

Infrastructure & Environment

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Sent VIA EMAIL

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Market Street
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Dear Matthew

Planning Application 23/02094/FULMAJ – Eagle Quarter II, Newbury Highways Response by Waterman Infrastructure & Environment

This letter seeks to provide the Local Planning & Highway Authority at West Berkshire Council with further justification regarding the parking provision proposed for the redevelopment of the Kennet Centre site in Newbury (known as Eagle Quarter II).

Background

The Site, as detailed in Policy P1 of West Berkshire Council's Housing Site Allocations DPD 2006-2026, is located within Zone 1 of the area hierarchy. The parking requirement for residential development sites is based on the number of habitable bedrooms. The development proposals include 427 Build-to-Rent (B2R) apartments, the accommodation schedule is detailed below:

- 228 x 1 bed or studio apartments;
- 186 x 2 bed apartments; and
- 13 x 3 bed apartments.

Policy P1 states the minimum parking standards, applicable for residential developments within Zone 1 (Newbury town centre), are:

- 0.75 parking spaces per 1 bedroom apartment;
- 1 parking space per 2-bedroom apartment;
- 2 parking spaces per 3-bedroom apartment; and
- 1 visitor parking space is required per 5 apartments.

Based upon the parking standards the scheme requires 383 spaces for residents, plus a further 85 visitor parking spaces. Total parking provision required for the scheme therefore is 468 spaces.

The scheme features 475 parking spaces, which includes 392 spaces within the Kennet Centre multi-storey car park (MSCP), with a further 83 spaces provided in a new undercroft car park which would be accessed from Bartholomew Street.

The Kennet Centre MSCP will also be used by non-residents wishing to access Newbury town centre i.e. for retail, leisure related trips. It is currently used for the shopping centre however this is to be removed as part of the scheme, and there will be a resulting associated reduction in parking demand once the shopping centre is removed. However, based upon the minimum parking requirements, against the policy requirements, there would only be 7 parking spaces available in the MSCP for non-residents should parking provision accord entirely with Policy P1 with all residents/visitors parked at the same time.

We understand the Highway Authority are concerned there would be no times during the day when there would be sufficient space within the car park to cater for all users (residents and non-residents). As a result, the Highway Authority consider the level of parking provision to be unacceptable, as outlined in their responses dated 1st November 2023 and 19th January 2024. Waterman disagree and the information set out in this letter, and the accompanying report by CoMoUK Ltd, seeks to provide the Local Planning & Highway Authority with additional/ new justification as to why the proposed level of parking provision is considered appropriate and why a reduction in provision from the parking standards normally applied in West Berkshire is acceptable, on this occasion, given the proposed end development use and sustainable location.

Parking at Build to Rent (B2R) Schemes

When considering the suitability of a site, access to both good public transport facilities and local amenities are the principal drivers for a successful B2R development. This not only relates to having public transport facilities nearby (such as a railway station in short walking distance) but also ensuring that the routes and timings of public transport facilities are efficient and meet customer expectations, as well as convenient walking and cycle routes to local destinations.

Future residents of B2R schemes are self-determined choosing to rent within the scheme and are therefore only likely to move to the scheme if it meets their lifestyle and needs. Provision of parking spaces for example could be a determining factor as to whether or not they wish to reside in the development. People who choose to live in a B2R schemes know what they are getting upon renting an apartment. i.e. no parking provision or free/paid parking. Therefore, should a prospective tenant require an allocated/unallocated parking space and wish for this to be free of charge, they may opt to rent somewhere else, where parking is included and readily available. Furthermore, the rental model of B2R developments (with short term contracts) means residents can more easily move elsewhere if the property no longer suits their needs, including if they need a car parking space for example.

B2R schemes also typically attract younger people and therefore the demand for car parking at the proposed development will be significantly below that anticipated for more conventional residential developments elsewhere in Newbury or West Berkshire.

Within B2R developments of this scale it is also highly unlikely that all apartments would be occupied at any one time given the regular turnover of tenants, therefore a number of units would be temporarily vacant further reducing the parking demand. This number is typically around 3% for B2R schemes (equivalent to 13 parking spaces).

Further to the above, research completed by REalyse (<https://www.realyse.com/how-important-is-car-parking-to-build-to-rent-residents>) analysing B2R schemes concluded for schemes in core central locations (which is considered to be applicable to the Eagle Quarter II scheme) approximately 14% of residents requested parking. The research further supports the level of parking provision proposed for the scheme, where demand is anticipated to be significantly below the level of potential demand for parking if derived from Census data for existing dwellings within Newbury, which the West Berkshire parking standards are based.

A further guide to the appropriateness of reduced parking provision is supported by 2018 data from the Office for National Statistics (most recently available data). Data from the ONS demonstrates only 45% of households in furnished private rental properties own a car. This supporting information further supports the level of parking proposed, which is significantly lower than the parking minimum provision determined based on the requirements set out in Policy P1.

The following case study examples, included in **Table 1**, further reiterate how the demand for parking is evidently low for B2R schemes and this is proven given the abundance of low parking provision examples from across the UK.

Table 1: Build to Rent Car Parking Examples

Site / Development & Planning Application No.	No. Units	No. Parking spaces	Parking Ratio
Former Cooper Garage, Reading BMW, Kings Meadow Road (162166)	315	49	0.16
Land at Newhall Square, Birmingham (2017/02040/PA)	220	61	0.28
Former Octagon, Slough (P/04888/019)	343	60	0.17
Enid Wood House, Bracknell (67 units-13/00806/CLPUD, 30 units - 13/00362/FUL)	97	20	0.21
212-223 Broad Street Birmingham (2017/08357/PA)	481	48	0.1
Cornbrook Works, Trafford (90991/FUL/17)	363	101	0.28
10-12 Whitworth Street West, Manchester (108705/FO/2015/C1)	327	131 off site	0.4
The Lexington, Liverpool (16F/1370)	304	40	0.13
Land at 37-55 Perrymount Road and 1-5 Clair Road, Haywards Heath (DM/17/3413)	145	88	0.61
Edward St Quarter, Brighton (BH2018/02598)	208	10	0.05
81 Commercial Way, Woking (PLAN/2019/0611)	310	26	0.08
Circus Street, Brighton (BH2015/04299)	142	19	0.13
Trafford House, addition of 151 apartments and reduction of parking (20/00650/FULL)	535	100	0.18
Sackville Road, Hove (BH2019/03548)	564	150	0.27
Aubery Place, Milton Keynes (18/02822/OUT)	294	83	0.28
Average	4,648	986	0.21

The sites evidenced above show B2R developments in sustainable town centre locations across the UK with considerably reduced parking provision that have regularly been resolved and granted planning permission. All of these examples have significantly lower parking provision than is proposed for the Eagle Quarter II scheme, Newbury.

We acknowledge these sites are not located within Newbury or West Berkshire; however, they do indicate that a significantly lower parking provision is commonly provided and accepted for B2R schemes, many of which are not located as close as the Kennet Centre is to a mainline rail station (150m from Newbury Rail Station) or public transport provision (200m from Newbury Bus Station). The Kennet Centre is considered exceptional in this regard.

The average parking provision for the above case study schemes equates to 0.21 spaces per apartment (986 parking spaces / 4,648 apartments). Applying this level of parking provision to the proposed scheme would result in only 90 parking spaces being provided, as opposed to the 468 spaces sought in accordance with Policy P1. We consider this level of parking provision appropriate for the proposed end development use and sustainable location.

Table 2 below details the parking demand results from the Thursday to Saturday parking surveys, submitted from November 2022, and the spaces that would be available to residents. The peak parking demand is highlighted for each day. This Table assumes non-residents parking demand would continue at current levels. This is considered to be a worst-case scenario as demand is highly likely to decrease following demolition of the existing shopping centre.

Table 2: 2022 Parking Survey Results & Available Parking for Residents

Time	Thursday survey	Available for residential	Friday survey	Available for residential	Saturday survey	Available for residential
07:00	11	464	16	459	34	441
07:30	15	460	20	455	51	424
08:00	23	452	21	454	67	408
08:30	31	444	34	441	76	399
09:00	50	425	58	417	97	378
09:30	82	393	89	386	157	318
10:00	111	364	106	369	190	285
10:30	147	328	131	344	243	232
11:00	177	298	182	293	277	198
11:30	189	286	179	296	283	192
12:00	194	281	186	289	280	195
12:30	191	284	188	287	286	189
13:00	201	274	195	280	301	174
13:30	194	281	203	272	306	169
14:00	193	282	204	271	303	172
14:30	188	287	201	274	284	191
15:00	176	299	188	287	266	209
15:30	159	316	173	302	239	236
16:00	143	332	166	309	204	271
16:30	119	356	142	333	201	274
17:00	111	364	120	355	199	276
17:30	115	360	123	352	174	301
18:00	98	377	113	362	168	307
18:30	74	401	90	385	153	322
19:00	71	404	84	391	123	352
19:30	76	399	81	394	117	358
20:00	75	400	83	392	103	372
20:30	71	404	86	389	102	373
21:00	64	411	77	398	111	364
21:30	59	416	76	399	104	371
22:00	59	416	71	404	99	376

The parking accumulation survey results detailed in the table above demonstrate there would be sufficient provision in the MSCP to cater for both residents and non-residents, if parking provision in line with other B2R developments consented across the UK was provided (approx. 90 parking spaces). The key conclusions / position that can be taken from the results of the parking surveys, with regards to peak demand, indicate:

1. 201 spaces are occupied at 1pm on Thursday. This would result in 274 available spaces for residents (parking provision of 0.58 spaces per apartment);
2. 204 spaces are occupied at 2pm on Friday. This would result in 271 available spaces for residents (parking provision of 0.57 spaces per apartment); and
3. 306 spaces are occupied at 1:30pm on the Saturday. This would result in 169 available spaces for residents (parking provision of 0.36 spaces per apartment).

With parking spaces unallocated and available on a first-come basis it is not envisaged that there would be any issue with regards availability of parking spaces during the week. The provision of dual use parking, with commercial mainly by day and residents mainly overnight, ensures the level of parking provision is appropriate.

Newbury Town Centre Car Parks

Newbury not only benefits from a good range of car parking but has an oversupply of both short and long stay, across the town. The main car parks in Newbury (Parkway, Northbrook and Rail Station) are clearly signed and indicate availability, so visitors can make a choice of where to park whilst entering from the main roads on the outskirts of the town. These are all within a short walk of the site. For example:

- Newbury Rail Station Car Park located 150m to the south of the site;
- Northbrook Car Park located 250m to the north of the site; and
- Parkway Shopping Car Park located 500m to the north of the site.

As detailed in the Transport Assessment report there is significant spare capacity within the car parks in Newbury town centre. The 3 car parks (Parkway, Northbrook and Rail Station) provide a total of 1,458 spaces and at the busiest period the car parks are only 52.3% occupied, which results in an abundance of available spaces (893). The weekend peak occupancy is lower at 49%, providing 951 empty spaces.

In the unlikely events that the Kennet Centre MSCP should be full any overspill parking would easily be accommodated within the existing town centre provision.

Car Free Living in West Berkshire

As stated earlier, Census data supports the position with regards to low car ownership levels in Newbury town centre. Census data indicates local car ownership levels of 0.63 cars/vans per household in 2011. For existing residential developments within Newbury (flats, apartments etc), the Census data illustrates that 624 households (37% of the total) did not own a car. This figure is a significant number of households that do not own a car and the provision of 0.63 parking space per apartment is substantially lower than the parking requirements set out in Policy P1 (approximately 1.11 space per apartment based on the scheme mix).

The Census data thus demonstrates car-free living is an option for a significant proportion of existing residents within Newbury and across the district as a whole. This sets a clear precedent that a significant proportion of residents can and do live without owning a private vehicle and can access key services and facilities via other modes of transport. This further supports the recommendation for reduced parking provision at the development.

Policy P1 does take into consideration recorded census statistics (evidenced based), and therefore significantly over provides in terms of provision of parking spaces in this instance (given in particular the end use as a B2R scheme, being in a sustainable location and considering recorded statistics of the local area).

Sustainable Location

Given the number and range of local amenities in an acceptable walking/cycling distance of the scheme (as detailed within the Transport Assessment report), and the location of the development in terms of accessibility to public transport (located adjacent to bus stops, within 200m of Newbury Bus Station and 150m from Newbury Rail Station), a low car ownership scheme would be appropriate. Local amenities include Newbury Station, various town centre bus stops, Parkway Shopping, supermarkets (including Sainsburys, Aldi, Co-op, Lidl and Tesco), schools, leisure facilities, health services and employment areas. Such locational characteristics would assist in meeting the sustainable planning objectives of promoting opportunities for the use of alternative travel modes to the private car and reducing reliance upon owning a car.

Benefit of Low Parking Provision

The proposed development is situated in a highly accessible location with excellent public transport links, active travel routes, local amenities and facilities. The provision of reduced parking would result in fewer car-owning households occupying apartments on the site, thereby resulting in lower car use in Newbury town centre and deriving the maximum benefit afforded by the development's location.

The alternative being that such households would be accommodated in less sustainable locations where car ownership may be more important.

Paragraph 105 of the NPPF states that: "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." In line with the NPPF, a lower-car dependent development on this site is considered appropriate and would bring forward much needed residential development whilst minimising any increase in congestion and other environmental disbenefits associated with car traffic generation, including increased carbon emissions.

West Berkshire Council have published an Environment Strategy, which aims to make West Berkshire carbon neutral or net-zero for carbon emissions by 2030 and to ensure that concentrations of air pollutants are at safe levels. Reduced car parking provision would therefore align with the aims of meeting this strategy.

Low Parking Provision and Car Ownership

As stated earlier, the proposed level of parking provision is in line with anticipated levels of demand, given the type of use tenure proposed (B2R), which appeals to younger occupants who, based on research discussed earlier, are less likely to own a car. This logical conclusion is supported by a substantial body of information which shows the availability of parking within a scheme, and in locations where off-site car parking is limited, can be a key driver to reducing car ownership. The Transport for London (TfL) document "Residential Car Parking" (2017), states that "Developments with more car parking have residents who are more likely to own cars; this is consistent across a number of other factors". The document further found that "reducing the maximum provision of parking could encourage those who could consider a car-free lifestyle to adopt one". Whilst this document has been prepared by TfL and forms part of the evidence base for the London Plan, the conclusions are considered directly relevant to this application/development given its locational characteristics and excellent sustainable transport links (which would be similar to some areas of greater London).

It is therefore considered that the proposed B2R scheme is ideally placed to achieve this and given the location of the site, accessibility to excellent public transport and active travel routes further supports the lower parking provision.

Alternatives to Private Car Ownership

The scheme proposals include considerable sustainable elements that most other town centre residential developments do not facilitate. On-site amenities accessible by residents include lounges, workspaces and meeting rooms, leisure and gym facilities, extensive cycle parking, 3 car club spaces, roof terraces, and other ancillary facilities. While town centre facilities are accessible generally, they cannot be compared to having facilities directly in a development and available only to residents. Residents will therefore not be reliant on private car to access these facilities, which in turn facilitates the reduced car ownership and parking provision levels.

With reference to car clubs these have been shown to have significant benefits which is discussed below.

Car Club

Collaborative Mobility UK (CoMoUK) are a national charity dedicated to the social, economic and environmental benefits of shared transport. CoMoUK work collaboratively with public, private and third sector organisations, conduct unique research and advise public authorities on shared transport and sustainable transport more broadly.

CoMoUK have prepared a report on behalf of the applicant, Lochailort Newbury Ltd, which reviews the proposed shared transport facilities that are included as part of the development proposals i.e. car clubs. A copy of the report is appended to this letter.

The CoMoUK report states that car clubs have experienced substantial growth since the pandemic, with around 780,000 members of car club schemes across the UK, more than double the 2019 figure. Like car clubs, bike sharing schemes have also increased considerably since the pandemic. The number of users and fleet size in the UK has more than doubled, to c.4 million members and 46,000 bikes.

Car Clubs are a highly effective method in reducing car ownership and directly work towards air pollution reduction targets. 14% of the UK's car club fleet is electric, compared to just 2% of the country's overall fleet, and 100% of the UK's car clubs fleet meet standards for low emissions zones.

The CoMoUK England and Wales Car Club Annual Survey 2022 demonstrates that in England and Wales, between 9 and 22 private cars are taken off the road as a result of each Car Club vehicle. With 3 club spaces proposed within the MSCP, this could remove some 27-66 cars. This represents a further and significant decrease in parking demand. Note: Vehicles parked in the Car Club spaces would also be available for use by any member of the Club, whether resident at the scheme or not. This would increase its accessibility to local residents, therefore enabling a wider reduction in car ownership and benefits of use.

The attached CoMoUK report indicates that the site has "good potential for shared transport" with a range of factors influencing this such as:

- High population density;
- Low car ownership and commuting levels;
- Close proximity to public transport services (bus and rail);
- Close proximity to local amenities including health, education, employment, retail and leisure;
- On street parking restrictions; and
- Existing shared transport provision.

As outlined in CoMoUK report, the conditions are already favourable in the area for shared transport and the development would improve the situation. The development is likely to attract and be marketed at young professionals (as discussed above), the demographic most likely to use car clubs. As the development is well-served by nearby amenities and public transport, there is even less need to own a car in this location. This accords with the phrase “I don’t need a car very often” being the most-selected reason for joining a car club in CoMoUK’s latest annual survey.

CoMoUK strongly support the proposal to provide fewer parking spaces than that outlined in Policy P1. This is considered a crucial factor for the success of shared transport, car clubs in particular. A high number of private parking spaces induces people to purchase, and therefore use, private cars, which undermines the viability of car clubs and other sustainable transport modes in the area.

As already mentioned in this letter, being a rental-only development, residents are unlikely to have the same car ownership needs as owner-occupiers. This is one of the key reasons why we consider a reduction in provision from the parking standards normally applied in West Berkshire to be acceptable. This characteristic (low car ownership) has been picked up by CoMoUK who go on to state that the 2021 census indicates that in England, nearly 60% of private rented households do not own a car, vs less than 15% for owner-occupiers.

Three car club vehicles equates to between 27-66 private car spaces not needed at the development. As this is an average figure, the potential number of users per vehicle can be higher, as the vast majority of car club members only use vehicles 1-10 times per year. By working with the existing operator, the other four car club vehicles that are currently within 10 minutes’ walk of the site will also be available to residents, catering to any additional demand for car access.

Providing a car club van and bike sharing should also reduce the need for cars among residents. This is something the applicant would be prepared to commit to and is a recommendation outlined within the appended CoMoUK report. Any shared bike provision at the development would be a standalone scheme, rather than part of a wider network. Recommendations and provisions within the CoMoUK report include:

- Three new car club vehicles and any associated infrastructure work including EV charging;
- Analysis of existing car club vehicle usage. This could include moving existing vehicles to a more prominent position;
- Signing up new members to a car club;
- Providing incentives levels to new residents to use the car club, such as free memberships and driving credits;
- Provide a managed pool of bikes available for hire at a low cost, with some free rental credit. Use of the bikes would be monitored and if demand was high additional bikes would be purchased.

Other surveys from CoMoUK indicate that some 25% of Car Club members had sold a car since joining a Car Club, and 22% would have bought a car if they had not joined the Car Club. Accessibility to a Car Club vehicle therefore provides easy access to a car for occasional journeys, that cannot easily be made by other means and increases the number of people who can feasibly enjoy a largely carfree lifestyle.

As a result, Car Club members are considerably more likely to travel by sustainable modes. The CoMoUK Survey found that across England only 11% of people travel by bicycle more than once a week, whilst 30% of Car Club members use a bicycle at least three times a week. While generally only 8% travel by train at least once a week, 22% of Car Club members do so.

Shared transport is a popular and growing sector that supports transport decarbonisation goals, with car clubs replacing the need for between 9-22 private cars and bike sharing substituting around 245

million car miles annually. The three car club vehicles the applicant is planning to fund remove the need for between 27-66 private car spaces at the development, likely the higher end of this estimate, given that renters are less likely to own cars in the first place.

Car Park Management (for Consideration)

We understand the Highway Authority continues to support the provision of dual use car parking with commercial mainly by day and residential mainly by overnight, but as we have previously been advised “the numbers must work”. Based on provision and demand associated with other B2R schemes and following a review of the parking surveys undertaken of the MSCP, we consider the reduced provision (90 spaces) would be sufficient for the above-mentioned reasons. We acknowledge that the Highway Authority consider this differently and have therefore been investigating potential solutions to manage use of the car park, with a focus on the critical evening/overnight period.

As stated in Policy P1, based on the minimum parking standards set out the residential element of this scheme would require 468 car parking spaces to be provided, with 475 to be provided overall as part of the scheme. We understand that it is during the evening peak hour that the Highway Authority is concerned (after 6pm), when there are between 98 and 59 non-residential cars in the car park on a Thursday and between 71 and 113 non-residential cars in the car park on a Friday.

The existing variable message signs displayed around Newbury advise drivers on the current availability of parking spaces within Newbury. It is proposed that the management system and variable signs would be updated to display a lower parking capacity from late afternoon. For example, the variable message signs will show as full when there are 200 spaces available. This would leave 283 parking spaces available for residents (including the parking provision within the new undercroft car park – 83 spaces). This would ensure space capacity and would allow for fluctuations in residents leaving and returning from work. This would also provide sufficient advance notice to drivers (i.e. non-residents) to park elsewhere within the town.

In addition to amending the variable message signs, the entry barriers would be programmed to restrict access into the car park for the general public when a certain number of vehicles are parked and after an agreed time. This would not be when the car park is at full capacity, but when the car park reaches a critical level, for example when there are only 200 spaces available (exact number to be discussed and agreed with the Highway Authority). Entry would only be made available to residents, who would have a pass/card to enable access. The pass would enable the entry barrier to raise but not the exit barrier. This would ensure a resident still pays for parking (which would be the same rate as the general public). This strategy would safeguard a specific number of car park spaces for residents.

It is proposed, for a period of 3-years post completion, and every 6 months car park management and capacity is reviewed, with the strategy and provision refined over this period to take account of actual car ownership levels associated with the B2R scheme. The MSCP Management Review could be conditioned and included as part of the Car Park Management Plan, or Travel Plan and secured through the S106.

Summary of Key Points

In summary, reduced car parking provision is considered to be appropriate for the following reasons:

1. Levels of parking demand are significantly lower for B2R scheme than for residential schemes marketed for private sale due to the nature of the occupants and their propensity to own cars. The information provided in this letter lists a number of B2R schemes consented across the UK, along with respective parking provision. These are mostly schemes of 300+ units with an average parking ratio of 0.21. B2R developments with reduced parking provision in sustainable town centre locations have regularly been granted planning permission.

2. The profile of B2R residents include people who are seeking flexibility and convenience. For the same reasons many people choose to rent a home and not buy, many people choose to not own a car and seek more flexible and convenient forms of transport such as public transport, cycling or using a Car Club. The suite of documents submitted to support the application includes a Travel Plan that sets out measures to support travel by other means than the car. For these reasons, and as recognised by Paragraph 105 of the NPPF, it is necessary for any local parking standards to consider both the use and location of a development.
3. The level of car parking proposed is in line with the expected level of demand for this particular build type. B2R schemes typically attract younger people, with car ownership for younger people below average and would demand less parking provision than conventional housing. Future residents of the scheme will also be self-determined, choosing to rent within the scheme and would therefore only likely move to the development if it meets their lifestyle and needs, of which accessibility and provision of parking could and would likely be a determining factor.
4. There is significant existing demand for car-free living within Newbury;
5. The site is located within one of the most sustainable and accessible locations within Newbury and indeed West Berkshire, and therefore is an appropriate location for a low-car development;
6. There is a clear link between the provision of parking and car-ownership levels, whereby the more parking made available to residents the more likely it is to lead to higher demand;
7. The scheme will provide a genuine alternative to private car ownership through the provision of Car Club vehicles and membership and other sustainable travel incentives such as pool bikes. Car clubs replace the need for between 9-22 private cars per car.
8. A car park management strategy would ensure space capacity and would allow for fluctuations in residents leaving and returning from work.

The above points are supported by a substantial body of information which shows that the availability of parking within a location, where off-site car parking is limited, is a key driver of determining the levels of car ownership and seek to minimise the reliance of the private car through onsite controls and accessibility to alternative modes (which in this case given the sites location are significant).

Conclusion

As acknowledged by the Council, the principle of dual use of the MSCP is agreed. We consider the above provides the Local Planning & Highway Authority with sufficient evidence to demonstrate compliance with Policy P1 and policy set out in the NPPF, and that the parking provision proposed is appropriate for the scale and type of development (Build to Rent scheme).

We would be grateful for the opportunity to discuss these matters further and agree on any suitable conditions to secure the management of the MSCP through the Travel Plan or Car Park Management Plan.

Yours sincerely



David Whalley

Associate Director – Transport Planning

For and On Behalf of **Waterman Infrastructure & Environment Ltd**

Encl. CoMoUK report