

Agenda Item 12
Report PC20/21-45

Report to	Planning Committee
Date	15 April 2021
By	Director of Planning
Title of Report	Adoption of the Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document (SPD)
Purpose of Report	To present the revised Guidance on Parking for Residential and Non-Residential Development SPD for adoption

The Committee is recommended to:

- 1) Note the content of the Consultation Statement (Appendix 1 of this report)**
- 2) Adopt the Guidance on Parking for Residential and Non-Residential Development SPD (Appendix 2 of this report) including Parking Calculator (Appendix 3 of this report).**

I. Summary

- I.1 The South Downs Local Plan (SDLP) adopted in July 2019 includes Development Management Policy SD22: Parking Provision. This Policy permits development that provides an appropriate level of cycle and vehicle parking in accordance with the relevant adopted parking standards for the locality. The Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document (SPD), referred to hereafter as the “Parking SPD”, provides parking standards for the South Downs National Park (SDNP). The Parking SPD aims to assist the implementation of the Local Plan as one of a number of SPDs and technical advice notes.
- I.2 The purpose of the Parking SPD is to give clear direction to all those involved in the planning decision making process regarding the provision of cycle and vehicle parking for new residential and non-residential development in the SDNP. On adoption, the Parking SPD along with some locally specific Neighbourhood Development Plan policies replaces all previous standards provided by the local Highways authorities in the SDNP.
- I.3 Public consultation took place in September to November 2020 on the draft SPD. The Consultation Statement, forming **Appendix 1** of this report, summarises and responds to the representations received. Changes made to the draft SPD in response to the representations, are set out in the Consultation Statement. The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) legally require local planning authorities, prior to adopting a SPD, to publish the Consultation Statement and revised SPD for comment for a minimum four week period. This second consultation took place from 4 February to 18 March 2021, a six-week period. **Appendix 1** also summarises and responds to further representations received during this second consultation. A revised Parking SPD and its parking calculator form **Appendix 2 and 3 respectively** of this report. Appendix 4 contains the Determination Statement for the Strategic Environmental Assessment and the Habitats Regulations Assessment.

2. Background

- 2.1 The Parking SPD responds to the landscape led approach of the SDLP, to provide detail on the implementation of policy SD22: Parking Provision. The Parking SPD has two overarching principles: landscape led and sustainable location.
- 2.2 For residential development, the two principles will be applied in conjunction with the parking calculator to determine parking provision.
- 2.3 The parking calculator uses information on expected levels of car ownership to give an output for the number of spaces to meet predicted demand for a residential scheme. The output from the parking calculator is just a starting point and a guide and may be varied as the principles of landscape led and sustainable location are applied to a residential scheme.
- 2.4 For non-residential schemes, the two principles will be applied in conjunction with Table 2 on page 15/16 of the SPD (Appendix 1). The figures in Table 2 are initial guidance and developers will need to carry out site-specific parking assessment for a proposed scheme.
- 2.5 Decision makers are expected to include all other relevant information in the process of determining parking provision for residential and non-residential development. The two principles being applied to proposed schemes is to allow flexibility in decision making rather than rigidly applying parking numbers. This is to avoid harm to the landscape through visually intrusive parking provision in sensitive locations where the negative impact cannot be overcome through the design and arrangement of the proposed scheme. In addition, some locations may allow for a variation in parking provision due to the availability of alternative means of travel other than the private car.
- 2.6 Parking provision for people with disabilities is explicitly covered in the guidance reflecting the importance of making development accessible for all users.
- 2.7 Cycle parking guidance is provided with standards for both residential and non-residential development.

3. Consultation

- 3.1 In August 2020, Planning Committee approved for consultation the draft Parking SPD. Public consultation took place for eight weeks from 24 September to 19 November 2020. Forty four representations were received from a range of individuals and organisations including Parish/Town/District/County Councils, statutory bodies, civic groups and other public bodies. The representations are summarised in the Consultation Statement, which forms Appendix 1 of this report.
- 3.2 The key response themes are summarised as follows:
 - Parish/Town Councils
 - On street parking and new development adding to existing issues
 - Concerns about use of the output from the parking calculator, including link to existing on street issues
 - Support for general approach including the two principles and flexibility in decision making
 - District/County Council
 - Revisions to Table 2 in relation to Use classes Order changes in 2020
 - Civic groups
 - Detail and improvement needed on guidance for cycle parking provision
 - Greater focus needed on the shift from the private car to other forms of transport
- 3.3 Themes raised by respondents in general included adding detail on electric vehicle charging points and improvements to the guidance on cycle parking including quantity of provision. Other issues raised included providing clarity on disabled parking, minimum requirements for the size of spaces, clarity on parking surveys requirements and site assessment for non-residential development.

- 3.4 Following the public consultation, a revised Parking SPD was prepared. Changes made, where appropriate, as follows:
- Revised sections on Principles (paragraph 3.1 of SPD) and Parking Calculator (paragraph 5.1 of SPD) to be more explicit about how decision makers use the output from the parking calculator and all other relevant information in determining parking provision.
 - Added the principle that provision of all necessary vehicular parking should as far as practicable be on-site (paragraph 3.2 of SPD).
 - Some wording added to clarify the principles of Landscape led and Sustainable location, (paragraphs 3.8, 3.11 and 3.12 of SPD).
 - Expanded guidance on electric vehicle charging point provision with added detail in new section 4.
 - Section 6 Cycle parking and Table 2 in section 8 Non-residential development, added detail on cycle parking provision and references to standards including a wider variety of cycles.
 - Added clarity on provision in section 7 Disabled parking
 - Revised Table 2, section 8 Non-residential development to reflect changes to the Use Classes Order.
 - Added clarity to section 8 Non-residential development on use classes (paragraph 8.10) and site assessment (paragraph 8.3 and 8.4 of SPD)
 - New section 11 Parking Space Dimensions to clearly set out minimum dimensions for types of parking space
- 3.5 The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) legally require local planning authorities, prior to adopting a SPD, to publish the Consultation Statement and revised SPD for comment for a minimum four week period. The consultation was extended by two weeks in response to the new lockdown. This consultation took place from 04 February to 18 March 2021. A further 25 representations were received and these are detailed in the Consultation Statement, which forms **Appendix I** of this report.
- 3.6 Eleven of the representations either supported the SPD or thanked the SDNPA for the opportunity to comment without making any further response. The majority of the remaining representations either followed up on, or raised issues, covered by changes to the revised SPD. These representations raised no new substantive issues that required changes to the Parking SPD. One Parish Council, responding for the first time, stated they objected to what has been presented as the Parking Calculator as not fit for purpose. The objection was about the output from the Parking Calculator using example schemes from the parish. The revisions to the SPD had already amplified how decision makers are to use the output from the parking calculator and therefore dealt with the objection raised. No revisions were made to the Parking SPD following the second consultation.
- 4. Next steps**
- 4.1 The recommendation of this report is that Members note the content of the Consultation Statement and adopt the revised Parking SPD.
- 4.2 Once adopted, the Parking SPD will be a material consideration in the determination of planning applications. The Parking SPD will help to ensure there is suitable parking provision for vehicles and cycles, including electric vehicle charging points at new development in accordance with the landscape led approach of the SDLP.
- 4.3 The Parking SPD and other SPDs presented to Planning Committee in the coming months will be designed and formatted into a common style. The formatting and design of the Parking SPD will occur following adoption although the content will remain unchanged.
- 5. Sustainability Appraisal and Habitats Regulations Assessment screening**
- 5.1 The European Union Directive 2001/42/EC sets out legislation on the assessment of the effects of certain plans and programmes on the environment (known as 'Strategic Environmental Assessment' or 'SEA'). Where the Authority determines that SEA is not

required then under Regulation 9(3) the Authority must prepare a statement setting out the reasons for this determination. In addition, as required by Habitats Regulations Assessment (HRA), the SDNPA has assessed whether the policies and proposals set out in the Parking SPD will have any significant impacts on Natura 2000 sites, thereby necessitating an Appropriate Assessment to consider the impact on the integrity of any such sites.

- 5.2 Therefore, SDNA produced a Draft Determination Statement for SEA and HRA. The Draft Determination Statement concluded that i) SEA was not required as there were no likely significant effects and ii) Appropriate Assessment was considered unnecessary as there would be no significant impacts on Natura 2000 sites.
- 5.3 Consultation on the Draft Determination Statement took place from 24 September to 19 November 2020 with the three statutory bodies, Historic England, the Environment Agency and Natural England. The Environment Agency stated, “we do not believe that the SPD is likely to give rise to significant environmental effects and as such would not require an SEA in relation to the issues in our remit.” Historic England did not wish to comment as the SPD deals with matters largely beyond their remit. Similarly, Natural England made no comment as the Parking SPD “does not appear to relate to our interests to any significant extent.”
- 5.4 Following the response from the three statutory bodies, the determination concludes that the Parking SPD is unlikely to have any significant environmental effects and therefore SEA and Appropriate Assessment for HRA are not required. The Determination Statement for SEA and HRA is Appendix 4 of this report.

6. Other Implications

Implication	Yes*/No
Will further decisions be required by another committee/full authority?	No.
Does the proposal raise any Resource implications?	<p>A transport consultant produced the Parking Calculator at a cost of £5,500. The budget for the Parking SPD covered this cost. Rest of the production of the SPD used existing internal resources.</p> <p>The costs of formatting and design production of the SPD will be met within existing budgets.</p>
Has due regard been taken of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	<p>The Authority has a duty under Section 149 of the Equality Act 2010 ('the Act') to have due regard in the exercise of its functions to the need to:</p> <ul style="list-style-type: none"> • Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act; • Advance equality of opportunity between persons who share a relevant protected characteristic (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation) and those who do not share it; • Foster good relations between persons who share a relevant protected characteristic and persons who do not share it. • Due regard in this context involves having due regard in particular to: <ul style="list-style-type: none"> a) The need to remove or minimise disadvantages suffered by persons sharing a relevant characteristic connected to that characteristic; b) Take steps to meet the needs of persons

	<p>sharing a relevant protected characteristic different from the needs of persons who do not share it;</p> <p>c) Encourage persons sharing a relevant protected characteristic to participate in public life or in any other activity which participation by such persons is disproportionately low.</p> <p>The Parking SPD ensures there is suitable parking provision at new development for vehicles and cycles to serve all people whether residents, workers or visitors.</p>
Are there any Human Rights implications arising from the proposal?	None.
Are there any Crime & Disorder implications arising from the proposal?	None.
Are there any Health & Safety implications arising from the proposal?	None.
Are there any Sustainability implications based on the 5 principles set out in the SDNPA Sustainability Strategy:	<p>1. Living within environmental limits</p> <p>The Parking SPD guides the suitable provision of Electric Vehicle charging points and cycle parking at new development, which both assist the transition to more sustainable forms of transport.</p> <p>3. Achieving a sustainable economy</p> <p>The Parking SPD guides provision of all types of parking at new commercial development to help facilitate the movement of people and goods to achieve a sustainable economy.</p>

7. Risks Associated with the Proposed Decision

7.1 Risk assessment provided in the table below.

Risk	Likelihood	Impact	Mitigation
If adopted: Third party challenge to the principle of, or the guidance contained within, the SPD. A challenge can be made within a three month period following adoption.	Possible (3)	Moderate (3)	The SPD is prepared in compliance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

TIM SLANEY

Director of Planning

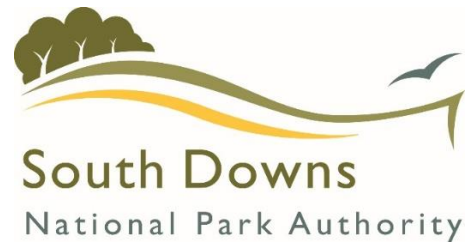
South Downs National Park Authority

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Appendices	<ol style="list-style-type: none"> 1. Consultation Statement 2. Revised Parking SPD 3. Revised Parking SPD – Appendix A Parking Calculator 4. Determination Statement SEA and HRA
SDNPA Consultees	Legal Services; Chief Finance Officer; Monitoring Officer; Director of Planning
External Consultees	None
Background Documents	<p>Draft Parking SPD for consultation, Item 11, Planning Committee 13 August 2020</p> <p>https://www.southdowns.gov.uk/meeting/planning-committee-13-august-2020/</p> <p>South Downs Local Plan 2014-33</p> <p>https://www.southdowns.gov.uk/wp-content/uploads/2019/07/SD_LocalPlan_2019_17Wb.pdf</p>



Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document

Consultation Statement

March 2021

I.1. Draft Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document (SPD) (hereafter referred to as the Parking SPD). The purpose of the Parking SPD is to provide clear direction to all those involved in the planning decision making process regarding the provision of parking for different types of transportation including cycles, electric bicycles/vehicles and motor vehicles at new development in the South Downs National Park (SDNP). Once adopted, the SPD will be a material consideration for relevant planning applications.

I.2. This Consultation Statement has been prepared in accordance with Regulation 12(a) and (b) of the Town and Country (Local Development) (England) Regulations 2004 which states:

“Before a local planning authority adopt a supplementary planning document it must—

(a) prepare a statement setting out—

(i) the persons the local planning authority consulted when preparing the supplementary planning document;

(ii) a summary of the main issues raised by those persons; and

(iii) how those issues have been addressed in the supplementary planning document; and

(b) for the purpose of seeking representations under regulation 13, make copies of that statement and the supplementary planning document available in accordance with regulation 35 together with details of—

(i) the date by which representations must be made (being not less than 4 weeks from the date the local planning authority complies with this paragraph), and

(ii) the address to which they must be sent.”

I.3. This statement sets out details of the consultation that has taken place to date which has informed and refined the SPD. It sets out details of how, when and with whom the initial consultations with interested parties and organisations took place and how this has informed the SPD.

I.4. Following the preparation of the draft SPD, the South Downs National Park Authority (SDNPA) resolved to undertake an eight-week consultation on the Parking SPD between 24 September 2020 and 19 November 2020. As part of the consultation, the SDNPA:

- Published the draft Parking SPD on the SDNPA website
- Sent emails and letters to persons and organisations on the SDNPA Local Plan mailing list inviting them to examine the consultation documents and make representation on them during the consultation period;
- Highlighted the consultation and answered questions on the draft SPD at the SDNPA Agents Forum on 30 September 2020 and invited agents to respond.

I.5. The SDNPA considered it appropriate to consult the following consultation bodies on the draft Parking SPD:

- Relevant district and county councils
 - Adur District Council
 - Arun District Council
 - Brighton & Hove City Council
 - Chichester District Council
 - East Hampshire District Council

- East Sussex County Council
- Eastleigh Borough Council
- Hampshire County Council
- Horsham District Council
- Lewes & Eastbourne District Councils
- Mid Sussex District Council
- Surrey County Council
- Waverley District Council
- Wealden District Council
- West Sussex County Council
- Winchester City Council
- Worthing Borough Council
- Parish Councils within the National Park

I.6. Consultation responses were received from 44 individuals and organisations. The comments received are summarised in **Appendix 1**. Officer comments relating to the responses received and how the SPD has been amended in response to these is set out in Appendix 1.

I.7. The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) legally require local planning authorities, prior to adopting a SPD, to publish the Consultation Statement and revised SPD for comment for a minimum four week period. This consultation took place from the 4 February to 18 March 2021. A further 25 representations were received during this period and these are summarised in **Appendix 2**. Officer comments relating to the responses received and how the SPD has been amended in response to these is set out in **Appendix 2**.

Appendix I

Draft Parking SPD: Summary of comments received September-November 2020 and officer comments

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
Nikki Faulkner, Planning Policy, Arun District Council (01)	<ul style="list-style-type: none"> Agree with requirements for cycle parking and non-residential development. Suggesting elaborate on paras 4.1/4.2, have summary table of parking provision by area (ward) to ensure data is transparent. E.g., more sustainable locations, data will reflect this with lower parking provision in the numbers. Unclear the aim of the parking calculator. Calculator requires person inputting to know how many unallocated/allocated spaces. Is that correct? Can "allocated" be defined? Suggest data inputted in columns C-G should give answers for all remaining columns (without need to input number of allocated spaces). Decimal points for calculator results - guidance as to whether to round up or down. Provide standards and detail for EV charging, Arun DC have prepared SPD with this included - https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n14832.pdf&ver=15210 	<ul style="list-style-type: none"> Welcome support on cycle parking and non-residential development. Propose following changes in response to comments raised: More explanation on how parking calculator works. <p>Clarify the input of "allocated" spaces and explain what this term means.</p> <p>Also, explain about rounding up/down the figures.</p> <p>Guidance to be included on EV charging points.</p>	<ul style="list-style-type: none"> Add further explanation on how the parking calculator works with added paragraphs 5.1 and 5.2. Add wording to explain allocated spaces in new paragraph 5.2. Rounding up/down of figures to be clarified, in new paragraph 5.4. Guidance on EV charging to be added in new section 4.
Bramber Parish Council (02)	<ul style="list-style-type: none"> Broad support for Parking SPD 	<ul style="list-style-type: none"> Welcome broad support for Parking SPD. 	<ul style="list-style-type: none"> New Cycling section to be added (new section 6); Cycle

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> Concern that parking calculator provides insufficient motor vehicle spaces leading to excessive use of highway for parking. Inadequate numbers of required cycle spaces (Table 1) Suggest adding bullet point to para 3.7 “All car and cycle parking should include secure battery re-charging points located to minimise the creation of trip hazards when in use.” SPD should specify minimum dimensions for cycle parking and access points using guidance similar to London Cycle Design Standards 	<ul style="list-style-type: none"> Note concern about motor vehicle spaces. However, parking calculator for residential is only part of decision-making process and the guidance requires suitable parking provision on-site to avoid adding to existing on street issues. Cycle spaces for residential and non-residential will be reviewed in light of recent Government guidance. Agree further detail required on EV charging. Minimum dimensions included for garages. Include for other types of cycle parking/storage. 	<p>parking standards to be reviewed and new figures to be provided in revised Tables 1 & 2 and new section 7 Disabled Parking.</p> <ul style="list-style-type: none"> Guidance on EV charging to be added in new section 4. Dimensions for cycle parking in new section 11 Parking Space Dimensions to cross reference Cycle Infrastructure Design, Local Transport Note LTN 1/20 July 2020.
Bramshott and Liphook Parish Council (03)	<ul style="list-style-type: none"> Document does not take into account commuter traffic and parking provision for commuters. Parking calculator output has criteria applied that are subjective and therefore an inefficient process. Consultation needs to realistically consider the economic future of settlements and availability of parking. 	<ul style="list-style-type: none"> The guidance covers parking provision at new non-residential developments where staff commute to that location by car. The Parking Calculator is to be used with the two principles to allow for flexibility in decision-making. Public car parking in settlements in general, whether for 	<ul style="list-style-type: none"> None.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		commuters or visitors, is a matter for the local highways authority and the district/borough council.	
Buriton Parish Council (04)	<ul style="list-style-type: none"> • General support for the SPD. • Support assumption that garages not often used for parking and therefore only count as third of parking space. • Larger garage size should be adopted for (residential development) cycle parking rather than separate structures. However, separate structures should be provided for non-residential development. • Concerned about weighting given to public transport provision by parking calculator, especially for villages like Buriton. Calculation needs to accurately reflect likely use of private car to avoid on street parking in existing streets. • Ensure adequate visitor parking. 	<ul style="list-style-type: none"> • Welcome support for general principles. • Cycle spaces for residential and non-residential will be reviewed in light of recent Government guidance. • Parking calculator only uses figures on car ownership. Landscape led principle takes into account public transport as one of the factors in deciding suitable parking provision at a site. • Avoiding on street parking is key part of the guidance and this can be made more explicit. • Visitor parking is part of the decision making process for residential (parking calculator provides output for visitor spaces) and non-residential (standards in Table 2). 	<ul style="list-style-type: none"> • New Cycling section to be added (new section 6); Cycle parking standards to be reviewed and new figures to be provided in revised Tables 1 & 2 and new section 7 Disabled Parking. • Principle of parking provision on site to avoid additional on street parking, made explicit through adding wording to new paragraph 3.2.
Cycle Lewes (05)	<ul style="list-style-type: none"> • Primary purpose of SPD needs to be to ensure provision is made for change from motor vehicles to other forms of transport. 	<ul style="list-style-type: none"> • Support the shift to forms of transport other than the private car. However, the SPD 	<ul style="list-style-type: none"> • Guidance on EV charging to be added in new section 4.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<p>This includes taking full account of e-bikes, electric scooters and need for EV charging points. Document should be renamed to reflect this shift.</p> <ul style="list-style-type: none"> Facilities for parking to reflect rule H1 of The Highway Code and the hierarchy of road users. Standard for pedestrian access, reflecting natural desire lines, including gradients, width of pathways. Suggesting amended Table 1 for cycle space provision for residential development as under providing as existing document. Proposing each occupier to have secure cycle space, with 50% of properties having secure enclosed cycle store with integrated charging point for e-bikes/scooters. Non-residential development need for secure cycle facilities Touring cyclists and green tourism demand, towns and villages to have well located secure facilities including lockable cycle storage units. 	<p>recognises in the short to medium term private cars will continue to make up a significant number of journeys in the rural areas of the National Park where public transport coverage is poor. Support is given in the SPD for the switch to electric vehicles. The current title of the document is suitable and clearly describes the purpose.</p> <ul style="list-style-type: none"> Agree further detail required on EV charging. Cycle spaces for residential and non-residential will be reviewed in light of recent Government guidance. Provision of cycle facilities per se in towns and villages for visitors or residents is a matter for the highways authority and the district/borough council. 	<ul style="list-style-type: none"> New Cycling section to be added (new section 6); Cycle parking standards to be reviewed and new figures to be provided in revised Tables 1 & 2 and new section 7 Disabled Parking. Dimensions for cycle parking in new section 11 Parking Space Dimensions cross reference Cycle Infrastructure Design, Local Transport Note LTN 1/20 July 2020.
Cycling UK Local Representative Brighton and Hove (06)	<ul style="list-style-type: none"> Contends that a cycle is a vehicle in English law and this should be reflected in the wording in the SPD. Currently SPD refers to cycles separately to other vehicles. 	<ul style="list-style-type: none"> Use of words cycle and vehicle in the SPD is sufficiently clear. Check whether different types of motor vehicles are adequately provided for in the non-residential section. 	<ul style="list-style-type: none"> Add wording to non-residential section to cover different types of commercial vehicle including LGC/HGV. Add wording to new paragraphs 8.3, 8.6, and 8.7 to ensure different types of

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> • Vehicles also includes different types e.g. vans, lorries and unsure this has been factored into the SPD. • SPD to give attention to different types of cycles in space provisions. • No reference to Local Cycling and Walking Infrastructure Plans (LCWIP). • Have more ambition in setting higher standards for cycle parking above current demand and restrain high demand for car parking. • Presumption in favour of less car parking rather than need for “robust” case in paras 3.10/11. • Query how the other costs e.g. production of toxic emissions, other than to sensitive landscape, have been accounted for the provision of car parking spaces. • Parking Calculator predicts and provides for cars rather reduce their use. • There is no equivalent calculator for cycles. • Counting of three garages as one space is too generous. • Improve clarity on cycle provision requirements including detail on inside/outside storage, visitor spaces. • No technical guidance on type or dimensions of cycle parking provision. 	<ul style="list-style-type: none"> • Cycle spaces for residential and non-residential will be reviewed in light of recent Government guidance. • Any opportunity for the development to assist in achieving LCWIP objectives would be assessed at application stage. • The SPD recognises in the short to medium term private cars will continue to make up a significant number of journeys in the rural areas of the National Park where public transport coverage is poor. The Parking Calculator reflects the need to provide parking for private cars. • Setting standards for cycle parking provision is currently considered a better method than a cycle parking calculator. Future iterations of the SPD could revisit the use of a cycle parking calculator. • Agree more detail needed on cycle parking type and dimensions. 	<p>vehicles are included in the site-specific assessment.</p> <ul style="list-style-type: none"> • Add wording to new Cycle parking section at paragraph 6.1 to reference the Cycling and Walking Plan for England, July 2020. • Dimensions for cycle parking in new section 11 Parking Space Dimensions to cross reference Cycle Infrastructure Design, Local Transport Note LTN 1/20 July 2020. • New Cycling section to be added (new section 6); Cycle parking standards to be reviewed and new figures to be provided in revised Tables 1 & 2 and new section 7 Disabled Parking. • Emphasis on benefits of cycling altered through wording in new Cycling section, paragraph 6.1. • Guidance on EV charging to be added in new section 4.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> • Be clearer on distinction between cycle parking and storage, in particular paras 4.5/6 and Table 1. • Table 1, 0.5 space for 2 bed flat is far too little, as it is quite likely that 2 adults and one or more children might also live. • SPD should more strongly state benefits of cycling, e.g. for health and the environment. • Disabled Parking to clearly include provision for cycles. In general, cycle parking provision should include EV as for other types of vehicle. • Provision must accommodate non-standard bicycles. • Cycling should be given a key role in Travel Plans. • Provide maximum standards for motor vehicle parking. • Refer to latest documents on cycling policy e.g. Cycling and Walking Plan for England, July 2020; Design Manual for Roads and Bridges updated in 2020. • Department for Transport's Cycle Infrastructure Design (LTN 1/20) sets out minimum standards in the absence of local guidance or standards. • SPD should set minimum standard below which provision should not fall and go further 	<ul style="list-style-type: none"> • Review emphasis in the SPD on benefits of cycling. • Add cycling to Disabled Parking. • Review and consider adding detail on EV for cycles. • Update SPD to use latest versions of documents as appropriate. • Cycle spaces for residential and non-residential will be reviewed in light of recent Government guidance. 	

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<p>than meeting conservative calculation of current cycling demand.</p> <ul style="list-style-type: none"> London Cycle Design Standards provision for cycles should meet future projected demand plus 20%. 		
David Round (07)	<ul style="list-style-type: none"> Supporting response by Simon Dear that SDNPA “should follow the standards set down by the democratically elected, relevant Borough Council in which the land sits and no discrimination should take place either for, or against, any form of transport simply as a result of being in the SDNP. You take on too much as an unelected body, being merely appointed members and officers.” 	<ul style="list-style-type: none"> The NPPF provides for, and encourages planning authorities to set local parking standards within their area. Parking SPD is therefore wholly within the remit of SDNPA as the local planning authority for the National Park. The Parking SPD continues the landscape led approach of the South Downs Local Plan and provides continuity and consistency across the National Park in setting local standards for parking within this protected landscape. 	<ul style="list-style-type: none"> None.
Debbie Evans (08)	<ul style="list-style-type: none"> Consider an increase in the number of unallocated resident and visitor parking spaces in the parking calculator, especially for properties with 3 or more bedrooms Number of houses proposed should be reduced if insufficient space to create a sensible amount of parking, rather than increasing the amount of land required. 	<ul style="list-style-type: none"> Parking calculator uses Census data for the amount of parking suitable for a type of dwelling. As stated in the SPD, the parking calculator is a starting point and guide and only part of the process for determining provision at a residential site. 	<ul style="list-style-type: none"> The use of the parking calculator is a starting point and guide in determining parking provision at a residential site. Add wording to new paragraph 5.1 to make this explicit.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> Should not be assumed that tenure or proximity to bus/train links will mean that residents will increase public transport use. 	<ul style="list-style-type: none"> Agree with comment that seems to support approach taken in the SPD. Agree with comment and the guidance in the SDP is for decision makers to consider public transport as one factor in deciding parking provision. 	
East Meon Parish Council (09)	<ul style="list-style-type: none"> We have a strong bias towards any new development not contributing to on-street parking. In general, EMPC supports this Parking SPD especially the clarity it provides in parking provision, cycle parking and how garages are counted in developments. Like to see SPD strengthened in following areas: Stronger guidance to ensure spaces are usable (e.g. close enough to dwelling, sufficient space around parked vehicle). <p>Materials to be used for parking areas to be specified in guidance.</p> <p>EMPC would like to see a specific requirement for all new dwellings, which have their own driveway and/or garage, to provide a home fast-charging point for electric vehicles.</p>	<ul style="list-style-type: none"> Welcome general support for SPD. Understand concern about on street parking. Guidance in SPD is for on-site provision of parking to avoid adding to existing on street issues. Make this more explicit in the SPD. Agree that spaces provided will need to be usable. Review guidance on this point. Materials for parking areas to be covered by the Design SPD. Agree further detail required on EV charging. 	<ul style="list-style-type: none"> Principle of parking provision on site to avoid additional on street parking, to be made explicit through adding wording to new paragraph 3.2. To ensure spaces are usable, wording to be added in new section 11 Parking Dimensions. Guidance on EV charging to be added in new section 4.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
Marguerite Oxley, Environment Agency (10)	<ul style="list-style-type: none"> I can confirm that we have no comments to make. I can also confirm that we do not believe that the SPD is likely to give rise to significant environmental effects and as such would not require an SEA in relation to the issues in our remit. 	<ul style="list-style-type: none"> Noted that EA confirm no likely significant environmental effects for issues within their remit and as such, no SEA required. 	<ul style="list-style-type: none"> No SEA required. No change required to SPD.
Fareham and Gosport and South Eastern Hampshire CCG (11)	<ul style="list-style-type: none"> Thank you for informing us, we would wish to be informed as applications for housing are brought forward in the future. 	<ul style="list-style-type: none"> Noted. Request passed to appropriate planning team. 	<ul style="list-style-type: none"> None.
Findon Parish Council (12)	<ul style="list-style-type: none"> Findon Parish Council supports the content and aspirations of the draft SPD. 	<ul style="list-style-type: none"> Welcome support for SPD. 	<ul style="list-style-type: none"> None.
Fittleworth Parish Council Planning Sub Committee (13)	<ul style="list-style-type: none"> Concerns about parking in the vicinity of community facilities in Fittleworth. Ask for baseline level of parking for these type of facilities to be taken into account for nearby new development. Ask for guidance to take into account changing parking demand of such community facilities during the day. Ask for clarity on parking standards for such community facilities so as not to wholly restrict or make changes through development impossible to fund. 	<ul style="list-style-type: none"> Noted comments about community facilities, and impact of new development and concerns around overspill parking. Make explicit that SPD requires on site provision to avoid adding to on street parking issues. SPD requires site-specific assessment carried out for non-residential development to include understanding of the parking demand in the local area. Make this more explicit in the guidance. 	<ul style="list-style-type: none"> Principle of parking provision on site to avoid additional on street parking, to be made explicit through adding wording to new paragraph 3.2. Wording to add to new paragraph 8.2 to clarify that site-specific assessment will need to include understanding of existing parking demand in the area.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		<ul style="list-style-type: none"> Guidance requires that peak demand be taken into account. Site-specific assessment would help determine demand for parking for the development with Table 2 acting as a guide. Parking provision on-site would need to meet demand and this has to be factored into the cost. 	
Chris Kneale Friends of Lewes (14)	<ul style="list-style-type: none"> Support landscape approach to parking provision. Concern that each case reviewed on merits might give rise to dispute and delay. SPD should have similar aspiration to Lewes NDP policy AM3 to reduce car use. Suggest SPD addresses EV charging points. 	<ul style="list-style-type: none"> Welcome support for landscape led approach. Parking is often a contentious issue. The flexible approach taken by the SPD puts landscape first in decision-making. The SPD recognises in the short to medium term private cars will continue to make up a significant number of journeys in the rural areas of the National Park where public transport coverage is poor. Support is given in the SPD for the switch to electric vehicles. Agree further detail required on EV charging. 	<ul style="list-style-type: none"> Guidance on EV charging to be added in new section 4.
Stuart York Gosport Neighbourhood	<ul style="list-style-type: none"> Planning policies should ensure the built environment plays it part in reducing crime and disorder and the fear of crime. 	<ul style="list-style-type: none"> Review the points on design in the SPD and how these could better assist in preventing 	<ul style="list-style-type: none"> To ensure design of parking provision prevents crime, bullet

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
Policing Designing Out Crime Officer (15)	<ul style="list-style-type: none"> • In descending order, statistics show that in terms of vehicle crime, the safest place to park a car is a garage; then within the curtilage of a dwelling, followed by private car parks and finally the public realm. • Ask for a section to be added “Preventing Crime and Disorder” and points around a series of features to be included in vehicle parking provision. • Cycle storage within curtilage of dwelling and sufficiently secure. • Community cycle stores sufficiently secure with single robust door entry, good natural surveillance, lockable, keyless to exit and suitable anchor points for securing cycles. • Add additional bullet point to para 3.7 relating to Crime Prevention through Environment Design (CPTED). • Public overspill parking on the highway can increase likelihood of crime or cause obstruction. • Using the (parking) calculator, it is possible to produce a number of dwellings with insufficient parking spaces to allow for each dwelling to have a single parking space. • Ask for minimum of at least one allocated parking space per dwelling. • Ask that at least one secure parking space for a pedal cycle per flat. 	<p>crime. The general requirement for design of new development to improve safety is covered by Policy SD5(1)(j) of the South Downs Local Plan.</p> <ul style="list-style-type: none"> • Cycle spaces for residential and non-residential development will be reviewed in light of recent Government guidance. • Make explicit that SPD requires on site provision to avoid adding to on street parking issues. • Guidance requires on-site parking provision to meet the need of the development and the split between allocated and unallocated spaces would be subject to detailed discussion between applicant and SDNPA. 	<p>points to be added at new paragraph 3.8</p> <ul style="list-style-type: none"> • New Cycling section to be added (new section 6); Cycle parking standards to be reviewed and new figures to be provided in revised Tables 1 & 2 and new section 7 Disabled Parking. • Principle of parking provision on site to avoid additional on street parking, to be made explicit through adding wording to new paragraph 3.2.

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Greatham Parish Council (16)	<ul style="list-style-type: none"> For ease of access, spaces should be laid out side by side rather than one in front of the other. Greatham PC feels that 1 charging point per new build house should be provided as a minimum. Remove the word “feasible” from Parking SPD on this point in relation to EV charging points. Parking spaces for new build properties should be adjacent to the property. Maximum distance between the house and the parking space should be specified in the SPD. 	<ul style="list-style-type: none"> Review points on design of parking provision in the SPD. Agree further detail required on EV charging. The word “feasible” in relation to EV charging points is used in South Downs Local Plan policy SD22, criteria 4a). The SPD seeks to explain and amplify and cannot alter or amend adopted policy. Detailed guidance on layout of parking provision will be covered in the forthcoming Design SPD. 	<ul style="list-style-type: none"> To avoid use of tandem parking, bullet point to be added at new paragraph 3.8 Guidance on EV charging to be added in new section 4.
Harry Puckering (17)	<ul style="list-style-type: none"> Please make at least one cycle space available for each assumed occupant of residential properties: 2 spaces for 1 bed property, 4 spaces for 2-bed property etc. Please allow commercial properties to have parking for 80% of projected visitors, as in the Netherlands. Please include parking for children’s cycles in the above. Please note cargo bikes/adapted bikes/trikes for people with disabilities need much more room than conventional bikes: up to 2m in 	<ul style="list-style-type: none"> Cycle spaces for residential and non-residential development will be reviewed in light of recent Government guidance. 	<ul style="list-style-type: none"> New Cycling section to be added (new section 6); Cycle parking standards to be reviewed and new figures to be provided in revised Tables 1 & 2 and new section 7 Disabled Parking. Revised Table 2 to include standards for larger/oversize cycles. Dimensions for cycle parking in new section 11 Parking Space Dimensions to cross reference

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	width and longer turning areas as machines cannot be lifted.		Cycle Infrastructure Design, Local Transport Note LTN 1/20 July 2020.
Highways England (18)	<ul style="list-style-type: none"> There is a strong emphasis on sustainable travel and transport throughout the document, which Highways England (HE) supports. Recommend that minimum parking space size is something that could be included in Table 2. Recommend adding text Transport Assessment (TA) or Transport Statement should accompany new site applications. TA only mentioned at para 5.2 in relation to disabled parking. Recommend additional parking standard added to Table 2 for last mile delivery depots as these sites are outside B8 Storage and Distribution use class. HE has found useful to include pictures/visuals for favoured parking arrangements and layouts. HE does not consider the SPD will have any adverse impacts on the safety, reliability and operation of the strategic road network. 	<ul style="list-style-type: none"> Welcome support for emphasis on sustainable means of travel and that HE considers SPD will not have adverse impact on the strategic road network. Review the guidance in relation to the use of minimum parking space dimensions. Transport Assessment/Statement are required by the NPPF paragraph 111, therefore considered repetition of national policy to include in the SPD. Review guidance in Table 2 in relation to last mile delivery depots. Forthcoming Design SPD will provide detailed guidance on the layout of parking spaces/areas. 	<ul style="list-style-type: none"> Minimum dimensions for spaces to be added to new section 11 Parking Dimensions. To ensure last mile delivery depots are considered in site-specific assessment for non-residential development, wording to be added to new paragraph 8.3.
Alan Byrne Historic England (19)	<ul style="list-style-type: none"> Historic England does not wish to comment on the Parking Supplementary Planning Document, which deals with matters largely beyond the remit of Historic England. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.

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Horndean Parish Council (20)	<ul style="list-style-type: none"> Noted the consultation and no comments to make. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None
Imogen Makepeace (21)	<p>(Representation included comments about the wider shift from motor vehicles to other forms of transport. Comments below are specific to parking).</p> <ul style="list-style-type: none"> Parking places in towns are often expensive to build, ugly, accumulate toxic runoff and take up valuable space. Pavement parking is a new kind of Anti-Social Behaviour. New developments can have purpose built walking and cycle routes and prioritise public transport. Residential developments in or near town centres need fewer car parking and more and better cycle parking provision. Planning for parking spaces must recognise that the majority of urban developments need to reduce space for private cars and increase space for public transport hubs, bicycle parking, taxi ranks. I support the assessment for increased cycle spaces submitted by Cycle Lewes. 	<ul style="list-style-type: none"> SPD sets out guidance that is flexible to meet the needs of a specific development whilst putting landscape at the centre of decision making in a protected landscape. The guidance has a flexible approach to deliver less parking where appropriate on sites that are well connected to other means of transport. Make explicit that SPD requires on site provision to avoid adding to on street parking issues. Detail on the design of parking will be covered in the forthcoming Design SPD. Review whether SPD could require space for car clubs and taxis at appropriate locations. Cycle spaces for residential and non-residential development will be reviewed in light of recent Government guidance. 	<ul style="list-style-type: none"> Principle of parking provision on site to avoid additional on street parking, to be made explicit through adding wording to new paragraph 3.2. To ensure car clubs and taxis are considered in parking provision, wording to be added at new paragraph 5.5 and 8.3 respectively. New Cycling section to be added (new section 6); Cycle parking standards to be reviewed and new figures to be provided in revised Tables 1 & 2 and new section 7 Disabled Parking.
John Evans (22)	<ul style="list-style-type: none"> Main concern in Coldwaltham is “leisure” parking by visitors. Particular areas with high 	<ul style="list-style-type: none"> Note the concerns about parking issues in Bury regarding visitors and the local school. 	<ul style="list-style-type: none"> None.

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	<p>demand at certain times without suitable parking such as Bury Hill.</p> <ul style="list-style-type: none"> Local primary school has no provision for pick up/drop off, or for part time staff and only 8 parking places. 	<p>The issues relating to existing sites and visitors that have been raised are matters for the local highways authority, the district council and the local education authority.</p> <ul style="list-style-type: none"> SPD requires on-site parking provision to meet the need of the development and avoid adding to existing on street parking issues. 	
Judy Fowler Chichester District Councillor (23)	<ul style="list-style-type: none"> Raising issue of pavement parking in Midhurst, with photo showing an example in Grange Road. 	<ul style="list-style-type: none"> In the SPD a key principle, which is proposed to be made more explicit, is for on-site parking provision to meet the need of the development and avoid adding to existing on street parking issues which are of concern in Midhurst and many other settlements in the National Park. Existing issues such as the pavement parking highlighted are matters for the local highways authority and the district council. SDNPA will assist these bodies wherever possible in providing solutions. As stated above this includes providing guidance for parking 	<ul style="list-style-type: none"> Principle of parking provision on site to avoid additional on street parking, to be made explicit through adding wording to new paragraph 3.2.

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		at new developments that avoids adding to existing parking issues.	
Julia Waterlow (24)	<ul style="list-style-type: none"> • SDNPA should be considering how to reduce car usage rather than encourage it by insisting on car parking in new developments. • Developers should contribute towards local bus services or car share system. • If insisting on car parking, not enough emphasis (in the SPD) on design of car parking. Concerns about hard landscaping and water run-off. • New car parking should have permeable surfaces and water treatment to deal with vehicle pollution. • Need planting to soften the impact and provide biodiversity. 	<ul style="list-style-type: none"> • The SPD recognises in the short to medium term private cars will continue to make up a significant number of journeys in the rural areas of the National Park where public transport coverage is poor. Support is given in the SPD for the switch to electric vehicles. • Existing planning policies allow decision makers to require developers to contribute to other forms of transport as appropriate. • Note concerns about design of car parking, specifically landscape treatments and run off. Policy SD22 of the South Downs Local Plan requires that developments incorporate appropriate sustainable drainage systems. • The forthcoming Design SPD will cover landscape and surface treatments including planting. 	<ul style="list-style-type: none"> • None.

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Kate Simons Senior Environmental Protection Officer Chichester District Council (25)	<ul style="list-style-type: none"> The references to provision of cycle parking and electric vehicle charging points are welcomed and I have no further comments to make. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Katherine Pang East Hampshire District Council (26)	<ul style="list-style-type: none"> Para 4.4. clarify whether referring to internal or external measurements for garages. (For Table 2) clarify whether for non-residential development, floor space calculations are Gross External Area (GEA) or Gross Internal Area (GIA). No mention in guidance of appropriate layouts. Appears to be no guidance on required dimensions for parking spaces. 	<ul style="list-style-type: none"> Clarify description of measurements. Detailed on parking design in the forthcoming Design SPD. Agree further detail needed on the dimensions of parking spaces. 	<ul style="list-style-type: none"> Add wording to clarify measurements refer to Gross Internal Area at new paragraphs 5.7, and 8.11 Minimum dimensions for spaces to be added to new section 11 Parking Dimensions. Dimensions for cycle parking in new section 11 Parking Space Dimensions to cross reference Cycle Infrastructure Design, Local Transport Note LTN 1/20 July 2020.
Kelsie Learney Winchester City Councillor (27)	<ul style="list-style-type: none"> Object to the draft document in particular due to the proposed provision of cycle parking. Document fails to comply with Local transport note 1/20 Cycle infrastructure design which has updated expected standards. As per the transport note residential developments should have ground floor, secure, level access cycle storage with one space per bedroom 	<ul style="list-style-type: none"> Objection noted. Cycle spaces for residential and non-residential development will be reviewed in light of recent Government guidance. This includes reference to parking for bicycles with disabled adaptations, standards for long term and minimum levels of cycle parking. 	<ul style="list-style-type: none"> New Cycling section to be added (new section 6); Cycle parking standards to be reviewed and new figures to be provided in revised Tables 1 & 2 and new section 7 Disabled Parking. These standards comply with Cycle Infrastructure Design, Local Transport Note, LTN 1/20.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> Particular reference needs to be made to requirements for parking suitable for bikes with disabled adaptations - note this has equalities implications. Reference should be made to need for short term non-residential parking to be located where it is both convenient and obvious not just specify a quantum. Levels of secure long-term cycle parking need to be included separately. Where requirement relates to a travel plan a minimum level of cycle parking should still be set. Garages – clarify that specifications are minimum internal sizes Garages – if used for cycle parking, should be large enough to allow for at least two cycles in addition to a car. 	<ul style="list-style-type: none"> Clarify description of measurements. Preference in SPD is for other forms of parking space to be provided other than a garage. Cycle parking better provided in other forms than part of a garage. 	<ul style="list-style-type: none"> Minimum dimensions for spaces to be added to new section 11 Parking Dimensions. Dimensions for cycle parking in new section 11 Parking Space Dimensions to cross reference Cycle Infrastructure Design, Local Transport Note LTN 1/20 July 2020.
Liss Parish Council (28)	<ul style="list-style-type: none"> LPC welcome consideration of policy SD5; clarity of para 7.38 for definition of a bedroom and paras 4.3/4 relating to minimum garage sizes and their provision counting towards a third of a space. For parking calculator concern that use of ward data means centre of Liss will be judged the same as more rural locations in the parish. We would like SDNPA to provide evidence of real world test cases that parking 	<ul style="list-style-type: none"> Welcome support for those specific parts of the SPD. SPD states that the output from the parking calculator is a starting point and a guide for determining parking provision. Review wording for parking calculator and consider whether can be made clearer. SPD does state that conditions may exist for a lower parking 	<ul style="list-style-type: none"> To be more explicit that the parking calculator is a starting point and guide in determining provision, wording to be added to new paragraph 5.1. Principle of parking provision on site to avoid additional on street parking, to be made explicit through adding wording to new paragraph 3.2.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<p>calculator delivers results that comply with the landscape led principle.</p> <ul style="list-style-type: none"> Challenge paras 3.9-3.12 that Liss offers a higher level of public transport options and as result should expect a lower level of parking provision. Train service, slow hourly service between Portsmouth and London. Bus service, three per day between Alton and Petersfield with no service after 6pm or on weekends. Assumption that these services will enable car-less households is not reasonable. Family households will continue needing at least one, if not two to three cars. Concern is that sustainable location principle when applied to Liss will result in under provision of on-site parking leading to overspill on streets/pavements. Critical that officers have complete understanding of local public transport options and existing parking issues in relation to para 3.11. Consider: i) tandem parking and associated issues; and ii) changes to permitted development allowing (for example) smaller 2 bed dwellings through building up or loft conversion to become larger 4 bed dwellings. SDNPA to commit to a 6-month review of parking standards to assess operation of SPD 	<p>provision although the onus is on the applicant to provide robust evidence to justify a reduced figure. Review wording on the sustainable location principle.</p> <ul style="list-style-type: none"> There is no assumption on the part of SDNPA that specific locations in Liss or the other named settlements will meet the conditions for a lower parking provision. Add wording to clarify the LPA position. Add wording on tandem parking. Changes to permitted development for “enlargement of a dwellinghouse by construction of additional storeys” do not apply in National Parks. [Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), Schedule 2, Part 1, AA.1 b) i)] Review of SPD will be carried out as appropriate, especially if feedback from decision makers 	<ul style="list-style-type: none"> Wording to be added to new paragraphs 3.11/3.12 to be explicit that no assumption is made a site located in one of the five named settlements, including Liss, is more sustainable by default. Add wording to new paragraph 3.12 that parking survey will be required as part of robust evidence to justify lower provision. Add bullet point to new paragraph 3.8 that tandem parking should be avoided in new development.

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	in consultation with local planning committees.	suggests the policy is failing to meet intended outcomes.	
Midhurst Society (29)	<ul style="list-style-type: none"> We have considered your draft document and generally welcome the proposed procedures and support and look forward to its adoption and implementation on all future developments thereby ensuring amongst other things all associated parking will be within the confines of the development. 	<ul style="list-style-type: none"> Welcome support for the SPD and note the comment that guidance will ensure sufficient parking is provided on-site at a new development. 	<ul style="list-style-type: none"> None.
Midhurst Town Council (30)	<ul style="list-style-type: none"> In general support this document. Recognise that while Midhurst seen as sustainable location in the SPD, off street parking continues to be a problem in the town. Welcome landscape led, flexible approach that each development will be regarded on its merits. 	<ul style="list-style-type: none"> Welcome the support for the landscape led and flexible approach. Note comments about off street parking issues in Midhurst. SPD requires on-site parking provision to meet the need of the development and avoid adding to existing on street parking issues. 	<ul style="list-style-type: none"> None.
National Trust (31)	<ul style="list-style-type: none"> Overarching principles of landscape led and sustainable location are appropriate and the clear explanation of how they are to be interpreted and applied is welcome. SPD could provide greater clarity and guidance on a couple of areas relating to non-residential development; i) greater clarity over whether sites with multiple uses would be assessed against primary use or a hybrid approach ii) provide guidance on parking 	<ul style="list-style-type: none"> Welcome comments supporting the approach taken by the SPD. Review wording for non-residential sites in relation to multi use developments. Site specific assessment required for non-residential sites and this process will cover the provision of different types 	To clarify guidance on sites with multiple land uses including visitor attractions in the National Park, wording added to new paragraph 8.4

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	provision to meet different demands on a site e.g. permanent and overflow parking, with different surface treatments for each type, to meet overall parking demand.	of provision including surface treatment.	
Natural England (32)	<ul style="list-style-type: none"> Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. As the SPD is about a car parking charging strategy for the National Park, it is unlikely there will be significant impacts to designated sites from the SPD. 	<ul style="list-style-type: none"> Noted. Notified Natural England about scope of Parking SPD and asked if wanted to comment further. No further comment received in response. 	<ul style="list-style-type: none"> Natural England state no requirement for Strategic Environmental Assessment.
Patching Parish Council (33)	<ul style="list-style-type: none"> Patching Parish Council (PPC) broadly supports the SPD. Welcome approach of parking calculator and two principles (for residential development) to determine parking requirements. PPC considers this approach will support compliance with Patching NDP policy and objectives. Consider ward data too coarse and that Findon parish data will be disparate and not reflective of Patching community. PPC considers further emphasis needed on the application of the two principles due to coarseness of data used for parking calculator. 	<ul style="list-style-type: none"> Welcome the support for the approach taken and that Parish Council view is this will support NDP policies. Note particular concerns around on street parking and visitor parking in Patching. Ward is smallest unit where Census data is available for car ownership by type of dwelling. Review wording in guidance on the parking calculator. Agree that on street parking problems are significant issue across SDNPA communities. Add wording to make explicit 	<ul style="list-style-type: none"> Principle of parking provision on site to avoid additional on street parking, to be made explicit through adding wording to new paragraph 3.2. Add wording in new paragraph 5.1 to make explicit that parking calculator is a starting point and a guide and decision makers will still need to exercise their judgement in determining parking provision.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> Support the application of the two principles in determining parking provision for non-residential development. PPC welcomes highlighting of the Local Plan policies that are of particular relevance to the SPD. Opportunity for SPD to provide further emphasis on the impact of on street parking on rural character of SDNPA communities. PPC note reference in SPD to public parking and SD22. PPC would wish to see greater and specific emphasis on avoidance of increasing traffic movements through and within communities in relation to public parking. 	<p>that new development needs to provide parking on site to meet demand and avoid adding to existing on street issues.</p> <ul style="list-style-type: none"> Avoiding traffic movements through and within communities as a result of public visitor parking is a matter for the highway authority. SDNPA will seek to assist with solutions including through the guidance in the SPD requiring on-site parking to meet the demand at new development to avoid adding to existing on street issues. 	
Richard Alderman (34)	<ul style="list-style-type: none"> Comments with particular reference to Hill View, East Meon. Importance of garage area at the top of Hill view providing parking and overflow for land to the south. Please could you ensure this area is safeguarded/improved for much needed parking in the area. 	<ul style="list-style-type: none"> Noted comments and concerns about parking issues in Hill View and the importance of the specific area of garages. SPD cannot provide safeguarding for specific areas. However, as general principle SPD requires on-site parking provision to meet the need of the development and avoid adding to existing on street parking issues. Add wording to make this more explicit and for applicants to demonstrate 	<ul style="list-style-type: none"> Add wording as a general principle to new paragraph 3.2 to make explicit that all necessary vehicular parking will be on-site to avoid additional on street parking and; that applicants will need to demonstrate understanding of current parking demand in the local area to avoid additional on street parking.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		understanding of current parking demand in the local area.	
Roger Mullenger (35)	<ul style="list-style-type: none"> Are "staff" defined as (the) maximum number on site at one time(s)? Does this take account of shift patterns and more remote working? 	<ul style="list-style-type: none"> SPD does require site specific assessment to take into account peak periods of demand. There is no definition for staff in the SPD. Review wording for non-residential section in relation to staff parking provision. 	<ul style="list-style-type: none"> Add wording in new paragraphs 8.6 and 8.11 to add further detailed guidance for parking provision, including for staff.
Rowlands Castle Parish Council (36)	<ul style="list-style-type: none"> In general, Council welcomed the SPD's proposed calculation methods and prioritisation of the need for sufficient parking space, given vehicle use/ownership are likely to be features of daily life for some time yet. Council surprised that, unlike EHDC Vehicle Parking Standards, no guidance on parking provision for fuel stations, in particular those with an integrated shop, or sites for gypsy, travellers and travelling showpeople, or mobile home parks. Council gratified that SPD recognises garages often put to other uses than parking and (i) that (other forms) of parking provision (are) best provided (ii) garage when provided counted as third of space. 	<ul style="list-style-type: none"> Welcome general support for approach taken by the SPD. Table 2 in SPD for non-residential is not exhaustive. Preceding paragraphs state need for site specific assessments in determining parking provision and these would be used for the types of use described by the Parish Council. Welcome support for approach on garages. 	<ul style="list-style-type: none"> None.
Sheet Parish Council (37)	<ul style="list-style-type: none"> Concerned regarding new development where roads are private and under control of a management company. 	<ul style="list-style-type: none"> Note concerns about new development with "un-adopted" 	<ul style="list-style-type: none"> When granting planning permission, SDNPA will be satisfied that, the residential

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> Management company can impose restrictions to prevent parking of certain types of vehicle e.g. vans. These vehicles are then parked on nearby streets, creating or adding to, local parking issues. This means that the parking associated with the planning consent is effectively reduced. 	private roads and potential for restrictions to effect parking.	scheme has sufficient parking to accommodate the needs of the development. A general condition can be included that the parking shown on a site plan is provided and retained. However, the behaviour of a management company, such as restricting the parking of vans, is ultra vires to the Local Plan, the Parking SPD and the planning process, if there is no action contrary to approved plans and conditions. This is a civil matter rather than a planning issue.
Simon Auty (38)	<p>Comment on paragraphs 4.1/4.2.</p> <ul style="list-style-type: none"> SPD should define the algorithm that is implemented in the spreadsheet. Process should be clearly explained in words, possibly also with relevant equations. I think it is important that users of the spreadsheet understand what it is doing. Users will then have more confidence in the results from the spreadsheet, and will be better able to use the results from it, as described elsewhere in the document. 	<ul style="list-style-type: none"> Provide more information on the data the parking calculator uses and how it works. 	<ul style="list-style-type: none"> Add further detail about the parking calculator, as well as further explanation of the output by decision makers, in new paragraphs 5.1 and 5.2.
Simon Dear Waverley Borough & Haslemere Town Councillor (39)	<ul style="list-style-type: none"> In my view, parking policy etc. should follow the standards set down by the democratically elected, relevant Borough Council in which 	<ul style="list-style-type: none"> NPPF provides for and encourages planning authorities to set local parking standards 	<ul style="list-style-type: none"> None.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<p>the land sits and no discrimination should take place either for, or against, any form of transport simply as a result of being in the SDNP.</p> <p>You take on too much as an unelected body, being merely appointed members and officers.</p>	<p>within their area. Parking SPD is therefore wholly within the remit of SDNPA as the local planning authority for the National Park.</p> <ul style="list-style-type: none"> The Parking SPD continues the landscape led approach of the South Downs Local Plan and provides continuity and consistency across the National Park in setting local standards for parking within this protected landscape. 	
South Downs Network (40)	<p>Overall focus of submission is reducing reliance on the motor vehicle due to the effect of emissions on climate change.</p> <ul style="list-style-type: none"> Provision should be made for parking laybys for delivery vehicle. The surfacing of all car parking should use porous surfaces and not tarmac. This would reduce surface water run off (flooding) and reduce the use of tarmac which is partly made from a fossil fuel by-product (bitumen) Provision should be made for electric motorcycle parking. Public car parks and on street parking should also include electric charging points for cars 	<ul style="list-style-type: none"> Agree that change to forms of transport that reduce the impact on climate change is very important. In this regard, the SPD supports the switch to electric vehicles. However, the SPD also recognises in the short to medium term private cars will continue to make up a significant number of journeys in the rural areas of the National Park where public transport coverage is poor. SPD requires provision for visitor parking and this can be used by delivery vehicles rather than separate dedicated spaces 	<ul style="list-style-type: none"> Guidance on EV charging to be added in new section 4. Minimum dimensions for spaces to be added to new section 11 Parking Dimensions. New Cycling section to be added (new section 6); Cycle parking standards to be reviewed and new figures to be provided in revised Tables 1 & 2 and new section 7 Disabled Parking. Dimensions for cycle parking in new section 11. Parking space dimensions to cross reference Cycle Infrastructure Design,

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> Commercial development and tourist sites should make provision for bicycle charging points Parking provision should be made for bus facilities and turning circle space in larger commercial and residential developments. Bus layby parking should be provided for all small & medium sized developments Address parking demand for changes of use from agricultural to Class E (commercial, business, service), Class B2 (General Industrial), B8 (Storage & Distribution). Parking provision for tourism/shops ensuring suitable provision following change of use. Parking provision for festival concert sites/out of town developments, avoid large car parks in out of town locations and encourage use of trains and buses for getting to/from venues. Provide suitable parking for people with children and prams in all types of development. Maximise cycling parking in all developments as encourage change in behaviour towards more active transport methods, including secure and overnight parking. Flats/houses should have secure cycling parking spaces at rate of one per bedroom. Where there is good public transport parking allocation should be discouraged. 	<p>that will only be used intermittently.</p> <ul style="list-style-type: none"> Further detailed guidance on the design of parking will be in the forthcoming Design SPD. Guidance on EV charging to be added. Guidance on bus and larger vehicle turning circles is provided in existing technical guidance and would be part of detailed discussions at application stage. Strategic discussions between the local transport/highways authority and bus companies would determine locations and provision of bus stops. Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) permits development for change of use of agricultural buildings to “flexible commercial use” that includes Class E (old A1/2/3, B1 uses), and B8. These specific changes of use are permitted development under the 	<p>Local Transport Note LTN 1/20 July 2020.</p> <ul style="list-style-type: none"> To ensure car clubs are considered in parking provision, wording to be added at new paragraph 5.5.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> • Cycle parking at bus and railway stations should be enclosed structures for percentage of forecasted users. • Encourage car clubs and reference in SPD. • Support references to NPPF, relevant Local Plan policies, NDP parking policies and the design principles. Also support: parking part of design process from the start, use of two principles, including a lower parking provision where conditions may exist to do so; local studies looking at transport options as part of evidence for lower parking provision and; creating new active travel routes linking to sustainable transport network for better connectivity and options other than the private car. • Recommend that unless there is evidence proving it is logistically or economically unrealistic, electric vehicle charging facilities must also be provided. • Residential parking, SPD does not actively encourage reducing number of car parking spaces where there are good transport links. • Garages concerned that built but never used for garaging. • Requirements for disabled parking should be clearly documented. • Public parking; design should minimise visual impact; secure parking and EV charging 	<p>Regulations. Therefore, South Downs Local Plan policy and the Parking SPD cannot be applied in this specific circumstance.</p> <ul style="list-style-type: none"> • Parking provision at shops/tourism locations/festival concert sites/out of town developments is covered in the non-residential section, unless this is for permitted development change of use (see previous bullet point). SPD requires that site specific assessment be carried out for all these types of development along with applying specific standards where listed in Table 2. • Add parking dimensions to SPD to ensure spaces are suitable for people with children and prams. For non-residential development site specific assessment considers needs of different users. • Cycle spaces for residential and non-residential development will be reviewed in light of recent Government guidance. 	

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	provided; include parking for car sharing schemes; providers should be encouraged to enter into arrangements for cycle share schemes.	<ul style="list-style-type: none"> • SPD allows for lower parking provision where robust evidence provided that the correct conditions exist. • Guidance in the SPD applies to new development. Existing cycling parking provision at bus and railway stations is a matter for the operators of those facilities. • Review whether SPD could require space for car clubs. • Welcome support for the various elements of the SPD. • Guidance on EV charging to be added. • SPD allows for lower parking provision where robust evidence provided that the correct conditions exist. SPD recognises that provision for private cars needs to be made to avoid adding to existing on street parking issues. • Agree with comment on garages, SPD only counts garages as third of space therefore significantly preferring other types of parking provision. 	

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		<ul style="list-style-type: none"> • Agree, add wording on dimensions of disabled parking spaces. • Requirements for public parking are covered in policy SD22 of the Local Plan. 	
Susan Garnett (41)	<ul style="list-style-type: none"> • Concerned about commuter parking, particularly for Bramshott and Liphook as well as Petersfield. • Stations and town centres need adequate parking. • Increased commuter parking at Liphook from Borden housing development. Commuters need to drive in absence of good links from settlements by public transport. 	<ul style="list-style-type: none"> • SPD requires on-site parking provision to meet the need of the development and avoid adding to existing on street parking issues. This would include new development nearby to railway stations. • Adequate parking at, and providing public transport connections to, railway stations is a matter for the local transport authority and Network Rail. More generally, SDNPA will work in partnership with these bodies, where assistance can be given, in finding solutions to the commuter parking issue. 	<ul style="list-style-type: none"> • None.
Titchborne Parish Council (42)	<ul style="list-style-type: none"> • Titchborne PC fully supports the rationale of the Parking SPD. 	<ul style="list-style-type: none"> • Welcome support and noted. 	<ul style="list-style-type: none"> • None.
West Sussex County Council (43)	<ul style="list-style-type: none"> • Para 2.7 No indication of levels/percentage of spaces to be provided with EV charging points. 	<ul style="list-style-type: none"> • Agree, guidance on EV charging to be added. 	<ul style="list-style-type: none"> • Guidance on EV charging to be added in new section 4.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> Paras 3.11/12 Recommend parking survey for the area if lower provision being proposed than indicated by the parking calculator. A scheme proposing a lower provision should also be directed to the respective Highways Authority. Para 4.4 Garages – 1 garage to be counted as third of parking space. No mention of how this is included in the parking calculator or factored into allowing for this in meeting overall parking demands. Para 5.1 Clarify the basis on which 5% for disabled parking has been derived. Para 5.2 May be appropriate to include dimensions for disabled spaces if on-plot provision is expected to ensure accessibility. Para 6.3 Reference should also be made to cycle parking provision, and that this is covered and secure. Para 7.1 Recommend parking surveys follow the Lambeth Methodology Table 2 Clarify whether references to use align with the updated use classes that came into effect on 1/9/2020 (Explanatory memorandum 2020 No.757) WSCC would look for the SPD to include guidance and standards on EV charging. 	<ul style="list-style-type: none"> Agree, add wording regarding parking survey required if proposing lower provision than the output from the parking calculator as the starting point. Parking calculator is used to help determine the amount of parking needed. The applicant can decide whether to use garages to meet the parking demand for the site. However, as SPD states a garage counts only a third of space towards parking provision. Therefore, more spaces of other types would be required to make up the shortfall. Disabled parking figure follows that used in West Sussex parking guidance. Add dimensions of disabled parking. Cycle parking for residential and non-residential development will be reviewed in light of recent Government guidance. Add wording to reference Lambeth Methodology. 	<ul style="list-style-type: none"> Add wording to new paragraph 3.12 requiring parking survey if provision lower than output from the parking calculator. Minimum dimensions for spaces to be added to new section 11 Parking Dimensions. New Cycling section to be added (new section 6); This section to cross-reference and comply with the guidance in Cycle Infrastructure Design, Local Transport Note, LTN 1/20, that covers matters including security and provision of covered cycle parking. Add wording to new paragraph 9.1 that parking capacity surveys should be carried out using the Lambeth Methodology.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		<ul style="list-style-type: none"> Types of development in Table 2 cover the use classes as updated in September 2020. 	
Jill Lee, Winchester City Council Planning Policy (44)	<ul style="list-style-type: none"> Thank you for the opportunity to comment on your recent parking SPD. I can confirm that we have no comments to make. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.

Appendix 2

Draft Parking SPD: Summary of comments received February-March 2021 and officer comments

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
Arundel Town Council, Interim Planning Advisory Committee (45)	<ul style="list-style-type: none"> The Committee are in full support of this document 	<ul style="list-style-type: none"> Welcome support and noted 	<ul style="list-style-type: none"> None
Bramber Parish Council (02a)	<ul style="list-style-type: none"> 6.2 Table I below sets out the minimum recommended levels of cycle parking provision for new residential development (reflects wording in Table I I-I of Local Transport Note 1/20 Table I – Minimum cycle space provision, new residential development 	<ul style="list-style-type: none"> Cycle Infrastructure Design, Local Transport Note (LTN) 1/20 uses the wording “suggested minimum” in Table I I-I. The SPD is consistent with LTN 1/20. Footnotes 10/11, below Table I in the SPD, clarify this point. 	<ul style="list-style-type: none"> None
Bramshott and Liphook Parish Council (03a)	<ul style="list-style-type: none"> Clarifying issue raised in first consultation concerning inadequate parking provision at transport interchanges. 	<ul style="list-style-type: none"> Agreed. Suitable parking provision needed at transport interchanges. However, the SPD guides new development. Requiring existing transport interchanges to increase their parking provision is outside the scope of the SPD. If redevelopment of a transport interchange is proposed, site assessment, as stated by paragraph 8.2 in the SPD, will be required. The site assessment 	<ul style="list-style-type: none"> None

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		<p>will include understanding existing parking demand in the local area of the site to determine the appropriate level of parking, as stated in paragraph 8.2.</p> <ul style="list-style-type: none"> • Adequate parking at, and providing public transport connections to, railway stations is a matter for the local transport authority and Network Rail. 	
Buriton Parish Council (04a)	<ul style="list-style-type: none"> • Amend Ward name to Buriton & East Meon in drop down list in the Parking Calculator (point 1) • Concerns about use of the parking calculator, including interpretation of wording at paragraph 3.2 and 5.1 (points 2-9) • Rounding down of spaces in paragraph 5.4 must not happen (point 10) • Storage structures for cycle parking; Paragraph 6.3 no mention of design; suggest larger garage size to accommodate cycles. • Greater emphasis on permeable surfaces for parking 	<ul style="list-style-type: none"> • Ward name to be amended in Parking Calculator drop down list • Paragraphs 3.1 and 5.1 both state the output from the parking calculator is only one factor for decision makers in determining parking provision for residential development. Decision makers will need to exercise judgement and the process will include a range of other information as stated. Paragraph 3.2 is read in the widest sense as covering all types of development from single to large multiple dwelling schemes. In some cases with a 	<ul style="list-style-type: none"> • Amend Ward name to Buriton and East Meon in the Parking Calculator.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		<p>single dwelling parking on the plot may be impractical. Guidance is flexible to allow decision making on a case-by-case basis. In respect of the Sustainable location principle, this is stated in paragraph 3.12. SPD states in paragraph 3.5 that a lower quantum of development may be required. As stated this is where accommodating parking provision to meet the need of the level of development will have an adverse landscape impact i.e. proposals will have to change to have lower level of development with resultant less parking.</p> <ul style="list-style-type: none"> • Standard mathematical procedure used to round up or down the output from the parking calculator as explained in paragraph 5.4. However, key point is overarching principle in paragraph 3.1 where all factors taken into account and the output from the parking calculator is only one consideration. 	

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		<ul style="list-style-type: none"> Forthcoming Design SPD will provide guidance on the design of cycling parking as stated at the end of paragraph 6.3. Paragraph 5.7 states the garage size is a minimum requirement. Design SPD will include guidance on larger garage spaces for cycles. Forthcoming Design SPD will provide guidance on design of spaces, as stated in paragraph 3.8, including sustainable drainage and the use of permeable surfaces. 	
Debbie Evans (08a)	<ul style="list-style-type: none"> Follow up on parking calculator query raised concerning number of spaces provided for development in a specific example – 20 x 3 bedroom (5 habitable room) dwellings with 2 spaces allocated per dwelling. Concerned about under provision of visitors space in example. 	<ul style="list-style-type: none"> The output of the parking calculator is in the context of the key principles of the guidance. Parking provision will be determined using the two principles of landscape led and sustainable location in conjunction with the output from the parking calculator for residential development (paragraph 3.1) and all necessary vehicular parking should as far as practicable be on-site to avoid additional on street parking (paragraph 3.2). 	<ul style="list-style-type: none"> None

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		Paragraph 5.1 further explains use of the parking calculator as a starting point and guide. Further decision makers must take into account all relevant information, of which the parking calculator is one part.	
Denis Bass (46)	<ul style="list-style-type: none"> No comment 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None
Elsted and Treyford Parish Council (47)	<ul style="list-style-type: none"> Paragraph 2.11, suggest amending end of last sentence to “have greater weigh”, rather than “be taken into account” in relation to conflict between different sets of parking standards. 	<ul style="list-style-type: none"> The wording comes from legal opinion on the specific relationship between sets of policies, in this case parking standards, in different plans. Current wording defers to the latest parking standards. Retain current wording as this is in line with the legal opinion. 	<ul style="list-style-type: none"> None
Marguerite Oxley, Environment Agency (10a)	<ul style="list-style-type: none"> No comment. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None
Findon Parish Council (12a)	<ul style="list-style-type: none"> Supports content and no further comments 	<ul style="list-style-type: none"> Welcome support. 	<ul style="list-style-type: none"> None
Fittleworth and District Association (48)	<ul style="list-style-type: none"> Thank you for opportunity to comment no matters that wish to raise. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None
Fittleworth Parish Council (13a)	<ul style="list-style-type: none"> Thank you for addressing our queries on the draft. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None
Graham Beck (49)	<ul style="list-style-type: none"> Garages, or perhaps carports, are best for achieving objectives of parking being well 	<ul style="list-style-type: none"> For the reasons stated in paragraph 5.6, forms of parking 	<ul style="list-style-type: none"> None

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<p>integrated in the public realm and cycle storage being safe and secure.</p> <ul style="list-style-type: none"> • To encourage residents to use the garage for the intended purpose, dimensions should be large enough to accommodate larger family car with at least two cycles. • Introduction of electric car charging means garages will also be used for this purpose. • Current draft guidance is highly likely to exert pressure on developers not to provide any garage spaces leading to greater numbers of car on display, thus creating less pleasant place to live in terms of visual amenity. • Properly constructed garages designed for modern day purposes should be given full credit of one parking space rather one third only. 	<p>provision, other than garages, are preferred in the SPD. There is no guarantee residents will use garages for parking, where they are of the appropriate size to accommodate cars and bicycles as suggested. Developments that include garages still involve provision of parking spaces in other forms. Therefore, there will still be visual impact from parking vehicles. Well-designed parking to minimise visual impact is the approach promoted by the SPD and the forthcoming Design SPD.</p>	
Hambledon Parish Council (50)	<ul style="list-style-type: none"> • Welcome the SPD and clear statement of principles. • Hopes sufficient account taken of likely very significant move in the next 10 years towards use of Electric Vehicles and provision of charging points. 	<ul style="list-style-type: none"> • Welcome support for the SPD. • Standards for Electric Vehicle (EV) charging points are consistent with the guidance in the Sustainable Construction SPD. Agreed that in future, the appropriateness of the standards for EV charging points to be reassessed as part of a review of the Parking SPD. 	<ul style="list-style-type: none"> • None.
Historic England (19a)	<ul style="list-style-type: none"> • Consultation document deals with matters that are beyond the remit and concern of 	<ul style="list-style-type: none"> • Noted 	<ul style="list-style-type: none"> • None.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	Historic England and consequently, we do not wish to comment on the Parking SPD.		
Lavant Parish Council (51)	<ul style="list-style-type: none"> LPC strongly supports and welcomes SDNPA initiative in proposing a Park wide car Parking Policy. LPC supports approach for managing existing NDP car parking policies. “Closed book” Excel spreadsheet calculator badly fails the common sense test and badly serves reputation of the Park Authority. Exactly what does 3.2 car park spaces or 9.6 look like? We object to what has been presented in the form of the Excel spreadsheet as simply not fit for purpose. We do not understand the outputs in either quantity per type of house or in meaningless fractions. Output comes from closed book approach, have no opportunity to understand if policy or code is at fault for floored output. LPC concerned possible to manipulate the number of spaces down by massaging the input. LPC urges SDNPA to continue with the approach but would suggest complete re-think over the proposed Parking Space calculator that from our brief usage produces, to be blunt, stupid answers. 	<ul style="list-style-type: none"> SDNPA welcomes the support for the overall approach taken by the Parking SPD, including continuing use of NDP parking policies as explained in paragraph 2.11. SDNPA understands the concerns about the output from the parking calculator, in the light of providing a suitable number of spaces for a residential development and avoid adding to existing on street parking issues. Further guidance to explain the use of the parking calculator has been added following similar concerns being raised in the first consultation on the SPD. Paragraph 3.1 states that parking provision for residential development will be determined using the two principles (landscape led and sustainable location) in conjunction with output from the parking calculator. Paragraph 5.1 further explains that the parking 	<ul style="list-style-type: none">

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		<p>calculator is a starting point and a guide. Decision makers will need to include all relevant information, of which the calculator output is one part, in determining parking provision for a residential development. There is no intention that the output from the parking calculator is the sole determinant as stated in paragraphs 3.1 and 5.1.</p> <ul style="list-style-type: none"> Where the output from the parking calculator is a fraction, this will be rounded up or down to a whole space as explained in paragraph 5.4. Therefore, in the example, 3.2 is 3 spaces and 9.6 is 10 spaces. 	
Natural England (32a)	<ul style="list-style-type: none"> Whilst we welcome the opportunity to give our views, the topic of the SPD does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. 	<ul style="list-style-type: none"> Noted 	<ul style="list-style-type: none"> None
Peter Wonson (52)	<ul style="list-style-type: none"> No comment as time and effort will be wasted as SDNPA merely carrying out an exercise, will take no notice and therefore pointless. 	<ul style="list-style-type: none"> Sorry you feel this way about responding to the consultation. This Consultation Statement, published on the SDNPA website summarises all 	<ul style="list-style-type: none"> None.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> (Second response following reply from SDNPA) Thank you for response, appreciate the hard work involved but public confidence in SDNP has plummeted to all time low. 	<p>comments received and gives the SDNPA response with changes made to the SPD as appropriate.</p>	
Phil Belden (53)	<ul style="list-style-type: none"> Emphasis on parking will mean failure to address climate crisis and increasing demands on road system in integrated way – narrow and limited action on parking control is best that can be hoped for. Comprehensive Sustainable Access SPD needed to satisfy outcomes in the South Downs Partnership Management Plan SDNPA needs to be much bolder and more challenging in tackling climate change 	<ul style="list-style-type: none"> The SPD provides guidance on parking at new development, giving detail to policy SD22 Parking, of the South Downs Local Plan. In the short to medium term, motor vehicles will continue to be used in a rural area with limitations on public transport. Motor vehicles will need to be accommodated at new development. On-street parking demand, and dangerous and illegal parking are significant issues for local communities in the South Downs that will worsen without guidance on parking. The SPD sets out expected Electric Vehicle charging points provision (in section 4) and significantly improved levels of cycle parking, in accordance with Government guidance, at new development. This is part of enabling the shift to more climate friendly forms of 	<ul style="list-style-type: none"> None.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		transport and meeting the objectives of the Partnership Management Plan.	
Polegate Town Council (54)	<ul style="list-style-type: none"> • Thank you for including Town Council Planning Committee in the consultation process, no comments to make. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Rogate Parish Council (55)	<ul style="list-style-type: none"> • Highlight draft policy T3: Parking in the Rogate and Rake Neighbourhood Plan – new parking to provide sufficient off-street parking. • Clarify Electric Vehicle (EV) charging point provision for public parking. • SPD needs to address parking on verges and congestion of narrow roads around visitor attractions. • On-street parking issues in Rogate, helpful to have meeting between Parish Council, SDNPA and Highways Authority to find a solution. • Could find no reference to Highways Authority and their responsibilities in the SPD. 	<ul style="list-style-type: none"> • Key principle in paragraph 3.2, the SPD requires on-site parking provision to meet the need of the development and avoid adding to existing on street parking issues. • Requiring EV charging points for existing public parking is outside the scope of the SPD, which guides new development. • Parking on verges at existing locations is a matter for the local Highways Authority. • Noted, will pass on request to appropriate colleagues in SDNPA to respond. • NPPF enables local planning authorities to devise local parking standards. The SPD provides National Park standards responding to the landscape led approach of the South Downs Local Plan. When 	<ul style="list-style-type: none"> • None.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		adopted the SPD will replace the existing Highways Authority policies on parking provision at new development.	
Sompting Estate, Mike Tristram (56)	<ul style="list-style-type: none"> • In general, Sompting Estate Trustees support the SPD. Positive to have capacity in the SPD through overarching principles to reach appropriate solutions for parking. • Surprisingly little guidance on holiday lets, glamping and camping, tourist attractions or diversified business interests. • Rural proofing should be considered in the SPD, for example in relation to the local feasibility of EV charging facilities. • Concern that SPD parking provision for non-residential development (section 8, Table 2) could be misapplied to a small-scale camping and glamping development if whole site boundary included in the floor space calculation; guidance needed on 'major application' criterion in paragraph 4.8. 	<ul style="list-style-type: none"> • Welcome overall support and specific highlighting of the overarching principles, designed to provide flexibility in decision-making. • Section 8 covers all forms of new non-residential development. Specific types of development such as new glamping or tourist developments are required to carry out site-specific assessment and section 8 explains what this involves. The approach is case by case rather than being prescriptive for every detailed type of development, to allow flexibility. • The National Park wide context of the Parking SPD means the rural aspect is inherently considered in developing the guidance for parking provision. The two principles of landscape led and sustainable location that are core to the guidance, by 	<ul style="list-style-type: none"> • Rural proofing, further investigation needed. Speak to KS

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		<p>their nature respond to the rural location of the National Park. The provision of EV charging points is dependent on the practical feasibility of connection to the electricity grid and would be assessed in each separate case. The concept of rural proofing and the guidance cited is to be applied to national Government policy rather than the context of a local planning authority.</p> <ul style="list-style-type: none"> • The context for paragraph 4.8 is policy SD22, criteria 4 in the South Downs Local Plan. This refers to new or extended public car parking in or adjacent to settlements listed in policy SD25 Development Strategy. The example of parking serving a camping and glamping development would be covered by the requirement for site-specific assessment in section 8. 	
Stedham with Iping Parish Council (57)	<ul style="list-style-type: none"> • In general, welcome the Parking SPD as recognised seeking to address an issue that is a blight to many rural communities. • Parking Calculator, developers will consider this a required number to achieve consent; 	<ul style="list-style-type: none"> • Welcome the general support for the Parking SPD. • The output from the parking calculator is only one factor in determining residential parking 	<ul style="list-style-type: none"> • None.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<p>Landscape led and Sustainable (Location) need to be clearly defined to avoid confusion around planning decisions; common understanding of quantum is needed.</p> <ul style="list-style-type: none"> • Landscape consideration means if amount of parking not achievable, development oversized and should not be permitted. • Question over reliance on historic Census data. Allow for new development bringing different demographic to an area; would like to understand process used to arrive at Temprow factors, what process to challenge them and frequency they will be reviewed; using historic car ownership data fundamentally flawed. • Agree with garages being treated as third of a space. Suggest this ratio is still too high. 	<p>provision, hence decision makers needing to exercise judgement including all the different factors as explicitly stated in paragraphs 3.1 and 5.1.</p> <ul style="list-style-type: none"> • The quantum of development is the amount. Paragraph 3.5 states if there is an adverse impact on landscape due to parking provision, SDNPA may seek a smaller quantum of development on site. Permission would be refused if parking provision determined to have an unacceptable adverse landscape impact. • As stated, the parking calculator is a guide to levels of future car ownership and is only one factor in determining residential parking provision. Temprow uses different factors including demographic, income and past levels from the Census. Data from Expenditure and Food Surveys and the National Travel Survey is included in the model. The Temprow dataset is amended as required on an infrequent 	

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		<p>basis and the Parking Calculator will be updated at that time.</p> <ul style="list-style-type: none"> • Welcome support for the approach to Garage parking provision. Third of a space reflects evidence from elsewhere. This will be reviewed if new evidence suggests a different number is more suitable. 	
Surrey County Council, Planning (58)	<ul style="list-style-type: none"> • Thank you for consulting Surrey County Council, we have no specific comments to make. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Stuart York, Designing Out Crime Officer, Hampshire Police (15a)	<ul style="list-style-type: none"> • From crime prevention point of view garage is safest place to park a motor vehicle. Consider making garage a parking space if contains charging points for electric vehicles and cycles and cycle anchor points. • Possible to create examples using Parking Calculator where ratio of flats to spaces is 2:1. Ask that SPD state each dwelling must have at least one parking space to reduce levels of inappropriate parking and give opportunity for EV charging. 	<ul style="list-style-type: none"> • For the reasons stated in paragraph 5.6, forms of parking provision, other than garages, are preferred in the SPD. There is no guarantee residents will use garages for parking, even where they contain EV charging points or provide suitable space for bike storage as suggested. • Key principle in paragraph 3.2, the SPD requires on-site parking provision to meet the need of the development and avoid adding to existing on street parking issues. The output from the parking 	<ul style="list-style-type: none"> • None.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		calculator is only one factor in determining residential parking provision, hence decision makers needing to exercise judgement including all the different factors as explicitly stated in paragraphs 3.1 and 5.1.	

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Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document

South Downs Local Plan

April 2021

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I. Introduction

I.1 The purpose of this guidance is to give clear direction to all those involved in the planning decision making process regarding the provision of parking for different types of transportation including cycles, electric bicycles/vehicles and motor vehicles at new development in the South Downs National Park (SDNP). The guidance applies to both residential and non-residential development and, along with some locally specific Neighbourhood Development Plan policies, replaces all previous standards provided by the county councils in the SDNP.

I.2 This guidance is structured as follows:

- National context – National Park legislation and guidance plus the National Planning Policy Framework (NPPF)
- Local context, South Downs Local Plan (SDLP) – approach taken by the Local Plan
- Local context, Neighbourhood Development Plans (NDP) – relationship between this guidance and NDPs
- Principles – outline of the two overarching principles
 - (i) Landscape led principle
 - (ii) Sustainable location principle
- Electric Vehicle charging – guidance on charging points as part of parking provision
- Parking calculator – explanation of the purpose and how to use the parking calculator. The parking calculator for residential development forms Appendix I
- Garages – explanation of how garages will be counted in residential development
- Cycle parking – requirements for residential development and guidance on all aspects of provision
- Disabled Parking - requirements for cycles and vehicles
- Parking for non-residential development - use of the two principles along with table setting out provision for vehicle and cycle parking

I.3 This Supplementary Planning Document (SPD) requires a landscape led approach to parking provision for new development. As explained in the following sections, this approach reflects the purposes and duty of the National Park in the management of development and follows the South Downs Local Plan (SDLP). The guidance when applied to new development should be read within the context of the whole SDLP.

2. Context

National context

2.1 The SDNP is a nationally protected landscape covering an area from Winchester in the west to Eastbourne in the east. This area includes a variety of landscapes including chalk downland, ancient heathland and spectacular coastline with historic market towns and scenic villages.

2.2 The purposes of the South Downs National Park are statutory and take precedence in decision making on development within the National Park. The purposes and duty are set out in the National Parks and Access to the Countryside Act 1949 as amended by the Environment Act 1995. The National Park purposes are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area (purpose 1)
- To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public (purpose 2)

The National Park Authority has a duty when carrying out the purposes: To seek to foster the economic and social well-being of the local communities within the National Park.

2.3 In addition, Section 62 of the Environment Act 1995 also requires all relevant authorities, including those required to act on certain matters by statute and other public bodies, to have regard to these purposes. Section 62 also states that if it appears there is a conflict between the two purposes, greater weight shall be attached to conserving and enhancing the natural beauty, wildlife and cultural heritage of the area (purpose 1).

2.4 The National Planning Policy Framework (NPPF) states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks. The NPPF in section 9 states that transport issues in general must be taken into account in the earliest stages of development proposals. More specifically parking is integral to the design of development and contributes to making high quality places.

2.5 Paragraph 105 of the NPPF sets out the approach to be taken where a planning authority sets out local parking standards for residential and non-residential development. Policies should take into account the following:

- the accessibility of the development;
- the type, mix and use of development;
- the availability of and opportunities for public transport;
- local car ownership levels; and
- the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

Local context - South Downs Local Plan (SDLP)

2.6 The SDLP is landscape led and seeks to deliver multiple ecosystem services. This reflects the purposes of national parks to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and to promote opportunities for the understanding and enjoyment of the special qualities.

- 2.7** This SPD gives guidance on addressing the requirements of Local Plan policy SD22: Parking Provision, criteria 2: “Development proposals will be permitted if they provide an appropriate level of private cycle and vehicle parking to serve the needs of that development in accordance with the relevant adopted parking standards for the locality. Wherever feasible, electric vehicle charging facilities must also be provided.”
- 2.8** The supporting text at paragraph 6.44 reiterates that the level of parking provision needs to be appropriate in accordance with the relevant adopted parking standards for the locality.
- 2.9** It is worth highlighting the relevance of particular Local Plan policies in relation to this SPD aside from SD22. Policies SD4: Landscape Character and SD5: Design are key in outlining the landscape led approach taken in this guidance. Policy SD21 Public Realm, Highway Design and Public Art protects and enhances the public realm and street scene and this space invariably includes vehicle parking. The requirements of policy SD21 criteria 3 and 4 relating to site layout and context are important in relation to parking arrangements. Core policy SD2: Ecosystem Services is also relevant as new parking areas provide an opportunity to contribute to a range of ecosystem services. Paragraph 6.39 of the supporting text to policy SD22 reiterates the expectation that parking areas will contribute to a range of ecosystem services.

Local context - Neighbourhood Development Plans

- 2.10** There are over fifty made or emerging neighbourhood development plans (NDP) in the National Park. Some NDPs have a parking policy that set a local standard for parking provision while others have a more general policy. There is a widespread concern that development will add to existing on street congestion caused by parking in some settlements. NDP policies on parking commonly seek to address this issue by requiring off street parking in new development.
- 2.11** This SPD provides the detail of parking standards for policy SD22 of the SDLP. Where relevant, in decision making, all parking policies in NDPs will be taken into account along with the guidance provided in this SPD. Where there is conflict between different sets of standards then those set out in the last policy document to become part of the development plan will be taken into account.

3. Principles

- 3.1** The overarching principles that form this guidance are ‘landscape led’ and ‘sustainable location’. **In determining parking provision, the two principles should be used in conjunction with, the outputs from the parking calculator for residential development, or Table 2 for non-residential development.** For residential schemes, these two principles will be applied to a development proposal, plus the parking calculator, and together these will form the guidance for determining parking provision. For non-residential schemes, the two principles will be applied along with the parking numbers in table 2 below to determine provision. In decision, making a flexible approach will be taken in using the two principles along with the numbers generated by the parking calculator or

table 2 as appropriate to the scheme. The decision making process for determining parking provision will also include other information such as parking conditions in the local area, availability and frequency of public transport and access to, and opportunity to use, other transport modes. Each principle, including the flexible approach to be taken, is explained further below.

- 3.2** A further key principle is that the provision of all necessary vehicular parking should as far as practicable be on-site to avoid additional on street parking. All applicants will need to demonstrate an understanding of current parking demand in the local area as part of ensuring the scheme will avoid additional on street parking.

(i) Landscape led - principle

- 3.3** The National Park Authority takes a landscape led approach and this is carried forward to the guidance provided in this Parking SPD. Landscape led is a design process, which, at any scale, uses landscape as a framework for evidence of a site and its context, and is used to create a complete understanding of a place, its character and function. Design evolves using this understanding, maximising the site's potential to generate development, which successfully conserves and enhances the natural beauty, wildlife and cultural heritage of the area and creates sustainable and successful places for people. Strategic policies SD4 and SD5 of the Local Plan are particularly relevant in setting out the landscape led approach. Detailed guidance on the landscape led approach is also provided in the Design Guide SPD, which is due to be published for consultation in winter 2020/21.
- 3.4** For determining parking provision for residential development, this SPD uses a parking calculator in addition to applying the two principles. The parking calculator forms Appendix I of this guidance and is further explained in a separate section below at paragraph 5.1. This parking calculator provides a starting point in determining the number of parking spaces that may be suitable for a specific residential development proposal. The results from the parking calculator are a guide and may need to be varied due to the need to put landscape considerations first in determining parking provision.
- 3.5** Concerns about the impact on landscape of parking provision within a proposed residential development is a situation that may require alteration to the intended scheme and flexibility in the application of the number from the parking calculator. For example, in some locations attempting to incorporate the number of spaces suggested by the parking calculator in the proposed scheme could have an unacceptable adverse impact on the landscape. Again, in some locations the option of lower parking provision may be unacceptable as alternative means of travel such as public transport may be very limited. A lower parking provision could also likely result in greater on street parking in adjacent parts of the settlement causing congestion or unacceptable visual impact on the street scene. In this type of situation, SDNPA may seek a smaller quantum of development on the site due to resultant adverse landscape impacts. This in turn would generate a lower level of parking

provision than originally suggested by the parking calculator for the original scheme. Hence, the need for an iterative, landscape led approach at the start of the design process.

3.6 The SDNPA takes this flexible approach to the application of the result from the parking calculator in specific circumstances with landscape considerations justifying the alteration of residential schemes where appropriate. This is to avoid harm to the landscape through visually intrusive parking provision in sensitive locations where the negative impact cannot be overcome through the design and arrangement of the proposed scheme.

3.7 It is expected that development proposals will integrate parking provision as part of the overall landscape led approach. Parking provision is to be considered from the start of working up development proposals and is not to be treated in isolation separate from the rest of the scheme. This approach is consistent with Local Plan policy SD5: Design.

3.8 The following are points that need to be considered when designing a scheme to meet the requirements of SDLP policy SD5. The design should also take into account the guidance in all the Supplementary Planning Documents (SPDs) and Technical Advice Notes (TANs), in particular the forthcoming Design SPD and the Dark Night Skies TAN:

- All parking design to be landscape led with layouts and materials responding to the landscape character of the place.
- All parking provision should be durable, sustainable and adaptable over time to meet the needs of a range of users.
- Car parking should be well integrated and the result must not be a public realm dominated by cars, hard standing and associated clutter.
- Car parking areas and cycle parking should maximise opportunities for enhancing green infrastructure and sustainable drainage. Development layouts and detailed design should minimise the opportunities for anti-social car parking on pavements and green spaces.
- Layouts should avoid the use of “tandem parking” in providing spaces at a development
- All residential parking should be safe, accessible for all and overlooked with good natural surveillance from nearby buildings and the public realm.
- Natural surveillance within and without, should not be obscured by planting within the parking area or at the periphery.
- To facilitate natural surveillance during the hours of darkness the lighting of parking areas should follow all the relevant technical guidance.
- Where appropriate, access/egress to parking areas should be regulated with a single point of entry/exit, and to that end, depending on the site characteristics, enclosed within a robust boundary treatment between 1m and 1.8m high.
- Cycle storage for residents and users of non-residential buildings should be safe and convenient to use, secure and sheltered from the elements with good natural surveillance from the nearby buildings and the public realm. Wherever possible, cycle parking for residential development should be within the curtilage of the dwelling.

- 3.9** In addition, from the beginning of the process the design needs to include consideration of policy SD2 and how the parking areas will contribute to ecosystem services.

(ii) Sustainable location - principle

- 3.10** The National Park Authority supports and encourages more sustainable forms of travel¹ whilst recognising that outside the larger settlements public transport coverage can be poor with a heavy reliance on private vehicles to get around. The five main settlements identified in the SDLP are Petersfield, Lewes, Liss, all of which have a railway station, and Midhurst and Petworth which do not. All five settlements are more sustainable relative to the rest of the National Park in offering a higher level of services and access to public transport options, either bus and/or rail.
- 3.11** In some situations, conditions may exist that allow a flexible approach to applying the number from the parking calculator to a residential development proposal. For example, sustainable locations that have access to public transport options and/or connections to local facilities and amenities using active modes of transport such as cycling and walking. In these locations, it is likely to expect a lower level of parking provision because of the travel options that are easily accessible and offer an alternative to the private vehicle. These more sustainable locations are likely to be in the larger settlements in the National Park. However, there is no assumption made that being located in one of the five settlements, a site will be more sustainable by default. Each site will be assessed on its merit as to the sustainability of the location under this principle.
- 3.12** Whether conditions exist in a location to justify a lower parking provision than suggested by the parking calculator would need to be determined on a case by case basis. The applicant will require robust evidence to justify a lower parking provision, including a parking survey for the local area. This evidence could include a study of existing travel options within the immediate locality of the proposed development. Alternatively, the proposed development may be creating new active travel routes linking to the existing network offering better connectivity and options other than using the private car. In that case, the evidence provided would need to show robustly how the creation of new routes and connectivity justifies a lower parking provision.
- 3.13** Applicants seeking a lower parking provision for a residential scheme are advised to enter into discussions with officers of the SDNPA at the earliest opportunity through the pre-application enquiry process.

4. Electric Vehicle Charging

- 4.1** This section provides guidance for the application of SDLP policy SD22 criteria 2 that states for new developments “Where feasible, electric vehicle charging facilities must also be provided.” This section, and other references to Electric Vehicle (EV) charging in this document, compliment the guidance in the Sustainable Construction SPD on EV charging.

¹ South Downs National Park Authority, Partnership Management Plan, Outcome 5.3 Encouraging Sustainable Transport

The guidance, in this document and the Sustainable Construction SPD, should both be read when determining provision at new development for EV charging.

- 4.2** To clarify the phrase “Where feasible” in policy SD22, criteria 2 and 4. The expectation is that the applicant will provide EV charging in accordance with at least the minimum standards in the guidance. Applicants will be encouraged to exceed these minimum standards wherever possible. Where providing EV charging for parking provision is unfeasible, the onus is on the applicant to justify with robust evidence this is the case, for example, issues connecting to the local electricity network.
- 4.3** For residential development in addition to the guidance in the Sustainable Construction SPD. The expectation is for houses that are detached, semi-detached or end of terrace EV charging will be provided on plot. For mid-terrace houses, the expectation is an EV charging point will be provided as part of an allocated space, within close proximity and having easy access to the dwelling.
- 4.4** The expectation is for flats that an EV charging point will be provided for each parking space serving those dwellings.
- 4.5** For non-residential development, the expectation for EV charging is twofold. Firstly, for developments with at least 10 car spaces there should be at least one EV charge point. The site-specific assessment should consider whether a higher ratio of car parking spaces providing EV charging is suitable for the development. EV charging points to be for rapid charging unless site specific assessment determines a combination with standard charging would be suitable e.g. if there will be all day or overnight parking. Secondly, for major non-residential development² at least one in every five car parking spaces be fitted with ducting infrastructure for EV charging. The site-specific assessment should consider whether all spaces or at least a greater proportion than one in every five spaces, can be fitted with ducting infrastructure. Retrofitting these car parking spaces as future demand for EV charging increases then becomes easier and more economical.
- 4.6** For cycle parking at residential development. For houses, the expectation is that EV charging for e-bikes will be provided as part of the on plot cycle parking spaces. For flats, the expectation is that all cycle parking spaces will be provided with EV charging points for e-bikes.
- 4.7** For cycle parking at non-residential development the expectation is that each cycle parking space will be provided with EV charging points for e-bikes.
- 4.8** For public parking, as referred to in policy SD22 criteria 4. The expectation is that for public parking with at least 10 spaces there should be at least one EV charging point. If the public car park qualifies as major non-residential development, (see footnote 2) in addition ducting infrastructure should be installed for at least one in every five spaces. The EV

² Definition from Sustainable Construction SPD page 5, paragraph 1.24, Major non-residential development includes: All new non-residential development which either provides additional floor space of at least 1000 sqm or is on a development site of at least 0.5ha.

charging will be for rapid charging unless there will be longer stays through the day or overnight parking where an additional provision of standard charging facilities may also be suitable.

5. Residential Parking

Parking calculator

- 5.1** This section explains how the parking calculator is to be used for residential development. The output from the parking calculator is a starting point and a guide for determining parking provision on a residential site. Decision makers will need to exercise judgement in determining parking provision by applying the two principles, landscape led and sustainable location, to the output from the parking calculator. The decision making process will also include other information such as parking conditions in the local area, availability and frequency of public transport and access to, and opportunity to use, other transport modes.
- 5.2** The parking calculator uses car ownership data from the Census and data on future levels of car ownership from a modelling tool to predict site-specific parking demand. Data on the type and tenure of dwellings, and the provision of allocated and unallocated parking at the site are all entered into the parking calculator. Car ownership varies significantly by type and tenure of dwellings and therefore this information is important in determining the level of parking demand at a site. Allocated in relation to car parking means that a space is designated as being for a specific dwelling whether on or off plot. Understanding the amount of allocated parking proposed at a site is important as car ownership varies even for the same type of property. Unallocated parking allows anyone whether resident or visitor to park in the space.
- 5.3** The parking calculator forms Appendix I of this guidance. In practical terms, it is a separate document in the form of an Excel spreadsheet. Further instructions on how it is used can be found in the Excel spreadsheet. Firstly, using the drop down menu enter the ward name. The ward is the primary electoral unit in England and is the geographical area for the Census data, which forms the basis of the parking calculator. If you are unsure which ward and have a postcode for the address, follow the link in the parking calculator to the online look up. Follow the instructions on that website, enter the postcode and the ward details will be provided. The ward can then be entered. The parking calculator uses varying average car ownership figures depending in which ward the proposed development is located. It is critical that the correct ward is entered as average car ownership varies within the National Park and the parking calculator factors in these differences.
- 5.4** The number and tenure³ of each dwelling type needs to be entered in to the parking calculator, for example the numbers of each one-bedroom house, and whether it is owner occupied or other. The parking calculator notes this difference as car ownership data is significantly different for owner occupied compared to other types of tenure. The parking

³ Tenure being defined as the legal basis on which the property will be occupied for example, owner-occupied or rented.

calculator will automatically provide a figure for the number of habitable⁴ rooms. The numbers of allocated parking spaces need to be entered. Once all this information has been entered, the parking calculator will provide a figure for the number of spaces to be provided for each dwelling type along with a total figure for the whole scheme. Figures should be rounded up or down as appropriate to create whole spaces. Figures of 0.5 or greater to be rounded up and less than 0.5 to be rounded down. It should be noted that paragraph 7.38 of the SDLP states that any room in a proposed dwelling that is not a main reception room, kitchen, bathroom or WC, and has dimensions that allow for a single bed, will be counted as a bedroom. This will include studies and additional reception rooms.

- 5.5** When assessing parking provision, consideration should be given to providing a dedicated and marked space or spaces for “car clubs” at residential development.

Garages

- 5.6** Garages are often put to other uses than parking. Research carried out nationally has shown that between 19%-45% of garages are used for other purposes than parking a vehicle. This is reflected in local research. In East Sussex, 33% of garages were used for parking based on surveys carried out in 2011⁵. The research shows that common reasons for using the garage for other purposes were to provide storage; cars were too large to fit the dimensions or conversion to habitable accommodation. Due to garages being frequently used for other purposes, parking at new developments is best provided through driveways, carports or allocated parking bays.
- 5.7** Where garages are provided they will need to meet the minimum dimensions below. Due to research both nationally and locally showing limited usage for parking, garages will be counted as a third of a space. Therefore, every three garages provided will be counted as one parking space towards the overall parking requirement. As a minimum, garages must be 6 metres x 3.3 metres in size. The measurements in this paragraph refer to the Gross Internal Area of the garage.

6. Cycle parking

- 6.1** The Cycling and Walking Plan for England published in July 2020⁶ makes clear the Government’s intention to increase significantly the use of cycles for transport. There are clear benefits from cycling for health and wellbeing and the environment including improving air quality as well as being a more sustainable form of transport within the long term context of climate change. Government strategy includes significantly increasing the use of cycles for shorter journeys currently made by cars. Providing suitable cycle parking provision and facilities is vital in encouraging people to cycle and bring about a shift to other forms of transport than the motor car. In the National Park, cycling contributes to

⁴ Habitable room includes living rooms, kitchens, bedrooms but not bathrooms, WCs, circulation space.

⁵ Guidance for Parking at New Residential Development, October 2017, East Sussex County Council

⁶ Gear change: a bold vision for cycling and walking, Cycling and Walking Plan for England July 2020, Department of Transport.

objectives and outcomes⁷ on climate change, including encouraging sustainable transport, and improving health and wellbeing.

6.2 Table 1 below sets out the recommended levels of cycle parking provision for new residential development. There is further guidance on cycle parking provision in section 8 Non-Residential Development, Table 2 and in section 7 Disabled Parking.

6.3 For all other matters relating to the provision of cycle parking for residential and non-residential development, including security, the type of parking provision, location, layout and access, the guidance in Chapter 11 of Cycle Infrastructure Design⁸ and the forthcoming Design SPD should be followed as appropriate.

Table 1 – Cycle space provision, new residential development

Dwelling Type	Visitors (Short Stay)	Residents (Long Stay)
House	1 space per 5 units ⁹	1 space per bedroom ¹⁰
House	For larger or oversize bicycles, 1 space per 10 units, or if <10 units, 1 space per development.	For larger or oversize bicycles, 1 space per 5 units or, if <5 units, 1 space per development.
Flat	1 space per 5 units	Communal cycle parking: 1 space per bedroom
Flat	For larger or oversize bicycles, 1 space per 10 units, or if <10 units, 1 space per development.	Communal cycle parking: For larger or oversize bicycles, 1 space per 5 units or, if <5 units, 1 space per development.

7. Disabled parking

7.1 This section on disabled parking applies to the guidance on residential and non-residential development. Provision of disabled parking spaces needs to be considered from the start of the design process. As a minimum, disabled parking spaces should be provided at 5% of the overall total of parking spaces for the development.

7.2 The 5% minimum provision for new development applies to parking for cycles. Therefore 5% of the total provision for standard cycles must be for suitable spaces for adapted cycles for disabled people.¹¹ The provision of parking for adapted cycles is wholly for use by the disabled and makes no contribution to the requirements in Table 1 and 2 for larger/oversize bicycle parking.

⁷ South Downs Local Plan objective 6; South Downs Partnership Management Plan outcome 5.3 & 7.1

⁸ Department for Transport, Cycle Infrastructure Design, Local Transport Note 1/20 July 2020 or the latest version if superseded.

⁹ Adapted for small residential sites in the South Downs National Park, from London Plan, page 277 Table 6.3, C3-C4 dwellings (all), Short Stay, 1 space per 40 units

¹⁰ Consistent with suggested minimum standards in Department for Transport, Cycle Infrastructure Design, Local Transport Note 1/20 July 2020, page 134 Table 11-1.

¹¹ Consistent with suggested minimum standards in Department for Transport, Cycle Infrastructure Design, Local Transport Note 1/20 July 2020, page 134 Table 11-1.

- 7.3** For residential schemes, the majority of larger dwellings are likely to have adequate parking on the plot although for developments of flats it may be necessary to include unallocated disabled parking bays. For non-residential schemes, disabled parking is to be part of the overall provision rather than in addition. Where specific developments are likely to create more demand for disabled parking spaces, this should be identified in the application process and detailed in transport assessments or access statements. Disabled parking provision should be designed and located to meet the specific needs of disabled persons. The location of suitable drop off points should also be indicated in transport assessments or access statements to demonstrate how the needs of disabled people have been addressed and to inform planning decisions.

8. Non-Residential Development

- 8.1** Provision for parking for non-residential development is shown in table 2 for vehicles and cycles. Table 2 must be used in conjunction with the principles in this guidance of i) landscape led and ii) sustainable location as described above to determine an appropriate level of parking provision. The numbers in the table can be applied flexibly where it is appropriate for reasons of landscape or sustainability in the same manner as described for residential development.
- 8.2** The NPPF is clear that where local planning authorities are setting parking standards the local circumstances must be taken into account. The numbers in Table 2 provide initial guidance to developers for suitable parking provision at a specific site depending on the type of development. Developers will need to carry out a site-specific assessment of parking for the proposed development. The assessment will include an understanding of existing parking demand in the local area of the site.
- 8.3** The site-specific assessment must consider all types of transport covered by this guidance that is cycles of all sizes, electric bikes/vehicles, motor vehicles and cycles/vehicles for the disabled. Depending on the land use different types of transport should be covered in the assessment, for example taxi parking where appropriate or last mile delivery for retailers or food outlets.
- 8.4** For some sites, provision for parking may be meeting the needs of multiple land uses. For example, this is the case for some of the visitor attractions within the National Park. In these type of developments, involving multiple land uses, the site specific assessment should, on a case by case basis, apply a flexible use of the standards for more than one of the types in Table 2 as appropriate. The applicant will need to demonstrate that the proposed solution meets the parking needs of the multiple land use development.
- 8.5** In general, for site specific assessment, the following characteristics are also to be taken into account: survey or business data to ascertain the peak parking periods and demand; the location of the site as well as accessibility for travel via alternatives to the private car; local information such as Census travel to work data about mode share and detail in supporting travel plans.

- 8.6** The amount of parking provision for commercial vehicles will vary greatly from site to site depending on land use. The assessment will need to consider the land use of the proposed development, trip rates associated with the development (including base and forecast mode share) and the user groups of staff/visitors to the site (including shift patterns).
- 8.7** The number of spaces for LGV/HGVs may also be derived using a similar methodology or compared to vehicle operating licences for similar buildings/operations.
- 8.8** It is the responsibility of the developer to prove that adequate facilities are provided on site for the proposed use, including cycle parking, changing and storage facilities. This may include providing details of the proposed operation of the site once in use such as whether the site will need to store vehicles not in use or on layover periods, the frequency of vehicles visiting the site for deliveries, or the type and size of vehicles using the site.
- 8.9** It should be considered that the staff and visitor ratio of each land use is likely to be distinct to their appropriate class and may change over the life of the building, particularly when occupied by another business. Some uses such as health centres will need to meet parking needs from both staff and visitors, whilst industrial premises will generally only be accessed by staff with occasional visitors.
- 8.10** It also needs to be considered that all buildings and land are permitted to change without the need for planning permission within their use class. For example, offices can change to crèches and health services can change to shops within Class E (commercial, business and service). No planning permission is required for these changes of use within a use class and therefore the distinct parking standards for these different uses in Table 2 below cannot be applied in those specific cases.
- 8.11** Where reference is made in Table 2 below to Travel Plans these should set out the minimum level of provision for staff (long term parking) and visitor/customers (short term) cycle parking spaces.
- 8.12** The measurements in Table 2 below refer to the Gross Internal Area of the building.

Table 2 – Parking provision for non-residential development

Use Class	Vehicle	Cycle
B2 General Industrial	1 space per 40m ²	1 space per 200m ² for staff and 1 space per 500m ² for visitors For larger and oversize bikes, 1 space per 1,000m ² for staff and 1 space for customers per development.
B8 Storage & Distribution	1 space per 100m ²	1 space per 500m ² for staff and 1 space per 1000m ² for visitors For larger and oversize bikes, 1 space for staff and 1 space for customers per development.
C1 Hotels	1 space per bedroom	1 cycle space per bedroom For larger and oversize bikes, minimum 1 space plus 1 space for every 10 bedrooms.
C2 Residential Care Homes	Site-specific assessment based on travel plans and specific operational needs	Site-specific assessment based on travel plans and specific operational needs
E Commercial, Business and Services – shops and retail	1 space per 14m ²	1 space per 100m ² for staff and 1 space per 100m ² for customers For larger and oversize bikes, 1 space for staff and 1 space for customers per development.
E Commercial, Business and Services – Financial and Professional Services	1 space per 30m ²	1 space per 100m ² for staff and 1 space per 200m ² for customers For larger and oversize bikes, 1 space for staff and 1 space for customers per development.
E Commercial, Business and Services – food and drink (mainly on premises) e.g. restaurants and cafes	1 space per 5m ² of public area and 2 spaces per bar (or 5m length of bar for large bars) and for staff parking to be clearly designated	1 space per 4 staff and 1 space per 25m ² for customers For larger and oversize bikes, 1 space for staff and 2 spaces for customers per development.
E Commercial, Business and Service – Business (office, research and development and light industrial process)	1 space per 30m ²	1 space per 150m ² for staff and 1 space per 500m ² for visitors For larger and oversize bikes, 1 space per 1,000m ²

		for staff and 1 space for customers per development.
E Commercial, Business and Service – Non-residential institutions (medical or health services, crèches, day nurseries and centres)	Site specific assessment based on travel plan and needs	Site specific assessment based on travel plan and needs
E Commercial, Business and Service – Assembly and Leisure (indoor sport, recreation or fitness, gyms)	1 space per 22m ² . For large scale places of assembly serving more than a local catchment, 1 space per 15m ² .	1 space per 4 staff plus 1 per 50m ² or 1 per 30 seats/capacity for visitor/customer For larger and oversize bikes, 1 space for staff and 1 space for customers per 250m ²
F.1 Non-residential institutions (education, art gallery, museum, public library, public exhibition hall, places of worship, law courts)	Site specific assessment based on travel plan and needs	Site specific assessment based on travel plan and needs
F.2 Shop no larger than 280m ² (selling mostly essential goods and at least 1km from another similar shop); community hall, outdoor sport/recreation area, indoor or outdoor swimming pool, skating rink	1 space per 14m ²	1 space per 100m ² for staff and 1 space per 100m ² for customers For larger and oversize bikes, 1 space for staff and 1 space for customers per 250m ² .
Sui Generis, Public House, wine bar, drinking establishment	1 space per 5m ² of public area and 2 spaces per bar (or 5m length of bar for large bars) and for staff parking to be clearly designated	1 space per 4 staff and 1 space per 25m ² for customers For larger and oversize bikes, 1 space for staff and 2 spaces for customers per development.
Sui Generis, Hot Food Takeaway	1 space per 5m ² of public area and 2 spaces per bar (or 5m length of bar for large bars) and for staff parking to be clearly designated	1 space per 4 staff and 1 space per 25m ² for customers For larger and oversize bikes, 1 space for staff and 2 spaces for customers per development.
Sui Generis, Cinema, Concert Hall, Bingo Hall, Dance Hall, Live music venue	1 space per 22m ² . For large scale places of assembly serving more than a local catchment, 1 space per 15m ² .	1 space per 4 staff plus 1 per 50m ² or 1 per 30 seats/capacity for visitor/customer For larger and oversize bikes, 1 space for staff and 1 space for customers per 250m ²

9. Parking Capacity Surveys

- 9.1** For both residential and non-residential schemes, advice should be sought from the local highways authority at the earliest stage of the development process as to whether a parking capacity survey is appropriate. The extent and form of the survey is to be agreed with the local highways authority and in liaison with the South Downs National Park Authority. Where parking provision is to be determined by a site-specific assessment the expectation is a parking capacity survey will be carried out. For parking surveys, the recommended approach is to follow the “Lambeth Methodology¹²”.
- 9.2** The geographical area which should be surveyed (survey area) should be proportionate to the impact of the development – determined as the number of vehicles that are expected to park on street in the surrounding area. The survey area should include sufficient available space to accommodate the number of vehicles expected to be owned by residents of the site and their visitors. This can be determined using the Parking Calculator.
- 9.3** The survey area is expected to centre on the development site and should include the area’s most likely to be used for parking by those living in, or visiting the site, and will therefore need to have regard for site access arrangements.
- 9.4** Surveys should be carried out when usage of available parking space is at its greatest (i.e. peak time) in the survey area. This may include early morning surveys to assess the amount of overnight parking in the area. The duration of the survey will be dependent on the likely impact of the development and whether or not there are existing pressures on parking space in the area. A development which is likely to have a large impact on on-street parking in an area where available space is already well used or insufficient to meet existing demands, would be expected to carry out an extensive survey throughout the day.
- 9.5** A parking capacity survey should take the form of a beat survey (or similar alternative) where an enumerator walks a planned route at regular intervals recording registration plate details of the parked vehicles. The enumerator should record sufficient information to provide the following information in a summary report:
- The rate of turnover of vehicles on each street expressed as a number of vehicles leaving/arriving per hour
 - The number of vehicles parked on each street
 - An estimate of the parking capacity of each street and a brief explanation of how this was calculated

¹² Recognised method for carrying out parking surveys devised by the London Borough of Lambeth: <https://www.lambeth.gov.uk/sites/default/files/pl-PARKING SURVEY GUIDANCE NOTE Nov 2012 Update.pdf>

9.6 If the development is located within a Controlled Parking Zone, the summary report should also provide details of the existing resident permit take-up and/or any waiting lists. This information can be obtained from the local highway authority. A summary report of parking capacity surveys should be accompanied by:

- A map displaying the geographical area surveyed at a suitable scale for interpretation
- Details of the dates and times of day when survey(s) were undertaken
- Details of parking restrictions (Traffic Regulation Orders) which apply in the survey area.

10. Public Parking

10.1 Policy SD22 and the supporting text in the SDLP provide guidance for the development of new, extended or relocated public parking. The principles of landscape led and sustainable location in this guidance are consistent with, and can be applied to, the policy requirements for public parking in SD22. Similarly, to the guidance in this SPD a successful scheme will use an iterative landscape led process to make a positive contribution to the overall character and appearance of the area whilst improving safety, and being inclusive and accessible for all users.

11. Parking Space Dimensions

11.1 For car parking, a space should have the minimum dimensions as set out below.

Table 3 – Types of car parking space – minimum dimensions

Type of parking space	Minimum dimensions
Standard parking space	5m x 2.5m (A minimum additional 0.5m will need to be added to either or both dimensions where the space is adjacent to a wall(s) or fence(s). Spaces in front of garages must be a minimum of 6m long to maintain access to the garage)
Disabled Parking Space	5m x 3.6m
Car Ports	5m x 2.8m

For cycles, the dimensions for different parking types should follow the guidance in Chapter 11 of Cycle Infrastructure Design¹³ or, when updated, the latest version of that document. Any space that fails to meet the dimensions above for cars, or for cycles, the guidance in Chapter 11 of Cycle Infrastructure Design (or, when updated, the latest version of that document), will be excluded from the calculation of the overall parking provision.

¹³ Cycle Infrastructure Design, Local Transport Note 1/20, July 2020, Department for Transport

Appendix I Parking Calculator

PLEASE SEE SEPARATE PARKING CALCULATOR EXCEL SPREADSHEET DOCUMENT

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SOUTH DOWNS NATIONAL PARK AUTHORITY CAR OWNERSHIP PARKING DEMAND TOOL												
Ward 1						STAGE 1	Please input the ward name for your development location by double clicking in the box or click box and use the drop down menu to the right of the box. The spreadsheet will automatically show the District and Ward of this location. If the ward is not known please refer to https://www.nomisweb.co.uk/reports/lmp/ward2011/contents.aspx and input postcode. Where Census data contains small samples for certain sized dwellings this is highlighted in red if <20, and green if <50 in the Total Demand column. In such cases, other wards should be selected to achieve a higher sample size, the tool allows for 3 wards. If there is still a low sample then the tool will automatically choose district/borough data.					
District												
Ward 2												
District												
Ward 3												
District												
Ward Tempro Factor 2011-2033												
District Tempro Factor 2011-2033												
STAGE 2												
Please input the unit type, tenure, number of bedrooms, number of units of that type and number of allocated parking spaces												
DEVELOPMENT MIX						ALLOCATED PARKING	PARKING DEMAND					
Ref.	Unit Type	Tenure	Habitable Rooms (Per Unit)	Bedrooms (Per Unit)	No. of Units (Total)	Spaces (Per Unit)	Allocated No.	Unallocated for Residents		Unallocated for Visitors		Total Demand
								per unit	Total	per unit	Total	
A												
B												
C												
D												
E												
F												
G												
H												
I												
J												
K												
L												
M												
N												
O												
P												
Q												
R												
S												
Total												



South Downs
National Park Authority

GUIDANCE NOTE

The Parking Demand Tool should be used in reference to South Downs National Park Authority Residential Parking Policy Guidance. The tool uses Census 2011 Car Ownership and Temprom growth to 2033 to predict residential development parking demand. The tool is not a definitive standard but a guide to the expected level of car ownership. For more information please refer to the guidance document or contact planningpolicy@southdowns.gov.uk

Spreadsheet tool developed by:



www.pelhamtransportconsulting.co.uk

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Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document (SPD)

**Strategic Environmental Assessment (SEA) –
Screening Statement**

**Habitats Regulations Assessment (HRA) –
Screening Statement**

Determination Statement

I. INTRODUCTION

- I.1** This statement sets out the Authority's determination under Regulation 9 (1) of the Environmental Assessment of Plans and Programmes Regulations 2004 on whether or not a Strategic Environmental Assessment is required for the consultation draft Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document (SPD) hereafter referred to as the Parking SPD.
- I.2** This statement also sets out the Authority's determination as to whether Appropriate Assessment is required under the Conservation of Habitats & Species Regulations 2017 (as amended).

Strategic Environmental Assessment

- I.3** Under the requirements of the European Union Directive 2001/42/EC (Strategic Environmental Assessment (SEA) Directive) and Environmental Assessment of Plans and Programmes Regulations (2004) specific types of plans that set out the framework for future development consent of projects must be subject to an environmental assessment.
- I.4** There are exceptions to this requirement for plans that determine the use of a small area at a local level and for minor modifications if it has been determined that the plan is unlikely to have significant environmental effects.
- I.5** In accordance with the provisions of the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations (2004) (Regulation 9(1)), the Authority must determine if a plan requires an environmental assessment. Where the Authority determines that SEA is not required then under Regulation 9(3) the Authority must prepare a statement setting out the reasons for this determination. The need for SEA is considered under Section 3 of this report.

Sustainability Appraisal

- I.6** Under separate legislation (the Planning and Compulsory Purchase Act 2004 and associated Regulations), the Authority is required to carry out a Sustainability Appraisal (SA) for all Development Plan Documents. This considers the social and economic impacts of a plan as well as the environmental impacts.
- I.7** In accordance with current Regulations (Town & Country Planning (Local Development) (England) (Amendment) Regulations 2012) SA is not required to be carried out for SPD. However, despite this, it is still necessary to determine the need for SEA.

Habitats Regulations Assessment

- I.8** Habitats Regulations Assessment is required to determine whether a plan or project would have significant adverse effects upon the integrity of internationally designated sites of nature conservation importance, or Natura 2000 sites. The need for HRA is set out within the EC Habitats Directive 92/43/EC and transposed into British Law by the Conservation of Habitats and Species Regulations 2017 (as amended). Section 4 of this report deals with the need for Habitats Regulation Assessment.

2. SCOPE OF THE PARKING SPD

2.1 The scope of the SPD is to provide further guidance to support the implementation of the parking policy of the South Downs Local Plan (SDLP). The SPD will elaborate upon policy SD22: Parking Provision of the SDLP (adopted July 2019) and applies to the whole of the South Downs National Park. The SPD provides further detail on the following matters:

- Sets out guidance for determining parking provision for residential development using two principles in conjunction with a calculator tool and including all relevant information in the decision making process;
- Sets out guidance for determining parking provision for non-residential development using two principles in conjunction with a table showing provision of spaces by type of development and including all relevant information in the decision making process;
- Provides examples of how the two principles will be used to determine parking provision;
- Explains how the calculator tool is used as part of the process for determining parking provision at residential development;
- Provides guidance for Disability Parking;
- Provides guidance for provision of cycle parking at new development;
- Provides guidance on conducting Parking Surveys;
- Sets out minimum standards for types of parking space.

3. STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

The SEA Screening Process

- 3.1** The process for determining whether or not an SEA is required is called screening. In order to screen, it is necessary to determine if a plan will have significant environmental effects using the criteria set out in Annex II of the Directive and Schedule I of the Regulations. Table I sets out the Authority's screening for the Parking SPD using the criteria set out in Annex II of the Directive and Schedule I of the Regulations. A determination cannot be made until the three statutory consultation bodies have been consulted: The Environment Agency, Natural England and Historic England.
- 3.2** Within 28 days of making its determination the authority must publish a statement such as this one, setting out its decision. If it determines that an SEA is not required, the statement must include the reasons for this.

SEA Determination and Reasons for Determination

- 3.3** Before making a determination, the three statutory bodies were consulted. The responses received are set out in Table I below:

Table I – Comments received by Consultation bodies

Consultation Body	Comments
Environment Agency Response received 16 November 2020	Thank you for consulting the Environment Agency on the Parking SPD for the South Downs National Park Authority. I can confirm that we have no comments to make. I can also confirm that we do not believe that the SPD is likely to give rise to significant environmental effects and as such would not require an SEA in relation to the issues in our remit.
Historic England Response received 18 November 2020	Further to your email below, I am writing to confirm that Historic England does not wish to comment on the Parking Supplementary Planning Document which deals with matters largely beyond the remit of Historic England.
Natural England Response received 4 November 2020	Thank you for your consultation request on the above dated and received by Natural England on 28th September 2020. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural

	<p>environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p>Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.</p> <p>As the SPD is about a car parking charging strategy for the National Park, it is unlikely there will be significant impacts to designated sites from the SPD.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p>
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SEA Determination and Reasons for Determination

Table 2 – SEA Screening for the Parking SPD

Criteria (from Annex II) of the SEA Directive and Schedule I of the Regulations	SDNPA Comments
Characteristics of the plan or programme	
a) The degree to which the plan or programme sets a framework for projects and other activities, either with regards to the location, nature, size and operating conditions or by allocating resources.	The Parking SPD sits at the lowest tier of the development plan system. It offers specific guidance to implement policy SD22: Parking Provision of the South Downs Local Plan (SDLP).

b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	The SPD is an implementation tool for delivering the already adopted development plan policies at a higher tier (the SDLP) which have already been subject to SA/SEA. It is influenced by other higher tier plans rather than influencing other plans itself.
c) The relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development.	The SPD provides further guidance to support the implementation of the parking policy in the context of the other policies of the adopted SDLP which have already been subject to SA/SEA and therefore does not have a significant environmental impact on environmental considerations. As the SPD is an implementation tool for the SDLP parking policy it does have social economic and environmental considerations in respect to sustainable development by providing clear and consistent guidance on the provision of parking within new development.
d) Environmental problems relevant to the plan or programme.	The SPD is an implementation tool for delivering already adopted development plan policies at a higher tier which have already been subject to SA/SEA. The SPD expands on higher level policy requirements (SD22) that parking for vehicles and cycles is appropriately provided within new development to minimise landscape impact and maximise ecosystem services.
e) The relevance of the plan or programme for the implementation of Community (EU) legislation on the environment (for example plans and programmes linked to waste management or water protection).	The nature of the Parking SPD has no direct impact on the implementation of Community legislation. The principle of development is considered through the SDLP which has been subject to SA/SEA and HRA.
Characteristics of the effects and of the area likely to be affected	
a) The probability, duration, frequency and reversibility of the effects.	<p>The SPD will not in itself set out or bring forward development plans or projects. It sets out guidance for parking in accordance with policy SD22 of the SDLP and how the Authority will interpret the policy.</p> <p>The SPD should provide positive effects in regards to social, economic and environmental considerations.</p>

b) The cumulative nature of the effects	The SPD is not anticipated to have any significant cumulative effects. Cumulative effects are addressed in the SDLP SA/SEA and HRA.
c) The transboundary nature of the effects	The SPD applies within the South Downs National Park area only. It is not expected to have any negative effects outside of the SDNP. Transboundary effects have been addressed in the SDLP SA/SEA and HRA.
d) The risks to human health or the environment (for example, due to accidents)	The SPD presents no direct risks to human health or the environment. It is considered there may be improvements to human health and environment due to parking being provided to meet local needs, including being of the appropriate location, scale and design. This could indirectly support improved health outcomes and reduced health inequalities
e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The SPD will cover the whole of the South Downs National Park area.
f) The value and vulnerability of the area likely to be affected due to: i) Special natural characteristics or cultural heritage; ii) Exceeding environmental quality standards or limit values; ii) Intensive land-use	The South Downs National Park covers an area with a wide variety of characteristics. The SPD itself does not direct or establish the principle of development. This is covered by higher tier policies in the SDLP which have been subject to SA/SEA. In any case, development proposals will need to be consistent with SDLP policies SD4 to SD18 and where appropriate tested through the Habitats Regulations.
g) The effects on areas or landscapes which have recognised national, community or international protection status.	<p>The SPD will cover the whole of the South Downs National Park which has been designated for its special landscape, wildlife and cultural value. The SPD should provide positive effects by guiding the provision of appropriate levels of vehicle and cycle parking in the National Park.</p> <p>In line with SDLP policies SD4 to SD18, development proposals will need to be tested through the Habitats Regulations where appropriate.</p>

Other Considerations

2.1 In reviewing these criteria and coming to a conclusion, the Authority has also had regard to the following:

- The SPD does not present new policies but seeks to clarify the Authority's approach to implementing the SDLP parking policy.

SEA Conclusion

2.2 Having regard to the considerations above, the Authority considers that the Parking SPD is unlikely to have any significant environmental effects and therefore does not require a Strategic Environmental Assessment.

2.3 This determination was made on 31 March 2021.

4. HABITATS REGULATIONS ASSESSMENT SCREENING STATEMENT

- 2.4** This part of the report seeks to determine whether the Authority's policies and proposals set out in the Parking SPD will have any significant impacts on Natura 2000 sites.
- 2.5** This SPD will support policy SD22: Parking Provision in the adopted South Downs Local Plan (SDLP). The SDLP was subject to a Habitats Regulation Assessment which was prepared in consultation with Natural England. The purpose of HRA is to assess the impacts of plans and/or projects against the conservation objectives of a European protected site. The assessment must determine whether the plan and/ or project would adversely affect the integrity of the site in terms of its conservation objectives. Where adverse effects are identified these effects should be avoided or mitigated.
- 2.6** The Appropriate Assessment stage of HRA is only required should the preliminary screening assessment not be able to rule out likely significant effects.
- 2.7** The Directive states that any plan or project not connected to or necessary for a sites management, but likely to have significant effect thereon shall be subject to appropriate assessment. There are 4 distinct stages in HRA namely:
- Step 1: Screening - Identification of likely impacts on a European site either alone or in combination with other plans/projects and consideration of whether these are significant.
 - Step 2: Appropriate Assessment - consideration of the impact on the integrity of the European Site whether alone or in combination with other plans or projects with respect to the sites structure, function and conservation objectives. Where there are significant effects, step 2 should consider potential mitigation measures.
 - Step 3: Assessment of Alternative Solutions - Assessing alternative ways of achieving the objectives of the plan/project which avoid impacts; and
 - Step 4: Assessment of Compensatory Measures - Identification of compensatory measures should impact not be avoided and no alternative solutions exist and an assessment of imperative reasons of overriding public interest (IROPI) deems that a project should proceed.
- 2.8** Should screening (step 1) reveal that significant effects are likely or effect cannot be discounted because of uncertainty, then it is necessary to move onto step 2: Appropriate Assessment. If step 2 cannot rule out significant effect even with mitigation, then the process moves onto step 3 and finally step 4 if no alternative solutions arise.

Step 1 - Screening

- 2.9** There are four stages to consider in a screening exercise:
- Stage 1: Determining whether the plan/project is directly connected with or necessary to the management of the site;

- Stage 2: Describing the plan/project and description of other plan/projects that have the potential for in-combination impacts;
- Stage 3: Identifying potential effects on the European site(s); and
- Stage 4: Assessing the significance of any effects

Stage 1

- 2.10** It can be determined that the Parking SPD is not directly connected with, or necessary to the management of a site.

Stage 2 to 4

- 2.11** Information about the scope of the SPD can be found in Section 2 of this document. The SPD supports SDLP policies, which are already subject to a full HRA, including of any in-combination effects with other plans and / or projects. The SDLP HRA considered the potential effects on the following European sites:

- Calcareous grassland sites: Lewes Downs SAC, Castle Hill SAC and Butser Hill SAC
- Woodland sites: Duncton to Bignor Escarpment SAC, Kingley Vale SAC, East Hampshire Hangers SAC and Rook Cliff SAC
- Heathland bog sites: Thursley, Ash, Pirbright and Chobham SAC, Woolmer Forest SAC, Ashdown Forest and Shortheath Common SAC
- Bat sites: The Mens SAC, Singleton and Cocking Tunnels SAC, and Ebernoe Common SAC
- Heathland bird sites: Wealden Heaths Phase II SPA, Ashdown Forest SPA and Woolmer Forest SAC
- Riverine sites: River Itchen SAC, Arun Valley SAC/SPA/Ramsar
- Estuarine sites: Chichester and Langstone Harbours SPA / Ramsar, Solent Maritime SAC, Dorset and Solent potential SPA
- Wetland sites: Pevensey Levels SAC/ Ramsar site

- 2.12** The following impact pathways were identified as relevant to the SDLP HRA:

- Recreation pressure
- Air Quality
- Water quantity and changes in hydrological cycles
- Water quality
- Loss of supporting habitat
- Urbanisation

- 2.13** The SDLP HRA undertook a test of likely significant effects for policies and site allocations contained in the Local Plan. Policies / allocations assessed as having no potential impact pathways linking to European Designated Sites were screened out from further consideration. The following assessment was made of SDLP policy SD22:

Policy	Description	HRA Implications
	SD22 sets out the requirements for new public and private parking. The policy permits development proposals where they provide an appropriate level of parking to serve the needs of the development in accordance with the relevant adopted parking standards for the locality.	<p>“No HRA implications.</p> <p>This is a development management policy relating to parking provision. It is a positive policy as it provides for connections to allow vehicle charging, thus encouraging the use of electric vehicles which has the potential to reduce atmospheric pollution contributions.</p> <p>There are no linking impact pathways present.”</p>

HRA screening conclusion

2.14 The Parking SPD provides further guidance to support the implementation of Policy SD22. The SPD does not set the principle of development nor does it direct development to a specific location. Therefore, as with the assessment of Policy SD22 there are no linking impact pathways present and there are no HRA implications. A full appropriate assessment is not required.

2.15 This determination was made on 31 March 2021.