

## Consultation Statement for the Parking Supplementary Planning Document (SPD)

This statement has been prepared by Havant Borough Council under regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It sets out the details of whom the Council consulted on the draft Parking Supplementary Planning Document (SPD). A summary of the issues raised and how the issues have been addressed in this SPD can be found in Appendix 2.

The current parking standards are set out in the Residential Parking and Cycle Provision Supplementary Planning Document which was adopted in March 2010. The SPD provides guidance on the levels of parking that should be provided in new developments. It is the intention that the revised Parking Standards SPD will replace the existing standards when formally adopted.

Initially internal consultation was undertaken during the development of the SPD by the Planning Policy Team with relevant officers/teams within the council namely the Development Engineer, Parking and Traffic Management, Landscape, Development Management and Economic Development. An outline of this consultation work that the council has undertaken can be found in Appendix 1.

A separate consultation exercise was undertaken for the SEA screening opinion with the three statutory consultees<sup>1</sup>, between 15 May 2015 and 19 June 2015. SEA Screening has concluded that it is unlikely that there will be any significant environmental effects arising and it is the council's opinion that a SEA is not required and consequently no revisions have been made to the SEA document. More information, including details of the representations received can be found on our website: <http://www.havant.gov.uk/draft-parking-supplementary-planning-document/sea-screening-draft-parking-supplementary-planning>

The public consultation on the draft Parking SPD was carried out in accordance with the process outlined in the Statement of Community Involvement (SCI). The consultation period ran for 5 weeks between Friday 10<sup>th</sup> July 2015 and Friday 14<sup>th</sup> August 2015. This included:

- 278 letters and 257 emails sent to organisations and individuals in the contact database (including statutory consultees and duty to cooperate bodies)
- Press release (Friday 10<sup>th</sup> July)
- Local Plan Newsletter (issued to everyone on the Local Plan database for whom we have an email address and anyone registered on the main Havant Borough Council webpage who has expressed an interest in planning)
- Link from homepage on the Havant Borough Council website to dedicated parking SPD consultation pages
- The SPD was available to view at the Public Service Plaza and libraries across the Borough

The Council received 15 representations during the consultation period from a variety of organisations as well as local residents. Each representation has been considered to inform

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<sup>1</sup> The Environment Agency, Historic England and Natural England

the final version of the SPD. A summary and analysis of the representations the Council received can be found in Appendix 2.

## Appendix 1: Summary of Initial Internal Consultation

Who was consulted?	Summary of issue(s) raised	How addressed in the draft SPD
Development Engineer, Parking and Traffic Management, Landscape, Development Management and Economic Development	<p>An earlier version of the document was circulated internally to officers for comment.</p> <p>Comments received included:</p> <ul style="list-style-type: none"> <li>• Amendments to the design of the cover</li> <li>• Various aspects relating to landscape</li> <li>• Clear explanation required as to why the standards have moved from maximum to minimum requirements</li> <li>• Amount of retirement parking (Table 4C of the Draft Parking SPD). However the wording in the draft document allows for flexibility. No change made pending testing of the document through the consultation process</li> </ul>	The relevant comments were used in the preparation of the SPD and informed the content of the final Draft Parking SPD

## Appendix 2: Summary and Analysis of Consultation Responses

Who was consulted?	Summary of issue(s) raised	HBC Comment/Action
<b>Introduction and General Comments</b>		
Havant Area Disability Access Group (HADAG)	The document does not complement and collect together existing regulations, it introduces conflicting requirements which fail to meet the downstream (in planning cycle terms) requirements of Building Regulations, specifically Part 'M' and the overall standard, BS8300 from which they are drawn.	In terms of accessible parking standards, Building Regulations simply stipulate that ' <i>Reasonable provision must be made for people to gain access to and use the building and its facilities.</i> ' The guidance in Approved Document M on the number of accessible parking spaces for buildings other than dwellings simply states that 'at least one parking bay designated for disabled people is provided on firm and level ground as close as feasible to the principal entrance of the building.' BS8300 provides guidance offering technical access solutions (i.e. best practice on how to meet building regulations), however, it is not a requirement. The SPD aims to ensure that suitable and adequate parking is provided on all new developments.
HADAG	<p>Comments received included:</p> <ul style="list-style-type: none"> <li>• The document is incredibly difficult to make sense of, either for consultation purposes, or from the perspective of a developer.</li> <li>• It is pitched well above the level of the average</li> </ul>	<p>Comments noted. The word 'handicapped' has been removed from Table 3 on page 9.</p> <p>Havant and Waterlooville centres have different parking standards because they are considered to be more accessible by non-car means.</p>

	<p>householder and its sheer complexity would add cost to any project simply in ensuring any plans comply with the occasionally contradictory requirements, ie those of a CBD (Central Business District, ie Havant Town Centre versus a residential home) for example.</p> <ul style="list-style-type: none"> <li>• Our group takes extreme offence of the use of the word 'handicapped' in table 3 on page 9.</li> </ul>	
HADAG	<p>This document fails the tests of the public sector equality duty, in not promoting the reduction of discrimination, and by focusing on 'pedestrian and cycle-friendly layouts' is somewhat discriminatory against those with 'protected characteristics' who should be considered in this document. There is a statement which states the document will bring all parking requirements into one place, but the document gets the standards on disabled parking wrong, totally ignores the requirement for set-down spaces, and does not consider any provision for charging of scooters and wheelchairs in any development of any scale. This introduced conflict between planning condition requirements and building control requirements.</p>	<p>Paragraph 4.01 states that 'parking and circulation layouts should aim to provide a safe and convenient pattern of movement into, and out of a site, putting pedestrians, cyclists and <i>those with mobility restrictions</i> at the top of the hierarchy of road users. However, the reference to 'pedestrian and cycle-friendly layouts' in Paragraph 1.02 has been amended to say 'accessible to all'. Paragraph 3.14 talks specifically about parking for people with disabilities; however, this has been expanded to provide more detail. Part M of Building Regulations and BS 8300 have been signposted to provide further information.</p> <p>The SPD does consider the provision of charging for scooters and wheelchairs (see Paragraph 4.21). This has been strengthened by requiring that where possible garages and car ports should have electric sockets which should allow charging and storage of mobility scooters and wheelchairs.</p> <p>A new section on drop-off spaces has been included (paragraph 4.19).</p>
HADAG	<p>Finally, we request a justification for this document against our request for a similar SPD relating to accessibility requirements, which was declined with the statement:</p> <p>"Whilst meeting the requirements of other legislation, e.g. Equalities Act, and Building Regulations should not be 'unnecessarily adding to the financial burden on the development', planning policy must not duplicate other legislation. Whilst I note that Hammersmith and Fulham has an SPD that isn't too old (i.e. Pre NPPF) and includes access proposals I am not</p>	<p>In terms of accessible parking standards, Building Regulations simply stipulate that '<i>Reasonable provision must be made for people to gain access to and use the building and its facilities.</i>' We do not consider that the SPD conflicts with that. However, there is other guidance and best practice available. The SPD seeks to ensure that suitable and adequate parking is provided on new developments. It is considered that an Accessibility SPD would run the risk of further adding to the complexities of the disconnect between planning and building regulations that is discussed in</p>

	<p>convinced about it as it does appear to duplicate some Building Regulations.”</p> <p>The above statement talks about duplication as being a reason not to write one, yet this SPD goes as far as to introduce conflict and contradiction between planning and building regulations.</p>	<p>this representation.</p>
Hampshire County Council	<p>Hampshire County Council would like to make a general comment on the Parking SPD following a change to the NPPF in respect of parking standards as announced by (former minister) Eric Pickles in his ministerial statement in March 2015: (<a href="https://www.gov.uk/government/speeches/planning-update-march-2015">https://www.gov.uk/government/speeches/planning-update-march-2015</a>)</p> <p>This statement confirmed the addition of text to paragraph 39 of the NPPF stating that 'Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network.'</p> <p>This statement is referenced at paragraph 1.05 of the draft SPD and the Council claims a clear and compelling justification for the SPD in terms of addressing problems caused by previous maximum parking standards. However, the SPD still applies maximum parking standards for residential development in Havant and Waterlooville town centres. This seems incompatible with the 'clear and compelling justification' given for the SPD. In order to be consistent and to accord with the requirements of Government policy this (the application of maximum standards in Havant and Waterlooville centres) requires further explanation / justification beyond that given on page 21 of the SPD which relates back to the Ministerial statement.</p>	<p>Maximum parking standards applied generally can cause problems but they are still appropriate in highly accessible sustainable locations such as the town centres particularly if we want to encourage more sustainable methods of transport.</p>
Highways England	<p>Highways England's role is to operate, maintain and modernise the strategic road network (SRN). For Havant Borough Council this relates to the M27. No further comments.</p>	<p>Noted.</p>
Historic England	<p>No comments made.</p>	<p>Not applicable.</p>
Langstone Residents Association (1)	<p>Comments received included:</p> <ul style="list-style-type: none"> <li>The document should specify the period for which its guidance will apply,</li> </ul>	<p>The SPD expands on policy contained within the Local Plan which specifies a timeframe. Also, the SPD will be reviewed when it is considered to be</p>

	<p>presumably as for the Local Plan</p> <ul style="list-style-type: none"> <li>The document refers to new developments. Will this SPD be applied in future to re-development (e.g. change of use) of existing properties and current developments?</li> </ul>	<p>out of date (either when the Local Plan is out of date or national policy changes)</p> <p>The SPD will apply to all planning applications that result in additional residential or non residential floorspace whether they are new builds or redevelopment.</p>
Langstone Residents Association (2)	<p>Comments received included:</p> <ul style="list-style-type: none"> <li>Welcomes the review of parking standards within the borough.</li> <li>Clauses 1.05 - 1.08 recognise the reality and are to be supported.</li> <li>Clause 1.12 - the clause should also make specific reference to extensions/alterations of commercial premises.</li> </ul>	<p>Support noted. Paragraph 1.12 states that the parking standards will apply to all developments that will result in the creation of non-residential floorspace. This would include extensions to existing non-residential uses. However, this paragraph has been amended to make it clearer.</p>
Natural England	No comments made in respect of the SPD.	Not applicable.
Helyer Davies Architects Ltd	Support for minimum standards rather than max. Also like the approach to sustainable/better connected areas and cycle parking provisions.	Support noted.
Mr Hoskinson	Noted concerns about Penhurst Road, Bedhampton.	Comments noted.
Mr Denyer	At the strategic level I must question the need for each local authority to have its own SPD on car parking.	Comments noted. The evidence supporting the SPD is based on local data, such as car ownership levels; therefore it makes sense to set standards locally.
Mr Denyer	Paragraph 1.15 – Although I'm sure this isn't your intention this sentence is a carte blanche for officers to amend and adapt the guidance without reference to the public or apparently members. If there is to be any purpose to consulting on documents such as these then I feel I must object to that sentence.	Agreed. Paragraph 1.15 has been amended to same text as was in the previous SPD (paragraphs 1.6 and 1.7) which talks about community involvement.
Marine Management Organisation	No comments made.	Not applicable.
Office of Rail Regulation	No comments made.	Not applicable.
Mrs Morrell	Noted concerns about the parking provision at the Wellington Park, Waterlooville development	Comments noted.
<b>Parking Standards</b>		
Mr Denyer	Note 1 to Table 1. The threshold figure (500 sqm) is not the same as that in table 5.1 (1000sqm).	Comments noted. Note 1 to Table 1 to has been amended to match figure in Table 5.1
Mr Denyer	Note 3 to Table 2 - I believe there should be a definition of 'major' not left to the discretion of individual officers. If Table 5.1 provides the threshold it should be referenced from here.	Major development means the point at which the thresholds requiring travel plans are hit. These are set out in Chapter 5 which is signposted in this note.
Mr Denyer	Car parking. Following tables 4A and	Research has shown (English

	<p>4B there is the same note 1 'With the exception of small residential developments an additional 20% of unallocated parking for visitors should be accommodated'. Additional provision for visitors/unallocated residents parking is agreed to be prudent where most parking is allocated to individual properties, although it would be helpful if 'small' was defined, possibly by total number of bedrooms rather than dwelling units (10 one bedroom flats have very different needs to 10 four bedroom houses), but the same requirement where most or all parking is unallocated/communal/shared is inconsistent with government advice which recognises that with unallocated parking visitors are able to parking in spaces otherwise used by absent residents. To require an additional 20% unallocated parking for visitors where residents parking is communal potentially will over-provide on-site parking with a consequent inefficient use of land.</p>	<p>Partnerships 2006, Car parking What Works Where) that an extra 0.2 spaces per dwelling is required to meet the likely visitor demand. The size of the dwelling is unlikely to have a significant impact on the number of visitors it generates. However, where spaces are not allocated this could be more flexible. A lower visitor parking standard could be acceptable provided that it can be shown sufficient resident cars will likely be absent when visiting takes place. Note 1 to Table 4B amended to this effect.</p>
Mr Denyer	<p>Note 2 says 'It is widely accepted that single on plot garages are often unavailable for cars because they are being used for storage. Given the extent of this practice whether or not garages will be counted towards parking provision will be determined on a case by case basis'. This would seem to be very poor policy. The SPD should provide clear, unambiguous guidance as to under what circumstances a garage will be counted towards on-site parking. To leave it to the judgement of officers on a case by case basis may lead to inconsistent decisions and potentially accusations of inconsistency and bias by officers in favour or against individuals or companies. Matters are not really clarified by paragraphs 4.09 and 4.10 where the former refers to the 3m*6m garage having space for cycles and the latter implies not accepting the garage as a parking space unless there is separate cycle storage. Paragraph 4.12 just adds further confusion.</p>	<p>Agree that there should be clarity as to whether garages are counted or not. Note 2 to Table 4A has been deleted and Paragraph 4.12 has been amended to make clear that garages will be counted provided that the size standards referred to in paragraph 4.09 are met.</p>
Mr Denyer	<p>As a general comment, the parking demand arising from three bedroom owner-occupied house in Cowplain ward is likely to be significantly higher than a similar dwelling in Battins or Bondfields wards. Whilst this difference may seem marginal where parking is allocated to each dwelling it could be</p>	<p>Comments noted. Unfortunately we do not have access to such parking demand modelling software.</p>

	significant, and lead to inefficient use of land, for schemes where parking is communal for example often those submitted on behalf of Housing Associations. West Sussex and East Sussex have a sophisticated parking demand model that reflects location, type and tenure which addresses this concern. Such a model may be beyond the resources of HBC but is an argument in favour of sub-regional or county-wide standards.	
HADAG	I've seen much talk of cyclists, but the only reference to disability are incorrectly derived footnotes talking about the 5% requirement in car parks - which in itself is actually misleading, and indeed inaccurate.	Paragraph 3.14 specifically talks about parking for people with disabilities. However, this has been expanded to include further detail.
HADAG	There is no actual 'guidance' with respect to accessible parking spaces with the exception of the 5% requirement.	See comments above.
HADAG	<p>The document would appear to set targets for disabled parking down to the individual development level, potentially each store with a car-park. You'll see below my observation that this runs against Building Controls guidance – causing a ready made conflict.</p> <p>The document places planning for accessible parking spaces at the micro-level, e.g. each development, without considering the overall needs of the area. To my observation, neither Waterlooville, Havant, Leigh Park nor Emsworth have sufficient accessible parking for the mean number of daily disabled visitors. Consider the following table which is drawn from BS 8300 and part M.<sup>2</sup></p>	<p>It is considered that providing targets for disabled parking on individual developments ensures that new developments are accessible to all.</p> <p>It is beyond the remit of this SPD to look at existing parking provision in different areas of the Borough. Furthermore, we do not have the necessary evidence to support having higher accessible parking requirements in particular areas.</p> <p>It should also be noted that the table referred to does not appear in the current edition of Part M (2015 edition).</p>
HADAG	<p>Additionally, Part 'M' makes very specific requirements for setting down and picking up spaces, for disabled passengers of vehicles, something not mentioned at all in your document.</p> <p>We accept that there is a disconnect between Building Regulations, BS8300 and planning regulations, however we</p>	<p>A new section on drop-off spaces has been included (paragraph 4.19).</p> <p>It is not possible to address the disconnect between planning regulations and building regulations in this SPD. However, a revised Integrated Impact Assessment will be undertaken to ensure that the council</p>

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Car Park used for	Car Park Size	
	Up to 200 Bays	Over 200 Bays
Employees and visitors to business premises	Individual bays for each disabled employee plus 2 bays or 5% of total car park whichever is greater	6 bays plus 2% of car park capacity
Shopping, recreation and leisure	3 bays or 6% of total capacity whichever is greater	4 bays plus 4% of total capacity



	<p>believe that with view to both the Equality Act (2010) and the Public Sector Equality Duty (2011) the Council should be making considerable effort to harmonise the different regulations, by aligning them, not adding more confusion.</p> <p>Additionally, the problem of ensuring adequate accessible spaces for each primary shopping area should be addressed in parallel through changes to the area specific SPDs.</p> <p>To summarise, the effect of certain aspect of this document will be to introduce conflicting targets on parking than are called for in other legal documents (such as Part 'M') and make strategic objectives of allowing sufficient and properly implemented accessible parking for each area to become impossible.</p>	<p>are fulfilling our duties under the Equality Act and the Public Sector Equality Duty.</p> <p>It is not within the remit of this SPD to look retrospectively at parking provision in existing shopping areas. The SPD seeks to ensure that all new development in the Borough has suitable and adequate parking provision.</p>
Hampshire County Council	<p>Hampshire County Council as the Highway Authority queries some of the details set out in table 5 on page 15. Specifically the details relating to D1 colleges (16+).</p> <p>The Highway Authority is of the opinion that one space for two members of staff is low, especially considering the amount of support staff these educational establishments normally employ alongside teaching staff. The Borough Council may wish to review this.</p> <p>It should also be recognised that many young people ride powered two wheelers / mopeds in order to travel to Further Education colleges. It would seem logical to address this matter directly in table 5 and make specific provision for the parking of such vehicles at Further Education colleges over and above the general requirement for 1 motorcycle space for every 25 car parking spaces which applies across the board.</p>	<p>In terms of the staff car parking, Table 5 has been changed to reflect standards set out in 'On-Site School Parking Guidelines' (2013) prepared by HCC. Regarding motorcycle provision in 16+ educational establishments, more flexibility has been built in. The issue around the use of powered two wheelers/moped at 16+/further education colleges has been flagged up in Note 1 as a consideration to have when producing travel plans.</p>
NHS Property Services	<p>The NHSPS supports the proposed use of a flexible standard for C2 hospitals; however, the proposed prescriptive minimum parking standards for D1 health centres and surgeries is not supported.</p> <p>It seems that there is little evidence for the proposed D1 standards, other than a potentially limited review of the</p>	<p>Agreed that a flexible approach might be best for health centres given the wide range of facilities these can offer. However, the pattern of use and parking requirements for D1 doctors/dentists/veterinary surgeries are more predictable and therefore the standards set out in Table 6 are considered appropriate.</p>

	<p>impact of parking at new developments that were permitted under the old maximum standards since 2002.</p> <p>The Draft SPD should be amended so that D1 health centres and surgeries would be subject to a flexible parking standard that would be arrived at following the submission of a transport statement or assessment. The statement / assessment would act as a proportionate, suitable and robust evidence base, which would be specific to each site and development proposal. Moreover, on account of how widely D1 health centre and surgery uses can vary, it is more appropriate to apply a flexible approach based on individual circumstances, rather than a one-size-fits-all, prescriptive standard. Unlike dwellings houses, which tend to be used in a fairly typical way and therefore have a predictable impact on parking, health centres and surgeries can differ significantly depending on the exact nature of the services provided; this diversity is only likely to increase as the NHS's Five Year Forward View (October 2014) is implemented and new care models that respond to local needs are rolled out.</p>	
PDP Architects	<p>Feel that 1 space per member of staff is excessive for nursing homes. Also, raised concerns about cycle parking.</p>	<p>Note 3 for Table 4C recognises that given the broad range of accommodation available and the varying needs of occupants, the Council will consider parking requirements for older peoples' housing on a case by case basis. We feel this gives sufficient flexibility should 1 space per member of staff be deemed to be excessive.</p>
Langstone Residents Association (1)	<p>Comments received included:</p> <ul style="list-style-type: none"> <li>• Table 2 B8 warehouse cycle long stay - typo - 1 stand per 500sqm</li> <li>• Table 3 Parking for visitors is critically important as public transport to hospitals/clinics in the area may not be available during weekend and evening visiting times.</li> <li>• Table 4A and Table 4B Note 1 for each table - 20% additional parking for visitors is essential, as it will also be used periodically for deliveries, refuse collection and emergency services.</li> </ul>	<ul style="list-style-type: none"> <li>• Table 2 amended accordingly.</li> <li>• Table 3. Comments noted. Visitor parking levels will be based on travel plans on a site by site basis.</li> <li>• Table 4A and 4B. Comments noted.</li> <li>• Table 4C Note 4. The point raised in the second entry for Note 4 is covered by bullet points in the first Note 4 entry. Therefore the second Note 4 can be deleted.</li> <li>• Table 4C. Developments of housing for older people will be assessed on a site by site basis and this would include</li> </ul>

	<ul style="list-style-type: none"> <li>• Table 4C Note 4 - The second entry for Note 4 ("Provision must also...facilities") appears to be included in error and should be deleted. The subject is covered in bullet 9 of the main Note 4</li> <li>• Table 4C Sheltered Housing - The parking requirement for disabled residents here is likely to be greater than the 5% used in other premises.</li> <li>• Table 5 Note 2 - In addition to the scaled car parking spaces (for staff) a substantial off-road/lay-by area is essential for the safe drop-off and collection of children by parents. Failure to provide this will create a serious road safety hazard. See Table 7 Note 2.</li> <li>• Table 7 Note 2 - Comments for Table 5 Note 2 apply here, especially for those care establishments catering for children.</li> <li>• Table 8 Hotels/motels/guest houses etc. and eating and drinking establishments - The car parking standard must include further provision for staff parking. (Failure to do so will result in customer overspill parking problems, as suffered around the Langbrook Farm pub/restaurant.)</li> </ul>	<p>looking at how much disabled parking is appropriate.</p> <ul style="list-style-type: none"> <li>• Table 5 Note 2. Comments noted. Note added that requires drop off space as in Table 7 Note 2.</li> <li>• Table 7 Note 2. Provision is made for drop off space.</li> <li>• Table 8. The parking standards are considered to be sufficient to allow for staff car parking. Also, parking problems previously have been the result of maximum car parking standards. This SPD sets out minimum car parking standards to ensure these problems are not repeated.</li> </ul>
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**Additional Information Relating to Parking Standards**

<p>Langstone Residents Association (1)</p>	<p>Comments received included:</p> <ul style="list-style-type: none"> <li>• 3.01 It is suggested that the following text is added to ensure the document's remit is entirely clear: "Note that this document defines parking spaces to be provided for residents/staff of houses/businesses in town centres. Public car parking standards for visitors/customers are defined elsewhere.</li> <li>• 3.05 Notwithstanding reduced parking standards authorised by this paragraph town centre developments must include sufficient parking for disabled residents/staff as in 3.14.</li> <li>• 3.10 The SSE development in Penner Road is a typical example of the problems cause by insufficient provision of on-</li> </ul>	<p>3.01 Comments noted. This paragraph is talking about the different accessibility of areas and how this effects parking requirements. Visitor parking is taken account of in each section relating to different types of developments.</p> <p>Paragraph 3.05 has been amended to require that parking for people with disabilities is still provided in Havant and Waterlooville centres.</p> <p>3.10 Comments noted.</p>
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	site parking.	
Langstone Residents Association (2)	<p>Comments received included:</p> <ul style="list-style-type: none"> <li>• Clause 3.10 - details of the 'case studies' would be interesting.</li> <li>• Clause 3.11 - this expresses a subjective judgement open to challenge.</li> </ul>	It is felt that the inclusion of case studies in the SPD would add a lot of additional information which would make the document longer than necessary and less user-friendly. Paragraph 3.11 has been deleted.
<b>Design and Layout of Parking Spaces</b>		
Hampshire County Council	<p>Hampshire County Council Environmental Strategy team considers that the SPD could adopt a more Havant-specific approach to the proposals for dealing with electric vehicles.</p> <p>The National policy backdrop for electric Vehicles set out in the NPPF is strengthened by the vision set out in Office of Low Emission Vehicles strategy documents including: The Plug-In Vehicle Infrastructure Strategy <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3986/plug-in-vehicle-infrastructure-strategy.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3986/plug-in-vehicle-infrastructure-strategy.pdf</a> This and other relevant documents could helpfully be referenced in the SPD. This could be through the inclusion of a 'Where else to look' text box in this section of the SPD similar to the approach used elsewhere in the document.</p> <p>The Council should seek to identify information on electric vehicle use specific to Havant Borough and for the full period of the parking strategy rather than relying on national data and snapshots in time. This information can be derived from the national data and should include:</p> <p>The proportion of current EV registrations in Havant The projected national EV ownership within the life cycle of the parking strategy The proportion of new vehicles which will be electric (nationally and within Havant) The types of EV vehicles projected to be taken up (domestic/commercial/fleet)</p> <p>This could then be followed by an assessment of:</p> <p>The need of different types of electric vehicle infrastructure for Havant for the</p>	<p>Comments noted. Paragraph 4.20 is rather negative in respect of encouraging the use of electric vehicles and as such has been removed. Paragraph 4.22 which makes reference to the Code for Sustainable Homes has also been removed. Whilst we don't have data on electric vehicle registrations in the Borough, we have taken a more positive approach by making reference to garages and car ports having home charging points or electric sockets where possible (paragraph 4.20). The Plug-In Vehicle Infrastructure Strategy has also been signposted.</p>

	<p>period of the strategy (domestic/communal/park houses/offices/ fleet etc.)</p> <p>Who will be responsible for electric vehicle infrastructure in areas other than domestic dwellings?</p> <p>Hampshire County Council Environmental Strategy team also would like to point out that the Code for sustainable Homes has been withdrawn by Government and these matters are now expected to be dealt with through building standards. For further details on this see: <a href="http://www.bre.co.uk/page.jsp?id=3442">http://www.bre.co.uk/page.jsp?id=3442</a></p>	
Langstone Residents Association (1)	<p>Comments received included:</p> <ul style="list-style-type: none"> <li>• 4.06 This paragraph should be reworded. A parking space 2.4m wide does not allow for opening parked car doors without risk of damage to adjacent vehicles, and modern SUV-type cars aggravate the problem, 3m wide should be a minimum for the reasons explained in 4.09.</li> <li>• 4.20 These figures may be misleading and obsolete in the future. Electric/hybrid vehicle use is increasing steadily due to improved technology and road tax preference.</li> <li>• Table 4.0 Whilst Note 1 may be true; developers will use the figures in Table 4.0 to minimize space allocated to parking in their designs. The figures 2.4 in Table 4.0 should be increased to 3.0, as in the comment above on paragraph 4.06. Note 1 should be deleted.</li> <li>• 4.41 Whilst the statement that shared parking is a more flexible and efficient use of space, this must not be used as a reason for developers to provide less than the minimum parking standards in Tables 1-9. The problems caused by the SSE development in Penner Road are a case in point. It is suggested that paragraph 4.41 is deleted in toto.</li> </ul>	<ul style="list-style-type: none"> <li>• 4.06 Comments noted. The parking space size standards are minimums and there is a requirement to provide space for car doors to be opened and car boots to be accessed.</li> <li>• 4.20 Any statistics published will become out of date eventually. We can only use the information available to us currently and the SPD will be reviewed in the future.</li> <li>• Table 4. Paragraph 4.06 requires that space is provided for car doors opening and car boot access</li> <li>• 4.41 Problems with parking on developments in the past have been the product of maximum parking standards. Other than in the most highly accessible locations, all the standards referred to in this document are minimum standards.</li> </ul>
Langstone Residents Association (2)	<p>Comments received included:</p> <ul style="list-style-type: none"> <li>• Concerns regarding garages in that they are often used for storage and are too small to be</li> </ul>	<p>The garage size standards set out in paragraph 4.09 are considered to be sufficient that a modern car can be accommodated with additional space</p>

	<p>accessed by modern vehicles.</p> <ul style="list-style-type: none"> <li>Better guidance needed on the size of car parking spaces as the standards used are outdated.</li> </ul>	<p>for storage. Garages that do not meet these size requirements will not be counted towards parking provision.</p> <p>The car parking size standards are minimum. Paragraph 4.06 requires that space is provided for car doors opening and car boot access.</p>
PDP Architecture	<p>6m x 6m for a double garage is very generous when 5.6m wide would be sufficient for two cars. The 6 meter depth should only be required if cycle storage is also being provided, as if the garage was integral the storage might not be required as it could be provided elsewhere i.e. a shed in the garden.</p>	<p>The width standards are considered necessary to accommodate modern vehicles with sufficient space down the side to allow access in addition to cycle storage. Garages that do not meet this size standard will not be counted towards the parking provision.</p>
<b>Cycle Comments</b>		
Mr Denyer	<p>A single standard of 1 space per one bedroom dwelling, 2 spaces for 2+ bedroom dwellings is proposed for residents together with 1 space/dwelling for visitors/short stay, brought forward from the March 2010 SPD. Notably the sentence 'For large flatted developments a reduction in the cycle parking/storage provision standards may be acceptable' in the March 2010 SPD has been dropped from this draft. Although there can be little argument against encouraging cycling and proper provision should be made for secure cycle storage there should be some flexibility in cycle parking/storage provision for residents depending on whether the provision is allocated or communal. Provided that what is being provided is of good quality (not simply making the best of a space that otherwise would have no use or value). If cycling is to be encouraged, as with cycling infrastructure, quality is at least as important as quantity.</p>	<p>The long-term secure parking standards have been carried over from the previous SPD as they are still considered to be appropriate. It should be noted that separate cycle storage would not need to be provided where there is a garage meeting the size requirements set out in Paragraph 4.09. Visitor cycle parking should be unallocated (see Paragraph 4.15) which provides flexibility.</p>
Mr Denyer	<p>In respect of short stay cycle parking provision, it is to no-one's benefit to provide a sea of Sheffield racks within developments and perhaps a lower standard would generally be more – Portsmouth has recently revised its car and cycle parking standards as 'Visitor cycle spaces will be expected at 10% of the long stay spaces in developments of 10 units or more'. This would seem much more reasonable – as set out in the draft the standards require that for every two new dwellings in the Borough there should be a Sheffield rack for short stay/visitor use.</p>	<p>Agreed. The visitor cycle standards in table 4D conflict with Paragraph 4.15 which states that 'an allowance of 20% should be made for visitor parking'. Therefore the visitor cycle parking requirement has been reduced to 20% of the long-stay requirement and only applied to developments of more than 10 dwellings.</p>
HADAG	<p>Some of the requirements are</p>	<p>Cycle storage will not need to be</p>

	<p>especially onerous on the average householder, especially the requirement that every house has 'cycle storage' built separately.</p>	<p>provided separately where there is a garage meeting the size standards set out in Paragraph 4.09. The requirements for visitor cycle provision have also been revised.</p>
HADAG	<p>It is interesting, and we often find hilarious, that you insist on the requirement for cycle storage and parking within developments for the elderly and resident/nursing homes. A fully 'inclusive' document would substitute 'wheelchair/scooter charging bays' for 'cycle storage' where appropriate. In this respect, the document fails the PSED test as it totally fails to promote inclusion.</p> <p>Again, you fail to consider the full range of members of the community as there is no consideration of storage for, or charging of, electric scooters or wheelchairs.</p>	<p>Housing for older people can vary considerably in terms of the range of need that its inhabitants may require. Whilst somebody requiring a C2 care home type facility is unlikely to cycle, some of the other retirement housing complexes have very limited 'care', in which case residents are more likely to be active and may well cycle. There is also a requirement for cycle provision for staff and visitors. Note 3 to Table 3 also makes it clear that given the broad range of accommodation available and the varying needs of occupants the Council will consider the parking requirements of older persons housing on a case by case basis, this will enable cycle provision to be considered at the same time.</p> <p>Paragraph 4.23 states that electric charging points and parking for mobility scooters should be provided in new residential developments in a convenient location at ground floor level where possible. Furthermore, paragraph 4.2 has been amended to encourage the provision of home charging points or electric sockets in garages where possible which would allow for the charging and storage of mobility scooters.</p>
HADAG	<p>Worse still, the document places an obligation on builders of even single homes to build yet another brick-built construction to satisfy the cycle storage requirement, even if they already have a garage.</p> <p>We would propose that the requirements for cycle storage and those for appropriate power installations for electric cars be merged together, and within the same guidance, merge the cycle storage requirement with one for wheelchair or mobility scooter storage and charging, and allow the use of garage space for the purpose, even if subjected to mandatory increase in floor space. This would present a fair more equitable and achievable requirement across all types of development. Simply forcing the construction of cycle storage will</p>	<p>Individual houses with garages that meet the size requirements set out in Paragraph 4.09 will not require additional cycle storage. Paragraph 4.12 has been amended to make that clear.</p> <p>The requirements for cycle storage and those for appropriate power installations for electric cars are very different in nature and can't easily be combined.</p> <p>Paragraph 4.23 states that electric charging points and parking for mobility scooters should be provided in new residential developments in a convenient location at ground floor level where possible. Furthermore, paragraph 4.2 has been amended to encourage the provision of home charging points or electric sockets in</p>

	not force residents to ride bicycles, even if they are able.	garages where possible which would allow for the charging and storage of mobility scooters.
PDP Architects	The visitor cycle loop requirement is excessive.	Agreed. Table 4D has been amended. Short-term visitor parking for cycles will only be required on larger developments (Schemes of 10 or more residential units) and should be provided at 20% of the long-term cycle parking standard.
<b>Appendix</b>		
Langstone Residents Association (1)	As Havant Borough is shown to have higher levels of car ownership/use than nationally, a worst case requirement should be used if this document is intended for forward planning. Table A3 should therefore be deleted.	Car ownership levels have been taken into account when devising the parking standards. Table A3 demonstrates that even if car ownership levels in the borough increase by 20% the residential parking standards would still be appropriate which is useful to know.
<b>Integrated Impact Assessment</b>		
HADAG	There are a number of problems with the document, including the lack of equality impact statement, and the failure to consider the Public Sector Equality Duty to encourage the reduction of discrimination and promote inclusion of those with protected characteristics.	An Integrated Impact Assessment was carried out; however, this will be reviewed to ensure that it is robust.
HADAG	The document should have been subjected to a full equality impact statement assessment, not just an 'integrated assessment' because there are clear equality issues here which conflict with the current legal environment.	The Integrated Impact Assessment fulfils our obligations under the Equalities Act. However, it will be reviewed to ensure that it is robust.
HADAG	<p>The Integrated Impact Assessment makes a vast number of assumptions as to equality and inclusion which are not supported in any section of the document, particularly sections 5-8. Stating that all feedback will be considered is not the way such assessments should be carried out, the impact against the set criteria should be assessed first, and then validated against feedback.</p> <p>I further note that there is not a single negative result, and that surprisingly, an equality impact statement was signed off as not required which is, I am sorry to say, very difficult to support as no representative groups were consulted during the creation of this document to support that view, and I do not recognise either of the impact assessment document authors as being involved regularly in either disability OR equality matters.</p>	As above, the Integrated Impact Assessment will be reviewed to ensure that it is robust.