

	Name of respondent	Summary of representation	Officer's response
1	Mrs L. Sandford	Agree with the standards and hope they are going to be applied to development in West Byfleet centre.	Once the Parking Standards SPD is adopted, it will be a material consideration in planning decisions. In this regard, Officers and Councillors will have to take it into account in determining planning applications. Officers and Members will be briefed on the standards and their application.
2	Amec Foster Wheeler on behalf of National Grid	National Grid has no comments to make.	Noted.
3	Nick Alston (GVA) on behalf of Titanosaur Properties Limited	Welcomes the policy provision that states that on-site provision below the minimum standards will be considered within Woking Town Centre. However, in line with the Council's sustainable transport objectives and to account for the build to rent products the standards should go further by stating that provision below the minimum standards is expected for residential schemes in Woking Town Centre and that car-free residential development in Woking Town Centre is acceptable in principle, particularly in respect to build to rent schemes, where fully justified and evidenced with an application.	The Parking Standards SPD already allows scope for zero parking provision at the Town centre if that can be justified, and this is a reasonable approach for the Council to adopt. The Parking Standards are objective led, and its application will require balancing a set of objectives including control of congestion, highway safety and the efficient use of land. The minimum standards set out in the SPD strike a good balance between these competing objectives. The Council accepts that the Town Centre offers the best access to a range of services and facilities and is in close proximity to public transport nodes. The minimum parking standards takes that into consideration. The SPD recognises that there are instances that lesser parking provision would be acceptable if that can be justified by the specific locational characteristics of the development and the specific measures proposed to manage the travel needs of occupants of the development. Each proposal will therefore have to be considered on a case by case basis depending on the specific measures proposed to minimise car use to justify a lesser provision. Making the provision of lesser parking provision a requirement and an expectation as a policy principle will be unreasonable in this regard.
4	Alan Byrne on behalf of	No comments to make.	Noted.

	Historic England		
5	Mark Craven on behalf of Brookwood and Bridley Neighbourhood Forum	Broadly supports the Parking standards. Concern that often two bedroom houses/flats will have more than one adult and consequently more than one car. Having one space for two bedroom dwellings may be sufficient in one-off developments, but unlikely to be sufficient for many two bedroom dwellings in close proximity. It should be made harder for properties with garages to convert to living accommodation. When garages are built, they should be of sufficient size to allow for modern SUV.	The Parking Standards broadly reflects car ownership across various sizes of bedrooms and house types. It is acknowledged that there will be instances where two bedroom houses/flats will have more than one adult and consequently more than one car. The parking standards are objective led to help amongst other things to influence a shift to sustainable modes, ensure highway safety and maximise the efficient use of land. The standards are set as minimum standards, so if a case can be made for more provision to be made than what is specified in the SPD, the Council will consider that. The SPD gives a minimum size for garages, which is adequate to accommodate modern cars.
6	Terry Dale on behalf of ASDA Stores Ltd	ASDA has undertaken an exercise to demonstrate that the application of a locational reduction factor to maximum retail car parking standards could lead to the under provision of car parking spaces; this in turn, could lead to road safety issues. Details of the exercise are in the representations and can be inspected.	The principle of having a locational reduction factor is reasonable. The reduction factor applies to the main centres which relatively offer the best access to a range of services and facilities. Whilst the Council notes the analysis carried out by ASDA and finds it helpful, it does not fully take into account the significant scope at the main centres to encourage walking, cycling and public transport to access day to day needs. The Parking Standards SPD does not sit in isolation. There are other measures the Council is undertaking to improve walking and cycling infrastructure across the borough. If a specific company or a specific proposal requires a different parking provision to the ones set out in the SPD, then a case will have to be made for the Council to consider. It will be unreasonable for the Council to set out its parking standards on the basis of the specific needs of a particular company.
7	Prime Finance	West Byfleet Centre is a District Centre and the second largest centre in Woking. It has a	The Council is aware of Prime Finance's proposal to redevelop part of the West Byfleet Centre. The

		<p>primary role to serve the needs of Byfleet, Pyrford, West Byfleet and its rural hinterland. The centre is identified to deliver high density mixed-use development that is well designed and integrated to enhance the local character. The West Byfleet Neighbourhood Plan sets out a vision for enhancing the areas character and supporting sustainable development through improved facilities and opportunities for local employment. Prime Finance's redevelopment proposals at West Byfleet centre will play a key role in delivering this vision.</p> <p>The West Byfleet centre is in sustainable location and benefits from high frequency bus routes and a rail station in close proximity. The client has submitted a planning application for a significant redevelopment at the centre which will deliver several economic, social and environmental benefits.</p> <p>Paragraph 30 of the NPPF provides guidance on the matters to take into account when setting parking standards. It is implicit from national policy that less car parking will be necessary to deliver this.</p> <p>Prime Finance welcomes the general approach of the Parking Standards, which establishes standards below average car ownership levels. However, in its current form, the parking standards specific to West Byfleet District Centre are considered to provide a burden to the redevelopment of the centre. Prime Finance application is predicated on the capacity of the basement, this being integral to ensure the development delivers the significant amount of new public amenity space to meet</p>	<p>planning application is being determined on its own merits by the Local Planning Authority separate from consideration of the Parking Standards SPD by the Council. In any case, it will be unreasonable to expect the Council to set its parking standards based on the specific needs of a single development proposal. West Byfleet centre is a District Centre with a relatively good range of services and facilities that are accessible by public transport and easy reach by walking and cycling. However, it will be unreasonable to compare West Byfleet District Centre with Woking Town Centre in the way that the representation does. Section 4.1 of the Parking Standards SPD makes this particular point very clear by clarifying that zero parking would only be applicable in Woking Town Centre. Because of the locational characteristics of the District Centre it is important that the parking standards and its application do not compromise highway safety. The provision of adequate parking to serve development is a key concern of residents in West Byfleet, and this is expressed in the West Byfleet Neighbourhood Plan. Policy BE6 of the West Byfleet Neighbourhood Plan sets out parking standards for residential development which is broadly similar to the SPD. The Neighbourhood Plan has been through Examination and the Examiner has recommended that subject to its proposed modifications, the Plan should proceed to referendum. Once adopted the Neighbourhood Plan will form part of the Development Plan for the area and will be fully taken into account in planning decisions. It should be noted the Neighbourhood Plan proposes the provision of 2 car parking spaces for 2-3 bedroom property. The Neighbourhood Plan also specifies that the current level of off-road car parking available to shoppers and visitors in the Sheer House Complex</p>
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		<p>community aspirations. If the Parking Standards is to accord with national policy, West Byfleet District Centre should be accorded a similar level of flexibility to that proposed to be permitted in Woking Town centre, i.e. on line provision below the minimum standards.</p> <p>Chapter 9 of the Council's Transport and Accessibility Topic Paper establishes that parking management is one tool that can be used to influence a shift in behaviour towards other forms of transport modes, particularly in areas with high public transport choice and accessibility. Prime Finance proposal includes measure to encourage sustainable travel and to encourage people not to use cars. In allowing flexibility for parking standards the SPD should recognise the mitigation measures in order to encourage a shift in travel behaviour.</p>	<p>redevelopment should not be reduced (Policy CE6). It is highlighted that 50% reduction of the standards is proposed for other uses other than residential. If a particular application or proposal requires a specific parking provision to be made based on specific locational characteristics and proposed measures to manage the travel needs of occupants, then a case has to be done for the Council to consider. This will have to be done on a case by case basis subject to the individual merits of the proposal.</p> <p>The reference to paragraph 30 of the NPPF is noted. However, this should not be seen in isolation from the Government's overall policy on parking which is set out in paragraph 39. Paragraph 30 requires a balance of considerations that could justify reduced parking provision. It should not be read as meaning reduced parking provision is expected without the necessary measures to manage travel needs. The Government's direction of travel regarding parking provision is encapsulated in the following ministerial statement issued in March 2015 and post dates the NPPF: <i>This government is keen to ensure that there is adequate parking provision both in new residential developments and around our town centres and high streets. The imposition of maximum parking standards under the last administration leads to blocked and congested streets and pavement parking. Arbitrary restricting new off-street parking spaces do not reduce car use. It just leads to parking misery. It is for this reason that the government abolished national maximum standards in 2011. The market is best placed to decide if additional parking spaces should be provided</i></p>
8	Paula Carney	Broadly supports the principles underpinning the Parking Standards in relation to the Town	Having minimum standards at the Town Centre is a reasonable principle to enable a balance to be struck

		<p>Centre but request that it should go much further by removing altogether minimum standards for the Town Centre because of its close proximity to key services and facilities and sustainable transport modes. This will provide certainty to developers. The SPD should promote car clubs and use of public car parks and entering into agreements to not allow residential parking permits to be issued in the town centre other than for the disabled. The cycle parking standards should allow less cycle parking with smaller units. For example, studios and one bed flats should have a requirement of 1 space per unit.</p>	<p>between the competing parking objectives such as the need to maximise the efficient use of land and the protection of highway safety. The Parking Standards SPD allows flexibility and scope for zero parking provision at the Town Centre if it can be justified. In particular, any such proposal will have to demonstrate how the travel needs of occupiers of the development will be managed. A key essence of the parking standards is to provide certainty to developers about the level of parking provision to service development. It does so by recognising that there could be instances where lower or higher provision could be justified, and that flexibility is helpful. The policy context to the parking standards seeks to promote travel plans and sign posts to initiatives such as car clubs. Consideration of access to and the use of public transport is one of the key objectives of the Parking Standards and national policy.</p>
9	Phil Stubbs on behalf of Knaphill Residents Association	<p>The revised Parking Standards is overdue and makes sense. The key is whether Planning Officers in evaluating a planning application will apply them. The record of the County's highways planning is poor. It is crucial that the local Planning Officers and Members of the planning committee challenge the county's advice where it is felt appropriate. Section 3 makes reference to congestion and highlights a number of areas such as Knaphill and follows it with the statement '<i>the traffic impacts are considered unlikely to be sufficient enough to cause major disruption or require highway infrastructure improvement measures</i>'. This section should be redrafted and the reference in italics deleted. The parking standard for one bedroom flat</p>	<p>If the Council is minded to adopt the Parking Standards SPD, it will have the status of a Supplementary Planning Document (SPD), and will be a material consideration in all relevant planning applications. The County Council is the highway authority for the area and are consulted on planning applications when necessary. The Council has not had any significant concerns about the advice provided by the County Council, and will not hesitate to challenge any advice if it felt the advice needed clarification and/or further explanation. This will apply to any other advice sought by the Council. The reference to the traffic impacts not likely to be sufficient to require highway infrastructure improvement measures will be amended to reflect current evidence. The up to date transport assessment identifies a number of traffic hotspots across the</p>

		<p>(0.5) is inadequate. Because of house prices and lack of one bedroom houses many first time buyers, including couples are purchasing flats. The wording on visitor parking needs strengthening. 'If you have a block of flats or apartment comprising 6 or more units there should be a minimum requirement of 1 visitor parking space for every 3 units'.</p> <p>If the Council is to continue with its policy of permitting the conversion of garages to habitable space then garages should be removed from the calculation for off-street parking provision. Any dwelling where garage conversion is requested the off street parking provision should meet the requirements of the standards in Table 3.</p>	<p>borough which will need appropriate measure of mitigation.</p> <p>The parking standards reflect the number of cars available in a household per various sizes and types of homes. The 0.5 provision to support 1 bedroom flats strikes an appropriate average provision based on the available evidence. Nevertheless, the standards are minimum standards, and if a case can be made for higher provision for specific proposals because of their specific needs, the Council will consider. It is important to emphasise that the parking standards are objective led and Officers and Members will take the objectives into account when applying the standards to specific proposals to make sure that they are not undermined. It is necessary for the Council to have the flexibility to negotiate visitor parking taking into account the merits of each proposal than to be prescriptive on a threshold as suggested. Where it is justified, the approach to the parking standards allow scope for an appropriate visitor parking to be considered. This has been strengthened to provide further clarity.</p> <p>The Council will normally put a condition on a planning approval to prevent the conversion of a garage to a habitable room. It is acknowledged that there are some buildings pre 1960s without such conditions which could be converted under permitted development. Much more control can be exercised for future applications to convert garages to habitable rooms. The parking standards will be amended to highlight the need to impose a condition to prevent the conversion of garages to habitable rooms.</p>
10	Peter Jones	The Altitude proposal for West Byfleet centre does not provide sufficient parking to serve the proposed development.	This is a matter that can best be dealt with as part of the consideration of the planning application.
11	Beata Ginn on behalf of	Have no comments.	Comment noted.

	Highways England		
12	Councillor Kevin Davis	<p>Consideration should be given to converting some grass verges to proper paved allocated parking.</p> <p>Where there are large developments of circa 25+ dwellings, the ratio could cause some problems if many of the dwellings are starter homes and have one to two bedrooms. There is a need for small dwellings across the borough, which will suit young growing families. For example, an estate of 100 houses of which 80 of them are a combination of flats and one/two bedrooms will have insufficient spaces to allow those estates to grow satisfactorily. In instances such as this the ratio a ratio of visitor parking should be defined to ensure there is sufficient room to take the slack.</p> <p>In developments of large site of circa 25+ dwellings, consideration should be given to providing some motorcycle parking provision with ground locks to assist security.</p> <p>Where a place of worship has congregation, which is not local to the building, insufficient parking can cause significant problems to the surrounding road as many worshipers frequently park with little regard for local residents. Where new or replacement places of worship come forward, consideration should be given to the location that worshipers travel from. All places of worship should have a travel plan in a similar way as schools.</p>	<p>The purpose of the Parking Standards SPD is to set appropriate parking provision to serve development. The Core Strategy and the Parking Standards SPD highlights the need for parking provision to be seen as an integral part of the overall design of development. The conversion of grass verges to provide off-site parking spaces is beyond the scope of the parking standards unless it is within the development site. Nevertheless, the suggestion will be passed on to the Parking Services Section of the Council to consider. The concern about the likelihood of a significant number of one/two bedrooms in major developments and the implications for insufficient level of parking provision is acknowledged. It will be difficult to be prescriptive about the appropriate level of parking for such instances. Nevertheless, the parking standards are set as minimum, and allow flexibility for such proposals to be considered on a case by case basis if it can be demonstrated that more parking is needed and its provision will not undermine the overall objectives of the parking standards.</p> <p>The Council has a clear policy to request a travel plan for any development that generates significant amount of traffic, and this would apply to places of worship if the transport assessment to support the development demonstrates that it will generate significant traffic. The need to apply the requirements of the policy will be communicated to relevant Officers. The parking standards for places of worship relate parking provision to number of seats rather than where the people who will occupy the seats travel from. This approach is reasonable because it is realistic to expect that the catchment area of worshipers to any place of worship will be wider than the immediate vicinity.</p>

			<p>The principle of making parking provision for motorbikes in major flatted developments in particular is reasonable. Motorbikes are owned by a significant minority of the population and as such setting a minimum threshold that is enforceable and defensible is often difficult. Nevertheless, it is important that the Parking Standards SPD should recognise the need and encourage provision on a case by case basis. The SPD has been amended to highlight that. Officers will also begin to gather empirical data to assess whether a minimum threshold can be justified in any future review of the SPD and/or used to support planning application decisions.</p>
13	Clark Gordon	No comments to make.	Noted
14	Marianne Meinke	<p>The Guidance Note on Travel Plans should be complete rather than signposting to various links and documents. The policy and Travel Plans should include a comprehensive summary of how neighbours will be protected. For example:</p> <ul style="list-style-type: none"> • Retails parks are lit with little thought on the impacts on neighbours; • How will pollution be monitored for the sites to which cars are sent; • In what way will plans be monitored to ensure everyone's health is considered and that coaches are modern, not diesel and that drivers turn off engines whilst waiting for passengers; • How will the Council ensure that Councillors will not at a whim protect schools with which they have a relationship and move traffic problems further along; 	<p>The representation makes a number of helpful comments. However, they relate to travel plans and other matters that are beyond the scope of the Parking Standards SPD and can best addressed by other sections of the Council and/or the County Council. Officers will liaise with the County Council and across other sections of the Council to explore these concerns could be addressed.</p>

		<ul style="list-style-type: none"> • How will WBC ensure all pedestrians are kept safe; • Will Travel Plans take into account fatalities and other accidents in the area to which traffic is redirected; • To protect neighbours, will the window for use of sites such as retail parks be limited so that neighbours are allowed some time of peace and quite. 	
15	Marianne Meinke	<p>Object to the introduction of Travel Plans in its current form because it fails to achieve the Government's objective for walking and cycling to be the natural choice for shorter journeys and for streets to be better. The local school travel plan have brought more cars to the Lion Retail Park creating greater pollution and congestion in the area, whilst freeing up roads near schools and reducing complaints from their immediate neighbours. Moving traffic problems on merely transfers the problem and not solves it.</p> <p>The number and timing of lights for pedestrians and traffic between Old Woking Road and Sixways Crossroads makes motorist frustrated and aggressive. The three roundabouts near the Lion Retail Park are often congested and the area has become dangerous for pedestrians as motorists rarely give way. Sixways is also an accident blackspot and the road in between suffers from pollution. Travel plans are being used to enable the expansion of businesses and schools.</p> <p>The representation makes reference to the details of the travel plan relating to planning application reference PLAN/2016/1204 and</p>	<p>The representation makes a number of helpful comments. However, they relate to travel plans and other matters that are beyond the scope of the Parking Standards SPD. Officers will liaise with the County Council and across other sections of the Council to explore these concerns could be addressed.</p>

		<p>PLAN/2015/1438. The details cover 16 separate points, and are in the representation and can be inspected.</p> <p>There seems to be the need for more parking and not less.</p> <p>There is nothing in the SPD or travel plans which set standards for the age and quality of vehicles to be used. Many are smelly. The selection of contractors is done on cost and health too should matter.</p> <p>Consultation on planning applications is not fair or reasonable.</p> <p>A number of planning enforcement matters is raised and the details are set out in the representation and can be inspected.</p>	
16	Sarah Price	<p>The Parking Standards states: <i>in Woking Town centre, where fully justified and evidenced within an application, on site parking provision below the minimum standards set out below will be considered.</i> Would the Council be able to give some indication as to what percentage decrease to the minimum standards could possibly be accepted for a development within 1 km from Woking station?</p> <p>Cycle provision has doubled since in the revised SPD. Would the new provision apply to flats or just family homes?</p>	<p>It will be unhelpful to speculate what the level of reduction of the standards would be for proposals within 1 km from the station. It would depend on a number of factors, some of which will be difficult to pre-determine. It will for the applicant to make the case taken into account the specific locational characteristics and any measures proposed to manage the travel needs of the occupiers of the development.</p> <p>The cycle parking standards do not draw a distinction between flats and houses. The standards apply to both.</p>
17	Mrs Carla Wright on behalf of Natural England	SPD does not relate to area of interest and do not wish to comment.	Comment noted.
18	Ziyad Thomas on behalf of McCarthy and Stone	Commends the SPD for the manner it acknowledges the difference in the parking needs of general housing and specialist accommodation. The requirement for 1 space per unit would constitute overprovision of	The parking standards set for the elderly has been done in the context of Policy CS13: <i>Older people and vulnerable groups of the Core Strategy</i> . In this regard, it is proposed that the title of this section of the SPD should be 'Accessible parking' to also include other

		<p>parking provision.</p> <p>Retirement Living (Category 11 sheltered housing) has been defined as '<i>grouped flatlets to meet the needs of the less active elderly people</i>' although residents are not so frail as to be wholly inactive. A significant proportion of residents give up car ownership before they enter this form of housing. Reduction in car ownership is exacerbated for residents in extra care accommodation which is specialist older persons accommodation aimed at the frail elderly of about an average age of 83 years. The parking requirement will make it difficult to deliver these products in the most sustainable locations. The approved South Gloucestershire Council Residential Parking Standards is an example to consider.</p>	<p>vulnerable groups. Broadly speaking many people would want to live in their own accommodations as long as possible. Other does so by having a live in carer. There are a variety of needs within this category of provision and on average the proposed threshold are set at a reasonable level. The SPD allow scope for a case to be made and the Council to consider if it can be demonstrated that lower standards are necessary for a particular scheme.</p>
19	Peter Badger	This representation draws attention to an incomplete sentence in the SPD.	Comment already addressed to the satisfaction of Mr. Badger.
20	Becky Wilson on behalf of Surrey County Council	<p>The SPD specifies that the design of cycle parking should allow for a cycle to be parked either side and both wheels to be easily locked to the stand such the Sheffield A frame or CaMden type stands. It should also specify 'not using styles of cycle stand that hold a wheel. Sheffield stands are the most inclusive to be suggested.</p> <p>It is not clear whether the area specified for minimum parking spaces is based on the area of the building or the area of the land. Clarification will be helpful.</p>	<p>The suggested additional wording is reasonable and the SPD will be modified to reflect that.</p> <p>The standards apply to the floor areas of the buildings for the various uses. This will be made clear in the SPD.</p>
21	Katrina Warne	The Heathrow coach connection from Woking Rail station used to be every 30 minutes. It is now every hour. It might help to go back to a frequent service. The cost of public transport is	The representation is helpful to note but is outside the scope of the Parking Standards SPD. The issues will be raised with the coach company.

		prohibitive.	
22	Mark Draisey	<p>The reference that there is no need for improvements to the A320 and Six Crossroads despite expansion of housing in the area is cavalier and deliberately false.</p> <p>The strategy is a piecemeal assortment of rules individually supporting a masterplan of reducing car use but not joined up in any meaningful way. For example, the Council wants to increase use of public transport but is making it harder to get to the Station. Small shops need short term parking for drop offs and pick ups of purchases. Potential stop off points should not all be filled with planters. Traffic lights are phased in the most bizarre ways to stop cars at every junction. The principle should be to route cars through the recognised main routes as swiftly as practicable, only allowing site roads to join the main flow at extended intervals and providing short term stopping in those areas.</p> <p>Bus stopover parking is a total abuse of scarce space. Object to any action which seeks to punish/penalise Woking citizens in order to drum them into line with the Council's thinking.</p>	<p>Concern about reference to improvements to the A320 and Six Crossroads has already been addressed as part of the Officer's response to another representation. The SPD has been modified to take into account up to date information.</p> <p>The Council notes the importance of an integrated approach to managing the transport implications of development, and strives to achieve that.</p> <p>Nevertheless, the concerns about traffic management are beyond the scope of the SPD. The Council already has robust policies to make sure that appropriate arrangements are made for servicing and deliveries for commercial development. An example of such policies is Policy DM16 of the Development Management Policies DPD.</p> <p>The objective to minimise car use and reduce congestion is a clear transport policy at both national and local levels. Parking provision plays a role in achieving this objective but is one of many strategies and projects coordinated to help achieve this goal. This includes improvements to rail, road, walking and cycling infrastructure.</p>
23	Jeannie Ley	Wish to know whether there was any Council decision about parking at Oakcroft Road on 22 March.	This is a development management matter. The information will be sought and sent to Jeannie Ley as requested.
24	Bob Tilley	Before finalising the draft SPD it is strongly recommended that Officers and Councillors read an article about parking policy, Aparkalypser now on page 14 of the Economist dated April 8 – 14 2017.	Officers have read the article as requested and Members attention is drawn to it. The article is about how parking is managed in various cities and states across the world, including places such as Chicago, Boston and Minnesota. Copies of the article can be obtained on request.
25	Bill Pugh	If the Council took time to explain in plain	The comments are noted. Officers will continue to

		English what it is doing at Martyrs Lane people would be able to comment on it.	seek improvements on how it prepares and communicates its policies in consultation documents.
26	Pauline Marshall	<p>The question of next door properties and access to the rest of properties by fire engine etc. must be considered when dealing with planning applications.</p> <p>Conversion of garages to residential accommodation should be restricted as they lead to loss of secured accommodation for cycles etc. Garages should be large enough to fit a modern vehicle.</p> <p>A house with 2+ bedrooms will probably have more than two cars.</p> <p>There should be disable parking spaces outside chemist shops and similar places.</p> <p>Shops out the main town area should provide parking outside or in nearby car parl.</p> <p>If people can park at where their vehicles will not be stolen or damaged they will possibly use other modes of transport. There is the need to make pavements and crossing the road safer for all people and children using them.</p>	<p>The concern about next door properties is a development management issue, and the attention of the relevant Officers will be drawn to that. Similarly, the comment about the need to make pavements and crossings safer will be passed to the relevant Officers.</p> <p>In response to another representation, Officers are recommending a modification to the SPD to impose a condition to restrict the conversion of garages to habitable rooms. The SPD specifies the minimum size of a garage, which is adequate to accommodate a modern car.</p> <p>The parking standards reflect the number of cars per household for various sizes and types of dwellings. The specified average of 1 dwelling for a two bedroom house or flat is based on the available evidence on car ownership and is adequate. It is accepted that there will be instances where occupants of a two bedroom house/flat might have two cars. If the locational characteristics and the individual merits of the proposal can justify more parking provision, the SPD allow flexibility for the Council to consider, taking into account the objectives of the parking standards.</p> <p>Section 4.4 of the SPD deals with disabled parking. The specified standards for business premises make provision for additional parking bays to serve others other than disable employees.</p> <p>The security of off-site parking provision is beyond the scope of the SPD. The comment will be passed to the relevant Officers of the Council to consider.</p>