Land South of Kingfield Road and East of Westfield Avenue, Westfield Avenue, Woking

Highways and Transport Evidence
on behalf of Woking Borough Council

of

David Gwyn Lewis BSc(Hons) MSc (Hons) MCIHT

PINS Reference: APP/A3655/W/20/3265969
LPA Reference: PLAN/2019/1176

motion

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1.0 Introduction – Qualifications and Experience

1.1 My name is David Gwyn Lewis and I am a Regional Director at Motion Consultants Limited. I hold a Master Degree in Transport Planning and Engineering and am a member of the Chartered Institution of Highways and Transportation and the Transport Planning Society. I have over 14 years' experience in the field of transportation planning and traffic engineering.

1.2 I have extensive experience of highways and transport planning across the development planning sector and have prepared Transport Assessments, Statements and Studies supporting planning applications across the UK. My experience includes a period in the transport development planning teams of WYG and RPS. I have worked for Motion Consultants Limited for 10 years since February 2011.

1.3 Motion specialises in advising developers and professionals in the development field on all matters concerning transportation, highways, traffic and road safety and our clients comprise a wide variety of private and public-sector organisations.

Scope of Evidence

1.4 My evidence is provided on behalf of Woking Borough Council (WBC). The evidence which I provide in this document has been prepared in accordance with the guidance of my professional institution, the Chartered Institution of Highways and Transportation. Where opinions are expressed, these are my own professional and sincerely-held opinions.

1.5 A planning application was submitted to WBC in December 2019 (Planning Application Ref: PLAN/2019/1176) for development proposals comprising:

"Redevelopment of site following demolition of all existing buildings and structures to provide replacement stadium with ancillary facilities including flexible retail, hospitality and community spaces, independent retail floorspace (Classes A1/A2/A3) and medical centre (Class D1) and vehicle parking plus residential accommodation comprising of 1,048 dwellings (Class C3) within 5 buildings of varying heights of between 3 and 11 storeys (plus lower ground floor and partial basement levels) on the south and west sides of the site together with hard and soft landscaping, highway works, vehicle parking, bin storage, cycle storage, plant and other ancillary works including ancillary structures and fencing/gates and provision of detached residential concierge building."

1.6 Planning permission was refused at planning committee on the 23rd June 2020 with the Decision Notice listing five reasons for refusal. One reason for refusal relates to highways and transport matters, as follows:

"Reason 4 - The proposed development would provide insufficient on-site car parking to serve the stadium and medical centre uses and has failed to demonstrate that the level of on-site parking proposed for these uses would not result in the displacement of vehicle parking onto nearby streets, thereby exacerbating existing pressure for on-street car parking, particularly during match days. The proposed development is therefore contrary to Policy CS18 of the Woking Core Strategy (2012), SPD Parking Standards (2018) and Section 9 of the National Planning Policy Framework (NPPF)."

1.7 My instruction in relation to the Appeal was received on 25th March 2021 and prior to instruction I had no involvement with the planning application and was not involved with the proposals at the planning application stage. However, prior to my instruction in relation to the Appeal, I reviewed the associated transport documentation in relation to the application in order to familiarize myself with the proposals and matters raised within the reasons for refusal.

1.8 I consider the fourth reason for refusal in the following sections of my evidence where I demonstrate that the Proposed Development provides insufficient parking to serve the proposed stadium and medical centre uses and has failed to demonstrate that this would not result in the displacement of vehicle parking onto nearby streets. To this extent the Proposed Development will result in high levels of on-street parking stress on match days which will result in a detrimental impact on parking conditions and harm to highway safety and residential amenity.

1.9 On the basis of my evidence, I am of the professional opinion that the Proposed Development does not accord with the Woking Core Strategy, SPD Parking Standards (2018) and the National Planning Policy Framework and the Borough Council were therefore correct to refuse planning permission for the reason set out in reason for refusal 4.

2.0 Planning Policy

2.1 The key policy and guidance documents that set the context for the Proposed Development comprise:

- National Planning Policy Framework (June 2019);
- Woking Borough Council Core Strategy (October 2012);
- Woking Borough Council SPD Parking Standards (April 2018); and,
- Surrey County Council Vehicular and Cycle Parking Guidance (January 2018).

National Planning Policy Framework

2.2 The National Planning Policy Framework (NPPF) June 2019 sets out the Government's planning policies for England and how they are expected to be applied and is an important material consideration.

2.3 The NPPF presumes in favour of sustainable development and at Paragraph 102 states:

"Transport issues should be considered from the earliest stages of plan-making and Development Proposals, so that:

a) the potential impacts of development on transport networks can be addressed;

b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;

c) opportunities to promote walking, cycling and public transport use are identified and pursued;

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places."

2.4 In relation to the location of development, providing a choice of transport modes and the variation between urban and rural sites, the NPPF states at Paragraph 103 that:

"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."

2.5 In relation to parking provision is Paragraph 105 of the NPPF states:

"If setting local parking standards for residential and non-residential development, policies should take into account:

a) the accessibility of the development;

b) the type, mix and use of development;

c) the availability of and opportunities for public transport;

d) local car ownership levels; and

e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles."

2.6 In relation to parking, Paragraph 106 of the NPPF states that:

"Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists."

2.7 Paragraph 108 of the NPPF details how the assessment of development proposals should be considered and states:

"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users; and

c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."

Woking Borough Council Core Strategy

2.8 The WBC Core Strategy was adopted in October 2012 and is the key Local Development Document (LDD) and provides the local strategic planning policy context within which all the other LDDs will be prepared.

2.9 Policy CS18 of the Core Strategy details the Councils policies with regard transport, accessibility and parking and states:

"CS18: Transport and accessibility

The Council is committed to developing a well integrated community connected by a sustainable transport system which connects people to jobs, services and community facilities, and minimises impacts on biodiversity. This will be achieved by taking the following steps:

- *Joint working with key stakeholders through the Transport for Woking Partnership to ensure that the principal objectives and overall vision of the Surrey Local Transport Plan are met.*
- *Locating most new development in the main urban areas, served by a range of sustainable transport modes, such as public transport, walking and cycling to minimise the need to travel and distance travelled.*
- *Ensuring development proposals provide appropriate infrastructure measures to mitigate the adverse effects of development traffic and other environmental and safety impacts (direct or cumulative). Transport Assessments will be required for development proposals, where relevant, to fully assess the impacts of development and identify appropriate mitigation measures. Developer contributions will be secured to implement transport mitigation schemes.*
- *Requiring development proposals that generate significant traffic or have significant impact on the Strategic Road Network to be accompanied by a travel plan, clearly setting out how the travel needs of occupiers and visitors will be managed in a sustainable manner.*
- *Supporting proposals that deliver improvements and increased accessibility to cycle, pedestrian and public transport networks and interchange facilities. In particular, proposals to improve easy access between Woking Rail Station and the town centre will be encouraged.*

- *Implementing maximum car parking standards for all types of non-residential development, including consideration of zero parking in Woking Town Centre, providing it does not create new or exacerbate existing on-street car parking problems. Minimum standards will be set for residential development. However, in applying these standards, the Council will seek to ensure that this will not undermine the overall sustainability objectives of the Core Strategy, including the effects on highway safety. If necessary, the Council will consider managing the demand and supply of parking in order to control congestion and encourage use of sustainable transport.*
- *Ensuring that changes made to transport infrastructure or increase in road vehicle usage will not have an adverse effect on the integrity of an SPA, SAC or Ramsar site.*
- *The Proposals Map and the Site Allocations DPD will safeguard land to deliver schemes that are adopted by the County Council to support the Core strategy."*

Woking Borough Council Parking Standards Supplementary Planning Document

2.10 The WBC Parking Standards Supplementary Planning Document (SPD) was adopted in April 2018 and sets appropriate car and cycle parking standards for all forms of development.

2.11 The WBC Parking Standards SPD states that:

"The Council is committed to developing a well integrated community with a sustainable transport system which connects people to jobs, services and community facilities whilst minimising impacts on biodiversity. Parking is a key component of this; it has the potential of influencing the way people travel, the efficient use of land, highway safety, as well as the quality of the built environment.

The purpose of this Supplementary Planning Document (SPD) is to set appropriate car and cycle parking standards for all forms of development to balance a wide set of aims including:

- *influence a shift in behaviour towards sustainable modes of transport*
- *efficient use of land*
- *ensure a high quality built environment and development sites*
- *control congestion*
- *ensure highway safety*
- *minimise pollution"*

2.12 On the basis of the above, the Woking Parking Standards SPD highlight that car parking is a key component influencing highway safety and that the provision of appropriate car parking is necessary to ensure highway safety.

2.13 Section 4.3 of the Parking Standards SPD states that:

"*All parking levels relate to gross floor area and are recommended as a maximum unless otherwise stated.*

- *Provision for uses marked "individual assessment/justification" will require their own justification and the inclusion of parking management plans, travel plans and cycle strategies where appropriate. It should be demonstrated that demand for parking is either met on site or mitigated and managed as appropriate"*

2.14 The maximum parking standards for the proposed uses set out within the WBC Parking Standards SPD are summarised at Table 2.1.

	Vehicles Parked
Stadia	1 car space per 15 seats OR individual assessment/ justification
Doctor's Practices	1 car space per consulting room. Remaining spaces on individual assessment

Table 2.1 WBC Parking Standards

Surrey County Council Vehicle and Cycle Parking Guidance

2.15 The Surrey County Council (SCC) Vehicle and Cycle Parking Guidance was adopted in April 2018 sets appropriate car and cycle parking standards for all forms of development within the County.

2.16 The maximum parking standards for proposed uses set out within Vehicle and Cycle Parking Guidance are summarised at Table 2.2.

	Vehicles Parked
Stadia	1 car space per 15 seats OR individual assessment/ justification
Doctor's Practices	1 car space per consulting room. Remaining spaces on individual assessment

Table 2.2 Surrey County Council Parking Standards

2.17 In terms of uses that require individual assessment, the SCC guidance advises that

"Provision for uses marked "individual assessment" will require their own justification and the inclusion of parking management plans, travel plans and cycle strategies where appropriate."

and

"Where "individual assessment" is required, it should be demonstrated that demand for parking is either met on site or mitigated and managed as appropriate."

Summary

2.18 It is evident that the policies set out within the NPPF, Woking Local Plan and WBC Parking Standards SPD and SCC Vehicle and Cycle Parking Guidance reflect a presumption in favour of sustainable development and require major development include appropriate infrastructure to mitigate adverse impacts of development. The policies also confirm that parking is an integral part of the design of schemes and contributes to making high quality places and influencing highway safety. The policies identify that appropriate parking for development is provided, in accordance with local standards. The policies confirm that parking demand should either be met on site or mitigated and managed as appropriate.

3.0 Proposed Development & Parking Provision

3.1 In this section of my evidence, I will consider the proposed uses in respect of the stadium and medical centre, the parking provision proposed for those uses and the relevant adopted car parking standards.

Proposed Stadium Car Parking

3.2 The current stadium for Woking Football Club has a capacity of 5,725 spectators, based on the Transport Assessment supporting the planning application.

3.3 The Proposed Development includes a replacement football stadium with a capacity of 9,026 spectators.

3.4 As set out in Section 2 of my evidence maximum parking standards for the proposed stadium are set out in the WBC 'Parking Standards' SPD and the SCC 'Vehicular and Cycle Parking Guidance' document. Both the WBC and SCC parking standards advise the following maximum parking for stadium use:

"1 car space per 15 seats OR individual assessment/justification"

3.5 Based on the proposed stadium capacity of 9,026 spectators the WBC and SCC parking standards would allow the provision of 602 car parking spaces for the proposed stadium uses.

3.6 The Appellant is proposing to provide a total of 60 car parking spaces for the stadium use. The level of car parking proposed for the stadium is significantly below the maximum standards allowed under the WBC and SCC guidance and equates to just 10% of the maximum provision allowed.

3.7 The Transport Assessment supporting the application states that:

"A total of 60 car parking spaces and one coach parking spaces will be provided for the stadium use. The car parking spaces are to be located adjacent to the northern stand of the stadium."

3.8 The Illustrative Masterplan for the Proposed Development is included at Appendix J of the Appellants Transport Assessment and a copy of this is included at Appendix A of my evidence and an extract of the Masterplan is shown at Image 3.1 below. The illustrative Masterplan shows a parking area of 66 spaces to the north east corner of the stadium. I note that this is inconsistent with the indicated provision of 60 parking spaces, as detailed within the text of the Transport Assessment and, whilst not necessarily significant, it is unclear whether this area also includes parking for other uses than the stadium or whether there is an inconsistency in the number of spaces proposed for the stadium.

Image 3.1: Extract from Site Masterplan

3.9 It is acknowledged that the WBC and SCC adopted standards for stadium uses are maximum standards and provision below the maximum standard could potentially be acceptable and, in accordance with the WBC and SCC standards, would require "*individual assessment/ justification*". SCC and WBC standards state that:

WBC Parking Standards SPD

"Provision for uses marked "individual assessment/justification" will require their own justification and the inclusion of parking management plans, travel plans and cycle strategies where appropriate. It should be demonstrated that demand for parking is either met on site or mitigated and managed as appropriate"

SCC Vehicular and Cycle Parking Guidance'

"Where "individual assessment" is required, it should be demonstrated that demand for parking is either met on site or mitigated and managed as appropriate."

3.10 On the basis of the WBC and SCC policies, parking provision for a stadium use should either be based on maximum standards or an individual assessment to demonstrate that either demand for parking is met on site or is appropriately managed and mitigated off site.

3.11 In terms of the management and allocation of the stadium parking bays on a matchday, Paragraph 5.77 of the Planning Statement states that:

"A separate surface car parking area of approximately 60 spaces will be provided to the north east of the Stadium. This will be strictly for match officials and disabled visitors on matchdays and not used for general car parking. "

3.12 Paragraph 5.7 of the Event Management Plan, included at Appendix N of the Transport Assessment, states that

"On match days on-site car parking will be reserved for players, VIPs and disabled users."

3.13 Clearly there are some minor differences between the Appellant's Event Management Plan and Planning Statement with regard who will have access to the stadium car parking on matchdays, however, based on the information provided, it is understood that access to on site parking on matchdays will be limited to players, matchday officials, VIPs and disabled visitors.

3.14 No information is presented in the Transport Assessment or Event Management Plan as to how the 60 on site parking spaces will be managed and allocated between players, matchday officials, VIPs and disabled visitors and no analysis is presented to demonstrate that 60 parking spaces is sufficient to accommodate parking demand associated with players, matchday officials, VIPs and disabled visitors.

3.15 No on site parking is to be provided for spectators, other than VIPs and disabled users, therefore the majority of spectators accessing the site by car will need to park off site.

3.16 Furthermore, it is evident that matchday staff at the stadium including catering staff, security, stewards and grounds staff, will not have access to the stadium car park and any staff driving to site on matchdays will need to park off site. The Transport Assessment supporting the planning application provides no detail of the number of staff that would be on site on a matchday or the proportion of those that will drive to the site and require to park off site. Table 6.24 of Chapter 6 of the Environmental Statement (socio-economic) indicates that estimated employment associated with stadium is 30 FTE (Full-Time Equivalent) staff. However, is evident that the majority of match-day staff including stewards, security and hospitality will not be employed on a full-time basis and would only be required on matchday. No evidence is provided by the Appellant on the expected number of staff on site on a matchday.

3.17 Table 8.20 of the Appellant's Transport Assessment details of the number of spectators that are expected to arrive at the site by various modes of ravel including arriving at the site as a car driver. The Appellant's Assessment concludes that the proposed stadium will result in 2,959 spectators driving to the stadium by car, with a further 2,959 spectators arriving as a car passenger.

3.18 WBC and SCC guidance states that, where parking is being assessed on an individual basis, the parking provision should either accommodate "*demand for parking onsite*" or be "*mitigated and managed as appropriate*".

3.19 It is evident that the on site car parking associated with the proposed stadium does not accommodate "*demand for parking onsite*" and will result in a significant amount of off site car parking associated with spectators and staff who do not have access to any on site. Where parking is likely to occur off site the WBC and SCC policies require that this be assessed and "*mitigated and managed as appropriate*".

3.20 My evidence will demonstrate that an appropriate individual assessment of off site car parking demand associated with the proposed stadium has not been undertaken and the Appellant has not demonstrated that demand for off site stadium car parking will managed and mitigated appropriately, as required by WBC and SCC parking standards.

Coach & Mini-bus Parking and Drop-Off

3.21 The Appellants Transport Assessment confirms that the Proposed Development will provide one coach parking space which will be situated within a turning head at the northern end of the site and Paragraph 7.20 of the Transport Assessment states that:

"the coach parking space will be located in the turning head at the east of the stadium (and will only be used for the team coach on matchdays - this will not impede emergency vehicle access)".

3.22 It is evident that the proposed coach parking bay is provided solely for the use of one of the matchday teams, assumed to be the away team, and no coach parking facilities are provided for the spectators. The proposed stadium therefore makes no allowance for spectators seeking to arrive by coach or mini-bus and therefore are no opportunities provided on site for a coach or mini-bus to park or drop off spectators.

Disabled Accessible Car Parking

3.23 The WBC 'Parking Standards' SPD provides guidance on the appropriate provision and sizing of accessible parking bays.

3.24 Para 4.4 of the WBC 'Parking Standards' states that:

- *"Parking for disabled drivers should be designed and provided in accordance with the latest appropriate guidance."*

3.25 The Appellants Transport Assessment indicates that accessible parking for the proposed stadium will be provided within the overall allocated of 60 spaces being allocated to the stadium. The Appellants Event Management Plan states that 7 spaces within the 60 spaces will be allocated as accessible spaces.

3.26 Paragraph 4.4 of the WBC 'Parking Standards' SPD also provides guidance on the appropriate dimensions if accessible parking bays and states that:

"Spaces should have minimum dimensions of 4.8m x 2.4m with additional space:

i. Where bays are parallel to access aisle and access is available from the side and extra length of at least 1.8m, or,

ii. Where bays are perpendicular to the access aisle, an additional width of at least 1.2m along each side to provide an access zone, where bays are adjacent this space can serve both sides. There should also be a 1.2m wide safety zone to the rear for boot and rear hoist access.

3.27 Based on the WBC guidance it is evident that in addition to the parking bay dimension of 4.8 metres in depth by 2.4 metres wide, any accessible parking should include a 1.2 metre wide access zone each side of the parking bay and a 1.2 metre wide safety zone to the rear of the parking bay for boot and rear hoist access.

3.28 The illustrative Masterplan for the Proposed Development included in the Transport Assessment, is shown Appendix A of my evidence and an extract of which is shown at Image 3.1, above. A review of the Illustrative Masterplan highlights that there is no provision for accessible car parking bays within the stadium parking area and no bays are shown to have side and rear access zones, as required by WBC accessible parking guidance

3.29 Whilst it appears that the layout could be amended to incorporate disabled accessible parking bays, this could result in a reduction in parking bays from that shown on the Illustrative Masterplan and I consider that confirmation should be provided that an appropriate level of accessible parking provision is delivered in this area.

Medical Centre/Pharmacy Car Parking

3.30 The Proposed Development includes provision of a D1 medical centre, including pharmacy and ancillary space, of circa 1,151 sqm (based on the planning committee report) and it is understood that the medical centre would provide up to 8 consulting rooms.

3.31 As set out in Section 2 of my evidence, maximum parking standards for the medical centre are set out in the WBC 'Parking Standards' SPD and the SCC 'Vehicular and Cycle Parking Guidance' document. Both the WBC and SCC parking standards advise the following maximum parking for medical centre/ doctors practice use:

"1 car space per consulting room remaining spaces on individual assessment"

3.32 The Transport Assessment supporting the planning application detailed that no car parking would be provided for the medical centre use. A subsequent Vectos Technical Note dated 3rd March 2020 states that up to 8 car parking spaces will be provided for the medical centre use and these will be provided within the stadium car park.

3.33 No detail has been provided by the Appellant as to how these 8 spaces for the medical centre use will be allocated or managed within the stadium car park. No detail has been provided by the Appellant as to whether the 8 spaces will be permanently dedicated to the medical centre use or whether the parking spaces will operate on a shared basis between the stadium and medical centre uses.

3.34 The provision of 8 parking spaces permanently dedicated for the medical centre within the 60 space stadium car park would have the effect of reducing the available car parking for the stadium use from 60 spaces to 52 spaces. As set out previously in my evidence no analysis is presented with the Appellant's Transport Assessment to demonstrate that 60 or 52 parking spaces is sufficient to accommodate parking demand associated with players, matchday officials, VIPs and disabled visitors that are identified as utilising this parking area.

3.35 If the proposal is for the spaces to be shared between the medical centre and stadium uses, no detail has been provided on how the shared use of spaces will be managed and no Parking Management Plan has been prepared or submitted as part of the planning application.

3.36 Draft Condition 11, as listed within the planning committee report, relates to the hours of use of floorspace, including the medical centre and pharmacy, and states that:

"Apart from the stadium (Class D2 use) and its ancillary spaces/uses (including the bar and hospitality areas), the other floor space and uses hereby permitted within the stadium must only open to customers/members of the public between the following hours:

- *08:00 - 23:00 hrs Mondays to Saturdays (inclusive); and*
- *09:00 - 23:00 hrs Sundays and Bank/Public Holidays"*

3.37 Based on the wording of draft Condition 11 it is evident that the allowed hours of operation of the medical centre and pharmacy include weekday evenings and weekend afternoons which would be concurrent to typical match times at the stadium. To this extent the shared use of the parking spaces between the medical centre/pharmacy and stadium use has the potential for conflict in use of the bays with requirements for medical centre/ pharmacy and stadium uses to require access to the bays concurrently. No detail has been provided by the Appellant to demonstrate and how the shared use of the spaces will be managed without conflict at times when both the medical centre and a stadium event are operational concurrently.

Summary

3.38 My evidence demonstrates that:

- The proposed parking provision for the stadium use is significantly below the adopted parking standards of WBC and SCC, at just 10% of the maximum provision allowed;
- Where parking requirements are being assessed on an individual assessment basis, the assessment should demonstrate that either the demand for parking is met on site or is appropriately managed and mitigated off site;
- My evidence demonstrates that an appropriate individual assessment of off site car parking demand associated with the proposed stadium has not been undertaken and the Appellant has not demonstrated that demand for off site stadium car parking will managed and mitigated appropriately;
- Detail provided by the Appellant confirms that the majority of matchday staff will not have access to on site car parking but no detail is provided with the submission to confirm the number of matchday staff that will be employed at the stadium on a matchday and will be required to park off site;
- The proposed Masterplan does not detail where the proposed provision of accessible car parking will be provided within the stadium parking area; and,
- No detail has been provided by the Appellant as to how 8 parking spaces proposed for the medical centre use will be allocated or managed within the stadium car park and no Parking Management Plan has been provided. If 8 parking spaces are permanently dedicated to the medical centre use, this will reduce available parking for the stadium. If shared use of spaces between the medical centre and stadium use is proposed, this will result in conflict between the medical centre and a stadium uses, when both are operating concurrently.

4.0 Parking Demand & Individual Assessment

4.1 In this section of my evidence, I consider the parking demand associated with the proposed stadium with reference to the information presented by the Appellant within the Transport Assessment, Stadium Travel Plan and Event Management Plan.

Existing Stadium Parking Demand

4.2 Based on information presented on the Woking Football Club website, a screenshot of which is attached at Appendix B, the club had an average attendance of 2,135 for the 19 home league games played during the 2019-2020 season.

4.3 In order to assess the mode share of spectators on a matchday, the Appellant refers to a travel survey of spectators at the existing stadium undertaken on 6th August 2019. The results of that travel survey are presented at Table 8.19 of the Transport Assessment and replicated at Table 4.1 below.

	Surveyed Mode Share
Train	12.6%
Bus	2.7%
Taxi	1.8%
Motorcycle	0.4%
Car (Driver and Passenger)	62.3%
Bicycle	0.9%
Walk	19.3%
Total	100%

Table 4.1: Football Spectator Mode Share (Extracted from Table 8.19 of Transport Assessment)

4.4 The mode share data presented in the Transport Assessment concludes that 62.3% of spectators travel to matches by car. The Appellant states that the questionnaire survey did not differentiate between car drivers and car passengers but concludes that the average car included two people and therefore half of car arrivals will be a car driver and half will be a car passenger.

4.5 The car driver mode share for spectators equates to the level of parking demand associated with the spectators visiting the stadium. Based on the current average attendance of 2,135 spectators and the surveyed spectator car driver mode share of 31.15%, this would equate to 665 spectators driving to the stadium and seeking to park near the stadium for an average home match.

4.6 The Appellant undertook a parking survey on Tuesday 6th August 2019, which was a weekday evening matchday. That matchday was the opening home game of the season against local rivals Aldershot Town. The attendance at that match was 3,922 spectators. Based on the surveyed spectator mode share, 31.15% car driver, this would have equated to 1,222 spectators driving to the stadium and seeking to park near the stadium on that matchday.

Proposed Stadium Parking Demand

4.7 The Proposed Development will provide a stadium with a capacity of 9,026 spectators. The analysis presented within the Transport Assessment considered a capacity of 9,500 spectators, however, for the purpose of my evidence and analysis I have considered a capacity of 9,026 spectators.

4.8 Table 8.20 of the Appellant's Transport Assessment details the expected multi-modal trip attraction of football spectators to the proposed stadium and is replicated at Table 4.2 below except I have updated the analysis based on 9,026 spectators rather than 9,500 spectators.

	Mode Share	Multi-Modal Trips
Train	12.6%	1,137
Bus	2.7%	244
Taxi	1.8%	162
Motorcycle	0.4%	36
Car Driver	31.15%	2,812
Car Passenger	31.15%	2,812
Bicycle	0.9%	81
Walk	19.3%	1,742
Total	100%	9,026

Table 4.2: Football Spectator Multi-Modal Trips

4.9 Based on the mode share analysis presented by the Appellant in the Transport Assessment and the proposed 9,026 spectators, the proposed stadium could result in 2,812 football spectators travelling to the proposed stadium as a car driver, with a further 2,812 travelling to the stadium as a car passenger.

4.10 Based on the assessment presented by the Appellant, it is evident that the proposed football stadium could result in parking demand for 2,812 cars to park on a matchday associated with football spectators. It is noted that this analysis does not make allowance for parking associated with matchday staff, the majority of whom do not have access to on site stadium car parking.

4.11 As identified in Section 3 of my evidence, and the Appellant's own planning documentation, no on site car parking is provided for spectators or matchday staff, other than a small number of VIPs and disabled spectators. As such the vast majority of parking associated with spectators and matchday staff will occur off site. Based on the multi-modal analysis presented above this could result in 2,812 vehicles parking off site, associated with spectators.

4.12 It is acknowledged that the Proposed Development includes some sustainable transport measures which seek to reduce reliance on the private car and, for the stadium element of the development, these are detailed within the Stadium Travel Plan and Event Management Plan submitted alongside the planning application. The Stadium Travel Plan assesses the benefit of the various sustainable transport measures being promoted by the Appellant and the effect these will have on spectator mode share. Table 4.3 below replicates data presented at Table 4.2 of the Stadium Travel Plan with regard baseline (surveyed) and target spectator mode share.

	Baseline Spectator Mode Share	Target (Year 5) Spectator Mode Share
Train	12.6%	14.6%
Bus	2.7%	4.7%
Taxi	1.8%	1.8%
Motorcycle	0.4%	0.4%
Car Driver	31.15%	26.15%
Car Passenger	31.15%	31.15%
Bicycle	0.9%	1.9%
Walk	19.3%	19.3%
Total	100%	100%

Table 4.3: Stadium Travel Plan – Spectator Mode Share Targets

4.13 The Stadium Travel Plan concludes that, if the sustainable transport measures promoted by the Appellant are successful, this could have the benefit of reducing car driver mode share of spectators by 5% from 31.15% to 26.15%.

4.14 Within the Transport Assessment, Stadium Travel Plan or Event Management Plan, there is no assessment of the expected parking demand associated with the proposed stadium in the scenario where the Travel Plan has achieved its expected targets. In order to assess the expected parking demand associated with the stadium, should the Travel Plan meet its targets, I have applied the mode share targets from Stadium Travel Plan to the proposed number of spectators.

	Mode Share	Multi-Modal Trips
Train	14.6%	1,318
Bus	4.7%	424
Taxi	1.8%	162
Motorcycle	0.4%	36
Car Driver	26.15%	2,360
Car Passenger	31.15%	2,812
Bicycle	1.9%	171
Walk	19.3%	1742
Total	100%	9,026

Table 4.4: Football Spectator Multi-Modal Trips (should Travel Plan meet targets)

4.15 The analysis demonstrates that, should the Travel Plan measures detailed within the Stadium Travel Plan be successful, the proposed stadium could result in 2,360 spectators driving to the stadium.

4.16 It is highlighted that there is no guarantee that the measures detailed within the Travel Plan will result in the reduction in mode share assessed by the Appellant and the Travel Plan may not achieve the reduction in car driver mode share identified. However, for the purpose of my evidence and analysis, I have assumed that the mode share targets identified by the Appellant will be achieved and this is considered a best-case scenario. On this basis, the proposed stadium could result in 2,360 spectators driving by car to the stadium and seeking to park in the vicinity of the site.

Net Change in Car Park Demand

4.17 The stadium currently has an average attendance of 2,135 spectators. Based on the surveyed spectator mode share presented at Table 4.1, this equates to 665 spectators driving to the stadium and seeking to park near the stadium for a current average home match.

4.18 Based on the analysis presented above, the proposed stadium could result in 2,360 football spectators travelling to the stadium as a car driver and seeking to park near the stadium. The Proposed Development could therefore result in an increase of 1,695 cars seeking to park off site in vicinity of the stadium, in comparison with an existing average matchday.

4.19 It is highlighted that this assessment does not consider off site parking demand associated with matchday staff. As previously identified, information provided within the Appellant's Transport Assessment and Event Management Plan confirms that the majority of matchday staff including stewards, hospitality staff, security and ground staff will not have access to the on site parking on matchdays and will be required to park off site.

4.20 No analysis is provided within the Transport Assessment to assess the number of staff on site on a matchday or the expected parking demand associated with matchday staff. On that basis, the analysis of off site and on-street parking demand will underestimate the level of on-street parking that could be associated with stadium on a matchday.

Summary

4.21 My evidence demonstrates that:

- The stadium currently has an average attendance of 2,135 spectators for a home match.
- Based on the surveyed mode share it is estimated that an average home match currently results in 665 spectators driving to the stadium and seeking to parking near the stadium;
- Should the Stadium Travel Plan achieve its targets the proposed stadium could result in 2,360 spectators driving to the stadium and parking off site;
- The proposed stadium could result in an increase of 1,695 cars parking off site in comparison with an average match day at present; and,
- No analysis is provided within the Transport Assessment to assess the number of staff on site on a matchday or parking demand associated with matchday staff. On that basis, the analysis of off site and on-street parking demand will underestimate the level of on-street parking that will be associated with the stadium on a matchday.

5.0 Parking Impact

5.1 In this section of my evidence, I consider the impact of parking associated with the Proposed Development on the highway network local to the site and whether the Appellants have appropriately assessed, managed and mitigated off site parking impacts associated with the Proposed Development.

Appellants Assessment of Parking Impact

5.2 In order to assess the baseline parking conditions on the streets in the vicinity of the Proposed Development, the Appellant undertook a parking beat survey. Paragraph 5.21 of the Transport Assessments confirms that the parking beat survey was undertaken on Tuesday 6th August 2019 and Wednesday 7th August 2019.

5.3 It is noteworthy that during the 2019-2020 football season Woking Football Club were scheduled to play 23 home league matches during the season, excluding friendly matches or cup competitions. The final 4 home matches of the season were cancelled as a result of the coronavirus pandemic and national lockdown travel restrictions. However, of the 23 scheduled home league matches during the 2019-2020 season, 16 were scheduled to occur on a Saturday at 3pm and 7 were scheduled to occur on weekday evenings. For the 2020-2021 season Woking Football Club are scheduled to play 22 homes matches (as the League has reduced in size from 24 to 23 teams) with 14 scheduled to occur on a Saturday at 3pm and 8 scheduled to occur on weekday evenings.

5.4 It is evident that the majority of Woking Football Club home football matches occur on a Saturday afternoon at 3pm. The parking survey presented by the Appellant was undertaken solely on a weekday evening period. No survey of baseline parking conditions on a Saturday afternoon has been undertaken as part of the Transport Assessment or planning application.

5.5 Given that the majority of home football matches occur on a Saturday afternoon it is evident that the Appellant should have assessed the baseline parking conditions on the Saturday afternoon period, in addition to the weekday evening period, as parking conditions are likely to be different. To this extent it is evident that Appellant's assessment has not provided a complete assessment of baseline parking conditions on typical matchdays in the vicinity of the site.

5.6 It is industry standard practice to undertake any survey during a neutral time of year e.g., away from holiday periods and during standard school term times. To this extent Planning Practice Guidance 'Transport Evidence basis in plan making and decision taking' (March 2015) states:

"Transport data should be included that reflects the typical (neutral) flow conditions on the network (for example, non-school holiday periods, typical weather conditions etc) in the area of the Plan, and should be valid for the intended purposes"

and

"The recommended periods for data collection are spring and autumn, which include the neutral months of April, May, June, September and October."

5.7 The parking survey undertaken by the Appellant and presented within the Transport Assessment was undertaken in August 2019 during the school summer holiday period. To this extent it is evident that Appellant's assessments of baseline parking conditions is not based on a neutral month and does not provided an appropriate assessment of baseline parking conditions in accordance with Planning Practice Guidance.

5.8 Table 5.4 of the Transport Assessment presents a summary of the results of the parking survey on a selection of 10 streets for a weekday matchday and non-match day. I highlight that this is not the full scope of the parking survey and is just a selection of streets within the study area for which the Appellant considers there is the greatest change in parking on current match days.

5.9 Table 5.4 of the Transport Assessment is also replicated at Paragraph 4.19 of the Event Management Plan which states that:

"The parking survey demonstrated the greatest change in on-street parking demand on current match days on streets with no existing parking restrictions were on the streets contained within Table 4.2 The location of these streets is shown in Figure 4.2."

5.10 Table 4.2 of the Event Management Plan is replicated at Image 5.1 below.

Table 4.2 – Car Parking Beat Survey Greatest Change Streets

Road Name	Number of Spaces	Match Day Occupancy 19:00-22:00	Non-Match Day Occupancy 19:00-22:00
Elmbridge Lane	12	100%	23%
Queen Elizabeth Way	95	78%	43%
Howards Road	41	81%	28%
Howards Close	9	133%	84%
Loop Road	45	76%	43%
Whitegates	11	89%	45%
Westfield Avenue	49	78%	1%
Maple Grove	15	77%	7%
Chesnut Grove	25	100%	61%
Acer Grove	10	75%	5%

Image 5.1: Table 4.2 (Extracted from Event Management Plan, Appendix N of Transport Assessment)

5.11 Table 4.2 of the Event Management Plan presents the parking occupancy or parking stress on a selection of streets around the site on an existing matchday and non-matchday. Parking occupancy figures are shown as a percentage of total parking opportunities on a given street, with higher percentages of parking occupancy equating to higher ratios of parking stress.

5.12 The result of the survey presented at Table 4.2 of the Event Management Plan show that a number of streets surrounding the site experience an increase in parking occupancy on an existing matchday and experience stressed parking conditions on matchdays.

5.13 Figure 4.2 of the Event Management Plan is replicated at Image 5.2 below and identifies the streets shown in Table 4.2 of the Event Management Plan for which the Appellant considers experience the greatest increase in on-street parking on an existing matchday.

Figure 4.2 – Streets with Greatest Increase in Match Day On-Street Parking Demand

Image 5.2: Figure 4.2 (Extracted from Event Management Plan, Appendix N of Transport Assessment)

5.14 The analysis of on-street parking presented in the Appellant's Transport Assessment and Event Management Plan, as presented above, is based solely on a survey of an existing non-matchday and matchday at the existing stadium.

5.15 The Appellant has undertaken no assessment of the additional on-street parking demand as a result of the Proposed Development or the impact of this additional parking demand on on-street parking conditions.

5.16 As set out in Section 4 of my evidence, based on information in the Appellant's Transport Assessment at Table 8.20, the proposed stadium could result in 2,360 spectators driving to the site. No assessment is undertaken in the Transport Assessment or Event Management Plan of where 2,360 vehicles will park and the impact of this parking on local parking conditions, highway safety or residential amenity.

5.17 On that basis it is evident that the Appellant has not undertaken an appropriate "*individual assessment*" or demonstrated that the parking impact of the site can be "*mitigated or managed*" in accordance with the WBC and SCC parking standards.

Assessment of On Street Parking Demand

5.18 As the Appellant has not undertaken an assessment of the impact of parking associated with the development, I have therefore undertaken my own assessment of matchday parking associated with the proposed stadium.

5.19 Given the current pandemic travel restrictions and restrictions on spectator attendance at football matches, it has not been possible to undertaken any revised or additional parking surveys to address the deficiencies with the Appellant's parking survey i.e. the parking survey being undertaken in August in a non-neutral month and no Saturday survey being provided.

5.20 On that basis it has been necessary for my assessment of parking impact to be based on the results of the parking survey presented by the Appellant at Appendix H of the Transport Assessment. My analysis is also based on the parking demand analysis presented at Section 4 of my evidence, derived from the Appellant's own assessment of parking demand.

5.21 The full extent of the parking survey undertaken by the Appellant is presented at Figure 5.1 of my evidence attached and demonstrates that the parking survey covered streets within a circa 750 metre radius of the site.

5.22 Based on Table 4.2 of the Appellant's Event Management Plan, replicated at Image 5.1 of my evidence, I highlighted the streets that currently experience 100% (or greater) parking occupancy on the existing surveyed matchday and this is presented at Figure 5.2 of my evidence. I note that, based on existing matchday occupancy, three streets in the vicinity of the site experienced 100% (or greater) parking occupancy on the surveyed existing matchday.

5.23 Image 5.3 below is extracted from Appendix H of the Transport Assessment and presents a summary of the full results of the parking survey undertaken by the Appellant.

Street: **Study Area Results**

	Vehicles Parked (vol)												
Day	Tue	Tue	Tue	Tue	Tue	Tue	Wed	Wed	Wed	Wed	Wed	Wed	Aug-2019
Restriction	18:00	19:00	20:00	21:00	22:00	23:00	18:00	19:00	20:00	21:00	22:00	23:00	Capacity
White Lines	2	2	2	2	1	1	0	0	0	0	0	0	14
Unrestricted	540	603	593	520	382	391	367	357	352	358	392	406	1244
Bus Stop	0	0	0	0	0	0	0	0	0	0	0	0	41
Drop Kerb	10	9	11	11	4	4	3	6	3	4	5	4	407
Single Yellow	75	90	100	95	48	27	7	8	9	14	13	13	151
Voucher Parking	80	85	86	84	82	72	58	63	63	65	66	66	96
Narrow	120	118	114	118	104	93	73	88	87	98	110	114	1027
Double Yellow	7	13	13	15	3	3	2	1	1	1	0	1	671
Zig Zag Lines	0	0	0	0	0	0	0	0	0	0	0	0	31
Pedestrian Crossing	-	-	-	-	-	-	-	-	-	-	-	-	0
Pay and Display	418	450	450	451	106	29	404	365	204	113	36	22	478
Disabled Bays	10	19	15	15	10	9	24	25	20	11	9	9	35
Authorised	5	6	4	8	2	1	21	18	19	10	2	2	30
Parking Bays	119	124	124	125	123	117	114	117	114	109	110	113	161
Coaching Parking	0	0	0	0	0	0	0	0	0	0	0	0	4
Long Stay	83	90	88	88	11	4	71	65	21	11	0	0	90
Motor Cycles Only Bay	0	0	1	0	0	0	11	11	9	3	0	0	28
Resident Permit Holders Only	1	3	3	3	2	4	5	2	3	4	3	5	7
All	1470	1612	1604	1535	878	755	1160	1126	905	801	746	755	4508

Image 5.3: On Street Parking Survey (Extracted from Appendix H of Transport Assessment)

5.24 Potential parking opportunities within the study area would include 'unrestricted' kerbside space, single yellow lines (outside the hours of control), pay and displays bays, parking bays and long stay parking bays.

5.25 Table 5.1 below summaries the parking capacity and available parking bays on the surveyed matchday. On the surveyed matchday (Tuesday 6th August 2019), the match kicked off at 7:45pm and so the survey count at 8:00pm has been utilised to provide an assessment of existing on-street parking on a matchday.

	Vehicles Parked	Capacity	Available Spaces
Unrestricted	593	1,244	651
Single Yellow	100	151	51
Pay and Display	450	478	28
Parking Bays	124	161	37
Long Stay Parking Bays	88	90	2
Total	1,355	2,124	769

Table 5.1: Existing Matchday On-Street Parking Occupancy

5.26 The results of the parking survey presented within the Transport Assessment indicate that there are a total of 2,124 parking opportunities within the survey study area of an approximate 750 metre radius of the site. On the day of the survey and existing matchday there were a total of with 1,357 vehicles parked on streets at 8pm and a total of 769 parking opportunities available.

5.27 The parking survey highlights that the majority of streets in the vicinity of the site are uncontrolled, with no parking restrictions or parking charges. The unrestricted streets have no parking controls or changes. The streets with single yellow lines in the vicinity of the site are generally not controlled during typical matchday times and so would be uncontrolled on matchdays. The streets identified as 'parking bays' are uncontrolled marked bays with no charges or restrictions. The only controlled/charged parking bays within the study area are the pay and display parking bays and long stay pay and display parking bays all of which were contained within the Woking Park car park that was within the study area.

5.28 On the surveyed matchday the attendance at the ground was 3,922 spectators. Based on the surveyed mode share of spectators of 31.15% car driver, there would have been 1,222 spectators parked off site near the stadium on that matchday.

5.29 As demonstrated at Section 4 of my evidence, the proposed stadium could attract 2,360 spectators driving by car and parking off site on a matchday. This equates to an increase of up to 1,138 cars seeking to park off site on a matchday when compared to the surveyed matchday.

5.30 The parking survey undertaken by the Appellant, and summarised at Table 5.1 above, concludes that on the surveyed matchday there were 769 available free and controlled parking opportunities on the streets within the circa 750 metres radius of the site. Of the 769 available parking opportunities on the survey matchday 741 were on-street parking opportunities with no parking changes and 28 of the parking opportunities were pay and display parking bays within the Woking Park car park.

5.31 The parking demand analysis demonstrates that the proposed stadium could result in an increase in off site parking demand of 1,138 cars compared to the surveyed matchday. It is common sense that these spectators will seek to park in the closest and most convenient parking opportunities to the stadium, in particular if those are opportunities for free car parking. On that basis it is evident that these spectators will likely seek to parking on the free, uncontrolled parking opportunities on streets around the site.

5.32 This additional demand for 1,138 cars to park near the stadium would occupy up all 769 available on-street parking opportunities identified within the scope of the parking survey. This is shown on Figure 5.3, attached, which identifies that the additional parking demand as a result of the proposed stadium could occupy all available parking opportunities within the surveyed study area and result in all streets within the study area experiencing 100% parking occupancy on a matchday with the Proposed Development in place.

5.33 In addition, there would be a further 369 vehicles for which there isn't capacity to accommodate parking within the scope of the study are and would need to park elsewhere, likely on uncontrolled streets outside the area covered by parking survey. It has not been possible to undertake an additional parking survey to assess the impact of the 369 vehicles seeking to parking on-street outside the extent of the Appellant's parking survey. However, it is evident that this will increase the extent of streets around the site that will be impacted by parking associated with the Proposed Development. Figure 5.3 demonstrates how the additional parking outside the scope of the parking survey will result in parking stress on additional streets outside the scope of the parking survey.

5.34 It is acknowledged that some streets on the edge and just outside the scope of the parking survey are currently within a controlled parking zone (CPZ). These streets are within WBC CPZ Zone 5 and a plan, extracted from the WBC website, showing the area of this parking zone is attached at Appendix C. The information provided at Appendix C demonstrates that CPZ Zone 5 is only in operation from 9:30am to 11:30am Monday to Friday. On that basis it is evident that these streets will be uncontrolled at the typical times of football matches (weekday evenings and weekend afternoons) and will be available for free, unrestricted parking for football spectators.

5.35 It is evident from my analysis that the Proposed Development could result in all uncontrolled streets within the circa 750 metre radius of the parking survey experiencing 100% parking occupancy on a matchday, along with further streets outside the scope of parking survey also experiencing overspill parking from the stadium resulting in stressed parking conditions.

Parking Controls

5.36 The Transport Assessment and subsequent Technical Note state that the Appellant is not proposing to introduce any Traffic Regulation Orders (TROs) which would provide parking control to mitigate for the impact of on-street parking associated with the Proposed Development with Paragraph 10 of the Technical Note dated 3rd March 2020 stating:

"The proposed development is not proposing the introduction of Traffic Restriction Orders (TRO)s."

5.37 The Appellant has indicated that it may provide a contribution to a consultation exercise of possible implementation of TROs and Figure 1 of Technical Note summarises 10 streets where the Appellant considers parking restrictions may be appropriate and this Figure is presented below.

Figure 1 – Appropriate Parking Restrictions Locations

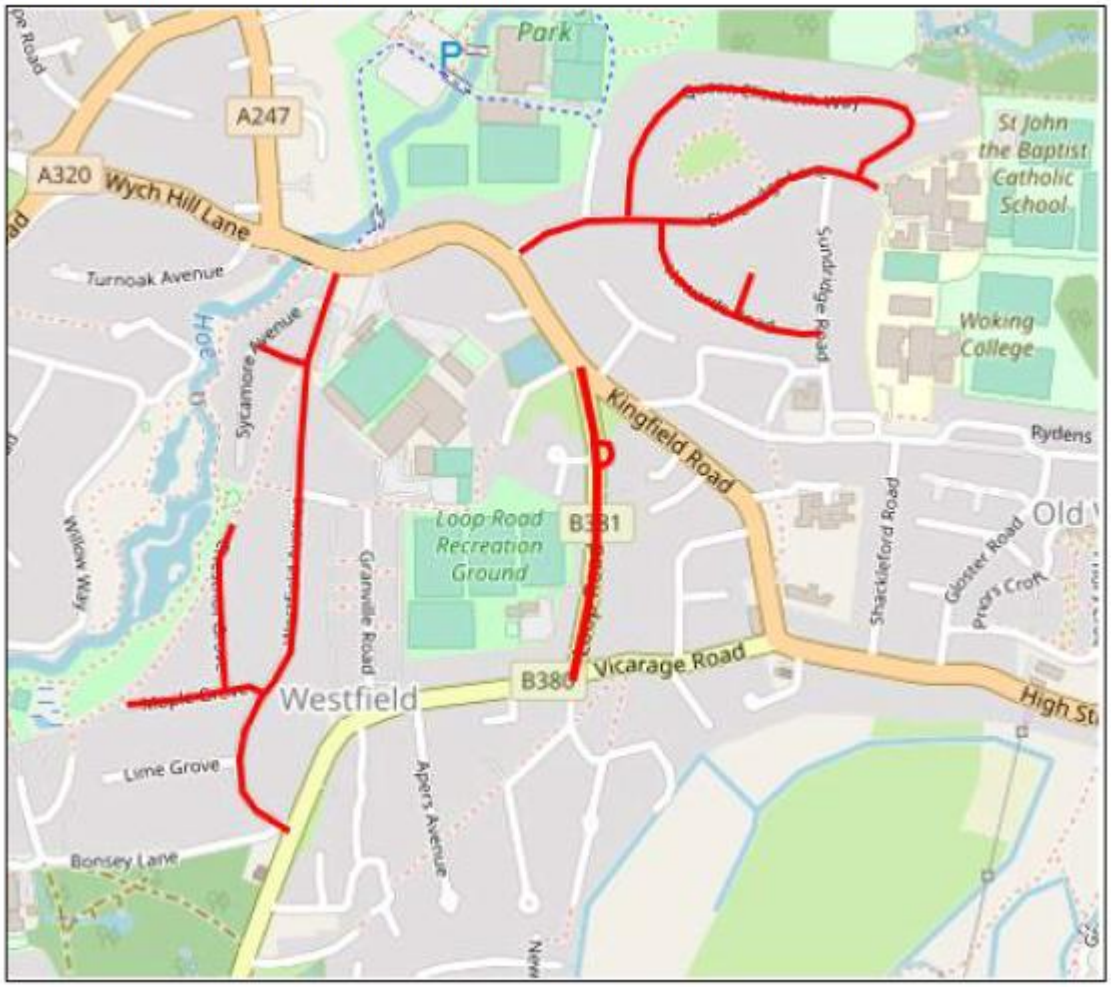


Image 6.3: Figure 1 (Extracted from Technical Note dated 3rd March 2020)

5.38 It is highlighted that Figure 1 from Technical Note dated 3rd March 2020 replicates of Figure 4.2 of the Event Management Plan. As previously identified this Figure shows streets which the Appellant considers have the greatest increase in matchday parking during the existing surveyed matchdays at the ground. As previously demonstrated, this Figure makes no analysis of the impact of increased on-street parking demand associated with the proposed stadium.

5.39 The current draft Heads of Terms for the Executive Undertaking include provision for:

"The funding of consultation and implementation of Traffic Regulation Orders (TRO's) to manage parking on local streets"

5.40 No detail is provided on the extent of funding the Appellant has offered to provide, the extent of consultation and potential for TRO's and the timeframe over which consultation will be undertaken.

5.41 The results of my own parking demand analysis demonstrate that the proposed stadium will have a significant parking impact over a wide area, even exceeding the 750 metre radius of the site covered by the matchday parking survey.

5.42 I consider that the detail provided by the Appellant in relation to the introduction of parking controls is insufficient and does not provide any confirmation that appropriate parking controls will be implemented to manage parking associated with the proposed stadium. On that basis, the Appellant is proposing that the majority of streets around the site will remain uncontrolled on matchdays and the proposed stadium could result in a significant increase in on-street parking in the vicinity of the site, which would result in a significantly detrimental effect on local parking conditions.

Assessment of On-Street Parking Impact

5.43 My evidence demonstrates that the Proposed Development could result in all uncontrolled residential streets within the 750 metres radius of the site covered by the matchday parking survey operating at 100% full parking occupancy on a matchday with additional on-street parking occurred outside the extent of the parking survey.

5.44 This increase in on-street parking around the Proposed Development will have an urbanising effect on the nature of local streets and will result in stressed parking conditions during matchdays. It is evident that this level of parking stress will result in a detrimental impact on local parking conditions and result in material harm, in particular to highway safety and residential amenity.

5.45 The WBC Parking Standards SPD states that parking:

"*has the potential of influencing the way people travel, the efficient use of land, highway safety, as well as the quality of the built environment.*"

5.46 The 'Lambeth' methodology is an industry standard approach to undertaking parking surveys and is an appropriate guidance document for undertaking parking surveys and considering the impacts of on-street parking. In relation to the harm caused by high levels of parking stress, the Lambeth methodology states that:

"High parking stress can affect highway safety, the free-flow of traffic, amenity, access by emergency services, refuse collection and delivery of goods"

5.47 Based on the WBC Parking Standards SPD and the Lambeth methodology it is evident that on-street parking can influence highway safety, with high on-street parking stress resulting in a detrimental impact on highway safety.

5.48 It is common sense that where levels of on-street parking occupancy and parking stress are low, drivers will have a choice of on-street parking locations and will likely choose to park in appropriate and safe on-street locations. However, where on-street parking occupancy is high and there are limited or no on-street parking opportunities, it is common sense that drivers may choose to park in inappropriate or unsafe locations and this could include in close proximity to junctions, locations which impede visibility or on verges and pavements.

5.49 The analysis presented in my Evidence demonstrates that the Proposed Development could result in very high levels of on-street parking occupancy and parking stress on the streets around the site. This could result in drivers parking in inappropriate locations to the detriment of highway safety and resulting in an unacceptable impact on highway safety, contrary to the NPPF.

5.50 Furthermore, the high levels of parking occupancy resulting from the Proposed Development will restrict the ability of local residents to park close to their homes and restrict the ability of visitors to those properties parking nearby. The ability of residents living close to the stadium to park close to their property, or to have their friends, family and visitors park near their property, is clearly a matter of residential amenity. The high levels of parking occupancy and stress likely to occur as a result of the Proposed Development will restrict the ability for residents, and their visitors, to park close to their homes, resulting in detrimental harm to residential amenity.

5.51 Paragraph 102 of the NPPF states that transport issues should be considered from the earliest stages of preparing development proposals and that:

"patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places."

5.52 To this extent the NPPF clearly identifies that the consideration of appropriate parking is integral to the design of the any scheme if high quality places are to be delivered. My evidence demonstrates that the Proposed Development will result in significant levels of off site parking occurring on the streets in the vicinity of the site and that this parking will have a detrimental impact on parking availability, highway safety and residential amenity. It is therefore evident that the Proposed Development will not contribute to making high quality public spaces, contrary to the NPPF.

Park and Stride

5.53 The Appellant is proposing to promote a 'Park and Stride' arrangement whereby spectators are encouraged to park in off site car parks and walk to the stadium. The Stadium Travel Plan and Event Management Plan identify three car parks that Appellant identifies could be promoted as park and stride car parks.

5.54 The three car parks proposed by the Appellant as park and stride car parks are shown on Figure 5.4, attached and are as follows:

- Manor Way Car Park - 74 spaces. 1.7 kilometre and 21 minute walk from the site;
- Heathside Car Park - 465 spaces. 1.5 kilometre and 19 minute walk from the site; and,
- Shoppers Blue Car Park - 918 spaces. 1.8 kilometre and 23 minute walk from the site.

5.55 The walking times listed above are based on a walking speed on 5 kilometres per hour and Figure 5.5, attached, identifies the most direct walking route between stadium and the car park and the walking time and distance of that journey. I note that the walk times indicated between the car park and the stadium are one way walk times and a spectator will need to walk that journey time on both arrival and departure from the stadium. The Manor Way car park does not have any parking charges but both Heathside car park and Shoppers Blue car park charge for parking with current changes of £4.50 for 2 to 3 hours parking and £6 for 3 to 4 hours parking.

5.56 It is highlighted that all three car parks the Appellant has identified as potential park and stride car parks are outside the farthest extent of the parking survey undertaken by the Appellant and this is highlighted at Figure 5.4, attached. The Appellants parking survey covered streets within a circa 750 metre radius of the site, whilst the closets park and stride car park is a 1.5km walk from the site; twice the distance of the extent of the parking survey. To this extent all of the free, uncontrolled parking opportunities on the streets surrounding the site, including those identified by the parking survey, are closer to the site than the identified park and stride car parks. I consider it highly unlikely that spectators will utilise charged public car parks further away from the Proposed Development, when there are free on-street parking opportunities closer to the site.

5.57 Woking Football Club currently promotes a park and stride approach for existing matchdays at the stadium. The Woking Football Club website actively directs home and away spectators who are arriving by car to park in the Heathside car park, an extract from the current Woking Football Club website promoting park and stride from Heathside car park is attached at Appendix D.

5.58 WBC has provided occupancy data to myself for the Heathside car park. It is noted that the car park occupancy data provides total occupancy within the car park and does not differentiate between the purpose for which a vehicle was parked within the car park i.e., the data does not differentiate between commuters, shoppers, football spectators or other users. However, in order to assess the likely number of football spectators that currently utilise the car park as a park and stride car park, a comparison of the parking occupancy on a match and non-match day has been undertaken.

5.59 The on-street parking surveys undertaken by Appellant were undertaken Tuesday 6th August 2019 (matchday) and Wednesday 7th August 2019 (non-match day), and occupancy data for the Heathside car for the same match and non-matchday has been obtained. In addition to assessing weekday use of the car park, WBC has provided occupancy data for the Heathside car park for Saturday 15th and Saturday 22nd February 2020. On Saturday 15th February there was no home football match at the stadium and on Saturday 22nd February there was a home football match against Stockport County with an attendance of 2,189. Table 5.2 below presents the car park occupancy data for Heathside car park and the data provided by WBC is attached at Appendix E.

	6pm	7pm	8pm	9pm
Tuesday 6th August (Matchday)	64	90	55	80
Wednesday 7th August	176	43	81	70
	2pm	3pm	4pm	5pm
Saturday 15th February	89	93	92	87
Saturday 22nd February (Matchday)	99	101	95	65

Table 5.2: Heathside Car Park – Matchday/ Non Matchday Occupancy

5.60 The football match on Tuesday 6th August kicked off at 7:45pm. Therefore, the comparison of parking occupancy at 8pm will provide a reasonable comparison of whether football spectators typical utilise the Heathside car park as a park and stride car park, as currently promoted by the football club. The information on Heathside car park occupancy shows that at 8pm on the weekday matchday there were 26 fewer cars in the car park than on the following weekday non-matchday.

5.61 The football match on Saturday 22nd February kicked off at 3pm. Therefore, the comparison of parking occupancy at 3pm to 4pm will provide a reasonable comparison of whether football spectators typical utilise the Heathside car park as a park and stride car park, as currently promoted by the football club. The information on Heathside car park occupancy shows that on the Saturday matchday there were 7 more cars at 3pm and 3 more cars at 4pm in comparison with the Saturday non-matchday.

5.62 The information on existing occupancy at the Heathside car park appears to show that a very limited number of spectators currently utilise the car park which the football club promote for park and stride parking and on the matchday surveyed by the Appellant there were fewer cars parking in the car park than on the non-matchday.

5.63 This demonstrates that a material number of football spectators do not currently utilise the car park for park and stride, even though this is currently promoted by the football club. This validates my previous conclusion that it is highly unlikely that future spectators will utilise charged public car parks which are further away from the stadium than free on-street parking opportunities.

5.64 To this extent it is evident that the park and stride arrangements promoted by the Appellant are unlikely to be successful and spectators will continue to park on-street, rather than in public car parks. To this extent the Proposed Development will result in a significant increase in on-street parking in the vicinity of the site, as set out earlier in my evidence, and this will result in a detrimental effect on local parking condition, highway safety and residential amenity.

Summary

5.65 My evidence demonstrates that:

- The majority of home football matches are played on a Saturday afternoon but the Appellant has made no assessment of baseline parking conditions on a Saturday;
- The weekday parking survey presented in the Transport Assessment was undertaken in August, during school holiday period, and therefore does not provide a neutral baseline of existing parking conditions;
- The Appellant has undertaken no assessment of the impact of additional on-street parking demand associated with the proposed stadium;

- The proposed stadium could result in parking demand for 2,360 to park in the vicinity of the site, this is an increase of 1,695 cars seeking to park off site in comparison with a current typical matchday;
- The majority of local streets around the site will remain uncontrolled on matchdays;
- The increase in on-street parking demand as a result of the Proposed Development could result in all streets within the scope of parking survey experiencing 100% parking occupancy on matchdays with further on-street parking outside the scope of parking survey;
- High levels of parking stress are detrimental to local parking conditions and result in harm to highway safety and residential amenity;
- The Proposed Development will result in high levels of parking stress on streets surrounding the site which could result in drivers parking in inappropriate locations, resulting in an unacceptable impact on highway safety, contrary to the NPPF;
- High levels of on-street parking stress resulting from the Proposed Development will restrict the ability of local residents, and their visitors, to park close to their properties, resulting in detrimental harm to residential amenity;
- The impact of on-street parking associated with the Proposed Development will not contribute to making high quality public spaces, contrary to the NPPF; and,
- The park and stride car parks identified by the Appellant are further away than uncontrolled free on-street parking opportunities and the park and stride strategy is unlikely to be utilised by a material number of spectators.

5.66 In conclusion the Proposed Development could result in a significant increase in on-street parking in the vicinity of the site which is not being managed or mitigated by the Appellant and this will result in a detrimental harm to local parking conditions, highway safety and residential amenity. I am of the professional opinion that the Proposed Development does not accord with the Woking Core Strategy, SPD Parking Standards (2018) and the National Planning Policy Framework and the Borough Council were therefore correct to refuse planning permission for the reason set out in reason for refusal 4.

6.0 Summary and Conclusion

Qualifications and Experience

6.1 My name is David Gwyn Lewis and I am a Regional Director at Motion Consultants Limited. I hold a Master Degree in Transport Planning and Engineering and am a member of the Chartered Institution of Highways and Transportation and the Transport Planning Society. I have over 14 years' experience in the field of transportation planning and traffic engineering.

Scope of Evidence

6.2 My evidence focuses on Reason for Refusal 4, relating to parking associated with the stadium and medical centre elements of the Proposed Development. I have considered these in the context of the Woking Core Strategy, SPD Parking Standards and the NPPF.

Reason for Refusal 4

6.3 Reason for Refusal 4 confirms that the Proposed Development provides insufficient on site parking for the proposed stadium and medical centre uses and has failed to demonstrate that this will not result in a material impact on parking conditions on local streets.

6.4 In response to this my Evidence demonstrates the following:

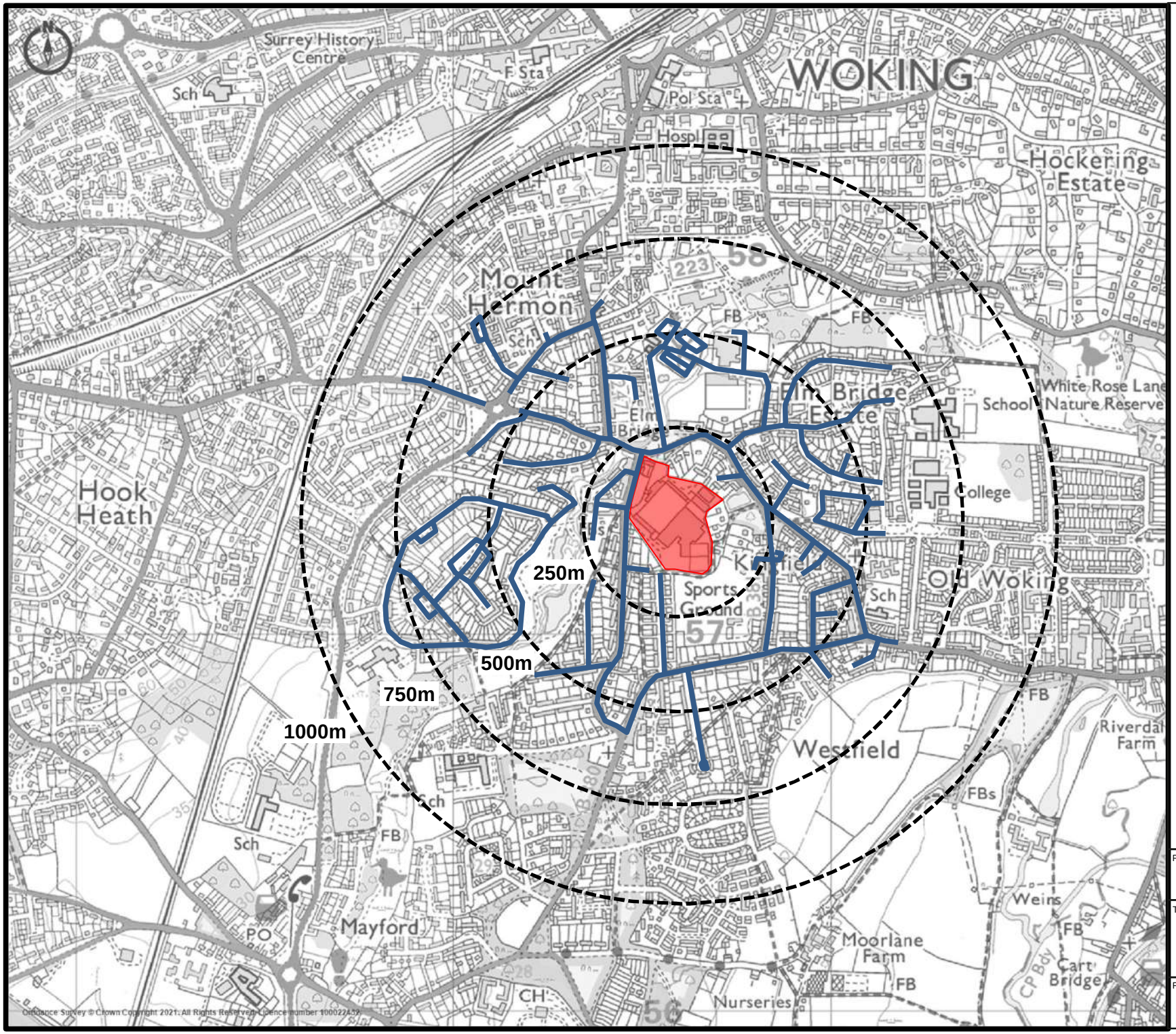
- The proposed parking provision for the stadium use is significantly below the adopted parking standards of WBC and SCC, at just 10% of the maximum provision allowed;
- Where parking requirements are being assessed on an individual assessment basis, the assessment should demonstrate that either the demand for parking is met on site or is appropriately managed and mitigated off site;
- My evidence demonstrates that an appropriate individual assessment of off site car parking demand associated with the proposed stadium has not been undertaken and the Appellant has not demonstrated that demand for off site stadium car parking will managed and mitigated appropriately;
- Detail provided by the Appellant confirms that the majority of matchday staff will not have access to on site car parking but no detail is provided with the submission to confirm the number of matchday staff that will be employed at the stadium on a matchday and will be required to park off site;
- The proposed Masterplan does not detail where the proposed provision of accessible car parking will be provided within the stadium parking area;
- No detail has been provided by the Appellant as to how 8 parking spaces proposed for the medical centre use will be allocated or managed within the stadium car park and no Parking Management Plan has been provided. If 8 parking spaces are permanently dedicated to the medical centre use, this will reduce available parking for the stadium. If shared use of spaces between the medical centre and stadium use is proposed, this will result in conflict between the medical centre and a stadium uses, when both are operating concurrently;
- The stadium currently has an average attendance of 2,135 spectators for a home match and based on the surveyed mode share it is estimated that an average home match currently results in 665 spectators driving to the stadium and seeking to parking near the stadium;
- Should the Stadium Travel Plan achieve its targets the proposed stadium could result in 2,360 spectators driving to the stadium and parking off site;
- No analysis is provided within the Transport Assessment to on-street parking demand associated with matchday staff;
- The majority of home football matches are played on a Saturday afternoon but the Appellant has made no assessment of baseline parking conditions on a Saturday;

- The weekday parking survey presented in the Transport Assessment was undertaken in August, during school holiday period, and therefore does not provide a neutral baseline of existing parking conditions;
- The Appellant has undertaken no assessment of the impact of additional on-street parking demand associated with the proposed stadium;
- The proposed stadium could result in parking demand for 2,360 cars associated with spectators to park in the vicinity of the site, this is an increase of 1,695 cars seeking to park off site in comparison with a current typical matchday;
- The majority of local streets around the site will remain uncontrolled on matchdays;
- The increase in on-street parking demand as a result of the Proposed Development could result in all streets within the scope of parking survey experiencing 100% parking occupancy on matchdays with further on-street parking outside the scope of parking survey;
- High levels of parking stress are detrimental to local parking conditions and result in harm to highway safety and residential amenity;
- The Proposed Development will result in high levels of parking stress on streets surrounding the site which could result in drivers parking in inappropriate locations, resulting in an unacceptable impact on highway safety, contrary to the NPPF;
- High levels of on-street parking stress resulting from the Proposed Development will restrict the ability of local residents, and their visitors, to park close to their properties, resulting in detrimental harm to residential amenity;
- The impact of on-street parking associated with the Proposed Development will not contribute to making high quality public spaces, contrary to the NPPF; and,
- The park and stride car parks identified by the Appellant are further away than uncontrolled free on-street parking opportunities and the park and stride strategy is unlikely to be utilised by a material number of spectators.

Conclusion

6.5 On the basis of my evidence, I am of the professional opinion that the Proposed Development provides insufficient on site parking for the proposed stadium and medical centre uses and has failed to demonstrate that this will not result in a material impact on parking conditions on local streets. The Proposed Development is likely to result in a significant increase in on-street parking in the vicinity of the site which is not being managed or mitigated by the Appellant and this would result in a detrimental harm to local parking conditions, highway safety and residential amenity. I am of the professional opinion that the Proposed Development does not accord with the Woking Core Strategy, SPD Parking Standards (2018) and the National Planning Policy Framework and the Borough Council were therefore correct to refuse planning permission for the reason set out in reason for refusal 4.

Figures



Legend:

Site Location

Parking Beat Survey Scope

north

motion

9 Greyfriars Road Reading, RG1 1NU
T: 0118 206 2930

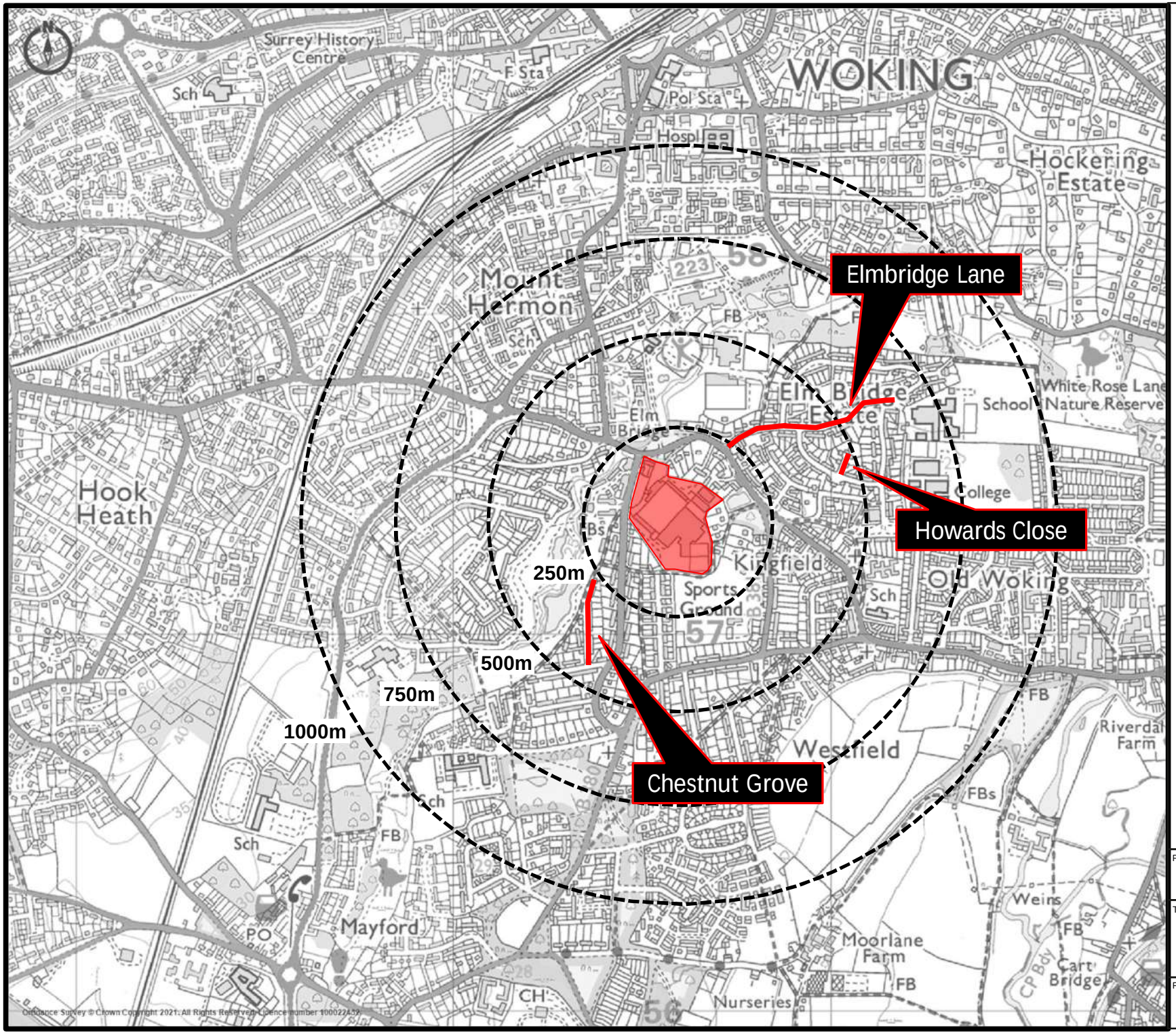
www.motion.co.uk

Project:
Land South of Kingfield Road and East of Westfield Avenue

Title:
Scope of Parking Survey

Figure:
Figure 5.1

Revision:
-



Legend:

- Site Location
- Streets at 100% occupancy on existing matchday

north

motion

9 Greyfriars Road Reading, RG1 1NU
T: 0118 206 2930

www.motion.co.uk

Project:
Land South of Kingfield Road and East of Westfield Avenue

Title:
Existing Matchday Parking Impact

Figure:	Revision:
Figure 5.2	-

Legend:

- Site Location
- Streets at 100% occupancy on existing matchday
- Streets within scope of survey at 100% occupancy
- Potential areas outside scope of parking survey at 100% occupancy

north

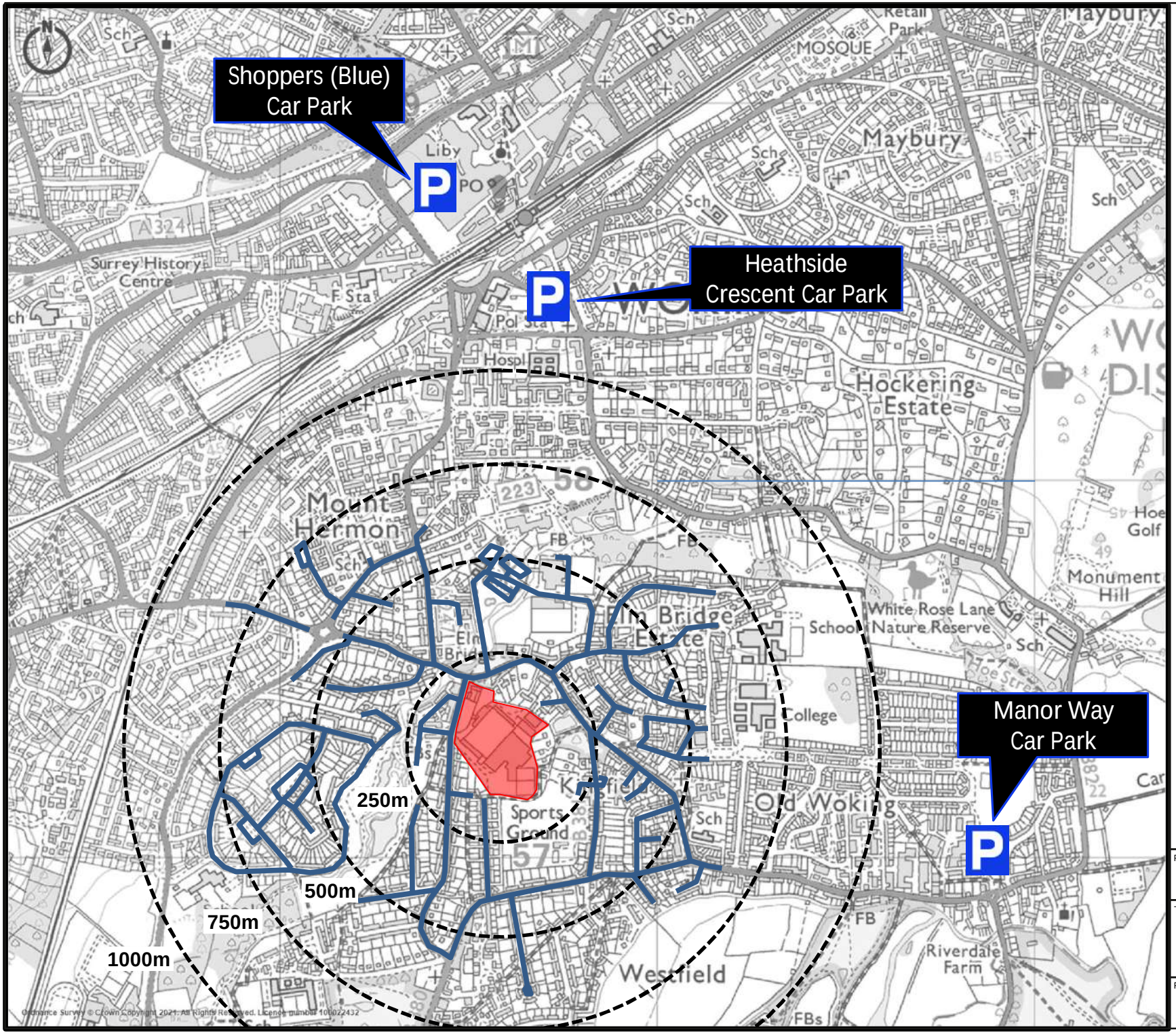
motion
9 Greyfriars Road Reading, RG1 1NU
T: 0118 206 2930
www.motion.co.uk

Project:
Land South of Kingfield Road and East of Westfield Avenue

Title:
Matchday Parking Impact

Figure:
Figure 5.3

Revision:
-



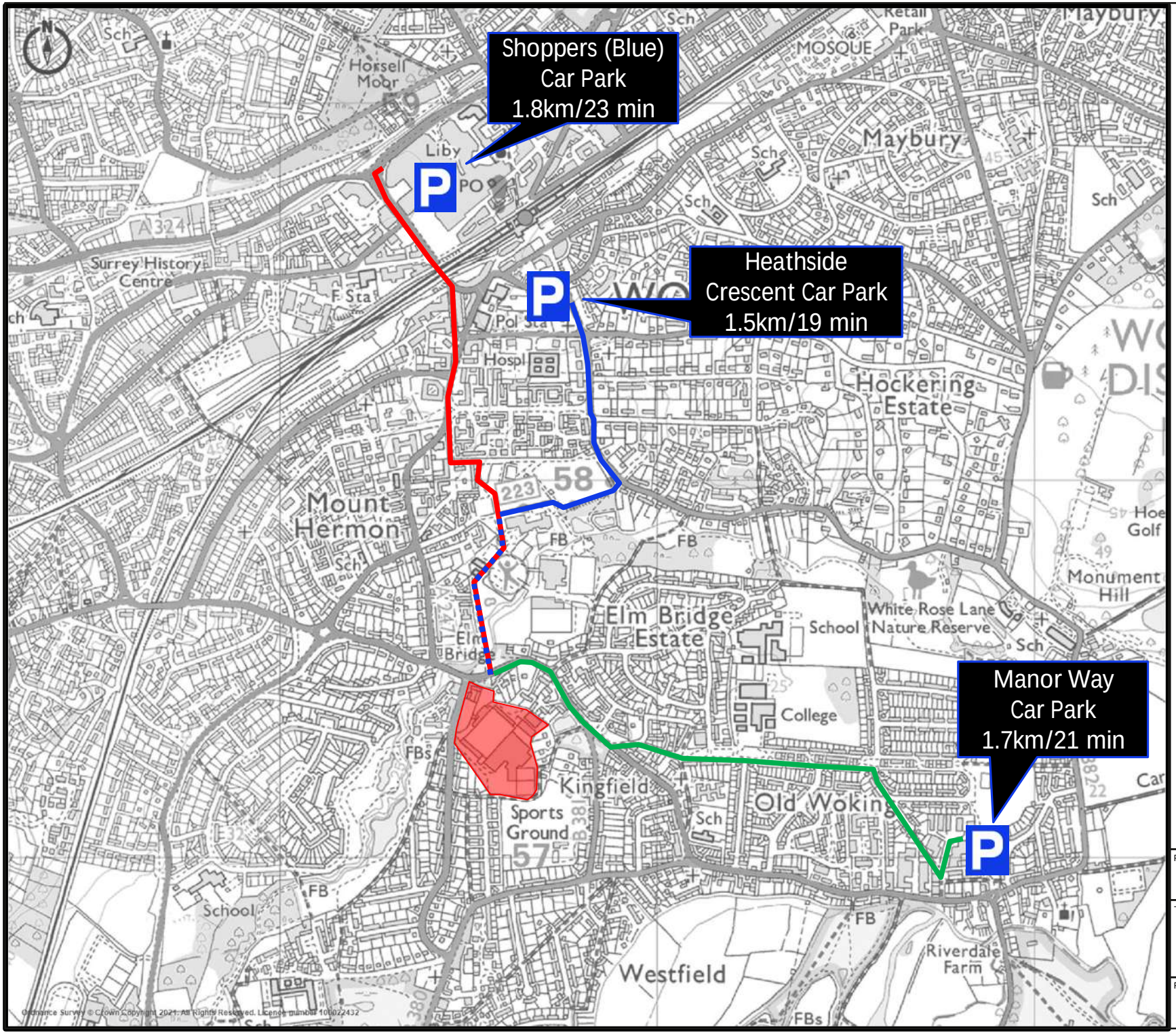
motion
9 Greyfriars Road Reading, RG1 1NU
T: 0118 206 2930
www.motion.co.uk

Project:
Land South of Kingfield Road and East of Westfield Avenue

Title:
Location of Park & Stride Car Parks

Figure:
Figure 5.4

Revision:
-



Legend:

- Site Location
- Park & Stride Locations
- Site to Shoppers (Blue) Car Park
- Site to Heathside Crescent Car Park
- Site to Manor Way Car Park

north

Assumed walking speed: 5km/h

motion

9 Greyfriars Road Reading, RG1 1NU
T: 0118 206 2930

www.motion.co.uk

Project:
Land South of Kingfield Road and East of Westfield Avenue

Title:
Park & Stride Walking Routes

Figure:
Figure 5.5

Revision:
-

Appendix A

Illustrative Masterplan

(Extract from Appendix J of Transport Assessment)

LeachRhodesWalker Architects
Ground Floor West 50 Dearmans Place Manchester M3 5LH t 0161 833 0211 e info@lrw.co.uk www.lrw.co.uk

7884 Cardinal Court Inc. Woking Football Club : PROPOSED BASEMENT LEVEL (COLOUR)

Scale: **1:500@A1** Auth By: **CJG** Drawn By: **IS** Date: **06.11.19** Dwg No: **7884-L(00)283D**

Appendix B

Woking Football Club – Attendance Data

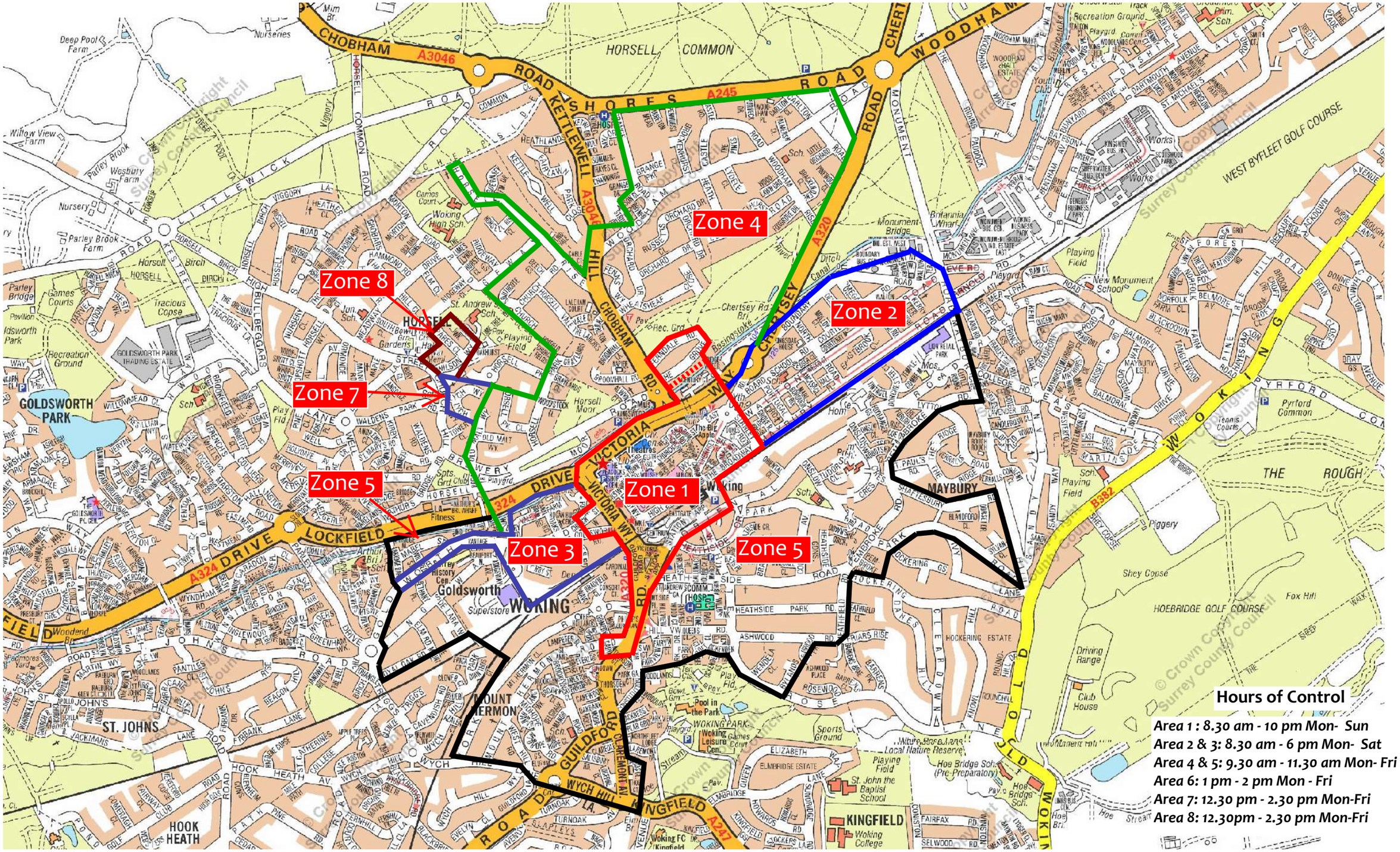
Woking Football Club - Matchday Attendance Home Legaue Games 2019/2020 Season

Matchday	Opponent	Attendance
Tuesday 6th August	Aldershot	3922
Saturday 10the August	Harrogate	1470
Satuday 24th August	Solihull	1997
Saturday 31st August	Barrow	1787
Tuesday 3rd September	Torquay	2599
Saturday 14th September	Ebbsfleet	1942
Saturday 28th September	Boreham Wood	2219
Satuday 5th October	Wrexham	2061
Saturday 26th October	Eastleigh	1910
Tuesday 29th October	Notts	2175
Saturday 16th November	Halifax	2242
Tuesday 26th September	Bromley	1769
Saturday 7th December	Hartleppol	2127
Thursday 26th December	Sutton	2257
Saturday 4th January	Chorley	1748
Saturday 25th January	Yeovil	2642
Saturday 22nd February	Stockport	2189
Saturday 29th February	Maidenhead	2019
Tuesday 10th March	Barnet	1486
	Average Attendance	2135

Appendix C

Woking Controlled Parking Zone Map

Woking CPZ Map



Appendix D

Woking Football Club – Current Park & Stride

Woking Football Club, The Laithwaite Community Stadium, Kingfield, Woking, Surrey, GU22 9AA • 01483 772470

DirectionsToWoking

By Car

The ground is situated on the A247, opposite the entrance to Woking Park, midway between the town centre and Old Woking. Leave the M25 at either junctions 10 (Wisley) or 11 (Chertsey) and follow the signs towards Woking. When nearing the town centre follow the brown signs showing Heathside car park. The ground is about 15 minutes' walk from the car park. Come out of the car park and follow the signs for Woking FC (the first route described below for rail travellers). Travelling supporters are requested to use Heathside car park as there are no parking areas around The Laithwaite Community Stadium.

It has been brought to our notice that cars parking in Westfield Avenue have been subjected to parking tickets, this also applies to cars parking on the grass verge near the ground. We therefore suggest that you try to park elsewhere to avoid this happening to you.

By Train

If you are travelling by train, there are frequent fast services from Waterloo to Woking, with a journey time of about 28 minutes (but check for weekend engineering works!). The ground is about 15 minutes' walk from the railway station, which is in the town centre.

Leave the station by the exit on platform 5. You then have a choice of two routes. You can either follow the signposted route ahead of you down White Rose Lane or turn immediately right along the station approach road to take the more direct route.

If you take the first, more scenic, route, go straight ahead across the car parking areas and along White Rose Lane until you come to the pedestrian crossing. Go across Oriental Road and then, further on, cross over Heathside Road. Carry on down White Rose Lane (admiring well-heeled leafy Surrey!) until, about 75 yards past the turning for Ockenden Road, you reach the entrance to Woking Park on

Appendix E

Heathside Car Park – Occupancy Data

Heathside Car Park - Occupany Data

Heathside	09:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00
06/08/2019	342	389	406	609	402	393	365	300	196	64	90	55	80
07/08/2019	341	382	403	431	405	385	315	250	220	176	43	87	70

Heathside	09:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00
15/02/2020	45	66	73	69	69	89	93	92	87	74	70	61	58
22/02/2020	40	50	46	77	97	99	101	95	65	59	57	52	48