

FAREHAM

BOROUGH COUNCIL

Report to the Executive for Decision 7 September 2015

Portfolio:	Planning and Development
Subject:	Fareham Borough Non-Residential Parking Standards Supplementary Planning Document: for Adoption
Report of:	Director of Planning and Development
Strategy/Policy:	Local Plan: Adopted Core Strategy (August 2011) & Local Plan Part 2: Development Sites and Policies (June 2015) Adopted Version & Local Plan Part 3: Welborne Plan (June 2015) Adopted Version.
Corporate Objective:	Protect and Enhance the Environment Maintain and Extend Prosperity

Purpose:

To approve the revised Fareham Borough Non-Residential Parking Standards Supplementary Planning Document for Adoption.

Executive summary:

This report describes the background and rationale for the production of a revised Fareham Borough Non-Residential Parking Standards Supplementary Planning Document (SPD) for Adoption. The SPD sets out guidance for developers and other interested parties on the levels of parking expected in non-residential developments within the Borough.

The need for new parking standards has arisen due to Hampshire County Council's decision to withdraw its Parking Strategy and Standards (2002), which has previously been used as guidance on parking standards for relevant developments in the Borough.

The Council has used this opportunity to review local experience in the application of these standards and consider current local and national planning policies in order to issue updated guidance that will also apply to major development proposals such as Welborne and Solent Enterprise Zone at Daedalus.

The SPD explains the background to developing the new guidance and includes tables containing the parking standards to be applied for non-residential development in the Borough. This document will complement the guidance for residential developments given in the Residential Car & Cycle Parking Standards SPD (Fareham Local Development Framework) issued by Fareham Borough Council in November 2009.

Recommendations:

- (a) That the Executive notes the consultation comments received on the Draft Fareham Borough Non-Residential Parking Standards Supplementary Parking Document and agreed the proposed Council responses set out in Appendix A.
- (b) That the Executive agrees to adopt the proposed Fareham Borough Non-Residential Parking Standards Supplementary Parking Document as set out in Appendix B.
- (c) That subject to the adoption of new parking non-residential parking standards, the Executive agrees to the revocation of the policy to continue to use the Hampshire County Council Parking Strategy and Standards (2002) as the basis for guidance for an interim period.

Reason:

The Council has used the opportunity afforded by Hampshire County Council's decision to withdraw its Parking Strategy and Standards (2002) to issue new guidance on parking standards for non-residential developments in the Borough, to ensure that development proposals have due regard to the importance of providing appropriate well-designed parking that satisfies the principles of transport sustainability.

Cost of proposals:

There are no direct financial implications arising from this report.

Appendices:

A: Summary of Comments Received and Proposed Council Responses to the Consultation

B: Fareham Borough Non-Residential Parking Standards Supplementary Planning Document (for Adoption)

Background papers: None

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Executive Briefing Paper

Date:	7 September 2015
Subject:	Fareham Borough Non-Residential Parking Standards Supplementary Planning Document: for Adoption
Briefing by:	Director of Planning and Development
Portfolio:	Planning and Development

INTRODUCTION

1. This report describes the background and rationale for the production of a revised Fareham Borough Non-Residential Parking Standards Supplementary Planning Document (for Adoption), setting out guidance for developers and other interested parties on the levels of parking expected in non-residential developments within the Borough.
2. An earlier version of the Supplementary Planning Document (SPD) - Draft for Consultation - was considered by the Planning and Development Planning and Development Policy Development Review Panel at the Meeting on 19 May 2015. Following approval from the Planning and Development PDR Panel a draft SPD was issued for Public Consultation for a period commencing on 26 June 2015 for six weeks until Monday 3 August 2015.
3. The proposed responses to comments received during the Public Consultation have been reflected within the revised version of the SPD document. Comments received during the Consultation period and the proposed Council responses are set out in Appendix A. The revised SPD (for Adoption) document is attached as Appendix B.
4. The requirement to review current non-residential parking standards has arisen as a result of Hampshire County Council's (HCC) decision to withdraw its Parking Strategy and Standards (2002), which had previously been used as guidance on parking standards for relevant developments in the Borough.
5. The Council has used this opportunity to review recent local experiences in the application of these standards and consider current local and national planning policies in order to issue updated guidance that will also apply to major development proposals such as Welborne and Solent Enterprise Zone at Daedalus.
6. The adopted version of this SPD will complement the guidance for residential developments given in the "Residential Car & Cycle Parking Standards Supplementary Planning Document (Fareham Local Development Framework)" issued by Fareham Borough Council in November 2009.

7. At the Planning Committee Meeting on 23 April 2014 it was resolved that until new parking standards can be issued, the HCC Non-Residential Parking Standards would continue to be used as the basis for guidance on developments in the Borough.

SCOPE

8. The Fareham Borough Non-Residential Parking Standards SPD (for Adoption) has been prepared to ensure that all new non-residential development in the Borough has due regard to the importance of providing appropriate, well-designed parking that satisfies the principles of transport sustainability.
9. The SPD represents an important material consideration in the determination of planning applications. It provides further guidance on adopted Policies in the Borough's Local Plan. Once adopted, it will replace the Hampshire Parking Strategy and Standards (2002) document that was withdrawn in April 2014.
10. The provision of parking standards for different land uses is important in influencing travel choices. It is also vital to ensure that otherwise well-planned development does not adversely affect the operation, aesthetic, and safety of, or access to, the highway. This SPD sets out a revised strategy for parking provision in all forms of non-residential development in the Borough including mixed-use developments.
11. The SPD applies to all development sites in the Borough including Welborne and Solent Enterprise Zone at Daedalus. Parking standards are defined for individual use class types, including spatial requirements for cars, cycles, motor-cycles (powered two-wheelers), disabled users and operational parking, loading or unloading.

APPROACH TO THE DERIVATION OF NEW STANDARDS

12. In March 2015 the Government issued a Planning Update which included supplementary guidance on the provision of car parking spaces to that contained in the National Planning Policy Framework (NPPF). In particular, the Planning Update states that *"Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network"*.
13. The evidence available from case studies where parking standards have been applied to non-residential development in the Borough demonstrates conclusively that there is a sound case for providing relevant guidance on the spatial requirements for car and cycle parking. For example, inadequate levels of parking provision have led to over-spillage of parked vehicles on the road network surrounding a development site.
14. Issuing guidance should therefore contribute positively to the planning of developments, and this SPD sets out a revised strategy for parking provision in all forms of non-residential development in the Borough including mixed-use developments.
15. The review of previous planning applications showed that in some cases inappropriate parking provision has led to the under- or over-provision of parking spaces, resulting in various problems as developments have come into use, including the occurrence of overspill parking on the surrounding roads. It was also apparent that the previous standards have been interpreted as either 'maximum' or 'minimum' figures, potentially leading to an inappropriate quantum of parking spaces for the development.
16. It was also realised from the experience of case studies that where parking is a material consideration, it is important to specify a standard that represents the type and location

of development and as far as practicable gives a robust provision over the full life-cycle of the development.

17. There was also the need for a more detailed resolution of Use Classes than that given in the 2002 publication, particularly within the Retail classification, to differentiate between the different types of development proposals across the Borough.
18. A principal conclusion from the review of case studies was that the HCC 2002 maximum parking standards could generally be applied as 'required' figures, with an appropriate reduction in the Town Centre and scope for flexibility as supported by a Transport Assessment or Travel Plan submitted as part of a planning application.
19. The need for flexibility within a defined set of requirements is also seen as critical to ensuring that the guidance included in the SPD document remains applicable in the future commensurate with possible intensification of use and other changes in land use patterns.
20. In certain circumstances planning permission is not required to change between different non-residential uses. In such cases the Council has no control over whether such schemes have adequate parking provided. Therefore, when considering the parking standards for a particular use type, the Council will also need to be mindful of which uses can be permitted without a future planning application.
21. The preparation of the new SPD has also been informed by an assessment of the standards documents issued by other adjoining local authorities. Where new guidance has been issued this is typically based upon the HCC Parking Standards (2002), in some cases retained as maximum standards for motor vehicles, adopted as a single standard across the Borough or District and amended to reflect local experience and following the consultation exercise on the Draft SPD.

LOCAL AND NATIONAL POLICY CONTEXT

22. The relevant policy guidance within the Local Plan is Core Strategy Policy CS17: High Quality Design, which states that development will be designed to: *"Provide appropriate parking for intended uses taking account of the accessibility and context of a development and tackling climate change."*
23. The National Planning Policy Framework (NPPF) sets out Government planning policies that must be taken into account in the preparation of Local Plans and is a material consideration in planning decisions. The revised Parking Standards should be prepared in accordance with the policy context set out in the NPPF.
24. Chapter 4 of the NPPF states that *"All developments which generate significant amounts of movement should be required to provide a Travel Plan"* (Paragraph 36). It also provides guidance on setting parking standards:

"If setting local parking standards for...non-residential development, local planning authorities should take into account:

- *The accessibility of the development;*
- *The type, mix and use of development;*
- *The availability of and opportunities for public transport;*
- *Local car ownership levels; and*
- *An overall need to reduce the use of high-emission vehicles". (Paragraph 39)*

25. Additional guidance in a Planning Update from Government dated March 2015 states that *“Local planning authorities should only impose local parking standards for residential and non-residential development where there is a clear and compelling justification that is necessary to manage their local road network.”*
26. It was concluded from the review of previous planning applications referred to in the paragraphs above that the issuance of guidance on parking standards for non-residential developments would be beneficial in providing developers and project promoters with a consistent framework for bringing forward proposals. The guidance also allows flexibility to modify the recommended figures where necessary to reflect particular local conditions, justified by details submitted in a Transport Assessment or equivalent supporting documentation as part of a planning application.
27. For larger developments it will be necessary to assess the requirements for operational parking space through submission of a Design and Access Statement and/or Management Operations Plan.

Fareham Town Centre

28. The application of parking standards to sites in Fareham Town Centre will need to take account of their distinct characteristics, the specific spatial requirements and viability of the proposed development.
29. In comparative terms this location benefits from the availability of public off-street parking spaces and better access to rail and bus services. It can therefore be expected that these amenities would lead to lower levels of parking demand at individual sites with a consequential reduction in appropriate parking standards for these sites, particularly for retail-related planning applications.
30. This SPD (for Adoption) recommends that where spaces are required, then in certain locations and when appropriate to the development consideration should be given to providing parking areas through the implementation of underground or undercroft solutions.

Other Local and District Centres (excluding Welborne)

31. Although other centres in the Borough are less well-connected in terms of public transport, generally there are off-street parking spaces available and these facilities may provide opportunities for departures from standards in the consideration of parking provision for development site proposals. This would be expected to apply particularly to planning applications related to the retail use class.

Welborne

32. For parking standards applicable to employment areas within Welborne, the Fareham Borough Non-Residential Parking Standards SPD needs to be applied in conjunction with the Welborne Design Guidance Supplementary Planning Document. The Executive has previously approved a draft of the Welborne Design Guidance SPD for consultation and a final version for Adoption will shortly be presented to the Executive for their consideration and approval.
33. The emerging Welborne Design Guidance SPD recommends the establishment of a clear strategy for the relationship between employment and residential areas of Welborne. The relative location of these areas may contribute positively towards a reduction in the overall requirement for parking provision.

34. The emerging Welborne Design Guidance SPD states that car parking within all centres should be provided in accordance with Fareham Borough Non-Residential Parking Standards SPD, ensuring that the parking areas are convenient, well-enclosed by adjacent buildings and connecting directly to key areas of the public realm. The emerging Welborne Design Guidance SPD also states that proposals for multi-level car parking should demonstrate that the facilities will complement the area's public realm.

Solent Enterprise Zone at Daedalus

35. Major development proposals in the Borough being brought forward in 2015 and subsequent years include Solent Enterprise Zone at Daedalus.
36. The scale of development may provide an opportunity for the sharing of parking spaces across adjacent sites, with the possibility that land allocated for parking can accommodate greater demand in the future associated with intensification of use, or otherwise reallocated to more sustainable uses.

DESCRIPTION OF NEW PARKING STANDARDS

37. Parking standards for each Use Class type and sub-type to be applied to new developments are defined in tables contained within the SPD document (for Adoption) attached as Appendix B.
38. For the avoidance of doubt, each standard should be interpreted as a 'requirement' rather than a maximum or minimum figure, with permitted variations where these can be supported by evidence contained within a Transport Assessment or other compelling evidence.
39. Provided the quantum of parking space meets the overall requirement in larger developments then consideration can be given to a departure from standards if there is a clear benefit in doing so. A balance will need to be struck between unnecessarily partitioning individual site requirements and ensuring that overall provision is appropriate to the proposed development and its location.

Use Classes

40. The standards are categorised by the following Use Classes, with sub-type descriptions given in the tables in the SPD document:
- Retail (A1-A2)
 - Food and Drink (A3-A5)
 - Commercial (B1-B8)
 - Hotels, Assembly and Leisure (C1, D2)
 - Health Establishments (C2, D1)
 - Care Establishments (C2, D1)
 - Educational Establishments (C2, D1)
 - Other Uses (Sui Generis)
41. The parking standards defined in the Fareham Borough Non-Residential Parking Standards SPD (for Adoption) are for Use Class sub-types that relate to planning applications received by Fareham Borough Council.

42. It should be noted that the proposals for educational establishments are consistent with the standards set out in the document entitled “On-Site School Parking Guidelines” (April 2013) from Hampshire County Council. This document updates the guidance given in the County Council’s (now withdrawn) 2002 Standards, and is based on a sample audit of school sites across Hampshire which gave a better understanding of travel patterns.

Parking Space Requirements - Operational

43. Total spatial requirements for a particular land use can generally be represented as the combination of operational and non-operational needs.
44. Operational needs will include parking for vehicles directly associated with servicing, essential maintenance, deliveries and storage, together with space for set-down and loading. For example, in the case of Health and Care establishments this will include areas which enable ambulances and mini-buses to operate efficiently.

Parking Space Requirements – Non-Operational

45. Parking for non-operational needs will include spaces for staff, visitors and customers to park their vehicles. In the case of Educational establishments it may also be necessary to consider requirements for student parking spaces.
46. These requirements are sub-divided as follows:
- Regular parking spaces
 - Disabled parking spaces (typically 6% of total spaces located in the most accessible areas)
 - Motorcycle parking (also referred to as ‘Powered Two Wheelers’)
 - Cycle stands
47. The provision of cycle facilities is key to the objective of promoting the use of sustainable modes, and due consideration should be given to appropriate provision for secure, covered storage and showers that encourage cycling. For major developments these details will be included in a Travel Plan, and higher provision than the cycle standards presented in this document may be relevant, particularly where complementary measures are confirmed as part of an infrastructure delivery package.

Parking Standard Tables

48. Table 1 of Part B of the SPD document (Appendix B) sets out the car and car parking standards and operational parking space standards by Use Class type and sub-type. Standards are defined in terms of units representing the land use for the premises involved, for example total gross floor area (gfa), number of staff employed, seats or bedrooms.
49. The required standards given in Table 1 of the SPD document (Appendix B) represent the recommended figures for each Use Class type and parking category. However, where there is compelling evidence to depart from these standards it will be necessary to submit a Transport Assessment, Travel Plan or other supporting documentation as part of a Planning Application.
50. For development sites within town, district or local centres with higher levels of public parking and accessibility to public transport, consideration should be given to an

appropriate reduction in the required vehicle parking standards.

SUSTAINABILITY

51. Under the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations), Councils must carry out a Strategic Environmental Assessment (SEA) of land-use and spatial plans (including supplementary planning documents). However, where the Council can demonstrate that any land-use or spatial plan is unlikely to have significant environmental effects (Regulation 9(3)), a SEA will not be required.
52. In principle, supplementary planning documents should not be subject to the SEA Directive or require sustainability appraisal because they do not normally introduce new policies or proposals or modify planning documents which have already been subject to sustainability appraisal. However, a supplementary planning document may occasionally be found likely to give rise to significant effects which have not been formally assessed in the context of a higher-level planning document.
53. In order to determine whether this supplementary planning document is likely to have a significant effect on the environment, and hence require a SEA, the Council undertook a screening process against a specified set of criteria. The results of the screening process indicated that a SEA is not required to be undertaken for this SPD, and both Natural England and Historic England (the successor body to English Heritage) have confirmed that they do not consider that the SPD should be subject to a SEA.

CONSULTATION

54. The main consultation exercise took place over a 6-week period commencing on 22 June 2015 and ending on 3 August. All individuals and organisations listed on the Council's Local Plans database were informed of the consultation with an opportunity to submit comments on the document. The document and consultation details were also published on the Council's website and comments received via the 'Have your Say' page.
55. Following completion of the consultation period, the Council has produced a summary of the comments made, together with the proposed Council response to them, and identifying where relevant proposed revisions to the SPD should be made (see Appendix A). The final "for Adoption" version of the SPD does not have to undergo external examination and can be formally adopted by the Executive.

RISK ASSESSMENT

56. There are no significant risk considerations in relation to this report.

CONCLUSIONS

57. The withdrawal of Hampshire County Council's Parking Strategy and Standards (2002) in April 2014 has led to the need to consider appropriate guidance for non-residential parking standards in the Borough. The guidance for residential developments given in the "Residential Car & Cycle Parking Standards Supplementary Planning Document (Fareham Local Development Framework)" issued by Fareham Borough Council in November 2009 is unaffected by this change and continue to be applicable.
58. A recent Planning Statement issued by Government has further clarified the interpretation of the National Planning Policy Framework (NPPF) and recommended that local parking standards for residential and non-residential development only be

imposed where there this a compelling justification required to manage the local road network. It is considered that providing guidance on standards would be beneficial in order to enable viable and sustainable developments to be brought forward and ensure consistency in parking provision across the Borough.

59. A review of case studies drawn from recent planning applications has informed the preparation of new parking standards, in particular where difficulties have been experienced in the definition of Use Classes and as a result of intensification of use at specific sites.
60. It was concluded from this review that it would be appropriate for the HCC 2002 maximum figures to form the basis for specifying revised parking standards. These would be specified as 'required' standards recommended for all developments within each Use Class type category, but with exceptions permitted including reduced levels of parking for retail developments in Fareham Town Centre characterised by the availability of public off-street parking spaces and better access to rail and bus services. The guidance would also provide scope for departures from standards in cases where these can be supported by a Transport Assessment, Transport Statement or Travel Plan.
61. A consultation exercise has been carried out over a 6-week period starting on 22 June 2015, and a summary of comments together with proposed Council responses and changes to the SPD (for Adoption) is presented in Appendix A.
62. The proposed parking standards given in the SPD Document (for Adoption), attached as Appendix B, apply to both operational and non-operational space requirements of development. Non-operational requirements comprise regular car, disabled and motorcycle parking spaces and cycle stands.

APPENDICES

- Appendix A:** Summary of Consultation Comments Received on Draft Fareham Borough Non-Residential Parking Standards Supplementary Planning Document and Proposed Council Responses
- Appendix B:** Fareham Borough Non-Residential Parking Standards Supplementary Planning Document (for Adoption)

APPENDIX A

No	Consultation Comments Received	Proposed Council Response and SPD Amendment
1	<p>I have looked at the consultation document mainly from my interest in it in relation to any future development which we may want to carry out at West End Chapel, St. Annes Grove, Fareham. I am not sure where in the various use classes mentioned a Chapel or church comes. I assumed it was sui generis, but they do not seem to be included in your sui generis examples?</p> <p>Proposes wording which would recognise that applications for additional buildings on a site should not, as a matter of course, require additional car parking to be provided while the same use continues (i.e. church/community use), but that everything should depend on the nature of the 'extension'. Thus, it would be reasonable to require more parking where the main meeting room ('sanctuary') is to be extended to accommodate a greater number of worshippers, but it would not be a requirement to increase the number of available car parking places where the permitted 'extension' was e.g. as a separate 'sports hall' or secondary meeting room.</p>	<p>The parking standards defined in the SPD are for the most relevant Use Class types relating to planning applications received by the Council. Additional wording has been included in Section A5 of the document for proposed developments that do not fall into one of the categories listed in Table 1 of Part B, referring back to the assessment factors identified in the NPPF.</p> <p>Each case will be considered on its merits with details requested of the proposed developments, in particular the type of uses, which could be addressed via a Planning Condition or Legal Agreement.</p>
2	<p>It was good to have the opportunity to review council documentation written in sensible plain English which is understandable rather than being in legalistic gobbledegook. All matters raised and promoted for further council discussion and approval are supported by my wife and self.</p>	<p>Comments noted and no amendments required.</p>
3	<p><u>Hampshire Chamber of Commerce</u> Broadly supportive of new parking standards, but with exceptions:</p> <ol style="list-style-type: none"> 1. Greater emphasis on the need for greater flexibility in special circumstances – not a 'one size fits all' approach. Examples of educational establishments are quoted which are characterised by considerable numbers of non-teaching staff, and the difficulty in estimating future staffing levels. 2. More guidance on what constitutes these special circumstances (Ref NPPF para 10) and how it would be applied in practice. 3. Review standard for 'Food Retail' Use Class type by assessing the demand for existing convenience stores – quotes example of different requirements for an out-of town Tesco Extra compared with a local centre Tesco Express. 4. Full and integrated linkage between provision of car parking spaces for both residential and non-residential developments with active and ongoing residential/business travel plan policies and implementation to balance the requirements for car parking with greater encouragement of non-car based travel provisions. 	<p>The need for flexibility in the application standards is highlighted in the SPD, including consideration of future levels of activity and changes of use.</p> <p>With regard to food retail, the Council recognises the different requirements applicable to local stores and out-of-town developments, and will consider each case on its merits - as at present – taking account of evidence submitted in support of proposals.</p> <p>An example has been added to Part B of the SPD illustrating the application of standards to a mixed-use development with both residential and non-residential elements.</p>
4	<p>The SPD fails to address the problem of businesses using Fareham Borough Council car parks for their benefit against</p>	<p>The objective of the SPD is to ensure as far as possible that</p>

	<p>those of the people of the Borough. I am particularly concerned with a car sales firm who consistently use Wallington car park for the holding of their over stocked premises.</p>	<p>non-residential developments provide an adequate level of parking to meet operational needs.</p> <p>The Council's Parking Services team are monitoring usage of the Wallington/Broadcut Car Park to identify options for increasing the availability of spaces.</p>
5	<p><u>Historic England</u> I confirm that Historic England has no comments to make on the new standards. I also confirm that we do not consider that the SPD need to be subject to a Strategic Environmental Assessment.</p>	<p>Comments noted in respect of there being no requirement for a Strategic Environmental Assessment.</p>
6	<p><u>Natural England</u> We agree with your conclusion that the SPD is unlikely to require an SEA.</p> <p>I would like to mention that any new car parks within the vicinity (400m) of the Solent and Southampton Water Special Protection Area (SPA) and Portsmouth Harbour SPA, could lead to increased recreation on the SPA and so will need to be assessed on a case by case basis as they come forward. We therefore advise that this issue is incorporated into the SPD.</p>	<p>Comments noted in respect of there being no requirement for a Strategic Environmental Assessment.</p> <p>This SPD applies specifically to non-residential development that in normal circumstances would not lead to higher recreational use.</p>
7	<p>Comments received via the "Have Your Say" page on the Council's website – a total of 19 respondents including The Fareham Society:</p> <p>A common theme - mentioned by 5 respondents - is the need to provide more dedicated parking and/or better access to facilities for disabled drivers (for example, at educational establishments).</p>	<p>The requirements of disabled drivers are represented in the SPD through guidance on the provision of dedicated spaces in development proposals, and parking for mobility scooters where appropriate.</p>
8	<p><u>The Fareham Society</u> The Society is broadly supportive of this initiative, especially the section designed to overcome intensification or change of use when further planning permission is not required. This is currently a serious problem in the borough with incursion to the Highways from existing developments. Although a good example re: a medical practice is given, and despite this, it is believed a more robust solution should be produced. It is believed that even if a fuller explanation of the methodology to be used is provided, which might ensure consistency, this will always be insufficient to accurately assess future changes.</p> <p>In an ideal world the policy should state that any future requirement for additional parking spaces that are not capable of being provided in the existing development should require new planning permission.</p> <p>The Fareham Society is fully supportive of any initiative to support sustainable transport, and in particular likes the proposed differentiation in non-residential parking</p>	<p>The Council considers that sufficient detail is already included in the SPD to explain the derivation of new standards, and is commensurate with the need to ensure a consistent approach for all development proposals.</p>

requirements for Town Centre and Local District Centres versus less urban areas. The new FBC strategy and standards would benefit from providing a clear methodology for use in calculating the new standard figures, i.e. how have the spaces for gross floor area been arrived at?

The greater breakdown of non-residential sectors, plus the single standard, and not minimum or maximum numbers, is also welcomed. However, this makes direct comparison with the previous HCC standards difficult to assess. For consultation, a summary of the differences should be provided, or at least a broad overview of whether the new standards produce fewer or more parking spaces, We also welcome the section to allow discretion for individual developments, but this will require more instruction to ensure consistency across bespoke developments.