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9th March 2011

Dear Sir,

**Planning Application Number 11/00204/FUL
Area Housing Office, Youth Centre and Car Park Site, Parkville Road, Swaythling,
Southampton
Transport Assessment**

I object to the above planning application on the grounds that the Transport Assessment undertaken for the above Application is flawed to the extent that it cannot be used in support of the development.

The current Transport Assessment was prepared by Odyssey Consulting Engineers, report reference Project No. 10-150 Feb '11 Rev A. The report relies heavily on an earlier Transport Assessment prepared for Planning Application 08/01489/FUL. There are a number of reasons why reference to the earlier report are invalid plus the report as written contains a number of serious omissions and errors.

Student Agreement re. car use

Being able to prevent student use of cars resident in the development is fundamental to the validity of the Traffic Assessment. There is no detail in the planning application of the wording of the agreement that students residing in the development would sign not to bring a car to University. Whilst the University may be able to enforce such an agreement within the site, it would not be possible in practice to enforce such an agreement outside the site – and this was acknowledged in a telephone conversation between Daniel Hopgood and Helen Harley, of Southampton University External Relations at 10.45 on 2nd March 2011, based on Helen's experience elsewhere in the University. The lack of practical enforcement measures means that abuse of the no car

agreement is inevitable and that additional trips and parking provision would occur that have not been assessed. As a result, the Traffic Assessment as presented is not valid.

Trip Generation and Distribution

Table 5.3 shows the predicted student accommodation vehicle trips, based on other sites selected from the TRICS database. This data shows that 21 student trips by car as driver occurring in the morning peak are expected. Since there is no on-site parking for student cars, these movements must start and end off the site. The TA as written therefore assumes that overspill parking for students would result from the development, contrary to the statements that it would not take place elsewhere in the TA.

Table 5.4 shows the anticipated vehicle trips for medical use in the AM peak as 46 arrivals and only 16 departures, a difference of 30, more than the total parking available on the site. This is not possible, so an error in the analysis exists.

Table 6.1 (labelled as Table 5.6) Total Gross Vehicle Trips on page 26 of the current TA records 89 arrivals and only 49 departures in the AM peak, a difference of 40, more than the total capacity of on-site parking. This is not possible, so the information used to compile the table is in error.

The total difference between arrivals and departures in the AM peak hour for student, retail and medical use is $5+30+5 = 40$ movements. This would indicate that there is a shortage of at least $40-24=16$ car parking spaces within the development for this period, which is contrary to the statements elsewhere in the application that the parking provision is self-sufficient for the new development. The TA needs to be revised to explain the discrepancy.

The TRICS data for generated student trips by car to and from the development are unrealistically low. The data suggests that only one journey as a passenger would exist by students in the peak hour. It is likely that a proportion higher than 0.38% of students would have access to a vehicle providing a lift to or from college during these periods. Short term parking for such journeys inside or outside peak times has not been provided in the development. If the delivery layby were used for such journeys it would result in the requirement for deliveries outside normal hours, causing a noise nuisance.

The TRICS data uses traffic data from other student halls of residence as an example of the traffic effects. The only local one of the 4 sites chosen is for Halls of Residence on Sleepers Hill, Winchester. The attached press cutting from November 2009 from The Daily Echo gives information regarding the parking issues as a result of this development, which is a catalogue of problems for local residents, which resulted, amongst other things in a local resident blocking a road for 3 hours as the result of nuisance parking. This is evidence that using traffic data for such a site could lead to similar problems generated for this site.

Parking Provision

The earlier application provided 25 spaces for 609.5m² of retail space. The current proposal provides 10 spaces for 700m² of retail space, but the Transport Assessment has not been revised to reflect the increased parking demand and reduced capacity. Para 5.14 states “*The retail use on the site is largely unchanged from the Consented scheme. In this regard, it is again it is considered appropriate to retain the trip rate assumptions from the previous TA.....*”. The increased retail area between the two applications demonstrates this statement is inaccurate.

The earlier application provided 20 medical staff parking spaces in a dedicated basement parking area. The current proposal provides no medical staff parking, but the Transport Assessment makes no mention of any reduced demand or alternative parking provision for medical staff. Without measures to protect medical staff parking – of which there are none in the proposal – it would be highly likely that essential medical users would not be guaranteed parking in the development, putting emergency medical provision in the area at risk, which is completely unacceptable. The parking provision for medical use must be further explained for the application to be credible.

The planning application provides zero motorcycle parking provision. SCC’s policy on parking provision requires 1 m/c space for every 25 car parking spaces. 24 parking spaces are proposed which would indicate at least one motorcycle space would be required. A more serious concern however is that the application relies heavily on the University’s imposition of a policy for zero parking provision for cars. No mention is made in the application of a site specific policy for motorcycle parking. Current University practice at existing halls allows unrestricted motorcycle parking, so with no special provision this would be the case at this site. Due to the congested nature of the site this is likely to lead to a motorcycle parking nuisance in and around the site. The application needs to be amended to make clear what restrictions would be placed on student use of motorcycles at the site.

Existing Parking Restrictions

Para 6.19 states that “*The area is subject to on-street parking restrictions, principally in the form of yellow lines or clearways*”. This is a misleading statement, since these restrictions apply only to Thomas Lewis Way and Stoneham Way. There are no parking restrictions in the residential streets which surround the development and which would experience any overspill parking. This clause could be reworded to clarify the true situation.

Para 6.19 goes on to say “*In the wider area, residential controlled parking zones operate*”. This statement is misleading, since the nearest residential controlled parking zone is 160 Honeysuckle Road, which is 750m away from the development. Any overspill parking would occur much closer to the development and inevitably cause disturbance to local residents. This paragraph should be reworded to clarify the

situation. A statement should be included advising of the effect of the “*car parking constraint*” that will occur as stated in Para 6.17 on the surrounding area in the absence of parking restrictions in the surrounding area.

Required Parking Restrictions

The Minutes included with the Design & Access statement record there are concerns for vandalism of medical staff parking off site. This shows that those preparing the documentation concede the development would not be self sufficient for parking. The reduction in medical staff parking from the first planning permission is 20 spaces. The loss of existing parking amounts to 55 spaces – although this is under –used. The staff for the proposed retail and student development will need parking. Any abuse of the no parking provisions by students would result in overspill. The combined effect of these issues would bound to be a massive demand in the wider area. No parking restrictions exist in the residential area around the site, so parking in these areas would be unrestricted. The capacity does not exist in the surrounding area to absorb such a high volume of parked vehicles without causing extensive nuisance parking and would make parking unavailable for residents. No measures to deal with this problem are proposed and so the development would create a massive problem in the area where none exists.

The only mitigation possible would be to introduce resident’s parking zones, which introduces hassle and cost for residents for no benefit to them – and the system is still open to abuse. No such provision is proposed as part of the development.

Vanessa White of SCC Highways agreed it would be difficult to operate residents parking zones in all areas – notably the Conservation Area of Ethelbert Avenue. This is a public right of way, but not maintained at public expense. Allowing a conservation area to be subject to excessive levels of parking caused by approval of a development that causes such a nuisance would devalue the appearance of the conservation area, contrary to Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 placing a duty on Local Authorities to preserve and enhance the land within a designated conservation area. Introduction of signs for a residents parking zone within the conservation area would themselves devalue the character of the area and it is debateable whether the restricted areas could be adequately defined.

Students Joining and Leaving Halls

The report acknowledges in Para 6.21 that the site would experience periods of exceptional demand as students join and leave the building. The report makes the assumption that this exceptional demand would occur on two weekends a year – at the start and end of the academic year in September and May. The reality is that students often return home at the end of the autumn and spring terms as well, meaning the parking demand as a result of this issue has been seriously under-estimated. The

assessment should be revised to include these additional periods of exceptional demand.

Para 6.23 states that at the times of peak demand, all the on-site parking would be available for student use. How this would affect the retail, community and medical users of the site is not made clear. This should be explained – and if the other uses remain in operation, the traffic and parking impacts properly taken into account in the TA.

The TA states that students arriving by car would be given a 5 minute arrival slot time, advised in advance. Since many students will be travelling a long distance, arrival times will vary greatly resulting in vehicles arriving in the area outside their designated slot. There is no explanation of where this traffic would wait. It is likely that there would be an impact on parking in the surrounding area for this traffic which needs to be assessed.

Para 6.24 states “full details” of the approach to managing the car parking at the times of exceptional demand is stated as being contained in the submitted car park management plan. There is a document included within the application called “Building Management Plan” and it is assumed for this letter that this is the document being referred to. The building management plan contains a single paragraph on this subject, containing contradictory information to the TA. The statement “*When students are moving in and out of halls they will be asked to get dropped off at the university where a bus will shuttle them to the halls along with their belongings*”. Clarity is required as whether this is additional to or instead of the provisions in the TA.

The TA takes no account of the loss of existing parking demand within the development site which is acknowledged to exist in para 5.1: “*This (current usage) is clearly well below the maximum potential of the site usage, in particular the public car park, but reflects the level of demand for such a facility in this location*”. The effect on the loss of existing parking that would result from the development must be assessed for the TA to be credible.

All of the overspill student parking requirement would need to be absorbed by the surrounding streets, causing a nuisance and safety issues for existing residents

Bus Access

The U1 service is the main service that would be used by students using the development. Para 3.23 states that “*the nearest stop to the site being c. 450m south on Langhorn Road. Although this is outside the standard 400m walk distance to bus stops, being student accommodation it is considered that a 450m walk is reasonable and would not discourage use of the service.*”

The Langhorn bus stops are in fact between 495 and 575m from the site when measured on a map, dependent on whether the trip is incoming and outgoing and

whether the trip is made by night, when according to the Building Management Plan the only pedestrian access will be at the north east corner of the development. The 400m standard distance comes from the DfT Inclusive Mobility document, but what the TA fails to state is that this distance should be reduced for differences in elevation by 10m distance for every 1m difference in elevation. There is a difference in elevation of 5m between the development site and Langhorn Road bus stops, which reduces the standard walking distance by 50m to 350m. This seriously compromises the assumption made in the report that there would be no effect on desirability by students to use this bus stop. Further factors not considered that reduce the desirability of bus use are the self-catering nature of the development, which would mean students carrying heavy shopping bags and also the low quality of the bus stops – with no shelters and minimal footpath widths. These factors should be taken into account and mentioned in the application.

I consider the errors and omissions raised herein are sufficiently serious for the current planning application to be refused.

Yours faithfully,

D.W.J Hopgood

B.Eng (Hons), C.Eng, MICE, Chartered Highways and Infrastructure Engineer

Enclosures : Press Cutting, Daily Echo, November 2009



Community's anger of student parking

1:20pm Saturday 28th November 2009

FED-up residents in Stanmore have hit out at students for "destroying" their community.

They accused undergraduates of causing noise disturbances into the early hours and exacerbating parking problems.

But students have hit back saying not all of them annoy their neighbours and that they have as much right to park in the area as anyone else.

Annette Hancock, of Stuart Crescent, was one of 200 householders at a special meeting in Stanmore last Thursday (November 19) evening.

"Even if I could afford to buy my property I wouldn't want to live here," she said. "It's got so stressful, it's not our community anymore."

Tony Chamberlain said students gathered on a play area behind his home in Woolford Close and make a noise until 3am.

"People are fuming about it," he said. "I have got to the stage where I just want to take the law into my own hands.

"I have three cars but we park them in a sensible manner but the students park them up the kerbs and on grass verges."

Their complaints come just weeks after a resident blocked Stuart Crescent for nearly three hours to protest about parking problems.

Student Amanda March, 21, of Thurmond Crescent, said: "I would consider that myself and my housemates are good people but we're all being tarred with the same brush, not all students are bad.

"I thought I had settled into the community and I was respected but today I feel slightly victimised and that students are all bad.

"We understand the parking issues but we have been told on our discussion table we shouldn't have cars," she added. "We feel at the end of the day we're still residents of Stanmore, the same as they are."

Her housemate, Sarah Watson, 22, said: "There's so much animosity now, I think everyone's going to hate us until there's no students left in Stanmore."

Tommy Geddes, the University of Winchester's deputy vice-chancellor, delivered a stark message to a packed gathering at Stanmore Family Church.

"There's nothing you can do to stop students parking on Stanmore streets unless you have residents' permits," he said. "That's the hard but true fact.

<http://www.dailyecho.co.uk/archive/2009/11/28/News+-+Winchester/4761200.print/> 10/12/2010