

## Comment

Consultee	Mr Peter Tanner (1218324)
Email Address	[REDACTED]
Company / Organisation	Renaissance Retirement Ltd
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Arun Parking Standards
Comment by	Renaissance Retirement Ltd (Mr Peter Tanner - 1218324)
Comment ID	PS SPD3
Response Date	02/07/19 17:06
Consultation Point	Arun Parking Standards ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1

**Are there any other factors that should influence the application of the standards?** Yes

### Please detail your response in the box below

The recommended levels of cycle provision make no reference or allowance for provision in respect of proposals for sheltered housing for the elderly or other forms of retirement housing. Within such developments the need for cycle space provision is significantly lower than that for general residential developments. Accordingly, I suggested that the cycle space standards should reflect this. It is suggested that the provision of cycle storage should be provided in sheltered housing developments at about 1 cycle space per 5 sheltered units. This is based on our extensive experience of providing for the needs of residents and their visitors on our numerous existing developments.

## Comment

Consultee	Mr Peter Tanner (1218324)
Email Address	[REDACTED]
Company / Organisation	Renaissance Retirement Ltd
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Arun Parking Standards
Comment by	Renaissance Retirement Ltd (Mr Peter Tanner - 1218324)
Comment ID	PS SPD4
Response Date	02/07/19 17:11
Consultation Point	Arun Parking Standards ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1

**Are there any other factors that should influence the application of the standards?** Yes

### Please detail your response in the box below

The residential parking standards make no reference to provision in respect of proposals for sheltered housing for the elderly or other forms of specialist retirement housing. Within schemes for sheltered housing for the elderly (where the age of occupier is typically 79 years of age or older) car ownership is significantly lower than that associated with other forms of residential development. Accordingly, I suggest that the parking space standards should reflect this. It is suggested that the provision of 1 parking space for every 2 sheltered units would be adequate to serve the likely needs of elderly residents and their visitors. This is based on our extensive experience of providing for the parking needs of residents and their visitors on our numerous sites and of experience of other sheltered housing providers.

## Comment

Consultee	Mr Tony Cross (1099216)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Arun Parking Standards
Comment by	Mr Tony Cross (1099216)
Comment ID	PS SPD5
Response Date	08/07/19 13:34
Consultation Point	Table 2.2 Electric Vehicle Charging Points Requirements ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Which part of the document does your comment relate to?	Paragraph No.
Are you?	Commenting
Do you have any evidence to support your comment?	Yes
Are there any other factors that should influence the application of the standards?	N/A

### Please detail your response in the box below

2.10 Principles of Development. We should seek to avoid parking spaces on new developments where they provide a single garage and two parking spaces inline on the driveway. If you look at the actual effects of this design, you will see that where the occupants have two cars, the second car is often parked on the road outside the house. This is because of the inconvenience of having to juggle the cars around. We should insist upon a double width driveway at least, if not a double garage.

## Comment

Consultee	Mr Derrick Chester (1219271)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Arun Parking Standards
Comment by	Mr Derrick Chester (1219271)
Comment ID	PS SPD6
Response Date	13/07/19 00:33
Consultation Point	Table 2.3 Recommended levels of cycle provision ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Are you?	Commenting
Do you have any evidence to support your comment?	N/A
Are there any other factors that should influence the application of the standards?	Yes

### Please detail your response in the box below

Should there be a defined size for a parking space as well for a garage? Some spaces are far too small.

Should guidance be issued on retraining future conversions of garages or parking spaces to extensions or conversions to habitable rooms? Where a space may have contributed towards the overall total a future conversion undermines that sensible planning.

## Comment

Consultee	Mr Derrick Chester (1219271)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Arun Parking Standards
Comment by	Mr Derrick Chester (1219271)
Comment ID	PS SPD7
Response Date	13/07/19 00:33
Consultation Point	3 Residential Parking Guidance ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3
Are you?	Commenting
Do you have any evidence to support your comment?	N/A
Are there any other factors that should influence the application of the standards?	Yes

### Please detail your response in the box below

Zones that are defined as having a lesser requirement for parking are by definition being given the opportunity to develop at a higher density. Reflecting this thought should be given as to whether in these cases a contribution towards a sustainable transport initiative should be made instead. It is important to understand that what is regarded as sustainable transport provision in Brighton or London is very different from here. Buses do not run late evening. Train services are infrequent off peak. Employment sites are often located in locations without public transport. It is possible the policy will mean that neighbouring roads will become under more pressure rendering the only practical way to manage the situation a controlled parking zone, and perhaps developments should be required to fund these.



Historic England

Planning Policy & Conservation Team  
Arun Civic Centre,  
Maltravers Road,  
Littlehampton,  
West Sussex, BN17 5LF

Our ref: PL00598569  
Your ref:  
Telephone 020 7973 3700  
Email [e-seast@historicengland.org.uk](mailto:e-seast@historicengland.org.uk)

By email only to [localplan@arun.gov.uk](mailto:localplan@arun.gov.uk)

Date 18 July 2019

Dear Sir or Madam

### Arun Parking Standards Supplementary Planning Document

Thank you for your email of 9 July 2019 inviting comments on the above document.

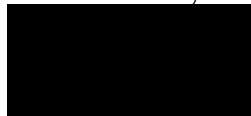
As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process, and welcomes the opportunity to comment upon this planning document.

Historic England's has no specific comments to make on the above document that deals with matters outside its remit and area of expertise.

Historic England would strongly advise that the Council's own conservation staff are closely involved in the preparation of the guidance, as they are often best placed to advise on local historic environment issues and priorities, and consideration of the options relating to any effects there may be heritage assets.

These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.

Yours sincerely



*Alan Byrne*  
Historic Environment Planning Adviser



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
Telephone 020 7973 3700 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



## Comment

<b>Consultee</b>	Ferring Parish Council (871322)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Ferring Parish Council
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Arun Parking Standards
<b>Comment by</b>	Ferring Parish Council ( Ferring Parish Council - 871322)
<b>Comment ID</b>	PS SPD11
<b>Response Date</b>	18/07/19 08:03
<b>Consultation Point</b>	Arun Parking Standards ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.6
<b>Are you?</b>	Commenting

### Please detail your response in the box below

In response to the 'Arun Parking Standards' and 'Public Open Space' Supplementary Planning Documents Consultation 2019, Ferring Parish Council notes the contents of the consultation and acknowledges that there are no sites identified in Ferring or the surrounding area. Ferring Parish Council therefore has no further comment.

## Comment

<b>Consultee</b>	Mr Simon Cross (758601)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	East Preston Parish Council
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Arun Parking Standards
<b>Comment by</b>	East Preston Parish Council (Mr Simon Cross - 758601)
<b>Comment ID</b>	PS SPD12
<b>Response Date</b>	30/07/19 08:29
<b>Consultation Point</b>	Table 3.1 Expected level of provision for new residential dwellings ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3
<b>Which part of the document does your comment relate to?</b>	Table No.
<b>Are you?</b>	Commenting
<b>Do you have any evidence to support your comment?</b>	N/A
<b>Are there any other factors that should influence the application of the standards?</b>	N/A

### Please detail your response in the box below

As a Parish Council in Zone 2, peri-rural, we do not feel the draft SPD reflects the reality of modern households.

We feel the proposed figures for any property above a single bedroom will be totally inadequate. In the current, long-standing economic climate, particularly in the south-east, it is not possible for adult children to leave home as early as they may have in the past. Consequently, they are still living at home but may well need a car for work, adding to the number of cars at a property. Add in partners and the number of cars attached to a property has very quickly gone above the proposals in the table.



The roads in peri-rural villages were not designed with ever-increasing numbers of vehicles in mind. Insufficient provision of parking spaces just adds to the problems in and around our villages.

This council feels providing garages as parking spaces is self-defeating. For a number of reasons, many households do not use their garages as parking spaces. Therefore a parking space is lost before you have started. If the footprint of a garage was left as driveway, it would more likely be used for parking.

Are the figures in the table a minimum or maximum provision?

## Comment

Consultee	Mrs Juliet Harris (1193938)
Email Address	[REDACTED]
Company / Organisation	Littlehampton Town Council
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Arun Parking Standards
Comment by	Littlehampton Town Council (Mrs Juliet Harris - 1193938)
Comment ID	PS SPD13
Response Date	30/07/19 11:00
Consultation Point	Table 3.1 Expected level of provision for new residential dwellings ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3
Which part of the document does your comment relate to?	Table No.
Are you?	Commenting
Do you have any evidence to support your comment?	No
Are there any other factors that should influence the application of the standards?	Yes

### Please detail your response in the box below

Littlehampton Town Council Comments:

The potential for exploiting sustainable transport needs to be balanced with the increase in car ownership in recent years.

Parking provision in Town Centres needs to acknowledge the growing need for public parking to accommodate visitors and the growth in the development of flats in these areas.

Provision also needs to acknowledge the proximity of other facilities such as education establishments and transport hubs which generate parking needs in their own right.

The guidance states garage sizes but not sizes for parking bays. These need to be sufficient to accommodate larger vehicle sizes (4x4's & SUVs)

Provision needs to take into consideration the growing trend in dropped curbs which whilst it indicates a move to provision of off street parking (by the loss of front gardens) does reduce the availability of on street parking.

## **Arun District Council - Arun Parking Standards Supplementary Planning Document Consultation**

### **Informal WSCC Comments July 2019**

#### **General Comments**

As a general point it is noted that the SPD does not make consistent reference to the draft West Sussex County Council Guidance on Parking at New Developments May 2019.

**Tables:** It is also noted that figures have been rounded up or down to whole numbers rather than using the values in the West Sussex Guidance on Parking at New Developments May 2019 (Guidance on Parking). If this is the approach it should be made clear in the SPD, as the numbers are not consistent with the Guidance on Parking and may lead to confusion. It would be preferable if the SPD uses the same numbers as the Guidance on Parking.

#### **Detailed Comments**

**Paragraphs 1.1:** this should be updated to refer to the draft West Sussex County Council Guidance on Parking at New Developments May 2019 which outlines the County Council's approach to parking at new developments (both residential and non-residential).

**Paragraph 2.5:** this needs to be made clear which standards this is referring to, suggested amendment below (this is assuming the paragraph is referring to Table 2.1):

'Where a development includes the delivery of parking spaces which are on-street (e.g. estate renewal schemes), Electric Vehicle charge points should be delivered to the same standard as those set out in **Table 2.1.**'

**Paragraph 2.6:** this statement needs to be quantified ie when, why and what circumstances.

**Table 2.2 Electric Vehicle Charging Points Requirements:** Is not consistent with the draft West Sussex County Council Guidance on Parking at New Developments May 2019 Appendix B and should be amended as follows:

- 2023:41%
- 2028:62%
- 2033: This should not be included as this year is not projected in the draft West Sussex County Council Guidance on Parking at New Developments May 2019 Appendix B

**Paragraph 2.14 Principle 3:** this should be amended as follows, to reflect the draft West Sussex County Council Guidance on Parking at New Developments May 2019 Appendix B:

'Active' charging points for electric vehicles shall be provided at ~~20%~~ **24%** (at 2019 levels of provision) ....'

**Paragraph 2.17a Principle 6:** this should be amended as follows, to reflect the draft West Sussex County Council Guidance on Parking at New Developments May 2019 paragraph 4.14a:

'Providing garages of sufficient size at new residential developments - If garages are provided they should be at least 6m x 3m internally. If garages meet this requirement, they will be regarded as an allocated parking space of  $\pm$  **0.5** and calculations of parking demand will take this into account.'

**Table 2.3:** Consequently, this will need to be amended to as follows:

Flats	Up to 3 rooms (1 & 2 bed)	<b>0.5 space</b> (if communal storage otherwise same as 1 & 2 bed house)
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**Paragraph 2.17c Principle 6:** reference is made to Table 2 – should this read Table 2.3?

**Paragraph 3.1:** reference is made to Table 3 – should this read Table 3.1?

**Table 3.1:** It is noted that Zone 5 is struck through for deletion. This is welcomed as there are no Zone 5 Parking Behaviour Zones in Arun. However the general comment above about rounding numbers applies to this table. It is suggested that the table is amended to reflect the West Sussex County Council Guidance on Parking at New Developments May 2019.

**Table 4.1 User Class D2 Assembly and Leisure:** this table should be amended to reflect the draft West Sussex County Council Guidance on Parking at New Developments May 2019. It is queried why reference is made to 'As these are D2 uses, those standards should be applied (Part A)' in the table?

## Comment

Consultee	WSCC Planning Policy Infrastructure (1220484)
Email Address	[REDACTED]
Company / Organisation	WSCC
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Arun Parking Standards
Comment by	WSCC ( WSCC Planning Policy Infrastructure - 1220484)
Comment ID	PS SPD14
Response Date	26/07/19 08:28
Consultation Point	Arun District Council Parking Standards SPD ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.6
Files	<a href="#">WSCC comments to ADC Parking Standards SPD FINAL.docx</a>
Which part of the document does your comment relate to?	Paragraph No.
Are you?	Commenting
Do you have any evidence to support your comment?	Yes
Are there any other factors that should influence the application of the standards?	No

### Please detail your response in the box below

Please see attached letter

The informal relates to them not going through a committee process. WSCC are happy for these officer comments to be published.

## Comment

Agent	Ian York (1150901)
Email Address	[REDACTED]
Company / Organisation	Lichfields
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	(1150908)
Company / Organisation	Bourne Leisure
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Arun Parking Standards
Comment by	Bourne Leisure ( - 1150908)
Comment ID	PS SPD15
Response Date	30/07/19 15:13
Consultation Point	Table 2.2 Electric Vehicle Charging Points Requirements ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Which part of the document does your comment relate to?	Table No.
Are you?	Objecting
Do you have any evidence to support your comment?	Yes
Are there any other factors that should influence the application of the standards?	Yes

### Please detail your response in the box below

By way of background to these representations, Bourne Leisure operates more than 50 holiday sites in Great Britain in the form of holiday parks, family entertainment resorts and hotels, and is a significant

contributor to the national tourist economy, as well as local visitor economies. Within Arun, Bourne Leisure operates Church Farm Holiday Village and Butlins Bognor Regis.

Bourne Leisure is committed to reducing its carbon emissions across all its hotels, parks and resorts. Between 2012 and 2018 Bourne Leisure reduced its CRC emissions by 45%. It is also ensuring that for new and upgraded facilities low carbon infrastructure and systems form an important part of delivering its objectives.

Table 2.2 of the draft SPD sets out the proposed minimum standards for Electric Vehicle Charging Points (EVCP). The table proposes that active charging points for electric vehicles shall be sought at 20% (at 2019 levels of provision) rising to 30% in 2023.

Policy QE DM3 of the Arun Local Plan (July 2018) seeks to encourage the use of electric vehicle charging points and does not set minimum standards. As such Bourne Leisure considers that a flexible approach is required and is appropriate when applying the proposed standards to tourist accommodation such as holiday resorts and parks. This is particularly the case where a significantly increased demand upon national grid system would be required (even for the lowest 7kw trickle chargers) compared to the Park's existing demands. It is therefore important that there is sufficient flexibility in the emerging standards to recognise that such increases may not be possible to achieve.

Further, flexibility should also apply to the location of the proposed EV charging points. Bourne Leisure considers that at this time, EVCPs are more suitably delivered through a central location (in a dedicated area of the Park), rather than being directly connected to all new development or caravan pitches. This is due to the pressure that a significant number of distributed car charging points would place on existing electrical networks.

To reflect this context, we therefore suggest additional wording to paragraph 2.7, as below:

"2.7 (...) As a result of evidence gathered by WSCC through their review of their draft Parking Standards, it is proposed to adopt the following minimum standards **for new development** in this SPD. ***These standards should be used as a guide for developers and will be assessed on a case-by-case basis.***"



## Comment

Consultee	Mrs Kathryn Herr (1186317)
Email Address	[REDACTED]
Company / Organisation	Angmering Parish Council
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Arun Parking Standards
Comment by	Angmering Parish Council (Mrs Kathryn Herr - 1186317)
Comment ID	PS SPD16
Response Date	24/07/19 14:55
Consultation Point	3 Residential Parking Guidance ( <a href="#">View</a> )
Status	Submitted
Submission Type	Email
Version	0.2
Which part of the document does your comment relate to?	Paragraph No.
Are you?	Objecting
Do you have any evidence to support your comment?	Yes
Are there any other factors that should influence the application of the standards?	Yes

### Please detail your response in the box below

Parking spaces need to be increased per house in new developments – Angmering evidence shows a higher number of commuters than average.

Road width of new developments – increasingly difficult to get emergency vehicles through with parked cars either side.

Visitor parking – effects the above comment also – this is often overlooked/under provided in new applications.

Increase in cycle lane provision to help with all of the above.

## Comment

Consultee	Mrs M Boulton (615206)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Arun Parking Standards
Comment by	Mrs M Boulton (615206)
Comment ID	PS SPD17
Response Date	25/07/19 09:30
Consultation Point	Arun Parking Standards ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
Version	0.4
Are you?	Commenting
Do you have any evidence to support your comment?	No
Are there any other factors that should influence the application of the standards?	No

### Please detail your response in the box below

We are fortunate enough to live on the Green, L/H. Much used and loved by local residents and visitors alike. It is essential for the quality of open space that it is maintained.

We are grateful for the way that it is kept clear of litter and in very good condition.

Please look at the situation with regard to the coach park. Very important and occasionally completely full. However other times coach park is empty and cars driving up & down looking for somewhere to park with all the ensuing pollution.

Would it be possible for coaches to drop off passengers & then perhaps park elsewhere on the industrial estate maybe?