the appeal site a walk of 1 kilometre from the appeal site. The Elmsleigh Centre bus stops are located on the eastern side of the Elmsleigh Centre accessed either through the Elmsleigh Centre or from South Street.
- 2.18 The roads in and around the appeal site are subject to parking and waiting restrictions and car parks are subject to charging regimes. The closest roads without parking restrictions are located south of the appeal site and south of the junction of Thames Street and South street around Richmond Street and Gresham Street east of Laleham Road.
- 2.19 The site comprises part of an area of high archaeological potential as part of the historic core and site of the Roman Town and is located in Flood Zone 3A, an area liable to flood.

### **3 The Application the Subject of the Appeal and Relevant Planning History**

- 3.1 Section 2 of the Council's committee report details the recent planning history of the appeal site and land immediately adjacent comprising the phase 2 extension to the Elmsleigh Centre. Whilst informative and providing context for the appeal site the history relating to the Elmsleigh Centre is largely not relevant to the issues before the Inquiry.
- 3.2 Reference has been made to the previous telephone exchange building at the appeal site which was demolished some years ago. That building is no longer part of the context for considering new development but as a matter of fact it ranged in scale from two to three storeys with a small plat area comprising a fourth storey on the northern part of the building.



**The former Telephone Exchange Building © Google Streetview**

- 3.3 The appeal site has been the subject of two relevant applications one related to the use of the site as a hand car wash facility which was permitted in 2014 and the other was a refusal in 2015 for the redevelopment of the site for a mixed use scheme comprising 140 dwellings, a hotel, mixed use commercial space and a masonic lodge.
- 3.4 Section 2.1 of the committee report ([CD3.1](#)) details the ten reasons for refusal associated with that later application. The application proposed the redevelopment of the appeal site with a cascade of buildings of varying storey heights accommodating a hotel, market and affordable housing and commercial floorarea.



**East West Cross section of the 2015 Proposed Redevelopment**

- 3.5 I acknowledge that redevelopment has taken place in and around the town centre area. Most notably to the north east of the town centre outside the inner ring road (i.e. Mustard Mill Road/ South Street/ Thames Street/ Bridge Street).



**Charter Square Viewed from High Street east**

- 3.6 Details of the permitted scheme at Charter Square is provided at CD10.1 wherein the Inspector will note the redevelopment of the site with a range of buildings comprising predominately buildings of 9 storeys in height but with a 13 storey tower at the northern part of the site comprising part of Phase 1B (17/01923/FUL) and also including 5 and 6 storey elements.
- 3.7 Car parking is provided at basement and ground level throughout the Charter Square development.
- 3.8 The redevelopment of Bridge Street car park (CD10.2) was permitted incorporating a range of buildings rising from 4 to 5 to 8 to nine storeys with a twelve storey block and basement car parking.



## 4 Planning Policy Considerations

### Development Plan Policy

- 4.1 The development plan for the area comprises the Spelthorne Core Strategy and Policies Development Plan Document (CD5.2), which was adopted in February 2009, the Spelthorne Allocations DPD (2009) and the Saved Policies of the Spelthorne Local Plan (2001). The following policies of the Core Strategy are considered relevant to the consideration of the appeal (I have **highlighted** the policies identified in the reason for refusal):

- SP1 (Location of Development)
- LO1 (Flooding)
- SP2 (Housing Provision)
- HO1 (Providing for New Housing Development)
- HO3 (Affordable Housing)
- HO4 (Housing Size and Type)
- HO5 (Housing Density)
- EM1 (Employment Development)
- SP4 (Staines Town Centre)
- TC1 (Staines Town Centre)
- TC2 (Staines Town Centre shopping Frontage)
- CO1 (Providing Community Facilities)
- CO2 (Provision of Infrastructure for New Development)
- CO3 (Provision of Open Space for New Development)
- SP6 (Maintaining and Improving the Environment)
- **EN1 (Design of New Development)**
- EN3 (Air Quality)
- EN5 (Buildings of Architectural and Historic Interest)
- EN6 (Conservation Areas, Historic Landscapes, Parks and Gardens)
- EN8 (Protecting and Improving the Landscape and Biodiversity)
- EN9 (River Thames and its Tributaries)
- EN11 (Development and Noise)
- EN15 (Development on Land Affected by Contamination)
- SP7 (Climate Change and Transport)
- CC1 (Renewable Energy, Energy Conservation and Sustainable Construction)
- CC2 (Sustainable Travel)
- **CC3 (Parking Provision)**

- 4.2 The site is located within the designated Allocation A10 site (The Elmsleigh Centre and adjoining land) in the Council's Allocations Development Plan Document December 2009 (CD5.3). This requires a comprehensive redevelopment that would complete the redevelopment of Staines south of the High Street and provide a completed and attractive frontage to the whole of Thames Street on its east side.



- 4.3 Allocation A10 was intended to assist in delivering Strategic Policy SP4 improving Staines and ensuring its town centre remain the focus of new retail development. It also supports Policy TC1 which identifies additional retail floorspace at the Elmsleigh Centre. The allocation also includes a residential element on the upper floors which supports Strategic Policy SP2 and detailed Policy HO1(a) in identifying specific housing allocations.
- 4.4 The Council accept that reduced weight should be given to this policy and allocation due to changes in circumstances that have occurred since 2009 as detailed in committee report.
- 4.5 Also of relevance is Saved Policy BE25 of the Spelthorne Local Plan 2001 (CD5.1) which states:

*“In considering proposals for development within areas of high archaeological potential, the Borough Council will:-*

- a. require an initial assessment of the archaeological value of the site to be submitted as part of any planning application*
- b. expect the applicant to arrange an archaeological field evaluation to be carried out prior to the determination of the planning application, where, as a result of the initial assessment, important archaeological remains are considered to exist*
- c. have a preference for preservation in situ, and in such circumstances will impose conditions or seek a legal agreement, where appropriate, to ensure that damage to the remains is minimal or will be avoided*
- d. require by planning condition or seek a legal agreement to secure a full archaeological investigation and recording of the site and subsequent publication of results in accordance with a scheme of work to be agreed in writing with the Council prior to the commencement of the proposed development, where important archaeological remains are known or considered likely to exist but their preservation in situ is not justified.”*

- 4.6 The development plan was adopted prior to the first publication of the Framework in 2012 (and subsequent revisions culminating in the current 2021 version) and sought to provide housing in line with the requirements of the Regional Spatial Strategy for the South East (“the RSS”).
- 4.7 The RSS has been withdrawn by Government and the Framework requires local authorities to provide a five year supply of deliverable housing land to accord with their needs.
- 4.8 In 2015 the Council published a Strategic Housing Market Assessment (SHMA) in partnership with Runneymede Borough Council. That identified the OAN for Spelthorne for the period 2013 – 2033 to be within the range 552 – 757 homes per annum.

- 4.9 The Standard Method requires the provision of 611 dwellings per annum. Adding a 20% buffer to account for under delivery and having regard to the supply of housing land my understanding is that the Council is now able to show only a 4.5 year's supply of housing land<sup>2</sup>.
- 4.10 I also note that the Housing Delivery Test result was just 50% in February 2021, again this engages the presumption in accordance with NPPF paragraph 11(d)(ii).
- 4.11 The adopted Core Strategy sought to provide 166 dwellings per annum over that plan period (2006 – 2026), however that was based on the now withdrawn RSS allocation. I acknowledge that the Council is unable to demonstrate a five-year supply of deliverable housing land. Therefore the most important policies of the plan are out of date in accordance with footnote 8 to the NPPF and therefore in line with paragraph 11(d)(ii) the *tilted balance* comprises the appropriate approach to decision making and permission should be granted unless:
- “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”*
- 4.12 In light of the Council's position on housing land supply the Council acknowledge that the delivery of housing is a matter that should carry significant weight in any planning balance and also acknowledge that the delivery of affordable housing is a matter that also weighs in favour of the grant of planning permission and the application proposal of 46% provision should be afforded substantial weight.
- 4.13 The development plan currently does not include policies to deliver the up to date housing needs within Spelthorne and Policy SP2 is out of date for such purposes.
- 4.14 Policy EN1 (Design of New Development) is consistent with the Framework, in particular paragraph 8 and section 12 insofar as both seek to achieve high standards of design and layout for new development.
- 4.15 Policy CC3 (Parking Provision) requires appropriate provision for car parking in line with the maximum car parking standards. The policy is consistent with the NPPF and in particular paragraph 107. The Council's adopted supplementary planning guidance and car parking standards (updated in 2011) (CD5.6) operate as minimum standard in respect of residential development whereas the Surrey County Council standards (adopted 2018) (CD5.7) operate as maximum standards.

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<sup>2</sup> Statement of Five Year Housing Supply - Deliverable Housing Sites as at 1 April 2021

### Emerging Policy and SPD

- 4.16 The Council's adopted Supplementary Planning Documents in respect of the Design of [...] New Residential Development (2011) (CD5.4), Housing Size and Type (2012) (CD5.5) and Flooding (2012) (CD5.8) are also relevant to this appeal.
- 4.17 The Council is currently preparing a replacement Local Plan for the period 2020 – 2035. They consulted on the Issues and Options in 2018 (CD5.9) and a call for sites closed on 3 March 2021. Consultation on the Publication Local Plan is anticipated in early 2022 with the plan being submitted in June 2022 and adoption anticipated in mid 2023.
- 4.18 My view is that at this time the emerging local plan carries negligible weight.
- 4.19 In addition, the Council is preparing a Development Framework DPD for Staines (previous referred to as a masterplan), the document will comprise a Supplementary Planning Document. A report has been out to consultation and the period for responses to the questionnaire expired in June 2021. It is anticipated that submission and adoption of this DPD will be concurrent with the Local Plan. At this stage the development framework carries negligible weight.

### National Policy

- 4.20 The NPPF (2021) sets out the Government's approach to achieving sustainable development and the three overarching objectives (8) as well as the presumption in favour of sustainable development at paragraph 11. In the context of this appeal it is common ground that the Council cannot demonstrate a five year supply of deliverable housing land and therefore in accordance with footnote 8 this means that the policies most important for determining the application are out of date. Paragraph 11(d)(ii) then requires that the decision maker grants permission unless:

*"any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

- 4.21 Section 5 reinforces the Government's policy to significantly boost the supply of housing including that required for affordable housing, older people, families with children, people with disabilities and people who wish to build their own homes. It sets out the approach to affordable housing and reflecting the need for housing to be met on sites to provide for the objective of creating mixed and balanced communities.

- 4.22 Section 12 seeks to provide guidance on achieving well designed places and reiterates the Government policy that

*“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”*

- 4.23 Paragraph 130 of the NPPF requires policies and decisions to ensure developments, inter alia:

- a) *“will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users<sup>49</sup>; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. “*

- 4.24 In addition, Section 9 promotes sustainable transport and section 7 relates to the vitality of town centres, as well as section 11 making effective use of land and in this context it notes:

*“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.”*

- 4.25 As noted in the National Design Guide:

*“The National Planning Policy Framework makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. [...]”*

- 4.26 The National Planning Practice Guidance (PPG) cross references the National Design Guide which can be used as a tool by all those involved in shaping places through plan making and decision making<sup>3</sup>.

- 4.27 The National Design Guide (NDG) (CD4.3) as referenced in the PPG sets out 10 characteristics and states that good design considers how a development can make a positive contribution to all 10 characteristics.

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<sup>3</sup> Reference ID: 26-001-20191001 and 26-016-20191001

- 4.28 It advises that a well-designed place is unlikely to be achieved by focusing only on the appearance, materials and detailing of buildings and it comes about through making the right choices at all levels, including *inter alia* the form and scale of buildings<sup>4</sup>. It then goes on to define layout, form and scale noting:

*“Scale is the height, width and length of each building proposed within a development in relation to its surroundings. This relates both to the overall size and massing of individual buildings and spaces in relation to their surroundings, and to the scale of their parts. [...]*

*Enclosure is the relationship between the height of the buildings across a space, and the dimension of the space itself. Taller building heights and a more built up building line both increase the enclosure. Different degrees of enclosure influence how people use different spaces, by creating differences in character that suit different activities.”*

- 4.29 The first of the ten characteristics is context within which the role of good design is to enhance the surroundings. The NPG advises that well designed new development responds positively to the surrounding context and details a number of physical features including existing built development including layout form, scale etc.

- 4.30 The NPG states *inter alia*<sup>5</sup>:

*“Well-designed new development is integrated into its wider surroundings, physically, socially and visually. It is carefully sited and designed, and is demonstrably based on an understanding of the existing situation, including [...]:*

*patterns of built form, including local precedents for routes and spaces and the built form around them, to inform the layout, grain, form and scale;*

*the architecture prevalent in the area, including the local vernacular and other precedents that contribute to local character, to inform the form, scale, appearance, details and materials of new development. [...]*”

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<sup>4</sup> NDG Paragraph 21

<sup>5</sup> NDG Paragraph 43

## 5 The Application the Subject of the Appeal

- 5.1 The application sought the demolition of all the existing buildings on site and the redevelopment of the site with two tall buildings providing 206 dwellings.



**Proposed West Elevation of the two Proposed Towers**

- 5.2 Block A is a total of 51.4 metres tall and comprises sixteen storeys in height (with 15 storeys of accommodation) and Block B is 44.5 metres tall and 14 storeys in height (with 13 storeys of accommodation). The buildings are arranged with Block A in the north east part of the site and Block B in the south west part of the site.
- 5.3 Block A provides 112 private market housing units (57 one bedroom and 55 two bedroom flats) and Block B 94 affordable housing units (48 one bedroom and 46 two bedroom flats).
- 5.4 At ground floor the site will accommodate a car park and servicing area. The area will provide 48 car parking spaces (including 10 accessible spaces) 220 cycle parking spaces (including 12 short stay cycle spaces for public use within the public realm) 6 motorcycle spaces and 2 car club spaces and also includes bin storage.
- 5.5 Above this area is an elevated podium level containing some landscaping and a play area.



**Proposed Ground Floor**

- 5.6 A full description of the proposals is provided at section 3 of the committee report ([CD3.1](#)).
- 5.7 A schedule of responses from consultees is provided at section 4 of the committee report and section 5 summarizes the 82 responses received to the public consultation.
- 5.8 As noted in section 1 of my proof I acknowledge that the application was recommended for conditional planning permission subject to a section 106 agreement to secure infrastructure and 46% affordable housing.

## **6 Planning Considerations**

6.1 The Inspector's Case Management Conference Pre Conference Note records the main issues as:

- The effect of the proposal on the character and appearance of the area.
- The effect of the proposal on the living conditions of the occupants of nearby properties with regard to car parking.

6.2 Within this section I address:

- Character and appearance
- Car parking
- S106 and conditions
- Planning balance.

6.3 I acknowledge the benefits of the proposed development noting the provision of new housing in an area which cannot currently demonstrate a five year supply of deliverable housing land should be ascribed significant weight. I also apportion the proposed provision of 46% affordable housing substantial weight despite provision at 46% falling a little short of the Policy HO3 target of 50%.

6.4 In terms of the regeneration of the appeal site I consider that to be capable of being a benefit of the scheme, however it is not a benefit at the costs of poor design and adverse impacts on amenity.

6.5 For the purpose of clarity my understanding and experience is that there is no moratorium in respect of applications for new residential development in Staines. Developers are able to bring forward applications and the Council will not resist applications on the basis of an in principle objection to redevelopment within Staines. I consider this to be demonstrated by the application the subject of this appeal which has not been refused on moratorium or in principle grounds.

6.6 I do note that the Council has paused its own programme of land disposal and applications in respect of land it owns around Staines pending the outcome of the consultation in respect of the emerging Staines Development Framework.

6.7 I do not ask the Inspector to dismiss this appeal and refuse permission on the basis that it delivers only residential uses and not a mix of uses. I similarly do not ask the Inspector to refuse planning permission on the simplistic basis of it proposing buildings that are taller than neighbouring buildings on the appeal site, my objection is to the specific impact of these proposed buildings.



## **Character and Appearance**

- 6.8 I am a chartered town planner and I do not purport to be undertaking any technical exercise in assessing the impact of the proposals on the character and appearance of the area. I am analysing my own findings and observations as well as reviewing the documentation to enable me to come to a reasoned judgement in respect of my view that the proposals will adversely affect the character and appearance of the immediate locality and in particular the immediate context.
- 6.9 I have included at **Appendix 2** an annotated location plan showing the height of surrounding buildings to the appeal site by reference to the number of storeys in each building.
- 6.10 It shows the context of the appeal site is a low to medium height context of built development.
- 6.11 The buildings that provide the immediate context for the appeal site comprise:

- the rear of properties in the High Street are located north of the appeal site, these have a 1 – 3 storey scale which I consider to be low rise in height, the northern side of High Street is similarly characterised by predominantly 2 and 3 storey buildings.

To the rear of the northern side of the High Street properties are two large box type retail units that form part of the Two Rivers Retail Park that have a similar height to the buildings fronting High Street;

- the Elmsleigh Centre to the east which is a large brick faced big footprint building with a 2 – 3 storey scale, in height terms. I consider it to be low rise and it extends east to South Street;
- the Tothill multistorey car park and library complex is located south of the appeal site and adjoins the Elmsleigh Centre. The multistorey car park has six levels (one being the flat roof of the structure) and is equivalent to a four or five storey building in height. Beyond these buildings is the five storey Communication House and the open bus station. I consider this part of the context to comprise part of a low to medium rise scale of built form.

A four storey office building is located on the southern side of South Street/ Thames Street junction and then an area of two storey domestic scale dwellings beyond the railway lines; and

- the two storey community centre and four storey former Debenhams building together with the single storey library provide the context to the west on the eastern side of Thames Street. On the west side of Thames Street is open land comprising a Memorial Garden and surface car park open to the riverside.
- On the opposite bank of the Thames are two storey domestic scale buildings. North of the surface car park is a group of buildings with 3 – 6 storey scale<sup>6</sup> fronting Thames Street and the Memorial Gardens. South of the surface car park is a hotel varying in scale from 2 – 3 storeys and to the west of the Thames are predominately two storey domestic scale buildings. I consider this to be a low to medium scale of built development.

- 6.12 Overall I consider the immediate context for the proposed development to comprise low to medium scale buildings as well as the open aspect to the Thames.
- 6.13 I acknowledge that taller buildings do exist in Staines, however they are not read as part of the townscape within which the proposed appeal site is encountered.
- 6.14 As described earlier approximately 350 metres north of the appeal site beyond the South Street/ Mustard Mill Road internal ring road and beyond the railway line is an area of newly developed apartments at Charter Square on the sites of former commercial properties.
- 6.15 The apartments have been developed in a range of blocks varying in height between 3 – 13 storeys. That site lies adjacent to a commercial site (Renshaw) and a telephone exchange site that has a pre-existing 10 storey building.
- 6.16 The tall building on that site is visible along parts of the High Street but not readily from Thames Street other than from the junction with Elmsleigh Road where the tower is visible as a distant feature on the skyline. I do not consider you get a feel for the overall height and scale of the building from this perspective.

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<sup>6</sup> Fifth and sixth storeys on the buildings fronting Thames Street are recessed



**Existing View of the Appeal Site from Thames Street with the Tower in the Background (PH)**

- 6.17 In assessing the appeal scheme via a site visit and perusal of all the documentation the Inspector will be able to form their own views and undertake an assessment of the baseline pursuant to the site visit experiencing the immediate and wider context and site kinetically passing through and around the area.
- 6.18 I have no reason to dispute the Appellant's zone of theoretical influence of the appeal scheme as illustrated on Figure 5 of the TVA.
- 6.19 I acknowledge that the viewpoints in the Appellant's Townscape Visual assessment (TVA) are a useful aide for assessing the impact of the proposed development. I don't dispute the range of viewpoints selected but they are no substitute for the three dimensional multi sense experience walking or travelling through and around the area. In particular slight deviations from the exact viewpoints can reveal more or less of a building and the experience of most receptors will be kinetic.
- 6.20 I now focus on viewpoints 1, 2 and 3 as well as 5 and 7 in identifying the harm arising from the incongruity of the proposed buildings. I will also make reference to Viewpoint 9.
- 6.21 For balance I do not allege that harm to justify refusal of permission arises in respect of viewpoints 4, 6, 8 or 10.

6.22 I now consider the issue by reference to the following (having adopted rough descriptions of orientation for ease of reference):

- i. Views from West (including Viewpoints 1 and 2)
- ii. Views from South (including Viewpoint 3)
- iii. Views from North (including Viewpoints 5 and 7)
- iv. Views from North West (including Viewpoint 9)

#### Views from the West

6.23 I first consider views from the west looking east these encompass private views from dwellings that back onto the Thames, public views from the Thames footpath alongside the western bank including Viewpoint 1, public views from the Thames footpath alongside the eastern bank, public views from the memorial garden (Viewpoint 2) and car park, views from Thames Street and the approach from Elmsleigh Avenue.

#### *Private Views*

- 6.24 The residents of properties with views across the Thames have a slightly more expansive view than those passing along the towpath given their elevated position. They are unable to discern the existing building at the appeal site and will appreciate the regularity of built form in terms of height in the vista.
- 6.25 The proposals will significantly interrupt the open sky component of the vista and present a noticeable change to the skyline.



**Existing View from the Thames Western Towpath (PH)**

- 6.26 Different properties will experience different views and whilst existing vegetation may screen the lower elements of the proposed buildings the height of the proposed buildings will be evident in most views which are from a position elevated above the towpath.
- 6.27 The residents of these properties in The Hythe/ Simmons Place and/ or Riverside Drive are highly sensitive to change and the focus of their houses and private gardens are over the Thames. I consider the change to their view would be medium high given the scale of the proposed buildings and their dominance in the vistas from these properties.
- 6.28 Whilst the Thames will remain the focus from these properties the proposed buildings will disturb that focus and in my view the visual effect would be of dominant tall buildings. I consider the interruption of the skyline and the scale of the proposed buildings would have a **moderate to major adverse visual effect** for occupier of dwellings along the western bank of the Thames.

*Public Views Western Towpath*

- 6.29 Viewpoint 1 is from the towpath along the western bank of the Thames, it shows the towering presence of the two proposed buildings which loom over the neighbouring buildings and dominate the vista.



**Extract from Viewpoint 1 (TVA)**



- 6.30 In my view the existing building is not apparent in either winter or summer views from this viewpoint or from other vantage points along the western towpath. If it can be perceived it is against the backdrop of the Elmsleigh Centre or the multi storey car park dependent on the exact viewpoint. No leisure user will be focussed on the existing building and in my view the existing building is neutral in effect in these views.
- 6.31 The proposed buildings will be visible along the significant lengths of the western towpath from the Staines Rowing Club in the south to the Staines Bridge in the north. Unlike the existing building the proposed buildings will draw the eye and dominate views across the Thames.
- 6.32 I consider the proposed buildings will be visible in both the existing towpath views below and all points in-between as part of a kinetic experience travelling along the footpath. The nature and scale of the buildings can easily be understood from the proposed viewpoint 1 imagery extracted above.



**Existing View from the Western Towpath with Staines House Visible (PH)**

- 6.33 On my visits to the area I have noted the towpath is well used by walkers, residents, visitors, patrons of the public house and dog walkers. These leisure users are sensitive to change and in my view whilst the existing buildings do not contribute to amenity they are recessive so the Thames is the focus of views. The proposed tall buildings will erode the focus of these views and I agree with the Appellant's assessment of high susceptibility. Whilst I accept the town centre context and backdrop to the appeal site I consider sensitivity to tall buildings to be high from these viewpoints.



**Existing View from the Western Towpath Looking toward the Hotel (PH)**

- 6.34 I do disagree with the Appellant's assessment that the degree of change in viewpoint 1 would be medium, I consider the introduction of tall buildings in this viewpoint would break the skyline and would not be ameliorated by the existing buildings. I consider the degree of change to be medium high depending on the exact viewpoint but medium high as part of a kinetic experience travelling along the towpath.
- 6.35 I consider the interruption of the skyline and the scale of the proposed buildings and their incongruity would have a **moderate to major adverse visual effect** for leisure users along the western bank of the Thames.

*Public Views Eastern Towpath and Memorial Garden*

- 6.36 Views from the towpath are filtered by landscaping in the foreground and will vary dependent on the season and exact position travelling along this path. In summer views between trees and vegetation of the proposed buildings will be revealed as part of the journey in winter months the proposed buildings will be evident along a greater proportion of the journey from the hotel in the south to the Old Town Hall in the north.
- 6.37 On my visitors to the area I noted most leisure users, office workers and residents passing along and through this area tended to pass along both the towpath and the through parts of the memorial gardens including office workers having lunch in the memorial gardens, tourists and visitors walking the towpath and stopping in the memorial gardens or riverside and visitors just visiting the Memorial Gardens.

- 6.38 On my visits to the area I have noted the area is well used by walkers, residents, visitors, shoppers and dog walkers. These leisure users are sensitive to change and in my view whilst the existing buildings do not contribute to amenity they are recessive so the Thames and gardens are the focus of views. The proposed tall buildings will erode the focus of these views and draw attention. I disagree with the Appellant's assessment of susceptibility which I consider to be medium to high (my observation in this area is that people do not just pass through but stop and enjoy the ambience of the area including office workers congregating to eat lunch in this area and visitors stopping and congregating in the area). Whilst I accept the town centre context and backdrop to the appeal site and the Thames as the focus of views I consider sensitivity to tall buildings to be high from these viewpoints.



**Extract from Viewpoint 2 (TVA)**

- 6.39 In terms of the experience I note viewpoint 2 is from head on to the proposed buildings, as one moves north or south the gap between the buildings diminishes and the side elevation of the buildings becomes more prominent in views. I acknowledge that in certain views from the south parts of the northern building will be obscured by the southern taller building.
- 6.40 In addition as one moves closer to the buildings through the Memorial Gardens or in the car park the greater the sense of the buildings looming tall over the receptor and the greater the appreciation of the disparity in scale between the existing buildings and the proposals.



- 6.41 In the view below the existing building sits below the Elmsleigh Centre and does not interrupt the skyline. However the 13 storey tower located 350 metres to the north east is visible but not prominent in this view. Given the stagger between the two buildings I expect the gap would not be visible and part of the northern shorter tower may be obscured by the taller tower.



**Existing View from the Car Park of the Appeal Site (PH)**

- 6.42 I do agree with the Appellant's assessment that the degree of change in viewpoint 2 would be medium to high although I lean toward it being high in viewpoint 2, I consider the introduction of tall buildings in this viewpoint would break the skyline and would not be ameliorated by the existing buildings to which their scale does not relate. I consider the degree of change to be medium high depending on the exact viewpoint but medium high as part of a kinetic experience travelling along the towpath and from the Memorial Garden.
- 6.43 I consider the interruption of the skyline and the scale of the proposed buildings and their incongruity would have a **moderate adverse visual effect** for leisure users along the eastern bank of the Thames and a **moderate major adverse visual effect** within the Memorial Garden having regard to the introduction of uncharacteristic scale of development conflicting with the existing scale of townscape development in this experience.
- 6.44 I do not share the Appellant's view that the introduction of these tall buildings in this viewpoint would have beneficial visual effects. Whilst I consider some of the detailing of the proposed buildings and the use of materials assists in providing satisfactory detailing for the proposed building it does not overcome the incongruous scale of the buildings and the abrupt relationship with the surrounding context.

- 6.45 I do not consider that this is the sort of case where the proposed buildings are of outstanding or show-stopping architecture to benefit any view.

*Public Views Thames Street*

- 6.46 As one moves closer to the appeal site the looming presence of the proposed tall buildings will be accentuated. In that respect public views within the car park and walking along the pavements either side of Thames Street will provide views of the proposed buildings that will change on any trip north to south or south to north past the site.



**Existing View from Thames Street Western Pavement Looking North East (PH)**

- 6.47 In the view above the towers would protrude into the skyline above the multistorey car park and the former Debenhams buildings. The taller southern tower would obscure the northern tower in this view.
- 6.48 I recognise that the majority of pedestrians passing along Thames Street are unlikely to be engaged on leisure pursuits and my impression at site visits was that the majority were either shoppers walking to or from the town centre or employees walking to their place of work or from their place of work into the town centre.
- 6.49 However I do consider these receptors will experience the jarring juxtaposition of the proposed tall buildings within this low to medium building height context.

- 6.50 Whilst they may pass the site as it is now without recourse to any focus on the site I do not think that will be the case should the buildings proposed be erected. I consider focus would shift for any receptors from the riverside and open gardens to the west and town centre cluster of built form to the east and north to the proposed tall buildings being the main focus. The degree of change would be medium to high in these views and along this kinetic journey.
- 6.51 I recognise that these receptors will have less sensitivity to change and that their focus may not be on the urban character of their surroundings but rather the road and their journey north or south. Likewise drivers of vehicles passing along Thames Street will have a lower sensitivity to change. Some passengers in vehicles including on public transport may have a higher sensitivity to change as they pass along Thames Street past the appeal site.
- 6.52 Overall I consider the visual effect of the proposals on the journey along Thames Street would be **minor adverse**.

*Elmsleigh Road*

- 6.53 Finally for completeness from the west I consider the approach to the appeal site along Elmsleigh Road having turned off Thames Street. I recognise that this is not one of the viewpoints positions detailed in the TVA however it is part of the experience from the west and represents the closer perspective advancing toward the site (i.e. from VP1 then onto VP2 and then Elmsleigh Road).



**Existing View of the Site from Elmsleigh Road (PH)**

- 6.54 Pedestrians, drivers and passengers alike would be confronted by the looming presence of the two tall buildings set between the multi storey car park and the former Debenhams building and community centre.
- 6.55 The foreground to this experience is dominated by the highway infrastructure including the roundabout and multiple limbs accessing the ramp to the Elmsleigh Centre service area, Elmsleigh Road and the Tothill multi-storey car park.
- 6.56 The proposal seeks to rationalise the highway in this area removing the roundabout and introducing some landscaping in lieu of the current extent of hardsurfacing.
- 6.57 I accept that these changes would be positive and beneficial and I welcome them, however the degree of change would be very limited and of themselves they have a negligible positive visual effect on the area.
- 6.58 However the overall composition of this experience will remain disjointed with the two towers imported into the content without addressing the relationship of the ramp to the site, the expanse of surface car parking that envelops part of the site, the rear service arrangements to properties in High Street and the former Debenhams building.
- 6.59 The proposed towers would be the dominant component of any experience. The area has a disjointed, untidy and poorly composed appearance. The rear service areas of properties in High Street sit with open car parking ramps to the service area and the multi storey car park and a looped service road that encapsulates the appeal site. The existing building sits as an incident in this tableau where the dominant features are the multi-storey car park and the ramped access to the Elmsleigh Centre.
- 6.60 Whilst I have some misgivings about the proximity of the buildings to the ramp and multi storey car park I do not consider the proposed plan form of the proposals to be an inappropriate response to the setting. However, the use of a podium does present a wall to the views from Elmsleigh Road and not an open appreciation of the podium greenery which is elevated above this view.
- 6.61 I also recognise the use of different material across the two buildings with the unifying use of materials from Block B for the podium level is an acceptable response to context and assist with the integration of the buildings. I also accept that the architectural detailing of the buildings and the rhythm in those elevations is a positive feature of the design. However for reasons I set out such positive features do not mitigate the adverse impact so the proposals to an acceptable degree

- 6.62 The looming presence of such tall buildings in the immediacy of this context would be oppressive and dominant without context and a relationship to the prevailing scale of buildings. The proposed height of the buildings would enclose and dominate the experience to the detriment of the obscuring a large proportion of the sky component of this view.
- 6.63 I recognise that the majority of receptors current experiencing views travelling into Elmsleigh Road are drivers of cars and commercial vehicles. Pedestrians have to engage with the complicated highway arrangements and are usually using the cut through to the High Street or are accessing the rear of buildings in High Street. Therefore, I would assess sensitivity of such receptors to change to be low.
- 6.64 The degree of change proposed would be high and whilst there are some limited beneficial elements to the change I consider the overall visual impact to be **negligible/ minor adverse** insofar as it relates to Elmsleigh Road.



### Views from South

- 6.65 The approach along Laleham Road and Thames Street beyond the railway bridge travelling north across the junction with South Street and toward the junction with Elmsleigh Road is part of a kinetic journey which includes Viewpoint 3.
- 6.66 I accept that most receptors are unlikely to be focussed on visual amenity but they will have an awareness of the prevailing scale of buildings having passed under the railway bridge on Laleham Road residents or visitors to the town centre will encounter a mixture of buildings ranging from 2 – 6 storeys in height.
- 6.67 The existing viewpoint shows the five storey Communications House in the foreground with the Tothill multi storey car park located behind it. The four storey Debenhams building is visible in the background of the existing view.
- 6.68 The tallest building in the existing viewpoint is five storeys. The experience in this area also includes the four storey Thames Side House on the south eastern junction of South Street with Thames Street and the tow storey Thames Lodge buildings. The image below is taken from Laleham Road just south of South Street outside Thames Side House.



**Existing View Looking North South of Viewpoint 3 (PH)**

- 6.69 The proposed development is shown in Viewpoint 3 looming tall over Tothill multistorey car park and it would also be visible in closer and wider views on this approach from the south.

- 6.70 In views from a wider range of point on the approach from the south the building would either be viewed peering over Communications House in views such as that above or over Tothill multi storey in the viewpoint and journeys travelling north along the western pavement of Thames Street.



**Extract from Viewpoint 3 (TVA)**

- 6.71 As one gets closer to the site on the western pavement one would start to get views of Building B revealed such as from the viewpoint below.
- 6.72 Pedestrians travelling north included a mixture of office workers (travelling to or from work and to take lunch in the memorial gardens), joggers and cyclists, residents and recreational walkers accessing the Thames side and Memorial Garden.
- 6.73 I recognise that the majority of receptors currently experiencing views travelling are drivers of cars and commercial vehicles, cyclists and pedestrians crossing travelling toward High Street or accessing the Thames. They are not predominately engaging in leisure pursuits but I do consider they would have an appreciation of the coherent scale of buildings in the view and how they address the roads and the focus would be toward the memorial Gardens and the former Debenhams building. Therefore, I would assess sensitivity of such receptors to change to be low to medium with pedestrians likely to have medium sensitivity.



**Existing View from Thames Street on Western Pavement Looking North East (PH)**

- 6.74 The degree of change proposed would be medium to high in my view given the extent of Building A visible in this view and the views of Building B that would be revealed as you move north. I do not share the Appellant's view of the benefits of the scheme in terms of visual effect and I do not accept that any tall buildings can be seen in these views or in the kinetic journey along this part of Thames Street. I consider the overall visual impact to be **minor to moderate adverse**.



### Views from North

- 6.75 I first consider views from the north looking south and southeast these encompass some private views from dwellings, public views from the Clarence Street/ Church Street including Viewpoint 5, public views from Clarence Street/ Bridge Street (Viewpoint 7) and views from Staines Bridge/ The Hythe (Viewpoint 9).
- 6.76 On approaches toward the town centre along Clarence Street/ Thames Street travelling south existing buildings on the appeal site and buildings on surrounding sites (such as Tothill multistorey car park and the Elmsleigh centre) are not visible. The foreground building (the former Debenhams store) obscures views of the site and its surroundings. The existing viewpoint 5 confirms this impression which does not vary with movement east west along Clarence Street or north south along Church Street.



**Existing View from Clarence Street to the east of Viewpoint 5 (PH)**

- 6.77 In the above view whilst more of Thames Street is visible and the pedestrian access tower to Tothill multi storey can be seen none of the existing buildings at the appeal site can be seen. Church Street funnels southerly views along the street toward either the Debenhams building or Waterside.



**Existing View from Church Street to the north of Viewpoint 5 (PH)**

- 6.78 In my view the proposed buildings will be visible in both of these views as well as being experienced as part of the kinetic journey travelling southwards along Church Street and Clarence Street.



**Extract from Viewpoint 5 (TVA)**



- 6.79 In this view Block A is readily visible above the Debenhams building and the top of Block B is visible to the south of the parapet above the store entrance over the return roof fronting Thames Street. I suspect some of Block B will be visible to the left of the parapet when viewed east of the Viewpoint and further south along Church Street. Moving west along Clarence Street more of Block B and less of A will be visible.
- 6.80 What is notable about this viewpoint is the looming background presence of the Block A which towers above the Debenhams building, introducing a scale of development that will not have been encountered hitherto in the town centre on approaches from the north and Staines Bridge. The monolithic appearance of the building in this view adds to its prominence and impact in the view.
- 6.81 In the longer view at the junction of Bridge Street and Clarence Street taken on the pedestrian crossing looking directly down Clarence Street toward the town centre.
- 6.82 The existing view directs focus along Clarence Street toward the Debenhams building with a relatively uniform scale of buildings framing the street (albeit the clad scaffolding to the property being reroofed on the left of Clarence Street exaggerates the scale of that building as shown below).



**Existing View along Clarence Street Without Scaffolding (PH)**

- 6.83 The Proposed Viewpoint is extracted below with the scaffolding in place.



**Extract of Viewpoint 7 (TVA)**

- 6.84 The proposed view is directed along Clarence Street toward the Debenhams building where the clad scaffolding to the properties being reroofed in Clarence Street provides screening to part of the proposed buildings. What is clear from the existing viewpoint I have provided above is that a greater extent of the proposed Building B will be visible above Debenhams and the properties in Clarence Street than could be shown in the viewpoint<sup>7</sup>.
- 6.85 What is also clear is that a substantial proportion of Building A is also visible in this view with it visible above the extended five storey building at Swanside.
- 6.86 The long elevations of both building are visible in this elevation and there is very little gap between the silhouettes of the two buildings. In approaches along northern footpath travelling east the gap between the two buildings will close up and disappear. Presenting an elongated tall silhouette of tall built development looming over the buildings in Clarence Street.
- 6.87 The viewpoint is provided as a wire diagram and not a full render and as such the solidity and scale and appearance of the buildings cannot be appreciated in the viewpoint.

<sup>7</sup>

No criticism is intended as the scaffolding was in place at the time the imagery was prepared.

- 6.88 What is clear in this view is that the proposed buildings will be highly visible and dominant towering above the Debenhams building and other local buildings and that a substantial element of both buildings will be visible in the journey along Clarence Street.
- 6.89 Assuming each indentation relates to a storey on the building (i.e. it shows the balcony detail) I estimate that you can see seven storeys of Building B above the Debenhams building and six to seven storeys of Building A above Swanside.
- 6.90 The looming presence of such tall buildings in this context of low to medium rise streetscapes would be oppressive and dominant without context and any relationship to the prevailing scale of buildings. The proposed height of the buildings would dominate the experience intruding into the sky component of this view.
- 6.91 I recognise that the majority of receptors current experiencing views travelling are drivers of cars and commercial vehicles, cyclists and pedestrians crossing Clarence Road or travelling along it toward High Street. They are not predominately engaging in leisure pursuits but I do consider they would have an appreciation of the coherent scale of buildings in the view and how they address the roads and the focus would be toward the former Debenhams building. Therefore, I would assess sensitivity of such receptors to change to be low to medium with pedestrians likely to be medium sensitivity.
- 6.92 The degree of change proposed would be medium in my view given the extent of both buildings visible in these views. I do not share the Appellant's view of the benefits of the scheme in terms of visual effect and I do not accept that any tall buildings can be seen in these views or in the kinetic journey along this part of Clarence Street. I consider the overall visual impact to be **minor to moderate adverse**.

### Views from North West

- 6.93 Finally I turn to consider views from the west, encapsulated by Viewpoint 9.
- 6.94 I have acknowledged that from viewpoint 8 on the listed Staines Bridge the appeal scheme would be largely screened by existing foreground buildings, I accept that part of Building A would be visible between the apartment buildings that front the Thames, however it would not exceed the height of the neighbouring apartment building and the main focus of receptors would be on the bridge itself or the immediate Thames water environment.
- 6.95 Overall I agree with the Appellant's assessment but I would characterise the visual impact from viewpoint 8 as **negligible adverse** as opposed to neutral.
- 6.96 Viewpoint 9 is from road junction with The Hythe and in it both tall buildings would be visible protruding above buildings in the foreground as one moves east of west in the journey from here the gap between the two building would close and journeys east would result in a greater extent of Building A being visible to the south of Staines House. Pedestrians and cyclists are separated from the traffic and can cross on the north western side of the bridge which again opens up views of the two buildings as part of the kinetic experience.



**Extract of Viewpoint 9 (TVA)**

- 6.97 I accept that traffic is a dominant feature of any experience in viewpoint 9 and also in journeys crossing Staines Bridge and on the approach to it travelling north. However as illustrated in the viewpoint both proposed buildings break the skyline and protrude above the foreground buildings. In that respect I estimate that six storeys of Building A are visible above Staines House.





**Existing View from The Hythe toward the Appeal Site (PH)**

- 6.98 I also consider views of similar proportions of the two buildings would be achieved from The Hythe itself on the approach to the riverside path or The Swan Public House or the conservation area as one leaves the roadside environment as from viewpoint 9. This view is achieved from the pavement on both sides of the road as well as from the pavement and cycle path on the approach travelling north toward and across the junction of The Hythe with the roundabout and gyratory junction. Users of this part of the footpath network include recreational walkers as well as residents of the area who are more susceptible to change than workers and passengers in vehicles.
- 6.99 The degree of change proposed would be medium in my view given the extent of both buildings visible in these views. I do not share the Appellant's view of the benefits of the scheme in terms of visual effect and I do not accept that any tall buildings can be seen in these views or in the kinetic journey along this part of the Hythe east of viewpoint 9. I consider the overall visual impact to be **minor adverse**.

## **Conclusion**

- 6.100 I have shown with reference to Viewpoints 1, 2, 3, 5, 7 and 9 that the proposed development would present a dominant form of development that fails to relate successfully to its context, looms over existing buildings, breaking the skyline and it fails to make a positive contribution to the area. I have shown that it is out of character with the surrounding area and leads to harm to the character and appearance of the area.
- 6.101 I therefore consider that the proposal would conflict with the provisions of Policy EN1 of the Spelthorne Core Strategy and Policies Development Plan Document 2009 insofar as it does not comprise a high standard of design and respect and make a positive contribution to the relevant streetscene and character of the area. In particular it will not pay due regard to the scale and height of adjoining buildings and the context within which the development will be experienced.
- 6.102 As such, I consider the proposed development to also conflict with the NPPF 2021 and in particular section 12 as it would not comprise good design given it will not add to the overall quality of the area or be sympathetic to local character and context. In the context of making effective use of land I consider the proposal to fail to protect the environment and to be an example of maximisation as opposed to optimisation. It would also fail to have proper regard to context in conflict with the National Design Guide insofar as the proposed scale of development does not identify with the local context.



## Car Parking

### The Requirement

- 6.103 As I have shown earlier applying the adopted Spelthorne Car Parking Standards SPG (which are the applicable standards applied by Spelthorne Borough Council pursuant to Policy CC3), to the proposed development requires between 1.0 and 1.5 spaces per dwelling proposed. Therefore, the adopted SPG standards would require, in the first instance, the provision of a minimum of 260 spaces for this scheme<sup>8</sup>.
- 6.104 The proposal is for 206 new dwellings with just 48 car parking spaces provided at the site. The proposed 48 on site car parking spaces equate to 0.23 space per dwelling.
- 6.105 Therefore, the proposed provision equates to just 18% of the Borough Council minimum SPG requirement, a shortfall of 212 car parking spaces.
- 6.106 If the Appellant reduces the quantum of Affordable Housing from 46% as offered at application stage to 30% as I understand they may be proposing then that would increase the number of car parking spaces by 0.25 of a space per unit that changes from affordable to market housing<sup>9</sup>.
- 6.107 As I understand matters 95 dwellings were initially proposed as affordable units. A reduction to 30% would result in the proposals including 62 affordable units an increase of 33 open market dwellings. That would increase the requirement by another 8 spaces. Therefore, should the tenure of housing be amended as per my understanding it would increase the requirement on the basis of the Council's SPG requirement to 268 spaces.
- 6.108 The Surrey County Council car parking standards would require 1 space per dwelling in this location, resulting in a requirement in the first instance for the provision of a maximum of 206 spaces for this proposed development.
- 6.109 48 on site spaces represent 23% of the County Council car parking maximum standard, a shortfall of 158 car parking spaces on that requirement.
- 6.110 Regardless of which car parking standard is applied the Appellant has shown that the closest residential roads (located to the south of the appeal site) cannot accommodate any meaningful level of overspill parking demand from the appeal site<sup>10</sup>.

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<sup>8</sup> Based on the mix of dwelling sized and tenures proposed in the application as determined

<sup>9</sup> The requirement for one bed units is 1 space per affordable unit and 1.25 per market unit and for two bedroom units it is 1.25 space per affordable unit and 1.5 per market unit

<sup>10</sup> Technical Note on Car Parking Availability (PJA March 2021) at [CD1.29](#)

- 6.111 In my view the consequence of such a degree of underprovision would be cars from the site would either displace existing residents' cars from the residential roads within 10 minutes' walk of the appeal site, lead to parking pressures in the town centre or lead to parking pressure elsewhere.

*Flexible application of the requirement*

- 6.112 I support the flexible application of standards whether they are expressed as minimum or maximum standards. However, it is important that any flexibility is supported by evidence to show that the result of relaxing standards will not lead to other planning or amenity consequences.

*Car ownership*

- 6.113 In that context I am mindful of the census data<sup>11</sup> that shows in the Staines ward there are 1333 one- or two-bedroom apartments<sup>12</sup>. Crude car ownership levels amongst these one-to-two-bedroom apartments, without regard to tenure amounts to a total of 990 vehicles.
- 6.114 Therefore, crude car ownership equates to 0.743 per one- or two-bedroom apartment in the Staines ward.
- 6.115 Applying this car ownership level to the proposals, which comprise 206 one- and two-bedroom apartments, would result in a car parking requirement of 153 spaces. Therefore, the proposed provision of 48 spaces would fall 105 spaces short of the census car ownership levels in the ward.
- 6.116 Breaking the census data down further 352 apartments in the ward are owned. Owners/ occupiers of these apartments own 339 cars. Therefore, in owned apartments the ownership ratio is 0.963 cars per one or two bed apartment. Therefore, the proposed 112 owned apartments would require 108 car parking spaces to accommodate cars associated with these flats.
- 6.117 The ratio of car ownership amongst shared ownership and rented tenure one- and two-bedroom apartments is lower at 0.664 car per apartment<sup>13</sup>. Therefore, 94 rented or shared ownership apartments would require 63 car parking spaces to accommodate cars associated with these flats.
- 6.118 Therefore the total number of cars owned by the occupiers of 206 flats in the tenure mix proposed in the application the subject of this appeal based on census data for Staines town ward would be 171 car parking spaces.

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<sup>11</sup> See the extract from Table CT0103\_2011 for Staines ward at **Appendix 3**

<sup>12</sup> For these purposes 1 – 4 rooms are defined as one- or two-bedroom apartments, flats, or maisonettes.

<sup>13</sup> i.e., 651 cars divided by 981 apartments

- 6.119 It is therefore worth noting that adjustments to tenure mix will influence the ratio of car ownership given owned apartments yield higher car ownership ratios than shared ownership or rented apartments. Any adjustments to the tenure mix to increase the proportion of owned apartments could result in greater number of cars associated with the appeal site.
- 6.120 I set out below in Table One the car parking “requirement” arising from the various approaches I have outlined above with the shortfall that the proposed provision of 48 spaces represents.

	<b>SBC Standards</b>	<b>SCC Requirement</b>	<b>Census with tenure split</b>	<b>Census all apartments</b>
206 apartments	260	206	171	153
<b>Shortfall</b>	<b>-212</b>	<b>-158</b>	<b>-123</b>	<b>-105</b>

**Table 1 – Car Parking “requirements” and Shortfall of Provision**

- 6.121 I note the Appellant asserts that a lower car ownership figure could be derived from the census data. In their Parking Note they state<sup>14</sup> that:

*“[...] an average of 23% of private one/two-bedroom flats and 49% of affordable one/two-bedroom flats do not own a car. Based solely on this, 72 flats would not own a car, while 134 would own a car.”*

- 6.122 I have set out my understanding of the census data and the number of cars that would be generated by a development of 206 apartments in the Table above. I have shown that the car ownership level is higher than the level relied on by the applicant. I think some of the difference between us relates to the Applicant’s approach which does not appear to account for the position where an apartment may own more than one car and we come to different conclusions on the number of apartments with no cars<sup>15</sup>.
- 6.123 The applicant’s approach is that by underproviding car parking spaces the development will only attract residents who do not need car parking spaces and therefore the development can be expected to have lower average car ownership than the census reveals<sup>16</sup>.

<sup>14</sup> Paragraph 2.1.1 of the Applicant’s Technical Note: Response to Car Parking Comments by PJA at [CD1.31](#)

<sup>15</sup> The number of apartments within the 352 one – four room owned apartments with no car is 67 or 19% and the equivalent for the 981 rented or shared ownership apartments is 425 or 43.3%

<sup>16</sup> Paragraph 2.1.2 of the Applicant’s Technical Note: Response to Car Parking Comments by PJA at [CD1.31](#)

- 6.124 The Applicant also justifies reduced levels of provision by reference to TfL documentation and international studies. It is trite to say but the TfL study obviously refers to London and the circumstances of lower provision of car parking equating to lower car ownership levels. The applicant also relies on a Norwegian and American study to support this proposition.
- 6.125 The Applicant seeks to reduce further the census car ownership levels by reference to DVLA car registration information. They note that DVLA car registrations in Staines town centre have seen a reduction per capita over the 10-year period 2011 – 2021 of 8 – 9 %.
- 6.126 I have no reason to dispute that figure insofar as it relates to cars being registered, but I do not accept that it results in a materially different result. For instance, if applied to owned apartments a reduction of 8% in cars owned would lower the total from 339 to 312 cars. Those 27 cars could be accounted for in the reduction from 2 car households to 1 car households and not any increase in non-car owning households. Moreover, the increase in cars not registered in the Staines town centre ward could be accounted for by other factors<sup>17</sup>.
- 6.127 However, if we crudely reduced the level of car ownership arising from my census figures that would equate to a shortfall of between 93 – 110 spaces as shown in Table 2 below.

	<b>Census with tenure split</b>	<b>Census all apartments</b>
206 apartments	158	141
<b>Shortfall</b>	<b>-110</b>	<b>-93</b>

**Table 2 – Car Parking “requirements” and Shortfall of Provision with a Downward Adjustment of 8%**

*Impact of any change to tenure mix / AH offer on car ownership*

- 6.128 I also understand the Appellant to be reconsidering the tenure mix and I have seen correspondence indicating that they maybe proposing to reduce the proportion of affordable housing units to 30% of the total. That would change the balance of the units to 144 owned apartments and 62 rented or shared ownership units.
- 6.129 On that basis I set out below the comparison figures for the Census with the tenure Split requirement having regard to the 2011 census return and the 2011 Census with 8% reduction in car ownership.

<sup>17</sup> Such as an increase in car lease or company car ownership where the vehicle is registered to the owner who is not the resident of the apartment.

	Census with tenure split at 46% Affordable Housing	Census with tenure split at 30% Affordable Housing
206 apartments	171	180
Cars Per dwelling	0.83	0.87
Shortfall	-123	-132
8% reduction in car ownership	158	166
Cars Per dwelling	0.77	0.81
Shortfall	-110	-118

**Table 3 – Car ownership census 2011 adjusted for DVLA Data and Potential Tenure Mix adjustment**

- 6.130 What is clear is that on either basis the shortfall of car parking provision on either tenure split is substantial with in excess of 100 cars not accommodated at the appeal site in any of the scenarios.
- 6.131 The proposed ratio of car parking spaces to dwellings at 0.23 falls well short of even the most favourable of adjusted scenarios above
- 6.132 The reference to Figure 1 of the Appellant's Technical Note (which I understand to derive from extracted information from the TRICS database) merely demonstrates that in circumstances where less than one space per dwelling was provided on sites then demand did not equate to provision on site. What is not possible to understand from Figure 1 is what level of parking below 1 space was provided and whether it is as low as 0.23 per dwelling?
- 6.133 In my view the disparity between known behaviour and known car ownership patterns in the ward and the level of proposed provision will displace car parking beyond the appeal site (which cannot accommodate any greater number of cars).

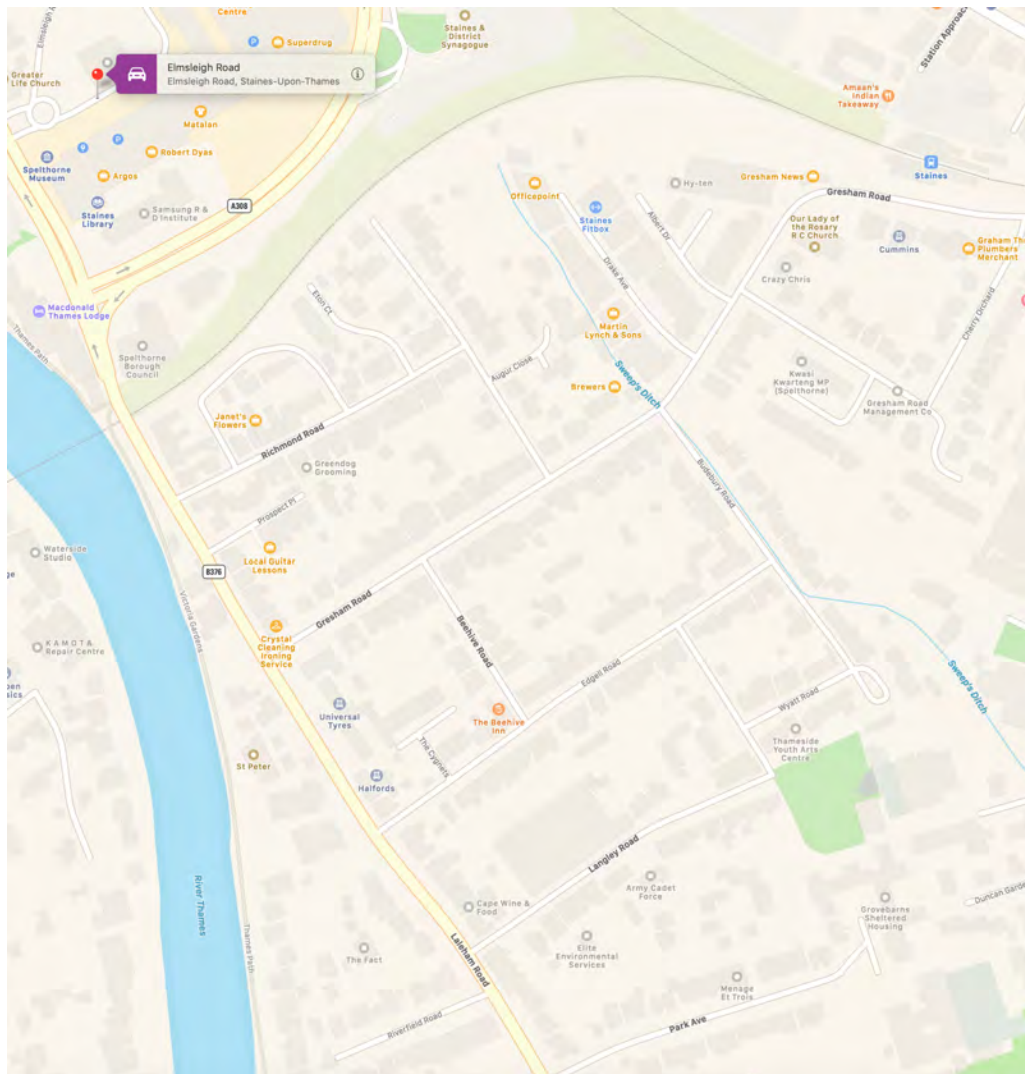
*Appellant's reliance on car usage*

- 6.134 The Applicant then discussed minimising car usage and sets out in Figure 2 the impact of car parking on car trips. Given the applicant is proposing 0.23 spaces per apartment I am not clear how this Figure assists the decision maker's understanding of behaviour in such circumstances.
- 6.135 I welcome the measures proposed such as the car club (which provides 2 cars for the 206 apartments proposed) but note for instance that the two car club vehicles equate to one car for every 103 apartments or 0.97%.



## Availability of On Street Car Parking

- 6.136 It is common ground between the parties that cars displaced from the site will look to the residential roads to the south of the appeal site to meet needs arising. The Appellant notes the Lambeth methodology looks at spaces within a 2-minute walk of the site. I concur with the Appellant that there are no available restricted or unrestricted car parking spaces within a 2 minute walk of the appeal site.
- 6.137 I therefore agree that it is reasonable to apply a ten minute walking catchment area to reasonably project where displaced cars from the appeal site will search for spaces.



**Residential Roads within a 10 minute walk south of the appeal site**

- 6.138 In my view that would lead to cars searching the residential roads south of the junction of Thames Street and South Street for spaces. The extract plan below shows the residential roads within 10 minutes of the appeal site.

6.139 I do not include Laleham Road in my assessment of available on street car parking as during daytime hours parking is restricted by yellow lines and outside these times the volume and speed of traffic combined with the restricted width of the road north of Gresham Road and the on street restrictions deter use of the road for parking<sup>18</sup>.

6.140 The residential roads comprise:

- Richmond Road
- Richmond Crescent
- Eton Court
- Augur Close
- Prospect Place
- Gresham Road (part of)
- Beehive Road
- Budebury Road
- Edgell Road
- Langley Road (part of)
- The Cygnets
- St Peter's Close

6.141 The following residential roads fall outside a ten minute walk of the appeal site and I come back them later:

- Langley Road (part of)
- Wyatt Road
- Cherry Orchard
- Gresham Road (part of)

6.142 With regard to the residential roads within a ten minute walk of the appeal site it is first relevant to note that Richmond Crescent, The Cygnets and St Peter's Close, are all private roads and thus do not have publicly available car parking spaces available at any time. Prospect Place is subject to seven day permit parking between 0800 – 1830 hours and I have not counted this in my daytime assessment. Therefore, the available roads within a 10 minute walk are:

- Richmond Road
- Eton Court
- Augur Close
- Gresham Road (part of)
- Beehive Road
- Budebury Road
- Edgell Road
- Langley Road (part of)

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<sup>18</sup>

Except for the 5 parking bays located between the junctions with Edgell Road and Langley Road

### Daytime Availability of On Street Parking Spaces

6.143 Whereas the surveys conducted by both parties focus on evening/ night-time I have set out my own observations of the daytime situation. I have visited this group of roads on three weekday occasions during normal office hours and my impression was of roads that had few available car parking spaces and featured significant levels of on street parking. One visit was in the morning between 1100 – 1200, another between 1330 – 1430 hours and the final one between 1600 – 1700. In my experience one would be extremely lucky to find available legal car parking spaces in the surrounding residential streets. I discuss each of the roads below:

#### Richmond Road (East West Limb)

6.144 The road is fronted by numerous dwellings and features double yellow restrictions around junctions and single yellow restrictions which alternates along one side of the road. The road is relatively narrow and can only accommodate one side of parked vehicles and one way traffic flows.



**Daytime Car Parking in Richmond Road (PH)**

6.145 Of the available spaces none were vacant at the times I visited although one space was vacated and then re occupied at the last visit I undertook<sup>19</sup>.

6.146 I estimate there to be approximately 23 on street car parking spaces available depending on how drivers park their vehicles<sup>20</sup>.

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<sup>19</sup> At approximately 1415 on 14 October 2021

<sup>20</sup> On two occasions capacity was reduced to 21 by careless parking

- 6.147 I also consider that 24 houses in this part of Richmond Road do not have access to off street car parking.
- 6.148 On one of my visits two cars were illegally parked on this part of Richmond Road one blocking a crossover and partially on double yellow lines (outside 49 Richmond Road) and the other on the double yellow lines close to the junction with Laleham Road outside the flank of 7 Bankside. On another visit a car was parked on the double yellow lines outside the flank of 7 Bankside.

Richmond Road (North South limb)

- 6.149 The northern part of the road comprises a narrow stretch of road comprising a close. There are vehicular accesses from private driveways onto the road which restrict availability in terms of both kerbside space and manoeuvrability given the narrowness of the carriageway.



**Daytime Car Parking in Richmond Road**

- 6.150 Double yellow lines exist at junctions and further south single yellow lines exist particularly opposite the junction with Augur Close (restrictions 0830 – 1700).
- 6.151 I estimate that there are ten on street car parking spaces within the road and of them two were available on 2 daytime visits and one was available on 1 daytime visit.
- 6.152 I also consider that 2 houses in this part of Richmond Road do not have access to off street car parking.

Eton Court

- 6.153 Eton Court comprises a winding estate road with some available on street parking restricted by carriageway alignment, crossovers and yellow lines (0830 – 1700).
- 6.154 I estimate there to be 9 on street car parking spaces of which 3 were available on each of my visits.
- 6.155 I understand that all houses have dedicated off street parking provision.

Augur Close

- 6.156 Augur Close comprises an estate road with some available on street parking restricted by carriageway alignment access to garages and double yellow lines.
- 6.157 I estimate there to be 8 on street car parking spaces of which all were taken on 2 occasions and one available on the other.
- 6.158 I understand that all houses have off street parking provision.

Gresham Road (from Laleham Road to Budebury Road)

- 6.159 The road is fronted by numerous dwellings and features double yellow restrictions around junctions and is a well trafficked road providing access from Laleham Road, small industrial and trade counter sites on to the railway station and beyond. The road is relatively narrow and can only accommodate one side of parked vehicles and frequently features queuing traffic and one way traffic flows.
- 6.160 Of the available spaces none were vacant at the times I visited.
- 6.161 I estimate there to be approximately 14 on street car parking spaces available of which one comprised a disabled persons car parking bay.
- 6.162 I also consider that 10 houses in this part of Richmond Road do not have access to off street car parking and some of the forecourt parking provided for houses was very restricted in depth.
- 6.163 One car was illegally parked blocking a crossover.





**Daytime Car Parking in Gresham Road © Google Street View**

Budebury Road

- 6.164 I consider only half of Budebury Road to fall within a 10 minute walk of the appeal site, however I have surveyed the entire length of the road on my visits.
- 6.165 Along the full length of the road I consider there to be 15 available on street spaces. Of these two are designated disabled persons car parking bays.
- 6.166 Of the 15 available spaces 3, 4 and 4 were vacant at the times I visited.

6.167 I also consider that 6 houses do not have access to off street car parking.

#### Beehive Road

6.168 The road is fronted by numerous dwellings and has a public house at its southern junction with Edgell Road and features double yellow restrictions around junctions. The road is relatively narrow and can only accommodate one side of parked vehicles and one way traffic flows.



**Daytime Car Parking in Beehive Road (PH)**

6.169 Of the available spaces none were vacant at the times I visited.

6.170 I estimate there to be 15 on street car parking spaces available.

6.171 I also consider that 4 houses in Beehive Road do not have access to off street car parking and I note the public house does not have a car park.

#### Edgell Road

6.172 The road is fronted by numerous dwellings and has a public house and shops along its length. It features double yellow restrictions around junctions. The road is relatively narrow and can only accommodate one side of parked vehicles and one way traffic flows.



**Daytime Car Parking in Edgell Road (PH)**

- 6.173 Of the available spaces none were vacant at the times I visited although one car left a space on two occasions and that space was immediately re occupied on one occasion.
- 6.174 I estimate there to be approximately 52 on street car parking spaces available depending on how drivers park their vehicles.
- 6.175 I also consider the majority of houses in this road not to benefit from access to off street parking (45 houses).

Langley Road

- 6.176 The western half of the road closest to Laleham Road falls within the 10 minute walk distance of the appeal site but I have counted the whole road.
- 6.177 The road is fronted by numerous dwellings, industrial units and has The Thameside Centre at its eastern junction with Wyatt Road and features double yellow restrictions around junctions. The road is relatively narrow and can only accommodate one side of parked vehicles and one way traffic flows.





**Daytime Car Parking in Langley Road (PH)**

6.178 I estimate there to be 20 on street car parking spaces available. Of the available spaces none were vacant at the times I visited.

6.179 I also consider that 12 houses do not have access to off street car parking.



**Daytime Car Parking Around the Thameside Centre in Langley Road (PH)**

6.180 Unlawful parking takes place with two cars blocking accesses and I note the Thameside centre attracts up to 7 cars parked half on the pavement such that they block the pavements and restrict the available width of the carriageway.

### Overall Conclusion

- 6.181 My overall conclusion is that these residential roads are heavily parked during daytime office hours with little available capacity. Some thoughtless car parking restricted capacity in the roads and illegal parking was notable across driveway crossovers and on yellow lines.
- 6.182 I do not consider there to be any practical available daytime on street capacity for cars displaced from the appeal site. On the basis of my analysis<sup>21</sup> of likely car ownership levels derived from census data over 100 cars who would not be able to park on-site would be left looking to park in these nearby streets.

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<sup>21</sup>

See Table 3



### Night time Availability of On Street Parking Spaces

- 6.183 The Appellant has undertaken a night time survey that complies with the Lambeth methodology. I understand the available spaces are counted between 0030 and 0530 hours on two weekday nights.
- 6.184 The Appellant notes the existing on street parking restrictions and notes that these would make use of the restricted spaces (i.e. single yellow lines) unattractive to any residents at the proposed development<sup>22</sup>. It is noted that generally the yellow lines in Laleham Road, Gresham Road, Richmond Road are effective at controlling on street parking. This chimes with my experience and I note carriageway width and traffic levels in Gresham Road in particular would deter on street parking on areas of yellow line restrictions. I also consider that whilst restrictions on a number of the single yellow lines cease given parking on the opposing side of the road (such as in Richmond Road) it is simply not possible to park on the yellow line without blocking the road to traffic.
- 6.185 The survey also reveals that Edgell Road, Langley Road, Budebury Road, Wyatt Road and Beehive Road all allow unrestricted parking and are subject to very high parking levels with vehicles actually exceeding available spaces.

Road	No. Cars Parked <sup>23</sup>	Overnight Capacity	Percentage Occupation
Richmond Road <sup>24</sup>	38	49	77.5%
Eton Court <sup>25</sup>	10	13	76.9%
Augur Close	8	Not available	-
Gresham Road (part of) <sup>26</sup>	20	15	133%
Beehive Road <sup>27</sup>	15	15	100%
Budebury Road <sup>28</sup>	29	26	111.5%
Edgell Road <sup>29</sup>	57	51	111.8%
Langley Road <sup>30</sup>	32	22	145%
<b>Total</b>	<b>201</b>	<b>191</b>	<b>105.2%</b>

**Table 4 – No Cars Parked Overnight in Residential Roads**

- <sup>22</sup> See 2.1.4 of the Car Parking Availability Technical Note by PJA dated 10/03/2021 at [CD1.29](#)
- <sup>23</sup> Where there is a different figure in the Appellant's two surveys I have used the higher figure
- <sup>24</sup> My capacity figure is lower than the Appellant's because I do not count any additional spaces other than unrestricted on the east west limb and only 10 more on the north south limb in total
- <sup>25</sup> Allowing for cars to be able to travel along the carriageway capacity unrestricted + restricted is 13.
- <sup>26</sup> I estimate capacity on the relevant part of Gresham Road to be 15 as per **Appendix 4**
- <sup>27</sup> I estimate capacity to be one more than the Appellant
- <sup>28</sup> Overnight survey and capacity figure relates to full length of road
- <sup>29</sup> I estimate capacity to be 51 as per **Appendix 4**
- <sup>30</sup> Overnight survey and capacity figure relates to full length of road

- 6.186 In terms of the roads I have identified I note the Appellant's overnight surveys reveals the percentage capacity as shown in Table 4 above.
- 6.187 As reported by the Appellant there is effectively no availability in residential roads overnight, this indicates to me that the residential roads are required to provide for the needs of the residents of those roads and do not contain any material capacity that could accommodate overspill from the appeal site without leading to other consequences.
- 6.188 I understand from the Appellant's survey that the majority of available overnight car parking is located more than a 10 minute walk from the appeal site<sup>31</sup>. I agree that appears to be the case and chimes with my experiences of visiting the area. However, where I disagree with the Appellant is that such unavailability will lead to overspill car parking from the appeal site not occurring in these streets as it would dissuade all future residents without access to on site car parking from car ownership. In my view it would lead to greater pressure on the limited spaces available in these streets with the potential for conflict and displacement of residents of the residential streets and/ or unlawful or inconsiderate parking.

#### Late Afternoon and Evening Availability of On Street Parking Spaces

- 6.189 The Council commissioned an evening survey to understand availability of spaces at the times a household could be returning to their dwelling by car to try and find a car parking space (as opposed to the middle of the night time).
- 6.190 The survey was undertaken on Monday 11 October at 1700, 1900 and 2100 hours. A copy of the survey is attached at **Appendix 4**.
- 6.191 In Richmond Road whilst theoretically there are a number of single yellow space available outside the restricted hours (0830 – 1700) the width of the carriageway means parking in these spaces opposite the unrestricted spaces would block the road completely to vehicular traffic. In the survey area the level of on street parking remains relatively constant across the three survey times. I interpret this to mean that the cars parked in these roads are usually associated with residents parking as opposed to parking associated with the town centre.
- 6.192 I set out below in my table the percentage of available spaces occupied at the times in each road

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3.1.4 of the Technical Note

	<b>capacity</b>	<b>1700</b>	<b>1900</b>	<b>2100</b>
Gresham Road	15	17	17	19
Richmond Road	39 <sup>32</sup>	34	33	34
Eton Court	13	11	9	10
Augur Close	8	5	7	7
Budebury Road	5	8	8	9
Edgell Road	51	51	46	43
Beehive Road	15	14	15	15
Langley Road	17	15	13	13
<b>Total</b>	<b>163</b>	<b>155</b>	<b>148</b>	<b>150</b>
<b>% capacity</b>		<b>95.1%</b>	<b>90.8%</b>	<b>92%</b>
<b>Available Spaces</b>		<b>8</b>	<b>15</b>	<b>13</b>

**Table 5 – Available Spaces in the Evening**

6.193 The table reveals the very high degree of take up of on-street spaces at times when residents would be expected to return and be looking for spaces. It is clear that the residential streets do not have spare capacity to accommodate the displaced cars from the appeal site.

Conclusion on Car Parking Availability and Likely Demand

6.194 The adjusted census data represents the best case scenario and reveals a likely shortfall of car parking spaces provided to service the development of around 100 spaces.

6.195 The residential roads in the vicinity of the appeal site have little capacity for accommodating these cars without displacing existing residents from their roads.

6.196 In that respect during daytime the roads are heavily parked with little available capacity and would be unable to accommodate the numbers of cars displaced from the appeal site.

6.197 In the evening when occupiers are likely to be returning to their homes the roads to the south of the appeal site have an available capacity of just 8 spaces at 1700 hours and 13 at 2100 hours. That equates to just 6.8% of the displaced spaces required on the basis of the adjusted census data for 30% affordable housing provision.

6.198 Overnight the Appellant's survey reveals a paucity of available and useable on-street parking to meet demand arising from the appeal site.

<sup>32</sup>

On street single yellow line spaces severely limited due to width of the carriageway and thus discounted from capacity figure

What are the Consequence of the Proposal Given Existing Demand?

- 6.199 There are two potential consequences of the substantial underprovision of car parking at the appeal site either parking pressure on town centre streets and facilities or parking stress and pressure on unrestricted residential streets. I do not consider it realistic to expect that town centre roads and facilities would accommodate the substantial overspill from the appeal site given existing restrictions and traffic flows along town centre streets<sup>33</sup>.
- 6.200 Therefore the 100 + overflow cars generated by the appeal site will be displaced onto residential roads with limited restrictions and will add to pressure on available spaces in those roads.
- 6.201 In my view the focus of any search will be the residential roads south of the appeal site. I have shown above those roads are already subject to significant parking pressure with very high levels of on street parking and substantial number of the houses in the roads not benefitting from off street parking.
- 6.202 As can be seen existing capacity is very limited at all times of day and night and the addition of such a number of additional vehicles searching for car parking space. The result of this will be either:
- a) Conflict over available on street spaces
  - b) Displacement of existing residents of residential roads to roads further away due to parking by others
  - c) Increased unlawful and thoughtless parking
- 6.203 Therefore existing residents of Richmond Road, Eton Court, Augur Close, Gresham Road, Beehive Road, Budebury Road, Edgell Road and Langley Road will experience parking stress associated with their daily routines with greater demand for the limited on street car parking in their roads.
- 6.204 Whilst I welcome the proposed mitigating features such as the travel plan, the single years funding for the 2 vehicles comprising the car club and cycle parking provision I do not consider that they are proportionate to, or will sufficiently overcome, the substantial deficiency in car parking provision.
- 6.205 I have shown that the proposals will not make appropriate provision for off street parking to accord with the Council's SPG, the County Council's standards or the car ownership levels for similar properties in the ward. The proposals would therefore fail to meet the anticipated demand for parking associated with the development of 206 apartments, does not include measures sufficient

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<sup>33</sup> Thames Street and South Street are dualled and subject to double yellow line restrictions, High Street is a pedestrian zone and all other town centre roads have double yellow line restrictions.

to offset the substantial unmet need for car parking spaces. As such, the proposals will conflict with Policy CC3 of the adopted Core Strategy

- 6.206 The parking stress emanating from the displacement of cars from the appeal site onto surrounding residential roads will adversely impact on the amenity of occupiers of these residential roads to the detriment of their amenity. I also consider the consequences for future residents of the proposed development to be unsatisfactory given the difficulties that would be encountered finding satisfactory car parking as a consequence of the shortfall in provision at the appeal site. Such consequences would adversely impinge on the living conditions for those future residents.
- 6.207 As such, I do not consider the proposals to represent a high standard of design and rather that encouraging sustainable means of travel it seeks to impose and force such behaviours on future residents contrary to Policy EN1 of the Core Strategy.
- 6.208 Whilst the Council supports the flexible application of standards the level of car ownership in the area results in the need for significantly greater provision than 0.23 spaces per dwelling and the Appellant has failed to demonstrate that the impacts of providing insufficient car parking with the proposed development can satisfactorily be accommodated within the area. I note that the proposed car parking ratio is significantly less than that provided on other permitted schemes in Staines.
- 6.209 In that respect I am aware of the permissions granted on sites north of the town centre such as the redevelopment of the former Majestic House site which is now branded Charter Square. Phases 1A and 1B of Charter Place permitted combined to provide 364 apartments with a total of 245 car parking spaces to serve both phases<sup>34</sup>. That equates to 0.673 spaces per dwelling, which is nearly three times that proposed at the appeal site.
- 6.210 The site at 15 – 51 London Road (the former Centrica site) has extant permission for the erection of 467 apartments in a range of buildings from 10 – 14 storeys in height<sup>35</sup>. That development provides 346 car parking spaces which equates to a ratio of 0.741 per dwelling. That is 3.2 times the ratio of spaces to dwellings proposed to be provided at the appeal site.
- 6.211 I note the Appellant also relies on an appeal relating to the variation of conditions relating to the redevelopment of a site at High Street, Yiewsley in the London Borough of Hillingdon. The site was in existing use as a Morrisons food supermarket and permission had been granted to redevelop the site as a replacement foodstore and 144 residential units in buildings ranging from 4 – 8 storeys.

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<sup>34</sup> Reference 17/01923/FUL, see [CD10.1](#)

<sup>35</sup> Reference 19/00290/FUL, see [CD10.3](#)



- 6.212 I note that scheme did not propose to reduce the number of on-site car parking spaces associated with the food store (DL11) but proposed to reduce the car parking spaces provided to serve the residential units from 101 to 23 spaces. The Inspector considered the emerging London Plan parking standards where the requirement would be a maximum of 0.5 spaces per dwelling and noted that there was common ground that there was no conflict with these standards (DL12). The Inspector identifies that 41% of all household residing in flats in the Yiewsley ward had no access to a vehicle (DL14).
- 6.213 This differs from Staines ward where only 19% of households in owned apartments have no access to a car<sup>36</sup>. Overall 36.9% of apartments in the Staines ward do not have access to a vehicle. However, of the 1333 apartments in the Staines ward the minority, 26.4%, are owned or mortgaged.
- 6.214 Therefore, having regard to the ward profile any increase in the proportion of owned or mortgaged properties will reduce the overall proportion of households without access to a vehicle. In the scenario where the proposal amends the balance of tenure to 70% owned or mortgaged properties then the overall profile for the appeal site would be 26% of households without access to a vehicle<sup>37</sup>.
- 6.215 Therefore, the ratio of households without access to a vehicle is much lower in Staines Ward than in Yiewsley.
- 6.216 I also note that the shortfall on the maximum car parking standard was a maximum of 49 spaces compared to the shortfall between the proposal and the Spelthorne maximum standards is 220 spaces<sup>38</sup>.
- 6.217 I cannot comment on the prevailing conditions in surrounding roads in Yiewsley but note the existence of controlled parking zones around that site was a material factor. I have set out the position on residential roads around the appeal site.
- 6.218 I also note that the public transport access at Yiewsley was noted to include mainline and underground (Central Line) access at West Drayton Station 200 metres from the appeal site with Crossrail due to open imminently. That compares to Staines railway station which is located 1 kilometre walk from the appeal site<sup>39</sup> and includes a more restricted range of options than Yiewsley.
- 6.219 Therefore, whilst I can appreciate the general principles identified by the Inspector I consider the circumstances in Yiewsley and Staines are different.

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<sup>36</sup> Of the 352 owned apartments 67 do not have access to a vehicle

<sup>37</sup> Where the ratio for 70% of the units (i.e. the owned proportion) would be 19% with no access to a vehicle and in the remaining 30% (shared ownership or rented) it would be 43.3%.

<sup>38</sup> Based on the amended tenure mix

<sup>39</sup> i.e. via Elmsleigh Road, Thames Street, Laleham Road and Gresham Road (or Richmond Road and Gresham Road)

### **Infrastructure, Section 106 Matters and Conditions**

- 6.220 I understand it to be common ground between the parties that infrastructure would need to be delivered to make the development acceptable and the Council has produced a CIL Compliance Statement to demonstrate that the proposed contributions comprise necessary infrastructure. I also understand that a section 106 document will be provided that will satisfy these requirements alongside CIL contributions.
- 6.221 The failure to secure necessary infrastructure and affordable housing contributions will necessitate the refusal of planning permission in accordance with policies SP2, SP5, CO2, CO3 and HO3 of the Spelthorne Core Strategy and Policies Development Plan Document 2009.
- 6.222 The Council has produced a schedule of conditions associated with the committee report at CD3.1. These conditions were formulated together with and agreed with the Appellant. At this stage there are no proposed changes to the list.

## **7 Planning Balance**

- 7.1 I acknowledge that the provision of housing in an area without a five year housing land supply is a benefit of the scheme that should be accorded significant weight.
- 7.2 I also note that the provision of 94 affordable dwellings (46%) would comprise policy compliant provision that should be afforded substantial weight in the context of the Council's performance in delivering affordable housing.
- 7.3 If proportion of Affordable Housing reduces then it is logical that the weight to be given to the benefit should be revisited. In that respect should the Appellant be proposing a reduction of 33 affordable units from 94 to 61 it would reduce the weight to be given to the benefit. It is worth noting that the proposal is to reduce the quantum of affordable units by 35%. I therefore consider it necessary to reduce the weight to be given to the proposed affordable housing in the circumstances that such a substantial reduction is proposed.
- 7.4 However the counterweighing factor is the Council's five year supply position as well as the position in respect of the delivery of affordable housing. Therefore, rather than reducing the weight to the benefit to moderate I consider it reasonable to attribute moderate to significant weight should the provision of 29.6% affordable housing now be proposed.
- 7.5 I note the Appellant considered that significant weight should be given to the delivery of 206 dwellings that included 46% affordable housing. In that context any reduction in affordable units if proposed would not, in my view, lead to the need to adjust that overall weighting.
- 7.6 Set against these undoubted benefits it is clear that the community are not supportive of the tall buildings proposed on the appeal site and I have demonstrated that they will comprise a form of development that does not relate well to context and leads to harm to the character and appearance of the area.
- 7.7 Whilst I accept the proposed amenity provision is not a reason to resist the proposed development I do not consider such provision at the foot of two tall towers circled by roads, set between the rear end of a shopping centre, a vehicular ramp, the rear servicing area of premises on High Street and a multi-storey car park comprises the high quality amenity space or outlook for future residents that the Appellant claims to comprise a benefit.
- 7.8 I have also highlighted the tensions that will arise from displaced car parking and its impact on the existing community particularly in residential roads south of the appeal site.

- 7.9 Whilst it is fair to record that the route to the development from Thames Street will include the removal of the roundabout and some degree of rationalisation of the highway arrangements and a reduction in hardstanding, it still represents an environment dominated by hardstanding and servicing infrastructure. The greening is modest but welcome, however I do not share the optimism about any widespread use of the site as part of a route to access High Street. I consider most pedestrians would choose to pass along Thames Street as opposed to crossing Elmsleigh Road and then walking alongside an ascending vehicular ramp before passing under it to cross Elmsleigh Road again into either a car park area or service area at the rear of High Street before accessing a narrow gap between buildings onto High Street.
- 7.10 My understanding is that the £70,000.00 contribution to improve and maintain children's play equipment at Lammas Park is a necessary contribution to meet the needs of children at the appeal site and reflects the increased use the park will be subject to given the increased population. In that respect I note it meets the three tests of CIL Regulation 122(2). It will be available to others for use but equally the existing facilities will be used by the population of the appeal site.
- 7.11 Therefore, whilst the provision of housing is a welcome benefit of the scheme the proposal will not foster well designed and beautiful places and this tempers the weight to be given to this benefit.
- 7.12 In the context of the environmental objective I have demonstrated that the proposal would have a significant adverse impact on the character and appearance of the area that far outweighs any benefit that would arise from the redevelopment of previously developed land. In that context it does not require a development of this scale to deliver the benefit of the redevelopment of previously developed land.
- 7.13 I also consider the impact on the amenity of residential occupiers of neighbouring residential roads would be substantial having regard to the number of displaced car parking spaces and the impact on these roads.
- 7.14 With regard to biodiversity gains the site is regenerating and providing habitat and if left would further naturally regenerate and provide enhanced habitat, but I acknowledge the Appellant's commitment to enhancing habitat and achieving biodiversity net gains which will have to be assessed alongside the public access to this urban site and secured. I have addressed the ratio and number of car parking spaces on the site and its impact on other factors and do not consider the Appellant's approach to car parking to be a benefit of their scheme.
- 7.15 I also note the environment provided for some future residents of the proposed scheme will be compromised by the surrounding buildings. For instance the residents of the first, second, third and fourth floors of Block A

will have a southerly aspect looking directly into the five storey Tothill multi-storey car park and its ramped accesses. Two flats on each floor have a single aspect where that is the only outlook from the three habitable rooms in these flats and the balcony. The multi-storey car park is sited just 12 metres from these windows. I also consider the outlook from the lower floors (particular 1 and 2) of Block B looking north to be dominated by the ramped access to the Elmsleigh Centre service area and the rear service areas of properties fronting the High Street. Therefore, whilst not a reason for refusal I consider these matters cannot be treated as a benefit of the scheme.

- 7.16 Overall I have shown conflict with the environmental objective and I attribute substantial weight to this conflict.
- 7.17 I acknowledge that economic benefits will arise from the proposed development. However, any redevelopment of the site will deliver some economic benefits and I acknowledge that its location will have benefits for the town centre economy. I consider the Appellant to double count some of the benefits first setting out resident expenditure and then also identifying expenditure within the town centre I acknowledge both will be a product of the development of this site but my understanding is that the expenditure in the town centre is a component of the residential expenditure of the scheme. I do not consider council tax receipts to be a benefit of the scheme having regard to their function providing services for the residents of the appeal site. I also note that any new residents of dwellings in Spelthorne would be liable to pay Council Tax. I consider the economic benefits of the scheme to carry moderate weight.
- 7.18 Therefore I do not consider the proposal to comprise sustainable development and in my view the adverse impacts of the proposed development would significantly and demonstrably outweigh the benefits of the development proposals and therefore planning permission should be refused in accordance with the decision making process set out in paragraph 11 of the 2021 Framework.
- 7.19 I therefore invite the Inspector to dismiss this appeal.



**1**

KEY



SITE AREA



Plan

Scale: 1:2,500

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2



**KEY**



SITE AREA



1-2 STOREY



3-4 STOREY



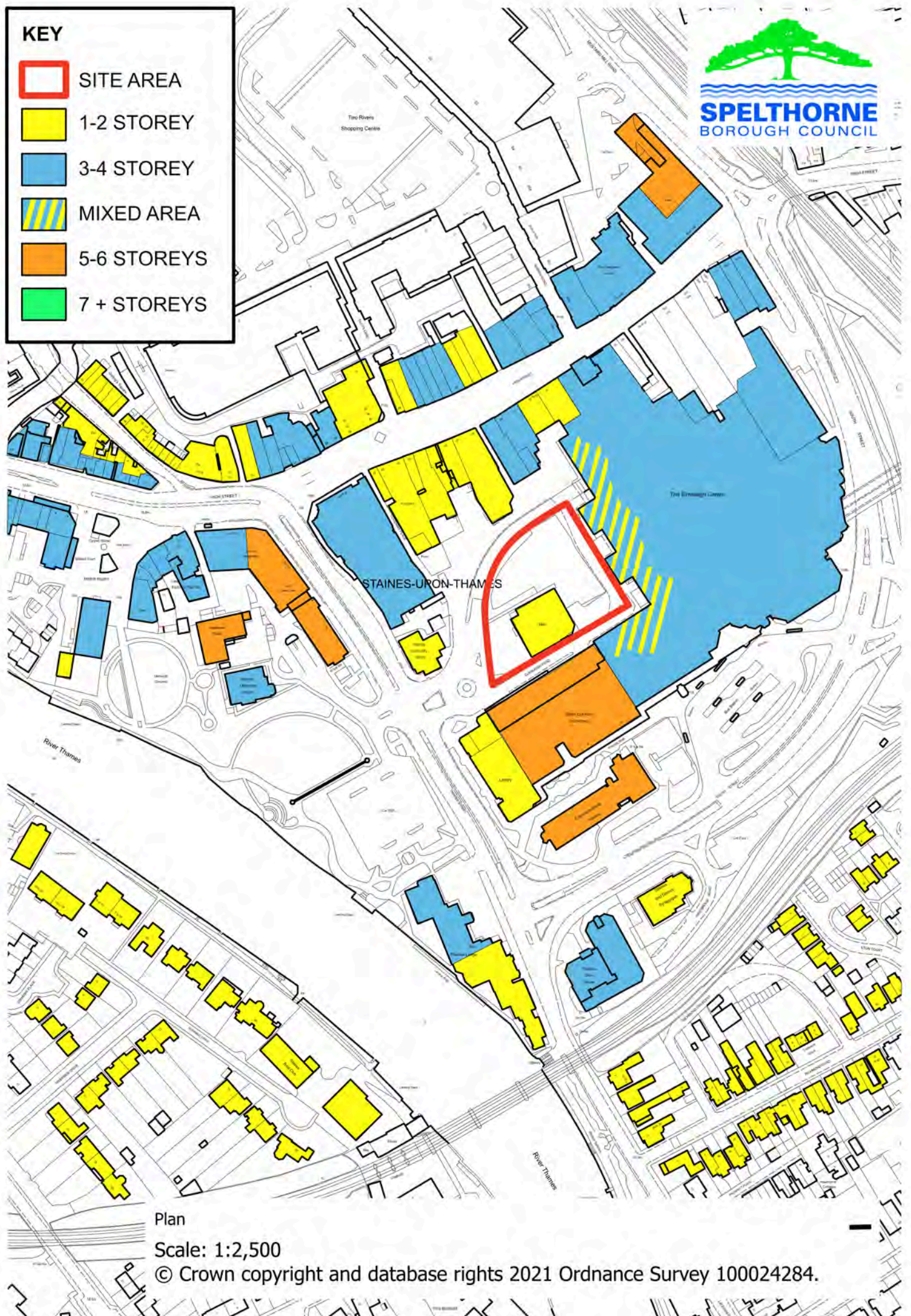
MIXED AREA



5-6 STOREYS



7 + STOREYS



Plan

Scale: 1:2,500

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3



				Total: Car or van availability	No cars or vans in household	1 car or van in household	2 cars or vans in household	3 or more cars or vans in household
E36005778 Staines	Flat, maisonette or apartment	Total: Tenure	Total: Number of rooms	1,452	524	757	160	11
E36005778 Staines	Flat, maisonette or apartment	Total: Tenure	1 - 3 rooms	861	373	428	59	1
E36005778 Staines	Flat, maisonette or apartment	Total: Tenure	4 rooms	472	119	270	78	5
E36005778 Staines	Flat, maisonette or apartment	Total: Tenure	5 rooms	96	23	47	22	4
E36005778 Staines	Flat, maisonette or apartment	Total: Tenure	6 rooms	12	2	9	1	0
E36005778 Staines	Flat, maisonette or apartment	Total: Tenure	7 rooms	5	1	3	0	1
E36005778 Staines	Flat, maisonette or apartment	Total: Tenure	8 or more rooms	6	6	0	0	0
E36005778 Staines	Flat, maisonette or apartment	Owned: Owned outright or with a mortgage or loan	Total: Number of rooms	398	77	254	64	3
E36005778 Staines	Flat, maisonette or apartment	Owned: Owned outright or with a mortgage or loan	1 - 3 rooms	198	45	132	21	0
E36005778 Staines	Flat, maisonette or apartment	Owned: Owned outright or with a mortgage or loan	4 rooms	154	22	100	31	1
E36005778 Staines	Flat, maisonette or apartment	Owned: Owned outright or with a mortgage or loan	5 rooms	41	9	19	11	2
E36005778 Staines	Flat, maisonette or apartment	Owned: Owned outright or with a mortgage or loan	6 rooms	4	0	3	1	0
E36005778 Staines	Flat, maisonette or apartment	Owned: Owned outright or with a mortgage or loan	7 rooms	0	0	0	0	0
E36005778 Staines	Flat, maisonette or apartment	Owned: Owned outright or with a mortgage or loan	8 or more rooms	1	1	0	0	0
E36005778 Staines	Flat, maisonette or apartment	Shared ownership; rented and living rent free	Total: Number of rooms	1,054	447	503	96	8
E36005778 Staines	Flat, maisonette or apartment	Shared ownership; rented and living rent free	1 - 3 rooms	663	328	296	38	1
E36005778 Staines	Flat, maisonette or apartment	Shared ownership; rented and living rent free	4 rooms	318	97	170	47	4
E36005778 Staines	Flat, maisonette or apartment	Shared ownership; rented and living rent free	5 rooms	55	14	28	11	2
E36005778 Staines	Flat, maisonette or apartment	Shared ownership; rented and living rent free	6 rooms	8	2	6	0	0
E36005778 Staines	Flat, maisonette or apartment	Shared ownership; rented and living rent free	7 rooms	5	1	3	0	1
E36005778 Staines	Flat, maisonette or apartment	Shared ownership; rented and living rent free	8 or more rooms	5	5	0	0	0

Total Cars:	549	Cars Per Flat:	0.637631
Total Cars:	441	Cars Per Flat:	0.934322

Cars Per 1 - 2 bed Unit: 0.74268567

Total Cars	174	Cars Per Flat	0.878788
Total Cars	165	Cars Per Flat	1.071429

Total Cars	339		
Total Dwelling	352		
Cars per 1 - 2 bed owned unit	0.96306818		

Total Cars:	375	Cars Per Flat:	0.565611
Total Cars:	276	Cars Per Flat:	0.867925

Total Cars	651
Total Dwelling	981

Cars Per 1 - 2 bed rented Unit 0.66360856

4



**RADIAL**

UK PARKING BEAT  
SURVEY SPECIALISTS

**AREA 2**

**OLD TELEPHONE EXCHANGE  
& MASONIC HALL, ELMSLEIGH ROAD,  
STAINES**



**PARKING BEAT SURVEY**

**MONDAY 11TH OCTOBER 2021**

**17:00 / 19:00 / 21:00**

## SURVEY DETAILS

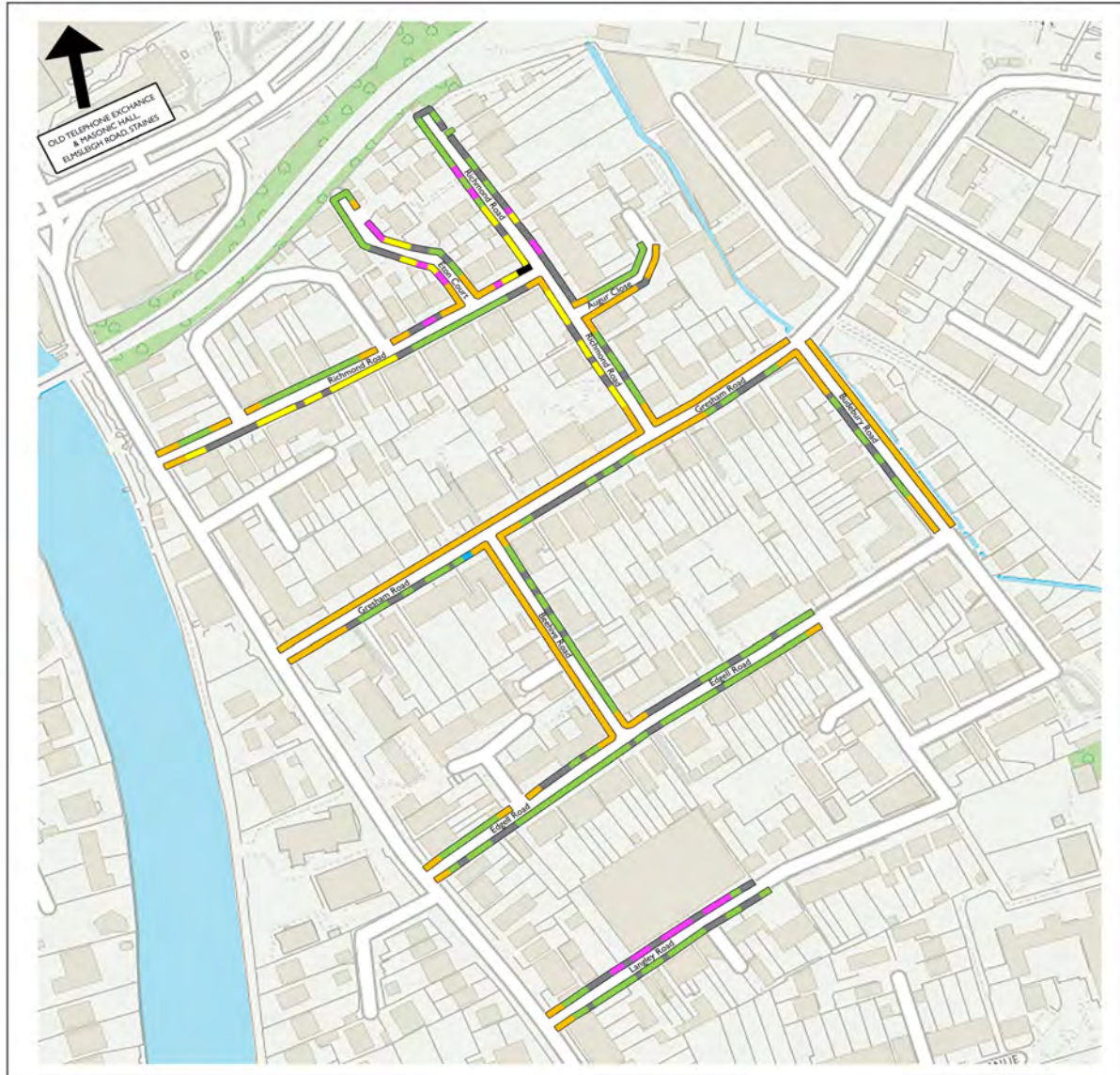
<b>Survey Type</b>	PARKING BEAT SURVEY
<b>Methodology Guidance</b>	London Borough of Lambeth
<b>Site</b>	AREA 2 - OLD TELEPHONE EXCHANGE AND MASONIC HALL, ELMSLEIGH ROAD, STAINES
<b>Survey Area</b>	AREA SPECIFIED BY CLIENT
<b>Date/s</b>	MONDAY 11TH OCTOBER 2021
<b>Time/s</b>	17:00 / 19:00 / 21:00
<b>Beat Frequency</b>	SNAPSHOTS
<b>Unit for 1 Unmarked Lengthwise Space (m)</b>	5
<b>Unit for 1 Unmarked Crosswise Space (m)</b>	2.5
<b>Areas Excluded From Survey</b>	Private parking spaces, private roads and off road parking (unless requested in survey specification).
<b>Sections of road excluded from parking capacity calculation</b>	<p>First 7.5m from junction mouth (for reasons of highway safety).</p> <p>Crossovers, dropped kerbs, build-outs, traffic islands, 24/7 illegal parking.</p> <p>Sections of legal lengthwise parking between illegal parking (crossover, dropped kerbs, double yellow etc) that measure less than the unit specified for 1 space.</p> <p>Where the width of the road is such that parking on both sides would cause an obstruction. In this instance one side of the road has been excluded from the capacity calculation.</p>
<b>Parking excluded from stress calculation</b>	<p>Skips or any other non-vehicle occupying a parking space (but noted separately if observed).</p> <p>Any illegal parking on double yellow lines, crossovers, keep clear lines etc (but noted separately if observed).</p>
<b>Terminology</b>	<p>"Parking Stress" - Calculation to express the number of parked vehicles as a percentage of available parking for each parking type. Stress can be over 100% if cars are small and/or parked very closely together.</p> <p>"Parking Capacity Calculation" - Measurement of each length of road between illegal parking (e.g. crossovers, traffic islands, double yellow etc) converted into parking spaces by rounding down to the nearest unit assigned to one parking space and dividing this figure by the unit.</p> <p>"Lengthwise Parking" - Vehicles parked in a lengthwise orientation with wheels parallel to the kerbside.</p> <p>"Crosswise Parking" - Vehicles parked in a crosswise orientation (as seen in car parks or wide sections of road)</p>





**RADIAL**  
UK PARKING BEAT  
SURVEY SPECIALISTS

**SITE PLAN - AREA 2**  
**OLD TELEPHONE EXCHANGE & MASONIC HALL,**  
**ELMSLEIGH ROAD, STAINES**  
PARKING BEAT STREET INVENTORY MAP



- Unrestricted
- Disabled Permit Holders
- Single Yellow (No Parking Mon-Sat 8:30am-5pm)
- Crossover

- 7.5 Meters From Junction
- Too Narrow
- Double Yellow

→ Direction of Site



# PARKING STRESS TABLES - AREA 2 - MONDAY 11TH OCTOBER 2021

Road	Total Parking Capacity	Unrestricted Spaces	Restricted Spaces		Cars parked in unrestricted spaces			Cars Parked in available restricted spaces						Illegal/Crossover Parking*		
			Disabled Permit Holders	Single Yellow (No Parking Mon-Sat 8:30am-5pm)	17:00	19:00	21:00	Disabled Permit Holders			Single Yellow (No Parking Mon-Sat 8:30am-5pm)			17:00	19:00	21:00
Gresham Road	15	14	1	0	14	15	16	1	0	1	0	0	0	2	2	2
Richmond Road	67	39	0	28	33	30	32	0	0	0	0	1	0	1	2	2
Eton Court	13	9	0	4	11	9	10	0	0	0	0	0	0	0	0	0
Augur Close	8	8	0	0	4	5	5	0	0	0	0	0	0	1	2	2
Budebury Road	5	5	0	0	6	6	6	0	0	0	0	0	0	2	2	3
Edgell Road	51	51	0	0	51	46	43	0	0	0	0	0	0	0	0	0
Beehive Road	15	15	0	0	14	15	15	0	0	0	0	0	0	0	0	0
Langley Road	17	17	0	0	14	12	12	0	0	0	0	0	0	1	1	1
<b>Total</b>	<b>191</b>	<b>158</b>	<b>1</b>	<b>32</b>	<b>147</b>	<b>138</b>	<b>139</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>7</b>	<b>9</b>	<b>10</b>

\*All parking took place on crossovers

## PARKING CAPACITY MEASUREMENTS

A working table showing kerbside measurements for each parking type.

Location	Side of Road & Measuring Orientation	Parking Type	Section Length (m)	Crosswise Spaces or Lengthwise Marked Bays	Number of Crosswise Spaces or Marked Bays	Unit Round Down (If Lengthwise & Unmarked)	Total Spaces
Gresham Road	S E-W	Double Yellow	12.6			10	2
Gresham Road	S E-W	Unrestricted	7.7			5	1
Gresham Road	S E-W	Crossover	16.8			15	3
Gresham Road	S E-W	Unrestricted	9.8			5	1
Gresham Road	S E-W	Crossover	3.5			0	0
Gresham Road	S E-W	Unrestricted	5.6			5	1
Gresham Road	S E-W	Double Yellow	42			40	8
Gresham Road	S E-W	Unrestricted	8.4			5	1
Gresham Road	S E-W	Crossover	3.5			0	0
Gresham Road	S E-W	Unrestricted	6.3			5	1
Gresham Road	S E-W	Crossover	3.5			0	0
Gresham Road	S E-W	Unrestricted	5.6			5	1
Gresham Road	S E-W	Crossover	31.5			30	6
Gresham Road	S E-W	Unrestricted	6.3			5	1
Gresham Road	S E-W	Double Yellow	12.4			10	2
Gresham Road	S E-W	Junction	7			5	1
Gresham Road	S E-W	Double Yellow	7.7			5	1
Gresham Road	S E-W	Disabled Permit Holders	4.9	LW	1		1
Gresham Road	S E-W	Unrestricted	5.6			5	1
Gresham Road	S E-W	Crossover	2.8			0	0
Gresham Road	S E-W	Unrestricted	13.3			10	2
Gresham Road	S E-W	Crossover	7			5	1
Gresham Road	S E-W	Unrestricted	5.6			5	1
Gresham Road	S E-W	Crossover	8.4			5	1
Gresham Road	S E-W	Unrestricted	16.8			15	3
Gresham Road	S E-W	Crossover	7.7			5	1
Gresham Road	S E-W	Double Yellow	32.8			30	6
Gresham Road	N W-E	Double Yellow	210.4			210	42
Gresham Road	N W-E	Junction	6.3			5	1
Gresham Road	N W-E	Double Yellow	76.3			75	15
Richmond Road	N W-E	Double Yellow	11.2			10	2
Richmond Road	N W-E	Unrestricted	17.5			15	3
Richmond Road	N W-E	Double Yellow	10.5			10	2
Richmond Road	N W-E	Junction	6.3			5	1
Richmond Road	N W-E	Double Yellow	8.4			5	1
Richmond Road	N W-E	Unrestricted	53.9			50	10
Richmond Road	N W-E	Double Yellow	9.8			5	1
Richmond Road	N W-E	Junction	6.3			5	1
Richmond Road	N W-E	Double Yellow	9.1			5	1
Richmond Road	N W-E	Crossover	7			5	1
Richmond Road	N W-E	Too Narrow	6.8			5	1
Richmond Road	N W-E	Crossover	3.5			0	0
Richmond Road	N W-E	Double Yellow	11.2			10	2
Richmond Road	N W-E	Junction	14			10	2
Richmond Road	N W-E	Double Yellow	9.1			5	1
Richmond Road	N W-E	Too Narrow	4.2			0	0
Richmond Road	N W-E	Single Yellow (No Parking Mon-Sat 8:30am-5pm)	8.4			5	1
Richmond Road	N W-E	7.5 Meters From Junction	7.5			5	1
Richmond Road	S W-E	Double Yellow	11.9			10	2
Richmond Road	S W-E	Single Yellow (No Parking Mon-Sat 8:30am-5pm)	9.8			5	1
Richmond Road	S W-E	Crossover	28			25	5
Richmond Road	S W-E	Single Yellow (No Parking Mon-Sat 8:30am-5pm)	21			20	4
Richmond Road	S W-E	Crossover	4.9			0	0
Richmond Road	S W-E	Single Yellow (No Parking Mon-Sat 8:30am-5pm)	9.1			5	1
Richmond Road	S W-E	Crossover	4.2			0	0
Richmond Road	S W-E	Single Yellow (No Parking Mon-Sat 8:30am-5pm)	36.4			35	7

Richmond Road	S W-E	Crossover	9.1			5	1
Richmond Road	S W-E	Unrestricted	52.5			50	10
Richmond Road	S W-E	Crossover	11.2			10	2
Richmond Road	S W-E	Double Yellow	7.7			5	1
Richmond Road	W N-S	Unrestricted	29.4			25	5
Richmond Road	W N-S	Too Narrow	7			5	1
Richmond Road	W N-S	Unrestricted	7			5	1
Richmond Road	W N-S	Too Narrow	6.3			5	1
Richmond Road	W N-S	Unrestricted	5.6			5	1
Richmond Road	W N-S	Single Yellow (No Parking Mon-Sat 8:30am-5pm)	11.2			10	2
Richmond Road	W N-S	Crossover	7			5	1
Richmond Road	W N-S	Single Yellow (No Parking Mon-Sat 8:30am-5pm)	18.2			15	3
Richmond Road	W N-S	Junction	10.5			10	2
Richmond Road	W N-S	Double Yellow	9.1			5	1
Richmond Road	W N-S	Single Yellow (No Parking Mon-Sat 8:30am-5pm)	20.3			20	4
Richmond Road	W N-S	Crossover	10.5			10	2
Richmond Road	W N-S	Single Yellow (No Parking Mon-Sat 8:30am-5pm)	9.8			5	1
Richmond Road	W N-S	Crossover	3.5			0	0
Richmond Road	W N-S	Single Yellow (No Parking Mon-Sat 8:30am-5pm)	7.7			5	1
Richmond Road	W N-S	Crossover	7.7			5	1
Richmond Road	W N-S	Single Yellow (No Parking Mon-Sat 8:30am-5pm)	12.6			10	2
Richmond Road	W N-S	Double Yellow	16.8			15	3
Richmond Road	End	Crossover	4.2			0	0
Richmond Road	E N-S	Unrestricted	5.6			5	1
Richmond Road	E N-S	Crossover	4.9			0	0
Richmond Road	E N-S	Unrestricted	4.2	CW	1		1
Richmond Road	E N-S	Crossover	14			10	2
Richmond Road	E N-S	Unrestricted	7			5	1
Richmond Road	E N-S	Crossover	7.7			5	1
Richmond Road	E N-S	Unrestricted	7.7			5	1
Richmond Road	E N-S	Crossover	10.5			10	2
Richmond Road	E N-S	Too Narrow	3.5			0	0
Richmond Road	E N-S	Single Yellow (No Parking Mon-Sat 8:30am-5pm)	5.6			5	1
Richmond Road	E N-S	Crossover	11.2			10	2
Richmond Road	E N-S	Too Narrow	8.4			5	1
Richmond Road	E N-S	Crossover	30.8			30	6
Richmond Road	E N-S	Double Yellow	1.4			0	0