

# Croydon Road, Caterham

## Technical Note - Highways

This technical note has been produced to provide an independent review of the highway case that has been presented and assessed in support of planning Application TA/2021/1800 for a new Aldi store at Croydon Road, Caterham. Entran Ltd have got extensive experience of negotiating and promoting food store applications.

On review, we consider the information prepared by Connect is robust and that DHA's appraisal does not constitute a defensible reason for refusal. We expand as follows.

Connect have used a weighted average for car park accumulation rather than just the mean. This is based on observed, empirical and directly relatable surveys and is therefore a robust form of assessment. Even using this robust assessment, the proposed car parking provision exceeds demand on each weekday, exceeds demand on a Saturday by 5% but provision is less than demand by one vehicle on a Sunday. It should be noted that the *average* car parking accumulation on a Sunday is still below the proposed parking provision, so it is only the 'weighted average' that results in an exceedance of one vehicle. Connect have stated that this nominal and infrequent capacity exceedance would not have a material impact on the surrounding highway network. We concur with that view.

DHA have referred to Tandridge DC's parking standards and Surrey CC's parking standards. It should be noted that TDC's parking standards were written in 2012 whereas SCC's parking standards were written in 2021 and reflect the 2019 NPPF guidance.

Paragraph 107 of NPPF states that parking standards should take account of the accessibility of the development location. TDC standards make no allowance for location whereas SCC standards do. The SCC standards are therefore more reliable and compliant with national policy.

The DHA Transport Technical Notes are not numbered, so for ease of reference we will just refer to them as DHA TN June 2022 and DHA TN July 2022.

DHA TN June 2022 para 1.2.8 says SCC maximum standards allow for parking up to either 54 or 97 spaces (allowing for 25% reduction in suburban area) depending on the ratio applied to the floor area. This is not the range within which parking should be provided, it is the maximum parking allowed. Notwithstanding this, the proposal includes 64 spaces which is not 'at the lowest end of these thresholds' as suggested by DHA.

We note that the 54 figure relies on using the SCC standard for 500sqm to 1000sqm (which is lower than the proposed GFA); however, we understand that was the approach approved for a recent Lidl town centre consent. DHA suggest that the two stores are not comparable as the Lidl was town centre whereas Croydon Road is relatively suburban; however, that is already taken into account in the percentage deduction recommended by the SCC standards, it does not affect the initial assessment of parking demand. Either way, the proposed 64 spaces would exceed that lower figure.

It is very important to note that the SCC standards state: *“Parking proposed at levels below the maximum standard will not be objected to, other than in exceptional circumstances where there are significant implications for road safety.”* It is clear from the Connect appraisal that this proposed development cannot be reasonably be described as exceptional and there would not be significant implications for road safety.

The SCC position is consistent with NPPF para 111 which states: *“ Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”.*

DHA TN July 2022 uses Street view images for East Barnet and states at para 1.2.7 that *“This serves to reinforce the importance of providing sufficient on-site parking capacity, particularly in locations such as that proposed in this case, where appropriate off-site parking opportunities (e.g. public car parks) are unavailable. Indeed, given the nature of the local highway network around the proposal site, it is not considered that any degree of overspill would be acceptable from a highway safety or amenity perspective”*

This position is unreasonable. There is available on-street parking to the north and south of the site in the form of limited waiting (1hour, Mon-Sat 0830-1800) parking bays. No parking stress surveys have been undertaken but the Google streetview images show available spaces in one or both locations in 2018, 2019 and 2021. It is therefore inappropriate to suggest that ‘any’ overspill would have a highway safety implication. We recognise that Google streetview only provides a snapshot of highway conditions, but the same can be said of the images of Aldi East Barnet presented by DHA in TN July 2022. The fact remains that there are parking spaces available regularly on-street, close to the site. The frequency of overspill parking appears to be very low (even using higher weighted averages) and the level of overspill also appears to be very low, so the use of existing available parking spaces in these circumstances seems perfectly reasonable.

DHA TN June 2022 already suggests possible mitigation at 1.3.10 in the form of Double Yellow lines and/or raised kerbs and bollards, so it is self-evident that the residual effects after mitigation would not have an unacceptable effect on highway safety and would certainly not have a severe impact on operational capacity. On this basis, any such nominal residual effects would not constitute a defensible highway reason for refusal.

Finally, DHA have suggested that the on-site turning for HGV deliveries is tight and would give way to highway safety concerns. We concur that the turning space is quite constrained; however, this arrangement is common to Aldi stores throughout the country and operates perfectly safely. All Aldi drivers are very familiar with this form of arrangement and make multiple deliveries each day during store opening hours in circumstances very similar to this proposed arrangement. We have discussed this form of servicing arrangement with many local authorities over many years, including at appeal, drawing on a great deal of safety evidence and statistics, and we are satisfied that this form of arrangement can operate safely.