

Planning Policy Dept
East Hampshire District Council
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Sent by Email: localplan@easthants.gov.uk

29 January 2018

Dear Sir/Madam

Response to Consultation on Draft Vehicle Parking Standards Supplementary Planning Document (SPD)

Cllrs Lee and Wilson reviewed the above document and comment as follows, on behalf of Rowlands Castle Parish Council:

General Comments

The SPD appears well-argued and sound, recognising that policy by itself will not bring about lower car use in a rural location with essentially minimal public transport alternatives.

Section 3 - Parking Standards: Accessibility Opportunities for Public Transport

Rail The station in Rowlands Castle may be accessible but it has very limited parking provision and many users park in the surrounding area instead. With reference to paras 3.1.2 and 3.1.3, the train service is not sufficient to allow for less parking than the minimum standard; there may even be a future reduction in the train service. We are keen for the station to remain viable and this requires sufficient parking.

Bus The reference in para 3.1.8 to bus routes to Havant, Emsworth and beyond is misleading. There is only one bus route, running at two-hourly intervals, with just 5 daily buses from Monday to Saturday. The service does not warrant inclusion in the SPD.

Education Establishments The minimum car parking requirements for visitors (p19/20) should be much more prescriptive and quantifiable than the proposed text "...This will be considered on a case by case basis, balancing managing the impact of parking on the local road network with encouraging sustainable modes of transport..." It is surprising that the safety of children is not referred to as a consideration. 'Visitors' include parents/carers dropping-off and picking up children. Therefore, the dangers and risks of parking on local roads when doing so should be a consideration. Greater reference should also be made to HCC's On-site School Parking Guidelines of April 2013, from which EHDC appears to have taken various details for its SPD.

Section 4 – Size, Layout & Design of Parking Spaces

We support proposals on layout / design in order to encourage as much off-road, and particularly off-pavement, parking. However sufficient green space for environmental as well as drainage reasons is also necessary.

From our local experience, more trade vehicles are now being parked at home rather than in commercial premises. The spacing requirements must inevitably be very different (para 4.1.2) when comparing a small car and a transit van or equivalent. The SPD refers to "EHDC having a high proportion of households with 2 or more cars or vans.." (para 2.5.3). More attention needs to be paid to this issue as larger vans change the 'street scene' of road and/or housing developments. Often,

this situation is not a case of business owners bringing their own commercial vehicle(s) home but an increasing practice of larger companies eg SSE or Solent Groundworks Ltd seemingly encouraging their workers to park their company vehicles at home. It may well suit employees to do as it saves them having to drive and/or own their own vehicle but the practice has a 'knock-on' effect of the surrounding area.

Section 5 – Types of Parking

Electric Vehicles We support the provision for future increased use of electric vehicles and the parking standards for larger developments (p11 and 5.6).

HGVs We support the provision of HGV parking (para 5.10) where necessary for deliveries to appropriate new commercial/retail developments.

Section 7 – Travel Plans, Transport Assessments and Travel Statements

We would suggest the title of this section be amended to 'Transport' rather than 'Travel' Statements because that is the terminology used throughout the rest of the section. The standardisation of terminology throughout avoids confusion.

We acknowledge the significant housing need. We are also aware of the additional requirements in a Transport Assessment (TA) as opposed to a Transport Statement (TS) and the cost implications thereon. We are aware that standards concerning TAs and TSs are set by the local Highway Authority so may not be immediately relevant to this consultation. However, we also note the extract below from Govt guidance linked from EHDC's website:

Travel Plans, Transport Assessments and Statements - March 2014 ***When are Transport Assessment and Transport Statements required?***

In determining whether a Transport Assessment or Statement will be needed for a proposed development local planning authorities should take into account the following considerations:

- *the Transport Assessment and Statement policies (if any) of the Local Plan;*
- *the scale of the proposed development and its potential for additional trip generation*
- ***the cumulative impacts of multiple developments within a particular area;***

From local experience we believe the threshold for requiring a TA should be lower than 50 residential units (para 7.1.5) and would suggest 30 units instead for any one development or, where there are adjacent development proposals, a combined threshold of 30 units.

The statistical evidence in Appendix 1 suggests that in East Hampshire District, 11% of households have no car, 37% have 1, 37% have 2 and 15% have 3+ cars. Using the example of a 30-unit development, we would expect c 10 units to have 1 car, 10 units to have 2 cars and 5 units to have 3+ cars, making a total of c 45 cars. This is a sizeable total given that most on the road during rush hour. We appreciate the costs involved in producing such an assessment but believe this is a key issue given the increasing pressure on infrastructure.

In future, TAs should take account of traffic impacts over a wider area than they do at present. They should not only consider 'committed' developments but also others for which planning applications have been submitted, but not yet approved. For example, the TA for the proposed Land East of Horndean Development (EHDC Ref 55562) did not consider any traffic impacts on nearby Rowlands Castle, especially the strategically important mini-roundabout system. Traffic volumes are invariably assessed only on roads linking the proposed development with key arterial roads - in this case primarily the A3/A3(M).

Thank you for the opportunity to comment upon this Consultation.

Yours faithfully



Lisa Walker
Clerk to Rowlands Castle Parish Council