

Deborah Lynn

From: [REDACTED]
Sent: 28 June 2026 23:21
To: planninginfo
Subject: Comments on planning application DM/26/1325
Attachments: america-lane_looking-west.jpg; area-of-proposed-development.jpg; boston-road_east-side_looking-south.jpg; america-lane_looking-east.jpg; boston-road_south-side_looking-west.jpg; boston-road_west-side_looking-north.jpg; boston-road_west-side_looking-south.jpg; survey-route-annotated.jpg

[REDACTED]

To whom it may concern,

We understand that this planning application (DM/26/1325 for the demolition of existing garages and erection of 8 new dwellings on the land to the rear of 34 to 56 America Lane) has already been withdrawn by the applicants, however we would like to register our comments on this matter so that we can refer back to this communication in the event of any similar future application(s). If possible, please could you let us know whether or not our comments will be filed under the withdrawn application, or if the application has already been closed to further comments prior to the original deadline of 29/06/2026.

We would like to draw your attention to the fact that the transport report submitted alongside this proposal is somewhat outdated (dated September 2021 at the same time as the initial proposal submitted by Rayfords LLP). Of particular concern to us are the currency and validity of the figures reported in the parking beat survey which are referenced by WSCC Highways in their consultation response dated 16/06/2026 under the header of "Parking" where it is indicated that the parking stress as a result of this development is "within limits" and "not near to 85% capacity". These figures are not an accurate representation of observed parking stress in the local area for the following reasons:

- The 2021 parking beat survey over-reports the number of available parking spaces both as a result of the road layout changing since 2021 and incorrect reporting at the time of conducting the survey . The actual number of available spaces is about 63 compared to the original claim of 76 as a result of the following errors (please see the annotated attachment "survey-route-annotated.jpg"):
 - The length of all laybys have been over-reported as a result of taking the measurement of the road side of the layby. Due to the angled entry and exit of these laybys, the actual available parking length should be measured along the pavement side of the layby from and to a point where the width of the layby is at least that of a full car. The layby on America Lane immediately outside of Boston Court has also recently had an additional "island" installed for the bus stop there, reducing the number of available spaces further (this reduction is not included in our figures).
 - Areas which are now discounted by double yellow lines are measured in the original report potentially as a result of changes in road layout since 2021 and there are many dedicated disabled parking bays which are not taken into account in the original report, instead being counted as regular available spaces.
 - Many driveways without dropped kerbs are considered as available spaces potentially as a result of an increase in the number of front gardens which have been converted to driveways since 2021. Irrespective of whether or not there is a dropped kerb, the space

across a driveway is not a valid area to park a car as stipulated in the Highway Code and therefore should be discounted from the survey.

- Space opposite the junctions between Boston Road and the road of the proposed new development are considered as available spaces. Parking across a junction is not permitted as stipulated in the Highway Code and therefore these areas should be discounted from the survey as they will not be parkable after the development is completed.
- The 2021 parking beat survey under-reports the number of cars parked overnight in the surrounding area. We conducted our own survey following the same route as the 2021 survey at about 00:35 on 10/04/2026 and found that the actual number of cars parked overnight is 57 compared to the original claim of 35-36. Please see the images attached from the start of each "leg" of the beat route; full video footage of the beat is available on request. This discrepancy could be as a result of:
 - Changes in road use since 2021, for instance as a result of more shops being open for business in the parade on America Lane.
 - Under-reporting by the surveyors as a result of bias towards making a favourable finding for Rayfords LLP, for instance as a result of not counting cars which are parked along the route but which are illegally parked or not parked in an area which the survey considers to be parkable. Any car parked on public property in the area of the beat route, whether parked in a valid or invalid spot such as on double yellow lines, should be counted towards the total since, if there were sufficient valid spaces in the immediate area, these cars would be occupying those spaces instead. This error seems quite possible since the survey results have a conspicuous lack of cars counted in areas which they have marked as "not included in analysis to maintain free flow of traffic"; in reality there are normally cars parked on both sides of the road and although the space may not be counted towards the number for available parking spaces, any observed cars should definitely be counted towards the number for actual parking demand.

Taking these corrected numbers, we obtain a potential current parking stress of at least 90% compared to the survey claim of 45-47% (values above 100% are entirely possible as a result of cars parking overly close together and in areas which are not considered to be valid parking). This is not an exaggerated result (if anything it is optimistic) and, as residents who frequently return home after 21:00-22:00 (after most cars have been parked for the night) at least twice per week, we can say that our suggested parking stress figure is a good reflection of the current parking demand on Boston Road and in the general area; vehicles are generally parked well onto pavements in order to park on both side of the narrow road, across driveways, on grass verges, across junctions, along the road to the rear of America Lane where the proposed development would be and on double yellow lines. We are in the fortunate position to have sufficient off-street parking for our own needs, however other residents (particularly those in flats) are not in the same position and would suffer even more as a result of having more cars on the road.

Any permission for a housing development on this land should only be granted subject to an updated, accurate and unbiased 3rd party parking beat survey. The results of such a survey will, we are sure, demonstrate a requirement for any development to provide enough additional parking to at least meet the maximum expected increase in parking demand as a result of the size and number of proposed dwellings. This condition is not met in the case of the withdrawn application, and any future proposals should consider a reduced scope to reflect this.

We also have other reservations concerning both the impact on road safety and quality of life for the residents of Boston Road during the construction of the proposed development and the financial

viability of this development (the current applicants having displayed an inability to break ground in the last three years under the previous permission granted on appeal in 2023). In light of the fact that this application has already been withdrawn, we will not expand on these concerns at this time as they apply mostly to this specific application, and not to any potential future application(s).

All the best

