



**Draft Cycle and Car Parking in New Development
Supplementary Planning Document
Summary of Representations and Council Response
*Working Draft***

1. Hart District Council consulted on a Draft Cycle and Car Parking in New Development Supplementary Planning Document for six-weeks from 12 May 2023 to 23 June 2023.
2. A total of 23 external responses were received during the consultation period.
3. This document provides, at Table 1, a summary of the representations received and the Council's draft response to each comment made.
4. Table 2 shows other changes to correct or clarify the SPD (very minor changes such as typos are not shown).

Table 1: Summary of Representations and Hart District Council's Draft Response

	Consultee and rep no.	Issue raised	HDC's draft response
1	08 - Winchfield Parish Council 08/01	Winchfield Parish Council (WPC) is concerned that the characteristics of rural parishes may not be reflected in SPD parking standards. In particular, on-street parking is unsuitable in rural areas where the road network is comprised predominantly of narrow lanes.	No change. The guidance is designed to apply across the whole district and to avoid problems of highway safety. The issue of rural lanes, on-street parking and highway safety is picked up at paragraph 5.25 (b).
2	08/02	Paragraph 2.2- Raises concerns that Paragraph 2.2 will ensure that the SPD overrides parking standards in any made neighbourhood plans. Proposes the deletion of the last sentence of this paragraph which refers to the regard that should be given to the age of neighbourhood plans, their consistency with national planning policy and other material considerations.	<p>Agree to delete final sentence and clarify that neighbourhood plan policies will generally take precedence. It should also be clarified that the SPD is a material consideration, and that due weight will be given to neighbourhood plan policies according to their consistency with the National Planning Policy Framework (Planning Practice Guidance Paragraph: 064 Reference ID: 61-064-20190315, Revision date: 15 03 2019).</p> <p><u>2.2 This SPD provides district-wide guidance on parking standards and design in support of the local plan policies referred to above. It is a material consideration in the determination of planning applications. In addition, there are several made Neighbourhood Plans across Hart district which form part of the development plan for the area, some of which include parking policies and standards. Made neighbourhood plans form part of the development plan for the area; p</u>Planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. SPDs are a material consideration when determining planning applications. If there is a conflict between a made neighbourhood plan and this SPD, for example there are different standards for the</p>

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		<p>quantum of car parking, the neighbourhood plan policy will generally take precedence. However, regard will be paid to the age of the neighbourhood plan and its degree of consistency with national planning policy and other material considerations such as the Council's declaration of a climate emergency. <u>Due weight will be given to relevant policies in existing plans according to their consistency with the National Planning Policy Framework.</u></p>
3	<p>08/03</p> <p>Paragraph 2.6-Suggests amending the wording of Paragraph 2.6 as shown to ensure that in line with national guidance the SPD gives due regard to opportunities for improving cycle and walking infrastructure set out in neighbourhood plans:</p> <p>“In partnership with Hampshire County Council, Hart has commissioned a Local Cycling and Walking Infrastructure Plan (LCWIP) for Hart district. The purpose of the LCWIP will be to identify opportunities for improved walking and cycling routes thereby increasing active travel and the wider benefits this will bring in terms of reducing emissions, improving air quality and health and wellbeing improvements. This is due to be adopted by the end of 2023. <u>Further regard should also be had to opportunities to improve cycling and walking infrastructure set out in Neighbourhood Plans</u>”.</p>	<p>Amend paragraph 2.6 as follows:</p> <p>In partnership with Hampshire County Council, Hart has commissioned a Local Cycling and Walking Infrastructure Plan (LCWIP) for Hart district. The purpose of the LCWIP will be to identify opportunities for improved walking and cycling routes thereby increasing active travel and the wider benefits this will bring in terms of reducing emissions, improving air quality and health and wellbeing improvements. This is due to be adopted by the end of 2023. <u>The Council will also have regard to opportunities to improve cycling and walking infrastructure identified in Neighbourhood Plans.</u></p>
4	<p>08/04</p> <p>Paragraph 5.6</p> <p>Proposes strengthening the wording as follows:</p> <p>“When a development involves an increase in bedrooms to an existing property this will normally trigger an increase in</p>	<p>No change. As currently drafted the paragraph is clear that such rooms may be treated as bedrooms, but there needs to be room for judgement on a case-by-case basis.</p> <p>Amend 5.6 as follows:</p>

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		<p>the parking requirement at that property. Rooms which could be used as bedrooms but are labelled on plans as office/study/family room <u>may will</u> be treated as bedrooms for the purposes of applying the parking standards <u>unless clear and detailed evidence is submitted to demonstrate that the room will not be used as a bedroom</u>".</p>	<p>5.6 When a development involves an increase in bedrooms to an existing property this will normally trigger an increase in the parking requirement at that property. Rooms which could be used as bedrooms but are labelled on plans as office/study/family room <u>may will</u> be treated as bedrooms for the purposes of applying the parking standards <u>unless it is clear from the planning application and any supporting evidence that the room is unlikely to be used as a bedroom.</u></p>
5	08/05	<p>Paragraph 5.25-To ensure the parking stress assessments set out in paragraph 5.25 meet industry standards, it is suggested that criterion b is amended to require the use of the Lambeth Methodology with additional text setting out the information to be submitted as part of the assessment.</p>	<p>Agree that the SPD would benefit from additional guidance regarding parking stress assessments, drawing on the Lambeth Methodology where it is helpful to do so. This is to be added as a new appendix (Appendix 6)</p> <p>Amend 5.25(b) as follows:</p> <p>Where unallocated parking is to be accommodated on the public highway this should be accompanied by an assessment of the parking stress in the area and the capacity for on-street parking (<u>see paragraph 7.1(4) and Appendix 6</u>). The nature of some roads, for example rural lanes, may mean reliance on on-street parking is inappropriate on highway safety grounds.</p> <p>At paragraph 7.1(4) refer to the new Appendix 6 (para 7.1(4) explains that an assessment of parking stress is required if unallocated vehicle parking is to be accommodated on the highway).</p>
6	08/06	<p>Suggests that the SPD refers to Active Travel England who are now a formal consultee in the planning process.</p>	<p>Agree. Active Travel England became a statutory consultee after the Draft SPD was published for consultation.</p> <p>Add a new paragraph after 2.18:</p>

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			<u>Active Travel England (ATE) is the government's executive agency responsible for making walking, wheeling and cycling the preferred choice for everyone to get around in England. As of 1 June 2023, ATE is officially a statutory consultee on all planning applications for developments equal to or exceeding 150 housing units, 7,500 m² of floorspace or an area of 5 hectares.</u>
7	22 - Ewshot Parish Council 22/01	Ewshot Parish Council is generally supportive of the response submitted by Winchfield Parish Council, particularly that due regard should be given to the fact that rural parishes have unique characteristics which may differ to those of urban areas. As in Ewshot where we are reliant on a small number of narrow lanes to navigate around the village where on-street parking is largely unsuitable as it prevents traffic flowing normally. This means it is very important that adequate provision is made within new development sites for parking. This is equally important where there are changes to existing properties, such as change of use, extensions and garage conversions which may result in additional vehicles at a property.	No change. The issue of rural lanes, on-street parking and highway safety is picked up at paragraph 5.25 (b) which requires a parking stress survey to be provided in cases where unallocated parking is proposed on the public highway to ensure there is adequate capacity. 5.25(b) recognises that "The nature of some roads, for example rural lanes, may mean reliance on on-street parking is inappropriate on highway safety grounds." The SPD will apply to existing properties, extensions, conversions etc where planning permission is required. It cannot be applied for development that can be carried out under permitted development rights.
8	22/02	Whilst we do not have a Neighbourhood Plan, we support the sentiment that due regard should be given where Neighbourhood Plans do exist, and any parking standards set out in a Neighbourhood Plan should not be overridden by this SPD.	Paragraph 2.2 has been clarified in this regard.
9	10 - Hook Parish Council	Hook Parish Council (HPC) accepts the key messages that frame the document (page 3).	Noted.

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	10/01		
10	10/02	Requests that Paragraph 5.25 criterion (a) is expanded to require applicants to specify the dimensions of the car parking spaces proposed, not just the level of parking provision. This will ensure compliance with standards at Paragraph 5.11.	Agree. Amend Paragraph 5.25(a) to read: A plan showing the location and dimensions of all car parking spaces associated with the development, identifying which spaces are allocated, unallocated and disabled.
11	10/03	States that the rationale behind having two standards for 3-bed homes in paragraph 5.4 is unclear.	Insert new paragraph after 5.5: <u>For 3-bedroom homes either car parking standard can be used. It is for the applicant to demonstrate which standard is most appropriate and results in the best design solution.</u>
12	10/04	Requests removal of Figure 3 as the type of cycle parking shown is not a secure standard as stated at para 11.4.2 of LTN 1/20 and it should be removed.	Agree. Delete Figure 3
13	10/05	HPC also wish to comment on the representation made by Carter Jonas (CJ) on behalf of Winchfield Parish Council.	Noted.
14	10/06	HPC supports WPC's request for removal of last sentence of Paragraph 2.2.	See response to WPC comments at 08/02 and the changes to paragraph 2.2.
15	10/07	HPC supports WPC's request for additional sentence to be added to Paragraph 2.6, with minor rewording to read "Due regard should also be had to opportunities to improve cycling and walking infrastructure set out in Neighbourhood Plans".	See response to WPC comments at 08/03 and the change made to accommodate this request.
16	10/08	HPC is unsure why Carter Jonas have suggested the Lambeth Methodology is inserted at Paragraph 5.25 but agree that there is a requirement for an appropriate	See response to WPC comments at 08/05 and the changes made in response to this request.

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		methodology and HDC should specify which will be accepted.	
17	11 - Crookham Village Parish Council 11/01	Paragraph 5.3-Suggests that the wording relating to the flexibility of the car parking standards, undermines the meaningfulness of the standards as a whole.	<p>Disagree that the flexibility built into Paragraph 5.3 undermines the meaningfulness of the standards. Rather, it makes clear that the guidance sets out appropriate levels of parking provision, whilst recognising that sometimes flexibility may be required in order to consider site specific characteristics and context.</p> <p>However, a minor clarification to this paragraph is proposed as shown below:</p> <p>The standards are neither maximum nor minimum, but a guide as to the appropriate quantum of parking to be provided. They should be considered carefully alongside the placemaking quality of a development and the parking strategy for the site, allowing for flexibility in providing alternative parking solutions such as shared mobility, access to alternative modes of transport and opportunities for active travel. Where different standards are used, planning applications must include information to <u>justify a departure from the guidance and demonstrate</u> that the functional parking needs of the development will be accommodated (see Section 7: Documentation to support a planning application).</p>
18	11/02	Suggests that the SPD needs to explicitly define whether new development relates to new builds only or extensions as well.	No change. Paragraph 1.1 states that the guidance applies to “new development that requires planning permission (including development/changes of use of existing buildings)”. In addition, Paragraph 5.6 and Paragraph 5.25,

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			criterion d go on to provide further clarification as to the application of the guidance.
19	11/03	Suggests that a glossary of terms would aid reader understanding.	Agree, provide a glossary in the final version.
20	11/04	Suggests that there needs to be links between standards in the body of the document and tables in the appendices. There should be reference tables in the appendices for all standards defined in the SPD.	Agree. Insert new appendices with the quantitative standards for residential cycle parking and residential car parking. Use links in the final version between text in the main document and the appendices.
21	11/05	Suggests that descriptions of appropriate parking layouts would be improved by the addition of diagrams.	No change. This may be considered for future updates to the guidance.
22	11/06	Requests that when pre-app discussions about parking indicate a deviation from standards in neighbourhood plans, SPD should make it a requirement that Parish Councils are included in pre-app discussions.	Disagree. Procedures for pre-application discussions are a separate matter beyond the scope of this SPD.
23	11/07	Queries what evidence there is to support notion that the district can generate enough electricity from sustainable sources to become carbon neutral by 2040.	No change. This comment relates to the background section and reference to the Council's declaration of a climate emergency.
24	11/08	Queries the plans for recycling increasing volumes of end-of-life electrical waste.	No change. Approaches to waste and recycling in the District is beyond the scope of the SPD.
25	11/09	Suggests that the SPD could be improved by increasing focus on detailed policy instead of aspirational statements.	No change. The background information included in the document is relevant.
26	11/10	Page 3- Suggests that viable cycle options must include secure cycle parking at main destinations, including town centres, as cycles are attractive to thieves.	No change. The SPD sets out standards for secure cycle parking in residential developments and refers to cycle parking standards within LTN/20 for non-residential developments.

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27	11/11	Page 3-The SPD cannot rely on Building Regulations Part S for charging facilities in community car parking areas or roadside places.	No change. The SPD applies to new development which is why it cross-refers to building regulations. Other initiatives are required to deliver charging facilities in places like public car parks and on existing streets.
28	11/12	Page 4-States that the SPD needs to include guidance on how the standards would apply to existing development when changes are proposed e.g. permitted development.	No change. The guidance applies to development that requires planning permission and is not applicable to the rights afforded under permitted development. Paragraph 1.1 is clear on this.
29	11/13	Page 5-Queries the justification of conditions at paragraph 2.2 limiting the weight given to neighbourhood plan parking standards when the same external factors also impact HDC standards.	Clarify para 2.2- see response to WPC comments at 08/02.
30	11/14	Page 6-Suggests including healthcare at paragraph 2.3.	Disagree, this is cross-referencing the Vision 2040.
31	11/15	Page 7-States that Hampshire County Council's (HCC's) prioritisation of walking and cycling over car use at para 2.8 is not viable for many residents and fails to consider the role of public transport.	Noted. The car parking standards take the relative lack of public transport into account. The cycle parking standards are part of the approach to try and achieve model shift away from the car, along with the emerging Local Cycling and Walking Infrastructure Plan (LCWIP).
32	11/16	Page 8-Assertion that Hart accepts inadequate car parking provision as part of new developments which are not served by viable public transport.	No change. The guidance is designed to ensure there is adequate parking provision.
33	11/17	Page 9-Statement that "Nothing will prevent illness – but actions might improve health."	Noted.
34	11/18	Page 9-In relation to the 15-minute city/20 minute neighbourhood concept detailed in paragraph 2.18 it is suggested that other factors also influence use of car for	Noted.

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		school run including catchment areas, school place allocations and journey time.	
35	11/19	Page 10- Suggestion that Paragraph 3.2 should reference access to main transport links.	Agree. Amend paragraph 3.2 as follows: Therefore, any standards need to be considered alongside the placemaking quality of a development and the parking strategy for the site, reflecting the accessibility of the site to local services (<u>including main transport links</u>) and facilities.
36	11/20	States that the map on page 10 is not clear enough.	Seek to address this in final version.
37	11/21	Page 11-Suggests changes in car ownership rates at paragraph 3.9 could be due to children living with parents for longer, and queries evidence that young people are less likely to own cars.	No change. [To be completed – refer to i-Transport study.]
38	11/22	Page 13-Suggests changes to end of paragraph 4.4 to state “and secure” on and off site.	Amend 4.4 as follows to gain clarity on this point: For all new residential developments, the Council requires developers to promote sustainable travel choices. The availability of safe and secure cycle parking at home, at the destination or at an interchange point has a significant influence on cycle use. <u>In addition, cycle parking must be pleasant, sufficient and convenient (LTN 1/20 Cycle Infrastructure Design, Dept for Transport, July 2020).</u>
39	11/23	Page 13-Queries why Paragraph 4.5 only requires one convenient cycle space and why standards don't relate to bedroom numbers and that they should apply to multi-occupancy buildings.	Paragraph 4.5, bullet point 6 states that <i>at least</i> one cycle space must be close to the front door of the property. It could be very challenging in design terms to accommodate more than this close to the front door.

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			For the avoidance of doubt the standards apply to all residential properties, including multi occupancy dwellings, and have been based on bedroom numbers. Also see response to comments at 05/04 above.
40	11/24	Page 15-See comment re. Paragraph 4.5 (comment 11/23) above.	Noted. See response to comments at 11/23 above.
41	11/25	Page 15-Queries why para 4.13 requires cycle parking close to a front door. Near a convenient external entrance would be more appropriate.	To be completed.
42	11/26	Page 16- Paragraph 4.14 - a bigger challenge (than getting a cycle out of the garage when a car is parked on the drive) is to get a bicycle in and out of a garage when there is a car inside it.	To be completed.
43	11/27	Page 16-Suggestion that the flexibility referred to in Paragraph 5.3 undermines the requirements set out in Paragraph 4.4 and would weaken the Council's position at appeal.	Disagree that the flexibility built into Paragraph 5.3 undermines the meaningfulness of the standards. Rather, it makes clear that the guidance sets out appropriate levels of parking provision, whilst recognising that sometimes flexibility may be required in order to consider site specific characteristics and context. See response to comments at 11/01.
44	11/28	5.4 Rounding up over a whole development would result in patchy under-provision of convenient parking spaces and on-street parking, especially for trade vehicles and visitors.	No change. It is unclear how this conclusion has been reached or how the issue can be addressed.
45	11/29	Page 17-Comment that Paragraph 5.7, bullet point 1 suggests only 1 car parking space, irrespective of household size.	No change, this section is cross-referring to building regulations.

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46	11/30	Page 17-States that final bullet point of para 5.7 does not say how unallocated spaces are to be distributed around the development.	No change. Paragraph 5.5 states that unallocated car parking "should be located close to where it is likely to be needed". and will be considered by the Council on a site by site basis.
47	11/31	Page 20- the description "parallel car parking spaces" also applies when two parking spaces are alongside each other away from the highway as mentioned in 5.16.	No change. The definitions of parallel and side by side parking in paragraphs 5.15 and 5.16 are clear and distinct.
48	11/32	Page 21-Queries what is meant by "it" in paragraph 5.22.	Re-cast 5.20 and 5.22 as bullets beneath para 5.19, since they both describe the size of the disabled space. This should improve clarity.
49	11/33	Page 21-In relation to paragraph 5.24, do Building Regulations Part S apply deal with the peak power capacity required?	No change. This is beyond the scope of the SPD.
50	11/34	Pages 21 & 22- Queries whether Building Regulations, Part S apply when accommodation is expanded.	Amend 2.5 as follows: EV charging points must be provided in accordance with Building Regulations Part S which came into effect on 15 June 2022. The location of electric charging points should be considered at the design stage to optimise convenience for users of electric cars. <u>Part S currently applies to:</u> <ul style="list-style-type: none"> • <u>new residential and non-residential buildings;</u> • <u>buildings undergoing a material change of use to dwellings, such as converting a barn into a home;</u> • <u>residential and non-residential buildings undergoing a major renovation where 10 or more dwelling are being created; and</u>

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			<ul style="list-style-type: none"> <u>mixed-use buildings that are either new or undergoing a major renovation.</u>
51	11/35	Page 22 - Suggests listing emergency vehicles under Paragraph 5.25 criterion g	<p>Amend 5.25 as follows:</p> <p>Where unallocated parking spaces are distributed throughout a development, an increased carriageway width should be used to allow cars to park on either side of the street, leaving at least an appropriate width carriageway, particularly to allow for access and turning movements of larger vehicles, such as <u>emergency vehicles and refuse vehicles.</u></p>
52	11/36	Page 22, Paragraph 5.25, criterion h -Queries whether design can be used to 'prevent' inappropriate parking on footpaths, and whether 'discourage' is the more appropriate term?	<p>Amend paragraph 5.25 (h) as follows:</p> <p>h) The design of unallocated parking should make it clear where it is appropriate to park and <u>prevent or discourage</u> inappropriate parking (particularly on footways).</p>
53	11/37	Page 22-Query why Paragraph 5.25, criterion k requires direct access from an allocated space to a home's front door, when parking courts are usually located to the rear of the property?	This paragraph has been clarified in response to separate comment.
54	11/38	Page 23-Paragraph 5.26- Need also to remove permitted development rights from garages and car ports in every case if the parking standards are to be effective in the longer term.	To be completed.
55	11/39	Page 23 - 6.2 To remain effective, all preserved elements of the 2008 standard should be restated in this document to increase their credibility at appeal (unless para 5.3 is retained).	This is unnecessary. Whilst the non-residential car parking standards themselves remain valid, much of the text within the 2008 document is out of date. Including the non-residential standards within an SPD should give them more weight than when in the interim guidance note.

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56	11/40	7.1. (1) - Need also to show access routes from spaces to properties for off-plot parking.	To be completed.
57	11/41	Paragraph 7.1 (4), Sightlines and proximity to corners are also key layout factors.	To be completed.
58	11/42	Page 24- 4.1 (4) bullet point 2 Parking standards say nothing about demand, especially when they are specified with an admitted underlying objective of curtailing demand. Isn't there a better metric against which to assess real demand in the location concerned? Or is the whole idea to constrain demand, not satisfy it?	No change. Here the SPD is saying there needs to be an understanding of parking demand generated by the development. This can be consistent with the parking standards (which are not designed to curtail demand), or something different if adequately demonstrated by the applicant.
59	11/43	Page 24 - para 7.1 (4) bullet point 3 Location for a parking assessment needs to be at a site with characteristics similar to that proposed, not just anywhere nearby.	To be completed.
60	11/44	Page 25 - 7.2 Need also to consider long-term availability of convenient public transport. Define 'quality place-making'.	No change. The reference to location of development covers the point about access to public transport, facilities etc. 'Placemaking' to be defined in the proposed glossary.
61	11/45	Page 25 - 7.4 Developers should submit their mitigation proposals, not just 'be responsible for'. Otherwise it will be too late if they don't bother.	To be completed, but suggest that para 7.4 needs clarification. Also amend para 7.6 regarding transport assessments so that it refers to mitigation: 7.6 Transport Assessments (TA) <u>should be commensurate with the scale of the proposed development</u> , detail the estimated impact of developments on the highway network

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			and identify any mitigation required and depending on the scale of development this may not be required although it may be necessary to reflect cumulative impacts....
62	11/46	Page 25 - 7.6 Previous TAs have not covered a wide-enough area to allow adequate assessment of the effect of development on the wider transport network.	No change. The appropriateness or acceptability of Transport Assessments submitted to support planning applications must be assessed on a case-by-case basis and should be commensurate with the scale of the proposed development.
63	11/47	Page 25 - 7.7 Travel plans historically have been toothless and ineffective greenwashing proclamations with no downstream remedy of inadequacies.	Noted.
64	11/48	Pages 31-35-Proposes redefining geographical areas in which non-residential car parking standards apply so that they are based on streets and natural boundaries, rather than radius from train stations. The SPD would also benefit from further justification for and implications of Zone 1 areas.	No change. This is not considered necessary. The Parking Standards Review 2022 by i-Transport stated "There is no justification at this time to change the standards relating to the quantum of car parking for non-residential uses".
65	19 - Hampshire County Council 19/01	<p>Car ownership levels and future growth</p> <p>Paragraph 3.9 states that car ownership rates in Hart have increased in recent years but future growth is expected to be at a lower rate because there will be less room for growth. The local highway authority would like to see the evidence that has been used to make this assertion.</p> <p>Robust policy measures will be required to constrain growth in private car ownership/use, including the amount of space that is allocated to parking for new development. The standards currently proposed within the draft SPD do not provide the level of constraint required and will encourage a</p>	<p>No change.</p> <p>The commentary in relation to car ownership trends reflects the evidence produced by i-Transport in the Parking Standards Review 2022.</p> <p>The car parking standards set out in the SPD reflect the specific characteristics of the district and take account of high car ownership levels as required by the NPPF.</p> <p>The standards seek to avoid the adverse impacts that have arisen from previous developments with inadequate parking e.g. parking on pavements, verges etc. This serves to harm</p>

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		continuation in the previous trajectory of increasing car ownership.	the street scene and potentially inconvenience pedestrians and cyclists
66	19/02	<p>Car ownership and usage</p> <p>Paragraph 5.1 states that “ownership does not necessarily translate into high usage”. This statement is not supported by the local highway authority as it is contrary to evidence gathered through the National Travel Survey which continues to show that increased car ownership leads to increased use of cars. This trend in the relationship between car ownership and car use has not shown any significant changes since the Covid-19 pandemic, and whilst trip purpose has shown some</p>	No change. The point here is that a household may, for example, need two cars to make different trips at the same time, even if overall that household is reducing its car usage. In Hart, where there is limited public transport and high rates of car ownership, it is sensible to design-in the expected parking required, whilst simultaneously seeking to make walking and cycling more attractive for shorter trips.
67	19/03	<p>Quantum of Car Parking</p> <p>The standards for car parking spaces are far higher than the local highway authority would expect and are likely to result in continued high levels of car ownership, car use and related traffic congestion in Hart. In particular, the provision of 2 parking spaces per 1 bedroom dwelling is considered excessive. Instead, consideration should be given to encouraging lower car parking provision, in favour of provision of car club vehicles, particularly for households where a second or third car is likely to be used only occasionally.</p> <p>It is also noted that the parking standards are to be applied consistently across the district. Instead, the local highway authority would be supportive of an approach where highly accessible locations (e.g. zone 1 as identified for non-</p>	<p>No change.</p> <p>In an area with poor public transport, it is unrealistic to expect people to forego their car when there is no realistic alternative. In Hart this will generally apply whether or not one lives close to a town centre or a public transport facility. This position is supported in The Parking Standards Review 2022 produced by i-Transport which states that due to the rural nature of the district it does not have the range of settlement types with the typical attributes associated with a highly accessible area to justify a zonal approach to car parking standards.</p> <p>Nevertheless, the SPD incorporates flexibility. Paragraph 5.3 states “The standards are neither maximum nor minimum, but a guide as to the appropriate quantum of parking to be provided. They should be considered carefully alongside the</p>

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		<p>residential development) could be considered for low-car or no-car development, supported by provision of car-club vehicles or shared bicycle hire on site.</p> <p>Hampshire County Council requests that the data used to establish the need for such high parking standards is shared, as at present the highway authority cannot support application of standards which will result in outcomes that will be contrary to the objectives of both the emerging Local Transport Plan 4 (LTP4) and NPPF.</p>	<p>placemaking quality of a development and the parking strategy for the site, allowing for flexibility in providing alternative parking solutions such as shared mobility, access to alternative modes of transport and opportunities for active travel. Where different standards are used, planning applications must include information to demonstrate that the functional parking needs of the development will be accommodated...".</p> <p>Para 5.25(c) requires applicants for developments of 50 or more homes to provide evidence that they have explored the feasibility for a car club or similar facility for the site either alone or in combination with other sites.</p> <p>A copy of the i-Transport Parking Standards Review was shared with HCC on 13 July 2023.</p>
68	19/04	<p>Disabled Parking</p> <p>Similar to the provisions suggested for older persons accommodation, it would be expected that sufficient facilities are provided within wheelchair user homes and accessible and adaptable homes for storage and charging of mobility scooters or adapted cycles.</p>	To be completed. Check Building Regulations
69	19/05	<p>Carbon emissions</p> <p>Registers support for Hart's ambitions to reduce carbon emissions, however the proposed car parking standards do not help to achieve this and will instead lead to continued car ownership and usage, resulting in continued high levels of carbon emissions.</p>	<p>No change.</p> <p>See response to comments at 19/01, 19/02 and 19/03.</p> <p>Whilst the Council supports emerging policies DM1 and DM2 in HCC's draft LTP4 in principle, it is not necessary to refer to them in the SPD, especially as they are yet to be adopted.</p>

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		Please refer to Policy DM1 and Policy DM2 of Hampshire County Council's draft Local Transport Plan 4 (LTP4) which discuss the importance of integrating land-use and transport planning to reduce carbon emissions. Particular attention should be paid to the requirement for the assessment of the carbon impact of development. The car parking standards proposed are likely to result in high carbon emissions and therefore higher mitigation costs for developers.	
70	19/06	<p>Electric Vehicle Charging Points</p> <p>The SPD should make reference to opportunities to charge electric vehicles for smaller infill or change of use developments where there isn't sufficient capacity to provide on-plot infrastructure. This could include providing a financial contribution towards electric vehicle charging infrastructure on the highway. The County Council is currently developing an Electric Vehicle strategy to support the local highway authority in advising developers.</p>	No change. Until such time as the County Council has an electric vehicle strategy the matter of electric vehicle charging points is solely covered by Building Regulations Part S which are referred to in the SPD.
71	19/07	Paragraph 4.4 should be strengthened by referring to the emerging Hart LCWIP, noting that development may be required to provide contributions towards delivery of the walking and cycling infrastructure identified in the LCWIP.	Rather than make this point at para 4.4, add the following text to the end of paragraph 4.3 which talks about the LCWIP: <u>Development may be required to provide contributions towards delivery of the walking and cycling infrastructure identified in the LCWIP.</u>
72	19/08	<p>Suitable types of cycle parking</p> <p>It is not clear whether Figures 1 to 5 are intended to be examples of good cycle parking design. If this is the case the County Council would request that Figure 3 is removed as the local highway authority would not support the provision of</p>	<p>Agree.</p> <p>Delete Figure 3</p> <p>Delete Figure 1</p> <p>Refer to cycle hangers?</p>

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	<p>butterfly type cycle stands (as shown in figure 3) as these do not provide a secure facility and cannot be used by all types of cycles. Cycle parking stands should provide the opportunity to lock the frame and wheel(s) of the cycle to an immovable object i.e. the cycle parking stand. Please refer to LTN 1/20 section 11.4 for guidance on suitable cycle parking types (Local Transport Note on cycle infrastructure design, published July 2020).</p> <p>The image in Figure 1 (domestic cycle store) is not considered appropriate for a document that is intended to guide developers on suitable provision for development. It is not expected that developers would provide this type of cycle parking. Instead, it might be more appropriate to include reference to cycle hangers that can be placed on-street (on the carriage, not on the footway) as these would be suitable for use for in-fill / windfall developments or for smaller flatted developments in urban locations where there is not sufficient space to provide secure cycle parking within the curtilage of the development.</p>	
73	<p>19/09</p> <p>Documents to Support a Planning Applications etc. <u>Modes to be considered in assessments:</u></p> <p>The advice given in section 7 of the SPD focuses on car parking. It should be noted that for any application Hampshire County Council would need evidence to demonstrate the transport impact of a development, for all modes, and the possible mitigation available. For example, the Transport Assessment should provide details of all existing transport infrastructure, not just car parking and</p>	<p>The focus for this SPD is on parking standards. To clarify suggest the following change:</p> <p>7.1 <u>With regards to car and cycle parking,</u> as a minimum developers will be expected to submit the following information with a planning application, either within a Design and Access Statement (DAS), or within a Transport Assessment (TA).</p>

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		public transport, as noted in the SPD. There should be explicit mention within the SPD of the need to consider the existing active travel infrastructure in Hart and therefore how the development can support the delivery of the draft Hart LCWIP and Green Grid.	
74	19/15	<p>In paragraph 7.6 contact details are provided for 'Hampshire Highways'. The contact details are correct, but the correct team is called 'Hampshire Development Planning'.</p> <p>Hampshire Development Planning also offer a pre-application service which can be useful for developers to access bespoke advice on their application. Information is available here: https://www.hants.gov.uk/transport/developers/preapplication</p>	<p>Agree. Correct the reference to Hampshire Highways and insert new para to follow 7.6:</p> <p><u>Hampshire's Development Planning Team also offer a pre-application service which can be useful for developers to access bespoke advice on their application. More information is available via the following link:</u> https://www.hants.gov.uk/transport/developers/preapplication</p>
75	19/16	<p>Travel Plans</p> <p>It is good to see reference to Travel Plans in the SPD, however the local highway authority would like to see reference made to the role of travel plans in encouraging use of active and sustainable modes of travel. This section should also refer to how travel plans can be used to demonstrate how the development is reducing its carbon impact.</p>	<p>Amend 7.7 as follows:</p> <p>Travel Plans (TPs) aim to reduce the number of people travelling by car alone and to increase active travel and sustainable travel modes. <u>They can also demonstrate how development can reduce its carbon impact.</u> For further details contact travelplans@hants.gov.uk</p>
76	19/17	<p>Non-residential cycle parking</p> <p>HCC supports the use of LTN 1/20 to guide the design and quantum of cycle parking required for non-residential development. The standards for quantum of cycle parking spaces in LTN 1/20 are a minimum and the SPD should reflect this.</p>	<p>Amend 6.1 as follows:</p> <p>For non-residential cycle parking, applicants should use the <u>minimum</u> standards contained within the LTN1/20 Cycle Infrastructure Design (see section 11.3 Table 11-1)...</p>

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77	19/18	<p>Non-residential car parking</p> <p>It is noted that a benchmarking exercise has been undertaken to review whether the 2008 non-residential parking standards are still relevant. By comparing against other previously published parking standards the approach will bake-in outdated and inappropriate levels of parking.</p> <p>Instead, a better approach would be to consider whether the 2008 standards are still appropriate given Hart and Hampshire County Council's declaration of a climate emergency, recent changes in travel and parking demand, and whether the standards comply with the County Council's transport strategy as set out in the emerging LTP4.</p> <p>In the notes accompanying the table in Appendix 3 it is stated that the standards in category 1 is the 'minimum standard that should be provided'. The local highway authority does not support this approach, particularly in the locations identified as 'zone 1'. It is assumed that these locations are considered to be highly accessible, sustainable locations, with good public transport connectivity. It is not then clear why car use would be encouraged and enabled in these highly accessible locations by requiring the provision of car parking. It is suggested that the approach is taken (as is done elsewhere in the SPD) the number of spaces are a guide and the developer should provide evidence to support a move away from these.</p>	<p>No change. Whilst the main focus of the update on parking standards is concerned with residential standards, the non-residential standards were also sense-checked to ensure they are not out of kilter with standards elsewhere. The i-Transport work concluded that it is unnecessary to review the standards at this time. They have therefore been retained, unchanged in terms of the quantitative standards themselves and whether they are maxima or minima. However, this is something that can be looked at again when the SPD is reviewed.</p>
78	19/19	<p>Appendix 3 of the SPD also provides details for car parking for education establishments. A note should be added to the table to explain that this is not parking for parents / carers,</p>	<p>Add a new note beneath the non-residential parking standards:</p>

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		but rather for school staff. It should be noted that Hampshire County Council will not support on-site car parking provision for parents / carers or the provision of drop-off loops. On-site school parking guidelines (April 2013) are available on-line at https://documents.hants.gov.uk/parking/On-siteSchoolParkingGuidelines.pdf A revised guidance document on school parking is currently being prepared by the County Council.	<u>6. Parking standards for schools apply to school staff, not to parents or carers.</u>
79	19/20	Registers thanks for sharing the evidence base that supports the SPD and recognises that parking policy and standards is a local issue. Having reviewed the rationale and evidence for the parking standards proposed however, does not support the document or the associated evidence, as per the original consultation response.	Noted.
80	09 - Waverley Borough Council 09/01	Waverley Borough Council wish to register that they have declared a climate emergency and support the SPDs aim to encourage a shift to sustainable modes of transport.	Noted.
81	09/02	Welcomes strong guidance on cycle parking and references to LTN 1/20, as well as to the diversity of cycles, especially supporting disabled cycling	Noted.
82	09/03	The SPD makes repeated reference to "Cycle infrastructure design". Queries whether this should be "Cycle Infrastructure Design" (i.e. using capital letters)	Agree. Use capital letters where this is referenced.

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83	09/04	Paragraph 4.5-Requests that references to “bikes” should be changed to “cycles” to ensure the diversity of cycles is reflected.	Agree. Replace “bikes” with “cycles” in Paragraph 4.5, as well as those identified in Paragraphs 3.10, 4.2, 4.6, 4.8, 4.9, 4.14 and 4.15
84	09/05	Figure 3- States that Figure 3 shows a butterfly cycle stand which is not a secure type of cycle parking. Secure cycle parking should provide a locking point for the frame.	Agree. Delete Figure 3
85	05 - Hampshire and Isle of Wight Constabulary 05/01	Section 4: Residential Cycle Parking: Hampshire suffers high levels of pedal cycle theft. It is against this background that these comments are made.	Noted.
86	05/02	Section 4- It is important that a range of safe connectivity is provided throughout new development. Isolated pedestrian and cycle routes are less safe than those running adjacent to the public highway, especially after dark. Safe routes should have good natural surveillance from overlooking dwellings and the public realm, be straight, be wide at least 3m metalled surface, planting should not obscure natural surveillance and lit to British Standard (BS) 5489-1:2020. I would draw your attention to Local Transport Note (LTN) 1/20, paragraph 4.2.12.	Agree with the point made but wish for this section to retain an emphasis on parking. Add reference to further guidance. Amend paragraph 4.3 as follows: As part of the wider picture the Council has a vision for a ' Green Grid ' of routes between settlements and green spaces to encourage walking, cycling and other forms of sustainable healthy transport. Guidance on the design of pedestrian and cycle routes is set out in Local Transport Note (LTN) 1/20 .
87	05/03	Section 4- states that the words “secure cycle parking” or similar are used in several places within section 4, however, nowhere within this section are the attributes of secure cycle	To be completed.

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	<p>parking defined. Some reference to the attributes of secure cycle parking should be included within the SPD as follows:</p> <p>Residential or Staff Parking:</p> <ul style="list-style-type: none"> • Within a secure structure, building or shed • With good natural surveillance • 4The door should be fitted with a lock that provides for a5authorised access only • Within the cycle store there should be a cycle anchor point for each cycle to be stored within the store • Lighting (not for stores within a dwelling's rear garden) <p>Within the public realm, a high street, or other facility:</p> <ul style="list-style-type: none"> • Sighted with good visibility from the public realm and any overlooking dwellings, close to the area is serves / building, not on the distant edge of a car park • Covered to provide protection from the elements • Fitted with cycle anchor points • Lighting to provide for the safety of the cyclist and to allow them to operate the cycle lock after dark. • Fall within the coverage of Closed Circuit Television (CCTV) cameras, if fitted. 	

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88	05/04	Paragraph 4.5, bullet point 6-Requests that the SPD is clarified in relation to appropriate design and location of cycle parking close to the public realm which are very vulnerable to crime.	To be completed.
89	05/05	Paragraph 4.6- Within a residential setting secure cycle parking is generally provided with a secure rear garden. If the secure cycle storage is not convenient to access that is generally because of poor design, which should be corrected at the design stage of development.	To be completed.
90	05/06	Figure 3 - States that cycle parking stand shown in Figure 3, which only attaches to front or rear wheel is not secure. The anchor point should allow the frame to be secured. The Sheffield stand provides the minimum level of security but better options such as "streetpod" are better.	Agree. Delete Figure 3.
91	05/07	Suggests that cars parked in the public realm are more likely to be the subject of an incident. Therefore, residential car parking spaces should be in locations that provide good surveillance from the owner's home.	No change. This point is already addressed at paragraph 5.25 j and k.
92	05/08	Paragraph 5.25, criterion d, bullet point 3 Proposes rewording the following text: "Where the proposal is for the conversion of a dwelling into an HMO (House of Multiple Occupation) one space per bedroom will be required." so that the word "dwelling" is replaced with "premises" or "building".	Agree. Amend 5.25 as follows: Where the proposal is for the conversion of a dwelling <u>or other uses</u> into an HMO (House of Multiple Occupation) one space per bedroom will be required.

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93	05/09	Paragraph 5.25, criterion k-Suggests amending the wording from: "Where a parking court is considered, it must:" to: "where parking is to be within the public realm or a parking court it must"	Agree. Amend paragraph 5.25 (k) as follows: Where a parking <u>is to be within the public realm or a parking court is considered</u> it must:...
94	05/10	Paragraph 5.25, criterion j-Suggests that references to "well lit" should be replaced with the British Standards reference "British Standard (BS) 5489-1:2020"	Agree. Amend 5.25 (j) as follows: Wherever parking is provided it needs to be more attractive than inappropriate parking opportunities. It should be accessible, <u>well lit to British Standard (BS) 5489-1:2020</u> , overlooked, and attractive.
95	05/11	Paragraph 5.25, criterion k-Suggests amendments to the text to make it clear that parking courts should be secure by having robust boundary treatments and a single point of access.	Agree that parking courts should be secure. However, a single access/egress point and robust boundary treatments may not be suitable in all instances and should be assessed on a "site by site" basis. E.g. where parking courts are to the front of properties, robust boundary treatments could have a negative impact in terms of character and appearance and there may not be sufficient circulation space to have a single access/egress point. Paragraph. 5.25, criterion k will be amended to add an additional bullet point as follows: Where a parking court is considered it must: <ul style="list-style-type: none"> • <u>be secure</u>
96	05/12	Paragraph 5.25, criterion k, bullet point 4- Suggests that the words "be lit at night" should be replaced with the British Standards reference "British Standard (BS) 5489-1:2020"	Amend 5.25 (k) bullet point 4 as follows: <ul style="list-style-type: none"> • lit at night <u>to British Standard (BS) 5489-1:2020;</u>

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97	05/13	Paragraph 5.25, criterion k, bullet point 5- Suggests that the words "be well lit" should be replaced with the British Standards reference "British Standard (BS) 5489-1:2020"	Amend 5.25(k) bullet point 5 as follows: ...Where pedestrian footpaths are provided that connect courtyard parking spaces with the front door of people's homes these must be afforded good, clear sightlines and be well lit to British Standard (BS) 5489-1:2020;...
98	05/14	Paragraph 5.25, criterion k, bullet point 6 –Suggests that the text in paragraph 5.25 criterion k, bullet point 6 gives the impression that access from public realm is directly via external door into property, which would increase vulnerability to crime.	Amend 5.25(k) as follows: Have convenient pedestrian connections to the properties being served. Residents must be able to gain direct access from their allocated parking spaces <u>get</u> to the front door of their home <u>safely and conveniently from their allocated parking space</u> . Where pedestrian footpaths are provided that connect courtyard parking spaces with the front door of people's homes these must be afforded good, clear sightlines and be well lit;
99	05/15	Suggests that the Council seeks advice from the Fire Authority as to any requirements to provide for the safety of the public in relation to electric vehicles due their ability to spontaneously combust.	No change. This falls outside the scope of planning guidance.
100	12 - National Highways 12/01	We note that the draft cycle and car parking guidance is for 'new development that requires planning permission (including development/changes of use of existing buildings)' (1.1, p4). We support Hart District Council's commitment to ' <i>reduced car use, promote sustainable transport and active travel</i> ' (second bullet, p3) by having ' <i>[n]ew development ... provide the appropriate amount of cycle and car parking and ... designed to encourage a shift away from car use towards</i>	Noted. No change.

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		<p>walking, cycling and other sustainable modes of transport' (third bullet, p3). Both the Local Road Network (LRN) and the SRN should benefit from reduced car use if the guidance is supported by the delivery of sustainable transport measures (an objective of the Hart Local Plan (Strategy & Sites) 2032) and Travel Plans (raised in the draft guidance). We welcome Travel Plans for all new developments, including residential developments.</p>	
101	12/02	<p>We note that the residential car parking standards are <i>'neither maximum nor minimum, but a guide as to the appropriate quantum of parking to be provided'</i> and <i>'should be considered carefully alongside the placemaking quality of a development and the parking strategy for the site, allowing for flexibility in providing alternative parking solutions such as shared mobility, access to alternative modes of transport and opportunities for active travel.'</i> (5.3, pp16&17). However, we welcome the fact that the car parking standards for six of the seven non-residential land use categories are maximum rather than minimum standards (Appendix 3, pp28-30 & note 5, p30). Commercial Development alone has minimum standards but with higher minimum provision for Office (B1(a)), Research and Development or Light Industry (B1(b) or (B1(c)) and General Industry (B2) within 400m of Blackwater Station and within 800m of Fleet and Hook Stations and we welcome this.</p>	Noted. No change.
102	13 - Blackwater Valley	<p>Suggests that the impact of LTN 1/20 has not been maximised. A full cross-check between the two documents should be completed.</p>	No change. The SPD is consistent with the guidance and recommended minimum standards in relation to cycle

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	Friends of the Earth 13/01		parking set out in LTN 1/20-Cycle Infrastructure Design in regard to both residential and non-residential uses.
103	13/02	Suggests that the SPD should cover all age ranges and bike types.	No change. Paragraph 4.5 of the SPD requires applicants to consider a range of cycle types early in the planning and design process, including, but not limited to, cargo bikes and adapted cycles which would cater to a range of ages.
104	13/03	Suggests that covered and secure cycle storage must be provided for residential uses, including for visitors.	No change. Paragraph 4.5, bullet point 3 of the SPD requires consideration of secure cycle parking storage that is both covered / lockable for residential uses which applies to allocated spaces for residents and unallocated spaces that would be used by visitors.
105	13/04	Suggests that there should be greater links to existing cycle networks.	No change. The matter of links to existing cycle networks is beyond the scope of this SPD. However, the Council is currently preparing a draft LCWIP which is referred to in Paragraph 2.6.
106	13/05	Suggests that proposals for car parking in new developments should match the current and projected provision offered by the existing use.	No change. This suggestion does not accord with national policy nor reflect the parking requirements of the proposed development.
107	13/06	The SPD needs to be clearer on requirement for electric vehicle parking spaces in older persons accommodation.	No change. At paragraph 2.4 the SPD already cross refers to Building Regulations Part S which set out the requirements for electric vehicle charging points.
108	18 - Historic England 18/01	Supports work done on the SPD to reduce emissions and support shift toward sustainable modes of travel.	Noted.

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		Reductions in car use can have positive impact on historic environments through reduced noise and air pollution, traffic, parking and congestion.	
109	18/02	Suggests that cycle interventions should be designed to protect and enhance historic environment. Historic England guidance on good practice can be found in Streets for All .	Noted.
110	18/03	Paragraph 4.5-Advises adding a bullet point to Paragraph 4.5 stating the following: "The character of the local area, informed by its environmental assets and enabling an appropriate response to its features of significance"	To be completed.
111	18/04	Paragraph 5.24-Advises amending the paragraph to state the following: "EV charging points must be provided in accordance with Building Regulations Part S which came into effect on 15 June 2022. The location of electric charging points should be considered at the design stage to optimise convenience for users of electric cars, while avoiding or mitigating harm to the local historic environment"	<p>The point here is that charging points are conveniently located so that petrol/diesel cars are not easier to use. However, suggest the following change:</p> <p>5.24 EV charging points must be provided in accordance with Building Regulations Part S which came into effect on 15 June 2022. The location of electric charging points should be considered at the design stage to optimise convenience for users of electric cars (<u>there could be other factors that influence the location of charging points such as the need to avoid or mitigate harm to heritage assets</u>).</p>
112	18/05	Paragraph 5.25-Advises adding an additional criterion to Paragraph 5.25, after "i" to state the following: "Proposals must take account of the local historic environment and demonstrate how local context has informed the scheme design".	No change. This is a requirement in any event.

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113	01 - Transport for London	Do not wish to comment.	
114	04 - The Coal Authority	Do not wish to comment.	
115	14 - Natural England	Do not wish to comment.	
116	15 - Rushmoor Borough Council	Do not wish to comment.	
117	07 - Councillor, Crookham East Ward 07/01	States that whilst promoting the use of cycles is important, consideration must also be given to the high levels of car ownership in Hart. Existing developments such as Edenbrook and Elvetham Heath have insufficient parking provision which leads to disputes between neighbours over spaces and creates an unattractive street scene. The car parking standards should be more generous so that these problems are avoided.	No change. The intention of the new guidance is to avoid issues of parking under-provision experienced in some past developments.
118	16 - Member of Parliament for North East Hampshire 16/01	On behalf of my constituents, I have set out in this email their various concerns and considerations on this planning document. HDC should alter its fundamental message. From the outset of this document, it is clear to see that you want to massively reduce the use of private vehicles. My	No change. The SPD recognises there are high levels of car ownership in Hart and aims to ensure there is sufficient parking provided with new development to avoid problems of under-provision. The SPD aim to help achieve modal shift away from cars towards walking, cycling and public transport in accordance with national planning policy and Council objectives.

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		<p>constituents and I do not want to see this being a threat on future developments, as private vehicles are still by far the primary method of travel, in what is a somewhat rural area. HDC must instead allow for greater personal freedom and accommodate for the need for cars. Simply selling properties with fewer parking spaces does not decrease the traffic load, but instead makes life more difficult for local people, with increased on street parking, more neighbour disputes, etc.</p> <p>Instead, initiatives such as requiring EV chargers should be the priority of HDC to meet carbon neutral targets, alongside creating greater garage space for house users. This would allow for bicycle and other vehicle parking within, so that additional facilities do not have to be built. These proposals are detailed in my proposed alterations to the document, on behalf of constituents, below. Any changes I have made are either stated or in bold.</p>	<p>EV charging is required through building regulations, referred to in the SPD.</p> <p>Greater garage space for storing vehicles and cycles is an option for developers but it would be overly prescriptive to insist on that as the only means for storing cycles, and of course not all properties will have a garage.</p>
119	16/03	<p>Key messages, bullet point 2</p> <p>Planning policy should not aim to 'reduce car use' and so should be removed from this sentence.</p>	<p>No change. Planning policy does aim to reduce car use.</p>
120	16/04	<p>Key messages, bullet point 3</p> <p>'designed to encourage a shift away from car use towards walking, cycling and other sustainable modes of transport' should be removed. HDC should make sure that developments provide the quantity of car parking that people want today.</p>	<p>No change. It is an objective that design should encourage a shift away from car use. Nevertheless, the approach in the SPD does recognise car ownership levels in Hart.</p>
121	16/05	<p>Key messages, bullet point 5: 'Electric car charging provision must be provided in line with Building Regulations. These</p>	<p>Noted.</p>

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		<p>must be designed into schemes to optimize convenience for electric car users.'</p> <p>This is excellent - this should be the central to HDC's efforts.</p>	
122	16/06	<p>Key messages, bullet point 6</p> <p>'provide convenient and secure storage space' should be changed to 'provide a garage'. HDC should push for garage spaces with homes to store both bicycles and motor vehicles.</p>	<p>No change.</p> <p>Greater garage space for storing vehicles and cycles is an option for developers but it would be overly prescriptive to insist on that as the only means for storing cycles, and of course not all properties will have a garage.</p>
123	16/07	<p>Paragraph 1.2 states 'this will avoid the various problems created by over-and-under provision of parking'. This point needs clarification and rethinking, as I believe there is no such situation as an over provision.</p>	<p>No change. Over-provision of parking is an inefficient use of land and amounts to poor design.</p>
124	16/08	<p>Paragraph 2.8, bullet point four states that an aim of HCC's LTP4 is to 'prioritise walking and cycling over private car use'. Regardless of the County Council's policy, I ask that this is removed, as I do not believe that local people should be pushed out of private car ownership.</p>	<p>No change. It is appropriate to refer to HCC's LTP4 in an SPD on parking. The SPD is not aiming to push people out of car ownership.</p>
125	16/09	<p>Paragraph 2.18 - I have reservations over the idea and terminology of '15- minute cities/20-minute neighbourhoods'. This idea needs to be better practically set out to residents. Also, 'providing highly visible, convenient, and secure bicycle storage' should be simply changed to 'garage facility'. Both bicycles and cars should and can be stored in a garage facility.</p>	<p>No change, the SPD merely refers to the 15/20 minute neighbourhood concept as background.</p> <p>Greater garage space for storing vehicles and cycles is an option for developers but it would be overly prescriptive to insist on that as the only means for storing cycles, and of course not all properties will have a garage.</p>
126	16/10	<p>Paragraph 3.9 states that 'future growth is predicted to be at a lower rate, reflecting the already high car ownership rates'.</p>	<p>No change. The Parking Standards Review 2022 by i-Transport, which informs the content of the SPD, identifies</p>

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		It is impossible to predict the future; I would like to see concrete evidence for this point. Counter predictions feature in the HDC Parking Provision Interim Guidance, August 2008, where paragraph 4.2 states 'Assuming the same rate of increase on the Hart 2001 car ownership level of 1.65 cars per household then the figure for Hart in 2036 could be of the order of 2.14 cars per household'.	that there are currently high levels of car ownership in the district, and that combined with shifting attitudes towards vehicle ownership this would indicate that there is less room for growth in future.
127	16/11	Paragraph 3.10, bullet point two, follows a similar line, stating that 'fewer young people choosing to own a car'. Again, what evidence is this statement based on? Cars are more likely to be leased than ever before, increasing new car availability.	No change. [To be completed – refer to i-Transport report.]
128	16/12	Paragraph 3.10, bullet point three, I ask for clarification if whether 'shared rides' and 'apps' means that HDC is to approve 'Uber' licenses? Also, it states that HDC policy is to 'break dependency on private car ownership'. I would like to see this removed, as local people should be free to choose what they own and use.	No change. Uber licenses are out of scope of the SPD. Breaking dependency on private car ownership does not mean stopping people from choosing to own a car, it means a situation in which people can choose not to own a private car yet still use a car when they need to. Studies on the use of Car Clubs have concluded that car clubs can have a number of benefits for local communities including reducing dependency on private vehicle ownership, a reduction in emissions (as car club cars tend to use newer more environmentally friendly fuel such as hydrogen or electricity), less congestion on roads, improved air quality and increasing participation in sustainable and active travel. As they provide access to a vehicle on a pay-as-you-go

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			basis they are appealing for those who use a car infrequently, due to the significantly lower costs involved.
129	16/13	Paragraph 4.5 – I commend the use of the word 'garage' and this should be implemented on other points I have made. However, the language of 'shed space' should be removed, as a garage should store bicycles and other private vehicles.	It would be overly restrictive to insist cycles are stored in garages. Equally shed space is not the only alternative solution. Suggest the following change to 4.5 bullet 6: <ul style="list-style-type: none"> To encourage residents to ride their cycle instead of using their car, cycle storage must be conveniently located and readily accessible. At least one secure cycle space must be close to the front door of the property. Others could be included within a suitable garage or shed/<u>storage</u> space.
130	16/14	Paragraph 4.11 – I recommend that HDC does not use this level of prescription (referring to the quantitative cycle parking standards) and instead puts its efforts into ensuring that garages are long enough to store bicycles within them. This section should, therefore, be removed and replaced with greater emphasis on garage storage. Paragraph 4.13 - For the reasoning above in respect of para 4.11, I recommend this paragraph is removed (paragraph 4.13 requires at least one cycle space be provided close to the front door) Paragraph 4.14 – the line 'developers are encouraged to consider integrating secure external bike stores to the front of properties' should be removed for the same reasons.	No change. It is overly prescriptive to refer to garages as the sole means providing cycle storage. It fails to acknowledge the size and variety of homes. Applicants need to know how many cycle spaces are required and have options open as to how best that should be designed in.
131	16/15	Paragraph 5.4	No change. No evidence has been submitted to justify these standards. Whilst the Council does wish to avoid problems of under-provision of car parking, equally it does not wish to

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		<p>Car parking standards should be altered to allow people to adequately park their vehicles and my recommendations (that should be read alongside my amendments to 5.12 and 5.13) are:</p> <p>1 bed home – 2 allocated, 0.5 unallocated 2 bed home – 3 allocated, 0.5 unallocated 3 bed home – 4 allocated, 0.5 unallocated 4 bed home – 5 allocated, 0.5 unallocated 5 bed home – 5 allocated, 1 unallocated; or 6 allocated, 0 unallocated.</p>	see over-provision of parking which is an inefficient use of land.
132	16/16	<p>Paragraph 5.4 - Amend the following wording as follows: “An under-provision of allocated spaces needs to be made up with unallocated spaces, <u>and vice versa</u>”.</p>	To be completed.
133	16/17	<p>Paragraph 5.4 - Amend the following wording as follows: ‘A minimum of 5% of unallocated spaces should be designed for use <u>to be useable</u> by disabled people’.</p> <p>This change in language from ‘for use by disabled people’ to ‘to be useable by disabled people’ makes sure that spaces can be used by disabled residents, and can be moved in a development to best help them, but not solely designated for them, as they may otherwise go unused.</p> <p>This change can also be made to paragraph 5.7, bullet point three which states:</p>	To be completed.

Consultee and rep no.		Issue raised	HDC's draft response
		<ul style="list-style-type: none"> In addition, a minimum of 5% of unallocated car parking spaces should be designed for use by disabled people. 	
134	16/18	<p>Paragraph 5.11 - Recommends increasing size of parking spaces as follows:</p> <p>standard parking space: from (2.5m x 5.0m) to (2.7m x 5.5m)</p> <p>parallel parking space: from (2.0m x 6.0m) to (2.7m x 6.5m)</p> <p>tandem (2 cars): from (2.5m x 11m) to (3.25m x 14m, or longer to allow for cycle parking inside)</p> <p>double garage (internal dimension): from (6.0m x 7.0m) to (6.5m x 7.0m, or longer to allow for cycle parking inside).</p> <ul style="list-style-type: none"> <i>Where a driveway is to be used for parking in front of a garage, the overall length of the space will need to be a minimum of 6.0m 6.5m to allow access to the garage.</i> 	No change. No evidence has been submitted to justify these dimensions. The car parking space dimensions set out in the SPD have been informed by evidence set out in i-Transport's Parking Standards Review 2022.
135	16/19	<p>Paragraph 5.12 - Recommends the following change:</p> <p>5.12 Single garages are not counted as a parking space <u>so long that they have a clear internal dimension of 3.25m x 7.0m</u>. This is because they are typically used for storage. Garages do, however, provide useful space for the ever-changing variety of other transport options including larger vehicles such as mobility scooters, powered two wheelers, tricycles etc.</p>	No change. No evidence has been submitted to justify these dimensions. [refer to relevant section of i-Transport report]
136	16/20	<p>Paragraph 5.13 - Recommends the following change:</p> <p>5.13 Double garages count as one <u>two</u> parking spaces if they have a clear internal dimension of 6.0m <u>6.5m</u> x 7.0m.</p>	No change. No evidence has been submitted to justify these dimensions. [refer to relevant section of i-Transport report]

Consultee and rep no.		Issue raised	HDC's draft response
		Access to the garage should be wide and convenient for easy use with modern cars.	
137	16/21	<p>Paragraph 5.14 – ‘the minimum dimensions set out above’ would now be 3.25m x 7m. due to my recommendations.</p> <p>For reference para 5.14 states:</p> <p>5.14 Car ports are counted as a parking space if the parking space meets the minimum dimensions set out above, and if it is demonstrated that the items that residents typically store in garages are provided in another location, for example, garden maintenance equipment, bicycles, dry recycling.</p>	To be completed, but it may be necessary to clarify which ‘minimum dimensions’ are being referred to, the minimum for a standard parking space, or the minimum for a single garage. The respondent reads this as minimum standards for a single garage.
138	16/22	Paragraph 5.15 should be removed.	No change. This paragraph clarifies what is meant by a parallel parking space and why it can be narrower than a standard space.
139	16/23	Paragraph 5.24 is excellent and creating more EV charging points should be a priority for HDC.	Noted.
140	16/24	<p>Paragraph 5.25 (a)</p> <p>Remove the word disabled, as surely it is impossible to know for certain who is disabled prior to a development being built and occupied; it is really important that spaces are in the right places for the people who need them.</p>	No change. When submitting a planning application the developer cannot be expected to know who will buy the property(ies) before they are built and design a scheme and its parking provision around them. In any event homes tend to have subsequent occupants.
141	16/25	<p>Paragraph 5.25 (b) – should be amended as follows:</p> <p>b) Where unallocated parking is <u>not</u> to be accommodated on the public highway <u>unless the highway is particularly wide, enabling two opposing vehicles to pass a parked car simultaneously</u>. this should be accompanied by an</p>	No change. This suggestion does not actually make sense as drafted. Presumably the intended message is that on-street parking should not be relied upon unless the highway is particularly wide, enabling two opposing vehicles to pass a parked car simultaneously’. [To be completed]

Consultee and rep no.		Issue raised	HDC's draft response
		assessment of the parking stress in the area and the capacity for on-street parking. The nature of some roads, for example rural lanes, may mean reliance on on-street parking is inappropriate on highway safety grounds.	
142	16/26	<p>Paragraph 5.25, criterion c - Recommends criterion c is deleted.</p> <p>For reference, 5.25 c) states:</p> <p>c) For developments of 50 or more homes, evidence of exploring the feasibility for a car club or similar facility for the site either alone or in combination with other sites.</p>	<p>No change.</p> <p>Encouraging developers to explore the feasibility of implementing car clubs for larger developments is consistent with national policy and would be in the interests of sustainability. Studies on the use of Car Clubs have concluded that car clubs can have a number of benefits for local communities including reducing dependency on private vehicle ownership, a reduction in emissions (as car club cars tend to use newer more environmentally friendly fuel such as hydrogen or electricity), less congestion on roads, improved air quality and increasing participation in sustainable and active travel. As they provide access to a vehicle on a pay-as-you-go basis they are appealing for those who use a car infrequently, due to the significantly lower costs involved.</p>
143	16/27	<p>Paragraph 5.25 e) This should not affect private driveways, which should be entirely privately owned and the responsibility of the householder, so this should be made clearer.</p> <p>For reference e) states:</p> <p>e) where there is allocated and non-allocated parking provision which is not adopted by the Highway Authority the developer will have to provide the appropriate arrangements for their future management and maintenance.</p>	<p>Clarify 5.25(e) as follows:</p> <p>e) where there is 'off-plot' allocated and non-allocated parking provision which is not adopted by the Highway Authority the developer will have to provide the appropriate arrangements for their future management and maintenance.</p>

Consultee and rep no.		Issue raised	HDC's draft response
		Paragraph 7.1 –On point four, Bullet five should be removed. Point five should also be removed.	
144	16/28	Paragraph 7.1 (1) - the word 'disabled' should be removed from point one, so that disabled spaces can be accurately provided where they are needed, in response to who actually moves into the development at any moment in time.	No change. It is important when assessing a planning application to see which spaces are the disabled spaces. It is unclear how the respondent envisages this being changed over time should different needs arise. The spaces need to be suitably located with the life of the development in mind.
145	16/29	Paragraph 7.1 (4) - bullet point three, this assessment should take place within school term time.	Agree. Amend 7.1(4) bullet 3 to refer to school term time.
146	16/30	Paragraph 7.1 (4), bullet point 5 – should be removed. For reference, bullet point 5 seeks information relating to the proximity of public transport as part of the assessment of parking stress.	No change. A site's proximity to public transport forms part of the understanding needed when assessing parking stress (even if the importance attached to it may vary depending on circumstances).
147	16/31	Paragraph 7.1 (5) - Seeks deletion of point (5) which for developments of 50 or more homes requires applicants to provide evidence of correspondence with a car club operator regarding the feasibility of a car club for the site.	No change. Encouraging developers to explore the feasibility of implementing car clubs for larger developments is consistent with national policy and would be in the interests of sustainability. Studies on the use of Car Clubs have concluded that car clubs can have a number of benefits for local communities including reducing dependency on private vehicle ownership, a reduction in emissions (as car club cars tend to use newer more environmentally friendly fuel such as hydrogen or electricity), less congestion on roads, improved air quality and increasing participation in sustainable and active travel. As they provide access to a vehicle on a pay-as-you-go basis they are appealing for those who use a car infrequently, due to the significantly lower costs involved.

Consultee and rep no.		Issue raised	HDC's draft response
148	16/32	<p>Paragraph 7.3 – I recommend the 'Travel Plans' (TP) should be removed as they try to prevent private ownership of vehicles, of which my constituents are against.</p> <p>Paragraph 7.7 – This Travel Plan point should be removed for the same reasons.</p>	No change. Travel Plans are required for certain developments.
149	16/33	<p>On Appendix 3 'Non-residential car parking standards' I propose in bold my alterations.</p> <ul style="list-style-type: none"> • In column three, under '16+ Colleges and Further Education' I would amend both in 'Zone 1' and 'elsewhere', the standard to '+ 1 space per 5 students' • In column five, under 'Day centres for older people, adults with learning disabilities' I would amend both in 'Zone 1' and 'elsewhere', the standard 'staff: 1 space per 1 FTE' • In column five, under 'Homes for Children' I would amend both in 'Zone 1' and 'elsewhere', 'Non-residential staff: 1 space 1 FTE'; 'Visitors: 1 space per 3 clients' • In column five, under 'Family Centres' I would amend both in 'Zone 1' and 'elsewhere', 'Staff: 1 space per 1 FTE' • In column five, 'Residential units for adults with learning or physical disabilities' I would amend both in 'Zone 1' and 'elsewhere', 'Non-residential staff: 1 space per 1 FTE'; 'Visitors: 1 space per 3 clients' 	<p>No change.</p> <p>No rationale has been provided for these proposed changes. Whilst the main focus of the update on parking standards is concerned with residential parking standards, the non-residential car parking standards were also sense-checked to ensure they are not out of kilter with standards elsewhere. The i-Transport work concluded that it is unnecessary to review the standards at this time. They have therefore been retained, unchanged. However, this is something that can be looked at again when the SPD is reviewed.</p>

Consultee and rep no.		Issue raised	HDC's draft response
150	16/34	<p>Appendix 3 Non-residential parking standards</p> <p>Note 3 is contrary to my understanding of actual usage in HDC, where there is an oversupply of disabled spaces and an undersupply of enlarged parking spaces (e.g. mother and child). HDC may want to rethink this ratio accordingly, to provide more for families.</p> <p>For reference note 3 states:</p> <p>“Parking for disabled people should be additional to the maximum parking standards. Development proposals should provide adequate parking for disabled motorists, in terms of numbers and design. The British Standards Institution recommends that commercial premises should have one space for every employee who is a disabled motorist plus 5% of the total capacity for visitor parking should be designated as disabled parking, with a further 4% of the total visitors parking consisting of enlarged standard spaces.”</p>	<p>In the absence of stronger evidence, it would be inappropriate to deviate from the British Standards Institution.</p>
151	02 – Individual respondent 02/01	<p>States that they cannot find information in the document that specifies the quantity and locations for cycle storage in public areas and that the Hart District cycle and car parking plan should therefore make specific commitments to what will be made available by location and when. These facilities are particularly important in the following locations: retail centres, e.g. Fleet town centre and recreational centres, e.g., Hart leisure centre, Harlington Centre, Fleet pond.</p>	<p>No change. The SPD provides guidance for new development. However, suitable locations for new cycle parking facilities have been identified in Hart's draft Local Cycling and Walking Infrastructure Plan (LCWIP) which is scheduled for adoption December 2023.</p>
152	02/02	<p>States that cycle theft is a material issue in the district and that investment into cycle facilities, such as new routes, will be wasted due to insecurity of parking locations.</p>	<p>No change. The SPD states that cycle parking must be secure.</p>

Consultee and rep no.		Issue raised	HDC's draft response
153	02/03	Suggests that new public cycle parking facilities could be funded by increasing car parking charges in car parks and proceeds from vehicle tax could be used to fund cycle storage	No change. The SPD is concerned with new development and the provision of cycle parking therein, funded by the developer.
154	03 – Individual respondent 03/01	States that the SPD places too much emphasis on cycleways and not enough on increasing the quantity and size of car parking spaces.	No change. The SPD does cover the quantity and size of car parking spaces.
155	03/02	States that transport infrastructure is virtually non-existent and with an ageing population it is particularly difficult for older residents to access amenities.	No change. The standards take into account the relative lack of public transport provision in Hart.
156	03/03	States that under the current NPPF Hart has a shortfall of 230 houses to 2032. To accommodate a growing population and the requirement to provide for more workers in essential services more credence should be given to the Shapley Heath development and would pre-empt any increase in the NPPF requirement. Also, more should be made of the under-utilised Winchfield Station, which could be used to provide a range of local infrastructure e.g. doctors surgeries and community services.	No change. This statement is incorrect regarding housing delivery, and is in any event irrelevant to the SPD.
157	06 – Individual respondent 06/01	States that the measures in the SPD will not increase the number of people choosing to cycle without safe cycle paths.	No change. The Council is producing an LCWIP with the aim of improving routes for cyclists. Paragraph 4.3 of the SPD acknowledges that roads, paths and layouts that encourage walking and cycling are needed.

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158	06/02	States that extra cycle and car parking storage will necessitate lower density housebuilding.	No change. Even if this transpires to be the case (and by no means it this certain), it is part of good place-making to design-in the appropriate amount of car and cycle parking.
159	06/03	States that The SPD should recognise the increasing need and unmet demand for larger family homes and special consideration of flexible and adaptable homes and layouts that cater for children cycling safely.	No change. The SPD does provide standards for family homes and at para 4.3 refers to guidance on the design of cycle routes refers to guidance in Local Transport Note (LTN) 1/20 .
160	06/04	States that neverending extensions demonstrate demand for larger family homes that has not been satisfied. Parking and cycle parking should be a significant, objective feature of decision making.	No change. Agree car and cycle parking are important issues.
161	17 – Individual respondent 17/01	<p>I do support the requirement that new homes have space for cycle parking.</p> <p>However, cars are much larger than cycles so requiring car parking is a much more disruptive and expensive requirement and I do not think it is consistent with Hart's 2040 vision theme 2: "Improving affordability of homes"</p> <p>One of the ways that living in Hart is expensive is that in practice residents need to pay for a car. In addition they are forced to pay for the space to keep multiple cars.</p> <p>I accept that at present it is very hard to move around Hart without a car, but I would hope that Hart and Hampshire have plans to remedy this.</p> <p>Once it is possible to live in Hart without a car, requiring a high amount of car parking per home just increases the cost of the home. This will also encourage car use, as residents are more likely to own a car if they are forced to</p>	<p>No change.</p> <p>Paragraph 5.3 of the SPD provides some flexibility in the standards to allow for alternative parking solutions based on shared mobility, access to alternative modes of transport and active travel. Any application proposing no car parking provision would need to submit evidence to demonstrate that the functional parking needs of the development would be accommodated.</p> <p>It is difficult to insist on very low levels of car ownership in an area like Hart where there is no realistic alternative to the car for many journeys.</p> <p>It is beyond the scope of the SPD to introduce controlled parking zones.</p>

Consultee and rep no.	Issue raised	HDC's draft response
	<p>own car parking spaces. Homes last a long time, so this bias towards car use and all its consequences will be baked in for decades.</p> <p>I accept that there is a problem with pavement parking, but forcing people to buy multiple car parking spaces per home is not the only solution. For example a Controlled Parking Zone.</p> <p>Is this policy document flexible enough that in the future a new development could be created that only provides visitor parking and the residents understand that they can not own a car?</p>	

Table 2: Corrections and clarifications made *not* in response to representations received

Paragraph/section	Change made
Figures 1,2,3,4	Replace with better examples of cycle storage
New paragraph to follow para 5.5	<p>Clarify why there are two options for car parking standards for 3-bed homes:</p> <p><u>For 3-bedroom homes either car parking standard can be used. It is for the applicant to demonstrate which standard is most appropriate and results in the best design solution.</u></p>
Paragraph 7.1 (4)	<p>Correct and clarify 3rd bullet as follows:</p> <ul style="list-style-type: none"> • An assessment of parking activity <u>stress</u> in an identified vicinity of the application site. This needs to be recorded regularly (on a typical day) <u>during the week, within school term time, when the highest number of residents are at home, generally in the late afternoon and evening, and between 6am 11pm and 11pm 6pm</u> one weekday and one weekend day by an independent assessor. The applicant will need to be able to demonstrate that the survey undertaken is fair and representative. <p>Add a new bullet point referring to the new appendix (Appendix 6) on parking stress surveys.</p>
Paragraph 7.1 (5)	<p>For consistency with paragraph 5.25, amend will be amended as follows:</p> <p>5) For developments of more than <u>50 or more</u> homes – evidence of correspondence with a car club operator regarding the feasibility of a car club for the site.</p>
Appendix 3 Non-residential car parking standards Section 5 Care Establishments - public and private	<p>Regarding ‘Residential units for adults with learning difficulties’, under ‘Elsewhere’ there is a duplicate reference to ‘Non-residential staff: 1 space per 2 FTE’. This should refer to: <u>Visitors: 1 space per 4 clients</u></p>