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Sangeeta Ratna  
TANDRIDGE DISTRICT COUNCIL  
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STATION ROAD EAST  
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25 July 2022

Dear Sangeeta Ratna

**APPLICATION NO.** TA/21/1800  
**SITE:** 381 Croydon Road, Caterham, Surrey, CR3 6PN  
***Response to DHA Review***

The following response is produced by Surrey County Council in its capacity as County Highway Authority in response to the two reports produced by DHA relating to the above Planning Application. The County Highway Authority has reviewed the DHA reports following Tandridge DC's request for a review of the information submitted by Aldi under Planning Application 2021/1800. We have considered the conclusions of the report and do not consider that the findings of the DHA report materially alter the conclusions of the County Council's previous response. It is considered that the conclusions raised by DHA have previously been considered by SCC and largely addressed by Aldi's Transport Consultants – Connect Consultants.

#### **Parking Methodology**

DHA have acknowledged in their initial report that some of the comparator sites used in one part of Connect Consultants parking assessment methodology are located in areas with a greater residential density, which the County Council also acknowledges. However, it is noted that DHA agree that the selection of other Aldi sites used for the parking accumulation survey can be considered appropriate given the Aldi business model and the accessibility of each of the sites to the strategic highway network. On this point there appears to be agreement between Connect Consultants, SCC and DHA.

In DHA's second note a concern has been raised that data used in the Parking Accumulation work submitted by Aldi was produced using data collected during December 2021 and early 2022. DHA consider that during this period, travel and shopping behaviours may have been affected by the Covid-19 pandemic. The County Council accept that since the onset of the Covid-19 pandemic in early 2020, travel behaviour has been significantly altered and disrupted. Whilst it is accepted that consumers may have altered their behaviour in December 2021 and early 2022 in response to a peak in infections locally and nationally, there were no legal restrictions on movement of activity in place at this time. December is traditionally a busy period for food retail trips in the lead up to Christmas and is therefore a good month to undertake a robust assessment of parking accumulation.

This application was initially submitted in October 2021, and the CHA has had to adopt a pragmatic approach to survey data since the onset of the pandemic. With uses such as Discount food retailers, customer behaviour has changed significantly over the past decade, and recent data is therefore important when estimating the future travel behaviour. However, this has to be balanced against the disruption caused by the Pandemic. On balance, the data submitted from this period – in a typical busy period for food retailers and outside any periods of legal restriction – was considered to

be the best data available. The CHA acknowledges that repeating these surveys now may help verify how 'typical' the recorded parking accumulation is likely to be, should the Committee be uncomfortable with the data reported to date.

DHA have identified that the parking accumulation methodology set out in the Planning Application estimates the number of vehicles on site at the end of each hour, and that there may be peaks within a peak that are not identified by this methodology. SCC acknowledge this finding of the DHA report. If it is considered appropriate the consultant could use a number of comparator sites to do a full manual parking accumulation exercise to determine the peak parking demand using half-hourly or 15 minute intervals.

However, SCC consider that this additional work may have limited benefit as it is unlikely to provide sufficient evidence to reach a different conclusion on the acceptability of the application. If a short peak were identified where parking demand were to exceed parking supply, it may be difficult to demonstrate that this would create a significant highway safety or capacity implication, such that a refusal reason could be substantiated.

DHA have asserted that staff parking has not been properly accounted for in the Parking assessment submitted with the Planning Application. However, SCC considers that staff arrivals and departures have been accounted for in the parking accumulation exercise that has already been undertaken and are therefore already factored into the assessment.

### **Parking Capacity**

The initial DHA report highlights a concern that the proposed on-site parking provision will be insufficient to accommodate typical weekend peak demand. The parking accumulation estimate submitted by Connect Consultants estimates the Saturday weighted average maximum reaches 61 vehicles and increases to 65 vehicles on a Sunday, thereby exceeding the proposed car park capacity of 64 vehicles by one vehicle. This information was acknowledged by SCC prior to the provision of our response to the Planning Application. During the consultation period of the application, SCC requested amendments to the car park layout, which were duly factored in to the final layout of the scheme. The CHA considers that the revised layout provides sufficient circulating space within the car park to accommodate any over demand, and the location of the store entrances will incentivise drivers to favour the spaces further from the access to the highway. Therefore it would be unlikely to result in queuing on the highway and given the forward visibility on Croydon Road, it is considered that minor queuing would be unlikely to result in highway safety issues. It is considered likely that drivers would continue southbound to Lidl if there was any queuing.

Whilst the DHA report expresses concern that the capacity of the car park is estimated to have a shortfall of one space in the weekend peak hour, the County Highway Authority and Local Planning Authorities must make a judgement on whether a concern is likely to have a severe or significant impact on the operation or safety of the highway to justify a refusal, in accordance with the National Planning Policy Framework. The CHA have assessed the application against this threshold and consider that the application is unlikely to exceed this.

The second DHA report highlights issues with parking at the East Barnet Aldi store, which has been used by Aldi's consultant as a comparator store in their parking accumulation estimate. The CHA acknowledges these issues, and is aware of other Discount stores within Surrey and beyond which have similar issues. This issue is, in part, caused by the layout of the car park at these stores, where there is no space within the car park to circulate, and the first row of spaces is immediately adjacent to the highway access. As a result, vehicles wait near the access and there is low capacity for

queuing of vehicles within the site. Following discussions between SCC and the Applicant, the application under consideration includes a revised car park layout which would allow for considerably more stacking within the site and a more user-friendly flow around the site.

### **Parking Controls**

The DHA report has recommended that parking controls should be investigated in the proximity of the development site to mitigate any overspill parking demand. There are existing parking controls in place on Croydon Road within the vicinity of the site during peak times. However, the CHA are happy to consider imposing a condition to secure a contribution/post-occupation parking review. The Planning Committee may wish to consider recommending a Section 106 obligation which requires that the developer to fund and lay out amended parking restrictions on Croydon Road in the vicinity of the site, in accordance with a plan to be agreed in writing with SCC.

### **Delivery Vehicles**

DHA have suggested that the swept path analysis of delivery vehicles negotiating the site is provided so that it can be verified. The CHA does not have the software to verify this and we have to accept that the professional consultant has used appropriate parameters. This issue was queried by SCC with the consultant and they demonstrated that they had allowed a 1m buffer around the vehicle in most dimensions and the CHA felt that this was reasonably robust.

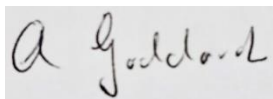
However, it is agreed that the consultant could provide a further swept plan analysis to DHA to verify that the reversing manoeuvre into the loading bay is feasible in practice should this be considered necessary.

### **Conclusion**

Overall, the County Highway Authority broadly accepts the conclusions of the DHA report, but considers that the concerns identified have been adequately considered in our previous response to the planning application. Whilst there may be limitations and constraints with the development, the NPPF sets a high bar for refusing development proposals on the basis of highway impact, and in considering the evidence presented, the County Highway Authority do not believe that this threshold has been exceeded, subject to the conditions set out in our previous response.

Could this full response please be reproduced on the late sheets for the Planning Committee on Thursday evening.

Yours sincerely

A handwritten signature in black ink that reads "A Goddard". The signature is written in a cursive style and is contained within a light grey rectangular box.

Angela Goddard  
Transport Development Planning Officer