Planning Department  
Elmbridge Borough Council  
Civic Centre  
High Street  
Esher  
KT10 9SD  
29th January 2020

By email to planningpolicy@elmbridge.gov.uk

Dear Sirs

Consultation on Parking Supplementary Planning Document (SPD) (“the consultation”)

We write on behalf of Cobham Conservation & Heritage Trust (“The Trust”) to make observations in this consultation

The Trust has approximately 1,100 members, most from the Cobham, Downside, Stoke d’Abernon and Oxshott area. Before writing this submission, the Trust has gauged some views from its membership and they have helped with the approach taken in this letter.

Purpose of the document

The Trust does recognise a need, as described by the Council, to formulate and encourage what is described as a modal shift and mitigation measures from the policies that currently apply, not least because of Climate Emergency, but does have reservations about the current approach to implementing that.

The Council put this document out for consultation stating (and repeats this throughout the draft SPD) that it was seeking views on it to support the existing Local Plan, which consists of the Core Strategy 2011 and the Development Management Plan 2015. The Council make it clear that the SPD is only to provide guidance in relation to the existing policies, relating to design and layout in new developments, provision for cyclists, electric vehicle charging points, car clubs, travel plans, and the information requirements for parking surveys and assessments. It does this as if existing policy is otherwise satisfactory. The Trust supports these objectives but questions the timetable because there is a need for the holistic scrutiny of all related policies and this SPD should complement as far as feasible what goes into the new Local Plan.

Changes of policy do appear to be involved with the SPD. Wider concepts are considered and while parking standards are recited unchanged there is a change of policy at 3.7 and 3.8 and elsewhere. With the emerging Local Plan now being run on a timetable laid down by a Local
Development Scheme (LDS) revised in December, it does concern the Trust that if this SPD is agreed, there may be insufficient scrutiny of the associated policy which goes into the draft Local Plan document and on to be examined by the Government Inspector.

Under the previous LDS this SPD was to be consulted on in March 2019 and adopted by Full Council in November 2019. In the interim there was to be a Regulation 18 consultation in August/September 2019 from which exercise there would have been scrutiny of the underlying policy that went into the draft Plan for final Regulation 19 consultation and then onward for examination.

It seems that the Council’s current time schedule of the date for adoption of the SPD has actually been brought forward even from the time suggested in the report to Cabinet last December (to Spring rather than Summer 2020).

The further Regulation 18 consultation on “Creating our vision, objectives and the direction for development management policies 2020” is open from 27th January 2020 to 9th March 2020. It is hoped that, inter alia, policy CS25 on travel and accessibility and DM7 on parking will be considered and updated. There must be a case for extending the period of consultation for this SPD to the end date of that. If then, the early adoption of the SPD is genuinely adding value to the process and is needed urgently, it can be finalised and go forward for adoption by the Council in the summer of this year?

Evidence

The structure of the document is that in section 2 there is a review of policy, National, County and local, relating to the topic. This includes the Surrey County Council Vehicular and Cycling Guidance (dated January 2018 but based on a 2012 document) and refers to a Local Parking Evidence Base. As regard this last there is reference to the instruction of WSP to undertake an assessment to review car parking standards. The Council summarises that in paragraphs 2.20 to 2.24 but gives no sight of the original report and it should be made available in full. Without that it is difficult to assess what mitigation measures are needed at this time.

Observations

The Trust makes the following observations on the content of the draft document. It considers that these support a more holistic approach being desirable.

1. In the Trust’s view the current and proposed policy needs to be more prescriptive and the words “should” or “may” should be used less and rather more mandatory language used to accompany the policy. An example would be 2.14 in reciting and retaining DM7 has “the proposed parking provision should be appropriate to the development and not result in an increase in on-street parking stress that would be detrimental to the amenities of local residents”. Why is the word “must” not used so that it can be shortened to e.g. “the proposed parking provision must not result in any increase in on-street parking stress”?

2. Paragraph 2.12 of the draft SPD reminds us that an object of policy is to direct development toward ‘sustainable locations’. The Council must more readily assess and recognise those sites and areas that are not sustainable. A starting point is that national policy is clear – direct development toward previously developed land in Town Centres with good public transport.
3. The document does not seek to change the required parking place numbers set by the existing policy and evidence is not provided to show how the current requirements work. The Trust considers that present policy often requires too few parking spaces to be provided with development. While what is maintained may arise from the aspiration that walking and cycling more are to be encouraged (which the Trust supports), it does not reflect the ever increasing number of vehicles used per residence, in whatever location, due to increased mobility. Even if the future has vehicles as predominantly electric or even operating on hydrogen, they will still need spaces unless there is a revolution in the thinking about public transport.

4. Nowhere in this document is there reference to underground car parking being required where that is feasible to be provided rather than using hardstanding taking up precious open and garden space. This is one measure that could feature as an urgent change to current policy. Further the use of non-permeable materials for the hard standing under parking spaces should simply be prohibited.

5. Couching parking requirements in terms of the ‘maximum’ number allowed for each development is too simplistic. This has very often resulted in too few parking spaces being advanced by developers. The numbers must not only take account of increasing car ownership but also the dramatic increase in home delivery and similar. Parking place numbers for residential developments should be defined as minima not maxima. Multi-unit developments in particular must have a number of spaces provided for likes of visitors, tradesmen, carers and ambulances.

6. The Trust is concerned about the lack of control on on-street parking. While that is a role that is undertaken by Surrey County Council there is a need for that authority to take account of the needs of Elmbridge and for developers to understand that key road links in the borough need to be kept free of parking (perhaps with clearways). There are other roads that have a character that does not make them appropriate for on-street parking. There is no evidence of how the Council have liaised with Surrey County Council, whether for formulating this document or, on these aspects, for the purpose of policies to go into the emerging Local Plan. Locally, for instance, there is an urgent need to review loading/unloading in Cobham High Street particularly during times of high traffic stress and to mitigate the effects of HGVs. These need strong policies.

8. The provision of electric charging is written with existing (even past) technology in mind. ‘Trickle charging’ is obsolete so references to this need removing. There is a case for every space to have a ‘fast charger’ (perhaps defined by reference to a DoiT standard or similar).

9. Appendix 1 deals with the requirement for a survey by developers. It should be made mandatory for every development.

Yours sincerely

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Planning Team
Cobham Conservation & Heritage Trust