

Firle Estate Car Parks
Supplementary Planning Statement
SDNP/22/03264/FUL Car Parking Charging Equipment Firle Beacon Car Park

Introduction

This Supplementary Planning Statement is prepared in support of applications for planning permission and advertisement consent for car park related infrastructure at the Beacon Car Park, Firle. It is prepared in response to issues raised by the planning authority in respect of the initial application submission.

The Application

Initial Parking Ltd lodged applications for “installation of pay machines, solar panels, CCTV and associated infrastructure” at Firle Beacon Car Park, South Downs Way, Lewes, BN8 6LR. The planning application is registered under reference SDNP/22/03264/FUL.

The Issues

This supplementary paper addresses three issues that have emerged following submission of the application. The issues are as follows:

1. incorporation of microgeneration technologies;
2. need for ANPR/CCTV system; and
3. planning benefits.

This paper addresses each of these issues in turn.

Microgeneration

The initial submission included a proposal to install sufficient photovoltaic panels to provide the necessary backup power to support the individual terminals. Each of the latter has a modest top-mounted photovoltaic panel sufficient to supply most of its power needs (operational and mechanical), including GSM connectivity, in normal operating conditions. However, backup power is needed in particular weather conditions and periods of high usage, and to support the ANPR and CCTV systems.

The planning authority has indicated concern at the impact of the proposed PV panels, and initially indicated that a turbine might provide a more acceptable alternative. However, latterly that alternative has been discouraged.

Although the applicant is keen to utilise renewable energy to support these facilities (and still intends to provide units which are partially solar powered), in practice if neither solar nor wind power is acceptable to the planning authority, a direct power option from mains electricity will need to be introduced. For this reason therefore, the application has been modified to exclude both the standalone solar panels and the associated battery storage in favour of direct power sourcing, which involve the installation of cabling within the public highway from an estate farmstead nearby.

ANPR & CCTV System

The operational feasibility of the proposal depends on the installation of an automatic number plate recognition system (ANPR) to monitor car park use. Such systems are widely employed across UK parking facilities and have a number of benefits. They are particularly useful in locations such as Firlie Beacon, which are remote and difficult to access regularly by parking attendants in order to check that vehicles have been appropriately parked and have paid the relevant fees for their stay. The ANPR camera is fully integrated with the terminals and charging infrastructure.

In addition to delivering operational benefits in this type of location, there are further advantages of the ANPR system, combined with CCTV. In remote locations it provides a useful monitoring and surveillance role in helping to protect vehicle security and indeed that of individuals. These systems are widely used by local police forces in detection of criminal activities, and help provide reassurance for vulnerable users.

The ANPR/CCTV system requires a single pole of a minimum 4m height to protect against vandalism and to ensure operational effectiveness. The ANPR camera must be aligned at the correct angle to read vehicle number plates without being subject to reflective glare. As such, the pole mount is an essential piece of infrastructure. The proposal is to integrate the pole with existing fence post features so that it does not appear as a standalone and isolated feature in the landscape.

We note the comment about the interim approach taken at the Ditchling Beacon Car Park (which does not include ANPR/CCTV technology). However, the context there is very different. Ditchling Road is an important thoroughfare and the car park is immediately adjacent to it. As such, it is one of the busiest areas in terms of footfall along the South Downs. The Beacon Car Park by contrast is at the end of a dead end road, which

serves the car park and agricultural traffic but little else. Whereas at Ditchling, non-compliance may be discouraged by the general level of activity and anticipation of regular warden visits, such dissuading factors do not apply at Beacon Car Park. This means that the incidence of non-compliance is likely to be far higher absent the ANPR/CCTV technology.

The infrastructure, therefore, is not only justified but can be shown to bring other benefits, which when properly weighed against the landscape implications, can be seen to be justified.

Planning benefits

The ANPR/CCTV system will also have the benefit of reducing the incidence of unauthorised overnight wild camping in camper vans and in/from other vehicles. This unregulated activity has the potential to harm visitor enjoyment of Firle Beacon by virtue of littering and sanitation issues. This unauthorised activity and the proliferation of 'wild' campervans has been the source of regular complaints by visitors and local residents and the Firle Estate is eager to find an economic way of 'policing' these remote sites. Importantly, however, recreational vehicles including camper vans will not be discouraged from using the parking facilities. The car park is very well placed to serve recreational use and that is to be supported. However, the operational regime will be established to firmly discourage overnight stays, supported by the ANPR/CCTV system for accountability.

At present camper vans and other recreational vehicles such as horseboxes and horse trailers are unable to access the main parking area because of a steel height barrier restriction feature, in the form of a "goalpost". A number of camper vans and larger vehicles overcome this by parking instead outside the designated parking area on either side of the farm track, which runs southwards from the car park. Uncontrolled access (and overnight parking) is also problematic in this area.

The new arrangements will mean that the steel goalpost height barrier can be removed. It is considered that the goalpost feature is a visually intrusive and discordant feature. The proposed ANPR/CCTV pole mount will enable its removal, thereby helping to enhance the natural beauty of the location.

The applicant acknowledges that the Beacon car park offers direct access to the South Downs Way, and that the needs of recreational users should be supported (in accordance with National Park purposes). Indeed, Initial Parking Ltd is keen to facilitate and support use of the parking facility by camper van and larger recreational vehicle users such as horseboxes and trailers (in accordance with Policy SD22) as well as the current educational visits by mini-bus. The application proposes the removal of the existing height restrictor

to facilitate that, together with the re-alignment of agricultural fencing to prevent verge parking outside the designated car park. In that way, the use of the car park to support recreational, educational and charitable events including school visits, organised marathon running, endurance horse-riding and off-road cycling, will be supported. The existing car park has adequate provision to accommodate the needs of all users.

Initial Parking has reconsidered the approach to be adopted towards signage. The application is now proposing an integrated and bespoke signage arrangement, which combines information about parking tariffs and operational hours with interpretative information about Firle Beacon including, historic, geological and geographical information. The proposal is a single bespoke framed presentation board that gives visitors useful, practical information as well as material that will benefit and enhance their visit. It will feature a landscape panorama interpretation feature to help orientate visitors as well as information about flora and fauna that may be encountered on their visit. The provision and maintenance of the board will be undertaken by the parking operator, with the content to be agreed by condition. An example of what is contemplated by the applicant is presented with these revised application papers.

A separate directional sign to aid visitors on approach to the car park is also proposed. This meets British Parking Association requirements, and is presented in a form redolent of the stained timber signage used by the Forestry Commission on its car parks (nearby examples are at Friston Forest). It also identifies popular walking routes supporting the visitor experience, thereby promoting opportunities for the public understanding and enjoyment of the special qualities of the park.

These benefits (removal of the unsightly height restriction and provision of useful visitor information) are considered to directly relate to the development proposed and is therefore suitable for a planning condition.

Summary

This Supplementary Paper addresses issues raised in connection with the applications for planning and advertisement consent. It explains how the proposal is being amended to remove the proposed microgeneration features in favour of a direct mains connection for backup power following concerns raised by SDNPA officers. It also sets out the rationale and benefits of the ANPR/CCTV system and explains why it is necessary in this particular location, and how the pole-mounted camera will be integrated with fencing. It explains the benefit of that and the revised approach to signage, which is to incorporate practical information about charging and operation times with visitor information, including relating to landscape, geology, flora

and fauna. These are benefits which directly relate to the application proposed and are capable of being secured by condition.