



LEAD MEMBER FOR TRANSPORT AND ENVIRONMENT

DECISIONS to be made by the Lead Member for Transport and Environment,
Councillor Claire Dowling

MONDAY, 20 JANUARY 2020 AT 10.00 AM

COUNCIL CHAMBER - COUNTY HALL, LEWES

AGENDA

- 1 Decisions made by the Lead Cabinet Member on 11 November 2019 (*Pages 3 - 4*)
- 2 Disclosure of Interests
Disclosure by all Members present of personal interests in matters on the agenda, the nature of any interest and whether the Members regard the interest as prejudicial under the terms of the Code of Conduct.
- 3 Urgent items
Notification of any items which the Lead Member considers urgent and proposes to take at the appropriate part of the agenda.
- 4 Proposal for East Sussex parking charges (*Pages 5 - 96*)
Report by the Director of Communities, Economy and Transport
- 5 Countryside Access Strategic Commissioning Strategy: recommendation for future management of Countryside Sites (*Pages 97 - 124*)
Report by the Director of Communities, Economy and Transport
- 6 Any urgent items previously notified under agenda item 3

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10 January 2020

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LEAD MEMBER FOR TRANSPORT AND ENVIRONMENT

DECISIONS made by the Lead Member for Transport and Environment, Councillor Claire Dowling, on 11 November 2019 at County Hall, Lewes

22 DECISIONS MADE BY THE LEAD CABINET MEMBER ON 21 OCTOBER 2019

22.1 The Lead Member approved as a correct record the minutes of the meeting held on 21 October 2019.

23 REPORTS

23.1 Reports referred to in the minutes below are contained in the minute book.

24 IMPLEMENTATION OF THE WELL MANAGED HIGHWAY INFRASTRUCTURE CODE OF PRACTICE AND UPDATE ON HIGHWAY POLICIES

24.1 The Lead Member considered a report by the Director of Communities, Economy and Transport. The Lead Member requested further clarification of the proposed Highway Maintenance – Consideration of Character Policy set out in Appendix 5.

DECISIONS

24.2 The Lead Member RESOLVED to: (1) Approve the implementation and implications of the Well-Managed Highway Infrastructure Code of Practice and subsequently;

(2) Rescind the policies set out at appendix 4 with the exception of PS 7/3 – Maintenance of Footways - Materials;

(3) Defer consideration of the proposed new policy in appendix 5;

(4) Approve the proposed amendments to existing policies as out in appendix 6; and

(5) Delegate authority to the Director of Communities, Economy and Transport, in consultation with the Lead Member for Transport and Environment to make minor amendments if required to the East Sussex Highway Asset Inspection Manual, and appendices, to ensure the effective delivery of the County Council's highway maintenance function.

Reasons

24.3 To ensure that the County Council has clear, consistent and up to date policies describing its approach to managing and maintaining the highway network across the county. To also ensure alignment with the Code, consistency with the County Council's asset management approach and to maximise the Department for Transport's funding allocation.

24.4 The proposed Highway Maintenance – Consideration of Character Policy set out in Appendix 5 will be reported to a future Lead Member meeting.

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Report to: Lead Member for Transport & Environment

Date of meeting: 20 January 2020

By: Director of Communities, Economy and Transport

Title: Proposal for East Sussex Parking Charges

Purpose: To consider the proposed increases to parking pay & display charges and the proposed changes to permit charges.

RECOMMENDATIONS: The Lead Member is recommended to:

- (1) Note the response to the public consultation on increasing parking pay & display charges and the proposed changes to permit charges; and**
 - (2) Approve the proposals:**
 - a. to increase parking pay & display tariffs and permit charges as detailed in Appendix 1; and**
 - b. agree that pay & display tariffs and permit charges across the county should be reviewed annually.**
-

1. Background Information

1.1. Parking management supports a range of transport strategies aimed at influencing travel choice. With increasing car ownership and use, parking pressures add to the traffic management problems experienced by many towns both in terms of congestion on major routes and increases in vehicle emitted pollutants to the detriment of air quality.

1.2. There is strong evidence that air pollution is a cause of both short-term and long-term health effects in susceptible groups, such as the elderly and those with underlying health problems of heart disease or breathing problems. Long-term exposure to air pollutants decreases life expectancy by around 6 months on average, mainly because of the role that small, sooty particles from vehicle exhaust fumes play in lung cancer and heart disease. Air pollution causes many extra admissions to hospital as well as damaging the natural environment. The annual health costs associated with air pollution are estimated to be £15 billion to UK citizens, which is about the same as the health costs of obesity.

1.3. Air pollution also has effects on the natural environment. Ground-level ozone, a common pollutant in East Sussex in the summer months, is formed when pollutants react in sunlight. It can seriously damage crops and vegetation and affect habitats.

1.4. Alongside strategies that aim to encourage more sustainable modes of travel (e.g. car sharing, public transport, cycling or walking), the 'rationing' of the supply of parking can contribute to wider transport planning objectives. The main way in which parking controls are rationed has tended to be by limiting the supply of spaces available to those who elect to commute by car and thereby need to park longer term (often referred to as 'all-day' parking). Highway authorities have traditionally achieved this by means of on-street parking schemes with controls on who is able to park (e.g. short-period single yellow lines or residents-only schemes), maximum stay (e.g. time-limited restrictions) or by pricing (e.g. discourage parking by making it a more expensive option than alternative travel modes). Pricing also tends to be set at a level to encourage use of nearby off-street car parks first and foremost.

1.5. In Eastbourne, Hastings and Lewes, all-day parking is already limited in central parking spaces as charges are levied by means of pay and display or pay by phone. Increases in tariffs are therefore considered to be an important component of continuing support for general transport strategies aimed at encouraging more sustainable forms of travel and to assist with tackling air quality issues generally.

1.6. Parking tariffs have not been increased for over 10 years and the charging regime is therefore having a reduced impact as a demand management tool on influencing travel choices. It is therefore proposed that parking tariffs are increased to influence driver behaviour and encourage them to use alternative sustainable forms of transport.

1.7. Increasing concerns about reductions in air quality are leading to many local authorities setting higher parking prices for higher emission vehicles and some authorities are also investigating traffic management schemes that prohibit certain vehicle emission types altogether in city centres. In Lewes, and to some extent Falmer, the permit price arrangements already include differential pricing to encourage lower emission vehicles for residents' permits, however this is not the case in Eastbourne where it only applies to business permits and no differential exists in Hastings. Officers recommend a consistent approach is introduced across the three towns with an increasing differential to encourage lower emission vehicles. Therefore, it is recommended that the resident permit tariffs charged in Eastbourne and Hastings are changed to follow the Lewes District model for resident permit charges. This links the cost of residents' permits to the CO₂ emissions of pollution from the vehicle the permit covers, with owners of low emission vehicles paying less than those with higher emissions.

1.8. The effective management of parking not only addresses local parking problems, it helps achieve some of the broader transport objectives set out in our Local Transport Plan (LTP3). These include improving road safety, achieving better flows of traffic through town centres improving safety, health and security, improving quality of life, encouraging the use of more sustainable modes of transport reducing damage to the environment and improving the economic viability of areas through the efficient management and use of parking spaces.

1.9. The Traffic Management Act 2004 allows councils, which are also local traffic authorities, to apply to the Secretary of State for Transport for a Civil Enforcement Area Order that allows the de-criminalising of parking enforcement in their area. Under this arrangement, councils can undertake enforcement of all parking restrictions in their area and retain the income received from parking charges and penalties to help fund the costs of parking services, with any resulting surplus being used within the prescribed parameters under the legislation. East Sussex County Council (ESCC) has three Civil Parking Enforcement (CPE) schemes covering Hastings Borough, Lewes District and Eastbourne Borough.

1.10. ESCC is also working with Rother District Council to introduce CPE into Rother District: the proposed changes to parking charges will not apply in the Rother District.

1.11. The expenditure and income for the existing CPE schemes is published in our Annual Reports. Income is received from the sale of various parking permits, Pay and Display (P&D) charges and Penalty Charge Notices (PCN).

1.12. ESCC's statutory power to impose parking charges derives from sections 35 and 34 of the Road Traffic Regulation Act 1984. Under sections 35C and 45A of the same Act ESCC may vary these charges. The changes can be introduced 21 days after the publication of a notice in a newspaper circulating in the area in which the changes are to be introduced.

2. General context of parking charges and tariffs

2.1. Each of the three Controlled Parking Areas were set up some years apart and with varying types of parking provision to satisfy the particular needs of the local community. Although there are similarities between the three areas, there are different levels of charging in each area and the difference is particularly noticeable in the charges for permits. Parking charges are set at a level to ensure that at least the costs of managing, enforcing and administering parking controls are met, and no financial burden is passed on to council tax payers. As a principle, it also conforms to central government guidance that parking schemes should at least be self-financing.

2.2. The level of charging is a vital tool to manage the demand for parking. Whether this is by type of user (e.g. permit user or pay and display), by location (e.g. differential pricing between on-street parking and off-street car parks) or by type of vehicle (e.g. second residents' permits or lower-emission vehicles).

2.3. The effective control of parking is a crucial element of wider transport strategies as set out in the LTP3. It supports the local economy by assisting with the management of congestion and the availability and demand for parking spaces as well as encouraging greater use of more sustainable forms of transport.

2.4. The aims of the proposals include acting as a disincentive to multiple vehicle ownership and a move to encourage greater use of sustainable alternatives, whilst not limiting the availability of permits for those that need them. As such, it is important that charges are set at a level that has some meaningful effect on parking behaviour.

2.5. Charges for on-street parking have not been significantly changed for many years. In Eastbourne and Hastings the charges were last increased in 2008 and in Lewes in 2007. Since then, the Retail Prices Index (RPI) has increased by the order of 35%.

2.6. At the meeting of the Lead Member for Transport and Environment on Monday 17 June, it was agreed to hold a public consultation on the proposed changes to the parking charges in Lewes, Eastbourne and Hastings. Appendix 1 contains the consultation analysis for the proposals for East Sussex parking charges, within this Appendix 1B provides the current and proposed permit charges and Appendix 1C provides the current and proposed pay and display charges across the county.

2.7. The consultation ran from 1 July to 11 August. Appendix 1E provides the public consultation questionnaire. The key changes proposed, which were consulted on, are:

- standardising the price of residents' permits across Lewes, Eastbourne and Hastings for the first time.
- linking the cost of residents' permits to the CO₂ emissions of pollution from the vehicle the permit covers, with owners of low emission vehicles paying less than those with higher emissions. Charges for first permits in Hastings would remain the same or reduce for residents with a vehicle in car tax bands A to F, while the majority of motorists in Eastbourne would pay more for annual permits. The cost of a first permit would be between £15 and £95 per year.
- that the cost of visitor and day permits should be higher in all three scheme areas to encourage people to make more sustainable travel choices.
- increasing the cost of on-street P&D charges to encourage people to use alternative sustainable forms of transport, which will help reduce congestion and improve air quality in our towns. The increase in charges for on-street parking across Eastbourne, Hastings and Lewes would range from 20p to £1.90 per hour depending on the location. Blue Badge holders are not impacted by this proposal as they do not have to pay for on-street parking.
- targeted increases in on-street parking charges in a small number of locations where nearby off-street car park prices have higher charges than on-street prices. This will help encourage people to use car parks first and minimise the pressure on on-street parking in these locations. Blue Badge holders are not impacted by this proposal as they do not have to pay for on-street parking.

3. Public consultation

3.1. The consultation sought to understand the views of residents, businesses and stakeholders on the Council's proposed approach to the management of parking demand across the county through the increase in on-street pay & display parking tariffs and parking permit charges. The consultation also looked to better understand whether these proposed changes would encourage drivers to use sustainable forms of transport and/or to use vehicles that emit lower levels of pollutants. Appendix 1 contains the consultation analysis for the proposals for East Sussex parking charges.

3.2. The majority of feedback to the consultation was submitted via the ESCC Consultation Hub but responses were also received via the dedicated consultation email address: parking.consultations@eastsussex.gov.uk. Parking reviews in Eastbourne and Lewes were also running at the same time as the Proposal for East Sussex Parking Charges, comments relating to these proposals were submitted and have been included within the comments of this consultation. Two petitions were also received as part of the consultation process. Copies of all the verbatim

responses received as part of the consultation have been placed in the Members' room. The total number of consultation responses received is:

Online Questionnaire	Emails/Letters	Petitions
2161	40	2

3.3. The consultation questionnaire has received a large majority of responses from residents of Eastbourne (76.1%), followed by Lewes (13.8%) and Hastings (7.6%). Analysis of those responses where a postcode was given showed that around 2.5% of respondents were from outside the county.

3.4. When considering the environmental aspects of the consultation:

- 54.33% of respondents indicated they strongly agreed or agreed the Council should take measures to reduce congestion in our town centres.
- 66.64% of respondents strongly agreed or agreed the Council should take measures to improve local air quality and reduce vehicle emissions.
- 57.75% of respondents strongly agreed or agreed the Council should take measures to encourage the use of more sustainable modes of transport and use vehicles that emit lower levels of pollution.

3.5. When considering parking habits and the cost of parking in our town centres there was varying opinion:

- 65.43% of respondents strongly agreed or agreed that the cost of parking charges influence where people park.
- 50.48% of respondents strongly agreed or agreed the cost of off-street parking should be lower than that of on-street parking.
- 38.6% of respondents strongly agreed or agreed that less polluting vehicles should pay less for the resident permit compared to 40.35% who disagreed or strongly disagreed.
- Only 12.08% of respondents strongly agreed or agreed permit charges should be aligned with those in Lewes compared to 59.6% who disagreed or strongly disagreed.

3.6. The consultation also proposed changes to day permits with 10.04% of respondents indicating they strongly agreed or agreed the cost should increase compared to 74.46% respondents indicating they disagree or strongly disagree.

3.7. The consultation sought to understand local opinion on proposed increase to on-street pay and display charges, 11.48% respondents indicated they strongly agreed or agreed with 82.37% of respondents indicating they disagreed or strongly disagreed with the proposed increases.

3.8. The questionnaire responses also indicated 84.96% of the respondents did not have any type of permit.

3.9. Following analysis of the questionnaire responses which included additional comments and alternative suggestions to help reduce congestion and air quality, it is evident that the main point of concern is the negative economic impact the proposed charges will have on the town centres. The top ten additional themed comments were identified as follows:

Rank	Comment Theme	Final Quantity
1	Concerned about the negative effect (mainly economic) on the area	614
2	Need to improve buses and bus services - mainly around cost, reliability, availability	568
3	Alternative parking (regulation and pricing) suggestions	282
4	Need to improve railways and rail services - mainly around cost and reliability	280
5	Need to develop Park & Ride services	249
6	This is just a stealth tax / just a revenue making proposal	178
7	Cycling related comments - more / better cycle lanes and priorities needed	158

8	After investing in the development in Eastbourne (The Beacon), it would be counter productive to increase charges	150
9	General comments about the difficulties presented by roadworks, and the need to improve road links	136
10	It's unfair to compare the three areas as they have different parking requirements and are demographically different	114

3.10. The consultation questionnaire attracted 2,161 responses in total, with 1,704 completing the open text comment box. The full response to the top ten comments is contained in Appendix 1.

3.11. All of the responses, comments and feedback received as part of the consultation process have been read and considered to help inform the recommendations in this report.

3.12. Proposals relate to on-street parking places, they do not extend to off-street car parks anywhere in the county. As the Highway Authority ESCC encourages the use of off-street car parks to help minimise journeys, congestion and any environmental impacts within our town centres. The proposed increase in on-street parking charges will also help to encourage greater use of more sustainable transport options which include bus travel, walking and cycling. There is little published evidence which demonstrates a direct correlation between changes in parking charges and changes in town centre footfall. Other factors will have an influence on people's choice on where they shop or access services and, therefore, the level of footfall in a town centre. These include the amount and availability of paid and free parking; the cost and quality of off-street parking; the accessibility of the town centre by different transport modes (e.g. by train, bus etc); and most fundamentally the quality of the retail, leisure and services on offer.

3.13. The management of parking, including through appropriate charging, is an important part of the demand management toolkit in the LPT3 which complements the investment we are making to improve travel choices which encourage the use of walking, cycling and public transport in East Sussex, with the overall aim of supporting sustainable economic growth.

3.14. Charging at a sufficient level to impact driver behaviour, can bolster the local economy by encouraging a 'churn' of visitors and shoppers, rather than spaces being occupied by a single user for a long period of time. It should also encourage drivers to:

- consider how they travel and whether it is alternative mode of travel – walk, cycle, bus or train
- park in off-street car parks,

3.15. ESCC has reviewed the number of on-street parking spaces that would be affected by the proposals compared to the number of off-street parking spaces in the town centres. In Eastbourne, of the 2,008 on-street parking spaces which provide pay and display parking 425 parking spaces in the town centre (Zone A and Zone G), those within a short walking distance of the main retail area, will be most affected by the proposals. As an alternative to parking on-street there are 1,718 off-street parking places in the Railway Station, Beacon, Junction Road and Hyde Gardens car parks that will offer cheaper and longer stay parking. The proposals seek to encourage visitors to utilise the off-street parking places which will help to reduce vehicle movements in the town centre and in turn reduce air pollution.

3.16. In Lewes, of the 1,084 on-street parking spaces that provide pay & display parking; of these 149 parking spaces in the town centre, close to the local amenities will see the highest increase in the parking charges. As an alternative there are 706 parking spaces in 12 off-street car parks within walking distance of the town centre which will offer cheaper and longer stay parking.

3.17. In Hastings 463 pay and display parking spaces across the town centre will be affected by the proposed increases, as an alternative there are 2,749 off-street parking spaces in 16 car parks across the town centre which will offer cheaper and longer stay parking options. There are also 31 pay and display coach parking spaces in the town centre. There are a further 127 off-street parking spaces in St. Leonards.

3.18. The above analysis demonstrates that the majority of car parking capacity in Eastbourne, Lewes and Hastings is in off-street car parks. So, the proposed increases to Pay and Display charges should not have a detrimental impact on the economic viability of these towns. The proposals are

intended to encourage, wherever possible, visitors to use the off-street parking facilities, but also provide all day parking where there is limited off-street parking provision.

3.19. Offering a discount based on the vehicle emissions resident parking permits can help to encourage greater use of less polluting vehicles which will help to reduce harmful emissions and improve air quality in our town centres and across the county. The proposals for the on-street parking charges aim to encourage greater use of off-street car parks, reduce the number of vehicles driving on our town centre roads searching for parking spaces and aim to encourage greater use of alternative modes of transport which in turn will reduce harmful emissions and improve air quality. These outcomes will make these towns a more appealing place to work, live and visit and thereby boost the local economy.

3.20. The Place Scrutiny Committee has considered the proposals and any comments will be included with the Lead Member meeting papers as a separate note for consideration by the Lead Member.

4. Equality Impact Assessment

4.1. Members must have 'due regard' to the duties set out in Section 149 of the Equality Act 2010 (the Public Sector Equality Duty or PSED).

4.2. An Equalities Impact Assessment (EqIA) (Appendix 2) has been carried out to identify adverse impacts that may arise as a result of the proposals for those with protected characteristics. This assessment details potential actions to help minimise, avoid or mitigate negative impacts of the proposals. The Lead Member must read the Equalities Impact Assessment and take its findings into consideration when determining these proposals.

4.3. ESCC received no direct complaints about the proposed parking charges discriminating against anyone with a protected characteristic.

4.4. The EqIA has considered the impact of the proposals on different groups. ESCC considers that by delivering these proposals and with the general provisions of the parking schemes as a whole, it is meeting its statutory duties under the Traffic Management Act, Local Transport Plan, the Equalities Act 2010 and its commitment to improve the environment.

4.5. The proposals have been developed to avoid a disproportionate impact on current users while helping to continue meeting the costs of the parking schemes. The proposed changes to on-street parking charges (including permits) do not alter the nature of the provisions of the parking service.

4.6. The proposals do not change any concessions currently afforded to Blue Badge holders. People of all ages who park in an area of the CPE scheme where charges apply will be impacted by the increased charges. Retired people may have less disposable income to be able to pay the increased parking charges, but also have access to free bus travel. Children and young people under the age of 17 who do not drive will not be directly impacted by the proposals.

4.7. The proposals are not expected to have any specific impact on individuals from different ethnic backgrounds as it is considered that the service will continue to meet or support the needs of current and future users, regardless of ethnicity.

4.8. The proposals are not expected to have any specific impact on individuals or organisations that provide care as the service will continue to meet or support the needs of current and future users. An increase to the cost of carer permits may impact some carers.

5. Implementation

5.1. If the proposals are approved the Parking Team will draft the Notice of Variation that will be advertised in the Eastbourne Herald, Sussex Express and Hastings Observer for a minimum of 21 days. All permit holders, Councillors and Stakeholders will receive notification along with copies of the notices displayed in prominent positions in every road which has a bay that is affected across all three CPE areas.

5.2. If the proposals are approved the new charging regime should be operational by the end of April 2020.

6. Conclusions and Reasons for Recommendations

- 6.1. A total of 2,161 responses were received via the online consultation hub, a further 32 comments relating to the proposals were submitted via the Eastbourne Parking Review consultation that was running at the same time. 40 email responses were received via the parking.consultation@eastsussex.gov.uk email address, two petitions were also received relating to the proposed parking charges increases, one specific to Lewes and one specific to Eastbourne and two parish councils responded to the consultation
- 6.2. There appears to be strong support for ESCC to introduce measures to reduce traffic congestion in our town centres. The proposed increase to parking charges will help to reduce vehicle trips and encourage greater use of sustainable modes of transport.
- 6.3. Concerns about the local air quality of our town centres were identified through the online questionnaire with almost two thirds of respondents indicating they feel ESCC should take measures to improve air quality across the county. Incentives such as a reduced resident parking permit for the least polluting vehicles will encourage a modal shift to electric vehicles.
- 6.4. Over half of respondents to the online questionnaire indicated measures should be taken by ESCC to encourage more sustainable modes of transport across the county.
- 6.5. The responses suggest almost two thirds of respondents feel parking charges do influence where people park.
- 6.6. Just over half of the respondents felt off-street parking charges should be lower than those on-street.
- 6.7. There was no clear majority from the responses that either agreed or disagreed with aligning permit charges or discounting less polluting vehicles. This may be due to the low number of permit holders that responded to the consultation just 6% of all current resident permit holders. By offering a reduction in the permit charge based on vehicle CO₂ emissions ESCC can help to encourage greater use and ownership of less polluting vehicles in Eastbourne, Hastings and Lewes which in turn will help to reduce pollution in our town centres. Introducing such an incentive will help to achieve one of the main objectives set out in the LTP3 which is to reduce air pollution across the county.
- 6.8. The responses to the proposed increases to visitor and day permit charges suggest there is not widespread support for increasing these charges. The purpose of the proposed increase is to encourage greater use of sustainable modes of transport wherever possible, using alternative modes of transport will help to reduce vehicle congestion and pollution in the town centres. The level of the proposed day permits still represent good value for money, for example resident visitor day permits only increase to £1.20 per day in Lewes and Eastbourne. The proposed increase for hotel parking permits will still offer value for money and will be cheaper than the standard on-street parking charge. For example, in Eastbourne the proposed cost of this permit would be £2 per day. The terms of use of the hotel permit is not changing and all vehicles will be permitted to park until 11 am the following day. The relatively low cost of this permit will continue to assist in helping to boost the visitor economy to East Sussex.
- 6.9. The majority of respondents suggested they did not support the proposed increase to on-street pay and display charges. Parking charges have remained static since they were first introduced, and therefore the proposed new tariffs not only take account of the RPI increase during that time (of approximately 35%) but also reflect the impact of increasing car use in the intervening period, changes to controlled parking zones and other changes through our parking review process.
- 6.10. The proposed tariffs will also help to address issues of air quality by reducing congestion in our town centres through better demand management and increasing the churn of vehicles. In addition, the proposed tariff increases will incentivise the use of alternative means of transport such as active travel, which will contribute to the wider carbon emissions reductions which are part of a suite of measures to support East Sussex become net carbon zero by 2050.
- 6.11. The increase in charges for on-street parking across Eastbourne, Hastings and Lewes would range from 20p to £1.90 per hour depending on the location. Blue Badge holders are not impacted by this proposal as they do not have to pay for on-street parking.
- 6.12. The majority of the comments submitted via the online questionnaire or email indicated that respondents felt the proposed increases to parking charges would have a negative effect on the local

economy and would contribute to even harder times for the High Street. ESCC do not agree that the proposals will have a negative effect on the local economy. Whilst there is often anecdotal evidence there is little published evidence which demonstrates a direct correlation between changes in car park charges and changes in town centre footfall. Charging at a sufficient level to impact driver behaviour, can bolster the local economy by encouraging a 'churn' of visitors and shoppers, rather than spaces being occupied by a single user for a long period of time. The proposals for the on-street parking charges aim to encourage greater use of off-street car parks, reduce the number of vehicles driving on our town centre roads searching for parking spaces and aim to encourage greater use of alternative modes of transport which in turn will reduce harmful emissions and improve air quality. These outcomes will make these towns a more appealing place to work, live and visit and thereby boost the local economy.

6.13. As alternative options to the proposals for parking charges, many respondents suggested that the public transport offer could be improved if more people are to change to more sustainable modes of transport, this included the frequency and reliability of bus services and improved cycle routes and cycle storage across the county. The cost of using public transport was also a popular issue. A significant part of the LTP3 Strategy and future direction for East Sussex is to implement infrastructure to support integrated sustainable travel – walking, cycling, public transport, car sharing etc. For example – bus priority measures, cycle lanes and facilities, improvements to pedestrian routes to key trip attractors, better rail / bus /cycle interchanges, less street clutter and enhanced public spaces. ESCC cannot set rail fares or increase the frequency of rail services. It will continue to lobby and work with the rail network to provide as best a service as possible to ensure our town centres are accessible and continue to be a desired destination for our many visitors. With the ongoing pressure on Council budgets, any future Parking Surplus, excluding existing commitments, could be used as a further contribution towards ESCC's public transport costs. The investment in these activities is complimentary to the objectives of the LTP3 in the provision of sustainable transport which assists in reducing congestion and improving air quality in the county. However, these improvements alone will not enable the change in behaviour that the proposals to parking tariffs is seeking to achieve.

6.14. In order to achieve our objective of influencing driver behaviour and encourage people to use alternative sustainable forms of transport, additional tariff increases are likely to be required. It is proposed that any further increases to Parking Tariffs will be reviewed as part of the annual review of fees and charges.

6.15. We have considered all the feedback and concerns received during the consultation process and do not feel that the proposals should be withdrawn as a result of the information received.

6.16. Lead Member is therefore recommended to agree the recommendations in this report.

RUPERT CLUBB

Director of Communities, Economy and Transport

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LOCAL MEMBERS

All members whose electoral divisions are within areas with on-street parking charges in Eastbourne and Hastings Borough and Lewes District.

BACKGROUND DOCUMENTS

None

Lead Member Transport and Environment

20 January 2020 Appendix 1

**Proposals for East Sussex Parking Charges Consultation
Analysis**

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1 Executive Summary

- 1.1 Each of the three controlled parking areas were introduced some years apart and with varying types of parking provision to satisfy the needs of the local community. Although there are similarities between the three areas, there are different levels of charging in each area and the difference is particularly noticeable in the charges for permits.
- 1.2 The level of charging is a vital tool to manage the demand for parking. Whether this is by type of user (e.g. permit user or pay and display), by location (e.g. differential pricing between on-street parking and off-street car parks) or by type of vehicle (e.g. second residents' permits or lower-emission vehicles).
- 1.3 The effective control of parking is a crucial element of wider transport strategies as set out in our Local Transport Plan (LTP3). It supports the local economy by assisting with the management of congestion and the availability and demand for parking spaces as well as encouraging greater use of more sustainable forms of transport.
- 1.4 The aims of the proposals include acting as a disincentive to multiple vehicle ownership and a move to encourage greater use of sustainable alternatives, whilst not limiting the availability of permits for those that need them. As such, it is important that charges are set at a level that has some meaningful effect on parking behaviour.
- 1.5 Charges for on-street parking have not been significantly changed for many years. In Eastbourne and Hastings the charges were last increased in 2008 and in Lewes in 2007.
- 1.6 The key changes proposed, which were consulted on, are:
 - standardising the price of residents' permits across Lewes, Eastbourne and Hastings for the first time.
 - linking the cost of residents' permits to the CO₂ emissions of pollution from the vehicle the permit covers, with owners of low emission vehicles paying less than those with higher emissions. Charges for first permits in Hastings would remain the same or reduce for residents with a vehicle in car tax bands A to F, while the majority of motorists in Eastbourne would pay more for annual permits. The cost of a first permit would be between £15 and £95 per year.
 - that the cost of visitor and day permits should be higher in all three scheme areas to encourage people to make more sustainable travel choices.
 - increasing the cost of on-street P&D charges to encourage people to use alternative sustainable forms of transport, which will help reduce congestion and improve air quality in our towns. The increase in charges for on-street parking across Eastbourne, Hastings and Lewes would range from 20p to £1.90 per hour depending on the location. Blue Badge holders are not impacted by this proposal as they do not have to pay for on-street parking.
 - targeted increases in on-street parking charges in a small number of locations where nearby off-street car park prices have higher charges than on-street prices. This will help encourage people to use car parks first and minimise the pressure on on-street parking in these locations. Blue Badge holders are not impacted by this proposal as they do not have to pay for on-street parking.
- 1.7 The reasons for proposing increased parking charges comprises several environmental aspects which includes improving air quality in our town centres, reducing congestion in our town centres and encouraging the county's population to use more sustainable modes of transport, whilst encouraging greater use of the town

centre off street car parks. Permit and pay and display charging structures are a useful and effective way to encourage a switch to less polluting vehicles and to encourage people to make more sustainable travel choices.

- 1.8 Appendix 1B provides the current and proposed permit charges and Appendix 1C provides the current and proposed P&D charges across the County.
- 1.9 During the consultation, respondents were invited to have their say on the proposed changes listed above, by completing a consultation questionnaire via the online consultation hub. A total of 2,161 people responded to the questionnaire: 2,155 completed it online and six respondents completed a paper version.
- 1.10 Emails were also received by the Council's Parking Team directly with comments relating to the proposals, 40 representations via email were received which included 11 attached letters regarding the proposed changes from members of the public, organisations and MPs. Two Parish Councils also responded to this consultation.
- 1.11 There were also two petitions received against the proposed changes to parking charges, totalling 4,838 signatures, one petition was submitted by a parish councillor for Lewes and one petition was submitted by a local MP and Councillor in Eastbourne. Neither of the petitions provided a response to the questions in the consultation.
- 1.12 All of the comments, feedback and suggestions received during the consultation have been analysed and have helped to inform the final proposals for presentation to East Sussex County Council's Lead Member for Transport and Environment on 16 December 2019.
- 1.13 The response to the consultation questionnaire has received a large majority of responses from residents of Eastbourne (76.1%) followed by Lewes (13.8%) and Hastings (7.6%). Analysis of those responses where a postcode was given showed that around 2.5% of respondents were from outside the County.
- 1.14 When considering the environmental aspects of the consultation:
 - 54.33% of respondents indicated they strongly agreed or agreed the Council should take measures to reduce congestion in our town centres.
 - 66.64% of respondents strongly agreed or agreed the Council should take measures to improve local air quality and reduce vehicle emissions.
 - 57.75% of respondents strongly agreed or agreed the Council should take measures to encourage the use of more sustainable modes of transport and use vehicles that emit lower levels of pollution.
- 1.15 When considering parking habits and the cost of parking in our town centres there was varying opinion:
 - 65.43% of respondents strongly agreed or agreed that the cost of parking charges influence where people park.
 - 50.48% of respondents strongly agreed or agreed the cost of off street parking should be lower than that of on street parking.
 - 38.6% of respondents strongly agreed or agreed that less polluting vehicles should pay less for the resident permit compared to 40.35% who disagreed or strongly disagreed.
 - Only 12.08% of respondents strongly agreed or agreed permit charges should be aligned with those in Lewes compared to 59.6% who disagreed or strongly disagreed.

- 1.16 The consultation also proposed changes to day permits with 10.04% of respondents indicating they strongly agreed or agreed the cost should increase compared to 74.46% respondents indicating they disagree or strongly disagree.
- 1.17 The consultation sought to understand local opinion on proposed increase to on street pay and display charges, 11.48% respondents indicated they strongly agreed or agreed with 82.37% of respondents indicating they disagreed or strongly disagreed with the proposed increases.
- 1.18 The questionnaire responses also indicated 84.96% of the respondents did not have any type of permit.
- 1.19 Following analysis of the questionnaire responses which included additional comments and alternative suggestions to help reduce congestion and air quality, it is evident that the main point of concern is the negative economic impact the proposed charges will have on the town centres. The top ten additional themed comments were identified as follows:

Rank	Comment Theme
1	Concerned about the negative effect (mainly economic) on the area
2	Need to improve buses and bus services - mainly around cost, reliability, availability
3	Alternative parking (regulation and pricing) suggestions
4	Need to improve railways and rail services - mainly around cost and reliability
5	Need to develop Park & Ride services
6	This is just a stealth tax / just a revenue making proposal
7	Cycling related comments - more / better cycle lanes and priorities needed
8	After investing in the development in Eastbourne (The Beacon), it would be counterproductive to increase charges
9	General comments about the difficulties presented by roadworks, and the need to improve road links
10	It's unfair to compare the three areas as they have different parking requirements and are demographically different

- 1.20 Proposals relate to on street parking places, they do not extend to off street car parks anywhere in the county. As the Highway Authority East Sussex County Council encourage the use of off-street car parks to help minimise journeys, congestion and any environmental impacts within our town centres. The proposed increase in on street parking charges will also help to encourage greater use of more sustainable transport options which include bus travel, walking and cycling. There is little published evidence which demonstrates a direct correlation between changes in parking charges and changes in town centre footfall. Other factors will have an influence on people's choice on where they shop or access services and, therefore, the level of footfall in a town centre. These include the amount and availability of paid and free parking; the cost and quality of off-street parking; the accessibility of the town centre by different transport modes (e.g. by train, bus etc); and most fundamentally the quality of the retail, leisure and services on offer.

- 1.21 The management of parking, including through appropriate charging, is an important part of the demand management toolkit in the LTP3 which complements the investment the Council is making to improve travel choices which encourage the use of walking, cycling and public transport in East Sussex, with the overall aim of supporting sustainable economic growth.
- 1.22 Charging at a sufficient level to impact driver behaviour, can bolster the local economy by encouraging a 'churn' of visitors and shoppers, rather than spaces being occupied by a single user for a long period of time. It should also encourage drivers to:
- consider how they travel and whether it is alternative mode of travel – walk, cycle, bus or train
 - park in off street car parks,
- 1.23 The Council have reviewed the number of on street parking spaces that would be affected by the proposals compared to the number of off street parking spaces in the town centres. In Eastbourne, of the 2,008 on street parking spaces which provide pay and display parking 425 parking spaces in the town centre (Zone A and Zone G), those within a short walking distance of the main retail area, will be most affected by the proposals. As an alternative to parking on street there are 1,718 off street parking places in the Railway Station, Beacon, Junction Road and Hyde Gardens car parks that will offer cheaper and longer stay parking. The proposals seek to encourage visitors to utilise the off street parking places which will help to reduce vehicle movements in the town centre and in turn reduce air pollution.
- 1.24 In Lewes, of the 1,084 on street parking spaces that provide pay & display parking; of these 149 parking spaces in the town centre, close to the local amenities will see the highest increase in the parking charges. As an alternative there are 706 parking spaces in 12 off street car parks within walking distance of the town centre which will offer cheaper and longer stay parking.
- 1.25 In Hastings 463 pay and display parking spaces across the town centre will be affected by the proposed increases, as an alternative there are 2,749 off street parking spaces in 16 car parks across the town centre which will offer cheaper and longer stay parking options. There are also 31 pay and display coach parking spaces in the town centre. There are a further 127 off street parking spaces in St. Leonards.
- 1.26 The above analysis demonstrates that the majority of car parking capacity in Eastbourne, Lewes and Hastings is in off street car parks. So, the proposed increases to Pay and Display charges should not have a detrimental impact on the economic viability of these towns. The proposals are intended to encourage wherever possible, visitors to use the off street parking facilities but also provide all day parking where there is limited off street parking provision.
- 1.27 Offering a discount based on the vehicle emissions resident parking permits can help to encourage greater use of less polluting vehicles which will help to reduce harmful emissions and improve air quality in our town centres and across the county. The proposals for the on street parking charges will encourage greater use of off street car parks, reduce the number of vehicles driving on our town centre roads searching for parking spaces and aim to encourage greater use of alternative modes of transport which in turn will reduce harmful emissions and improve air quality. These outcomes aim to make these towns a more appealing place to work, live and visit and thereby boost the local economy.
- 1.28 Following analysis of consultation responses and comments, we do not consider that the new information has been presented that would lead us to withdraw our proposals.

2. Introduction

- 2.1 The public consultation was undertaken by the County Council between 1 July and 11 August 2019 on proposed changes to on street parking charges across East Sussex. The reason for the proposed changes includes a number of environmental aspects which includes improving air quality in our town centres, reducing congestion in our town centres and encouraging the county's population to use more sustainable modes of transport, whilst encouraging greater use of the town centre off street car parks.
- 2.2 Charges for on street parking have not been significantly changed for many years In Eastbourne and Hastings the charges were last subject to an increase in 2008 and in Lewes in 2007.
- 2.3 The County Council's Local Transport Plan 2011 - 2026 (LTP3) sets out the Council's vision and objectives which include tackling climate change and improving accessibility and enhancing social inclusion.
- 2.4 To help achieve the aims of LTP3, a number of changes were proposed, including:
- standardising the price of residents' permits across Lewes, Eastbourne and Hastings for the first time.
 - linking the cost of residents' permits to the CO₂ emissions from the vehicle the permit covers, with owners of low emission vehicles paying less than those with higher emissions.
 - we propose that the cost of day permits should be higher in all three scheme areas to encourage people to make more sustainable travel choices.
 - increasing the cost of on-street pay and display charges to encourage people to use alternative sustainable forms of transport, which will help reduce congestion and improve air quality in our towns.
 - targeted increases in on-street parking charges in a small number of locations where nearby off-street car park prices have higher charges than on-street prices. This will help encourage people to use car parks first and minimise the pressure on on-street parking in these locations.
- 2.5 Two external consultancy companies were appointed to assist with the delivery of this consultation, Project Centre, locally based transportation consultancy provided project management services and MCL, a locally-based transport and research consultancy, provided data processing and analysis services of the consultation comments in support of the consultation. This report is produced by the County Council in conjunction with Project Centre and MCL.
- 2.6 This report provides a complete analysis of all of the consultation questionnaires completed. It also includes the Council's response to the main issues raised in questionnaire responses and other forms of representations (e.g. email and letter). Section 5 of the report also provides a summary of the representations from key stakeholders made outside of the consultation questionnaire.

- 2.7 A range of methods and media were used to publish and advertise the consultation, to try to ensure that as many people as possible were encouraged and able to give their views. The intention was to ensure participation from a wide range of interested members of the local population and representative groups.
- 2.8 The publicity included
- a press release,
 - a letter sent to all permit holders via the NSL Apply system,
 - notices on all pay and display machines across the county,
 - a text message reminder of the consultation was sent to all RingGo customers who had completed a parking transaction in the county in the previous 12 months and who had previously agreed to receive 3rd party marking information
 - and promotion on the County Council's website and via social media.
- 2.9 Various stakeholders were emailed directly to notify them of the proposals and the consultation, encouraging them to respond via the survey or in writing. These included the County, District and Borough Councils and councillors, Town and Parish Councils, MPs, and public sector organisations (see Appendix A of this report).
- 2.10 The priorities and proposals were set out in the introduction to the consultation questionnaire, which is reproduced in full in Appendix E of this report. The questionnaire was available in different formats upon request, and included seven sections as follows:
- Permit prices to encourage lower emissions vehicles;
 - Align Resident permit charges in Eastbourne and Hastings with those in Lewes ;
 - Business permit charge increase;
 - Visitor and other permit price variations in different towns;
 - Increase to on street parking charges;
 - Increase to pay and display near off street car parks;

3. The Consultation Process

- 3.1 The consultation sought to understand people’s views on the Council’s proposed approach to the management of parking demand across the county through the increase in on-street pay & display parking tariffs and parking permit charges. The consultation also looked to better understand whether these proposed changes would encourage drivers to use more sustainable forms of transport and/or to use vehicles that emit lower levels of pollutants. The following section provides the analysis of responses received and the level of support for the proposed changes. The consultation ran from 1 July to 11 August. The consultation questionnaire can be found in Appendix E of this report.
- 3.2 The overall responses to each of the questions asked are summarised below – questions 4 to 15 relating to the respondent’s views regarding the proposals being put forward.
- 3.3 Further questions (16 to 26) provide demographic and other personal information to assist in analysis and interpretation of the results are included in section 6, ‘About You - Classification of Respondents’.
- 3.4 The majority of feedback to the consultation was submitted via the ESCC Consultation Hub but responses were also received via the dedicated consultation email address: parking.consultations@eastsussex.gov.uk Petitions were also received as part of the consultation process. The total number of consultation responses received is:

Online Questionnaire	Emails/Letters	Petitions
2161	40	2

- 3.5 There were also 32 responses received via the Eastbourne parking review consultation that ran at the same time as the Proposal for East Sussex Parking Charges, six respondents replied to both consultations. We identified six duplicate responses, by this we mean the same individual replied to both consultations with the same response. Only one of each of the duplicate responses has been considered as part of this consultation.
- 3.6 The questionnaire was split into two specific sections, the environmental aspect and the parking charges aspect.
- 3.7 The first part of the analysis considers the opinions of the consultees concerning environmental issues faced across the county and what support there is for the County Council to introduce measures to help combat air pollution whilst also encouraging a modal shift to alternative modes of transport.
- 3.8 The second part of the analysis considers the opinions of the consultees concerning the proposed increase in parking charges across the county, with the emphasis on increasing the charges to encourage changes to parking habits and a greater take up of less polluting vehicles.

4. Consultation Questions

The first part of the consultation questionnaire asked a range of questions relating to environmental issues for the purpose of determining if there is support for the County Council to introduce measures to help improve the local environment across the county.

Reducing Traffic Congestion

Question 4: To what extent do you agree that East Sussex County Council should take measures to assist in reducing traffic congestion in our town centres?

Option	Total	Percent
Strongly agree	405	18.74%
Agree	686	31.74%
Neither agree or disagree	489	22.63%
Disagree	322	14.90%
Strongly disagree	259	11.99%
Not Answered	0	0%
Total Responses	2,161	100%

Summary of responses:

50.48% of all responses indicated they either strongly agree or agree that ESCC should take measures to assist in reducing traffic congestion in our town centres.

22.63% neither agreed or disagreed.

26.09% of responses disagreed or strongly disagreed accounted for.

Improve Local Air Quality and Reduce Vehicle Emissions

Question 5: To what extent do you agree that East Sussex County Council should take measures to improve local air quality and reduce vehicle emissions?

Option	Total	Percent
Strongly agree	565	26.15%
Agree	875	40.49%
Neither agree or disagree	428	19.81%
Disagree	134	6.20%
Strongly disagree	159	7.36%
Not Answered	0	0.00%
Total Responses	2,161	100%

Summary of Responses:

66.64% of respondents indicated they strongly agreed or agreed ESCC should take measures to improve local air quality and reduce vehicle emissions.

19.81% of responses indicated they neither agreed or disagreed.

13.56% responded they disagreed or strongly disagreed accounted for of responses.

Use of More Sustainable Modes of Transport

Question 6: To what extent do you agree that East Sussex County Council should take measures to encourage people to use more sustainable forms of transport and/or to use vehicles that emit lower levels of pollutants?

Option	Total	Percent
Strongly agree	467	21.61%
Agree	781	36.14%
Neither agree or disagree	469	21.70%
Disagree	241	11.15%
Strongly disagree	203	9.39%
Not Answered	0	0%
Total Responses	2,161	100%

57.75% of respondents indicated they either strongly agree or agree that East Sussex County Council should take measures to encourage people to use more sustainable forms of transport and/or to use vehicles that emit lower levels of pollutants.

21.70% of all responses indicated they neither agree nor disagree.

20.54% of respondents either strongly disagreed or disagreed.

The second part of the questionnaire asked a range of questions based on the proposed increase in on street parking charges to determine if there was support for the proposals and to understand the current perception of how parking charges influence parking habits across the county.

Parking Charges Influence Where People Park

Question 7: To what extent do you agree that the cost of the existing parking charges influences where people park?

Option	Total	Percent
Strongly agree	795	36.79%
Agree	619	28.64%
Neither agree or disagree	312	14.44%
Disagree	235	10.87%
Strongly disagree	200	9.25%
Not Answered	0	0.00%
Total Responses	2,161	100%

65.43% of respondents either strongly agreed or agreed that the cost of existing parking charges do influence where people park.

14.44% of respondents neither agreed nor disagreed.

20.12% disagreed or strongly disagreed.

Charges in Off Street Car Parks Should be lower than On Street Charges

Question 8: To what extent do you agree that charges in off-street car parks should be lower than adjacent on-street parking charges to encourage more people to park off-street where possible and assist keeping traffic flowing more freely on the surrounding roads?

Option	Total	Percent
Strongly agree	405	18.74%
Agree	686	31.74%
Neither agree or disagree	489	22.63%
Disagree	322	14.90%
Strongly disagree	259	11.99%
Not Answered	0	0%
Total Responses	2,161	100%

50.48% of respondents indicated they strongly agreed or agreed that off street parking charges should be lower than those on street, to encourage more people to park in car parks.

22.63% of respondents neither agreed nor disagreed that off street charges should be cheaper.

26.89% of respondents either disagreed or strongly disagreed.

Less Polluting Vehicles Should Benefit from Reduced Permit Charges

Question 9: To what extent do you agree that people who use less polluting vehicles should pay less for their resident permit?

Option	Total	Percent
Strongly agree	318	14.72%
Agree	516	23.88%
Neither agree or disagree	455	21.06%
Disagree	433	20.04%
Strongly disagree	439	20.31%
Not Answered	0	0%
Total Responses	2,161	100%

Opinion regarding lower charges for permits for less polluting vehicles did not provide a clear majority.

38.6% of responses strongly agreed and agreed

21.06% neither agree or disagree.

40.35% of responses indicated they disagreed or strongly disagreed.

All Permit Charges Should Be Aligned Across the County

Question 10: To what extent do you agree with the proposals that people living in Eastbourne and Hastings should pay the same for their resident permit as those who live in Lewes?

Option	Total	Percent
Strongly agree	105	4.86%
Agree	156	7.22%
Neither agree or disagree	612	28.32%
Disagree	457	21.15%
Strongly disagree	831	38.45%
Not Answered	0	0%
Total Responses	2,161	100%

Permit charges for Eastbourne and Hastings are proposed to be increased to match those in Lewes.

12.08% of respondents strongly agreed or agreed that permit charges should be brought into line with Lewes.

21.15% of respondents neither agreed or disagreed.

59.60% of respondents disagreed or strongly disagreed.

Changes to Visitor and Day Permit Charges

Question 11: To what extent do you agree with the proposed changes to visitor and day permit charges?

Option	Total	Percent
Strongly agree	75	3.47%
Agree	142	6.57%
Neither agree or disagree	335	15.50%
Disagree	419	19.39%
Strongly disagree	1190	55.07%
Not Answered	0	0%
Total Responses	2,161	100%

10.04% of respondents strongly agreed or agreed that there should be an increase in visitor and day permit charges.

15.50% neither agreed or disagreed.

74.46% of respondents either disagreed or strongly disagreed.

Changes to On Street Parking Charges

Question 12: To what extent do you agree with the proposed increases to on-street Pay & Display parking charges?

Option	Total	Percent
Strongly agree	97	4.49%
Agree	151	6.99%
Neither agree or disagree	133	6.15%
Disagree	326	15.09%
Strongly disagree	1454	67.28%
Not Answered	0	0%
Total Responses	2,161	100%

11.48% of respondents indicated they strongly agreed or agreed with the proposed increase to on street Pay & Display parking charges.

6.15% of respondents neither agreed nor disagreed

82.37% of respondents indicated they either disagreed or strongly disagreed.

Questionnaire Summary

- 4.1 The responses to the questionnaire indicate there is generally widespread support for the reduction of traffic and traffic movements in our town centres which contribute to congestion and high levels of air pollution for which the introduction of measures to help reduce air pollution are supported.
- 4.2 As stated in LTP3, 80% of air pollution across the county is generated by road traffic which is the fastest growing source of greenhouse gases and Carbon Dioxide (CO₂) affecting human and environmental health.
- 4.3 A specific objective of LTP3 is to reduce congestion by improving the efficiency of the transport network and encouraging greater use of sustainable modes of transport.
- 4.4 Taking measures to reduce congestion will contribute to improving the health of our residents and visitors and improving the local environment whilst also encouraging use of healthier transport options.
- 4.5 Parking charges can and do generally influence where parking occurs, which is indicated in the responses received during the consultation. Respondents generally agreed the charges in the off street car parks should be lower than those for on street parking. Increasing the on street charges will encourage greater use of the off street car parks, where there are far more parking spaces than on street in our town centres, see Appendix D for details of the off street provision in each of the town centres. Off street parking also offers greater flexibility in terms of length of stay and convenience.

- 4.6 When considering the 59.6% of respondents that indicated they did not agree with aligning resident permit charges across the county. It is worth noting that 466 of respondents said they have a current resident permit, this equates to 6% of the total number of resident permits valid in the County. Price increases are never popular but aligning permit charges in Eastbourne and Hastings to those in Lewes which are based on vehicle emissions will mean incentives for owning less polluting vehicles will be available to all resident permit holders. This would also be the first parking charges increase in over ten years. Introducing such an incentive will help to achieve one of the main objectives set out in LTP3 which is to reduce air pollution across the county.
- 4.7 A mixed response was received to the question relating to less polluting vehicles benefitting from reduced permit charges. It was not clear if respondents either agreed or disagreed with this benefit. By offering a reduction in the permit charge based on vehicle CO2 emissions the County Council can help to encourage greater use and ownership of less polluting vehicles in Eastbourne, Hastings and Lewes which in turn will help to reduce pollution in our town centres.
- 4.8 There was little support for the proposed increase to day permits charges which include visitor, hotel, trade and care permits. The purpose of the proposed increase is to encourage greater use of sustainable modes of transport wherever possible, using alternative modes of transport will help to reduce vehicle congestion and pollution in the town centres. The level of the proposed day permits still represent good value for money, for example resident visitor day permits only increase to £1.20 per day in Lewes and Eastbourne. The proposed increase for hotel parking permits will still offer value for money and will be cheaper than the standard on street parking charge. For example, in Eastbourne the proposed cost of this permit would be £2 per day. The terms of use of the hotel permit is not changing and all vehicle will be permitted to park until 11 am the following day. The relatively low cost of this permit will continue to assist in helping to boost the visitor economy to East Sussex.
- 4.9 Although there was a greater level of support for introducing measures to deal with environmental issues and reducing vehicle congestion, the majority of respondents suggested they did not support the proposed increase to on street pay and display charges. Comments received generally related to concerns about the negative economic effect increased parking charges would have on what is perceived to be an already difficult period for the local High Street. Increasing the cost of on-street P&D charges will encourage people to use alternative sustainable forms of transport and encourage people to use off street car parks first, which will minimise the pressure on on-street parking, help reduce congestion and improve air quality in our towns. The increase in charges for on-street parking across Eastbourne, Hastings and Lewes would range from 20p to £1.90 per hour depending on the location. Blue Badge holders are not impacted by this proposal as they do not have to pay for on-street parking.

Resident Permit Holders

Question 13: Do you have any of the following parking permits? (RESIDENT)

Option	Total	Percent
Lewes resident parking permit	116	5.37%

Eastbourne resident parking permit	224	10.37%
Hastings resident parking permit	93	4.30%
Other resident parking permit	33	1.53%
Do not have a resident parking permit	1695	78.44%
Total Responses	2,161	100%

The majority of responses received were from those that do not have a resident permit. 78.44% of those who responded do not have a resident permit.

Of the respondents that indicated they are a resident permit holder, the percentage of responses received from each town were:

5.37% of respondents are Lewes resident permit holders,

10.37% are Eastbourne resident permit holders,

4.30% are Hastings resident permit holders, and

1.53% are other resident permit holders.

In terms of respondents who indicated they were a resident permit holder the figures above represent the following number of resident permit holders in each town, 6% in Lewes (total resident permits 1,909), 11% in Eastbourne (total resident permits 2,026) and 3% in Hastings (total resident permits 2,741)¹.

Business/Other Permits

Question 14: Do you have any of the following types of parking permit? (BUSINESS/OTHER)

Option	Total	Percent
Eastbourne business	35	1.62%
Eastbourne doctor	2	0.09%
Eastbourne healthcare and carer	10	0.46%
Eastbourne hotel	6	0.28%
Eastbourne trade	14	0.65%
Eastbourne visitor	95	4.40%
Falmer visitor	1	0.05%
Hastings business user	2	0.09%
Hastings business annual	3	0.14%
Hastings doctor	1	0.05%
Hastings PCW	3	0.14%
Hastings visitor	27	1.25%
Lewes business	5	0.23%
Lewes healthcare and carer	2	0.09%
Lewes hotel	0	0%
Lewes trade	1	0.05%

¹ Figures taken from 2017/18 Annual Parking Report

Lewes visitor	44	2.04%
Other	91	4.21%
None	1836	84.96%
Not Answered	0	0.00%

The last question that required an answer asked if the respondent used any other specific types of permit.

84.96% of the respondents indicated they did not have any other specific type of permit.

4.40% of respondents have an Eastbourne visitor permit,

4.21% have an **Other** type of permit (not included in the list).

6.43% of respondents hold a business, doctor, hotel, PCW, trade or healthcare and carer permit in Lewes, Eastbourne and Hastings.

5. Consultation Comments

5.1 Respondents were also given the opportunity to record any additional comments on the consultation or alternative suggestions which would help reduce congestion and improve air quality in our town centres. Following analysis, these comments have been broken down and divided into separate themed sub categories. The response comments have been analysed and the top ten themes in order of frequency are listed in the table below.

5.2 The comments generally suggest that improvements to the current public transport offer and road networks need improvement, this includes buses and train services across the county and more dedicated cycle lanes. The top issues submitted as part of the consultation are addressed below in Table 1 and in 'The Councils Response to Key Themes' in section 4 of this report.

Table 1 - Summary of key themes in relation to the Proposal for East Sussex Parking Charges

Rank	Comment Theme	Final Quantity
1	Concerned about the negative effect (mainly economic) on the area	614
2	Need to improve buses and bus services - mainly around cost, reliability, availability	568
3	Alternative parking (regulation and pricing) suggestions	282
4	Need to improve railways and rail services - mainly around cost and reliability	280
5	Need to develop Park & Ride services	249
6	This is just a stealth tax / just a revenue making proposal	178
7	Cycling related comments - more / better cycle lanes and priorities needed	158
8	After investing in the development in Eastbourne (The Beacon), it would be counter productive to increase charges	150

9	General comments about the difficulties presented by roadworks, and the need to improve road links	136
10	It's unfair to compare the three areas as they have different parking requirements and are demographically different	114

5.3 The consultation questionnaire attracted 2,161 responses in total, with 1,704 completing the open text comment box, these comments have been analysed as part of the overall consideration of responses.

5.4 There were also a number of other themes comprised of comments raised by between 15 and 109 people outside of the top ten.

5.5 The most common theme suggests the proposal to increase on street parking charges would have a negative economic effect on the area as a whole with many people believing parking charges are one of the main reasons why visitors are staying away from the high street and generally visiting the area. Many have suggested those that may consider visiting the town centres will change their habits and use out of town shopping centres where parking is free of charge.

5.6 Also prominent within the comments was the suggestion the increase in parking charges is counter-productive following the significant investment made to redevelop The Beacon shopping centre in Eastbourne.

5.7 In response to the questionnaire asking for people's alternative proposals; there were a significant number of comments suggesting there is a need to improve local bus and rail services if there is to be a move from cars to sustainable modes of transport. Comments suggested local residents would be happy to use bus services if they were more frequent, it was also suggested the use of buses and trains is cost prohibitive compared to using a car. The introduction of a Park and Ride scheme was also a popular suggestion as a way to deal with parking demand across the county. Section 4 of this report provides the Council's response to the most common themes.

6. County Council's response to key themes

- 6.1 All of the responses, comments and feedback received as part of the consultation process have been read and considered to help inform the final recommendations that will be put to the Lead Member for Transport and Environment in December 2019.
- 6.2 On completing the on-line questionnaire, respondents were asked to submit any additional commentary relating to the proposals and any alternative suggestions to help reduce congestion and improve air quality in our town centres. The top ten most popular themes from the comments and alternative suggestions received are listed in descending order of frequency, the themes are as follows:

RANK	Comment Theme
1	<p data-bbox="352 701 1299 734">Concerned about the negative effect (mainly economic) on the area</p> <p data-bbox="352 770 1406 936">The comments received as part of the consultation were split between six themes, the most popular comments suggested the proposals would have a negative impact on the High Street and will cause people to shop elsewhere where there is free parking, also popular was the suggestion the price increases would negatively affect tourism in our towns.</p> <p data-bbox="352 972 1406 1037">Further comments suggested the proposals would negatively impact residents and those that work in the town.</p> <p data-bbox="352 1106 1406 1541">Whilst there is often anecdotal evidence there is little published evidence which demonstrates a direct correlation between changes in car park charges and changes in town centre footfall. Other factors will have an influence on people's choice on where they shop or access services and, therefore, the level of footfall in a town centre. These include the amount and availability of paid and free parking; the cost and quality of off-street parking; the accessibility of the town centre by different transport modes (e.g. by train, bus etc); and most fundamentally the quality of the retail, leisure and services on offer. If it was the case that higher parking charges result in less footfall, then we would expect a number of our smaller towns in the county, where there are no on or off-street parking charges, to be seeing significant increases in footfall more so than the likes of Eastbourne, Hastings and Lewes. These towns also, of course, provide shoppers and visitors with an excellent retail, leisure and wider services offer.</p> <p data-bbox="352 1576 1406 1742">The management of parking, including through appropriate charging, is an important part of the demand management toolkit in our LTP3 which complements the investment the Council is making to improve travel choices which encourage the use of walking, cycling and public transport in East Sussex, with the overall aim of supporting sustainable economic growth.</p> <p data-bbox="352 1778 1406 1910">Charging at a sufficient level to impact driver behaviour, can bolster the local economy by encouraging a 'churn' of visitors and shoppers, rather than spaces being occupied by a single user for a long period of time. It should also encourage drivers to:</p> <ul data-bbox="501 1912 1350 2018" style="list-style-type: none"> <li data-bbox="501 1912 1350 1977">• consider how they travel and whether it is alternative mode of travel – walk, cycle, bus or train <li data-bbox="501 1980 890 2018">• park in off street car parks <p data-bbox="352 2033 1406 2063">The proposed increase for hotel parking permits will still offer value for money</p>

and will be cheaper than the standard on street parking charge. For example, in Eastbourne the proposed cost of this permit would be £2 per day. The terms of use of the hotel permit is not changing and all vehicle will be permitted to park until 11 am the following day. The relatively low cost of this permit will continue to assist in helping to boost the visitor economy to East Sussex.

We have reviewed the number of on street parking spaces that would be affected by the proposals compared to the number of off street parking spaces in the town centres. In Eastbourne, of the 2,008 on street parking spaces which provide pay and display parking 425 parking spaces in the town centre (Zone A and Zone G), those near the main retail area, will be most affected by the proposals. As an alternative to parking on street there are 1,718 off street parking places in the Railway Station, Beacon, Junction Road and Hyde Gardens car parks that will offer cheaper and longer stay parking. The proposals seek to encourage visitors to utilise the off street parking places which will help to reduce vehicle movements in the town centre and in turn reduce air pollution.

In Lewes, of the 1,084 on street parking spaces that provide pay & display parking; of these 149 parking spaces in the town centre, close to the local amenities will see the highest increase in the parking charges. As an alternative there are 706 parking spaces in 12 off street car parks within walking distance of the town centre which will offer cheaper and longer stay parking.

In Hastings 463 pay and display parking spaces across the town centre will be affected by the proposed increases, as an alternative there are 2,749 off street parking spaces in 16 car parks across the town centre which will offer cheaper and longer stay parking options. There are also 31 pay and display coach parking spaces in the town centre. There are a further 127 off street parking spaces in St. Leonards.

The above analysis demonstrates that the majority of car parking capacity in Eastbourne, Lewes and Hastings is in off street car parks. So, the proposed increases to Pay and Display charges should not have a detrimental impact economic viability of these towns. In fact, by offering a discount based on the vehicle emissions resident parking permits can help to encourage greater use of less polluting vehicles which will help to reduce harmful emissions, and improve air quality in our town centres and across the county and support the Government's priority to achieve net zero emissions by 2050. The proposals for the on street parking charges will encourage greater use of off street car parks, reduce the number of vehicles driving on our town centre roads searching for parking spaces and will encourage greater use of alternative modes of transport which in turn will reduce harmful emissions and improve air quality. These outcomes will make these towns a more appealing place to work, live and visit and thereby boost the local economy.

2	<p>Need to improve buses and bus services - mainly around cost, reliability, availability</p> <p>Responders to the consultation have suggested that an alternative proposal could be to improve buses and bus services, mainly in terms of cost, reliability and availability.</p> <p>The Council agrees that improvements in this area would have benefits and the County Council's LTP3 sets out its strategy for encouraging greater use of more sustainable and healthier modes of transport. Bus services in East Sussex are predominantly provided by bus companies on a commercial basis, without funding from the County Council. The commercially run services in East Sussex are mainly concentrated along the coastal strip and on the inter-urban routes between Brighton and Tunbridge Wells, Brighton and Eastbourne, Eastbourne and Uckfield, and Eastbourne and Tunbridge Wells. Where bus routes require additional services bus companies can increase the frequency by adding additional buses to the route, a prime example of this is the Brighton and Hove Bus Service 12 between Brighton and Eastbourne where additional buses were recently added to increase frequency due to growing demand.</p> <p>However, the needs of the rural areas and small market towns are less well served which means services in these areas often need to be subsidised. The Public Transport Strategic Commissioning Strategy sets out how the County Council will use the funding available for subsidised services to secure the best outcomes for East Sussex residents, through its understanding of need, matching supply with need, and thereby make the most effective use of all available resources. The Strategy has effected a change in the overall nature and configuration of subsidised bus services and is a statement of commitment about the way in which the County Council purchases services in the future to ensure best value for council tax payers.</p> <p>The number one contributor to the late running of bus services is traffic congestion in and around town centres. By encouraging the use of more sustainable modes of transport, coupled with improvements at junctions to enable improved movement of buses, we aim to reduce the congestion and improve the reliability of the bus services across the county. Reducing congestion will also help to improve air quality and the health of our residents and visitors.</p> <p>Bus services can only operate within the confines of the existing road network, road works can also be a significant contributing factor to the reliability and frequency of services, wherever possible the Council will try to minimise disruption to services but in some instances delays are inevitable to achieve the longer term aim of improving our road networks.</p> <p>The council also looks to identify locations where increased congestion is likely and where necessary explore measures that could minimise the impact to bus services and congestion. By improving junction, constructing bus lanes and improving bus stops and footways. We are looking to improve the reliability of the service making it more attractive as an alternative transport choice whilst minimising increases in congestion.</p> <p>Where greater use of bus services occur or increased demand is identified, our transport partners may consider increasing the frequency of services.</p>
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	<p>The Government has recently announced an overhaul of bus services backed by an investment of £220m that will be rolled out across England. The plan will fund new 'superbus' networks and expand the fleet of low-emission buses to give local authorities that wish to pursue "London-style bus system in their area" the support needed.</p> <p>With the ongoing pressure on Council budgets, any future Parking Surplus, excluding existing commitments, could be used as a further contribution towards the County Council's public transport costs. The investment in these activities is complimentary to the objectives of our LTP3 in the provision of sustainable transport which assists in reducing congestion and improving air quality in the County. However, improvements to buses and bus services alone will not achieve the change in behaviour that the proposals to parking tariffs is seeking to achieve.</p>
<p>3</p>	<p>Alternative parking (regulation and pricing) suggestions</p> <p>The County Council may consider amendments to the hours of operation of the existing permit holder parking to ensure those spaces are protected later into the evening. This will ensure a greater availability of on street parking, primarily for permit holders but will also encourage greater use of the off street car parks.</p> <p>The proposed changes to parking charges have taken into consideration the need to encourage use of less polluting vehicles and the amended permit charges structure would mean those with the lowest polluting vehicle could pay less than they currently do</p>
<p>4</p>	<p>Need to improve railways and rail services - mainly around cost and reliability</p> <p>Responders to the consultation have suggested that an alternative proposal could be to improve railways and rail services, highlighting the high cost of travel and unreliability of the network.</p> <p>The County Council does not have a statutory responsibility in relation to rail, and therefore cannot set rail fares or increase the frequency of rail services. Each of our main towns have regular train services providing inter-settlement connections as well as to London or along the coastal corridor to Brighton and Ashford meaning visitors can access the local amenities without using a car.</p> <p>The Council acknowledges the rail network and standard of train services in the county are restricted by shortcomings in the infrastructure which affects east/west movements along the coastal corridor, connections to Brighton, Ashford and Gatwick Airport, and also between Hastings and London. We will continue to lobby and work with the rail industry to seek infrastructure improvements to the railways which improve travelling times, increased and better quality rail services and more accessible rail stations – both on the journey to and from the station as well as at the station itself – to provide as best a service as possible to ensure our town centres are accessible and continue to be a desired destination for our many visitors.</p> <p>However, improvements to railways and rail services alone will not enable the change in behaviour that the proposals to parking tariffs is seeking to achieve, and needs to be considered as part of a wider strategy for delivering improved travel choices that encourages less travel by car.</p>

5

Need to develop Park & Ride services

Responders to the consultation have suggested that an alternative proposal could be to develop Park & Ride schemes in the County.

Park and Ride generally works best where there is a 360 degree catchment area, albeit there are exceptions; limited town centre parking; and where car parking pricing discourages accessing town centres by car. As such any provision for Park and Ride would be dependent on:

- The capacity and use of parking in the town centre;
- The cost of parking in the town centre;
- Site location for parking sites – they need to be located on the outskirts and directly off main routes into the town so that they can intercept car journeys easily. This is alongside the need for sites which are of a sufficient size to make it financially viable (need at least 400 – 500 spaces);
- Whether a Park and Ride would be self-sufficient in terms of bus operating costs – from a County Council perspective, there would be no available subsidisation – and whether an operator would be willing to run the services;
- An assessment on the capacity of the road network and whether better journey times for buses can be provided over car traffic through the provision of bus priority measures (bus lanes, priority at traffic signals) on key corridors. These schemes can also increase traffic congestion within the wider area of a Park and Ride site caused by vehicles accessing the site, so any assessment would also need to factor this in, because additional traffic management measures may be required.
- Ability to change travel behaviour; providing a service which supports the journey purposes, is of a high quality, is comfortable and accessible for all users and is economically priced, are essential factors.

In relation to the potential for park and ride in East Sussex:

- there is a good supply of parking both off street and on street in our main town centres;
- the pricing structure for on and off road parking in our main towns is trying to balance the turnover of parking spaces with encouraging access into the town centre and supporting the local economy, therefore is unlikely to deter people from driving into the town centre;
- there are currently limited site locations on the outskirts and on the main routes into our main town that could be used to provide park & ride;

Any proposals for a Park & Ride scheme would need to be fully costed and there would need to be convincing evidence that any investment by the Council would be paid back through the scheme and that the scheme would continue to cover its operational costs moving forward.

Therefore, there are no plans to explore Park & Ride services in the county as they are not thought to be viable.

<p>6</p>	<p>This is just a stealth tax or a revenue making proposal</p> <p>The changes to parking charges have been proposed to influence driver behaviour and encourage people to use alternative sustainable forms of transport or to use off-street car parks if they continue to drive, which will help reduce congestion and improve air quality in our towns. The proposed changes to resident permits, with owners of low emission vehicles paying less than those with higher emissions, will give an incentive to encourage greater use and ownership of less polluting vehicles in Eastbourne, Hastings and Lewes which in turn will help to reduce pollution in our town centres.</p> <p>A significant proportion of carbon dioxide is generated by transport compared to other contributors which has an effect on human and environmental health. A specific objective of LTP3 is to reduce congestion by improving the efficiency of the transport network and encouraging greater use of sustainable modes of transport. Taking measures to reduce congestion will contribute to improving the health of our residents and visitors and improving the local environment whilst also encouraging use of healthier transport options.</p> <p>East Sussex County Council, Lewes and Eastbourne Councils have recognised and declared a climate emergency. With the County Council setting a target of carbon neutrality from its activities by 2050, in line with the new target for the UK agreed by Parliament in 2019. In order to combat air pollution and to improve the health of our residents across the county, the proposed changes to parking charges can help to encourage cleaner and healthier travel options and a move to less polluting vehicles.</p> <p>Any surplus income generated, after operating costs, can only be used on transport and highway initiatives which are qualifying expenditure as governed by Section 55 of the Road Traffic Regulation Act 1984, as amended from October 2004 by Section 95 of the Traffic Management Act 2004. With the ongoing pressure on Council budgets, any future Parking Surplus, excluding existing commitments, could be used as a contribution towards the County Council's public transport costs. The investment in these activities is complimentary to the objectives of our LTP3 in the provision of sustainable transport which assists in reducing congestion and improving air quality in the County.</p>
<p>7</p>	<p>Cycling related comments - more / better cycle lanes and priorities needed</p> <p>Responders to the consultation have suggested that an alternative proposal could be to provide more and better cycle lanes.</p> <p>A significant part of the LTP3 Strategy and future direction for East Sussex is to implement infrastructure to support integrated sustainable travel – walking, cycling, public transport, car sharing etc. For example – bus priority measures, cycle lanes and facilities, improvements to pedestrian routes to key trip attractors, better rail / bus /cycle interchanges, less street clutter and enhanced public spaces.</p> <p>Work since 2011 has been carried out to implement improved cycle routes across the county and our transport partners have invested in better and more secure cycle storage at local transport interchanges.</p> <p>By providing dedicated cycle lanes, better and more secure cycle storage, residents can be encouraged to cycle part of their journey and continue on buses or trains which will help to reduce vehicle trips and also reduce air</p>

	<p>pollution across the county.</p> <p>Through the South East Local Enterprise Partnership's Local Growth Deal, we have secured £9m of Local Growth Fund monies in Bexhill and Hastings towards improving movement and access in the two towns, with a significant proportion being used to fund walking and cycling infrastructure. £6m has also been secured for walking and cycling infrastructure in Eastbourne and South Wealden with a further £6m being spend on improving movement and access in Eastbourne town centre. This investment in infrastructure has and will continue to be delivered up until March 2021.</p> <p>The County Council is currently developing its county wide Local Cycling & Walking Infrastructure Plan in response to the Department for Transport's national Cycling & Walking Investment Plan, on which it will be consulting later this autumn. We will use this to lobby for future investment in cycling and walking infrastructure and initiatives through bidding for external funding as well as, where possible, using either the council's own funding towards local transport improvements or development contributions. However, these improvements alone will not deliver the benefits that the proposals are seeking to achieve.</p>
8	<p>After investing in the development in Eastbourne (The Beacon), it would be counterproductive to increase charges</p> <p>The availability and frequency of public transport close to The Beacon and with the investment currently being made in improving movement and access into Eastbourne Town Centre either through the Eastbourne/South Wealden Walking and Cycling Package or the Town Centre Movement and Access Package, means there are alternative options to parking on street. Where visitors are unable to use the local bus services or trains, or are not able to walk or cycle to the town centre, we would always recommend using the off street car parks close to The Beacon.</p> <p>On street parking spaces are provided for convenience to allow visitors to quickly access the local amenities and we would not expect longer stay and all day parking to occur on street, especially in Eastbourne town centre.</p> <p>There is considerable parking provision for The Beacon and main shopping area provided in two car parks which have a combined total of 1,300 parking spaces.</p> <p>The proposed increase in parking charges have been designed to encourage the use of the off street parking facilities and to help encourage greater use of sustainable modes of transport such as buses, cycling and walking. This has been supported by the significant investment we have been making to improve these travel choices, and we will continue to seek further external funding towards deliver the enabling infrastructure and initiatives to encourage the use of alternatives to the car.</p>
9	<p>General comments about the difficulties presented by roadworks, and the need to improve road links</p> <p>The County Council tries, wherever possible, to minimise disruption caused by road works and to keep traffic flowing whilst completing the highway works whether this be East Sussex County Council or the various utilities. Road works are necessary to help maintain the condition of the road to enable it to be used safely and for utilities to maintain vital services.</p>

	<p>By encouraging more sustainable modes of transport we can reduce the number of vehicles on our roads which in turn will reduce congestion, especially in areas affected by ongoing road works.</p> <p>As part of the LTP3 Strategy, we recognise that there is a need to improve capacity of key junctions on our road network. These improvements will be targeted and will need to support housing and employment growth as well as the overall effectiveness and efficiency of the road network. A number of the improvements to road links in the county are set out below.</p> <p>A number of the economically important local authority managed A class roads have been identified as part of the Major Road Network (MRN). The MRN sits between the Strategic Road Network, which is managed by Highways England, and the rest of the local road network, which is managed by the County Council as the local highway authority.</p> <p>At present the County Council is currently developing proposals for a package of junction improvements on the A22 around Hailsham and Stone Cross to support the housing and employment growth in the area with a view to securing Major Road Network funding from Government towards their delivery. Likewise, we will be undertaking a study on the A259 between Eastbourne and Brighton to identify the potential interventions required to improve the efficiency and effectiveness of the road which may include capacity improvements at key junctions. Similar package of schemes for the MRN will be developed over the coming years to enable external funding to be secured.</p> <p>We also have proposed improvements to the A2270 corridor which will in part improve junction capacity at the A2270/Wannock Rd/Polegate High Street junction as well as improvements on the corridor for public transport users and cyclists. These will be delivered using Local Growth Fund monies in 2020/21.</p> <p>From a strategic road network perspective, Highways England are bringing forward a package of smaller scale interventions for the A27 corridor between Lewes and Polegate with particular focus on improvements around Polegate. These will be delivered on March 2020 onwards.</p>
10	<p>It's unfair to compare the three areas as they have different parking requirements and are demographically different</p> <p>There are always unique challenges within town centres to provide parking provision for all users whether they are residents, visitors or other service users. Ultimately the Council needs to balance the parking provision for residents who live in the town centres and need to park their vehicles on street due to a lack of driveway, garage or private parking with also ensuring there is short term parking provision for those wishing to make a quick visit to the local amenities. Under the proposals, the parking schemes in Eastbourne, Lewes and Hastings will still meet these local needs.</p> <p>The proposals will also ensure resident permit holders in Eastbourne and Hastings will be able to benefit from the same discounted rates that are available in Lewes should they have a less polluting vehicle. The proposals will help to encourage the take up of less polluting vehicles which in turn will help the environment and reduce air pollution across the county.</p>

7. Further Analysis – Consultation Comments

7.1 From the 1,704 comments submitted via the open text box at the end of the questionnaire, we have identified 1,373 respondents who provided details of their location as part of their response. This information has been used to identify location specific comments.

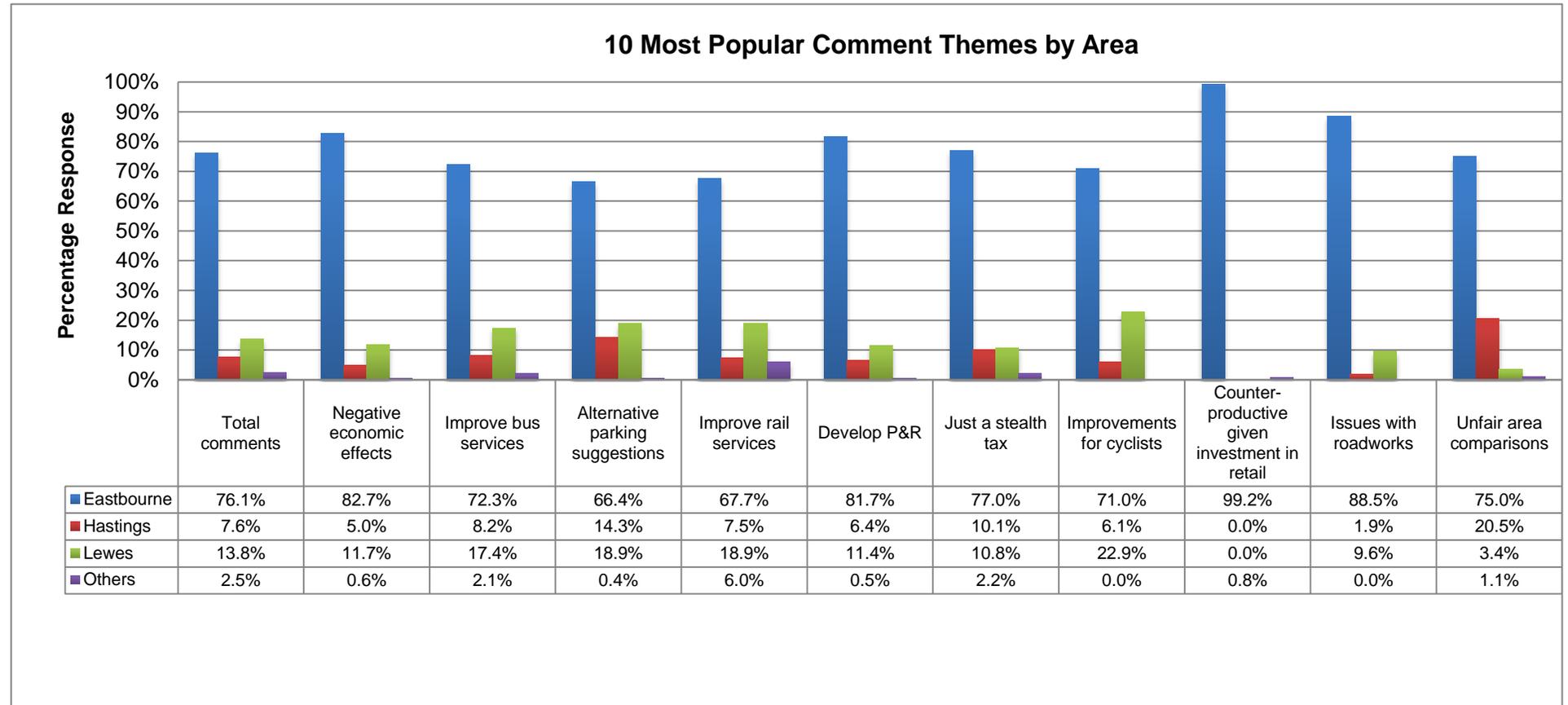
7.2 Our analysis shows the majority of responses were received from Eastbourne (76.1%). To put these comments into context, the table below indicates the number of comments relating to each town/district and the number of individual comments related to the specific topic. In most instances the respondent provided a range of comments and these have been analysed separately to produce the overall top 10 areas of concern.

By Area	Eastbourne	Hastings	Lewes District	Others	All areas
Negative economic effects	397	24	56	3	480
Improve bus services	316	36	76	9	437
Alternative parking suggestions	158	34	45	1	238
Improve rail services	136	15	38	12	201
Develop P&R	165	13	23	1	202
Just a stealth tax	107	14	15	3	139
Improvements for cyclists	93	8	30	0	131
Counter-productive given investment in retail	129	0	0	1	130
Issues with roadworks	92	2	10	0	104
Unfair area comparisons	66	18	3	1	88

7.3 Of the 1,373 respondents who were identified as area specific, 1,045 of those individual comments relate to Eastbourne (76.1%), 189 comments relate to Lewes (13.8%), 104 (7.6%) comments relate to Hastings and 35 (2.5%) comments were submitted by respondents who do not live in any of the towns.

Chart 1 below shows how the top ten comment topics are broken down by area.

Chart 1 – 10 Most Popular Comment Themes by Area



Additional Consultation Comments

Emails

7.4 40 emails which included 11 attached letters, were received during the consultation period. 21 relate to comments about Eastbourne, 16 relate to comments about Lewes, one relates to East Sussex and a further email relating to general comments.

- 36 of the emails indicated their objection to the proposals
- 1 email was classed as a neutral comment
- 1 email related to existing visitor parking permits
- 1 email related to various reasons for air pollution/emissions levels
- 1 email enquired as to whether National Parks Powers had been taken into consideration as part of the proposals, the Council's response to this is as follows:

The National Park purposes are set out in the Environment Act 1995 and all public bodies, when undertaking any activity which may have an impact on the National Park, have a duty to have regard to these purposes and a corresponding duty. Whilst the Council needs to have regard to these purposes, it is not a legal requirement to comply with them on every decision that we may take that may impact upon the National Park area.

Purpose 1: *To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.*

Purpose 2: *To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.*

Duty: *To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.*

Eastbourne Parking Review

7.5 There were also 32 responses received via the Eastbourne parking review consultation that ran at the same time as the Proposal for East Sussex Parking Charges, six respondents replied to both consultations. Where duplicates have been identified those responses to the Eastbourne parking review have not been considered as part of this consultation.

The comments were made up of the following subjects:

- 1 response indicates support for increasing the charges
- 15 responses suggest the charges will deter visitors from Eastbourne
- 6 responses suggest a negative economic impact on the town centre
- 2 responses are against the proposed increase in permit charges
- 1 response suggested the proposed increases are just a money making exercise
- 1 response suggested the proposed changes were unfair on low income families

7.6 In general the emailed comments reflect the greater comments received as part of this consultation. The majority of the comments suggested the increased parking charges would deter visitors to Eastbourne or would have a negative economic impact on the town centre.

Lewes Parking Review

7.7 A Lewes parking review was also running at the same time as the Proposal for East Sussex Parking Charges, three comments relating to these proposals were submitted and have been included within the comments of this consultation.

The comments were made up of the following subjects:

- 1 response suggested a negative economic impact on Lewes town centre
- 1 response suggested this was a money making exercise and more radical thinking was required to deal with the parking issues
- 1 response suggested it was not possible for everyone to cycle or benefit from sustainable modes of transport and the increase would deter visitors from Lewes

7.8 In general the emailed comments reflect the greater comments received as part of this consultation. The majority of the comments suggested the increased parking charges would deter visitors to Lewes or would have a negative economic impact on the town centre.

Hastings Parking Review

7.9 There was one response received via the Hastings parking review consultation that ran at the same time as the Proposal for East Sussex Parking Charges. This comment has been included as part of this consultation.

8 Consultation Submissions from Key Stakeholders

As part of the consultation, key and statutory stakeholders were informed of the proposals via an email with an attached letter explaining the proposals and inviting comments. A full list of stakeholders can be found in Appendix 1 of this report. Submissions have been received from Polegate Town Council, Heathfield and Waldron Parish Council, the Eastbourne Hospitality Association, an Eastbourne Councillor and a Lewes District Councillor.

There were also two petitions received against the proposed changes to parking charges, totalling 4,838 signatures, one petition was submitted by a parish councillor for Lewes and one petition was submitted by a local MP and Councillor in Eastbourne. Neither of the petitions provided a response to the questions in the consultation.

All of the comments, feedback and suggestions received during the consultation have been analysed and have helped to inform the final proposals for presentation to East Sussex County Council's Lead Member for Transport and Environment on 16 December 2019.

The details of these submissions together with all correspondence and consultation questionnaires are available to be viewed in the members room.

Local Authorities

Polegate Town Council

The Town Council has discussed the proposed changes and makes the following comments:

- 8.1 It disagrees that the increased parking charges will change driver behaviour re on street review dates 17th June 2019 point 3.11.

It was noted that the parking tariffs will be reviewed each year, by reviewed this was read to mean that it will be increased.
Regarding the surplus income Item 4, Council believe it would be a good idea if All surplus income was contributed to improving transport, so that people could feel more confident and inclined to utilise local buses. The council hoped that surplus money paid by drivers is not taken away to ease budget deficits in other areas.
- 8.2 Council questioned that on 9th Feb 2016, Council (ESCC) agreed to continue drivers' payments totally £630,000 towards supporting the bus network and concessionary fares and wondered if this had happened? Also was any money contributed in 2017?
- 8.3 The council commented that it is very helpful to have live bus information at bus stops. In Edinburg, passengers have either correct change or use a contactless card to pay for fares on entry. This reduces delay by the drivers having to give change. In addition, one can buy weekly passes etc. buses also drop off and pick up passengers at the allocated stop, so if there is already a bus there, the second bus will wait until the first has left. This is a safer practice for elderly and disabled.
- 8.4 Council felt that if the public could see meaningful improvements in public services, they would feel more confident in relying on the bus and not the car. The proposed increase of just under 100% is very high, especially if more is to follow.
- 8.5 Council also suggest that all health workers, whether it be carers, nurses or doctors who visit people in their homes or take them to see a GP should not be taken advantage of by being immorally charged. They should be able to park and not pay. Parking should have similar rules as per blue badge holders when visiting or escorting the ill and those in need.

- 8.6 Council also suggest that there be a “shoppers” permit which could be bought annually for say £50 for 2 hours per stay. This works in other areas of the country. If ESCC do get the revenue, then perhaps if it is not ploughed back into transport, then it should be put into the fund to improve the potholes and road repairs.
- 8.7 Council also commented that the new bus stops in Eastbourne should be moved closer to the town centre, as those who are elderly and have heavy bags have commented that they don't visit town as it is too far to walk to the bus stops and the train station.
- 8.8 Council also had another suggestion where like London and larger towns, a pass be introduced for bus AND train travels so that people could travel by either. This used to be run in Eastbourne.

The Councils response to Polegate Town Council

From the consultation 65.43% of respondents either strongly agreed or agreed that the cost of existing parking charges do influence where people park. We believe that the proposed price increase will help to encourage greater use of alternative modes of transport and/or encourage greater use of off-street carparks which will help reduce congestion in our town centres.

Parking schemes are regularly reviewed, this does not necessarily mean increase to parking charges, parking charges have not increased in Eastbourne since 2008. Parking reviews also consider if the current zones meet the requirements of our residents and businesses and the reviews offer the chance for improvements to be made if required. However, parking charges should be reviewed regularly to ensure they are set at a level that is having the required impact.

Any surplus income generated, after operating costs, can be used on transport and highway initiatives which are qualifying expenditure as governed by Section 55 of the Road Traffic Regulation Act 1984, as amended from October 2004 by Section 95 of the Traffic Management Act 2004. Any future Parking Surplus, excluding existing commitments, could be used as a further contribution towards the County Council's public transport costs. The investment in these activities is complimentary to the objectives of our LTP3 in the provision of sustainable transport which assists in reducing congestion and improving air quality in the County.

We confirm that on 9 February 2016 full Council agreed that should the Parking Surplus be available it would contribute £630,000 towards the supported bus network and concessionary fares and that this was a permanent budget change. .

Real time bus information systems continue to be introduced across the county and the local bus companies will introduce the latest technologies to help speed up boarding buses across the county, both Stagecoach and Brighton and Hove Buses offer various weekly, monthly and yearly tickets via a card or mobile app.

East Sussex County Council continues to work with our public transport partners and will continue to lobby central government for more funding for our public transport network, we are keen for as many viable services as possible to run across the county, providing better access to our town centres for all our residents.

Current and proposed permit charges will remain low for health care workers, carers and doctors across the county. Where a blue badge holder requires assistance or needs to travel by car, as long as the vehicle is used for this purpose, a blue badge can be used to park in dedicated parking places or on yellow lines close to the premises.

We are not able to introduce a shoppers permit as this would mean additional resource is required to administer and enforce the scheme which would not make it cost effective. The proposed parking charges increase is intended to encourage the use of off street car parks in the town centre where parking is cheaper and longer stays are permitted.

Bus stops are located as close to the local amenities as is possible and where, especially in town centres they can accommodate large numbers of people.

Any ticket providing travel on both buses and trains would currently be issued by the operators of those services such as PlusBus which is offered by Southern Rail. There is however work being undertaken at a regional level which will further consider the role of smart and integrated ticketing to better facilitate end to end travel across both buses and trains.

Heathfield and Waldron Parish Council

8.9 The Parish Council considered your proposals for changes to East Sussex Parking Charges and the accompanying consultation response document. Whilst the charges are not being made in Heathfield, our residents will be paying them when they visit the larger towns.

8.10 The Parish Council felt that the questions in the response document were loaded a particular way and have therefore asked me to write to you with their comments. They feel that people should not be charged for the first hour of on street parking, that the amount of the increase in the charges is excessive and the increased charges will have an impact on local business.

8.11 The Parish Council request that their response be included and be considered in with the other responses.

The Councils response to Heathfield and Waldron Parish Council

Parking charges have not been subject to an increase in Eastbourne since 2008, in Lewes since 2007 and in Hastings since 2008. These proposals only relate to the on street parking charges, off street car park charges are not affected by these proposals and will offer better value for money and greater flexibility than parking on street.

We believe that the consultation has been undertaken in a fair and transparent manner. The consultation looked to understand people's views on environmental impacts and the direct proposals for changes to on street parking charges. Making the first hour of parking free would reduce the efficiency of the parking enforcement as well having a financial impact on the parking scheme, which needs to be self-financing.

Local Councillors

8.12 An Eastbourne Councillor indicated their objection to the proposed increase to residents permits, who felt the proposals were far too high especially for those who may have two cars.

The Councils response

Parking charges have not been subject to an increase in Eastbourne since 2008 and by aligning with the current charges in Lewes we are able to provide incentives for less polluting vehicles which will help to improve the air quality and reduce harmful emissions in the town centre.

- 8.13 A Lewes Councillor indicated their objection to the proposed increase in on-street parking charges for Lewes on the grounds that it will deter visitors to local businesses, depriving the town's economy of income and discriminate against people in rural areas who often have no choice but to use their car. While it is always good to use public transport or cycle whenever possible, sometimes there is no alternative. It was also felt that Lewes already has a reputation for putting off visitors due to its parking regime.

The Councils response

Whilst there is often anecdotal evidence there is little published evidence which demonstrates a direct correlation between changes in car park charges and changes in town centre footfall. Other factors will have an influence on people's choice on where they shop or access services and, therefore, the level of footfall in a town centre. These include the amount and availability of paid and free parking; the cost and quality of off-street parking; the accessibility of the town centre by different transport modes (e.g. by train, bus etc); and most fundamentally the quality of the retail, leisure and services on offer. If it was the case that higher parking charges result in less footfall, then we would expect a number of our smaller towns in the county, where there are no on or off-street parking charges, to be seeing significant increases in footfall more so than the likes of Eastbourne, Hastings and Lewes. Lewes, of course, provides shoppers and visitors with an excellent retail, leisure and wider services offer.

The management of parking, including through appropriate charging, is an important part of the demand management toolkit in our Local Transport Plan which complements the investment we are equally making to improve travel choices which encourage the use of walking, cycling and public transport in East Sussex, with the overall aim of supporting sustainable economic growth.

Charging at a sufficient level to impact driver behaviour, can bolster the local economy by encouraging a 'churn' of visitors and shoppers, rather than spaces being occupied by a single user for a long period of time. It should also encourage drivers to:

- consider how they travel and whether it is alternative mode of travel – walk, cycle, bus or train
- park in off street car parks

Of the 1,084 parking spaces in Lewes that provide pay and display parking there are 149 pay and display parking spaces in Lewes town centre that would be subject to the proposed increase, to mitigate against this there are 706 off street parking spaces in car parks within walking distance of the town centre where parking charges will be significantly lower than those for on street parking.

The off street parking provision also offers greater flexibility than the on street parking. By encouraging use of the off street car parks there will be less congestion on the town centre roads which will help to improve bus service punctuality.

The Eastbourne Hospitality Association

- 8.14 The Association indicated they generally support the argument to protect the environment and the health of our residents and visitors. The association feels our public transport links are not good enough for visitors to use them rather than the car.
- 8.15 The Association's main point of concern is the proposed increase in hotel permits from £1 to £2.
- 8.16 In the present climate the proposed 100% increase for the "H" permits to the hoteliers is a further blow to what is a very difficult time in tourism. The prices in Eastbourne are at an all-

time low, with none of us being able to increase our prices for several years. The charge at present is generally absorbed by the accommodation providers, and if you start to ask guests to pay for them they will not return. This is a situation that we could all do without, we need to encourage people to return and to keep returning. Under the proposed increase to £2 this cost will be another blow to the industry, which is the main economy for Eastbourne.

8.17 A suggestion was put forward to allow the hotelier to print the permit themselves which would save the cost of producing the scratch cards. It is felt this would also alleviate the necessity for members to have to apply online and then visit the library to collect the permits.

8.18 Further comments from the Eastbourne Hospitality Association included:

At a time when our town is under a state of major road changes, with the works seeming to be going on for ever, and the current climate of the retail industry. The proposal to increase parking meter charges at this time does not seem the best time to introduce this increase.

We ask that you consider the impact that these proposed increases will have on our businesses at this time and ask that you defer the price increase until:

- 1) We are in more certain times economically.
- 2) The works in the town are completed.
- 3) There is major improvement to the public transport structure.
- 4) Making provision for a park and ride scheme to the town.

The Councils response to Eastbourne Hospitality Association

The proposals will see the first increase in parking charges in Eastbourne since 2008. The proposed increase of £1 per day for hotel parking permits will still offer value for money and will be cheaper than the standard on street parking charge. The terms of use of the hotel permit is not changing and all vehicle will be permitted to park until 11 am the following day.

The proposed price increase is also intended to encourage alternative modes of transport which will help to reduce the number of vehicles coming into Eastbourne, this will also help to reduce emissions levels and improve air quality in the long term.

The proposed increase in parking charges only relates to the on street parking provision, with over 1,300 of the 2,631 off street parking spaces available in the town centre it will be cheaper and more convenient for most visitors to utilise the off street parking provision.

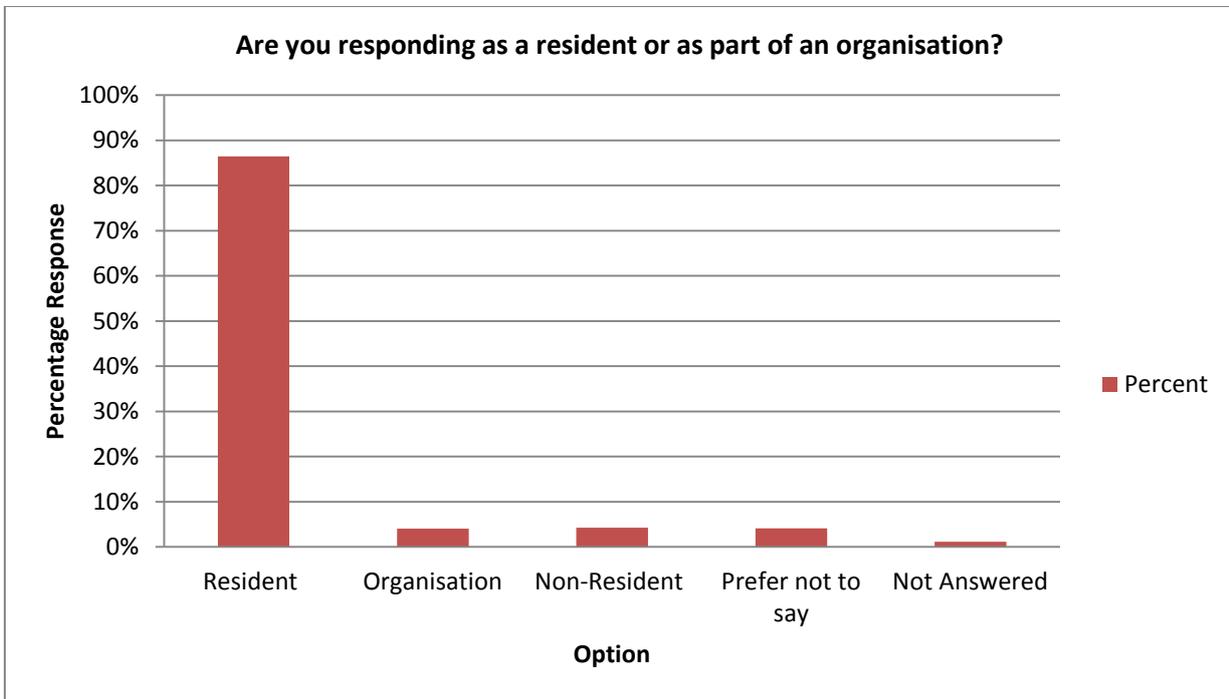
The management of parking, including through appropriate charging, is an important part of the demand management toolkit in our Local Transport Plan which complements the investment we are equally making to improve travel choices which encourage the use of walking, cycling and public transport in the town, with the overall aim of supporting sustainable economic growth. Within Eastbourne, this currently includes the £8.25m currently being invested in the improvements for pedestrians and public transport users in Terminus Road, Cornfield Road and Gildredge Road, with a further £3m planned to be spent on the second phase of improvements in Terminus Road from Bankers Corner to Langney Road; as well as the Local Growth Fund investment we are making in cycling infrastructure across the town and the first phase of the public transport corridor to improve connectivity between Hailsham, Polegate and Eastbourne.

9. About You

These questions provide demographic and other personal information to assist in analysis and interpretation of the results, and in particular to inform the Equalities Impact Assessment.

Q16. Are you responding as a resident or as part of an organisation?

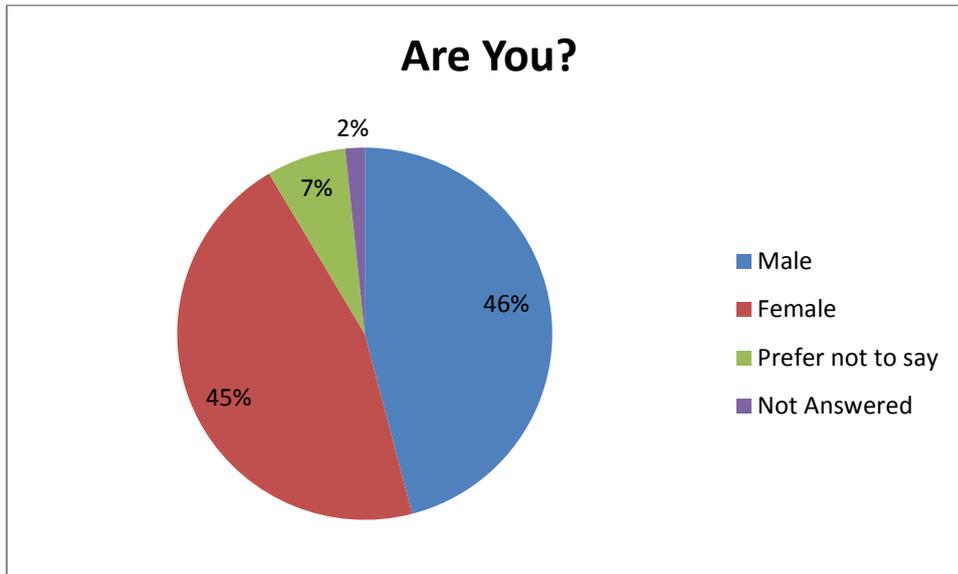
Option	Total	Percent
Resident	1868	86.48%
Organisation	87	4.03%
Non-Resident	92	4.26%
Prefer not to say	88	4.07%
Not Answered	25	1.16%
Total	2,160	100%



The majority of those responding indicated they are residents which accounted for 86.48% of responses, those responding as organisations accounted for 4.03% of responses, those indicating they were non-resident accounted for 4.26% of responses, 4.07% of responses preferred not to say and 1.16% did not answer this question.

Q17. Which gender are you?

Option	Total	Percent
Male	992	45.93%
Female	984	45.56%
Prefer not to say	148	6.85%
Not Answered	36	1.67%
Total	2,160	100%



The response appears to be evenly split between men and women. Of those that gave their gender, there appeared to be a similar number of women (45%) as men (46%) who responded to this question, 7% chose not to say and 2% chose not to answer the question, so the gender split of respondents shown may not be entirely reflective of the reality.

Q18. Do you identify as a transgender person?

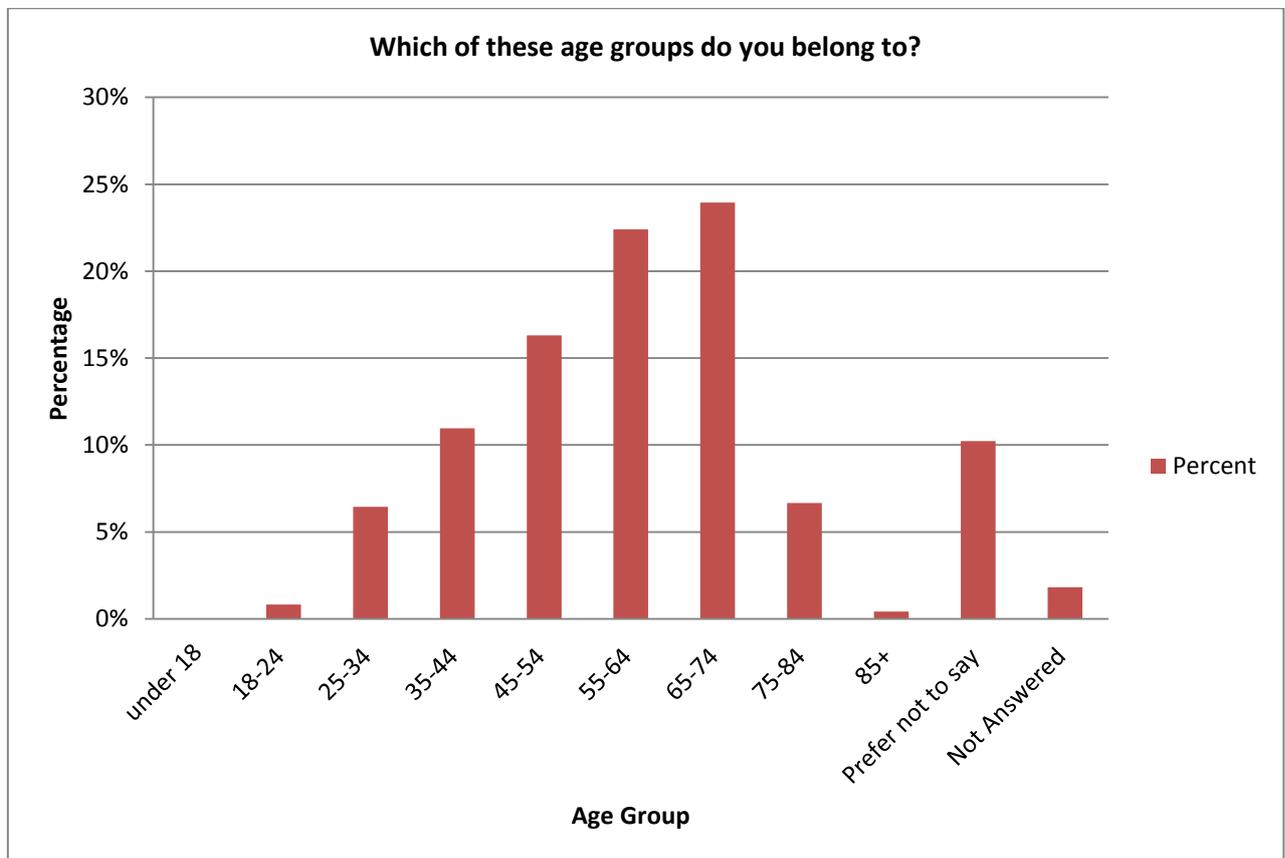
Option	Total	Percent
Yes	5	0.23%
No	1803	83.47%
Prefer not to say	283	13.10%
Not Answered	69	3.19%
Total	2,160	100%



Overall, 83.47% of the respondents indicated they did identify as a transgender person. Less than 1% of respondents indicated they do identify as a transgender person (0.23%). 13.1% of respondents indicated they preferred not to say and 3.19% of respondents did not answer this question.

Q.19. Which of these age groups do you belong to?

Option	Total	Percent
under 18	0	0%
18-24	18	0.83%
25-34	139	6.44%
35-44	237	10.97%
45-54	352	16.30%
55-64	484	22.41%
65-74	517	23.94%
75-84	144	6.67%
85+	9	0.42%
Prefer not to say	221	10.23%
Not Answered	39	1.81%
Total	2,160	100%



Overall, 72.62% of the respondents were in the age range 35-74. Just over 10% of respondents indicated they preferred not to disclose their age group. The results show the largest proportion of respondents fall in the 55-64 and 65-74 age groups.

Q21. To which of these ethnic groups do you feel you belong?

Response	Number of Respondents	Percentage
White British	1677	77.64%
White Irish	23	1.06%
White Gypsy/Roma	0	0%
White Irish Traveller	1	0.05%
White Other	58	2.69%
Mixed White and Black Caribbean	2	0.09%
Mixed White and Black African	0	0%
Mixed White and Asian	1	0.05%
Mixed Other	8	0.37%
Asian or Asian British Indian	3	0.14%
Asian or Asian British Pakistani	4	0.19%
Asian or Asian British Bangladeshi	1	0.05%
Asian or Asian British Other	1	0.05%
Black or Black British Caribbean	1	0.05%
Black or Black British African	4	0.19%
Black or Black British Other	2	0.09%
Arab	1	0.05%
Chinese	3	0.14%
Other ethnic group	2	0.09%
Prefer not to say	289	13.38%
Not Answered	79	3.66%
Total	2,160	100%

Of those that gave an ethnicity, 81.58% identified as a 'White' group. However, 368 people (17.04% of respondents to this question) chose not to answer this question or selected the "prefer not to say" option.

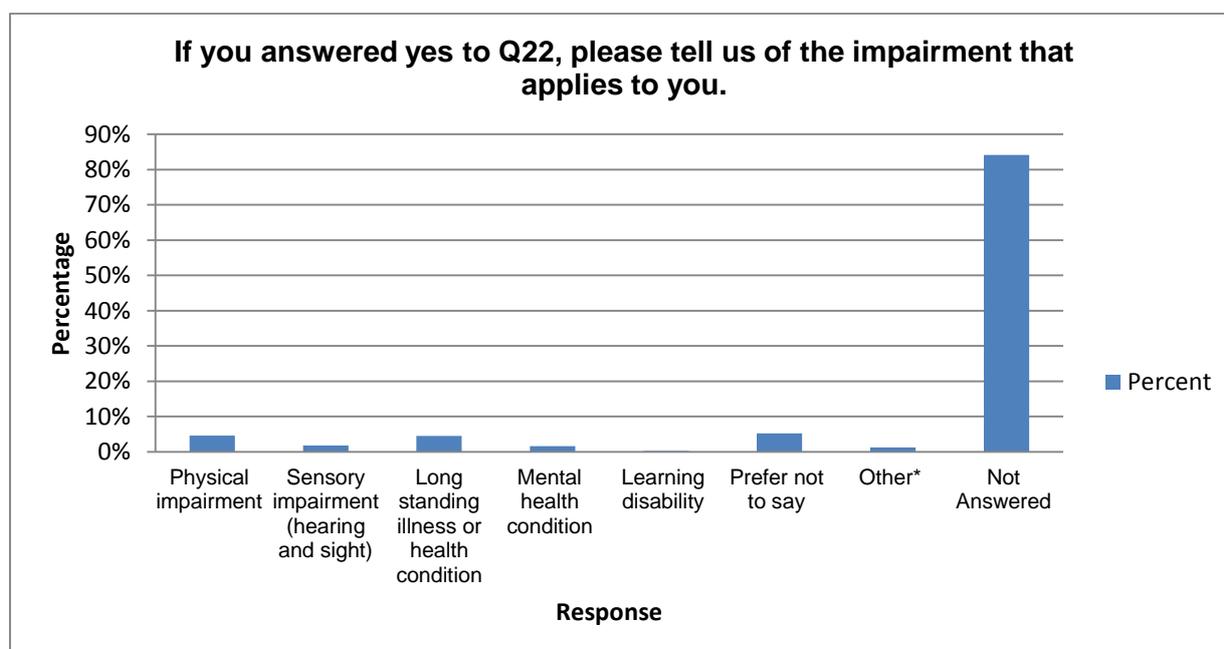
Q23. Do you consider yourself disabled as set out in the Equality Act 2010?

Response	Number of Respondents	Percentage
Option	Total	Percent
Yes	223	10.32%
No	1642	76.02%
Prefer not to say	243	11.25%
Not Answered	52	2.41%
Total	2,160	100%

1,642 (76.02%) of respondents indicated they were not disabled, 223 (10.32%) respondents indicated they are disabled, 243 (11.25%) respondents preferred not to say and 52 (2.41%) did not answer this question.

Q24. If you answered yes to Q23, please tell us the type of impairment that applies to you.

Option	Total	Percent
Physical impairment	99	4.58%
Sensory impairment (hearing and sight)	39	1.81%
Long standing illness or health condition	98	4.54%
Mental health condition	35	1.62%
Learning disability	6	0.28%
Prefer not to say	114	5.28%
Other*	27	1.25%
Not Answered	1817	84.12%
Total	2,160	100%



In 2016/17, 19% of adults of working age and 45% of adults over State Pension age reported a disability under the terms of Equality Act 2010, with mobility being the most prevalent impairment reported (Source: Family Resources Survey 2016/17).

In the 2011 county data, some 20% of people had a long-term health problem or disability, and in 9% of those their day-to-day activities were significantly limited.

The proportion of respondents who told us they are disabled was much less than this at 10.23%, and of those that told us the type of impairment they had, a physical impairment was the most frequently reported, followed closely by a long standing illness or health condition, with 9.12% having either a physical impairment or a long standing illness or health condition. 5.28% preferred not to say whether they were disabled or not, which could have affected the outcome.

Q25. Do you regard yourself as belonging to any particular religion or belief?

Option	Total	Percent
Yes	601	27.82%
No	1069	49.49%
Prefer not to say	428	19.81%
Not Answered	62	2.87%
Total	2,160	100%

Q26. If you answered yes to Q25, which one?

Option	Total	Percent
Christian	575	26.62%
Buddhist	5	0.23%
Hindu	0	0%
Jewish	6	0.28%
Muslim	6	0.28%
Sikh	0	0%
Not Answered	1568	72.59%
Total	2,160	100%

Not all those that indicated they belonged to a religious or belief group went on to specify which. Of those that did, the clear majority are Christian, levels of the smaller religious groups in the county appear to be broadly reflected in the percentages of survey respondents, albeit in small numbers overall.

The final group of questions (27 and 28) related to sexuality and pregnancy rates among respondents, and these were used specifically for the Equalities Impact Assessment.

10. Conclusions

- 10.1 The consultation on the proposed changes to parking charges in East Sussex was open to all residents, businesses and stakeholders with an interest in the County Council's on street parking arrangements across the county.
- 10.2 A total of 2,161 responses were received via the online consultation hub, a further 32 comments relating to the proposals were submitted via the Eastbourne Parking Review consultation that was running at the same time. 40 email responses were received via the parking.consultation@eastsussex.gov.uk email address, two petitions were also received relating to the proposed parking charges increases, one specific to Lewes and one specific to Eastbourne and two parish councils responded to the consultation.
- 10.3 **Congestion-** There appears to be strong support for ESCC to introduce measures to reduce traffic congestion in our town centres. The proposed increase to parking charges aims to help to reduce vehicle trips and encourage greater use of sustainable modes of transport.
- 10.4 **Improve Air Quality-** Concerns about the local air quality of our town centres were identified through the on line questionnaire with almost two thirds of respondents indicating they feel ESCC should take measures to improve air quality across the county. Incentives such as a reduced resident parking permit for the least polluting vehicles aim to encourage a modal shift to electric vehicles.
- 10.5 **Encourage Sustainable Modes of Transport-** Over half of respondents to the on line questionnaire indicated measures should be taken by East Sussex County Council to encourage more sustainable modes of transport across the county.
- 10.6 **Parking Charges influence parking habits-** The responses suggest almost two thirds of respondents feel parking charges do influence where people park.
- 10.7 **Off Street parking charges should be lower than on street parking charges-** Just over half of the respondents felt off street parking charges should be lower than those on street. As part of this consultation process, we have identified that the majority of off street parking provision in each of the town centres will be cheaper than that of the proposed increases. As part of the intended changes East Sussex County Council welcome greater use of the off street parking facilities which will help to reduce demand for on street parking and in turn reduce the number of vehicles driving around our town centres.
- 10.8 **Cheaper resident permit charges for less polluting vehicles-** Opinion regarding lower charges for permits for less polluting vehicles did not provide a clear majority. A mixed response was received to the question relating to less polluting vehicles benefitting from reduced permit charges with respondents not clearly indicating if they agreed or disagreed with this benefit. By offering a reduction in the permit charge based on vehicle CO2 emissions the County Council can help to encourage greater

use and ownership of less polluting vehicles in Eastbourne, Hastings and Lewes which in turn will help to reduce pollution in our town centres.

10.9 Resident Permit Charges Should Be Aligned Across the County- A mixed response was received to the question relating to less polluting vehicles benefitting from reduced permit charges with respondents not clearly indicating if they agreed or disagreed with this benefit. It is difficult to gauge the reason for the response to this question as the majority of those that responded did not hold any type of permit. Comments submitted in addition to completing the questionnaire suggest a number of respondents feel the requirements for each town centre are different and should be treated as such rather than aligning across the county. Price increases are never popular but aligning permit charges in Eastbourne and Hastings to those in Lewes which are based on vehicle emissions will mean incentives for owning less polluting vehicles will be available to all resident permit holders and this would also be the first parking charges increase in over ten years. Introducing such an incentive should help to achieve one of the main objectives set out in LTP3 which is to reduce air pollution across the county.

10.10 Changes to Visitor and Day Permit Charges- The responses to the proposed increases to visitor and day permit charges suggest there is not widespread support for increasing these charges.. The purpose of the proposed increase is to encourage greater use of sustainable modes of transport wherever possible, using alternative modes of transport will help to reduce vehicle congestion and pollution in the town centres. The level of the proposed day permits still represent good value for money, for example resident visitor day permits only increase to £1.20 per day in Lewes and Eastbourne. The proposed increase for hotel parking permits will still offer value for money and will be cheaper than the standard on street parking charge. For example, in Eastbourne the proposed cost of this permit would be £2 per day. The terms of use of the hotel permit is not changing and all vehicle will be permitted to park until 11 am the following day. The relatively low cost of this permit will continue to assist in helping to boost the visitor economy to East Sussex.

10.11 Changes to On Street Parking Charges Pay & Display- The majority of respondents suggested they did not support the proposed increase to on street pay and display charges. Increasing the cost of on-street P&D charges will encourage people to use alternative sustainable forms of transport and encourage people to use off street car parks first, which will minimise the pressure on on-street parking, help reduce congestion and improve air quality in our towns. The increase in charges for on-street parking across Eastbourne, Hastings and Lewes would range from 20p to £1.90 per hour depending on the location. Blue Badge holders are not impacted by this proposal as they do not have to pay for on-street parking.

10.12 The majority of the comments submitted via the on-line questionnaire or email indicated that respondents felt the proposed increases to parking charges would have a negative effect on the local economy and would contribute to even harder times for the High Street. Most of the responses received related to Eastbourne and these generally centred around how the proposed charges increase would deter visitors from coming to the town. Similar comments were also received relating to Lewes and Hastings, but the number of responses were much lower for both these towns. The Council do not agree that the proposals will have a negative effect on the local economy. Whilst there is often anecdotal evidence there is little published evidence which demonstrates a direct correlation between changes in car park charges and changes in town centre footfall. Charging at a sufficient level to impact driver behaviour, can bolster the local economy by encouraging a 'churn' of visitors

and shoppers, rather than spaces being occupied by a single user for a long period of time. The proposals for the on street parking charges will encourage greater use of off street car parks, reduce the number of vehicles driving on our town centre roads searching for parking spaces and aim to encourage greater use of alternative modes of transport which in turn will reduce harmful emissions and improve air quality. These outcomes will make these towns a more appealing place to work, live and visit and thereby boost the local economy.

10.13As alternative options to the proposals for parking charges, many respondents suggested that the public transport offer could be improved if more people are to change to more sustainable modes of transport, this included the frequency and reliability of bus services and improved cycle routes and cycle storage across the county. The cost of using public transport was also a popular issue. A significant part of the LTP3 Strategy and future direction for East Sussex is to implement infrastructure to support integrated sustainable travel – walking, cycling, public transport, car sharing etc. For example – bus priority measures, cycle lanes and facilities, improvements to pedestrian routes to key trip attractors, better rail / bus /cycle interchanges, less street clutter and enhanced public spaces. The County Council cannot set rail fares or increase the frequency of rail services. We will continue to lobby and work with the rail network to provide as best a service as possible to ensure our town centres are accessible and continue to be a desired destination for our many visitors. With the ongoing pressure on Council budgets, any future Parking Surplus, excluding existing commitments, could be used as a further contribution towards the County Council's public transport costs. The investment in these activities is complimentary to the objectives of our LTP3 in the provision of sustainable transport which assists in reducing congestion and improving air quality in the County. However, these improvements alone will not enable the change in behaviour that the proposals to parking tariffs is seeking to achieve.

10.14Following our analysis of consultation responses and comments, we do not consider that the new information has been presented that would lead us to withdraw our proposals.

APPENDIX 1A – CONSULTATION STAKEHOLDER LIST

Third Sector Organisations	Other organisations included via East Sussex Strategic Partnership
3VA (Eastbourne, Lewes District and Wealden)	East Sussex Fire & Rescue Service
Action in Rural Sussex	Clinical Commissioning Groups in the county
Age UK/Age Concern East Sussex	Highways Agency
Ashdown Forest Conservators	JobCentre Plus
East Sussex Association for the Blind	Kent, Surrey and Sussex Community Rehabilitation Company (Seetec)
Eastbourne Seniors Forum	National Probation Service
Eastbourne Society (Civic)	NHS England - Surrey and Sussex Area Team
Environmental Protection UK	Sussex Associations of Local Councils
Friends of Lewes	Sussex Police
Hastings and St. Leonards Senior Forum	MPs / Councillors
Hastings Older People's Ethnic Group	Stephen Lloyd
Hastings Voluntary Action	Maria Caulfield
Lewes District Seniors Forum	Huw Merriman
Meridian Mature Citizens' Forum	Amber Rudd
Possability People	Nusrat Ghani
Rother Environmental Group	Lloyd Russell-Moyle
Rother Seniors' Forum	East Sussex District & Boroughs
Rother Voluntary Action	Lewes District Council
Seaford Seniors Forum	Hastings Borough Council
SpeakUp	Eastbourne Borough Council
Sussex Community Development Association	Wealden District Council
Sussex Deaf Association, East Sussex Division	Rother District Council
The Friends of Ashdown Forest	Town / Parish Councils
Transition Town Eastbourne	All in East Sussex
Transition Town Hastings	Educational institutions
Transition Town Lewes	University of Brighton
Transition Wadhurst	University of Sussex
Wealden Senior Citizens Partnership	
Public bodies	
Environment Agency	
Hastings Youth Council	
High Weald AONB Unit	
Natural England	
South Downs National Park Authority	

APPENDIX 1B – PERMIT PARKING CHARGES

Current and Proposed Permit Parking Charges

Eastbourne current permit charges				Eastbourne proposed permit charges			
Resident (first permit)	12 Months	6 months	3 months	Resident (first permit)	12 Months	6 months	3 months
Standard	£25	£15	£8	Standard -More than 185g/km of CO2	£95.00	£55.00	£31.25
				Discount -185g/km or less of CO2	£85.00	£50.00	£28.75
				Discount 2 -150g/km or less of CO2	£75.00	£45.00	£26.25
				Discount 3 -120g/km or less of CO2	£55.00	£35.00	£21.25
				Discount 4 -100g/km or less of CO2	£15.00		
Disabled resident	£5			Disabled resident	£6.50		
Resident (second permit)				Resident (second permit)			
Standard	£75	£38	£19	Standard -More than 185g/km of CO2	£130.00	£72.50	£40.00
				Discount -185g/km or less of CO2	£120.00	£67.50	£37.50
				Discount 2 -150g/km or less of CO2	£110.00	£62.50	£35.00
				Discount 3 -120g/km or less of CO2	£90.00	£52.50	£30.00
				Discount 4 -100g/km or less of CO2	£50.00		
Business (all zones)				Business (all zones)			
Petrol or diesel	£420	£210	£105	Petrol or diesel	£546.00	£273.00	£136.50
Electric or LPG	£100	£50	£25	Electric or LPG	£130.00	£65.00	£32.50
Business (single zone)				Business (single zone)			
Petrol or diesel	£220	£110	£55	Petrol or diesel	£286.00	£143.00	£71.50
Electric or LPG	£110	£50	£25	Electric or LPG	£143.00	£65.00	£32.50
Doctor permits	£60			Doctor permits	£78.00		
Voluntary permits	£0.00			Voluntary permits	£0.00		
Day permits				Day permits			
Resident Visitor	£0.50			Resident Visitor	£1.20		
Resident visitor concession	£0.25			Resident visitor concession	£0.60		
Health care worker / carer permits	£0.50			Health care worker / carer permits	£1.20		
Trade permits	£2.00			Trade permits	£4.50		
Hotel guest permits	£1.00			Hotel guest permits	£2.00		

Hastings current permit charges				Hastings proposed permit charges			
Resident (first permit)	12 Months	6 months	3 months	Resident (first permit) - Zones A to F and W	12 Months	6 months	3 months
Resident	£75.00	£37.50	£18.75	Standard -More than 185g/km of CO2	£95.00	£55.00	£31.25
				Discount -185g/km or less of CO2	£85.00	£50.00	£28.75
				Discount 2 -150g/km or less of CO2	£75.00	£45.00	£26.25
				Discount 3 -120g/km or less of CO2	£55.00	£35.00	£21.25
				Discount 4 -100g/km or less of CO2	£15.00		
Resident (second permit)				Resident (second permit) - Zones A to F and W			
Resident	£120.00	£60.00	£30.00	Standard -More than 185g/km of CO2	£130.00	£72.50	£40.00
				Discount -185g/km or less of CO2	£120.00	£67.50	£37.50
				Discount 2 -150g/km or less of CO2	£110.00	£62.50	£35.00
				Discount 3 -120g/km or less of CO2	£90.00	£52.50	£30.00
				Discount 4 -100g/km or less of CO2	£50.00		
Resident Shared (first permit)				Resident Shared (first permit) - Zones G to L and O,S			
Resident Shared	£35.00	£17.50	£8.75	Petrol or diesel	£50.00	£30.00	£20.00
				LPG or compressed gas	£37.51	£22.51	£15.00
				Electric vehicle	£25.00	£15.00	£10.00
Resident Shared (second permit)				Resident Shared (second permit) - Zones G to L and O,S			
Resident Shared	£56.00	£28.00	£14.00	Petrol or diesel	£75.00	£43.00	£27.00
				LPG or compressed gas	£62.51	£35.51	£22.00
				Electric vehicle	£50.00	£28.00	£17.00
Resident Zone S (first permit)							
Resident Zone S	£25.00	£12.50	£6.25				
Resident Zone S (second permit)							
Resident Zone S	£40.00	£20.00	£10.00				
Doctor	£110.00			Doctor	£143.00		
Primary Care Worker	£20.00			Primary Care Worker	£26.00		
Day permits				Day permits			
Resident Visitor (2 hour)	£0.80			Resident Visitor (2 hour)	£1.00		
Resident Visitor (5 hour)	£2.00			Resident Visitor (5 hour)	£2.60		
Business scratch cards (5 hour)	£4.00			Business scratch cards (5 hour)	£5.20		
Business scratch cards (10 hour)	£6.00			Business scratch cards (10 hour)	£7.80		
Business	£200.00			Business	£260.00		

Lewes current permit charges				Lewes proposed permit charges			
Resident (first permit)	12 Months	6 months	3 months	Resident (first permit)	12 Months	6 months	3 months
Standard -More than 185g/km	£95	£55	£31.25	Standard -More than 185g/km of CO2	£95.00	£55.00	£31.25
Discount -185g/km or less	£85	£50	£28.75	Discount -185g/km or less of CO2	£85.00	£50.00	£28.75
Discount 2 -150g/km or less	£75	£45	£26.25	Discount 2 -150g/km or less of CO2	£75.00	£45.00	£26.25
Discount 3 -120g/km or less	£55	£35	£21.25	Discount 3 -120g/km or less of CO2	£55.00	£35.00	£21.25
Discount 4 -100g/km or less	£15			Discount 4 -100g/km or less of CO2	£15.00		
Resident (second permit)				Resident (second permit)			
Standard -More than 185g/km	£130	£72.50	£40	Standard -More than 185g/km of CO2	£130.00	£72.50	£40.00
Discount -185g/km or less	£120	£67.50	£37.50	Discount -185g/km or less of CO2	£120.00	£67.50	£37.50
Discount 2 -150g/km or less	£110	£62.50	£35	Discount 2 -150g/km or less of CO2	£110.00	£62.50	£35.00
Discount 3 -120g/km or less	£90	£52.50	£30	Discount 3 -120g/km or less of CO2	£90.00	£52.50	£30.00
Discount 4 -100g/km or less	£50			Discount 4 -100g/km or less of CO2	£50.00		
Business				Business			
Standard -More than 185g/km	£1,000	£550	£300	Standard -More than 185g/km of CO2	£1,000.00	£550.00	£300.00
Discount -185g/km or less	£900	£500	£275	Discount -185g/km or less of CO2	£900.00	£500.00	£275.00
Discount 2 -150g/km or less	£800	£450	£250	Discount 2 -150g/km or less of CO2	£800.00	£450.00	£250.00
Discount 3 -120g/km or less	£600	£350	£200	Discount 3 -120g/km or less of CO2	£600.00	£350.00	£200.00
Discount 4 -100g/km or less	£200			Discount 4 -100g/km or less of CO2	£200.00		
Falmer current permit charges				Falmer proposed permit charges			
Resident (first permit)	12 Months	6 months	3 months	Resident (first permit)	12 Months	6 months	3 months
Petrol or diesel	£37.50	£22.50	£15	Petrol or diesel	£50.00	£30.00	£20.00
LPG or compressed gas	£28.13	£16.88	£11.25	LPG or compressed gas	£37.51	£22.51	£15.00
Electric vehicle	£18.75	£11.25	£7.50	Electric vehicle	£25.00	£15.00	£10.00
Resident (second permit)				Resident (second permit)			
Petrol or diesel	£56.25	£32.25	£20.25	Petrol or diesel	£75.00	£43.00	£27.00
LPG or compressed gas	£46.88	£26.63	£16.50	LPG or compressed gas	£62.51	£35.51	£22.00
Electric vehicle	£37.50	£21	£12.75	Electric vehicle	£50.00	£28.00	£17.00
Lewes & Falmer Day permits				Lewes & Falmer Day permits			
Resident Visitor	0.9			Resident Visitor	£1.20		
Resident visitor concession	0.4			Resident visitor concession	£0.60		
Health care worker / carer permits	0.9			Health care worker / carer permits	£1.20		
Trade permits	£3.50			Trade permits	£4.50		
Hotel guest permits	0.9			Hotel guest permits	£2.00		

APPENDIX 1C – ON STREET PARKING CHARGES

Eastbourne							
Current							
				Summer	Winter		
Length of Stay	2hr Max Stay	2hr Max Stay	4hr Max Stay	Seafront	Seafront	Seafront (summer only)	Coach Bay
15mins	£0.20	£0.20	£0.20	£0.20	£0.20	£0.20	£2.00
30mins	£1.00	£0.50	£0.40	£0.40	£0.20	£0.40	£2.00
1hour	£2.00	£1.00	£1.00	£0.80	£0.20	£0.80	£2.00
2 hours	£3.00	£2.00	£2.00	£1.50	£0.20	£1.50	£4.00
4 hours			£3.00	£2.50	£1.20	£2.50	£4.00
6 hours				£3.00	£1.50	£3.00	
All Day				£4.00	£4.00	£4.00	
Proposed							
				Summer	Winter		
Length of Stay	2hr Max Stay	2hr Max Stay	4hr Max Stay	Seafront	Seafront	Seafront (summer Only)	Coach Bay
15mins	£0.40	£0.40	£0.40	£0.40	£0.40	£0.40	£3.90
30mins	£1.95	£1.00	£1.00	£0.80	£0.40	£0.80	£3.90
1hour	£3.90	£1.95	£1.95	£1.60	£0.40	£1.60	£3.90
2 hours	£5.85	£3.90	£3.90	£2.95	£0.80	£2.95	£7.80
4 hours			£5.85	£4.90	£2.35	£4.90	£7.80
6 hours				£5.85	£2.95	£5.85	
All Day				£7.80	£7.80	£7.80	

Lewes							
Current				Proposed			
Length of Stay	High Street	Intermediate	Outer	Length of Stay	High Street	Intermediate	Outer
15 mins	£0.50			15 mins	£1.00		
30 mins	£1.00	£0.30		30 mins	£1.95	£0.60	
1 hr	£2.00	£0.60	£0.30	1 hr	£3.90	£1.20	£0.60
2 hr	£4.00	£1.20	£0.60	2 hr	£7.80	£2.40	£1.20
3 hr		£1.80	£1.20	3 hr		£3.60	£2.40
4 hr		£2.40	£1.50	4 hr		£4.80	£3.00
5 hr		£3.00	£1.50	5 hr		£6.00	£3.00
6 hr		£3.60		6 hr		£7.20	
7 hr		£4.20		7 hr		£8.40	
8 hr		£4.80		8 hr		£9.60	
9 hr		£5.40		9 hr		£10.80	
10 hr		£6.00		10 hr		£12.00	

Hastings											
Current											
		Winter									
Length of Stay	Old Town 4hr max stay 2h in High Street	Old Town 4hr max stay 2 hr in high Street	Central Area 2 hr max stay & Wellington Square 2 hr max stay	Cornwallis Street, Devonshire Road, South Terrace 2hr max Stay	Market Area 2hr max stay	Low tariff 4 hr max stat	Cambridge Gardens, Cornwallis Gardens, Cornwallis Terrace, Eversfield Place 4 hr max stay	Castle Hill Road, Priory Road 4 hr max stay & Wellington Road 4 hr max stay	Coaches only	Station Approach (St Leonards)	Rock A Nore Road
20 mins	£0.50	£0.20	£0.50			£0.10					
30mins		£0.50		£0.50	£0.60		£0.50	£0.30			£0.50
1hour	£1.50	£1.00	£1.50	£1.00	£1.20	£0.30	£1.00	£0.60	£1.00	£0.10	
2 hours	£3.00	£2.00	£3.00	£2.00	£2.40	£0.60	£2.00	£1.20	£2.00	£0.20	
3 hours	£4.50	£3.00				£0.90	£3.00	£1.80	£3.00		
4 hours	£6.00	£4.00				£1.20	£4.00	£2.40	£4.00		
9 hours									£9.00	£2.00	
Up to 10 hours									£10.00		
Proposed											
		Winter									
Length of Stay	Old Town 4hr max stay 2h in High Street	Old Town 4hr max stay 2 hr in high Street	Central Area 2 hr max stay & Wellington Square 2 hr max stay	Cornwallis Street, Devonshire Road, South Terrace 2hr max Stay	Market Area 2hr max stay	Low tariff 4 hr max stat	Cambridge Gardens, Cornwallis Gardens, Cornwallis Terrace, Eversfield Place 4 hr max stay	Castle Hill Road, Priory Road 4 hr max stay & Wellington Road 4 hr max stay	Coaches only	Station Approach (St Leonards)	Rock A Nore Road
20 mins	£1.00	£0.40	£1.00			£0.20					
30mins		£1.00		£1.00	£1.20		£1.00	£0.60			£1.00
1hour	£2.95	£1.95	£2.95	£2.00	£2.40	£0.60	£2.00	£1.20	£1.95	£0.20	
2 hours	£5.90	£3.90	£5.90	£4.00	£4.80	£1.20	£4.00	£2.40	£3.90	£0.40	
3 hours	£8.85	£5.85				£1.80	£6.00	£3.60	£5.85		
4 hours	£11.80	£7.80				£2.40	£8.00	£4.80	£7.80		
9 hours									£17.55	£3.90	
Up to 10 hours									£19.50		

APPENDIX 1D – OFF STREET PARKING PROVISION

Summary of Lewes Off Street Parking Provision

The table below provides a summary of the number of spaces in each off street car park, the closet parking zone to the car park, the maximum stay and the maximum charge.

Car Park	Spaces	Chargable Hours Mon to Sat	Sun	Max Charge	Max Stay	Closet Zone
Spring Gardens	20	9am to 5pm	Free	£1.90	8 hours	B
Brook Street	90	9am to 5pm	Free	£1.90	8 hours	B
Corporation Wharf	80	8am to 6pm	Free	£2.00	12 hours	B
Cliffe High Street	11	9am to 5pm	Free	£1.80	2 hours	C
South Street (North)	13	9am to 5pm	Free	£1.80	2 hours	C
Pinwell Road	25	9am to 5pm	Free	£4.10	8 hours	D
Mountfield Road	54	9am to 5pm	Free	£4.10	8 hours	D
Lewes Station	289	24 hours	£2.25	£6.60	24 hours	D
Friars Walk	74	9am to 5pm	Free	£1.80	2 hours	D
The Maltings	25	9am to 5pm	Free	£4.00	4 hours	HS & D
Phoenix Causway	90	9am to 5pm	Free	£4.10	8 hours	HS&B
Little East Street	30	9am to 5pm	Free	£3.50	4 hours	HS&B
East Street	23	9am to 5pm	Free	£3.50	4 hours	HS&B
Westgate Street	27	9am to 5pm	Free	£3.50	4 hours	HS&B
Eastgate Wharf	50	24 hours	24 hours	£7.90	24 hours	HS&B
West Street	49	9am to 5pm	Free	£1.80	2 hours	HS&B
County Hall (West CP)	393	8am to 6pm	Free	£7.80	3 hours	
Total Off Street Spaces -	1243					

Summary of Eastbourne Off Street Parking Provision

The table below provides a summary of the number of spaces in each off street car park, the closet parking zone to the car park, the maximum stay and the maximum charge.

Car Park	Spaces	Chargeable Hours Mon to Sat	Sun	Max Charge	Max Stay	Closet Zone
Junction Road	600	8am to Midnight	Free	£3.50	16 hours	A/G
Southfields Road	26	8am to 6pm	8am to 6pm	£2	4 hours	G
Eastbourne Railway Station	341	24 hours	24 hours	£5.30	N/A	A/G
Hyde Gardens	86	8am to 6pm	Free	£3	2 hours	G
Princes Park	170	8am to 6pm	8am to 6pm	£4.80	N/A	O/S of Zone
Redoubt Car Park	138	8am to 6pm	8am to 6pm	£5.00	10 hours	O/S of Zone
Wish Tower	35	8am to 6pm	8am to 6pm	£14	12 hours	N
Trinity Place	414	24 hours	24 hours	£6	24 hours	S
Devonshire Park	121	8am to 6pm	8am to 6pm	£6.50	12 hours	S/N
The Beacon	700	8am to Midnight	Free	£16	16 hours	A/G
Total Spaces -	2,631					

Summary of Hastings Off Street Parking Provision

The table below provides a summary of the number of spaces in each off street car park, the closet parking zone to the car park, the maximum stay and the maximum charge.

Car Park	Spaces	Chargeable Hours Mon to Sat	Sun	Max Charge	Max Stay	Closest Zone
Falaise Hall	35	8am to 9pm	Free	£2.00	4 hours	A
The Pier	40	7am to 9pm	7am to 9pm	£8.00	24 hours	B
Falaise Road	53	8am to 9pm	Free	£2.00	4 hours	B
Saint Margarets Road	40	7am to 9pm	7am to 9pm	£8.00	24 hours	A
Summerfields	101	8am to 9pm	Free	£2.00	4 hours	O/S
Hastings Station	66	24 hours	24 hours	£5.60	24 hours	E
Priory Street	250	7am to 9pm	7am to 9pm	£8.00	24 hours	B
Carlisle Parade	171	7am to 9pm	7am to 9pm	£8.00	24 hours	B
Priory Meadows	1086	6am to Midnight	7am to 11pm	£5.50	18 hours	B/E
Cornwallis Street	71	7am to 9pm	7am to 9pm	£4.00	4 hours	E
Castle Hill	81	7am to 9pm	7am to 9pm	£9.00	14 hours	D
Pelham Place	276	7am to 9pm	7am to 9pm	£9.00	14 hours	D
The Bourne	29	7am to 9pm	7am to 9pm	£9.00	24 hours	F
Rock-A-Nore Road	450	7am to 9pm	7am to 9pm	£9.00	24 hours	F
Total Off Street Spaces -	2,749					

APPENDIX 1E - Public Consultation Questionnaire

Give Us Your Views

Q1. To what extent do you agree that East Sussex County Council should take measures to assist in reducing traffic congestion in our town centres?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

Q2. To what extent do you agree that East Sussex County Council should take measures to improve local air quality and reduce vehicle emissions?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

Q3. To what extent do you agree that East Sussex County Council should take measures to encourage people to use more sustainable forms of transport and/or to use vehicles that emit lower levels of pollutants?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

Q4. To what extent do you agree that the cost of the existing parking charges influences where people park?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

Q5. To what extent do you agree that increasing parking charges will encourage some people to use more sustainable forms of transport?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

6. To what extent do you agree that charges in off-street car parks should be lower than adjacent on-street parking charges to encourage more people to park off-street where possible and assist keeping traffic flowing more freely on the surrounding roads?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

Q7. To what extent do you agree that people who use less polluting vehicles should pay less for their resident permit?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

Q8. To what extent do you agree with the proposals that people living in Eastbourne and Hastings should pay the same for their resident permit as those who live in Lewes?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

Q9. To what extent do you agree with the proposed changes to visitor and day permit charges?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

Q10. To what extent do you agree with the proposed increases to on-street Pay & Display parking charges?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

Q11. Do you have any of the following parking permits?

- Lewes resident parking permit
- Eastbourne resident parking permit
- Hastings resident parking permit
- Other resident parking permit
- Do not have a resident parking permit

Q12. Do you have any of the following types of parking permit?

- | | |
|--|---|
| <input type="checkbox"/> Eastbourne business | <input type="checkbox"/> Hastings doctor |
| <input type="checkbox"/> Eastbourne doctor | <input type="checkbox"/> Hastings PCW |
| <input type="checkbox"/> Eastbourne healthcare and carer | <input type="checkbox"/> Hastings visitor |
| <input type="checkbox"/> Eastbourne hotel | <input type="checkbox"/> Lewes business |
| <input type="checkbox"/> Eastbourne trade | <input type="checkbox"/> Lewes healthcare and carer |
| <input type="checkbox"/> Eastbourne visitor | <input type="checkbox"/> Lewes hotel |
| <input type="checkbox"/> Falmer visitor | <input type="checkbox"/> Lewes trade |
| <input type="checkbox"/> Hastings business user | <input type="checkbox"/> Lewes visitor |
| <input type="checkbox"/> Hastings business annual | <input type="checkbox"/> Other |

Q13. Do you have other comments on the consultation or alternative suggestions which would help reduce congestion and improve air quality in our town centres?

- No
- Yes

About you

We want to make sure that everyone is treated fairly and equally and that no one gets left out. That's why we ask you these questions.

We won't share the information you give us with anyone else. We will only use it to help us make decisions and make our services better.

If you would rather not answer any of these questions, you don't have to.

The [privacy notice](#) for the hub can be found on the following link:

<https://www.eastsussex.gov.uk/privacy/consultation-hub/>

Q14. Are you responding as a resident or as part of an organisation? Please tick one box

- Resident
- Organisation
- Non-Resident
- Prefer not to say

Q15. Are you.....? Please tick one box

- Male
- Female
- Prefer not to say

Q16. Do you identify as a transgender or trans person? Please tick one box

- Yes
- No
- Prefer not to say

Q17. Which of these age groups do you belong to? Please tick one box

- under 18
- 18-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65-74
- 75-84
- 85+
- Prefer not to say

Q18. What is your postcode?

Q23. If you answered yes to Q25, which one? Please tick one box

- Christian Hindu Muslim Any other religion, please specify
- Buddhist Jewish Sikh
-

Q24. Are you... Please tick one box

- Bi/Bisexual Gay woman/Lesbian Other
- Heterosexual/Straight Gay Man Prefer not to say

Q25. Are you currently pregnant or have you been pregnant in the last year? Please tick one box

- Yes No Prefer not to say

Thank you for taking the time to complete this questionnaire. Your views are important to us.

Completed surveys can be handed to staff at East Sussex libraries or posted back to us at:
Parking Tariff Consultation, B Floor, County Hall, St Anne's Crescent, Lewes, BN7 1UE.



Equality Impact Assessment

Project or Service Template

Name of the proposal, project or service
Parking charges review

File ref:		Issue No:	
Date of Issue:		Review date:	

Contents

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Part 1 – The Public Sector Equality Duty and Equality Impact Assessments (EIA)

1.1 The Council must have due regard to its Public Sector Equality Duty when making all decisions at member and officer level. An EIA is the best method by which the Council can determine the impact of a proposal on equalities, particularly for major decisions. However, the level of analysis should be proportionate to the relevance of the duty to the service or decision.

1.2 This is one of two forms that the County Council uses for Equality Impact Assessments, both of which are available on the intranet. This form is designed for any proposal, project or service. The other form looks at services or projects.

1.3 The Public Sector Equality Duty (PSED)

The public sector duty is set out at Section 149 of the Equality Act 2010. It requires the Council, when exercising its functions, to have “due regard” to the need to

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it. (see below for “protected characteristics”

These are sometimes called equality aims.

1.4 A “protected characteristic” is defined in the Act as:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race (including ethnic or national origins, colour or nationality)
- religion or belief;
- sex;
- sexual orientation.

Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination.

The previous public sector equalities duties only covered race, disability and gender.

1.5 East Sussex County Council also considers the following additional groups/factors when carry out analysis:

- Carers – A carer spends a significant proportion of their life providing unpaid support to family or potentially friends. This could be caring for a relative, partner or friend who is ill, frail, disabled or has mental health or substance misuse problems. [Carers at the Heart of 21stCentury Families and Communities, 2008]
- Literacy/Numeracy Skills
- Part time workers
- Rurality

1.6 Advancing equality (the second of the equality aims) involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristic
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people including steps to take account of disabled people's disabilities
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

NB Please note that, for disabled persons, the Council must have regard to the possible need for steps that amount to positive discrimination, to "level the playing field" with non-disabled persons, e.g. in accessing services through dedicated car parking spaces.

1.6 Guidance on Compliance with The Public Sector Equality Duty (PSED) for officers and decision makers:

1.6.1 To comply with the duty, the Council must have "due regard" to the three equality aims set out above. This means the PSED must be considered as a factor to consider alongside other relevant factors such as budgetary, economic and practical factors.

1.6.2 What regard is "due" in any given case will depend on the circumstances. A proposal which, if implemented, would have particularly negative or widespread effects on (say) women, or the elderly, or people of a particular ethnic group would require officers and members to give considerable regard to the equalities aims. A proposal which had limited differential or discriminatory effect will probably require less regard.

1.6.3 *Some key points to note :*

- The duty is regarded by the Courts as being very important.
- Officers and members must be aware of the duty and give it conscious consideration: e.g. by considering open-mindedly the EIA and its findings when making a decision. When members are taking a decision, this duty can't be delegated by the members, e.g. to an officer.
- EIAs must be evidence based.
- There must be an assessment of the practical impact of decisions on equalities, measures to avoid or mitigate negative impact and their effectiveness.
- There must be compliance with the duty when proposals are being formulated by officers and by members in taking decisions: the Council can't rely on an EIA produced after the decision is made.
- The duty is ongoing: EIA's should be developed over time and there should be evidence of monitoring impact after the decision.
- The duty is not, however, to achieve the three equality aims but to consider them – the duty does not stop tough decisions sometimes being made.
- The decision maker may take into account other countervailing (i.e. opposing) factors that may objectively justify taking a decision which has negative impact on equalities (for instance, cost factors)

1.6.4 In addition to the Act, the Council is required to comply with any statutory Code of Practice issued by the Equality and Human Rights Commission. New Codes of Practice under the new Act have yet to be published. However, Codes of Practice issued under the previous

legislation remain relevant and the Equality and Human Rights Commission has also published guidance on the new public sector equality duty.

Part 2 – Aims and implementation of the proposal, project or service

2.1 What is being assessed?

- a) **Proposal or name of the project or service.** Parking charges review.
- b) **What is the main purpose or aims of proposal, project or service?** The main purpose is to review and increase parking charges across the three different parking schemes to manage the demand for parking and to improve and reduce damage to the environment as set out in our Local Transport Plan (LTP). This would be achieved by increasing visitor permit prices and on street parking charges (approximately increasing them by 100%) to encourage the use of off street parking or more sustainable modes of transport. It is also proposed that resident permit tariffs charged in Eastbourne and Hastings are changed to follow the Lewes District model for resident permit charges to encourage the use of lower emission vehicles.

Each of the three Civil Parking Enforcement (CPE) areas were set up some years apart from each other and with varying types of parking provision to satisfy the needs of the local community. Different types of permits reflect the differing restrictions in each of the areas. Since their introduction, increasing car ownership and use and parking pressures are adding to the traffic management problems experienced by many towns both in terms of congestion on major routes. Additionally, this can increase vehicle- emitted pollutants to the detriment of air quality.

Alongside strategies that aim to encourage more sustainable modes of travel (for example car sharing, public transport, cycling or walking), managing the demand for parking can contribute to those wider transport planning objectives. The main way in which parking demand is managed has tended to be by limiting the supply of spaces available. This is traditionally achieved by on street parking schemes with controls on who is able to park, for how long and a charge to do so. Pricing also tends to be set at a level to encourage use of nearby off-street car parks.

- c) **Manager(s) and section or service responsible for completing the assessment**

Daniel Clarke, Parking Team Manager within the Transport and Operational Services in Communities, Economy & Transport Department.

2.2 Who is affected by the proposal, project or service? Who is it intended to benefit and how?

This proposal has the potential to affect all current users and future users of the on street parking schemes.

2.3 How is, or will, the proposal, project or service be put into practice and who is, or will be, responsible for it?

East Sussex County Council is responsible for the CPE schemes in East Sussex. Implementation of the proposals will be overseen by the Parking Team manager and the Head of Service for Transport and Operational Services.

A public consultation was carried out between 1 July and 11 August to gain feedback on the proposal for changes to the parking charges. This was publicised in the local press, on the Councils website, social media, all pay and display machines and all permit holders were written to.

NSL is contracted by the County Council to manage the enforcement, pay and display and permit service and will be expected to implement any operational changes. We will give people notice of the changes to in parking charges before being implemented using local press and social media and write to existing permit holders. Other Council departments and community partners will be important, such as the Communications Team.

2.4 Are there any partners involved? E.g. NHS Trust, voluntary/community organisations, the private sector? If yes, how are partners involved?

In July 2018 NSL, was appointed as our parking enforcement contractor for a period of five years, with the option to extend for a further five years beyond that.

2.5 Is this proposal, project or service affected by legislation, legislative change, service review or strategic planning activity?

Civil parking enforcement forms part of the Traffic Management Act 2004. This sets out the legislation and processes for the management and enforcement of parking schemes.

2.6 How do people access or how are people referred to your proposal, project or service? Please explain fully.

People access this service when parking in one of the CPE schemes, paying for permits and through on street parking charges.

2.7 If there is a referral method how are people assessed to use the proposal, project or service? Please explain fully.

There is no referral method.

2.8 How, when and where is your proposal, project or service provided? Please explain fully.

In Eastbourne and Hastings Boroughs and Lewes District we operate CPE schemes. Some parking restrictions apply at all times of the day every day of the year for example double yellow lines and zig zags at crossings, whilst others only apply on certain days and times for example permit restrictions and pay and display parking.

Part 3 – Methodology, consultation, data and research used to determine impact on protected characteristics.

3.1 List all examples of quantitative and qualitative data or any consultation information available that will enable the impact assessment to be undertaken.

Types of evidence identified as relevant have X marked against them			
	Employee Monitoring Data		Staff Surveys
	Service User Data		Contract/Supplier Monitoring Data
x	Recent Local Consultations		Data from other agencies, e.g. Police, Health, Fire and Rescue Services, third sector
	Complaints		Risk Assessments
	Service User Surveys		Research Findings
x	Census Data		East Sussex Demographics
	Previous Equality Impact Assessments		National Reports
	Other organisations Equality Impact Assessments	x	Any other evidence?

3.2 Evidence of complaints against the proposal, project or service on grounds of discrimination.

We had no direct complaints about the proposed parking charges discriminating any against anyone with a protected characteristic.

3.3 If you carried out any consultation or research on the proposal, project or service explain what consultation has been carried out.

Consultation was carried out between 1 July and 11 August 2019. The consultation was open to all members of the public, businesses and stakeholders.

Research into the three parking schemes and the rationale for the charges that were set when the schemes were introduced has been done. This included understanding

- the differences in the charges between the three schemes.
- Any changes to the charges that have been made since each of the schemes was introduced.
- Concerns about air quality.
- Changes to off street parking charges.

3.4 What does the consultation, research and/or data indicate about the positive or negative impact of the proposal, project or service?

Charges for on-street parking have not been significantly changed for several years as follows:

- Eastbourne October 2008
- Hastings January 2008
- Lewes July 2007

In that time off street parking charges in the district and boroughs have increased.

Since the last time charges were reviewed, the Retail Prices index (RPI) has increased:

Eastbourne 30%

Hastings 35%

Lewes 37%

Increasing concerns about reductions in air quality are leading to many local authorities setting higher parking prices for higher emission vehicles and some authorities are also investigating traffic management schemes that prohibit certain vehicle emission types altogether in city centres.

It is common practice across the country for on street parking charges to be set at a level above nearby off-street car parks, to retain some fiscal encouragement to use those facilities first and so minimise the pressure upon on street parking.

The consultation showed that there was support for implementing measures to reduce traffic congestion, improve air quality and reduce vehicle emissions in our town centres. There was also an indication greater encouragement should be made to promote the use of more sustainable modes of transport such as buses, cycling and walking.

Part 4 – Assessment of impact

4.1 Age: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic reflected in the County/District/Borough?

Population estimates for 2016, East Sussex and Districts/Boroughs (Percentage)

Age group	0-15	16-24	25-34	35-44	45-54	55-64	65-74	75-84	85+
East Sussex	17.1	9.2	9.8	10.8	14.7	13.2	13.4	7.9	4
Eastbourne	17.2	10.1	11.2	11.5	13.4	11.9	12.3	7.8	4.5
Hastings	18.7	10.5	12.3	11.8	14.9	12.4	11	5.6	2.8
Lewes	17.4	8.8	9.6	11.1	14.9	13.2	13.1	8	4

Source: East Sussex in Figures, (ONS revised mid-year estimates - revised district level data, March 2018)

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

We do not collect age information as part of the parking schemes.

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

People of all ages who park in an area of the CPE scheme where charges apply will be impacted by the increased charges.

Those people of working age who have to drive to work and choose to park in an area of the CPE scheme where charges apply, may be more impacted than other car users.

Retired people may have less disposable income to be able to pay the increased parking charges, but also have access to free bus travel. Children and young people under the age of 17 who do not drive will not be directly impacted by the proposals.

d) What is the proposal, project or service's impact on different ages/age groups?

As above, people of all ages who park in the controlled parking zones will be impacted by the increased charges.

e) What actions are to/or will be taken to avoid any negative impact or to better advance equality?

We will give people notice of the increase in charges and write to existing permit holders. Free bus travel will remain available for those eligible.

f) Provide details of the mitigation.

There is likely to be only minimal impact as a result of the service changes. As we do now, we will continue to consider the individual circumstances of any person adversely impacted.

g) How will any mitigation measures be monitored?

We will continue to monitor the responses to our customer satisfaction surveys and feedback from representative groups.

4.2 Disability: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic reflected in the County /District/Borough?

Residents with limiting long-term illness and disability, East Sussex and District (Percentage)

	East Sussex	Eastbourne	Hastings	Lewes
People with long-term health problem or disability	20.3	21	22.1	19.5
People without long-term health problem or disability	79.7	79	77.9	80.5
Day-to-day activities limited a little	11.2	11.3	11.5	10.9
Day-to-day activities limited a lot	9.2	9.7	10.6	8.7

Source: Census 2011, East Sussex in Figures.

Note that 'Day-to-day activities limited a little' and 'Day-to-day activities limited a lot' are as a proportion of the percentage of those with a long-term health problem or disability.

b) How is this protected characteristic reflected in the reflected in the population of those impacted by the proposal, project or service?

People with long term mobility disabilities are able to apply for a Blue Badge which is a government scheme to provide better access for those with mobility issues. Our parking schemes recognise this national scheme and have concessions in place for those with mobility problems.

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

No.

d) What is the proposal, project or service's impact on people who have a disability?

There will be no difference or change to the current arrangements.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

The current arrangements will remain the same, therefore there will be no change to the impact.

f) Provide details of any mitigation.

We will continue to ensure that users are well informed of the ranges of parking concessions available. We will continue to listen to feedback from users to try to continue to improve accessibility.

g) How will any mitigation measures be monitored?

We will continue to monitor the proportion of permits sold to disabled or housebound customers using our permit system.

We will continue to monitor the responses to our customer satisfaction surveys and feedback from representative groups.

4.3 Ethnicity: Testing of disproportionate, negative, neutral or positive impact. Race categories are: Colour. E.g. being black or white, Nationality e.g. being a British, Australian or Swiss citizen, Ethnic or national origins e.g. being from a Roma background or of Chinese Heritage

a) How is this protected characteristic reflected in the County /District/Borough?

Ethnic group in 2011 – East Sussex and Districts (Percentage)

Ethnicity	All White	All Mixed	All Asian or Asian British	All Black or Black British	Other ethnic group
East Sussex	96	1.4	1.7	0.6	0.3
Eastbourne	94.1	1.8	2.8	0.8	0.5
Hastings	93.8	2.2	2.4	1.2	0.5
Lewes	96.6	1.3	1.4	0.4	0.3

Source: Census 2011, East Sussex in Figures

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

We do not collect ethnicity information in connection with our parking schemes.

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

No. The proposals are not expected to have any specific impact on individuals from different ethnic backgrounds as it is considered that the service will continue to meet or support the needs of current and future users, regardless of ethnicity.

d) What is the proposal, project or service’s impact on those who are from different ethnic backgrounds?

As above

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

N/A

f) Provide details of any mitigation.

N/A

g) How will any mitigation measures be monitored?

N/A

4.4 Gender/Transgender: Testing of disproportionate, negative, neutral or positive impact

a) How is this protected characteristic target group reflected in the County/District/Borough?

Table 7: Population by gender in 2011 – East Sussex and Districts (Percentage)

	Females	Males
East Sussex	51.8	48.2
Eastbourne	52.2	47.8
Hastings	51.2	48.8
Lewes	51.4	48.6

Source: Census 2011, East Sussex in Figures

Statistics about the number of transgender people are not available from the 2011 Census. However, the Gender Identity Research & Education Society estimates that about 1% of the British population are gender nonconforming to some degree with numbers of trans boys and trans girls being about equal.

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

We do not collect gender information in connection with our parking schemes.

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

One gender is not expected to be any more affected than another.

d) What is the proposal, project or service's impact on different genders?

See above.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

N/A

f) Provide details of any mitigation.

N/A

g) How will any mitigation measures be monitored?

N/A

4.5 Marital Status/Civil Partnership: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic target group reflected in the County/District/Borough?

Table 9: Marital status in 2011 - East Sussex and Districts (Percentage)

Marital Status	Single	Married	In a registered same-sex civil partnership	Separated	Divorced	Widowed
East Sussex	29.1	48.4	0.3	2.7	10.7	8.7
Eastbourne	33.3	42.8	0.4	3	11.5	9.1
Hastings	36.5	39.2	0.3	3.7	12.8	7.4
Lewes	28.7	49.6	0.5	2.5	10.2	8.4

Source: Census 2011, East Sussex in Figures

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

We do not collect marital status/ civil partnership gender information in connection with our parking schemes.

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

No. Our parking schemes are provided to all users irrespective of their marital status.

d) What is the proposal, project or service's impact on people who are married or same sex couples who have celebrated a civil partnership?

As above.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

N/A

f) Provide details of any mitigation.

N/A

g) How will any mitigation measures be monitored?

N/A

4.6 Pregnancy and maternity: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic target group reflected in the County/District/Borough?

The crude birth rate per 1000 of population in East Sussex in 2016 was 9.5 (source: East Sussex in Figures), or around 1% of the population.

- b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

We do not collect pregnancy or maternity information in connection with our parking schemes.

- c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

No. Our parking schemes are provided to all users irrespective of pregnancy.

- d) What is the proposal, project or service's impact on pregnant women and women within the first 26 weeks of maternity leave?**

As above.

- e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

N/A

- f) Provide details of the mitigation**

N/A

- g) How will any mitigation measures be monitored?**

N/A

4.7 Religion, Belief: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic reflected in the County/District/Borough?

Table 12: Religion in 2011 – East Sussex and Districts (Percentage)

Religions	East Sussex	Eastbourne	Hastings	Lewes
Christian	59.9	59.6	51.9	57
Buddhist	0.4	0.5	0.5	0.5
Hindu	0.3	0.4	0.5	0.3
Jewish	0.2	0.2	0.2	0.3
Muslim	0.8	1.5	1.3	0.6
Sikh	0	0.1	0	0
Other religions	0.7	0.6	0.7	0.6
No religion	29.6	29.2	36.6	32.5
Religion not stated	8.1	8	8.3	8.2

Source: Census 2011, East Sussex in Figures

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

We do not collect religion or belief information in connection with our parking schemes.

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

No. Our parking schemes are provided to all users irrespective of religion or belief.

d) What is the proposal, project or service's impact on the people with different religions and beliefs?

As above.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

N/A

f) Provide details of any mitigation.

N/A

g) How will any mitigation measures be monitored?

N/A

4.8 Sexual Orientation - Gay, Lesbian, Bisexual and Heterosexual: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic reflected in the County/District/Borough?

No local data is available on sexual orientation.

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

We do not collect sexual orientation information in connection with our parking schemes.

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

No. Our parking schemes are provided to all users irrespective of sexual orientation.

d) What is the proposal, project or service's impact on people with differing sexual orientation?

As above.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

N/A

f) Provide details of the mitigation

N/A

g) How will any mitigation measures be monitored?

N/A

4.9 Other: Additional groups/factors that may experience impacts - testing of disproportionate, negative, neutral or positive impact.

4.9.1 Additional Factor 1: Carers

a) How are these groups/factors reflected in the County/District/ Borough?

Provision of unpaid care in 2011 – East Sussex and District (Percentage)

	People provide no unpaid care	People provide unpaid care	Provides 1 to 19 hours unpaid care a week	Provides 20 to 49 hours unpaid care a week	Provides 50 or more hours unpaid care a week
East Sussex	88.7	11.3	7.5	1.3	2.5
Eastbourne	89.4	10.6	6.7	1.3	2.6
Hastings	89.5	10.5	6.3	1.5	2.7
Lewes	88.2	11.8	8.2	1.2	2.4

Source: Census 2011, East Sussex in Figures

b) How is this group/factor reflected in the population of those impacted by the proposal, project or service?

We do not collect carer information in connection with our parking schemes.

- c) Will people within these groups or affected by these factors be more affected by the proposal, project or service than those in the general population who are not in those groups or affected by these factors?**

The proposals are not expected to have any specific impact on individuals or organisations that provide care as the service will continue to meet or support the needs of current and future users. An increase to the cost of carer permits may impact some carers.

- d) What is the proposal, project or service's impact on the factor or identified group?**

Permits will still be available to individuals and organisations that provide care, any impact of a charge increase should be small.

- e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

The charges proposed have been calculated to cover the costs of the scheme. There will be no change to the availability of parking or permits.

- f) Provide details of the mitigation.**

The potential impacts of the service changes are likely to be small. As we do now, we will continue to consider the individual circumstances of any person adversely impacted.

- g) How will any mitigation measures be monitored?**

We will continue to monitor the sale of carer permits and the feedback from customer surveys.

4.9.2 Additional Factor 2: Literacy and numeracy skills

- a) How are these groups/factors reflected in the County/District/ Borough?**

There are areas of East Sussex which are among the top 10 most deprived wards in England for working age adults with no or low qualifications, or who cannot speak English well or at all. Parts of the county have an adult population with skills below a level which means they could compare products and services for the best buy, or work out a household budget.

There is variance across the county, Lewes has the lowest percentage at 3.7% of working age residents with no qualifications (2,200 residents). Source: Annual Population Survey, 2017, East Sussex in Figures.

- b) How is this group/factor reflected in the population of those impacted by the proposal, project or service?**

No information about literacy and numeracy is collected as part of our parking schemes.

- c) Will people within these groups or affected by these factors be more affected by the proposal, project or service than those in the general population who are not in those groups or affected by these factors?**

No.

- d) **What is the proposal, project or service’s impact on the factor or identified group?**

None.

- e) **What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

N/A

- f) **Provide details of the mitigation.**

N/A

- g) **How will any mitigation measures be monitored?**

N/A

4.9.3 Additional Factor 3: Part time workers

- a) **How are these groups/factors reflected in the County/District/ Borough?**

Hours worked in 2011 – East Sussex and District (Percentage)

	East Sussex	Eastbourne	Hastings	Lewes
In full-time employment	67.3	67.8	67.7	66.8
Worked 31-48 hours	53.3	56	56.1	53.3
Worked 49 or more hours	14	11.9	11.6	13.5
In part-time employment	32.7	32.2	32.3	33.2
Worked 15 hours or less	11.2	10.7	9.7	11.4
Worked 16-30 hours	21.5	21.5	22.6	21.8

Source: Census 2011, East Sussex in Figures

- b) **How is this group/factor reflected in the population of those impacted by the proposal, project or service?**

No information about employment or part time workers is collected in connection with the parking schemes.

- c) **Will people within these groups or affected by these factors be more affected by the proposal, project or service than those in the general population who are not in those groups or affected by these factors?**

No. The impact will be no different to part time workers than other employment statuses.

- d) **What is the proposal, project or service’s impact on the factor or identified group?**

As above.

- e) **What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

N/A

- f) **Provide details of the mitigation.**

N/A

g) How will any mitigation measures be monitored

N/A

4.9.4 Additional Factor 4: Rurality

a) How are these groups/factors reflected in the County/District/ Borough?

Population by urban and rural areas in 2011 – East Sussex and District (Percentage)

	Urban	Rural
East Sussex	74	26
Eastbourne	100	0
Hastings	100	0
Lewes	77.1	22.9

Source: Census 2011, East Sussex in Figures

b) How is this group/factor reflected in the population of those impacted by the proposal, project or service?

The areas of the parking scheme where charges apply are all in urban areas. 26% of the county's population live in rural areas and may access urban areas for leisure, work or visiting family and friends.

c) Will people within these groups or affected by these factors be more affected by the proposal, project or service than those in the general population who are not in those groups or affected by these factors?

People from rural areas who travel to urban areas may be more impacted as they would more likely have to drive, whereas people in urban areas may be able to walk or use public transport.

d) What is the proposal, project or service's impact on the factor or identified group?

They may not visit urban areas as often and may combine trips to a town centre with other another purpose, for example work or visiting family.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

We will give people notice of the increase in charges. Free bus travel will remain available for those eligible.

f) Provide details of the mitigation.

N/A

g) How will any mitigation measures be monitored?

N/A

4.10 Human rights - Human rights place all public authorities – under an obligation to treat you with fairness, equality, dignity, respect and autonomy.

Please look at the table below to consider if your proposal, project or service may potentially interfere with a human right.

Articles	
A2	Right to life (e.g. pain relief, suicide prevention)
A3	Prohibition of torture, inhuman or degrading treatment (service users unable to consent, dignity of living circumstances)
A4	Prohibition of slavery and forced labour (e.g. safeguarding vulnerable adults)
A5	Right to liberty and security (financial abuse)
A6 & 7	Rights to a fair trial; and no punishment without law (e.g. staff tribunals)
A8	Right to respect for private and family life, home and correspondence (e.g. confidentiality, access to family)
A9	Freedom of thought, conscience and religion (e.g. sacred space, culturally appropriate approaches)
A10	Freedom of expression (whistle-blowing policies)
A11	Freedom of assembly and association (e.g. recognition of trade unions)
A12	Right to marry and found a family (e.g. fertility, pregnancy)
Protocols	
P1.A1	Protection of property (service users property/belongings)
P1.A2	Right to education (e.g. access to learning, accessible information)
P1.A3	Right to free elections (Elected Members)

Part 5 – Conclusions and recommendations for decision makers

5.1 Summarise how this proposal/policy/strategy will show due regard for the three aims of the general duty across all the protected characteristics and ESCC additional groups.

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010;
- Advance equality of opportunity between people from different groups
- Foster good relations between people from different groups

The EqIA has considered the impact of the proposals on different groups. ESCC considers that by delivering these proposals and with the general provisions of the parking schemes as a whole, we are meeting our statutory duties under the Traffic Management Act, Local Transport Plan, the Equalities Act 2010 and our commitment to improve the environment.

The proposals have been developed to avoid a disproportionate impact on current users while helping to continue meeting the costs of the parking schemes. The proposed changes to on street parking charges (including permits) do not alter the nature of the provisions of the parking service.

5.2 Impact assessment outcome Based on the analysis of the impact in part four mark below ('X') with a summary of your recommendation.

X	Outcome of impact assessment	Please explain your answer fully.
	A No major change – Your analysis demonstrates that the policy/strategy is robust and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups.	Our proposals are based on a thorough service review which has outlined where and how the parking charges can be adjusted to best meet the requirement for the scheme to self-financing, whilst continuing to meet the statutory duty to provide CPE schemes.
	B Adjust the policy/strategy – This involves taking steps to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential effect.	This EqIA has identified the groups most likely to be impacted as a result of the proposals and measures that could be put in place to reduce the negative impact on these groups.
x	C Continue the policy/strategy - This means adopting your proposals, despite any adverse effect or missed opportunities to advance equality, provided you have satisfied yourself that it does not unlawfully discriminate	We are satisfied that there is no unlawful discrimination as a result of the proposals and therefore no further changes are required as a result of this EqIA.
	D Stop and remove the policy/strategy – If there are adverse effects that are not justified and cannot be mitigated, you will want to consider stopping the policy/strategy altogether. If a policy/strategy shows unlawful discrimination it <i>must</i> be removed or changed.	

5.3 What equality monitoring, evaluation, review systems have been set up to carry out regular checks on the effects of the proposal, project or service?

The parking team will monitor the impact of the proposed changes through the sale of parking permits and on street parking sessions and customer satisfaction surveys.

Equality Impact Assessment

In addition, complaints arising from the proposed changes will be kept under review for a period of 12 months. The results of complaints and customer satisfaction surveys will be used to monitor whether there is any evidence of adverse impact of the changes on service users.

5.4 When will the amended proposal, proposal, project or service be reviewed? One year after implementation.

Date completed:	10/10/2019	Signed by (person completing)	Richard Plant
		Role of person completing	Consultant
Date:	10/10/2019	Signed by (Manager)	Dan Clarke

Part 6 – Equality impact assessment action plan

If this will be filled in at a later date when proposals have been decided please tick here and fill in the summary report.

The table below should be completed using the information from the equality impact assessment to produce an action plan for the implementation of the proposals to:

1. Lower the negative impact, and/or
2. Ensure that the negative impact is legal under anti-discriminatory law, and/or
3. Provide an opportunity to promote equality, equal opportunity and improve relations within equality target groups, i.e. increase the positive impact
4. **If no actions fill in separate summary sheet.**

Please ensure that you update your service/business plan within the equality objectives/targets and actions identified below:

Area for improvement	Changes proposed	Lead Manager	Timescale	Resource implications	Where incorporated/flagged? (e.g. business plan/strategic plan/steering group/DMT)

Accepted Risk

From your analysis please identify any risks not addressed giving reasons and how this has been highlighted within your Directorate:

Area of Risk	Type of Risk? (Legal, Moral, Financial)	Can this be addressed at a later date? (e.g. next financial year/through a business case)	Where flagged? (e.g. business plan/strategic plan/steering group/DMT)	Lead Manager	Date resolved (if applicable)

Report to: Lead Member for Transport and Environment

Date of meeting: 20 January 2020

By: Director of Communities, Economy and Transport

Title: Countryside Access Strategic Commissioning Strategy: Future Management of Countryside Sites

Purpose: To seek approval for the disposal of four countryside sites.

RECOMMENDATIONS: Lead Member is recommended to approve the following disposals and delegate authority to the Director of Communities, Economy and Transport to complete the necessary agreements:

- (1) The transfer of the freehold of Seven Sisters Country Park to the South Downs National Park Authority (SDNPA);
 - (2) The disposal of Ditchling Common Country Park to the Sussex Wildlife Trust for a peppercorn rent through a long lease with the s. 106 funds for the Ditchling Common Management Contribution (c £400k) also transferred;
 - (3) The transfer of the freehold of Ouse Estuary Nature Reserve to Newhaven Town Council;
 - (4) The disposal of Riverside Park by way of a lease to Newhaven Town Council, noting that a former decision dated 19 March 2013 relating to the transfer of the Riverside Newhaven site was aborted; and
 - (5) Authorise the Director of Communities, Economy and Transport to approve the final terms for the above 4 disposals.
-

1 Background Information

- 1.1. In June 2017, Cabinet approved the Countryside Access Strategy which proposed that eight of the ten countryside sites owned and/or managed by East Sussex County Council (ESCC) would be considered for disposal to suitable external organisations.
- 1.2. The eight sites considered for transfer include: (1) land at Broomhill and Camber Sands, (2) the management of Chailey Common Local Nature Reserve, (3) Ditchling Common Country Park, (4) Ouse Estuary Nature Reserve, Newhaven, (5) land at Riverside Park, Newhaven, (6) Seven Sisters Country Park (SSCP), (7) the part of Shinewater Park in Eastbourne owned by ESCC and (8) the management of Weir Wood Local Nature Reserve.
- 1.3. Cabinet agreed in June 2017 for discussions with external organisations in relation to these countryside sites to continue and delegated the implementation stage of the Strategy to the Lead Member for Transport and Environment.
- 1.4. In June 2019, the Lead Member for Transport and Environment approved:
 - the publication of public notices advertising the intention of the County Council to transfer up to five of these sites (land at Broomhill and Camber Sands, Ditchling Common Country Park, Ouse Estuary Nature Reserve, Riverside Park and Seven Sisters Country Park) subject to agreement of the terms of transfer with the organisations highlighted in the June 2019 report;

- the award of preferred bidder status to South Downs National Park Authority (SDNPA) with a view to transfer the freehold of Seven Sisters Country Park, and;
- the publication of a public notice informing the public of the intention of the County Council to transfer Seven Sisters Country Park and to agree the terms of any transfer.

2. Supporting Information

2.1 Public Notices

2.1.1 Public notices relating to the proposed disposal of public open space land were published in local newspapers for two consecutive weeks as required under Section 123 (2a) of the Local Government Act 1972. The outcomes of these were

- No responses or objections were received to the proposed transfer of Seven Sisters Country Park;
- A total of 31 responses were received to the public notice for Ditchling Common Country Park, 21 of which were objections. These were generated principally through an erroneous rumour on social media that the County Council intended to sell Ditchling Common for housing. All objections were replied to with a clarification and 88% responded by withdrawing their objection, while the remainder either could not be contacted (2 persons) or failed to respond to the clarification (1 person);
- No responses or objections were received to the proposed transfer of Ouse Estuary Nature Reserve and lease of Riverside Park.

2.2 Transfer of Countryside Sites

2.2.1 Terms have been negotiated, in principle, for the transfer or lease of four of the countryside sites.

Seven Sisters Country Park

2.2.2 The SDNPA has submitted a final offer to the County Council outlining a number of commitments including:

- Immediate Phase 1 capital investment of £1.4 million to improve visitor facilities at Exceat with ambition for investment of over £10 million in the coming years to create a world class visitor centre with a focus on climate change and a climate change study centre for farm management;
- Potential to develop a Joint Venture with ESCC Buzz Active at the Country Park;
- A guarantee of no increase in parking charges for three years;
- An annual payment of £35,000 indexed to RPI for 25 years to ESCC;
- To work with ESCC and interested partners on future management options for Chailey Common.

2.2.3 The SDPNA have also outlined how they intend to make further improvements to the Park to significantly improve the visitor experience subsequent to the initial £1.4 million investment. The SDNPA ambition is currently for a further £13m, but this will be dependent on successful bids for funding including an ongoing application to the National Lottery Heritage Fund.

2.2.4 The terms of the transfer of Seven Sisters Country Park as shown in Plan 1 have been negotiated and agreed in principle and include:

- Transfer of the freehold subject to (a) agreement for the leaseback of the Canoe Barn to ESCC for use by Buzz Active or similar arrangement and (b) reservation of land in Brooks Meadow for the construction of Exceat bridge (see Plan 1);
- Completion of a voluntary land access dedication under S16 of the CROW Act 2000 that would provide the permanent right of public access to land at the Country Park;

- A clause providing ESCC with (a) the requirement that ESCC be asked for their approval for the disposal of any land or property at Seven Sisters Country Park and (b) the option to acquire for £1 any asset which the SDNPA seek to transfer, dispose or gift from within the Country Park;
- ESCC elected Member representation on the Board of any operating company.

2.2.5 These terms are subject to consent from the Secretary of State in relation to a transfer of the Country Park. This application has been drafted and will be submitted subject to the approval of the Lead Member for Transport and Environment for the transfer of the site.

2.2.6 Further work in relation to the transfer of Seven Sisters Country Park will include agreement of terms for the Canoe Barn leaseback, or another arrangement that will enable BuzzActive to operate on the River Cuckmere in light of recent flooding. This leaseback arrangement is also subject to clearance by HMRC (see 3.2).

2.2.7 If approved, it is anticipated that the transfer can be completed with SDNPA planning Phase 1 renovations in the winter of 2020/21.

Ditchling Common Country Park

2.2.8 The terms of the lease of Ditchling Common Country Park as shown in Plan 2 to Sussex Wildlife Trust (SWT) have been negotiated and this will be subject to final approval by the SWT trustees in early 2020. The terms include:

- The letting of the site on a long leasehold basis at a peppercorn rent;
- The permitted use would be as a country park and the site will be managed to deliver the ESCC Countryside Access Strategy;
- SWT to take responsibility for all assets such as fences, car park and barriers;
- Transfer of the remaining term of the 2013-2023 Higher Level Stewardship agreement;
- An agreement to ensure public access is guaranteed at the site;
- ESCC and SWT will prepare a transitional handover plan to ensure continuity.

2.2.9 Land at the main entrance to St Georges Park is part adopted highway, and part ESCC owned, but has been managed by the proprietors of St Georges Park (The Trustees Of The Charity The Order Of St Augustine Of The Mercy Of Jesus) for many years. The proposal going forward is to formalise this arrangement and to offer to transfer land parcels whether by sale, long lease or management agreement to the owners of St Georges Park. This will be taken into account with the long leasehold proposal to the SWT.

2.2.10 In addition, ESCC will enter an agreement with SWT for the use of the S106 Ditchling Common Management Contribution fund of about £400,000 held by the County Council. These funds form part of the S106 agreement associated with the Kingsway housing development in Burgess Hill, which borders the country park. The funds are for improvements in the management of Ditchling Common Country Park and mitigation of the impacts of the housing development on Ditchling Common Country Park given its designation as a Site of Special Scientific Interest (SSSI).

Ouse Estuary Nature Reserve, Newhaven

2.2.11 The transfer of the freehold of Ouse Estuary Nature Reserve as shown in Plan 3 to Newhaven Town Council (NTC) was approved by The Town Council in July 2019. Since then the terms have been agreed as follows:

- The site will be managed as a Nature Reserve as part of the Tide Mills Local Wildlife Site in accordance with Ouse Estuary Nature Reserve Management Plan 2013-2023;
- Transfer of 20 Basic Payment Scheme (BPS) entitlements from ESCC to NTC;

- Transfer of the remaining term of the 2013-2023 Higher Level Stewardship agreement;
- Transfer of other agreements associated with the site such as those relating to Great Crested Newt mitigation and compensation at local development sites.

Riverside Park, Newhaven

2.2.12 The disposal of Riverside Park, a former landfill site, as shown in Plan 4 to Newhaven Town Council will be on a leasehold basis. The land at the park is part owned by ESCC and part owned by Lewes District Council (LDC). The lease is being coordinated with LDC with a common set of terms agreed for the lease of land from both Local Authorities. These terms include

- Long lease of the site at a peppercorn rent with a break clause;
- The site will be managed in accordance with Riverside Park Management Plan 2016-2025 and additional management plans will be created beyond that.
- There will be restrictions on use in terms of any disturbance of the surface of the land that comprises the former landfill site with consent from ESCC required for any works on former landfill land at the site;
- ESCC will reserve access for the purposes of monitoring and maintaining infrastructure associated with the site's status as a former landfill site.

2.2.13 The Lead Member is asked to note that a former proposal to transfer the land to a private sector company was aborted and thus the formal decision from the Lead Member for Community and Resources dated 19 March 2013 is otherwise rescinded.

Other Sites

2.3 At present there is no suitable organisation prepared to take on the management of **Chailey Common LNR**. Discussions have been had with landowners and others with an interest in the LNR, and the intention is to (a) address some short-term management issues, (b) clarify some long-term management issues such as liability for fencing and (c) complete a revision of the LNR agreement. Discussions will be continued with interested parties for the long-term management of Chailey Common LNR.

2.4 Rother District Council had expressed interest in the ESCC land at **Broomhill and Camber Sands** and discussion are ongoing.

2.5 ESCC will continue to manage its part of **Shinewater Park** in Eastbourne and **Weir Wood LNR** near Forest Row. Discussions will be held with stakeholders in terms of the future management of these sites by the ESCC Countryside service.

3 Financial Issues

3.1. The business case for the transfers and long leases is being realised by the transfer and lease of these four sites and is financially viable for ESCC, a condition for the disposals that is contained in the Countryside Access Strategy approved by Cabinet in June 2017.

3.2 The Stamp Duty Land Tax (SDLT) and VAT tax issues associated with the arrangements have been explored and found not to be an obstacle to the transfers and leases. However, regarding the Seven Sisters Country Park transfer, clearance is currently being obtained from HMRC relating to a possible risk that an Exchange Rule status could be triggered relating to the leaseback of the Canoe Barn to ESCC/BuzzActive. If HMRC's view is that the SDLT Exchange Rules do apply to the lease back of the Canoe Barn this could create a significant SDLT liability for SDNPA as well as ESCC. If HMRC's view is that the SDLT Exchange Rules do apply to the lease back of the Canoe Barn, the SDLT liability would be mitigated by removing the Canoe Barn from the freehold transfer as agreed with SDNPA. The transfers will not significantly affect ESCC VAT partial exemption calculation.

4 Legal Issues

4.1 For the lease of Ditchling Common Country Park to the Sussex Wildlife Trust, the byelaws will need to be amended to enable them to be exempt from the byelaws in terms of their management of the site. This will require consent from the Secretary of State.

5 Risks

5.1 The most significant risk is for the Secretary of State to not consent to the disposal of Seven Sisters Country Park to the SDNPA for less than best consideration. Although we cannot prejudge this, we propose to wait for this consent before executing any site transfers in order to manage the risk of this outcome.

6 Conclusion and Reasons for Recommendations

6.1 Public notices have been issued and terms negotiated, in principle, for the transfer or long lease of four countryside sites as directed by the Lead Member in June 2019 with outcomes that meet the objectives and terms of the ESCC Countryside Access Strategy approved by Cabinet in June 2017.

6.2 Lead Member is recommended to approve the following transfers and long leases and delegate authority to the Director of Communities, Economy and Transport to complete the necessary agreements:

1. The transfer of the freehold of Seven Sisters Country Park to the South Downs National Park Authority (SDNPA);
2. The disposal of Ditchling Common Country Park to the Sussex Wildlife Trust for a peppercorn rent through a long lease with the S106 funds for the Ditchling Common Management Contribution (c £400k) also transferred;
3. The transfer of the freehold of Ouse Estuary Nature Reserve to Newhaven Town Council;
4. The disposal of Riverside Park by way of a lease to Newhaven Town Council, noting that a former decision dated 19 March 2013 relating to the transfer of the Riverside Newhaven site was aborted; and
5. To authorise the Director of Communities, Economy and Transport to approve the final terms for the above 4 disposals.

RUPERT CLUBB

Director of Communities, Economy and Transport

Contact Officer: Nick Mawdsley

Tel. No. 01273 335222

Email: nick.mawdsley@eastsussex.gov.uk

LOCAL MEMBERS

The table below sets out the County Council Members that have the eight countryside sites considered for transfer to another suitable organisation in their electoral division.

<u>Site</u>	<u>Local Councillor</u>
Camber Sand Dunes/Johnson's Field	Cllr Keith Glazier
Chailey Common Local Nature Reserve	Cllr Jim Sheppard
Ditchling Common Country Park	Cllr Sarah Osborne
Ouse Estuary Nature Reserve	Cllr Darren Grover
Riverside Park	Cllr Sarah Osborne
Seven Sisters Country Park	Cllr Stephen Shing
	Cllr Phil Boorman
Shinewater Park	Cllr Alan Shuttleworth
	Cllr Colin Swansborough
Weir Wood Local Nature Reserve	Cllr Roy Galley

Appendices

Appendix 1 – Final Submission from South Downs National Park Authority for the transfer of Seven Sisters Country Park.

Plan 1 – Land at Seven Sisters Country Park to be transferred to the South Downs National Park Authority.

Plan 2 – Land at Ditchling Common Country Park to be transferred to the Sussex Wildlife Trust.

Plan 3 – Land at Ouse Estuary Nature Reserve to be transferred to the Newhaven Town Council.

Plan 4 – Land at Riverside Park to be transferred to the Newhaven Town Council.

BACKGROUND DOCUMENTS

[Lead Member Countryside Access Strategy: progress update](#) – 16 July 2018

[Lead Member Countryside Access Strategy: Future Management of Countryside Sites](#) - 17 June 2019

[Countryside Access Strategy document](#)

Submission from South Downs National Park Authority as Preferred Bidder for the Seven Sisters Country Park

Executive Summary

Managing Seven Sisters Country Park (SSCP) brings with it a heavy responsibility. This is an open space treasured by local people but known worldwide. The very limited visitor study carried out towards the end of the summer of 2019, gave a cross-section of visitors; roughly a third were local people, there for the fresh air, with the remainder made up of a mixture of day and longer-term visitors from across the UK but also North America, Europe, Asia and Australia.

SDNPA's aim is to provide those visitors with a wonderful experience. The landscape does that already, satisfaction rates are extremely high, but we want to take care of the basics so that visitors can get on with enjoying what the countryside has to offer. We will do this by creating a world class visitor centre at Exceat.

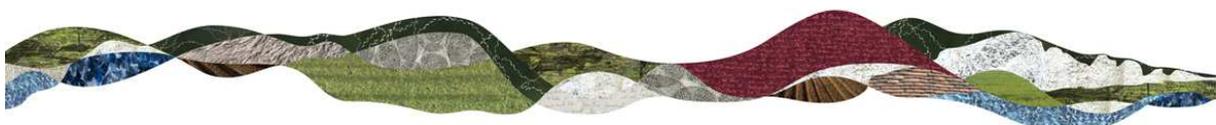
Seven Sisters Country Park is a landscape that is going to be visibly affected by climate change in the relatively short term. This makes it challenging but also valuable for a National Park Authority. SDNPA wants to use the landscape to demonstrate and educate on the effects of climate change but also to study the effects and the best ways of mitigating and managing those effects.

The submission describes the proposal put forward and the commitments made by SDNPA to acquire the country park.

Preparing to take responsibility for the site and preparing for the initial developments is a complex operation and the progress SDNPA has made since being named as preferred bidder is covered for each work stream. SDNPA is working on the detail of the £1.4 million initial investment planned for the first year of ownership, and has teams addressing all of the implications of taking responsibility for the operation of the country park.

The developments proposed for the Country Park are necessarily phased. The first developments will be made within the first year at Exceat and Foxholes and the money for those is already committed.

The second larger phase will follow a funding campaign run by the South Downs National Park Trust and work on that is not likely to begin before 2024. This is much more ambitious and will create a world class visitor centre at Exceat. It is also intended to have facilities there to display the study of climate change in relation to landscape management. The second phase will also involve the refurbishment and bringing back into use New Barn steading as a model farm and climate change study centre for farm management. We will also provide additional accommodation at Foxholes, linked to the study centres.



1) Background

In 2017, when East Sussex County Council first issued a prospectus for a number of countryside sites, SDNPA tasked a Member / Officer working group to look at how the Authority might be involved, particularly with regard to Seven Sisters Country Park, the largest site and wholly within the National Park boundaries.

The Group produced a detailed proposal for SDNPA to acquire SSCP, which was approved by the Authority in May 2019 and agreed as a way forward by ESCC in June 2019.

2) What has SDNPA Committed to do

SDNPA has made a number of commitments in the acquisition proposal of 2018 which led to the award of preferred bidder status. These commitments include:

- To provide capital investment of £1.4 million in the short term, with proposed further investment to follow from various sources, subject to successful funding bids, of £6.6 million over the medium term. The medium term funding ambition has since been upgraded.
- To work in partnership with ESCC on the site, sharing existing contracts and engaging professional services from ESCC where this is possible
- SDNPA would make an offer of a regular payment to ESCC of £35,000 a year, index linked, for 25 years.
- SDNPA will not increase car parking charges at SSCP for a period of three years.
- SDNPA would be prepared to consider an undertaking to ensure that Ditching and Chailey Commons are properly managed in perpetuity through our partnership with Sussex Wildlife Trust, although we would not be prepared to take ownership of these sites.

ESCC placed additional conditions on SDNPA during the process. Those involve

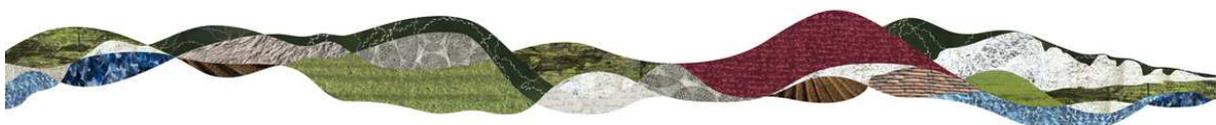
- A clawback clause providing ESCC with right of first refusal if any asset within the Country Park is to be sold by SDNPA
- ESCC elected Member representation on the Board of any operating company.

SDNPA has agreed to those further conditions, and the clawback clause has been refined to state that no sale of any built asset within the country park will be made without the express agreement of ESCC.

3). What SDNPA Proposed

The SDNPA proposal is based on the proposition that the Authority could make;

A significant and visible improvement in the management of the landscape and habitat



SDNPA drew up an outline habitat management plan for each of the habitats within the Country Park, with the aim of restoring chalk grassland through the removal of scrub, cutting and removing regrowth and grazing. We intend to make the area an exemplar for management of wet meadows and grazing marsh. The improved habitats will bring an increase in wildlife on the site which is encompassed in the Seven Species for Seven Sisters vision.

A significant and visible improvement in the experience of visitors to the country park

The improvements to the habitats described above will be itself an added attraction for visitors to the site, who will be able to enjoy the close habitat as well as the stunning views. This experience will be enhanced by interpretation across the country park, which will also include information on the rich cultural heritage of the site. Accommodation to meet a range of budgets will be provided for visitors at Foxholes. The visitor centre will be upgraded and open for longer hours.

Managing the country park, and effecting the improvements without creating an ongoing draw on the SDNPA revenue budget

The third test was set against a backdrop where ESCC are making at best a small return from the site, and where a small and dedicated team of Rangers at the site are already managing the country park to the best of their ability with the resources they have at their disposal.

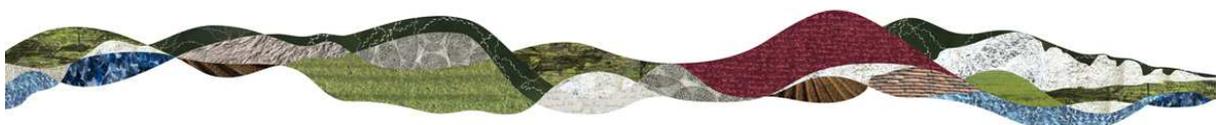
The business case therefore depends on a significant injection of capital funds to upgrade the buildings and bring them back into commercial use. A risk register was developed at this time and a summary is included as Appendix 1.

4). How SDNPA will fund the improvements

Short Term Funding

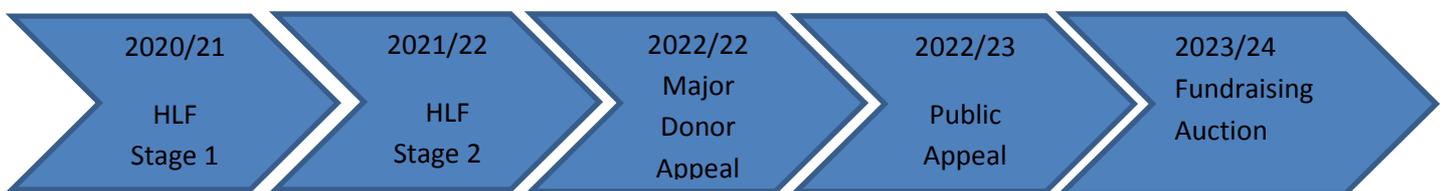
Arrangements are being put in place for SDNPA to borrow £1.4million in 2020/21 and this will be contained in the capital budget for that year. This will fund the initial Phase 1 refurbishment works within the Country Park. It is estimated that the trading company will require a working capital investment of about £200,000 when it is established in April 2020 and funding will be provided for this from current SDNPA reserves as a loan.

The business plan for SSCP under SDNPA ownership includes development of retail within the visitor centre. As well as adding to the visitor experience, the income from this (up to £1.50 per visitor in similar visitor centres run by other National Parks in the UK) will help to offset the costs of running the centre. SDNPA will also provide accommodation within the Country Park, at Foxholes. This, with the existing parking and rentals on the site, will provide, from year 4/5 onwards, a surplus projected as £150,000 per year, allowing SDNPA to invest in the landscape and also to service any future borrowing of capital funds



A strategy for funding the second phase of work at Seven Sisters Country Park is already underway and SDNPA have submitted an expression of interest to the National Lottery Heritage Fund, aiming to submit a bid for an £8 million grant towards a £13 million project within SSCP. This builds on SDNPA’s initial commitment to seek additional investment in the medium term, and would allow SDNPA to fulfil all of their ambitions for the country park in a single phase. The grant, whether this one or another, when awarded will form the foundation for a funding campaign which will the South Downs National Park Trust has agreed to launch. This will be supported by further borrowing by SDNPA to provide the balance necessary. Should the grant funding come in smaller packages, then SDNPA would look to complete the work in more than one phase.

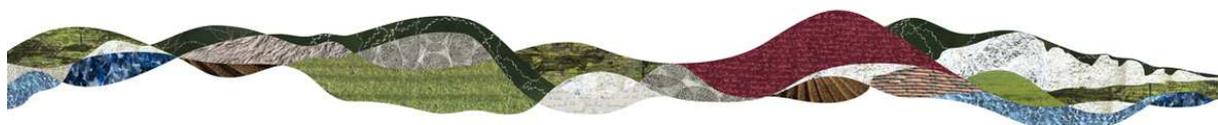
The timeline for the funding of phase 2 is as follows;



5). Ambitions for SSCP and phasing of improvements

SDNPA’s ambitions for SSCP is for it to become “an outstanding place for nature and people where we work with the landscape and communities to demonstrate how to adapt to climate change.”

Phase	Timeline	Outcome
One	May '20 to May '21	Exceat Visitor Centre refurbished with new interpretation and signage, extended toilet facilities and food outlets, craft workshops and children’s woodland play area.
		Foxhole cottages and camping barn refurbished, public camping established.
Two	May '21 to May '25	Habitat improvements on-site, public transport offering improved, Country Park integration, fundraising and major donor campaign underway
Three	May '25 onwards	Further construction work at Exceat to complete world class visitor and climate change(landscape management) study centre. This will include a southern entrance under the main road, linking the visitor centre to the main country park.
		Construction work at New Barn to restore model farm steading with climate change (farming practices) study centre



6). What SDNPA will do in the first year of ownership

- **For visitors**

Finding out about Seven Sisters Country Park

We will create an online gateway to Seven Sisters Country Park that will enable visitors to plan their visit and learn about the Country Park before they travel. Park Rangers will update information on what is happening in the Country Park and what visitors can do and see at different times of year.

Arriving at Seven Sisters Country Park

Visitors will be encouraged to use public transport where possible and SDNPA will work with the bus companies to ensure this an easy and cost-effective experience. There will be clear signage directing visitors to the Country Park.

The Visitor Centre

The visitor centre will be upgraded to provide engaging interpretation for visitors, and it will be staffed 364 days a year to provide information and advice. The visitor centre will include a range of sustainably sourced goods, including those produced by local crafts people. Staff and volunteers will be on hand to provide information and advice on the country park and the surrounding area.

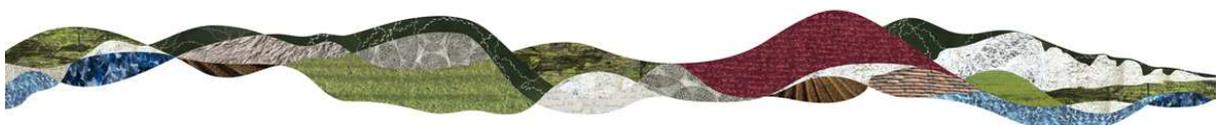
Visitors will have a choice of a range of locally sourced food, in what will be a plastic free environment. There will be new and extended toilet facilities on site, specified to cope with peak demand, and there will be new facilities for visitors, including a woodland play area for children.

Around the Park

Longer-term plans include the use of subtle or invisible interpretation across the Country Park to enable visitors to get the most from their visit. There is a clear aim to provide an integrated experience for visitors, between the visitor centre and the main part of the country park and between the different organisations who operate there. Everybody who works or trades in the Country Park will be expected to be identified with the Country Park and to be an ambassador for it.

Accommodation

Visitors will be able to extend their stay within the country park by taking advantage of a range of accommodation all situated around Foxholes. We will in the early part of the project, clear the existing pond and restore the pastoral landscape. Public camping will be available in front of the camping barn at low cost. The camping barn itself will be turned into a bunkhouse, with sleeping and cooking facilities for individuals and family groups. There will be a warden within the site. The



three cottages will be holiday lets and will be specified to provide four-star accommodation. A high degree of sustainability will be built in, with the cottages being essentially off-grid, and with outdoor space behind each one to encourage holidaymakers to get outdoors. This will also be reflected in the operation, with Foxholes being run as a car free zone; visitors will leave their cars at Exceat and be transported on their arrival and departure and walking or cycling between times.

Accessibility

Experiencing nature and open spaces is a vital component of physical and mental welfare and it is important that we do everything we can to break down real and perceived barriers to allow as many people as possible to benefit from nature's assets. Seven Sisters is already one of the more accessible countryside sites on the south coast, well served by public transport and with a level concrete path into the Country Park. SDNPA will add to this, with a fully accessible visitor centre and including 'changing places' toilet facilities, and staff on-hand to assist and guide visitors to the Country Park. Our Rangers will carry out work to open up more of the site to people of mixed abilities and will run guided tours within the Country Park.

We want to encourage local communities to visit the country park and take part in activities within the park, whether that is simply walking or whether it involves getting on a bike or going out in the water. SDNPA will actively market the facilities to local communities by going into schools and to adult groups and bringing people into the Country Park to do the things that interest them. One of the two primary purposes of a National Park Authority is to increase knowledge and understanding of the environment and SSCP represents an ideal gateway to get local people involved.

- **On land management**

Located within the Eastern Downs, the Country Park includes 280ha of land almost entirely of which is SSSI with a diverse range of habitats including chalk grassland, floodplain grazing marsh and a range of other wetland and intertidal habitats, as well as key geological geomorphological features. The site also has significant cultural heritage features from archaeological sites and monuments of Stone Age and Bronze Age to the defence of Britain in the Second World War. It is a recreational space with a mix of open access, permissive access and rights of way including the National Trail: The South Downs Way. It is also a farmed landscape.

SDNPA have started to build an evidence base to inform future land management and are currently commissioning a number of studies (both internal and external) that will allow a detailed management plan to be developed for the site. Once that is completed, work will begin to enhance those habitats. SDNPA see the Country Park as an important centre for the monitoring, management and mitigation of climate change and many of the measures will be built around this, which will also form part of the visitor experience.



Chalk Grassland Management and Restoration

An aspiration for the remaining chalk grassland areas would be to bring them into excellent condition by reversing the invasion of Tor Grass and implementing a targeting grazing regime on those areas to create authentic chalk grassland.



The SDNPA continues to be an active member of the Cuckmere Estuary Group – involving key agencies, landowners as well as local community representation. In managing the Country Park we would work closely with local partners (including Sussex Heritage Coast Partnership, Friends of the Cuckmere and the Cuckmere and Pevensey WLMB) and develop an adaptive approach to management so as to maintain it as a haven for people and wildlife.

The Cuckmere Estuary is part of a dynamic coastline and wider River Cuckmere Catchment which is already being influenced by climate change now and which will continue into the future. This could see a rise in sea levels and also more intense rain events which may result in both coastal and fluvial flooding, but also periods of drought.

SDNPA's approach therefore will be to manage the landscape in a way that enables it to absorb the effects of climate change in a manner that enhances rather than depletes wildlife habitats and natural diversity.

7). Progress SDNPA has made since June 2019 to date (November 2019)

Project Governance

SDNPA have appointed a Project Board to oversee the SSCP transition, comprising a number of Members, the Senior Management Team and a representative from the South Downs National Park Trust (SDNPT). A Project Manager has been appointed to lead a team in several work streams and a Project Delivery Plan covering the project to phase one completion has been approved. The project governance is following the Prince II project management methodology.



Five main work streams have been established within the project team to take forward the necessary work;

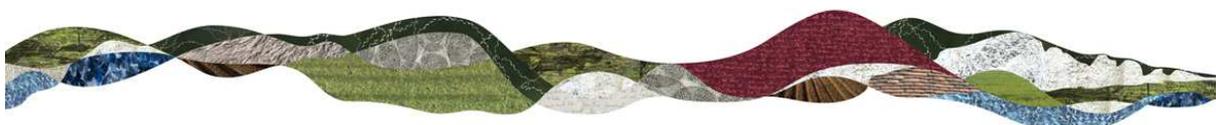
a). Infrastructure / Development

This work stream is responsible for delivering the work covered by the initial investment of £1.4million of SDNPA funding within the Country Park. This has been initially allocated as follows for phase 1 ;

Location	Outcome	Estimated Cost
<u>Exceat</u>		
Visitor Centre	Refurbishment and interpretation	£70,000
Workshops & Dairy Barn	Provision of new public toilets and craft workshops	£235,000
Existing toilet block	Provision of 'Grab & Go' food outlet	£150,000
Woodland Area	Children's Woodland Play Area	£80,000
<u>Foxholes</u>		
Cottages (3)	Refurbishment to provide holiday accom.	£450,000
Camping Barn	Conversion to bunkhouse	£50,000
	Contingency and possible stabilisation at New Barn	£300,000

The ambition to have this work completed and ready for the beginning of the summer season in 2021 means that this work stream is already time critical. Therefore SDNPA has already allocated £50k of funds and commissioned a number of surveys. The main Architect for phase 1 has been appointed and whilst it is too early in the process to share the outcomes of this work, we are expecting the initial drawings by early February

Our ICT supplier has obtained indicative quotations to bring fibre broadband to Exceat and we are currently looking at options to extend this to Foxholes, the Canoe Barn, and eventually New Barn.



b). Visitor Experience

A visitor study has been conducted within the Country Park in late summer to gain the views of a range of different types of visitors to the site. A summary of the results is included as Appendix 2. A contractor is now in place to develop the visitor signage and interpretation works, both at Exceat and in the wider landscape.

Plans are underway to develop a separate micro-site on the web for SSCP and to begin talks with public transport providers to promote the Country Park on their vehicles.

c). Landscape

Within this work stream, SDNPA have worked with ESCC to complete the open access arrangements for the country park and we are beginning talks with the tenant farmer on the site about an extension to the farm tenancy while the wider landscape strategy is developed. Consultants are being commissioned to provide additional capacity to the SDNPA team to develop the landscape strategy for the site.

d). Human Resources

SDNPA have a staffing structure in place for the opening of the Country Park and have job descriptions and a recruitment strategy in place.

ESCC staff subject to TUPE transfer to SDNPA have a place within the staffing structure. All staff transferred will be employed by SDNPA and be seconded to the trading company. All terms and conditions, including pension rights, will be protected under the transfer.



The Park Manager will be responsible primarily for all aspects of the visitor experience within the country park. It is expected that while different staff will have their own specialisms and specific duties, they will work flexibly and be prepared to plug gaps in the delivery whenever those appear.



The role of volunteers in the Country Park is crucial to the visitor experience and SDNPA will be providing a full welcome and induction package for all existing volunteers on the site and will aim to recruit additional volunteers from the surrounding settlements. A number of different volunteer roles have already been identified, including within the visitor centre, more general greeting and guiding of visitors and working on the landscape.

e). Legal and Governance

There are several issues with the transfer that may affect VAT and Land Tax that are being resolved with assistance from our tax advisors. The main remaining issue is around the transfer and immediate lease back of the canoe barn and we are expecting to require a note of assurance from HMRC on the position regarding this.

A trading company is being established to manage the commercial operations within Seven Sisters Country Park. This is proposed to be a company limited by shareholding and will be wholly owned by SDNPA. The company will be responsible operationally to a new Seven Sisters Country Park Board, through a detailed Service Level Agreement. The membership of the Board will include a number of SDNPA members and a representative from East Sussex County Council.

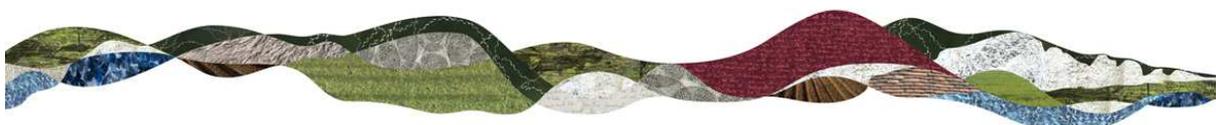
Other Discussions

Buzz Active – SDNPA and ESCC have had initial discussions regarding the Buzz Active operations at the Canoe Barn in particular but also the other locations they are operating from. We see the work that Buzz Active do at Seven Sisters as being integral to the Country Park and wish to support the operation as much as we can. We plan further discussions on the following options;

- A joint enterprise adjacent to the riverside car park
- Integrated visitor packages with accommodation
- Provision of high-speed broadband from the Exceat steading
- Assistance and involvement in any future business model

Granary Barn – SDNPA also see cycle hire as being integral to the visitor offer to the Country Park and we are committed to seeing a business providing this from the Granary Barn. If this does not happen within the existing tenancy we will seek to recover the leasehold and support a business to run cycle hire from the site. Discussions are scheduled with the receiver and the receiver's solicitor to progress this.

Chailey and Ditchling Commons – The Chief Executive of SDNPA is in monthly meetings with Sussex Wildlife Trust, which oversees progress on these sites. SDNPA stands ready to support and facilitate the transfer of responsibility for managing those sites as required.



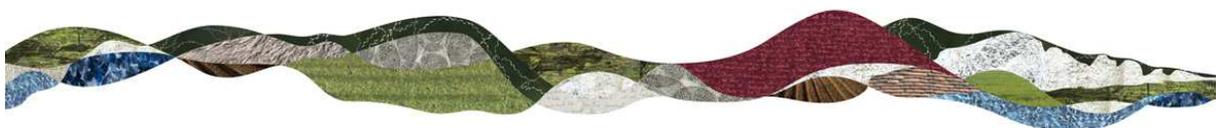
8). What SDNPA plan to do in the longer term

Exceat Steading

A major capital investment will allow the steading to be refurbished and added to, without losing the essential character of the buildings but by providing more usable space, to hold a world class visitor centre, with a southern entrance directly into the Country Park, underneath the road. Adjacent to the visitor centre there will be a Centre for Climate Change Study. This will hold education and research facilities into the impact of climate change on the landscape of the country park and the heritage coast as well as the effectiveness of mitigation in landscape management.

New Barn Steading

Major capital investment will again allow the steading to be completely refurbished to provide a model farm, with the necessary barns and pens, but also with a further climate change study centre, in this case featuring the impacts on farming and examining the effectiveness (triated on the site) of mitigation methodologies.



Appendix 1 Risk Register

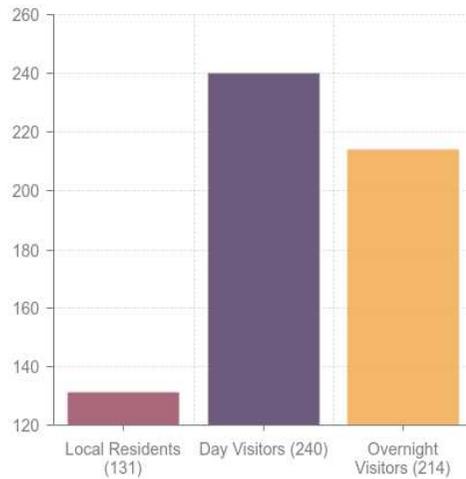
Risk Number	Details of Risk		Inherent Risk			Mitigations	Residual risk		
	original date	Risk Description	Probability	Impact	Rating		Probability	Impact	Rating
I		Delays to upgrading work within the Country Park affect cash flow and have an adverse impact on SDNPA reputation	3	3	9	Realistic programme of works formulated at outset. Sufficient time for design, commissioning and works to be allowed. Traditional contracting process aimed at risk reduction. Active contract management to ensure delivery is achieved.	2	3	6
		Cost overrun on upgrading work impacts on capital investment required and ROI.	3	3	9	Robust estimates provided by specialist consultants before work commences. Sharing of risk and reward with contractors. Active cost control during contract with value engineering if necessary. Adequate contingency allowed.	2	2	4
		Reduction in visitor numbers due to economic factors; strong pound, weak global economy, increased travel costs, change in visitor preferences.	3	3	9	Increased marketing of site to offset reductions, monitor visitor satisfaction to ensure site facilities are meeting needs, keep attractions fresh and relevant to visitors.	2	3	6
		Increase in visitor numbers causes congestion on site, reducing attractiveness of experience and has negative impact on surrounding area and infrastructure.	4	4	16	SDNPA would not want to be ever discouraging visitors to the National Park. However, options to encourage visitors to SSCP to visit other attractions within NP, provide information on when quiet times are to visit, introduce offers on public transport / provide transport from nearby train stations to reduce visitor impact, increase capacity and improve visitor management within SSCP.	3	2	5
		SDNPA fail to negotiate removal of restriction from Saltmarsh lease to allow catering on site.	3	4	12	SDNPA can put forward package that is attractive to Saltmarsh café and will benefit both parties. Option to allow lessee to operate catering within VC at commercial rates.	2	4	8



SSCP Visitor Survey Results

585 people interviewed in July, August and September 2019 across 4 locations in SSCP

Visitor Breakdown



89%

had no mental or physical health problem/disability which lasted longer than 12 months

90% of visitors were aware they were in a National Park (97% local resident)



65% travelled by private motor vehicle (local residents mostly to use private vehicle)

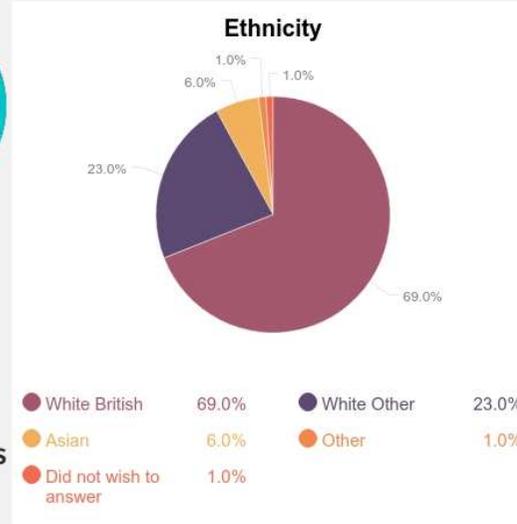


25% travelled by public bus service (overnight visitors most likely to travel by bus)



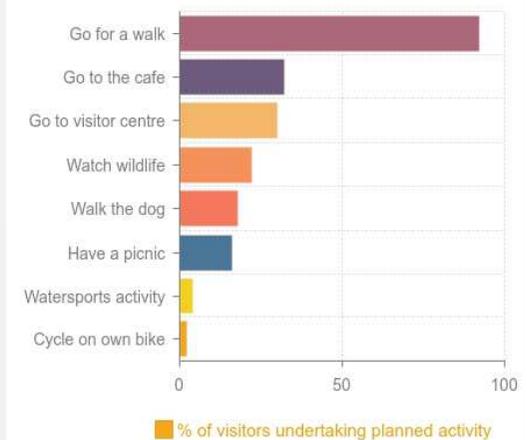
of all visitors were in adult only groups.

10% of visitors were under 16yrs



Of the Asian visitors 10% were day visitors and 4% were overnight visitors

Planned on-site activities



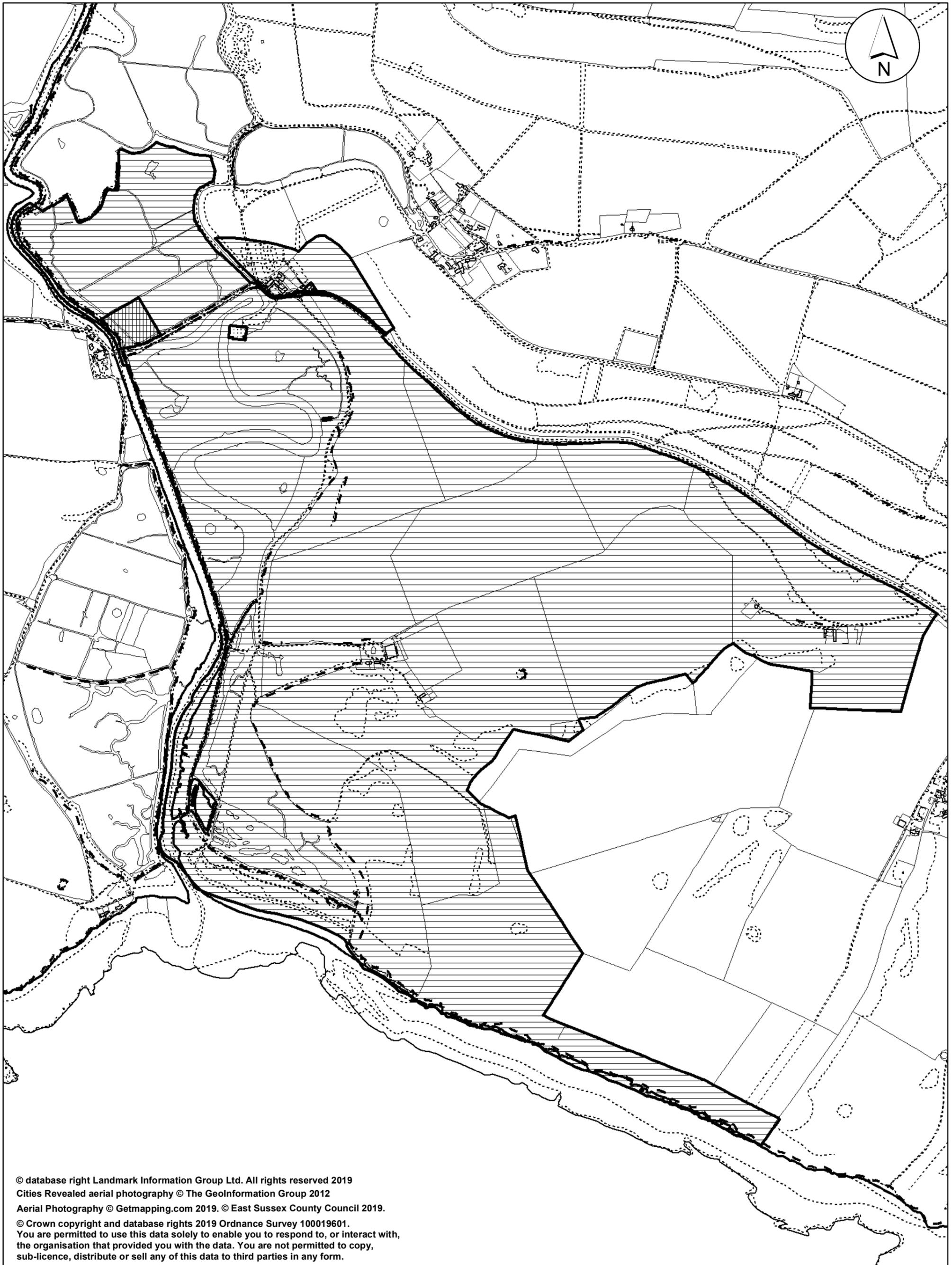
Overnight visitors nearly 4 times more likely to visit the cafe and 5 times more likely to go to the visitor centre than a local resident

96%

Overnight visitors of the overnight visitors were from the UK, 4% were overseas. The majority of these visitors were staying in Eastbourne, Brighton and Alfriston



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Seven Sisters Country Park LM Plan

Scale: 1:10,000

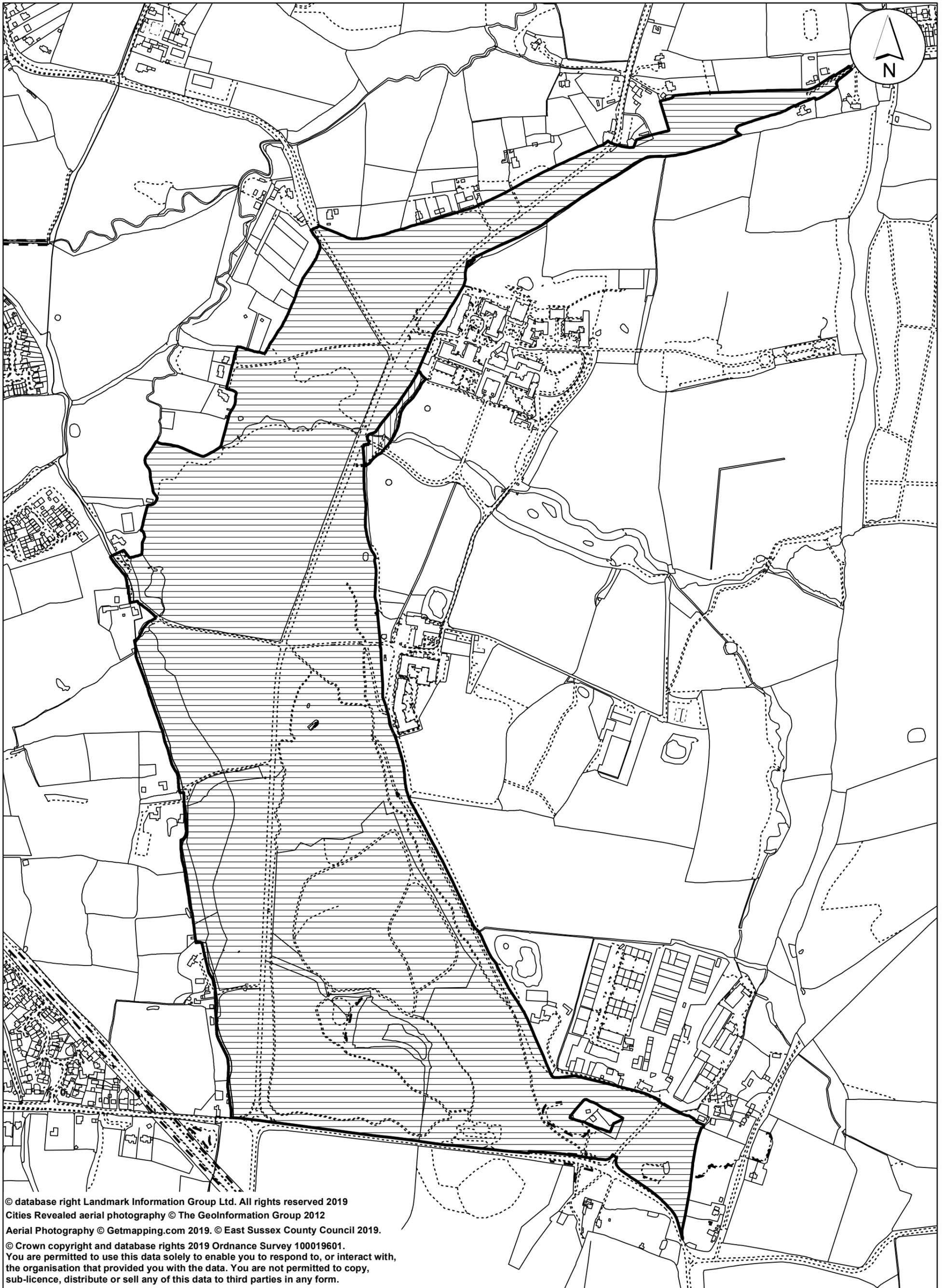
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Ditchling Common LM Plan

Author: GG/RP

Scale: 1:6,000

Date: 13/12/2019

East Sussex County Council
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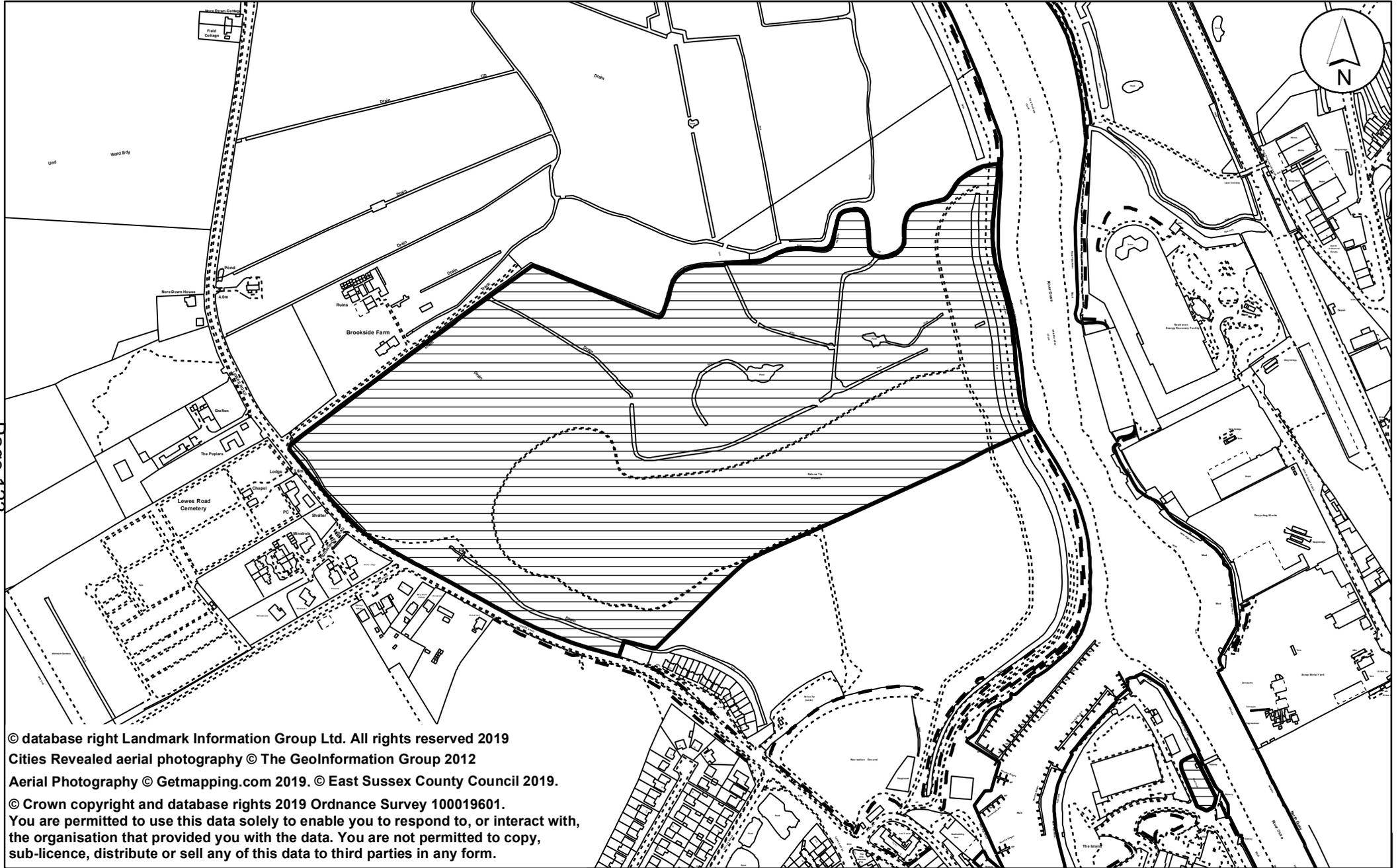


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<p>Ouse Estuary, Newhaven</p>	<p>Scale: 1:5,000</p>	
<p>Author: GG/RP</p>	<p>Date: 13/12/2019</p>	

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Riverside Park, Newhaven

Author: GG/RP

Scale: 1:5,000

Date: 12/12/2019



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