

Hampton Court Rescue Campaign Response to Surrey County Council Consultation

We note SCC Highways recent consultation and have a number of observations with respect to their assessment of the parking provision for this application.

The SCC consultation is correct when it states that the level of parking provision is a matter for Elmbridge Council, notwithstanding this, we had hoped that the SCC consultation response would have addressed this issue with more professionalism than was evident in their very cursory, and often inaccurate response. This is a very complex site with significant transport, pollution and congestion challenges to overcome. We note that the author of this report graduated three years ago, and held a junior position within Surrey's transport team, where they had fourteen months experience before being assigned to this project, this is deeply troubling.

We have a number of points.

Despite having received HCRC's assessment of Alexpo's parking studies the author quotes verbatim from the applicant's transport submission.

*"Commuter parking accounts for approximately 93 spaces which peaks at 1.00 p.m".
At weekends higher levels of parking occur only when Hampton Court Palace has an event".*

We hoped that the author would follow correspondence from the applicant, specifically the JLL letter dated 1 March 2019 which states:

"Parking Surveys during school holidays and summer months – we have engaged with Network Rail, but such detailed surveys are not available".

If this statement from the applicant doesn't trouble SCC it should. We also note that the author goes on to make a detailed analysis of the parking provision with reference to one Google Earth image from one day. This also troubles us.

Surrey's highways officer goes on to state triumphantly:

"The Station does not have a statutory duty to provide parking for anyone, but does provide parking for commuters in the area using the station".

We remind Surrey's officer that our government passes many fine statutes but are seldom troubled by a requirement to pass laws regulating who can and cannot use a particular car park. Had the author undertaken a site survey they might have deduced that the car park provides parking for a range of users.

With increasing confidence the author goes on to make reference to Thames Ditton which he suggests does not have a car park used by commuters. This statement is contradicted by a large Council car park well used by commuters.

Now in full stride the author makes reference to the parking provision identified by Hampton Court Palace and notes:

“The Palace website clearly points visitors to the palace forecourt parking..... There is no mention of parking being available at Hampton Court Station for the use of Palace visitors”.

We refer the author to the Historic Royal Palaces website extract below which has been unchanged for some time. To help the author we have identified in red the specific text which they missed.

Parking

Limited parking is available. During our busy periods it is advisable to consider other means of travel.

On-site

£1.60 per hour (car parking bays fit a standard car only). Pay for your parking with cash, card or by using the [Gilde app](#).

Accessible parking

There are 9 disabled parking bays available on site.

Parking on site is free for Blue Badge holders.

Nearby

Hampton Court Green (500 metres from entrance) - £1.50 per hour

Hampton Court Train Station (200 metres from entrance) - For information about prices, please visit the [National Rail website](#).

The author may not be aware that there is a long history of Hampton Court Palace visitors using this car park. A site visit would have been illuminating. We note the sign below which we think implies parking for Hampton Court Palace visitors.



We also note that Surrey's guidance on parking is almost a mirror image of Elmbridge Council's policy and there is nothing in their guidance to suggest zero parking for apartment owners on this site. Our view is that the author has gone on a fishing trip to justify the parking provision in this scheme and selectively quoted relevant information to support this argument and ignored any evidence or policy which conflicted with this thesis.

The author goes on to note that:

“The amenity of residents in local roads may be affected due to increased commuter parking, but the implementation of a more wide reaching CPZ area would stop day long parking”.

While CPZ's are inevitable they will not solve the problem of a gross under-provision of parking in a very large scheme.

With reference to provision of parking for the hotel the author states:

“The hotel is more problematic in that the database does not give many examples in the South East that replicate the situation at the Jolly Boatman site and therefore the trip generation from the hotel is very robust”.

Surely this is a contradictory statement? If there is genuinely limited data then how is the data robust? We are well aware of a number of hotels on similar sites. HCRC's parking report pointed to the selective and spurious hotel data in the application documents which pointed to two hotels with seemingly small car parks in Hounslow but ignored their proximity to a 650 space car park within a two minute walk. The author makes reference to 7.5 two way trips to the hotel in the PM peak. Here we are in fantasy land for an 84 bedroom suburban hotel. An experienced officer should have challenged this data.

While it is not uncommon for the opponents of applications to disagree with consultation advice provided by statutory consultees we are deeply troubled by the lack of professionalism, biased commentary and complete lack of basic homework and failure to reference Surrey's widely quoted policy guidelines.

Given that LinkedIn is in the public domain it is not unreasonable to make reference to it. We suggest that the report is a reflection of the author's own personal beliefs and aspirations rather than an unbiased and considered analysis which we might reasonably have expected.

The author's LinkedIn profile points to volunteer work for Sustrans:

“For example I assisted with the filming of a debate on whether cars should be priced off London Roads...”

This author's volunteer work is commendable but it is impossible to escape the very obvious conclusion that the report should have been written by an officer with considerably more experience and without the bias and prejudice evident throughout the document.

We do note that the scheme suffers from catastrophically poor viability which has led to a development which is far too big for the site and appalling levels of affordability. We share with other commentators a view that the applicant has been held to ransom by Surrey Highways who have extracted £2,600,000 for highways works largely outside the site. We also note by their own admission that Surrey claim that the scheme will generate very limited levels of traffic.

We suggest that this “ransom” would not have been possible had Alexpo not had to rely on the Surrey’s land to the north of the site to gain access to the car park and that it is inconceivable that this did not colour Surrey’s thinking consciously or not. We leave others to make the connection between a £2,600,000 ransom and an overly favourable consultation full of bias and prejudice.



From our on-going dialogue with Alexpo we are aware that SCC gave Alexpo an early positive steer with respect to the broad highways design and car park size, without which no sensible developer would embark on a scheme with a car park with 207 spaces versus 287 in the approved scheme and hotel almost the twice size (64 rooms versus 46) and significantly more apartments (97 versus 46).

It is therefore very hard to escape the conclusion that Surrey’s early mandate was influential and made a significant contribution to the design of a scheme which serves no one and will cause congestion, inadequate parking, increased pollution and deep resentment. To place the financials in perspective Alexpo and Network Rail will share a £1.1 m profit from their £56m scheme, or £500k each which means that Surrey will enjoy five times the contribution without having to take any risk. Councillors who are looking for a higher contribution to affordable housing should point their fingers directly at SCC.

To those who question this thesis we suggest they ask themselves the question whether any experienced developer would fully work up a scheme at a cost likely to exceed £1m which was fundamentally different to the approved scheme and which conflicted with every known policy on parking provision unless you held in your back pocket a very positive heads up from the key consultee likely to influence the provision of parking?

We ask Elmbridge Council to set aside in its entirety the consultation advice by Surrey Council.