

SPELTHORNE LOCAL PLAN EXAMINATION

INFRASTRUCTURE AND DELIVERY POLICIES

Main Matter 16 – Infrastructure and Delivery (Policies ID1 and ID2)

Are the requirements of the Infrastructure and Delivery, Sustainable Transport for New Developments policies justified by appropriate available evidence, having regard to national guidance, and local context?

Do policies ID1 and ID2 provide a clear direction as to how a decision maker should react to a development proposal and are they likely to be effective?

As set out in our representations we are concerned that part 2 of this policy is too rigid and does not allow sufficient flexibility to the decision maker to depart from this policy in areas that are well served by public transport. The approach suggested by the Council could be counter-productive in its aim of promoting more sustainable forms travel. There are locations in the Borough that are well served by public transport where it would be appropriate for parking to be delivered at much lower rates in order to discourage car use rather than promote it.

The HBF recommends that rather than require development to deliver either 1 or 1.25 parking spaces per dwelling the Council should set out in policy that in locations well served by public transport a lower level of provision will be acceptable. The Council states in paragraph 9.16 of the supporting text that the policy does not preclude developers from bring forward car free development but given that these statements are made in the supporting text and makes no reference to wider flexibility and the circumstances when these may be applied it cannot be considered an effective in supporting new development that seeks to prioritise sustainable and active forms of travel.



The proposed flexibility to parking standards will also mean that development in more sustainable locations but where viability is challenging will be able to deliver at densities that make such sites deliverable without amending other policies. The Council's viability evidence notes at paragraph 3.2.4 and 3.2.5 that viability on PDL sites is more challenging especially those faced with high EUVs and potentially higher development costs – such as delivering underground or undercroft parking in order to meet parking standards. Therefore, in order to maximise delivery on sites with good access to public transport and encourage the use of sustainable travel options we would recommend the Council set out in policy where it considers it appropriate to deliver parking standards below those recommended in the Council's SPD.

The Council should also remove part 1(b). As we outlined in our comments on PS1 the standards for electric vehicle charging points are now included in part S.

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