## **RUNNYMEDE BOROUGH COUNCIL**

# RUNNYMEDE PARKING GUIDANCE SUPPLEMENTARY PLANNING DOCUMENT (SPD)

TOWN & COUNTRY PLANNING (LOCAL PLANNING)(ENGLAND)
REGULATIONS 2012

**REGULATION 12 STATEMENT OF CONSULTATION** 

- 1.1 The Town & County Planning (Local Planning)(England) Regulations 2012 sets out in Regulation 12 that before a local planning authority adopts a Supplementary Planning Document (SPD), they must prepare a statement (Statement of Consultation) setting out:
  - i) The persons the local planning authority consulted when preparing the SPD;
  - ii) A summary of the main issues raised by those persons; and
  - iii) How those issues have been addressed in the SPD
- 1.2 Regulation 12 also requires that for the purpose of seeking representations, copies of the Statement of Consultation must be made available with the SPD with details of:
  - i) The date by which representations must be made; and
  - ii) The address to which they must be sent.
- 1.3 This document is the Statement of Consultation for the Runnymede Parking Guidance SPD and sets out the persons the Council consulted in preparing the SPD and how their comments have been addressed.
- 1.4 A list of all those persons consulted on the Runnymede Parking Guidance SPD are set out in Appendix A.
- 1.5 The Council consulted with the three statutory bodies (Environment Agency, Historic England, Natural England) in preparing the SPD and their responses and how these were taken into account can be found in Appendix B. The Council also consulted the statutory bodies on a Strategic Environmental Assessment (SEA) & Habitats Regulations Assessment (HRA) screening and the responses received and how they were addressed can be found in the SEA/HRA Screening Determination for the Runnymede Parking Guidance SPD (October 2022).
- 1.6 The Council held public consultation on a draft SPD for a period of 6 weeks from Friday 1<sup>st</sup> July to Friday 12<sup>th</sup> August 2022. 16 representations were received and a summary of these and how they were taken into account can be found in Appendix C.

# Appendix A - List of Persons Consulted on the draft Runnymede Parking Guidance SPD

As well as the persons listed below a further 118 individuals on the Planning Policy consultation database were consulted.

Neighbourhood Planning Services	Lichfields
Brooklands College	Stroude Residents Association
Chobham Parish Council	Savills
Ottershaw Village Hall	Forest Estate Community Hub
The Ottershaw Society	UK Power Networks
Runnymede Churches South	Surrey Heartlands CCG
Iain Vellacott Associates Ltd	Muse Developments
Surrey Community Action	Historic England London and South East Region
CBRE Ltd	ASC Finance for Business
Addlestone Community Centre	The Runnymede on Thames
Barton Willmore	Halogen UK
Dhammakaya International Society Of The United Kingdom	JR Marine
Ottershaw Women's Institute	Thorpe Park (Merlin Entertainments Plc)
The Marine Management Organisation	Rainbow Day Nursery & Pre-School
Thames Water	Home Builders Federation
Co Plug	Calatec Ltd
Terence O'Rourke Ltd	Stellican Ltd
Addlestone Salvation Army	Jaspar Group
Youngs RPS	Adams Group Real Estate Ltd (on behalf of Tarmac)
Cameron Jones Planning	Fairhurst
Carter Jonas	Tarmac
Lyne Hill Nursery	Carter Planning Ltd
Anderhay	Addlestone Baptist Church
Hodders	Tetlow King Planning
Turley	The Planning Bureau Ltd
WYG	John Andrews Associates
North West Surrey Valuing People Group	Sheila Wright Planning Ltd.
Richborough Estates	SETPLAN
Blue Cedar Homes	Strutt & Parker
Vanbrugh Land	Urban Green Developments
NK Homes	DHA Planning
Surrey Wildlife Trust	Reside Developments
Planning Potential Limited	Ashill Group
JSA Architects	Woolf Bond Planning
Berkeley Homes	SSA Planning
Stride Treglown Ltd	Shanly Homes
West Addlestone Residents Association	Andrew Black Consulting
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Union4 Planning	DPDS Consulting
DevPlan	Pegasus Planning
Paul Dickinson and Associates	IQ Planning Consultants
Rickett Architects	Englefield Green Village Residents Association
Runnymede Christian Fellowship	The Emerson Group
Montagu Evans LLP	Grosvenor Capital
Plainview Planning Ltd	Iceni
JP Electrical Ltd	Vail Williams LLP
Woking Borough Council	PRP
Revera Limited	Aston Mead Land & Planning
Devine Homes	Heatons
DP9 Ltd	Pegasus Group
Chertsey Museum	Quod
ST Modwen	AR Planning
Armstrong Rigg Planning	Sanders Laing
Optimis Consulting	Gladman Developments Ltd
Kinwell Property Investments Ltd	LRG
MSC Group Ltd	New Haw Residents Association
Kevin Scott Consultancy	Allied Telesis
R Clarke Planning Ltd	Glanville Consultants
Hallam Land	Avison Young obo National Grid
Meadowcroft Community Infant School	TASIS The American School in England
The Chertsey Society	Meath School
BLARA, BENRA, RRA & RAR	Philip Southcote School
Runnymede Access Liaison Group, Elmbridge & Runnymede Talking Newspaper Association, Runnymede Disabled Swimmers Board, Surrey Coalition of Disabled People, North Surrey Disability Empowerment Group, Surrey Vision Action Group	The Kings Church
The Ramblers	Ottershaw and West Addlestone Residents Association (OWAIRA)
The Georgian Group	The Gardens Trust
Virginia Water Community Association	Turn2us
Friends families and travellers	Chertsey South Residents Association
Wentworth Residents Association	Franklands Drive Residents Association
Stonehill Crescent Residents Association Limited Company	The Twentieth Century Society
Egham Residents' Association	Virginia Water Neighbourhood Forum
Runnymede Art Society	Thorpe Village Hall
Woburn Hill Action Group	Addlestone Historical Society
RSPB England	Woodham Park Way Association
Christian Science Society Egham	Runnymede Dementia Action Alliance
Environment Agency	United Church of Egham
Penton Park Residents Association	Kennedy Memorial Trust

CMA Planning	CPRE Surrey
Theatres Trust	Woodland Trust
Thorpe Ward Residents' Association	Chertsey Good Neighbours
Runnymede Council Residents' Association	Chobham Commons Preservation Committee
Laleham Reach Residents' Association	Hants County Council
St. Paul's Church	Office of Road and Rail
WSPA	Enterprise M3 LEP
Voluntary Support North Surrey	Slough Borough Council
Spelthorne Borough Council	South East Coast Ambulance Service NHS Foundation Trust
Royal Borough of Windsor and Maidenhead	North Surrey Campaign To Protect Real Ale
Surrey County Council	International Community Church
Guildford Borough Council	Egham Women's Institute
Wokingham Borough Council	Sport England
Waverley Borough Council	Imperial College
Bracknell Forest Council	Transport for London
Tandridge District Council	Natural England
Rushmoor Borough Council	Free Schools Capital Education and Skills Funding Agency
London Borough of Hillingdon	Homes England
Mayor of London/London Plan team	Civil Aviation Authority
Elmbridge Borough Council	Ashford & St. Peter's Hospital NHS Foundation Trust
Bigbury Neighbourhood Plan Steering Group	Highways England
Windlesham Parish Council	Affinity Water
Wraysbury Parish Council	Brett Aggregates
Newlands Developments	Bellway Homes
The Oxygen Group	Danescroft
Kitewood	Abri
Bluestone Planning	Sovereign Housing Association
NHS Estates	Redrow Homes
Grade Planning	Network Rail
Surrey and Borders Partnership NHS Foundation Trust	ACS School, Egham
Thorpe Church of England primary School	Pyrcroft Grange School
Manorcroft Primary School	Darley Dene School
St Johns Beaumont	St Ann's Heath Junior School
St Judes C of E Junior School	New Haw Community Junior School
Ongar Place Primary School	Royal Holloway University of London
St Cuthbert's Catholic Primary School	Department for Education
Ottershaw C of E Junior School	Hythe Community Primary School
St Anne's Catholic Primary School	Lyne and Longcross CofE Primary School
Bishopsgate Primary School	Thorpe Lea Primary School
St Paul's C of E Primary School	Sayes Court School
Stepgates Community School	The Holy Family Catholic Primary School

West End Parish Council	Bisley Parish Council
North West Surrey Alliance	Epsom and Ewell Borough Council
London Borough of Richmond Upon Thames	Hart District Council
London Borough of Hounslow	Surrey Police
Mole Valley District Council	Frimley Clinical Commissioning Group
Reigate and Banstead Borough Council	Buckinghamshire Council
Surrey Heath Borough Council	London Borough of Kingston Upon Thames
City Planning	CDS Planning
Beacon Church	Basingstoke Canal Society
Surrey Scouts	Thorpe Neighbourhood Forum
Englefield Green Village Centre	Lyne Village Hall
St John's Church Egham	Longcross North Residents Association
Surrey Muslim Centre	Otthershaw Neighbourhood Forum
Disability Empowerment Network Surrey	Runnymede Foodbank
Runnymede & Weybridge Enterprise Forum	Egham Chamber of Commerce
Runnymede Muslim Society	Lyne Residents' Association
St Paul's Church Egham Hythe	Runnymede Deanery
Just a helping hand	Surrey Positive Behaviour Support Network
New Haw Community Centre	Hamm Court Residents Association
National Trust	Englefield Green Neighbourhood Forum
All Saints New Haw	Arup
Surrey Minority Ethnic Forum	The Victorian Society
Hythe Community Church	Community Life
Egham Museum	Brox Road Action Group
Chertsey Chamber of Commerce	398 Air Cadets
Surrey Chamber of Commerce	Staines and District Synagogue

Appendix B - Consultation Responses received during the preparation of the Runnymede Parking Guidance SPD and how these were Addressed (specifically through consultation on the HRA/SEA screening document)

Persons	Summary of Main Issues	How Addressed
Environment Agency (EA)	No comment	No action required
Historic England (HE)	In light of the Environmental Assessment of Plans and Programmes Regulations 2004, our view is that a SEA is not required in this instance for the reason set out in paragraph 1.42 of the Screening Statement (Runnymede Borough Council, 1st June 2022).	No action required
Natural England (NE)	The topic this Supplementary Planning Document covers is unlikely to have major impacts on the natural environment. We therefore do not wish to provide specific comments	Noted. No changes required.

1.7 The draft Parking Guidance SPD was also shared with Surrey County Council's Runnymede Joint Committee for comment in January 2021. A summary of the comments made by the Joint Committee are set out in the table below with a response provided to each to confirm where the comment had been addressed in the June 2022 version of the draft SPD (which was subsequently approved at the 22<sup>nd</sup> June 2022 Planning Committee for public consultation).

Summary of comments made by the Runnymede Joint Committee	Where addressed in draft SPD
Elmbridge Borough Council have recently updated their Parking Standards and are now requiring parking spaces to be 5 m x 2.5 m, rather than the previous national standard of 4.8 m x 2.4 m. I don't know if this has been considered by Runnymede?	Paragraphs 3.12 to 3.14 sets out the minimum size of parking spaces required, both inside and outside garages/car ports. The minimum size of a parking space is confirmed to be 2.5m x 5.0m.
Under section 3.16 – Travel Plans, it might be useful to reference that Runnymede will update the SPD in the same way as has been done for Electric Vehicle charging provision	This point has been addressed in paragraph 3.20.

e.g.: Should any updated guidance be adopted by the County Council on School Travel Plans following the publication of this SPD, it is this updated guidance that should be relied upon for Development Management decision making.	
I don't know if you want to consider "no car" or "car free" developments at all, there are areas within Runnymede where they may be justified, but there doesn't seem to be any mention of them within the draft SPD.	This point has been addressed in paragraph 3.15 of the SPD.
I note that section 3.10 states: "In following Surrey County Council's approach, the parking guidance included in this SPD expresses neither a maximum nor minimum standard." To clarify, Surrey County Council does recommend maximum parking standards.	Paragraph 3.10 of the SPD has been amended accordingly to address this point.
I think it is worth raising the possibility of the risks associated with securing new CPZs and funding for these via the planning system. That is, there is no guarantee that there will be sufficient funds forthcoming over the years to allow for CPZs to be free-for-use (or at reduced cost) for residents. We can't be certain there will be sufficient development within the localities of Egham and Englefield Green to fund these. This means that there is the chance that residents may need to pay for their permits so that Runnymede BC or Surrey CC do not end up funding the schemes in perpetuity.	This is addressed in paragraph 3.5 of the SPD.

Appendix C - Summary of Representations to the draft Runnymede Parking Guidance SPD and the Council's Response

Name	Response	Comment	Amend SPD?
Private individual	1. Document states, 'For both residential and non-residential developments, the minimum dimension of a > car parking space should be 2.5m x 5.0m'.  This seems to be based on the size of "a large modern car". It seems a poor use of space to require every space to be large enough for the largest cars for 2 reasons.  a. If half the cars are actually smaller than that and you size half the spaces available on that basis, you will be able to accommodate more cars.  b. Many people have larger cars than they need which imposes a cost on the rest of society - for instance in having to reduce the number of car spaces available. If we introduce incentives to have smaller cars like having the ability to find a car parking space big enough more easily, we will change the cost benefit analysis on size of cars and encourage a virtuous cycle towards smaller cars instead of the current arms race towards larger ones.  Large cars tend to be heavier and thus cause more damage in car accidents. Moving towards smaller cars would make the roads safer and give us more space. Looking at <a href="https://www.parking-garage.com/en/car-park-dimensions-garage-width-lengthheight/">https://www.parking-garage.com/en/car-park-dimensions-garage-width-lengthheight/</a> they mention standard dimensions for "European" or "U.S. Compact" as being 2,44 meters * 4,88 meters. So, I see those as an absolute maximum "minimum" size. I suspect that is a U.S. centric measurement where "European" probably means even medium size / large size cars in Europe so I imagine even smaller dimensions actually make sense. Regardless, I think the introduction of "compact" car parking spaces would send a strong and highly desirable message.	<ol> <li>It is not considered to be the place of the Parking SPD to try and limit the size of cars that people purchase. The size of parking space recommended is based on discussions with Surrey County Council and seeks to accommodate the size of many modern cars which are offered on the market.</li> <li>These comments are not relevant to the contents of the Runnymede Parking Guidance SPD. Representor contacted and comments passed to Surrey County Council for response.</li> <li>These comments are not relevant to the contents of the Runnymede Parking Guidance SPD. Representor contacted and comments passed to Surrey County Council for response.</li> </ol>	No

- 2. Bicycle path provision: I was excited a few years ago to hear that there was going to be a new cycle lane between Staines Bridge and the M25 towards Egham. As there was an existing rather pathetic path, I fondly imagined it would be something useful. Instead it was clearly designed without any input from actual cyclists (or it was ignored if provided). Unlike driving a car, stopping and starting a bicycle is expensive for cyclists, both in lost momentum and cognitive load in having to scan for dangers at each crossing. There must be about 10 different places on the so called cycle path where bicycles have to yield to infrequent traffic turning where traffic on the main road can just carry on regardless. In addition, bikes have to bounce down onto roads and up the other side - again unconsciously sending the message that cars have priority even when they are rarer. Even worse, it is shared with pedestrians - which makes the walking experience more deeply unpleasant as they have to watch out for bicycles. potentially coming up from behind and giving them a nasty shock. For these reasons - and completely in line with law, I choose to use the road rather than the pavement/"cycle" lane which I think is best all round. However, for less confident cyclists who we want to encourage, both options are dismal at best. I hope that future cycle paths will take into account research on best practices and design better.
- 3. Pedestrian / cycling signalling often seems to be deliberately aimed to discourage walking/cycling. The pedestrian crossing for the A30 at the Maranello roundabout is particularly awful. You will ALWAYS have to wait several minutes before the lights go green. Given that the nearest junctions are a long way away and that they often go green just as traffic intensifies there is zero good reason for this. I cannot understand any reason why they shouldn't go green immediately. Similarly, the pedestrian/bicycle crossing lights at the Burger King roundabout across the A30 will be red even if cars are stopped and remain stopped for some considerable time. Why can't they be synchronized with those lights and be green when it is safe to cross?

Private	
individua	I

- 1. It is a great shame that the Car Ownership data in section 2 is over 10 years out of date. Basing anything on this data is fundamentally flawed. Some projection needs to be made to estimate the current situation and I would suggest taking the percentage increase between 2001 and 2011 and applying the same percentage increase to the 2011 figures. Then for the purposes of planning for the next 10 years I would suggest adding that same percentage again. This would mean 35,000 cars/vans total and well over 15,000 households with two or more cars/vans Notably 3,300 with three and almost 1,500 with four.
- 2. I do not believe that car ownership will decrease over the next ten years, nor that there will be any major switch to other transport modes. Having said that, users of other transport modes by preference will I believe that keep their cars for journeys where other modes are not practical/possible. In other words, any switching to other modes will not reduce car numbers, just car journeys. Equally, sometimes a car journey is necessary to travel to the access point for other transport modes, for example getting to the station.
- 3. Which brings me on to the fact that parking at local stations is also totally inadequate. For example Addlestone which has none and Byfleet & New Haw which has almost none.
- 4. Locally it is abundantly clear that there is far from sufficient parking for current needs. For example, many houses around our area of Addlestone have no driveway but are home to 2 or more cars, hence the streets are hugely congested due to parked cars. The cars are often dangerously and/or illegally parked for example fully or partly on the path, too near to junctions, blocking dropped curbs, blocking driveways, etc. This parking causes traffic issues, problems for the emergency services, problems for wheelchair users and people pushing prams/ push-chairs and danger to pedestrians. The problem has become noticeably much worse over the last 10 years.

- 1. This section of the report has been updated using Department for Transport (DfT) data on licenced vehicles. Data from the National Trip End Model (NTEM) has also been interrogated to understand likely future trends in car ownership.
- 2. Comments noted. As referred to in response to comment 1 above, report now contains text on predicted future trends in car ownership.
- 3. Comments about station parking are noted. The Parking SPD cannot address existing parking situations in the Borough unless a planning application is submitted for the extension of a car parking area associated with a particular use. Whilst the SPD does not contain a specific standard for an extension to a station carpark, the table at Appendix 1 of the SPD confirms that where a use/type of development is not specifically listed in the table, an Individual Assessment for both car and cycle parking will be required in support of a planning application. This would propose a bespoke car parking scheme, appropriate to the use and/or its location, particularly when taking account of other policies and practices in place and which are associated with the operation of the development. In such circumstances, a site-specific parking and travel plan can take detailed account of the ability of people to walk, cycle or travel by public

1. Yes

It is important to note that Runnymede and Surrey have a much greater percentage of households with multiple cars than the national picture. This will remain true due to the relative affluence of the area and the increasing number of grown-up 'children' who cannot afford to move to their own property because of the very high cost of renting or buying.

- 5. Appendix 1: A visit to any industrial/warehouse or office blocks estate is all that's needed to see that current parking provision is totally inadequate and causes overspill parking into neighbouring residential areas.
- 6. Pass any school (outside school run times) and you will see huge numbers of cars lining local roads due to inadequate onsite parking for staff (& pupils). Churches tend to have grossly insufficient parking, again causing huge number of cars parking on local roads during services, which can be an issue especially in the case of weekday services.
- 7. Appendix 2: Where flats have been built using these guidelines the 'visitors' spaces are always full, probably mostly used by residents. Equally, surrounding roads are choked with the overspill parking. As another example, the car park at Crouch Oak Surgery, Addlestone also gets choked with overspill parking from nearby flats. Many 2 bedroom flats have 2 or 3 people living there and 2 cars. Many 3 and 4 bedroom houses have 3, 4 or 5 people living there and up to 4 cars.

transport to the station in deciding on the level of parking required.

4. Comments regarding nuisance parking should be reported to Surrey County Council. The SCC website provides more information at: <u>Highway issue - What is the issue? - Surrey County Council (surreycc.gov.uk)</u>.

Whilst comments are made about existing parking being inadequate locally, this SPD is unable to address existing parking situations in established developments. The SPD will be used to assess the suitability of parking levels where new development is proposed, or extensions to existing parking arrangements.

The Council considers that the standards contained within the SPD are appropriate to ensure a suitable amount of parking provision for a range of different types of new development moving forwards. In response to the comment regarding households owning multiple cars, residential standards in the Parking SPD are expressed as neither maximum nor minimum standards. This is to enable development proposals to respond fully and flexibly to the characteristics of their location, taking account of the availability of alternative means of travel in the area, car parking issues in the locality and to make the most efficient use of land.

- 5. Comments noted. The parking standards contained in the Runnymede Parking SPD are considered appropriate for new developments of these types in the Borough. All of the vehicular standards for non residential uses are expressed as maximums in order to encourage travel to 'destinations' by means other than the private car and to prevent excessive car parking provision at those destinations. This is in line with the approach recommended by Surrey County Council in their adopted Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development (November 2021). The recommended maximum standards for industrial and storage and distribution uses follow the standards recommended by SCC. The maximum vehicular standard for office developments follows the advice of Project Centre ltd, who were appointed by the Council to look at appropriate locally derived parking standards for both offices and Purpose Built Student Accommodation (PBSA) in response to local concerns about overspill from these specific uses into surrounding residential areas. As such, the standard for offices have been locally tailored.
- 6. As set out above, the SPD will not be able to address parking deficiencies at existing established premises unless a planning application is received to extend the parking area. In such a scenario, the Parking SPD would then help assess if the proposed level of

		parking was acceptable. For new places of worship and schools, the SPD sets out that the maximum vehicular parking standard is 1 car space per 10 seats OR Individual assessment/justification. For schools, an individual assessment is also required linked to a transport assessment/travel plan. This would allow a bespoke car parking scheme to be developed, tailored to the specifics of a proposal.  7. It is the responsibility of the landowner/managing agent of such schemes to police who parks in the visitor spaces within a development. This type of issue goes beyond the scope of the Parking SPD. Please refer to response to comment 4 above in relation to comments make about the adequacy of parking in existing residential development, and also the suitability of the parking standards for new residential developments.	
Private individual	Parking is a problem all over the borough. I have often wondered why the ground by the station which was supposed to be for new housing, but couldn't (I believe because of the underground river) wasn't made into a car park for the station. This would help the borough as many commuters park in the side roads, making it difficult for family, health visitors for the elderly etc. to find parking.	It is unclear which station is being referred to in this letter and as such, it is difficult to provide specific comments in response.  Whilst the SPD does not contain a specific standard for an extension to a station car park, the table at Appendix 1 of the SPD confirms that where a use/type of development is not specifically listed in the table, an Individual Assessment for both car and cycle parking will be required in support of a planning application. This would	No

		propose a bespoke car parking scheme, appropriate to the use and/or its location, particularly when taking account of other policies and practices in place and which are associated with the operation of the development. In such circumstances, a site-specific parking and travel plan can take detailed account of the ability of people to walk, cycle or travel by public transport to the station in deciding on the level of parking required.	
Private individual	1. I think any policy needs to reflect the realty that cars are here to stay, be they electric or otherwise.  2. Building more electric points for the future will be essential.  3. Reducing the proportion of parking spaces is hugely short sighted. People in the borough live and work in such a wide variety of places that using public transport will never be a large part of the solution (taking 2 hours to complete a journey that may take 45 mins each way is never going to be an option). Unfortunately our weather and time pressures will never make cycling more than a minority contribution. The only option is to encourage people never to leave their homes and that does not feel right.  Parents with children often need to do one or two stops in different directions before they even arrive at work on time. Then they often need to travel to after school sports activities, we want our children to breath clean air but we also recognise the need for them to be active and healthy. Children of different ages have different requirements but at a young age they cannot go on buses alone and the chances of it being only one bus is unlikely. Food shopping, Drs appointments, sports clubs, any leisure pursuit without a car is a massive challenge, not everything can be done on zoom!	<ol> <li>Comments noted. The SPD has been updated to include additional information on likely future trends in car ownership in the Borough. Based on past ownership trends, this shows a projected steady increase in car ownership up to 2031.</li> <li>The Parking SPD sets out the electric vehicle charging requirements for various types of development, along with charge point specifications and power requirements for the Borough in line with current guidance published by Surrey County Council. This builds upon the requirement in policy SD7 of the Local Plan which sets out that, 'Development proposals will be supported where they, subject to feasibility, incorporate electrical vehicle charging points in accordance with guidance issued by Surrey County Council'.</li> <li>The vehicular parking standards recommended in the Runnymede Parking SPD are, in the majority, based</li> </ol>	No

If future developments do not address the real need for a good amount of parking provision when planning then overspill onto the streets will become an even bigger problem than it is now. Increased parking spaces make a town thrive. If you reduce a towns parking provision it will die. It may be unfair but can all of you involved in this project spend one month where your whole family uses exclusively public transport or bicycles to get around and keep a diary to show the rest of us how this will really work.

on the standards recommended by Surrey County Council, in their capacity as the Highway Authority, and as taken from their Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development (November 2021). It is recognised that the availability of car parking has a major influence on the means of transport people choose for their journeys. It is therefore essential to try and get the balance right, by providing an appropriate level and type of parking, protecting highway safety and promoting transport sustainability. The Parking SPD seeks to strike this balance and also respond to the policies within Surrey County Council's recently adopted Local Transport Plan 4 which seeks to support behaviour change through the Avoid, Shift and Improve principle:

- Avoid unnecessary petrol car use by reducing the number and length of trips needed by improving land use planning, travel planning and levels of digital connectivity.
- Shift travel to more sustainable modes: public transport, walking, and cycling, away from car use.
- Improve emissions intensity and energy efficiency of vehicles and operational efficiency of roads through technology improvements.

Many non-residential uses are proposed to be supported by an individual

assessment in the SPD to allow bespoke car parking schemes to be proposed, appropriate to the use and/or its location, particularly when taking account of other policies and practices in place and which are associated with the operation of the development. In such circumstances, a site-specific parking and travel plan can take detailed account of the ability of people to walk, cycle or travel by public transport to their destination in deciding on the level of parking required.

Residential standards in the Parking SPD are expressed as neither maximum nor minimum standards. This is to enable development proposals to respond fully and flexibly to the characteristics of their location, taking account of the availability of alternative means of travel in the area, car parking issues in the locality and to make the most efficient use of land.

In relation to town centre parking, at the outset, it should be noted that the SPD does not propose to alter the amount of parking available in existing town car parks, or through existing on street parking arrangements. The guidance within the SPD is only applicable to new developments coming forward in town centre locations.

The recommended standards for new developments are considered appropriate as the Borough's town centres generally offer sustainable

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		travel alternatives to trips by private car. This means that there are more opportunities within and near the Borough's town centres for active and sustainable travel, and less need to provide equivalent levels of car parking as part of new development (both residential and non-residential uses) within a town centre location.	
Private	1. I am concerned that at a time when National Highways	1/3. The SPD does not propose to	No
individual	(Formally Highways England) is starting work that will increase traffic flow through the junction of the M25 and A3, and Surrey County Council is due to begin work on increasing capacity for traffic on the A320, both of which are likely to encourage greater private vehicle use, that Runnymede Borough Council is reducing the amount of on-street parking space available in the area.	reduce the amount of existing on street parking provision in the Borough. The guidance within the SPD is only applicable to new developments coming forward in the Borough, setting out the recommended parking standards for both vehicles and bicycles for various types of development.	INO
	2. I have seen more than one new set of yellow lines put in on Princess Mary's Estate in Addlestone and as far as I can judge, this explains the increased parking on the High Street, thereby reducing traffic flow along that road. Local opinion suggests that the explanation for repeatedly adding more yellow lines to Princess Mary's Estate appears to be that residents there believe they have exclusive rights to park on those roads. To the best of my knowledge, the estate is not private, its roads are public and therefore the residents have to accept that other road users will park there. I am also aware of a fallacious argument among some people that it is commuters who cause the parking problem. While there may be some truth to this, it is difficult to believe that those commuters are "commuting" from Addlestone to anywhere else since the train service from Addlestone does not lend itself to such behaviour. Therefore, these people are presumably commuting into Addlestone in order to work in the town, and so to make their experience here more difficult makes little sense.	In terms of future proposals to improve public transport, Surrey County Council has recently adopted Local Transport Plan 4 which seeks to support behaviour change through awareness campaigns and other activities to encourage walking, cycling and use of public transport and zero emission vehicles (ZEVs). An ongoing programme of activities to make residents and businesses aware of opportunities to change behaviour, how to do so, and the benefits, is recognised to be essential to make sure that enough people travel differently, at least some of the time.	
	3. At a time when local shops are struggling and we need to ensure people can get here so that they can work in the town,	Through their public and shared transport policy in LTP4, Surrey County	

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	taking away parking in the town centre simply pushes the problem further out, thereby making the experience for people visiting and working the town less enticing, while making it far more arduous for people living here.  If this problem is looked at as a mathematical equation, it simply does not add up. At what point does the council turn this around and either discourage road development that increases traffic flow or accept that there is a need for maintaining, if not increasing, the provision of on-street parking? Perhaps there is a need to improve public transport, but speaking as someone who came to Addlestone from London over thirty years ago, I did not understand the public bus network here at that time. I believe therefore, that new residents to the town, many of whom I am informed come from London, may be of a similar opinion to me when I came here; that they don't understand or trust the public transport system here sufficiently to rely upon it. The only thing I did understand is why the old Peterbus service was stopped, which is because I never understood whether it was a public bus, or simply for use by people going to and from the hospital.	Council also propose to provide high-quality, reliable, affordable, and joined up public, shared and demand responsive transport, supported by accessible and easy to use travel information and booking systems, with the aim of shifting travel to more sustainable modes: public transport, walking, and cycling, away from car use.  More information about Local Transport Plan 4 can be found at: Local Transport Plan (LTP4) - Surrey County Council (surreycc.gov.uk)  2. Comments noted regarding the Princess Mary's Estate, however these comments go beyond the scope of the Parking SPD given that this is an established residential area. The guidance contained in the SPD would only apply to new developments, although this could include individual home owners within the estate who may wish to increase their own private parking area within their curtilage where such a proposal would require planning permission.	
Transport for London	We have no specific comments to make on the draft SPD we draw your attention to London Plan parking standards set out in Policies T6 – T6.5 <a href="https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf">https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf</a>	The parking standards for the London Plan have been reviewed but are not considered locally relevant to Runnymede Borough.	No
Egham Residents Association	1-The Egham Residents' Association wishes to begin its response to this draft SPD by congratulating the council on the broad thrust and much of the detail of it.	1-Support welcomed. 2-Comments noted. 3-Comments noted. 4-Support welcomed.	
	2-The evidence that catastrophe awaits us unless we act to arrest climate change grows stronger every day, and this draft	5-The parking survey work undertaken supports that it is most likely that the on-	

SPD is a welcome contribution to the arsenal of measures that will be necessary.

3-The required change will not come without pain and inconvenience. A great shift over not many years from maximalist to minimalist parking provision in planning policy - and no provision at all in some locations, including town centres - has shocked some people, and care needs to be taken in the pace of implementation. But in the final analysis the roars of protest from people who still want to drive and park cars in traditional ways have to be largely ignored.

Awareness of the seriousness of climate change has increased massively in the course of this century, yet vehicle ownership in Runnymede has grown slightly over the past 20 years - contributing to the fact that 46pc of carbon emissions in Surrey are generated by transport. We cannot continue like this.

Specific points:

# 4-Section 3: Parking guidance for Runnymede, Non-residential development, paragraph 3.2:

We welcome the recognition here that "many non-residential uses do not require car parking to be provided" and the statement that "in line with Surrey County Council's approach, the car parking standards for non-residential uses set out on this guidance are expressed as maximums in order to encourage travel to destinations by means other than the private car and to prevent excessive car parking provision at those destinations". We also accept of course (How could we not?) that town centres are best suited for putting the 'new' thinking into practice.

### 5-Paragraphs 3.3 and 3.4

We applaud the implicit recognition in 3.3 that Royal Holloway is an "essentially commercial entity" and the further recognition in 3.4 that College-related parking has exacerbated parking problems in nearby streets in Egham and Englefield Green.

street parking pressures in the Egham and Englefield Green areas are generated by non-residential demand given the heightened demand for on street parking during the day time surveys (para 3.2.12 of Project Centre report). Para 4.1.5 of Project Centre's report further suggests that these pressures could be caused by students who are travelling to the University from areas that have limited alternative travel options rather than students living in nearby PBSA.

6-The Parking Team at Surrey County Council was contacted for an update. A response has been received and this has been passed on to Egham Residents Association

Residents Association. 7-Support for approach welcomed. 8-Support for approach welcomed. 9-Support for standards welcomed. In relation to the proposed standard for 4+ bedroom dwellings, this has been reduced to 2 parking spaces in line with the recommendation in the Surrey Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development guidance (November 2021), albeit it, in line with the other residential parking standards contained in the SPD, this will be applied flexibly to enable development proposals to respond fully and flexibly to the characteristics of their location, taking account of the availability of alternative means of travel in the area, car parking issues in the locality and to make the most efficient use of land. This proposed approach is considered to be largely in line with

But we are somewhat baffled by the last sentence's stating: "The survey results found that high levels of on street parking were being exacerbated by non-residential demand including people commuting to the area during the day time, potentially including those travelling to the University, rather than from the Purpose Built Student Accommodation". Is this really saying that students living in PBSA and parking their cars in the streets of Egham and Englefield Green aren't causing much of a problem?

#### 6-Paragraph 3.5

This paragraph gives us an opportunity to re-emphasise that we believe many people in the part of Egham to the west of Station Road and north of the railway line would welcome the introduction of a CPZ and that they are fed up with the lack of progress on this matter.

#### 7-Residential development, Paragraph 3.10

We welcome the fact that the draft SPD proposes neither a maximum nor minimum parking standard for residential development. This flexibility seems sensible.

#### 8-Car free developments. Paragraph 3.15

We accept that there can be a case for this in town centres and we are indeed already becoming used to it. We welcome what is said in the draft SPD about cycle parking, electric vehicle charging points and car clubs.

#### 9-Proposed car parking standards

Overall, these seem very reasonable. We like the proposal that there should be no parking provision for hot food takeaways in town centres. We also approve of the proposed parking standards for student halls of residence/residential colleges. We agree too with the parking guidance for new residential development within use class 3 - with the exception of the suggestion that there should be 3 spaces for 4-bedroom homes; this seems excessive and contrary to the body and spirit of the draft SPD.

SCC's approach, given that 'note 1', which is applied to the 4+ bedroom standard and many of their other recommended residential parking standards states that, 'Where space permits, it may be appropriate to consider increased provision'. This would indicate that SCC also believes that a degree of flexibility is important in applying their recommended standards.

Englefield Green Village Residents Association (EGVRA) Comments made relate to student parking.

Comments on the report produced by Project Centre Ltd

1. From the census data, the further away from RHUL a student lives, the more likely he/she is to have a car. The conclusion from this is that the primary reason that students have cars is to travel to RHUL for study. Based on this conclusion, and the lower student/ car ratio nearer the university, it is then argued that PBSA's are unlikely to have an impact on street parking. (5.1.1).

No survey has been carried out of why students have cars. Whilst obviously those who live far away and have no other means of transport need a car to get to the university, there is not the evidence to demonstrate that this is the primary reason. It is our view, supported by anecdotal evidence, that the primary reason that a student owns a car is for pleasure and socialising.

The other factor that has not been taken into account is the number of foreign, primarily Chinese, students at RHUL. These student numbers are significant and come from well off families, (otherwise they would not be able to afford the fees). It is known that some have expensive cars and yet live on the Campus.

2-The survey of parking in RHUL seems to indicate that there are spaces available during the day. This is not the case. Again, anecdotal evidence from a number of those that work at RHUL and have to find a car space indicate that there are generally no spaces left after 9am on an average working day. The argument that a student who lives a distance away from the University can find a space when coming to a lecture or other activity (even if they have a pass, to which we understand they have a right if they live more than 1.5 miles from RHUL) is not correct (5.1.4 indicates RHUL travel plan 'provides parking for those who cannot find an alternative' is not correct in two respects a) because there are no spaces even if you have a pass and arrive after 9am and b) because the passes are restricted to those who live more than 1.5m away). 3-The survey indicates that some Englefield Green streets. close to the PBSAs, are saturated with parked cars most of the time. Thus, if a student in a PBSA has a car, and the very few

1-Comments noted. Surveying students to find out why they own cars could be interesting in seeking to better understand the reasons as part of a wider strategy to change behaviours. However, this goes beyond the evidence that was felt to be required in order to determine what the source(s) of on street parking pressures in Englefield Green and Egham are and to determine an appropriate parking standard for Purpose Built Student Accommodation.

In relation to wider strategy to support behaviour change, Surrey County Council adopted Local Plan Transport Plan 4 (LTP4) in July 2022. LTP4 contains a specific policy on this matter and is based on the Avoid, Shift and Improve principles set out as follows:

- Avoid unnecessary petrol car use by reducing the number and length of trips needed by improving land use planning, travel planning and levels of digital connectivity.
- Shift travel to more sustainable modes: public transport, walking, and cycling, away from car use.
- Improve emissions intensity and energy efficiency of vehicles and operational efficiency of roads through technology improvements.

Extensive campaigns are proposed to encourage and support the change to influence different sectors of the

No

spaces at the PBSA are taken, he will take a remaining street space if he can. This has a significant and disproportionate effect on residents parking. There would be little effect of one or two extra cars if there was plenty of street parking. But in the case of many of the streets of Englefield Green, residents are already finding difficulty finding a space, and the addition of even one or two extra cars significantly impacts on resident parking.

4-The survey of other universities and the number of spaces allocated per PBSA in other locations is irrelevant as it does not reflect the circumstances here at RHUL. Why would Guildford specify a number, yet Woking has no specification? Obviously because their circumstances are different. Here in Englefield Green, we have a Victorian village (population 10,000 residents) with narrow streets bang up against a 10000 student university with plans to expand in the future to 15000. This is not comparable with Guildford or Woking.

5-The sum of these points seem to us to indicate that the statement made in 5.1.1 that 'PBSA's are unlikely to have an impact on street parking' (in Englefield Green) is incorrect, and more likely to reflect a need to justify small numbers of parking spaces for students at PBSA's rather than the actual facts would indicate.

#### Content of Supplementary Planning Document

6-We totally agree with the need for a CZP. Despite the protestations from some parts of the community regarding extra charges, we think this is the only solution. We need to 'defend' the rights of residents to park outside or near their homes, and I'm afraid this is the only sensible way. However, given that we are at a time of increasing hardship, we feel that any charges for such a scheme should be kept to a minimum or at a subsidised rate for the first couple of years until its effectiveness is demonstrated and (hopefully) the current economic crisis is over.

7-We disagree with the proposed number of parking spaces allocated to students in PBSA's. The points raised above indicate that there are very special circumstances in EG for

community. It is also proposed to use technology (such as smartphone apps) and incentives to help change behaviours. The policy can be viewed in full at: Supporting behaviour change policy area - Surrey County Council (surreycc.gov.uk)

Additionally, the RHUL Travel Plan aims to help/influence a change in travel behaviours to and from the university with a focus to reduce car use and increase active travel where practicable and feasible.

2- To confirm, a parking survey was undertaken in areas that form the Englefield Green and Egham area as reported and shown at Section 3.2 of Project Centre's report, and shown at Appendix A (Parking Survey Technical Note, Figure 2). These areas were identified following discussions with Councillors and Council Officers. The surveys were undertaken during nonterm time (15th and 16th September 2021) and term time (17th and 18th November 2021) to establish the patterns of parking occupancy/stress during these times. The surveys were commissioned by the Council and were subsequently undertaken by MHTC data collection company on the instruction of Project Centre. Their raw data is available for viewing at the end of Appendix A of the Project Centre report. The parking survey indicated some roads within the vicinity of RHUL being at capacity or over capacity during term

raising the number of spaces substantially. We realise the cost of building in significant spaces will be high- it could be that the whole ground floor footprint is used for parking, for example-but that is the price you would have to pay for proposing to build in already congested areas such as EG.

8-Alternatively, we suggest that an additional restriction be placed on those who choose to reside in these blocks- that they are banned from having a car. This is not unreasonable if you think about it- the new modes of transport (e bikes, e scooters) are inevitable, and both EG (if we get funding) and

RHUL are planning a big expansion of facilities for these

modes of transport.

time and non-term time as indicated within the survey data which would be in accordance with the representor's comments. However on average, within the surveyed area there was some level of capacity across the area albeit an average capacity of 70% parking stress during non-term time and 88% during term time which indicates the area surveyed is reaching concerning levels of stress.

To confirm, no on-campus surveys were undertaken as part of Project Centre's study. However Project Centre did receive data from RHUL relating to vehicle arrivals between 15th and 19th September 2021 during this period (prior to term time starting for moving in purposes), and the car parking capacity of spaces on site within the campus. Having this data allowed Project Centre to account for the arrivals and potential on-street parking that may have occurred which provided a more accurate account reporting of the baseline data for non-term time student surveys. Based on the information received, Project Centre concluded it was evident that there would be capacity to accommodate the actual arrivals within the campus grounds car park (related to moving in) as summarised on page 4 and 5 of Appendix A.

Paragraph 5.14 of the main report references the RHUL Travel Plan which can be viewed on the University's website. No survey was undertaken or

commissioned relating to capacity at the university carparks. If the representor would like this type of information, this should be requested directly from RHUL. 3- The parking surveys carried out by Project Centre Ltd show that the parking pressures being experienced in the Englefield Green area are also being caused by people commuting to the local area and not exclusively by residents from nearby PBSA's. This is given the heightened demand for on street parking during the daytime surveys (para 3.2.12 of Project Centre report). Para 4.1.5 of Project Centre's report further suggests that these pressures could be caused by students who are travelling to the University from areas that have limited alternative travel options rather than students living in nearby PBSA. 4- Comments noted. The purpose of the literature review is to provide contextual information around how other Local Authorities are setting parking standards for student accommodation. Whilst it is accepted that no two areas are the same, comparator authorities were chosen due to similarities in the nature and context of the location i.e., within Surrey, local transport provision, and the presence of campus universities which vary in size. 5-Project Centre's statement at paragraph 5.1.1 is summarising (based

on the evidence provided in section 4) that the setting of PBSA parking standards alone will not solve the current on-street parking pressures/problems as described in section 4 of the report. This section of the report is ultimately stating that new PBSA standards can help shape ownership and demand going forward which will have a positive impact, but will not solve all the current parking pressures (including Englefield Green) as parking pressure in the area is not solely from students parking on residential streets as discussed in Section 4 of the report.

6-Support for CPZ noted. Representor is encouraged to discuss this matter further with the Parking Team at Surrey County Council who can be contacted at:

highways@surreycc.gov.uk

7-Comments noted, however the evidence produced by Project Centre would not support this approach. As stated in Section 5 of Project Centre's report, setting higher, or minimum, parking standards for PBSAs located close to RHUL may even increase parking demand associated with travel to the university. Facilitating car ownership through high parking provision can lead to habitual car use for short journeys where students may have otherwise used viable alternative, sustainable modes from the PBSA sites. Notwithstanding the above, without the

implementation of CPZ controls in the area, there is no means of managing or restricting student car ownership at new developments.

Additionally as stated in paragraph 3.38 which is related to off street parking/ and or higher minimum standards (i.e. provide more parking spaces off street for students in PBSA's) encourages continued car use directly into the builtup areas, which increases congestion and is detrimental to air quality. This would be contrary to the Surrey Climate Emergency targets. RBC has also recently made a commitment to a target of Net Zero carbon emissions for its own operations by 2030. The overarching target for the Borough and the UK is to reach Net Zero carbon emissions by 2050.

8-Section 70(1)(a) of the Town and Country Planning Act enables the local planning authority in granting planning permission to impose "such conditions as they think fit". This power needs to be interpreted in light of material considerations such as the National Planning Policy Framework, this supporting guidance on the use of conditions, and relevant case law. Paragraph 55 of the National Planning Policy Framework makes clear that planning conditions should be kept to a minimum, and only used where they satisfy the following tests:

- 1. necessary;
- 2. relevant to planning;

		3. relevant to the development to be permitted; 4. enforceable; 5. precise; and 6. reasonable in all other respects.  Such a condition attached to any planning consent for a new PBSA which sought to ban occupiers from owning a car, in the opinion of officers, would not meet tests 4 and 6.	
National Highways	1-The new parking guidance will complement the Local Plan policies and it is expected that all new development proposals will follow the requirements of this document. The draft guidance covers a wide range of uses with maximum numbers of parking spaces for commercial and other non-residential development; the proposed number of spaces are in line with NH expectations for the various type of use, some of which are lower than the current guidelines.  2-For residential developments flexible 'guidelines' are provided rather than more rigid 'maximum' or 'minimum' standards, the reason provided for this is to enable development proposals to respond fully and flexibly to the characteristics of their location, taking account of the availability of alternative means of travel in the area, car parking issues in the locality and to make the most efficient use of land.  3-One of the biggest opportunities for managing down traffic demand on the SRN is associated with limiting parking spaces at a destination, which should be the case when using the draft guidance. This is particularly successful when guidance such as this is supported by the delivery of other sustainable transport measures including the implementation of Travel Plans, the use of which is detailed in the draft guidance and would be welcomed for all new developments, including residential developments.	1-Comments noted 2-Comments noted 3-In line with this advice, maximum standards are proposed for inclusion in the SPD for non-residential uses. In relation to the comment made regarding Travel Plans, the SPD contains text on Travel Plans in para 4.22. This confirms that as well as requiring Travel Plans for schools, 'there is a similar expectation with other institutions, large scale commercial and residential schemes. The County Council has separate guidance on Travel Plans available on their website. Runnymede Borough Council fully supports and will implement the County Council's guidance in respect to travel planning'. The County Council's current Travel Plan guidance from July 2018 can be viewed here: Travel plans - a good practice guide for developers, July 2018 (surreycc.gov.uk). This confirms the thresholds to be applied in determining if a Transport Statement and Travel Statement or a Transport Assessment and Travel Plan are required for a range of uses including residential schemes.	Yes to address point 4

	4-The draft guidance also provides guidance on cycle parking requirements for residential and many non-residential developments. The document states that cycle parking provision set out in the SPD is expressed as minimum guidance to further encourage cycle ownership and more cycling trips to be undertaken. Appendix 1 of the draft guidance details the minimum cycle parking for non-residential uses, but there are no minimum guidance for residential developments. The inclusion of the appropriate levels of cycle parking for all types of development and associated infrastructure measures to reduce vehicle trip demand would be expected for all new developments.  5-National Highway supports Runnymede Borough Council's commitment to deliver sustainable development, thereby	4-Comments noted. A comment has been added below the table in Appendix 2 which sets out that: 'As a general point, in terms of requirements for cycle parking for residential schemes, for flats or houses without garages or gardens, a minimum of 1 cycle parking space should be provided for 1 and 2 bedroom units, and a minimum of 2 cycle parking spaces should be provided for units with 3 or more bedrooms'.  5-Support welcomed	
	managing down traffic demand on the SRN which this guidance will contribute to, by limiting parking spaces at destinations, and their commitment to work with partners to consult on potential developments coming forward within the borough.		
Ottershaw Neighbourhood Forum	General comments  1-The document is a confusing read and lacks clarity, particularly in the way the requirements are outlined in the Appendices. The document structure is not logical in some areas. There are sections for non-residential and residential car parking but this is not reflected e.g. for cycles. Appendix 1 and 2 are confusing with respect to secure cycle storage. Recommend this category is added as a separate column to Appendix 2. Whilst it is accepted that Appendix 3 is reproduced from SCC Guidance, it should be noted that it does not align with Appendix 1 and is therefore confusing.  2-The document fails to address any current or predicted growth and trends in the use of Cycles and E-bikes and does not include any supporting statistics. E-Bike ownership specifically drives requirements for secure cycle parking.	1-Format of document has been reviewed but is considered to be fit for purpose. However it is agreed that appendix 2 should include information on cycle parking requirements and text in this regard has now been added. It is appreciated that the uses are listed differently within the tables in appendices 1 and 3 however, the format is consistent with the tables included in the Surrey County Council Parking Guidance (November 2021) and as such, no change is proposed given that in the great majority of cases, the Council proposes to adopt the standards recommended by SCC for	Yes in response to points 1, 2, 3, 5, 6, 9, 11, 14, 22
	Additionally, assumptions with respect to cycle ownership per household should be addressed.	non residential uses and for EV charging.	

3-The document, whilst using other Surrey and national policies, guidance and plans as reference points, fails to predict any trends going forwards and is therefore out of date before it has been published. Efforts should be made to be predictive of change, even if this is merely taking past figures and replicating them going forwards. This would then offer more realistic policy foundations whilst also future proofing. If this is not done, the guidance already fails to address the move towards increased active travel such as cycling.

4-There does not appear to be a use type in appendix 1 to cover facilities such as leisure centres and sports clubs/grounds. Assume "Training Centres" in appendices includes schools. It is not clear this is the case. Also, car parks appear to be absent from the tables.

#### Specific comments

5-Ref Paras 2.12/2.13. Note that statistics need to be more predictive to add value and shape policy. A prediction to 2021 would be beneficial, using at least the same increase to that of the previous 10yrs. If you do not do this the SPD is already 11years out of date. If addressed this would increase parking allocation requirements. It should be noted that there is no visible downwards trend in car ownership yet, nor government policy to direct it.

6-Ref Para 2.15. Note that EV statistics and assumptions have also only been made to 2020, already 2 years out of date.

7-Ref Para 2.18. Query why there is no reference and as a minimum some assumptions for rail. Whilst it is accepted it is a regional/national issue itself, its availability/reach/capacity and affordability in the borough is a critical element which affects all other types of travel and associated assumptions and therefore any parking requirements also.

8-Ref Para 2.22. Note that security of cycle parking is critical given the rapid trend towards expensive E-bikes. Some consideration should be given for this.

2/3/5/6-It is agreed that this additional background information is useful. Additional text has been added into chapter 3 of the SPD on cycling (including e-bikes and cargo bikes), as well on likely future trends in car ownership.

4/23-At the end of the table in appendix 1, it is confirmed that Assembly and leisure and other uses (Class E/F.2/sui generis) will be subject to an Individual Assessment for both car and cycle parking. Specific guidance for parking standards for hospitals is already included.

Whilst the SPD does not contain a specific standard for an extension to a car park, in the majority of cases, the car park would be ancillary to another use and the primary use would guide the standard applied when considering any extension to the car parking area. Where a car park is not ancillary to another use, the table at Appendix 1 of the SPD confirms that where a use/type of development is not specifically listed in the table, an Individual Assessment for both car and cycle parking will be required in support of a planning application. This would propose a bespoke car parking scheme, appropriate to the use and/or its location, particularly when taking account of other policies and practices in place and which are associated with the operation of the development.

9-Ref Para 3.12. It is not clear why two sizes, 3m x 7m or 4m x 7m are stated as acceptable for garage dimensions when also accommodating cycles. This should be clarified. Presumably this is linked to the size of property/number of bedrooms i.e. occupants.

The standard does not seem to deal with secure cycle parking for developments which have smaller than minimum garages. There should be provision for this as a separate element in situations where this occurs.

A garage is intrinsically used as a ground floor "loft" by most people. Query whether the standard should recognise developments where properties do not have lofts as this would raise the parking requirement.

10-Ref Para 3.14. A minimum dimension would be beneficial for limited mobility/disabled spaces also.

11-Ref Para 3.16. Query why Addlestone Station is called out specifically from other stations. There are secure cycle parking needs not just at Addlestone but all the borough stations.

12-Ref Para 3.17. The statement here regarding town centres is contradicted by Appendix 1 which in many cases states that town centre cycle storage is "not necessarily required".

13-Ref Para 3.18. Query whether this type of statement is helpful for specific cases in this SPD. Surely a document hierarchy covers this.

14-Ref Para 3.19. EV for disabled given that many developments might only have one space, recommend 1 is stated min. Additionally, query why spaces for public are called out. Limited mobility employees will also have a requirement.

Schools and training centres are two different uses which fall under different use classes unless a school has a residential element to it. A school with no residential element would fall under use class F.1 (Learning and non-residential institutions). Training centres and residential schools and colleges fall under Use Class C2: Residential Institutions. The table at appendix 1 contains specific car and cycle parking standards for schools/colleges and children's centres close to the bottom of the final page of the table.

7-It is not considered that assumptions on rail are required as additional text has been added below the table in Appendix 2 to confirm that, 'It should be noted that in applying these standards, the accessibility to alternative sustainable modes of transport will be considered (including proximity to rail stations, and bus stops (combined with consideration of frequency of services in both cases) as well as key services and facilities (as set out in the Council's Sustainable Places Part 2 report) and where necessary, this may support an increase or decrease in overall on site parking provision'.

8-The Cycle parking section in chapter 3 already provides guidance on the provision of cycle parking in new developments, stating that there is an expectation that the parking provision will be safe and secure. The adequacy of cycle parking proposals will be considered against the guidance in the

15-Ref Para 3.20. It is worthy of note that the removal of school buses driving children to other means of active transport is a major driver for current change not addressed by policy.

16-Ref Para 3.22. Coaches are in common use by schools for many types of activity, not just travelling to and from school. It should therefore be an embedded development policy requirement to address this.

#### Appendix 1

17- Note that class E3 (Office) is driven more by the numbers of staff as opposed to the space, as such the allocation for this category may be far less than adequate.

18- Query the statement "not necessarily required" for those cycle storage categories that are town centre. Do not see why town centres are treated in a different manner. People often use cycles with other modes of transport to travel. As a minimum the statement should be clarified.

19-C3 Secure cycle storage for 2-bedroom units should be increased to 2 spaces assuming up to 4 occupants and likely minimum 2. 2 spaces for more than 3 bedroom is also low. Recommend 3 and 4+ Bedroom are dealt with separately.

#### Appendix 2

20-Query meaning of footnote 4 "As the default position, all visitor parking will be treated as unallocated unless agreed otherwise with the applicant". If this means that this allocation can be disregarded without justification, the provision for residential parking for a 2 bed home Suburban of 1 space is inadequate and should be 2 spaces.

21-There is no provision for secure cycle parking or even any footnote reference to draw out this requirement. Recommend this is included in this Appendix. Note there is an overlap with Appendix 1 UC C3.

#### Appendix 3

Parking Guidance SPD by the Development Management team. 9-It is proposed to amend the minimum garage sizes (where cycle storage is proposed) to 6x4 or 3.3 x7. This would allow a bike to either be stored at the side of a garage or at the front/rear of a garage.

10-This standard is already included in the document at paragraph 4.8 which is concerned with parking for disabled drivers.

11-Agreed. This reference has been deleted.

12/18- The reason why it is stated that parking is not necessarily required for 3 of the uses within appendix 1, is because the visitors/workers for these uses (pubs, restaurants, takeaways and similar uses) would be expected to use the extensive communal facilities that are available within towns.

13-Comments noted, however, it is considered that the wording in this paragraph is clear and fit for purpose. 14-Paragraph 3.19 has been amended to confirm that where disabled parking spaces are required within a development, at least 1 should be provided with an EV charging point. The reference to members of the public has been deleted.

15-Comment noted. However, the table at Appendix 1 confirms that for schools, for vehicular parking, a case-by-case assessment will be made when considering a planning application, linked to transport assessment/travel plan. In relation to cycle parking, the

22-It is not clear from this table whether the requirements are a standard for schools at appendix 1 minimum or a specific requirement. This should be clarified, states that a School Travel Plan will be e.g. one point for a 6 Bed house would be hopelessly required, to incorporate a site-specific inadequate. cycle strategy. 23-Although "sui generis" is included there appear to be This approach allows a bespoke car and important standard omissions, an example would be hospitals. cycle parking scheme to be developed, appropriate to the school in question and its location, and which considers the ability of people to walk, cycle or travel by public transport to the school, as well as the existence of other policies and practices which are in place and which are associated with the operation of the school (for example a school bus scheme in operation). 16- The Council has liaised with the Highway Authority regarding this point. Officers have been advised that it would not be practical/reasonable to expect provision for coaches for the occasions when during the school day they might use coaches for one off excursions/ trips/ days out. 17- There is no fixed planning requirement to restrict the numbers of employees in most E3 developments, whereas floor area is easily quantifiable and enforceable. 19-To avoid duplication with appendix 2, text about cycle parking has now been deleted from appendix 1 for C3 developments and relocated into appendix 2. This confirms that for flats or houses without garages or gardens, a minimum of 1 cycle parking space should be provided for 1 and 2 bedroom units, and a minimum of 2 cycle parking

spaces should be provided for units with

		3 or more bedrooms. These standards are in line with Surrey County Council recommendations and are considered appropriate minimum requirements. 20-This statement means that visitor parking would generally be expected to serve a development generally, rather than being attributed to specific units. However it should be noted that in response to other comments made on the draft SPD, that specific standards for visitor parking in new residential developments have been revisited and now been deleted. Replacement text on visitor parking is now included below the table in Appendix 2. 21-Agreed. Cycle parking standards have been added into appendix 2 and the duplicated text in appendix 1 deleted. 22-The EV charging point requirements are minimum standards, and this has now been clarified in Appendix 3.	
Private individual	I would like to ask why we are seeing car spaces being reserved for EV vehicles, as in Chertsey, when there are no charging points to accommodate these vehicles, surely the charging points alone should reserve these spaces, the planning department haven't decided to paint EV on the road as a way of making money from unsuspecting people, long before fulfilling their obligations, at the moment it looks as if those that can afford EV's are given priority and you're fining people that can't afford EV's to pay for their priority.	This comment is considered to go beyond the scope of the Parking Guidance SPD which sets the standards for EV charging points in new developments but does not deal with the installation of this infrastructure. It is unclear from the representation where the car parking spaces being referred to are located. If they are within a Runnymede owned car park, it is suggested that the representor contacts the Council at <a href="mailto:parking@runnymede.gov.uk">parking@runnymede.gov.uk</a> with any queries, if the spaces are on the street, it is suggested that the representor	

		contacts <a href="mailto:highways@surreycc.gov.uk">highways@surreycc.gov.uk</a> . If the spaces are within the premises of private businesses, the representor should contact the business directly.	
Surrey County Council	1-In considering Parking SPDs, the county council, as the local highway authority, takes into consideration two key issues of concern: firstly, whether any highway safety impacts might arise from the SPD; and secondly, whether the proposals might have implications for any sustainable transport strategies. This SPD raises no significant issues with regard to either of these concerns, but we have the following comments that you may find helpful.  2-Para 3.18: We are currently in the process of updating our EV charging standards. These should be released in the next month or so.  3-Para 3.20: In the last sentence, we would like to suggest that some additional wording is included to reference Travel Plans as well as School Travel Plans as follows:  Should any updated guidance be adopted by the County Council on Travel Plans or School Travel Plans following the publication of this SPD, it is this updated guidance that should be relied upon for Development Management decision making.	1-comment noted 2-Noted. These amended standards have been reflected in the final draft version of the SPD 3-Suggested amendment incorporated.	Yes-EV charging standards updated in line with latest SCC standards and text in para 3.20 amended in line with SCC suggestion.
The Chertsey Society	1-Overall we think that the SPD looks and will provide sensible guidance for developers.  2-However we strongly contest the recommended parking criteria given in Appendix 2. Whilst Government & SCC guidelines for Town Centre parking may be suitable for city centres and County Towns with good public transport provision, unfortunately for towns in Runnymede only one parking space for 2, 3 or 4 bedroom dwelling is totally inadequate as stated in Appendix 2, and will only lead to an increase in on-street parking in nearby residential roads, much to the irritation of local residents. The proposed parking provision should be at least 2 spaces for a 3 bed dwelling and 3 spaces for a 4 bed dwellings. We trust that the parking	1-Support welcomed 2- It should be noted that the standards recommended in this section are flexible 'guidelines' rather than more rigid 'maximum' or 'minimum' standards. This enables the locational characteristics of new residential development to be taken into account more closely, including consideration to be given to alternative modes of transport that exist in the locality. However, generally speaking, less parking is expected in town centre locations where alternative modes of	No

	and demonstrate the first and demonstrate levels where the test	tunnament and annually many as 19	Г
	guidance can be increased to realistic levels given the high	transport are generally more readily	
	level of car ownership in Runnymede.	available.	
		3-Support welcomed	
	3-We welcome the increased provision for charging points for	4-This matter goes beyond the scope of	
	Electric Vehicles ( EV's)	the Parking Guidance SPD. The design	
		of new highways is a matter for Surrey	
	4-Finally, we are concerned that there is no mention of the	County Council in their role as Highway	
	design of roads in new housing developments. Many existing	Authority. They would consider the	
	local roads are already nothing better than linear car parks with	acceptability of the design of any new	
	inadequate sight lines and passing places and many are now	roads as part of the planning application	
	becoming difficult for safe passage for emergency services. We	process and would assess against	
	regard this as a serious omission in the SPD and serious	relevant guidance (for example, the	
	consideration should be incorporated into the SPD to ensure	Surrey Design Guide and Technical	
	that roads in new developments do not become saturated.	Appendix, as well as Manual for	
		Streets).	
Turley on	1-Whilst the main direction and policy guidance contained	1-General support welcomed	Yes in
behalf of Vistry	within the document is supported, there are a number of	2-This matter has been revisited and the	response to
Homes	matters which require further consideration and clarity.	visitor parking standards are now	point 4,
		proposed to be deleted. In place of rigid	paragraph
	2-Visitor Parking	standards, the following additional text	3.18 has
	Appendix 2 of the draft SPD sets out the minimum visitor	has been added, 'Proportionate, well	been
	parking provision for new residential development within Use	integrated visitor parking is encouraged	amended.
	Class C3 and requires 0.5 spaces per dwelling for 2 and 3 bed	in residential schemes as appropriate'.	
	homes. Whilst we accept the need for and importance of visitor	This is largely in line with the guidance	
	parking within developments, we consider this provision to be	provided by Surrey County Council in	
	excessive.	their Vehicle, Cycle and Electric Vehicle	
		Parking Guidance for new development	
	Paragraphs 107 and 108 of the NPPF outline a set out five	from November 2021.	
	criteria that should be considered when setting local parking	3-Comments noted however if the SPD	
	standards for residential and non-residential development as	is adopted before a scheme is	
	well as stipulating that they should only be set where there is a	approved, the scheme in question	
	compelling justification that they are necessary for managing	should be in accordance with the SPDs	
	the local road network or for optimising density. However, we	in force at the time of the decision.	
	contend that this required evidence has not been	4-part d of policy SD7 confirms that,	
	demonstrated, thoroughly, within the draft SPD.	Development proposals will be	
		supported where they: 'd) Subject to	
	The visitor parking requirements contained in the adopted	feasibility (officer emphasis), incorporate	
	parking standards for other local authorities within Surrey have	electrical vehicle charging points in	
	been reviewed and a table of the results is included at	accordance with guidance issued by	

Appendix 1 of this letter. From this review, it is evident the requirements in the draft SPD are substantially higher than those in other local authorities and that there is a sensitive balance between providing parking quantum and achieving a high-quality design across developments. The majority of other authorities within Surrey do not stipulate a specific visitor parking requirement, rather they encourage a 'design-led' approach or indicate that the provision is at the Council's discretion.

In light of this, we consider that the requirement outlined in the draft SPD could hinder the prospects of high-quality design being achieved and ultimately the foundations of good placemaking which is contrary to paragraphs 107 and 108 of the NPPF. For example, the high provision of visitor car parking would diminish the prospects of being able to incorporate high levels of landscaping across a development site and could impede the ability to provide safe access to a site, particularly for emergency vehicles if visitor parking is required to be accommodated within primary access roads of the development. As such, we consider that further regard to the proposed patterns of movement within a development site is needed, to shape where visitor parking spaces can be best accommodated, with agreement sought between the Local Planning Authority and developer on the most appropriate provision for the scheme based upon the proposed layout and accessibility of the site.

As a result of the above, prior to the adoption of this SPD, we would welcome the visitor parking requirement being revisited.

# 3-Car parking guidance for residential development – Garages

Paragraph 3.12 of the draft SDP stipulates that, in residential schemes, parking spaces within garages will be counted towards the overall parking provision that the internal dimensions of each parking space measure, as a minimum, 6m x 3m, to ensure that a large modern car can be accommodated. Where garages are below this size, they will

Surrey County Council. Paragraph 4.19 of the SPD has been amended to include this policy wording for completeness.

	not be counted towards the parking requirement. It is further stated that where cycle storage is proposed within a garage, larger garages with dimensions of 3m x 7m or 4m x 7m would be considered appropriate. It goes onto say that for car ports/car barns the recommended minimum dimensions are 2.9m x 5.5m.		
	Whilst we appreciate this emerging position, we consider it imperative to be mindful of those schemes that are at an advanced stage of design evolution at the time of adoption of this SPD.		
	4-EV Charging Points Appendix 3 of the draft SPD outlines the guidance for electric vehicle charging points and indicates that, for residential development, houses will be required to have 1 fast charge socket per house and flats/apartments will be required to have 1 fast charge socket per flat (allocated and unallocated spaces). In addition, it stipulates that for commercial development 20% of available spaces will be required to be fitted with a fast charge socket plus a further 20% of available spaces to be provides with power supply to provide additional fast charge socket.		
	We recognise and understand the opportunities for securing EV charging points across new developments. However, due to site specific constraints of individual development sites, we consider that the policy wording should be re-phrased to state 'where possible' or there should be scope to agree an alternative provision as part of the planning application process.		
Woolf Bond Planning	1-It is appreciated that various sections of the document refer to the proposed car parking standards needing to be applied flexibly dependent upon the locational characteristics of new residential development. However, there are some notable departures from the Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development adopted and consulted upon by Surrey County Council as recently as 2021 and it is within this context that the below representations are prepared.	1-Comments noted. The Surrey guidance confirms on page 4 that:  **Application of this guidance** This guidance is intended to be flexible and used as considered appropriate by the 12 LPAs across Surrey. This is to ensure that parking requirements can	Yes in response to points 2, 3, 4 and 5.

2-First, the Surrey County guidance includes 4 locational categories referred to as 'Town Centre', 'Edge of Centre', 'Suburban' and 'Suburban edge/Village/Rural'. By comparison, the draft Borough guidance includes a 'Town Centre' and 'Suburban/Village/Rural' category only. Whilst a site on the edge of the Town Centre could reasonably replicate the parking provision of a site located inside a Town Centre, a site located on the edge of a settlement would have very different characteristics (and resulting parking demand). As an example, an annotated copy of the Chertsey policy map is provided below and indicates how a site could be located for example only 30 metres away from Chertsey train station but yet on the proposed approach would fall within the same 'Suburban/Village/Rural' category as a site located on the far edge of Chertsey, for example 1.5 Kilometres away from the train station. Indeed, in some circumstances a site located outside the town centre may actually be better related for example to Chertsey train station than a site located at the far end of Chertsey town centre and thus far further away from the train station.

The guidance included in Appendix 2 as drafted presently does not include any recognition of the potential accessibility merits of an edge of centre site and groups the 'Suburban/Village/Rural' area into a very wide category. It is recommended that a more precise definition of 4 separate locational characteristics more aligned with the County guidance would be appropriate so to recognise the very different locational merits between the two example sites illustrated on the plan above.

3-Second, the guidance suggests the need for provision of 3 spaces for a 4 bed home. This compares to the County guidance that refers to 2 plus spaces as a maximum provision. It is suggested that an approach consistent with the County guidance would be more appropriate especially given the

be completely tailored by the LPA to suit the unique circumstances of any given development proposal in accordance with its location.

Therefore, taking an alternative approach from that suggested by the Surrey guidance to reflect local circumstances is supported by SCC as being appropriate. It should be noted that Surrey Council has raised no objection through the public consultation on the Runnymede Parking Guidance SPD to its contents.

2-Given the flexible nature of the residential parking standards, it is considered that additional locational categories are not required. However, to address the point made, additional text has been added below the table in Appendix 2 to confirm that, 'It should be noted that in applying these standards. the accessibility to alternative sustainable modes of transport will be considered (including proximity to rail stations, and bus stops (combined with consideration of frequency of services in both cases) as well as key services and facilities (as set out in the Council's Sustainable Places Part 2 work) and where necessary, this may support an increase or decrease in overall on site parking provision'.

3- In relation to the proposed standard for 4+ bedroom dwellings, this has been reduced to 2 parking spaces in line with the recommendation in the Surrey Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development

locational differences between different parts of the respective locational characteristic areas.

4-Third, in relation to visitor parking the County guidance states that 'visitor parking is encouraged though is not always necessary'. By comparison, the proposed parking guidance suggests a need for 0.5 visitor parking spaces per 2 or 3 bed home. This is a very significant parking provision especially when considered across all locational characteristic areas. In reality the likelihood of 2 dwellings having 1 visitor at any 1 time is unlikely and therefore the proposed visitor parking provision requirements are disproportionate to true needs. Consequently, a requirement more aligned with the County standards is recommended namely that 'visitor parking is encouraged where appropriate though is not always necessary'.

5-Fourth, the adopted Local Plan includes a settlement focus towards meeting the Council's challenging minimum housing requirements with growth aspirations being largely directed towards the most sustainable large settlements in the Borough. The adoption of overly demanding parking standards could restrict the ability to meet these housing needs in the more accessible parts of the Borough. In the absence of any clear evidence (and actually the Borough having slightly lower car ownership levels than the County average), it is therefore recommended that amendments are made as outlined to align the proposed SPD with the County guidance. In addition, the residential parking standards should be clearly referred to as 'maximum' standards again consistent with the County approach.

guidance (November 2021), albeit it, in line with the other residential parking standards contained in the SPD, this will be applied flexibly to enable development proposals to respond fully and flexibly to the characteristics of their location, taking account of the availability of alternative means of travel in the area, car parking issues in the locality and to make the most efficient use of land. This proposed approach is considered to be largely in line with SCC's approach, given that 'note 1', which is applied to the 4+ bedroom standard and many of their other recommended residential parking standards states that, 'Where space permits, it may be appropriate to consider increased provision'. This would indicate that SCC also believes that a degree of flexibility is important in applying their recommended standards. 4-This matter has been revisited and the visitor parking standards are now proposed to be deleted. In place of rigid standards, the following additional text has been added, 'As a general point, proportionate, well integrated visitor parking is encouraged in residential schemes as appropriate' This is largely in line with the guidance provided by Surrey County Council in their Vehicle, Cycle and Electric Vehicle Parking Guidance for new development from November 2021.

5The Council is content with the flexible approach proposed in the SPD to enable development proposals to

		respond fully and flexibly to the characteristics of their location, taking account of the availability of alternative means of travel in the area, car parking issues in the locality and to make the most efficient use of land. The residential parking standards recommended by Surrey County Council also have a degree of flexibility with half of their standards being supported by 'note 1' which states that 'Where space permits, it may be appropriate to consider increased provision'.  The Council is committed to keeping the SPD under review and a review chapter has been added at chapter 4 of the document. This sets out that the SPD will be reviewed 3 years post adoption. This review could include consideration of matters such as whether it is appropriate to move to maximum parking standards for new residential schemes.	
Natural England	While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major impacts on the natural environment. We therefore do not wish to provide specific comments, but advise you to consider the following issues:  Biodiversity enhancement This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraphs 8, 72, 102, 118, 170, 171, 174 and 175 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures	There is no specific guidance contained in the SPD on any of the matters outlined, and indeed the Parking SPD is considered to not be the most appropriate document to cover such matters. However the Council's Green and Blue Infrastructure SPD and Runnymede Design SPD does provide guidance on these matters and how they should be addressed in new developments which come forward in the Borough.	

to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.

### Landscape enhancement

The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.

## **Protected species**

Natural England has produced Standing Advice to help local planning authorities assess the impact of particular developments on protected or priority species.