



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

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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 Draft Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document (SPD) (hereafter referred to as the Parking SPD).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 I**. Officer comments relating to the responses received and how the SPD has been amended in response to these is set out in Appendix I.

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"> <li>• Agree with requirements for cycle parking and non-residential development.</li> <li>• 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.</li> <li>• 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?</li> <li>• Suggest data inputted in columns C-G should give answers for all remaining columns (without need to input number of allocated spaces).</li> <li>• Decimal points for calculator results - guidance as to whether to round up or down.</li> <li>• Provide standards and detail for EV charging, Arun DC have prepared SPD with this included - <a href="#"><u>Link to Arun District Council SPD</u></a></li> </ul>	<ul style="list-style-type: none"> <li>• Welcome support on cycle parking and non-residential development.</li> <li>• Propose following changes in response to comments raised: More explanation on how parking calculator works.</li> </ul> <p style="margin-left: 40px;">Clarify the input of "allocated" spaces and explain what this term means.</p> <p style="margin-left: 40px;">Also, explain about rounding up/down the figures.</p> <p style="margin-left: 40px;">Guidance to be included on EV charging points.</p>	<ul style="list-style-type: none"> <li>• Add further explanation on how the parking calculator works with added paragraphs 5.1 and 5.2.</li> <li>• Add wording to explain allocated spaces in new paragraph 5.2.</li> <li>• Rounding up/down of figures to be clarified, in new paragraph 5.4.</li> <li>• Guidance on EV charging to be added in new section 4.</li> </ul>
Bramber Parish Council (02)	<ul style="list-style-type: none"> <li>• Broad support for Parking SPD</li> </ul>	<ul style="list-style-type: none"> <li>• Welcome broad support for Parking SPD.</li> </ul>	<ul style="list-style-type: none"> <li>• New Cycling section to be added (new section 6); Cycle parking standards to be</li> </ul>

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> <li>Concern that parking calculator provides insufficient motor vehicle spaces leading to excessive use of highway for parking.</li> <li>Inadequate numbers of required cycle spaces (Table 1)</li> <li>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.”</li> <li>SPD should specify minimum dimensions for cycle parking and access points using guidance similar to London Cycle Design Standards</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> <li>Cycle spaces for residential and non-residential will be reviewed in light of recent Government guidance.</li> <li>Agree further detail required on EV charging.</li> <li>Minimum dimensions included for garages. Include for other types of cycle parking/storage.</li> </ul>	<p>reviewed and new figures to be provided in revised Tables 1 &amp; 2 and new section 7 Disabled Parking.</p> <ul style="list-style-type: none"> <li>Guidance on EV charging to be added in new section 4.</li> <li>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.</li> </ul>
Bramshott and Liphook Parish Council (03)	<ul style="list-style-type: none"> <li>Document does not take into account commuter traffic and parking provision for commuters.</li> <li>Parking calculator output has criteria applied that are subjective and therefore an inefficient process.</li> <li>Consultation needs to realistically consider the economic future of settlements and availability of parking.</li> </ul>	<ul style="list-style-type: none"> <li>The guidance covers parking provision at new non-residential developments where staff commute to that location by car.</li> <li>The Parking Calculator is to be used with the two principles to allow for flexibility in decision-making.</li> <li>Public car parking in settlements in general, whether for</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		<p>commuters or visitors, is a matter for the local highways authority and the district/borough council.</p>	
Buriton Parish Council (04)	<ul style="list-style-type: none"> <li>• General support for the SPD.</li> <li>• Support assumption that garages not often used for parking and therefore only count as third of parking space.</li> <li>• 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.</li> <li>• 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.</li> <li>• Ensure adequate visitor parking.</li> </ul>	<ul style="list-style-type: none"> <li>• Welcome support for general principles.</li> <li>• Cycle spaces for residential and non-residential will be reviewed in light of recent Government guidance.</li> <li>• 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.</li> <li>• Avoiding on street parking is key part of the guidance and this can be made more explicit.</li> <li>• 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).</li> </ul>	<ul style="list-style-type: none"> <li>• 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 &amp; 2 and new section 7 Disabled Parking.</li> <li>• Principle of parking provision on site to avoid additional on street parking, made explicit through adding wording to new paragraph 3.2.</li> </ul>
Cycle Lewes (05)	<ul style="list-style-type: none"> <li>• Primary purpose of SPD needs to be to ensure provision is made for change from motor vehicles to other forms of transport.</li> </ul>	<ul style="list-style-type: none"> <li>• Support the shift to forms of transport other than the private car. However, the SPD</li> </ul>	<ul style="list-style-type: none"> <li>• Guidance on EV charging to be added in new section 4.</li> </ul>

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"> <li>Facilities for parking to reflect rule H1 of The Highway Code and the hierarchy of road users.</li> <li>Standard for pedestrian access, reflecting natural desire lines, including gradients, width of pathways.</li> <li>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.</li> <li>Non-residential development need for secure cycle facilities</li> <li>Touring cyclists and green tourism demand, towns and villages to have well located secure facilities including lockable cycle storage units.</li> </ul>	<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"> <li>Agree further detail required on EV charging.</li> <li>Cycle spaces for residential and non-residential will be reviewed in light of recent Government guidance.</li> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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 &amp; 2 and new section 7 Disabled Parking.</li> <li>Dimensions for cycle parking in new section 11 Parking Space Dimensions cross reference Cycle Infrastructure Design, Local Transport Note LTN 1/20 July 2020.</li> </ul>
Cycling UK Local Representative Brighton and Hove (06)	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Use of words cycle and vehicle in the SPD is sufficiently clear.</li> <li>Check whether different types of motor vehicles are adequately provided for in the non-residential section.</li> </ul>	<ul style="list-style-type: none"> <li>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</li> </ul>

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> <li>• Vehicles also includes different types e.g. vans, lorries and unsure this has been factored into the SPD.</li> <li>• SPD to give attention to different types of cycles in space provisions.</li> <li>• No reference to Local Cycling and Walking Infrastructure Plans (LCWIP).</li> <li>• Have more ambition in setting higher standards for cycle parking above current demand and restrain high demand for car parking.</li> <li>• Presumption in favour of less car parking rather than need for “robust” case in paras 3.10/11.</li> <li>• 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.</li> <li>• Parking Calculator predicts and provides for cars rather reduce their use.</li> <li>• There is no equivalent calculator for cycles.</li> <li>• Counting of three garages as one space is too generous.</li> <li>• Improve clarity on cycle provision requirements including detail on inside/outside storage, visitor spaces.</li> <li>• No technical guidance on type or dimensions of cycle parking provision.</li> </ul>	<ul style="list-style-type: none"> <li>• Cycle spaces for residential and non-residential will be reviewed in light of recent Government guidance.</li> <li>• Any opportunity for the development to assist in achieving LCWIP objectives would be assessed at application stage.</li> <li>• 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.</li> <li>• 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.</li> <li>• Agree more detail needed on cycle parking type and dimensions.</li> </ul>	<p>vehicles are included in the site-specific assessment.</p> <ul style="list-style-type: none"> <li>• Add wording to new Cycle parking section at paragraph 6.1 to reference the Cycling and Walking Plan for England, July 2020.</li> <li>• 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.</li> <li>• 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 &amp; 2 and new section 7 Disabled Parking.</li> <li>• Emphasis on benefits of cycling altered through wording in new Cycling section, paragraph 6.1.</li> <li>• Guidance on EV charging to be added in new section 4.</li> </ul>



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	<ul style="list-style-type: none"> <li>• Be clearer on distinction between cycle parking and storage, in particular paras 4.5/6 and Table 1.</li> <li>• 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.</li> <li>• SPD should more strongly state benefits of cycling, e.g. for health and the environment.</li> <li>• Disabled Parking to clearly include provision for cycles. In general, cycle parking provision should include EV as for other types of vehicle.</li> <li>• Provision must accommodate non-standard bicycles.</li> <li>• Cycling should be given a key role in Travel Plans.</li> <li>• Provide maximum standards for motor vehicle parking.</li> <li>• 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.</li> <li>• Department for Transport's Cycle Infrastructure Design (LTN 1/20) sets out minimum standards in the absence of local guidance or standards.</li> <li>• SPD should set minimum standard below which provision should not fall and go further</li> </ul>	<ul style="list-style-type: none"> <li>• Review emphasis in the SPD on benefits of cycling.</li> <li>• Add cycling to Disabled Parking.</li> <li>• Review and consider adding detail on EV for cycles.</li> <li>• Update SPD to use latest versions of documents as appropriate.</li> <li>• Cycle spaces for residential and non-residential will be reviewed in light of recent Government guidance.</li> </ul>	

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	<p>than meeting conservative calculation of current cycling demand.</p> <ul style="list-style-type: none"> <li>London Cycle Design Standards provision for cycles should meet future projected demand plus 20%.</li> </ul>		
David Round (07)	<ul style="list-style-type: none"> <li>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.”</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
Debbie Evans (08)	<ul style="list-style-type: none"> <li>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</li> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>

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	<ul style="list-style-type: none"> <li>Should not be assumed that tenure or proximity to bus/train links will mean that residents will increase public transport use.</li> </ul>	<ul style="list-style-type: none"> <li>Agree with comment that seems to support approach taken in the SPD.</li> <li>Agree with comment and the guidance in the SDP is for decision makers to consider public transport as one factor in deciding parking provision.</li> </ul>	
East Meon Parish Council (09)	<ul style="list-style-type: none"> <li>We have a strong bias towards any new development not contributing to on-street parking.</li> <li>In general, EMPC supports this Parking SPD especially the clarity it provides in parking provision, cycle parking and how garages are counted in developments.</li> <li>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).</li> </ul> <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"> <li>Welcome general support for SPD.</li> <li>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.</li> <li>Agree that spaces provided will need to be usable. Review guidance on this point.</li> <li>Materials for parking areas to be covered by the Design SPD.</li> <li>Agree further detail required on EV charging.</li> </ul>	<ul style="list-style-type: none"> <li>Principle of parking provision on site to avoid additional on street parking, to be made explicit through adding wording to new paragraph 3.2.</li> <li>To ensure spaces are usable, wording to be added in new section 11 Parking Dimensions.</li> <li>Guidance on EV charging to be added in new section 4.</li> </ul>

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

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		<ul style="list-style-type: none"> <li>• Guidance requires that peak demand be taken into account.</li> <li>• 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.</li> </ul>	
Chris Kneale Friends of Lewes (14)	<ul style="list-style-type: none"> <li>• Support landscape approach to parking provision.</li> <li>• Concern that each case reviewed on merits might give rise to dispute and delay.</li> <li>• SPD should have similar aspiration to Lewes NDP policy AM3 to reduce car use.</li> <li>• Suggest SPD addresses EV charging points.</li> </ul>	<ul style="list-style-type: none"> <li>• Welcome support for landscape led approach.</li> <li>• Parking is often a contentious issue. The flexible approach taken by the SPD puts landscape first in decision-making.</li> <li>• 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.</li> <li>• Agree further detail required on EV charging.</li> </ul>	<ul style="list-style-type: none"> <li>• Guidance on EV charging to be added in new section 4.</li> </ul>
Stuart York Gosport Neighbourhood	<ul style="list-style-type: none"> <li>• Planning policies should ensure the built environment plays it part in reducing crime and disorder and the fear of crime.</li> </ul>	<ul style="list-style-type: none"> <li>• Review the points on design in the SPD and how these could better assist in preventing</li> </ul>	<ul style="list-style-type: none"> <li>• To ensure design of parking provision prevents crime, bullet</li> </ul>

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Policing Designing Out Crime Officer (15)	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Cycle storage within curtilage of dwelling and sufficiently secure.</li> <li>• Community cycle stores sufficiently secure with single robust door entry, good natural surveillance, lockable, keyless to exit and suitable anchor points for securing cycles.</li> <li>• Add additional bullet point to para 3.7 relating to Crime Prevention through Environment Design (CPTED).</li> <li>• Public overspill parking on the highway can increase likelihood of crime or cause obstruction.</li> <li>• 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.</li> <li>• Ask for minimum of at least one allocated parking space per dwelling.</li> <li>• Ask that at least one secure parking space for a pedal cycle per flat.</li> </ul>	<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"> <li>• Cycle spaces for residential and non-residential development will be reviewed in light of recent Government guidance.</li> <li>• Make explicit that SPD requires on site provision to avoid adding to on street parking issues.</li> <li>• 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.</li> </ul>	<p>points to be added at new paragraph 3.8</p> <ul style="list-style-type: none"> <li>• 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 &amp; 2 and new section 7 Disabled Parking.</li> <li>• Principle of parking provision on site to avoid additional on street parking, to be made explicit through adding wording to new paragraph 3.2.</li> </ul>

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Greatham Parish Council (16)	<ul style="list-style-type: none"> <li>For ease of access, spaces should be laid out side by side rather than one in front of the other.</li> <li>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.</li> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Review points on design of parking provision in the SPD.</li> <li>Agree further detail required on EV charging.</li> <li>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.</li> <li>Detailed guidance on layout of parking provision will be covered in the forthcoming Design SPD.</li> </ul>	<ul style="list-style-type: none"> <li>To avoid use of tandem parking, bullet point to be added at new paragraph 3.8</li> <li>Guidance on EV charging to be added in new section 4.</li> </ul>
Harry Puckering (17)	<ul style="list-style-type: none"> <li>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.</li> <li>Please allow commercial properties to have parking for 80% of projected visitors, as in the Netherlands.</li> <li>Please include parking for children’s cycles in the above.</li> <li>Please note cargo bikes/adapted bikes/trikes for people with disabilities need much more room than conventional bikes: up to 2m in</li> </ul>	<ul style="list-style-type: none"> <li>Cycle spaces for residential and non-residential development will be reviewed in light of recent Government guidance.</li> </ul>	<ul style="list-style-type: none"> <li>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 &amp; 2 and new section 7 Disabled Parking. Revised Table 2 to include standards for larger/oversize cycles.</li> <li>Dimensions for cycle parking in new section 11 Parking Space Dimensions to cross reference</li> </ul>

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	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"> <li>• There is a strong emphasis on sustainable travel and transport throughout the document, which Highways England (HE) supports.</li> <li>• Recommend that minimum parking space size is something that could be included in Table 2.</li> <li>• 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.</li> <li>• Recommend additional parking standard added to Table 2 for last mile delivery depots as these sites are outside B8 Storage and Distribution use class.</li> <li>• HE has found useful to include pictures/visuals for favoured parking arrangements and layouts.</li> <li>• HE does not consider the SPD will have any adverse impacts on the safety, reliability and operation of the strategic road network.</li> </ul>	<ul style="list-style-type: none"> <li>• Welcome support for emphasis on sustainable means of travel and that HE considers SPD will not have adverse impact on the strategic road network.</li> <li>• Review the guidance in relation to the use of minimum parking space dimensions.</li> <li>• Transport Assessment/Statement are required by the NPPF paragraph 111, therefore considered repetition of national policy to include in the SPD.</li> <li>• Review guidance in Table 2 in relation to last mile delivery depots.</li> <li>• Forthcoming Design SPD will provide detailed guidance on the layout of parking spaces/areas.</li> </ul>	<ul style="list-style-type: none"> <li>• Minimum dimensions for spaces to be added to new section 11 Parking Dimensions.</li> <li>• 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.</li> </ul>
Alan Byrne Historic England (19)	<ul style="list-style-type: none"> <li>• Historic England does not wish to comment on the Parking Supplementary Planning Document, which deals with matters largely beyond the remit of Historic England.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted.</li> </ul>	<ul style="list-style-type: none"> <li>• None.</li> </ul>



Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
Horndean Parish Council (20)	<ul style="list-style-type: none"> <li>Noted the consultation and no comments to make.</li> </ul>	<ul style="list-style-type: none"> <li>Noted.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>
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"> <li>Parking places in towns are often expensive to build, ugly, accumulate toxic runoff and take up valuable space.</li> <li>Pavement parking is a new kind of Anti-Social Behaviour.</li> <li>New developments can have purpose built walking and cycle routes and prioritise public transport.</li> <li>Residential developments in or near town centres need fewer car parking and more and better cycle parking provision.</li> <li>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.</li> <li>I support the assessment for increased cycle spaces submitted by Cycle Lewes.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> <li>Detail on the design of parking will be covered in the forthcoming Design SPD.</li> <li>Review whether SPD could require space for car clubs and taxis at appropriate locations.</li> <li>Cycle spaces for residential and non-residential development will be reviewed in light of recent Government guidance.</li> </ul>	<ul style="list-style-type: none"> <li>Principle of parking provision on site to avoid additional on street parking, to be made explicit through adding wording to new paragraph 3.2.</li> <li>To ensure car clubs and taxis are considered in parking provision, wording to be added at new paragraph 5.5 and 8.3 respectively.</li> <li>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 &amp; 2 and new section 7 Disabled Parking.</li> </ul>
John Evans (22)	<ul style="list-style-type: none"> <li>Main concern in Coldwaltham is “leisure” parking by visitors. Particular areas with high</li> </ul>	<ul style="list-style-type: none"> <li>Note the concerns about parking issues in Bury regarding visitors and the local school.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<p>demand at certain times without suitable parking such as Bury Hill.</p> <ul style="list-style-type: none"> <li>Local primary school has no provision for pick up/drop off, or for part time staff and only 8 parking places.</li> </ul>	<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"> <li>SPD requires on-site parking provision to meet the need of the development and avoid adding to existing on street parking issues.</li> </ul>	
<p>Judy Fowler Chichester District Councillor (23)</p>	<ul style="list-style-type: none"> <li>Raising issue of pavement parking in Midhurst, with photo showing an example in Grange Road.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> <li>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</li> </ul>	<ul style="list-style-type: none"> <li>Principle of parking provision on site to avoid additional on street parking, to be made explicit through adding wording to new paragraph 3.2.</li> </ul>

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		at new developments that avoids adding to existing parking issues.	
Julia Waterlow (24)	<ul style="list-style-type: none"> <li>• SDNPA should be considering how to reduce car usage rather than encourage it by insisting on car parking in new developments.</li> <li>• Developers should contribute towards local bus services or car share system.</li> <li>• If insisting on car parking, not enough emphasis (in the SPD) on design of car parking. Concerns about hard landscaping and water run-off.</li> <li>• New car parking should have permeable surfaces and water treatment to deal with vehicle pollution.</li> <li>• Need planting to soften the impact and provide biodiversity.</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Existing planning policies allow decision makers to require developers to contribute to other forms of transport as appropriate.</li> <li>• 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.</li> <li>• The forthcoming Design SPD will cover landscape and surface treatments including planting.</li> </ul>	<ul style="list-style-type: none"> <li>• None.</li> </ul>

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
Kate Simons Senior Environmental Protection Officer Chichester District Council (25)	<ul style="list-style-type: none"> <li>The references to provision of cycle parking and electric vehicle charging points are welcomed and I have no further comments to make.</li> </ul>	<ul style="list-style-type: none"> <li>Noted.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
Katherine Pang East Hampshire District Council (26)	<ul style="list-style-type: none"> <li>Para 4.4. clarify whether referring to internal or external measurements for garages.</li> <li>(For Table 2) clarify whether for non-residential development, floor space calculations are Gross External Area (GEA) or Gross Internal Area (GIA).</li> <li>No mention in guidance of appropriate layouts.</li> <li>Appears to be no guidance on required dimensions for parking spaces.</li> </ul>	<ul style="list-style-type: none"> <li>Clarify description of measurements.</li> <li>Detailed on parking design in the forthcoming Design SPD.</li> <li>Agree further detail needed on the dimensions of parking spaces.</li> </ul>	<ul style="list-style-type: none"> <li>Add wording to clarify measurements refer to Gross Internal Area at new paragraphs 5.7, and 8.11</li> <li>Minimum dimensions for spaces to be added to new section 11 Parking Dimensions.</li> <li>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.</li> </ul>
Kelsie Learney Winchester City Councillor (27)	<ul style="list-style-type: none"> <li>Object to the draft document in particular due to the proposed provision of cycle parking.</li> <li>Document fails to comply with Local transport note 1/20 Cycle infrastructure design which has updated expected standards.</li> <li>As per the transport note residential developments should have ground floor, secure, level access cycle storage with one space per bedroom</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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 &amp; 2 and new section 7 Disabled Parking. These standards comply with Cycle Infrastructure Design, Local Transport Note, LTN 1/20.</li> </ul>

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> <li>• Particular reference needs to be made to requirements for parking suitable for bikes with disabled adaptations - note this has equalities implications.</li> <li>• 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.</li> <li>• Levels of secure long-term cycle parking need to be included separately.</li> <li>• Where requirement relates to a travel plan a minimum level of cycle parking should still be set.</li> <li>• Garages – clarify that specifications are minimum internal sizes</li> <li>• Garages – if used for cycle parking, should be large enough to allow for at least two cycles in addition to a car.</li> </ul>	<ul style="list-style-type: none"> <li>• Clarify description of measurements.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Minimum dimensions for spaces to be added to new section 11 Parking Dimensions.</li> <li>• 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.</li> </ul>
Liss Parish Council (28)	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• We would like SDNPA to provide evidence of real world test cases that parking</li> </ul>	<ul style="list-style-type: none"> <li>• Welcome support for those specific parts of the SPD.</li> <li>• 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.</li> <li>• SPD does state that conditions may exist for a lower parking</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Principle of parking provision on site to avoid additional on street parking, to be made explicit through adding wording to new paragraph 3.2.</li> </ul>

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"> <li>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.</li> <li>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.</li> <li>Critical that officers have complete understanding of local public transport options and existing parking issues in relation to para 3.11.</li> <li>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.</li> <li>SDNPA to commit to a 6-month review of parking standards to assess operation of SPD</li> </ul>	<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"> <li>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.</li> <li>Add wording on tandem parking.</li> <li>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)]</li> <li>Review of SPD will be carried out as appropriate, especially if feedback from decision makers</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> <li>Add wording to new paragraph 3.12 that parking survey will be required as part of robust evidence to justify lower provision.</li> <li>Add bullet point to new paragraph 3.8 that tandem parking should be avoided in new development.</li> </ul>

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	in consultation with local planning committees.	suggests the policy is failing to meet intended outcomes.	
Midhurst Society (29)	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Welcome support for the SPD and note the comment that guidance will ensure sufficient parking is provided on-site at a new development.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
Midhurst Town Council (30)	<ul style="list-style-type: none"> <li>In general support this document.</li> <li>Recognise that while Midhurst seen as sustainable location in the SPD, off street parking continues to be a problem in the town.</li> <li>Welcome landscape led, flexible approach that each development will be regarded on its merits.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
National Trust (31)	<ul style="list-style-type: none"> <li>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.</li> <li>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</li> </ul>	<ul style="list-style-type: none"> <li>Welcome comments supporting the approach taken by the SPD.</li> <li>Review wording for non-residential sites in relation to multi use developments.</li> <li>Site specific assessment required for non-residential sites and this process will cover the provision of different types</li> </ul>	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"> <li>• 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.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted.</li> <li>• Notified Natural England about scope of Parking SPD and asked if wanted to comment further. No further comment received in response.</li> </ul>	<ul style="list-style-type: none"> <li>• Natural England state no requirement for Strategic Environmental Assessment.</li> </ul>
Patching Parish Council (33)	<ul style="list-style-type: none"> <li>• Patching Parish Council (PPC) broadly supports the SPD.</li> <li>• 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.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Welcome the support for the approach taken and that Parish Council view is this will support NDP policies.</li> <li>• Note particular concerns around on street parking and visitor parking in Patching.</li> <li>• Ward is smallest unit where Census data is available for car ownership by type of dwelling. Review wording in guidance on the parking calculator.</li> <li>• Agree that on street parking problems are significant issue across SDNPA communities. Add wording to make explicit</li> </ul>	<ul style="list-style-type: none"> <li>• Principle of parking provision on site to avoid additional on street parking, to be made explicit through adding wording to new paragraph 3.2.</li> <li>• 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.</li> </ul>



Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> <li>Support the application of the two principles in determining parking provision for non-residential development.</li> <li>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.</li> <li>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.</li> </ul>	<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"> <li>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.</li> </ul>	
Richard Alderman (34)	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Noted comments and concerns about parking issues in Hill View and the importance of the specific area of garages.</li> <li>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</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>

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		understanding of current parking demand in the local area.	
Roger Mullenger (35)	<ul style="list-style-type: none"> <li>• Are "staff" defined as (the) maximum number on site at one time(s)?</li> <li>• Does this take account of shift patterns and more remote working?</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Add wording in new paragraphs 8.6 and 8.11 to add further detailed guidance for parking provision, including for staff.</li> </ul>
Rowlands Castle Parish Council (36)	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Welcome general support for approach taken by the SPD.</li> <li>• 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.</li> <li>• Welcome support for approach on garages.</li> </ul>	<ul style="list-style-type: none"> <li>• None.</li> </ul>
Sheet Parish Council (37)	<ul style="list-style-type: none"> <li>• Concerned regarding new development where roads are private and under control of a management company.</li> </ul>	<ul style="list-style-type: none"> <li>• Note concerns about new development with "un-adopted"</li> </ul>	<ul style="list-style-type: none"> <li>• When granting planning permission, SDNPA will be satisfied that, the residential</li> </ul>

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	<ul style="list-style-type: none"> <li>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.</li> <li>This means that the parking associated with the planning consent is effectively reduced.</li> </ul>	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"> <li>SPD should define the algorithm that is implemented in the spreadsheet. Process should be clearly explained in words, possibly also with relevant equations.</li> <li>I think it is important that users of the spreadsheet understand what it is doing.</li> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Provide more information on the data the parking calculator uses and how it works.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>
Simon Dear Waverley Borough & Haslemere Town Councillor (39)	<ul style="list-style-type: none"> <li>In my view, parking policy etc. should follow the standards set down by the democratically elected, relevant Borough Council in which</li> </ul>	<ul style="list-style-type: none"> <li>NPPF provides for and encourages planning authorities to set local parking standards</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

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"> <li>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.</li> </ul>	
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"> <li>Provision should be made for parking laybys for delivery vehicle.</li> <li>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)</li> <li>Provision should be made for electric motorcycle parking.</li> <li>Public car parks and on street parking should also include electric charging points for cars</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> <li>SPD requires provision for visitor parking and this can be used by delivery vehicles rather than separate dedicated spaces</li> </ul>	<ul style="list-style-type: none"> <li>Guidance on EV charging to be added in new section 4.</li> <li>Minimum dimensions for spaces to be added to new section 11 Parking Dimensions.</li> <li>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 &amp; 2 and new section 7 Disabled Parking.</li> <li>Dimensions for cycle parking in new section 11. Parking space dimensions to cross reference Cycle Infrastructure Design,</li> </ul>

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

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> <li>• Cycle parking at bus and railway stations should be enclosed structures for percentage of forecasted users.</li> <li>• Encourage car clubs and reference in SPD.</li> <li>• 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.</li> <li>• Recommend that unless there is evidence proving it is logistically or economically unrealistic, electric vehicle charging facilities must also be provided.</li> <li>• Residential parking, SPD does not actively encourage reducing number of car parking spaces where there are good transport links.</li> <li>• Garages concerned that built but never used for garaging.</li> <li>• Requirements for disabled parking should be clearly documented.</li> <li>• Public parking; design should minimise visual impact; secure parking and EV charging</li> </ul>	<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"> <li>• 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.</li> <li>• 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.</li> <li>• Cycle spaces for residential and non-residential development will be reviewed in light of recent Government guidance.</li> </ul>	

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<p>provided; include parking for car sharing schemes; providers should be encouraged to enter into arrangements for cycle share schemes.</p>	<ul style="list-style-type: none"> <li>• SPD allows for lower parking provision where robust evidence provided that the correct conditions exist.</li> <li>• 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.</li> <li>• Review whether SPD could require space for car clubs.</li> <li>• Welcome support for the various elements of the SPD.</li> <li>• Guidance on EV charging to be added.</li> <li>• 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.</li> <li>• Agree with comment on garages, SPD only counts garages as third of space therefore significantly preferring other types of parking provision.</li> </ul>	

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		<ul style="list-style-type: none"> <li>• Agree, add wording on dimensions of disabled parking spaces.</li> <li>• Requirements for public parking are covered in policy SD22 of the Local Plan.</li> </ul>	
Susan Garnett (41)	<ul style="list-style-type: none"> <li>• Concerned about commuter parking, particularly for Bramshott and Liphook as well as Petersfield.</li> <li>• Stations and town centres need adequate parking.</li> <li>• Increased commuter parking at Liphook from Borden housing development. Commuters need to drive in absence of good links from settlements by public transport.</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• None.</li> </ul>
Tichborne Parish Council (42)	<ul style="list-style-type: none"> <li>• Tichborne PC fully supports the rationale of the Parking SPD.</li> </ul>	<ul style="list-style-type: none"> <li>• Welcome support and noted.</li> </ul>	<ul style="list-style-type: none"> <li>• None.</li> </ul>
West Sussex County Council (43)	<ul style="list-style-type: none"> <li>• Para 2.7 No indication of levels/percentage of spaces to be provided with EV charging points.</li> </ul>	<ul style="list-style-type: none"> <li>• Agree, guidance on EV charging to be added.</li> </ul>	<ul style="list-style-type: none"> <li>• Guidance on EV charging to be added in new section 4.</li> </ul>



Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Para 5.1 Clarify the basis on which 5% for disabled parking has been derived.</li> <li>• Para 5.2 May be appropriate to include dimensions for disabled spaces if on-plot provision is expected to ensure accessibility.</li> <li>• Para 6.3 Reference should also be made to cycle parking provision, and that this is covered and secure.</li> <li>• Para 7.1 Recommend parking surveys follow the Lambeth Methodology</li> <li>• 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)</li> <li>• WSCC would look for the SPD to include guidance and standards on EV charging.</li> </ul>	<ul style="list-style-type: none"> <li>• Agree, add wording regarding parking survey required if proposing lower provision than the output from the parking calculator as the starting point.</li> <li>• 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.</li> <li>• Disabled parking figure follows that used in West Sussex parking guidance.</li> <li>• Add dimensions of disabled parking.</li> <li>• Cycle parking for residential and non-residential development will be reviewed in light of recent Government guidance.</li> <li>• Add wording to reference Lambeth Methodology.</li> </ul>	<ul style="list-style-type: none"> <li>• Add wording to new paragraph 3.12 requiring parking survey if provision lower than output from the parking calculator.</li> <li>• Minimum dimensions for spaces to be added to new section 11 Parking Dimensions.</li> <li>• 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.</li> <li>• Add wording to new paragraph 9.1 that parking capacity surveys should be carried out using the Lambeth Methodology.</li> </ul>

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

## 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"> <li>The Committee are in full support of this document</li> </ul>	<ul style="list-style-type: none"> <li>Welcome support and noted</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>
Bramber Parish Council (02a)	<ul style="list-style-type: none"> <li>6.2 Table 1 below sets out the <b>minimum</b> recommended levels of cycle parking provision for new residential development (reflects wording in Table 11-1 of Local Transport Note 1/20</li> <li>Table 1 – <b>Minimum</b> cycle space provision, new residential development</li> </ul>	<ul style="list-style-type: none"> <li>Cycle Infrastructure Design, Local Transport Note (LTN) 1/20 uses the wording “suggested minimum” in Table 11-1. The SPD is consistent with LTN 1/20. Footnotes 10/11, below Table 1 in the SPD, clarify this point.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>
Bramshott and Liphook Parish Council (03a)	<ul style="list-style-type: none"> <li>Clarifying issue raised in first consultation concerning inadequate parking provision at transport interchanges.</li> </ul>	<ul style="list-style-type: none"> <li>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</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>

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"> <li>• Adequate parking at, and providing public transport connections to, railway stations is a matter for the local transport authority and Network Rail.</li> </ul>	
Buriton Parish Council (04a)	<ul style="list-style-type: none"> <li>• Amend Ward name to Buriton &amp; East Meon in drop down list in the Parking Calculator (point 1)</li> <li>• Concerns about use of the parking calculator, including interpretation of wording at paragraph 3.2 and 5.1 (points 2-9)</li> <li>• Rounding down of spaces in paragraph 5.4 must not happen (point 10)</li> <li>• Storage structures for cycle parking; Paragraph 6.3 no mention of design; suggest larger garage size to accommodate cycles.</li> <li>• Greater emphasis on permeable surfaces for parking</li> </ul>	<ul style="list-style-type: none"> <li>• Ward name to be amended in Parking Calculator drop down list</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• Amend Ward name to Buriton and East Meon in the Parking Calculator.</li> </ul>

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"> <li>• 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.</li> </ul>	

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>	
Debbie Evans (08a)	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• 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).</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>

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"> <li>No comment</li> </ul>	<ul style="list-style-type: none"> <li>Noted.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>
Elsted and Treyford Parish Council (47)	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>
Marguerite Oxley, Environment Agency (10a)	<ul style="list-style-type: none"> <li>No comment.</li> </ul>	<ul style="list-style-type: none"> <li>Noted.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>
Findon Parish Council (12a)	<ul style="list-style-type: none"> <li>Supports content and no further comments</li> </ul>	<ul style="list-style-type: none"> <li>Welcome support.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>
Fittleworth and District Association (48)	<ul style="list-style-type: none"> <li>Thank you for opportunity to comment no matters that wish to raise.</li> </ul>	<ul style="list-style-type: none"> <li>Noted.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>
Fittleworth Parish Council (13a)	<ul style="list-style-type: none"> <li>Thank you for addressing our queries on the draft.</li> </ul>	<ul style="list-style-type: none"> <li>Noted.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>
Graham Beck (49)	<ul style="list-style-type: none"> <li>Garages, or perhaps carports, are best for achieving objectives of parking being well</li> </ul>	<ul style="list-style-type: none"> <li>For the reasons stated in paragraph 5.6, forms of parking</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>

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"> <li>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.</li> <li>Introduction of electric car charging means garages will also be used for this purpose.</li> <li>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.</li> <li>Properly constructed garages designed for modern day purposes should be given full credit of one parking space rather one third only.</li> </ul>	<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"> <li>Welcome the SPD and clear statement of principles.</li> <li>Hopes sufficient account taken of likely very significant move in the next 10 years towards use of Electric Vehicles and provision of charging points.</li> </ul>	<ul style="list-style-type: none"> <li>Welcome support for the SPD.</li> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
Historic England (19a)	<ul style="list-style-type: none"> <li>Consultation document deals with matters that are beyond the remit and concern of</li> </ul>	<ul style="list-style-type: none"> <li>Noted</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>



Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<p>Historic England and consequently, we do not wish to comment on the Parking SPD.</p>		
<p>Lavant Parish Council (51)</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• “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?</li> <li>• We <b>object</b> 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.</li> <li>• LPC concerned possible to manipulate the number of spaces down by massaging the input.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

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"> <li>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.</li> </ul>	
Natural England (32a)	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Noted</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>
Peter Wonson (52)	<ul style="list-style-type: none"> <li>No comment as time and effort will be wasted as SDNPA merely carrying out an exercise, will take no notice and therefore pointless.</li> </ul>	<ul style="list-style-type: none"> <li>Sorry you feel this way about responding to the consultation. This Consultation Statement, published on the SDNPA website summarises all</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> <li>(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.</li> </ul>	<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"> <li>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.</li> <li>Comprehensive Sustainable Access SPD needed to satisfy outcomes in the South Downs Partnership Management Plan</li> <li>SDNPA needs to be much bolder and more challenging in tackling climate change</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> <li>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</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>

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"> <li>• Thank you for including Town Council Planning Committee in the consultation process, no comments to make.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted.</li> </ul>	<ul style="list-style-type: none"> <li>• None.</li> </ul>
Rogate Parish Council (55)	<ul style="list-style-type: none"> <li>• Highlight draft policy T3: Parking in the Rogate and Rake Neighbourhood Plan – new parking to provide sufficient off-street parking.</li> <li>• Clarify Electric Vehicle (EV) charging point provision for public parking.</li> <li>• SPD needs to address parking on verges and congestion of narrow roads around visitor attractions.</li> <li>• On-street parking issues in Rogate, helpful to have meeting between Parish Council, SDNPA and Highways Authority to find a solution.</li> <li>• Could find no reference to Highways Authority and their responsibilities in the SPD.</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Requiring EV charging points for existing public parking is outside the scope of the SPD, which guides new development.</li> <li>• Parking on verges at existing locations is a matter for the local Highways Authority.</li> <li>• Noted, will pass on request to appropriate colleagues in SDNPA to respond.</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• None.</li> </ul>

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA response	Proposed action
		<p>adopted the SPD will replace the existing Highways Authority policies on parking provision at new development.</p>	
<p>Sompting Estate, Mike Tristram (56)</p>	<ul style="list-style-type: none"> <li>• In general, Sompting Estate Trustees support the SPD. Positive to have capacity in the SPD through overarching principles to reach appropriate solutions for parking.</li> <li>• Surprisingly little guidance on holiday lets, glamping and camping, tourist attractions or diversified business interests.</li> <li>• Rural proofing should be considered in the SPD, for example in relation to the local feasibility of EV charging facilities.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Welcome overall support and specific highlighting of the overarching principles, designed to provide flexibility in decision-making.</li> <li>• 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.</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>

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"> <li>• 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.</li> </ul>	
Stedham with Iping Parish Council (57)	<ul style="list-style-type: none"> <li>• In general, welcome the Parking SPD as recognised seeking to address an issue that is a blight to many rural communities.</li> <li>• Parking Calculator, developers will consider this a required number to achieve consent;</li> </ul>	<ul style="list-style-type: none"> <li>• Welcome the general support for the Parking SPD.</li> <li>• The output from the parking calculator is only one factor in determining residential parking</li> </ul>	<ul style="list-style-type: none"> <li>• None.</li> </ul>

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"> <li>• Landscape consideration means if amount of parking not achievable, development oversized and should not be permitted.</li> <li>• 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 Tempro factors, what process to challenge them and frequency they will be reviewed; using historic car ownership data fundamentally flawed.</li> <li>• Agree with garages being treated as third of a space. Suggest this ratio is still too high.</li> </ul>	<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"> <li>• 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.</li> <li>• As stated, the parking calculator is a guide to levels of future car ownership and is only one factor in determining residential parking provision. Tempro 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 Tempro dataset is amended as required on an infrequent</li> </ul>	

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"> <li>• 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.</li> </ul>	
Surrey County Council, Planning (58)	<ul style="list-style-type: none"> <li>• Thank you for consulting Surrey County Council, we have no specific comments to make.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted.</li> </ul>	<ul style="list-style-type: none"> <li>• None.</li> </ul>
Stuart York, Designing Out Crime Officer, Hampshire Police (15a)	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• None.</li> </ul>



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.	