

February 2019

Assessment of Alexpo Parking Report and Transport Assessment

HAMPTON COURT RESCUE CAMPAIGN

Parking Policy and Provision - Hampton Court Station Site 2018/3810

This paper reviews the Transport Assessment and Parking Report submitted by Alexpo with respect to planning application 2018/3810 and also assesses the likely demand for parking spaces in the submitted scheme.

1.0 Background

The Hampton Court Station site has high levels of congestion, high levels of pollution and is adjacent to Hampton Court Palace, one of Britain's most important tourist sites which attracts large numbers of visitors, particularly in the summer months from May to September. By any measure this is a complex site.

The submitted scheme (2018/3810) differs from the approved scheme (2008/1600) in that it has a significantly larger hotel (84 rooms versus 46), more apartments (97 versus 66) and a car park with 207 spaces versus 287 in the smaller approved scheme. The other obvious variation is that in accordance with Council policy the approved scheme (2008/1600) permanently allocated reserved parking spaces to the care home and residential units, whereas the proposed Alexpo (2018/3810) scheme relies on a constant recycling of parking spaces and an extremely optimistic forecast that the different types of users will not significantly overlap to the point where there are insufficient spaces available.

The Alexpo Transport Assessment and Parking Report both seek to convince the Council that the scheme can justify the addition of a very large development on a compact site without increasing parking over and above the existing provision of 205 spaces.

2.0 Site Characteristics

The Alexpo Transport Assessment notes (see page 4 para 2.13) that:

"..the site has good transport links with Hampton Court Station being located within the Site and providing mainline rail services to London Waterloo. Five bus stops are situated within 150m of the Site".

Reality Check No 1

Local residents are aware that while there is a half hourly train service to London, travel to surrounding towns such as Kingston or Walton requires a long and circuitous route into London (for example, via New Malden or Clapham Junction) and we are also aware that the quality and reliability of the Hampton Court branch line is poor and declining. It is also very evident that year on year Surrey County Council (SCC) are reducing the frequency of buses and the number of routes covered. Given forecast budget cuts and the current demographic trend of an ageing population and the associated public sector health care costs we expect the long term trend of declining bus services to continue. This will have a significant impact on travel to and from the site. We also note that coach parking will be removed from the site. For all of these reasons we ask decision makers to consider very carefully this application with reference to rail and bus infrastructure that is struggling to cope and with no reasonable indication that it will improve in the medium term. Claims with respect to sustainability need to be tempered with the harsh reality of an under-performing transport infrastructure.

3.0 Planning Policy

3.1 National Planning Policy

Page 5 of the Alexpo Transport Assessment quotes paragraph 8 of the National Planning Policy Framework which states:

“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
- c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

Reality Check No 2

We are disappointed that the Alexpo Transport Assessment omitted the subsequent paragraph in the NPPF guidelines which states:

These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

Our view is that the site has unique characteristics that cannot be ignored. These are:

- A high level of seasonal parking demand from visitors to Hampton Court Palace.
- An underperforming branch line rail service.
- Inadequate and declining bus services.
- Very high levels of congestion and pollution.
- Removal of coach parking.
- Increased commuter parking in surrounding roads.

3.2 Surrey County Council Policy

The Alexpo Transport Assessment (page 7) quotes Surrey County Council's Vehicle and Parking Guidance, January 2018:

Surrey County Council's Vehicle and Parking Guidance, January 2018 notes the following: 'It is widely recognised that the availability of car parking has a major influence on the means of transport people choose for their journeys. It is therefore essential to try and get the balance right, by providing an appropriate level and type of parking, protecting highway safety and promoting transport sustainability. This guidance recognises that Surrey produces varying demand for travel and car parking, and its resultant car parking requirements. It would be inappropriate to apply a single standard across the entire county, so the intention is to apply a pragmatic and flexible approach.'

Reality Check No 3

The Alexpo Transport Assessment omits the subsequent paragraph from SCC's guidance which states:

Surrey exhibits a wide range of social and economic circumstances that necessitate a flexible approach to identifying appropriate levels of car parking provision. Such an approach should provide a level of accessibility by private car that is consistent with the overall balance of the transport system at the local level.

We note that the Council does have some room for discretion when determining the adequate parking provision on large complex schemes but also suggest that any variation outside of recommended provision will require credible parking surveys including an assessment of existing parking stress and realistic forecasts of future parking demand. Where there are very obvious factors which point to increased stress and increasing demand the Council is encouraged to err on the side of caution.

3.3 Elmbridge Council Policy

Moving on from Surrey's guidance the Alexpo Transport Assessment (page 9) quotes Elmbridge Council's Development Management Plan DM7 which defines policy for parking:

In respect of parking the DMP states:

- i. *The proposed parking provision should be appropriate to the development and not result in an increase in on-street parking stress that would be detrimental to the amenities of local residents.*
- ii. *Garaging, cycle stores and car parking designs should be integrated into the scheme and respect the character of the area.*
- iii. *Hardstanding should be designed and constructed with permeable (or porous) surfacing. Impermeable paving should be limited and the use of soft landscape maximised.*
- iv. *Provision of car, cycle and disabled parking should accord with the Elmbridge Parking Standards at Appendix 1.'*

Reality Check No 4

Given that the Alexpo Transport Assessment lists sequential paragraphs it is reasonable to assume that it would quote all text verbatim. However where the Alexpo Transport Assessment refers to:

The proposed parking provision should be appropriate to the development and not result in an increase in on-street parking stress that would be detrimental to the amenities of local residents.

The Alexpo Transport Assessment omits the subsequent sentence which states:

“In such instances, a minimum provision of one space per residential unit will be required”.

This highly selective and misleading reference to relevant planning policy is a constant theme throughout the Alexpo Transport Assessment and Alexpo Parking Study and very significantly undermines the credibility of the reports to such an extent that both documents should be withdrawn by the applicant, certainly they shouldn't be treated as reference documents.

The Alexpo Transport Assessment continues to detail parking standards as set by Elmbridge and Surrey Council and makes reference to:

Surrey County Council (SCC), Vehicle and Cycle Parking Guidance, January 2018 • Elmbridge Borough Council (EBC), Development Management Plan, April 2015 (page 9 para 3.24) it states:

Both documents specify the upper limit of car parking numbers that a development may provide. Both documents use similar parking ratios. They provide flexibility for the authority in agreeing an appropriate level of parking on a case by case basis. Both include provision for lower car parking provision and the consideration of zero parking for accessible urban developments to help encourage reduced reliance on the private car and promote use of alternative modes of transport and to assist reducing traffic congestion and to improve air quality. This is with the proviso that parking stress on the neighbourhood will not unduly be increased.

Reality Check 5

There is no reference within Surrey County Council Vehicle and Cycle Parking Guidance, January 2018 to upper limits for residential parking and where Elmbridge policy refers to lower levels of parking (DM7 paragraph 2.25) this is in relation to “certain town centre developments”, which this scheme clearly is not, nor is it an “urban development”. Elmbridge and SCC do specify upper limits for commercial sites, such as retail, food and drink, industrial, care homes etc., where maximum levels are set, but not for residential sites.

For residential sites (EBC and SCC) guidance sets recommended levels as:

Locational Characteristics	Town Centre	Edge of Centre	Suburban	Suburban edge/Village/Rural
1 & 2 bed flats	1 space per unit	1 space per unit	1 space per unit	1 space per unit
1 & 2 bed Houses	1 space per unit	1 space per unit	1 + space per unit (note 1)	1.5 + spaces per unit (note 1)
3 bed houses	1 space per unit	1 + space per unit (note 1)	2 + spaces per unit (note 1)	2 + spaces per unit (note 1)
4 + bed houses	1 space per unit	2 + spaces per unit (note 1)	2 + spaces per unit (note 1)	2 + spaces per unit (note 1)

Notes on Figure 1

1. Where space permits, it may be appropriate to consider increased provision.
2. Reduced or even nil provision may be appropriate in support of demand management and the most efficient use of land.
3. Allocated or unallocated parking may be acceptable where appropriate.
4. Unallocated parking should be available only to the proposed development.
5. Visitor parking is encouraged where appropriate (eg: flats) though is not always necessary.
6. Garages, open carports and/or car barns are acceptable subject to good design. It is acknowledged that in certain locations garages may be used for purposes other than parking. The appropriate size and provision of garages is considered to be a matter for the local authority.

Quoting Elmbridge guidance on parking provision in The Development Management Plan and DM7 the Alexpo Transport Assessment (page 10) states:

EBC: 1 bed flat, maximum of 1 car parking space per unit; 2 bed flat, maximum of 1.5 car parking spaces per unit; 3 bed flat, maximum of 2 car parking spaces per unit;*

**there is no minimum number of spaces.*

Reality Check 6

The asterisk “inserted” by Alexpo suggests that Elmbridge has a policy that there is no *minimum* parking provision. As with SCC, Elmbridge are actually silent on minimum levels and to suggest otherwise is to deliberately mislead.

What Elmbridge's Core Policy does state is:

b. Parking

i. The proposed parking provision should be appropriate to the development and not result in an increase in on-street parking stress that would be detrimental to the amenities of local residents. In such instances, a minimum provision of one space per residential unit will be required.

i. Garaging, cycle stores and car parking designs should be integrated into the scheme and respect the character of the area.

ii. Hardstanding should be designed and constructed with permeable (or porous) surfacing. Impermeable paving should be limited and the use of soft landscape maximised.

iii. Provision of car, cycle and disabled parking should accord with the Elmbridge Parking Standards at Appendix 1.

c. Public car parks

i. Public off street parking will continue to be provided where it supports the economic or recreational use of the immediate area and provides dual use allowing parking for residents and shoppers/employees, particularly in town centres.

ii. New park and ride proposals will be assessed against their impact on highway capacity, traffic congestion, amenity of local residents and land within sensitive designations, together with the potential benefits to the provision of sustainable transport links.

iii. The Council will encourage the improvement and retention of station car parking unless the existing provision exceeds the need or the redevelopment would re-provide sufficient lost spaces.

iv. The cumulative impact of changes to station car park provision will be considered in terms of the possible knock on effect with regard to the impact on number and length of car journeys, increased demand on another train station or impact on traffic safety, congestion or residential amenity in surrounding streets.

The Alexpo Car Parking report makes reference to SCC's 2014 Parking Policy in LTP3 (Long Term Transport Plan) and suggests:

Provision of excessive parking capacity at the site would be contrary to SCC's vision set out in their LTP3 of people meeting their transport and travel needs sustainably. It would also be contrary to SCC's sustainable transport objective of providing an integrated transport system that protects the environment, keeps people healthy and provides for lower carbon transport choices.

Reality Check 7

This is a convenient interpretation for Alexpo but does not reflect SCC's stated policy. We note SCC's 2018 guidance which states: (see page 2: Surrey County Council's Vehicle and Parking Guidance, January 2018):

It is unlikely that objections would be raised on amenity grounds of a shortfall in parking, or if parking in excess of residential guidance were being provided. Excessive parking provision in residential development is unlikely to generate travel by car; unless it is also used by other more restrained land-uses, where restraint might have been applied in that locality. There is no policy to restrict car ownership so there is little to be gained in heavily restraining residential parking.

With respect to Station car parks EBC's DM7 (para 2.32) states:

Many people living in Elmbridge commute to London using the train stations across the Borough. Located away from the majority of town and village centres and some residential areas, station car parks are essential to their daily journeys to and from work. This policy seeks to ensure that these car parks are retained where necessary and that the impact of any change in parking provision is assessed strategically across the Borough.

We also note that MTR First Great Western has a franchise mandate to increase its total suburban parking provision by 1500 spaces over the life of their franchise and that Elmbridge and SCC's (note 3 above) residential parking policies state (DM7 paragraph 3.11):

Allocated or unallocated parking may be acceptable where appropriate. Where parking is not allocated it should only be available to residents in the proposed development.

In terms of the number of spaces and the failure to allocate spaces, Alexpo's residential parking provision does not comply SCC and EBC (DM7) policy.

In summary, Elmbridge and SCC recommended guidance for parking is that for 1 & 2 bedroom flats there should be 1 space per unit. There is no specific guidance for 3 bedroom flats but based on SCC and EBC's guidance we are assuming one space with the proviso listed that (see note 1 above): "Where space permits, it may be appropriate to consider increased provision". Policy is that space must be allocated to residential users. We are deeply troubled by the litany of mis-quotes and misleading references to relevant policy in the Alexpo Transport Assessment and Alexpo Parking Study and again request that the applicant withdraws both documents.

4.0 Car Parking Surveys

HCRC endorses the detailed assessment of the Alexpo Parking surveys undertaken by RPS Group as submitted in Historic Royal Palace's response to the application.

To accurately assess peak rail travel demand, station car park use and pedestrian traffic flows any survey will reasonably need to include the following characteristics:

- 1) Be current (last two years to capture growth of visitor numbers to HCP).
- 2) Include week days and weekends.
- 3) Include summer months from late May to September.

- 4) Record data throughout the day and in particular after 10:30am to accurately reflect the demand for parking from visitors to Hampton Court Palace.

Given the high levels of commuter and HCP visitor parking in surrounding roads any credible analysis of the impact of this scheme (parking provision and road layout) requires robust analysis of the existing and future “parking stress”. The correct methodology to assess “parking stress” is widely acknowledged to be the Lambeth methodology which we would encourage the applicant to undertake. See for example: <http://www.pma-traffic.co.uk/services/Traffic-and-Parking-Surveys>

Parking surveys by Watermans were undertaken on the following dates:

- 1) 2013 Weds 20 March, Thurs 21 March, Saturday 23 March
- 2) 2015 Thurs 26 Feb
- 3) 2015 Sat 25 April
- 4) 2018 Tues 10 July
- 5) 2018 October 2018 – travel survey

4.1 Validity of Parking Surveys

The parking surveys use different methodologies which makes comparisons difficult. Our comments on the respective surveys are:

2013 Surveys

Surveys appear robust covering a full day 09:00 to 20:00. Surveys also have value given that they cover weekdays and weekends, however parking demand in winter with very few visitors to HCP will significantly under-represent realistic parking demand. Surveys are now almost six years old and have very little relevance, but could be useful as a benchmark if they are updated and include summer data using the same methodology.

2015 Surveys

The surveys are helpful in that they include a weekday and Saturday, but are now four years old. Given that they omit summer months, data will under-represent demand from HCP visitors.

2018 (10 July) Surveys

Survey is useful given that it was undertaken in summer but would have been substantially more credible if it also included weekend data.

2018 (October) Surveys

Survey uses different methodology has a number of systematic errors which renders data invalid.

We note that Your Shout (who undertook the data collection) is not a member of the Market Research Society (MRS) which is the relevant industry body which sets governance standards and a code of conduct for this industry. The team leader for the Your Shout research (Richard Patient) who was gathering data at Hampton Court Station is also the owner of Thorncliffe Ltd who are employed by Alexpo to lobby Elmbridge Councillors

and public to support this scheme. They have a website to this end which accepts letters of support which are fed through to Elmbridge Council.

We also note that:

- Your Shout facilitated the public consultations on behalf of Alexpo and is a “brand” associated with the developer – this will create bias and influence responses.
- Respondents who park in surrounding roads will know that there is pressure from local residents for a CPZ and they will therefore be reluctant to respond that they drive and park in local streets.

Data was collected in October from 5:30AM until 9:30 which ensured that it excluded visitors to HCP.

- Fieldworkers wore Your Shout caps which will influence results.
- There was a major flaw in the Your Shout methodology. The key question in the research was:

Q1 How did you get to the station this morning?

- The only possible responses accepted by Your Shout were: Got dropped off/Came by bus/Walked here/Cycled here/Parked your car?
- If a respondent replied that they walked the interview was terminated.

This methodology will produce significant data errors and bias. Where a respondent parked in a surrounding road there is a high probability that they would have responded that they walked. The survey could have rectified this error by including an option of: Parked on surrounding road and walked.

For all of these reasons no reliance should be placed on the Your Shout survey. We also question the conclusions drawn from the parking surveys.

Page 8 of the Parking Report states:

It is expected that rail demand at Hampton Court Station will remain broadly at existing levels for the current planning period.

Reality Check 8

The applicant is aware that long term rail passenger numbers post 2008 have grown year on year and that visitor numbers to Hampton Court Palace are growing at some 10 percent per year.

Page 14 of the Alexpo Parking Report (para 6.3) states:

Surveys show that the typical existing peak occupancy on a weekday in the existing station car park is around 93 vehicles. This might include a number of non-rail users but their number is likely to be minimal.

The premise that there are “minimal” numbers of non-rail users is directly contradicted by years of empirical evidence and by Network Rail’s correspondence with the Office of Rail and Road, submitted with the temporary parking application 2018/3803, which mirrors actual summer car park usage. The letter states:

The existing station car park can accommodate approximately 200 cars, Network Rail has stated that on weekdays it is approximately 60 % full and used by railway users and non-railway users. As weekends 90 % of the capacity is used, mainly by non-railway passengers visiting Hampton Court.

This false premise reinforces HCRC’s assertion that the applicant’s parking surveys are both inaccurate and misleading and need to be undertaken by an independent professional organization using rigorous methodology. Based on the methodology employed and the conclusions drawn we question whether Waterman’s or Your Shout have the required skill set to complete this task.

Given that the parking surveys included data which is out of date, lacking in coverage (seasonality and time periods) and at times collected with flawed methodology and very likely high levels of bias we question whether this application can reasonably be determined based on the reports submitted.

4.2 Hotel Users

The Alexpo Parking Study suggests that only 27 per cent of the hotel rooms will require parking, however for the 84 beds they suggest that in terms of vehicle movements there will be 78 arrivals and 83 departures between 06:00 and 21:00. These numbers cannot be reconciled with the predicted demand for 23 spaces.

We note the Your Shout Summary document makes reference to the hotel and states:

With so many visitors to Hampton Court Palace every year, a hotel is essential to provide for this growing need – this has 84 bedrooms. Located next to a station, it’s an ideal spot.

Reality Check 9

While the Alexpo Transport Assessment states that hotel users will park predominantly at night Your Shout Summary document highlights the value of the hotel to visitors to Hampton Court Palace but then tables the lowest demand for hotel parking at 2pm. This is not credible and we also point to a conflict with breakfasting guests versus early morning commuters.

The Alexpo Parking Report (see page 15) provides a sample of 4 hotels drawn by Watermans from the TRICS database and suggests:

These hotels are considered to be satisfactorily representative of the proposed hotel in scale, type, location and parking demand.

Holiday Inn Bexley	107 rooms	158 on-site parking spaces
Novotel Greenwich	151 rooms	36 on-site parking spaces
Days Hotel Hounslow	96 rooms	15 on-site parking spaces
Etap Hotel Hounslow	148 rooms	34 on-site parking spaces

Reality Check 10

Based on the data in the Alexpo Transport and Parking reports we assumed that the authors trawled the TRICS data base until they found hotels with low levels of parking provision. In order to test this assumption we contacted the four hotels in the sample and note the following:

- Holiday Inn Bexley has 1.5 spaces for every room.
- Greenwich Novotel is located 3 minutes from the 99 space Burney Street secure car park.
- The two Hounslow car parks are 2-3 minutes walk from the Treaty Centre which has a **650 space car park**.

We are disappointed that the authors ignored this data suggest that Alexpo's assessment of hotel car park demand and should be set aside.

5.0 Car Park Management

On page 14 the Alexpo Parking Report (para 6.7) states:

The Applicant proposes that 58 annual parking permits are made available to residents at a charge. If all of these permits are purchased this would equate to a parking ratio of 0.6 residential permit parking spaces per unit. This provision is below the maximum parking provision permitted by the local parking standards set out in Section 5.

And also confirms:

- *Parking spaces will not be sold with the residential units.*
- *Residents will be able to apply for a season ticket for parking, but numbers will be limited. The availability of these season tickets will be secured in an agreement with Network Rail and the train operating company.*

We also note the Your Shout Summary Document lodged with the application which states:

We're making more car parking permits available to the homes than the approved scheme.

National planning policies suggest we should be aiming for no car parking here at all for residents. However, local people have told us that providing parking for residents is vital. Instead, there will be up to 58 car parking permits for residents, allowing all two and three bed homes to have a space. Our car parking ratio of 0.6 per unit is higher than in Gladedale's approved scheme.

Page 10 of the Parking Report states:

The car park is privately owned and there is no obligation on Network Rail to make the car park available for general public use but they do so to optimise the commercial performance of the car park.

Reality Check 11

Network Rail who own the freehold of the car park is a public sector organisation who operate a public car park. There is no mention in any of the application documents to suggest that the car park will not remain a public car park and to suggest otherwise is to mislead.

This is confirmed by paragraph 6.17 (page 16) of the Alexpo Car Parking Report which states:

The car park will be open for the public to use provided they pay the appropriate fee on the day. This may include staff for the commercial uses at the development. As with the existing car park, it will be available for use by all visitors to the area. A specific parking allocation for these users is not proposed

Reality Check 12

The 58 parking permits will not be allocated and therefore breach EBC's DMP7. They represent a lower cost alternative for residents to buy parking permits and nothing else. The statement suggesting that the 58 permits exceed the parking ratio (which allocated spaces) in the Gladedale scheme is spurious and misleading. The suggestion in the Your Shout summary document quoted above that national policies suggesting "no parking" is spurious in relation to this location.

5.0 Proposed Car Parking

The 2008/1600 approved scheme included a 287 space car park with dedicated spaces for the care home and residential apartments, whereas the Alexpo scheme will have 207 spaces which is **only** two more spaces than the existing car park. To manage the car park Alexpo's Car Parking Report (page 3) notes:

There will be no dedicated spaces for the various users of the car park.

The users of the car park will be:

- *Rail users.*
- *Residents of the new development and their visitors*
- *Staff and visitors of the development. .*
- *Hotel residents*
- *General public*

We note that Alexpo Parking Study makes reference to the "General Public" but ignores specific reference and analysis of Hampton Court Palace (HCP) where visitor numbers have grown from 490,000 when the 2008/1660 scheme was approved to the current level of over one million and with growth in excess of 10 per cent in 2017. We also know that some fifty percent of HCP visitors travel by rail and these constitute approximately fifty percent of total rail passengers using Hampton Court Station. This data points to a growth in demand for car parking at this site which contradicts Alexpo's assertion that demand is unlikely to grow.

7.0 Estimated Car Park Demand

Based on our empirical experiences living in East Molesey for the last twenty plus years, and our research with similar hotels and mini-supermarkets we have estimated the likely car park demand of the proposed car park. Our assumptions are:

- HCP Visitor numbers are heavily weighted to the summer.
- Data is for maximum realistic level at any point in time.
- Residential car ownership levels are 60 cars per 97 apartments which may be overly optimistic and could increase to 70 plus cars (we note that Alexpo assign 58 permits to residential).
- Hotels users are split 45% business, 45% visitors to Hampton Court Palace and 10% other.
- Staff numbers requiring parking are estimated at 1 for the café and remainder for the hotel.
- Day hours are 8am to 6pm.
- Summer (May to September), Winter (October to April).
- If the CPZ introduced, we assume on third of the 120 cars currently parking on surrounding streets would switch to using the station car park.

Forecast Demand for Car Park Spaces in Alexpo Scheme								
	Summer				Winter			
	Mon-Fri		Sat-Sun		Mon-Fri		Sat-Sun	
	day	night	day	night	day	night	day	night
Hotel	40	50	50	50	30	50	30	30
Café	8	2	8	2	6	2	8	2
Residential	40	60	50	60	40	60	50	60
Residential Visitors	6	4	10	4	6	4	10	4
Mini supermarket	6	4	6	5	6	4	6	5
Staff	5	3	5	3	5	3	5	3
Car Club	3	3	3	3	3	3	3	3
Public	120	4	180	4	40	4	60	4
Total	228	130	312	131	136	130	172	111
Number of Free Parking Spaces	-21	77	-105	76	71	77	35	96
Free excluding disabled spaces	-39	59	-123	58	53	59	17	78
Free spaces if CPZ implemented	-79	19	-163	18	13	19	-23	38

8.0 Conclusions

Using wholly inadequate and poorly implemented parking surveys and with very dubious reference to relevant parking policies Alexpo's advisors have tried to convince the council and interested parties that the Hampton Court Station site is a suitable candidate for a car park which is manifestly too small for the proposed development.

If this planning application was located in a town such as Kingston or Surbiton, with better train and bus services, and away from a busy tourist site then we doubt that there would be any objection to a car park with 207 spaces. We question how the architects and advisors who were also responsible for the previous scheme reached such a fundamentally different level of car park provision in 2008/2009 for a scheme with a smaller hotel and fewer residential units. Throughout the application documents Alexpo ignore the very obvious fact that one of the countries outstanding tourist attractions has a requirement for significant levels of seasonal car parking.

Our very conservative assessment indicates that if implemented the scheme would lead to an under-provision of 123 car park spaces and 163 spaces if a controlled parking (CPZ) is introduced. Given that the surrounding site already suffers from significant levels of congestion and pollution we cannot support a scheme with this level of car parking under provision which would lead to increased parking stress on local roads and large numbers of drivers searching for car park spaces they are unlikely to find.