



Supplementary Planning Guidance

No.18 Telecommunications

Adopted by Flintshire
County Council on 17th
January 2017



Purpose

It is Flintshire County Council's intention to prepare and keep up to date a series of Supplementary Planning Guidance (SPG) Notes which will provide detailed guidance on a range of development issues and topics. The purposes of these Notes are:

- To assist the public and their agents in preparing planning proposals and to guide them in discussions with officers prior to the submission of planning applications,
- To guide officers in handling, and officers and councillors in deciding, planning applications, and
- To assist Inspectors in the determination of appeals

The overall aim is to improve the quality of new development and facilitate a consistent and transparent approach to decision making.

Planning policies: the Flintshire context

The Development Plan

Under planning legislation, the planning policies for each area should be set out formally in the Development Plan. Flintshire County Council, as the Local Planning Authority (LPA), has a legal duty to prepare and keep up to date a development plan for the County, and the Flintshire Unitary Development Plan was adopted in 2011. The UDP provides broad policies together with allocations of land for all the main uses such as housing, employment and retailing, and will help to shape the future of Flintshire in a physical and environmental sense as well as influencing it in economic and social terms. The Plan therefore seeks:

- To help the Council make rational and consistent decisions on planning applications by providing a policy framework consistent with national policy and
- To guide development to appropriate locations over the period up to 2015.

The need for Supplementary Planning Guidance

Despite the Plan containing policies with which the Council can make consistent and transparent decisions on development proposals, it cannot in itself give all the detailed advice needed by officers and prospective applicants to guide proposals at the local level, such as house extensions or conversions of agricultural buildings. The Council's intention is to prepare a range of Supplementary Planning Guidance notes (SPG) to support the UDP by providing more detailed guidance on a range of topics and issues to help the interpretation and implementation of the policies and proposals in the UDP. The review of the Local Planning Guidance Notes will be undertaken on a phased basis and details of the available SPG's can be found on the Council's website. Where there is a need to refer to another SPG this will be clearly referenced. These SPG Notes are freely available from Planning Services, Directorate of Environment, County Hall, Mold, Flintshire CH7 6NF (telephone 01352 703228), at the Planning Services reception at County Hall and can be downloaded from the Planning Web pages www.flintshire.gov.uk/planning

The status of Supplementary Planning Guidance

Supplementary planning guidance can be taken into account as a material consideration in the decision making process. The National Assembly will give substantial weight to SPG which derives out of and is consistent with the development plan. In accordance with National Assembly advice the Council's suite of SPG's has been the subject of public consultation and Council resolution. The draft of this SPG was approved for public consultation on 26.07.13 (Council Minute no.17). The SPG was the subject of a public consultation exercise between 18.12.15 and 12.02.16. The 5 comments submitted to the Council have been taken into account and where appropriate amendments have been incorporated into this final draft which was approved by the Council on 17.01.17 (Council Minute no.8) for use as a material consideration in determining planning applications and appeals. A summary of the representations and the Council's response is set out in Appendix 3.

This document should therefore be afforded considerable weight as a material planning consideration.

No.18 Telecommunications

1 - Background

1.1 - Telecommunications are accepted as an essential element of modern life which bring benefits to the nation's economic well being and our social environment. Government policy encourages business, industry, local government and schools to embrace and use new technology. The industry is growing rapidly, with public demand and Government requirements for greater network capacity and geographical coverage, competition between operators, and technological innovation. The Government also seeks to protect the environment and is responsible for public health issues and both are matters which increasingly concern the public at the local level when proposals for new telecommunications equipment are announced. In the case of each proposal, a balance must be found. For its part, the Welsh Assembly Government (WAG) recognises the need for access to modern, high-speed telecommunications services throughout Wales, which can help meet the Assembly's sustainable development and equal opportunity commitments, and especially assist those people living and working in remote rural areas. It is acknowledged that good quality telecommunications help to reduce the need for travel, and improve community safety by reducing crime.

1.2 - This Local Planning Guidance Note (LPG) is principally concerned with telecommunications masts and base stations, but includes also a brief section on satellite antennas and other small scale developments relevant to householders and small businesses.

2 - Policy

2.1 - The Welsh Government (WG) in "Planning Policy Wales" (PPW) 2016 (Paragraph 12.11.1) states that "Local Planning Authorities are encouraged to respond positively to telecommunications development proposals, while taking account of the advice on the protection of urban and rural areas." Additional Government guidance is given in "Technical Advice Note 19 Telecommunications" (TAN 19) of August 2002 and their "Code of Best Practice on Mobile Phone Network Development" published in July 2003, all of which have been taken into account in this document. The Code is non-statutory but the current five operators (O2, Orange, Vodafone, T-Mobile, and 3 Mobile/Hutchinson 3G) have agreed to follow it. TAN 19 describes the technological changes over recent years. TAN 8 Annex C also provides guidance on telecommunications and wind turbines.

2.2 - In its overall strategy, the Flintshire Unitary Development Plan (UDP) at Policy STR2 Transport and Communications, expresses the expectation that new development will seek to facilitate the provision and use of telecommunications. Policy GEN 1 General Requirements for Development aims to ensure that development is not harmful to the natural environment, nor affects the safety and amenity of humans. Proposals for development should incorporate the highest standards of quality and design possible, be carried out in a responsible and appropriate manner, and have the minimum adverse impacts on the physical, social and economic environment around them. More specifically, three UDP policies apply to telecommunications: AC22 Location of Installations, AC23 New Development and Interference with Telecommunications Signals, and AC 24 Cable Installation. These are quoted in Appendix 1, which includes also Policy AC12 Airport Safeguarding Zone.



3 - Planning controls

3.1 - Some very minor telecommunications operations are not considered to be development at all and therefore do not require any type of approval. This includes the installation of small satellite dishes and television aerials on domestic properties. Microcells such as those similar in appearance to burglar alarms or concealed in petrol forecourt signs are also examples.

Minor Telecommunications Development

3.2 - Other telecommunications development fall into one of three categories:

Permitted development

3.3 - Some forms of development are considered by planning law to be 'permitted' and are therefore granted development consent without the need for a planning application. Telecommunications developments that are defined as 'permitted' are set out in schedule 2, part 4 of the Town and Country Planning (General Permitted Development) (Wales) Order 1995 as amended in 2002. This will typically involve small scale development such as the installation of additional antennas on existing masts, or base stations and equipment cabinets of less than 2.5 cubic metres. However, such telecommunications developments are not considered to be 'permitted' in National Parks, Conservation Areas, Areas of Outstanding Natural Beauty or Sites of Special Scientific Interest. In such areas developments would need to follow the prior approval procedure.

3.4 - Before beginning a development the developer must give 28 days notification to the Local Planning Authority (LPA) of their intention to install any telecommunications equipment. This will enable the LPA to determine whether the prior approval of the Authority will be required for the siting and appearance of the development. There may be circumstances where the exercise of a PD right could have a serious impact on amenity and if the LPA considers that the withdrawal of the right is necessary it may serve a direction. A direction regarding operators' apparatus will require the prior approval of the Assembly. Alternatively, the LPA may serve a breach of condition notice requiring the re-siting of the equipment, if it believes that the appropriate criteria have not been taken into account adequately. The basis for such an action is that the conditions of the PD rights have not been complied with and therefore the development does not enjoy PD rights. The LPA should suggest the improvement which it has in mind.



3.5 - Under PD rights telecommunications apparatus should be removed from the site as quickly as possible when it is no longer required, and the land, building or structure restored to its previous condition or to any other condition agreed in writing. Failure to do so would give the LPA grounds to serve a breach of condition notice requiring its removal.

Permitted Development

3.6 - The prior application procedure does not apply in respect of emergency works, in the sense of urgent repairs and not emergency services, as defined by the Telecommunications Act, 1984 (Paragraph 1 (1) of Schedule 2).

Prior approval

3.7 - Some larger telecommunications are still 'permitted development' but legislation requires the operator to apply to the LPA to see if their 'prior approval' is needed before beginning the development. The LPA then has upto 56 days to inform the operator of its decision or the development can proceed. There is no power to extend the 56 day period. Where the LPA considers that a refusal of approval may be justified it should first explore with the operator the possibility of changing the siting and/or appearance of the proposed development. The prior approval procedure means that the principle of development is not an issue, the local planning authority can only consider the siting and appearance of the proposal.

3.8 - The prior approval procedure applies to the construction, installation, alteration or replacement of:

- A ground based mast of up to and including 15m in height
- A mast of up to and including 15m in height installed on a building or structure
- An antennae (including any supporting structure) which exceeds the height of the building or structure (other than a mast) by 4m or more at the point where it is installed or to be installed
- A public call box
- Radio equipment housing with a volume of 2.5cubic metres
- Development ancillary to radio equipment housing (for example fences or access roads)
- Certain smaller scale development on land in National Parks, Conservation Areas, Area of Outstanding Natural Beauty and Sites of Special Scientific Interest.

Development requiring planning permission

3.9 - All other types of telecommunications development that fall outside of the permitted development criteria set out in legislation, will require an application for planning permission before they can proceed. For example, a ground based mast of more than 15m in height would require planning permission. If a planning application is required then the LPA will consider it in the same way as any other planning application i.e. in accordance with the development plan unless material considerations indicate otherwise. The use of conditions may be appropriate.

4 - Submitting an application

4.1 - Developers are strongly urged to make early contact with the Development Control Section of Planning Services in County Hall, Mold to discuss matters of location and design prior to the submission of a planning application. Initial contact should be with the Planning Support Officers in the Development Control Section, telephone 01352 703234.

4.2 - PPW also advocates pre-application discussions between operators and other organisations with an interest in the proposed development, including any local residents' groups. The Code of Best Practice includes a Traffic Light Model which allows a site to be rated by the operator according to its likely sensitivity in terms of environmental, planning and community considerations, and sets out an appropriate level of consultation depending on the results.

4.3 - When submitting the application, in addition to the fee, location and site plans, elevations and the application forms, the following should be included:

- A statement outlining the need for the proposal together with cell diagrams showing the area of search (which in some cases may extend beyond the county) and justification.
- A statement confirming clearly that the proposal, when operational, will meet the ICNIRP guidelines (see below) relating to health considerations, both in itself and cumulatively.
- An assessment of alternative sites within the cell in the contexts of sensitive areas and options for mast or site sharing, and the reasons for their rejection.
- Evidence that pre-application consultations have taken place with any nearby schools and colleges. ("Nearby" is not defined in Government guidance.)
- An assessment of levels of any noise emitted.
- A statement about site selection, taking into account landscape, impacts upon sensitive property, and including the impacts of all associated developments such as access works.

5 - Material planning considerations

5.1 - The LPA has to consider any development proposals in accordance with the development plan unless material considerations indicate otherwise. In the case of telecommunications, these relate principally to siting and design. (Other aspects with which the public or other third parties may be concerned are dealt with in a later section.) Under UDP Policy AC22, care must be taken to ensure that the siting and design of new facilities minimises their visual impact from surrounding viewpoints. Innovative design and landscaping

approaches may be the most acceptable solution where there is no alternative to locating in a site which is sensitive in landscape terms, but in such cases a feasibility study, requiring where appropriate a Landscape Impact Visual Assessment including accurate photo montages by a qualified and independent professional will be requested.

5.2 - The Government attaches considerable importance to the extent to which sharing of telecommunications masts is possible, thus keeping to a minimum the number of sites and masts. In line with this approach, Policy AC22 aims to ensure that any new sites/masts are available to others for use as a shared facility, which will be dealt with through a condition on a planning consent. In April 2011 there were approximately 103 sites within the county. A Register of Telecommunications Sites is maintained by the Council. Prospective applicants are strongly advised to consult this before making an application. In some instances sharing of masts may be the most acceptable solution, and the Council will expect applicants to show that they have considered this option. Policy AC22 requires adequate provision for the full restoration and aftercare of the site on any cessation of use. This will be included as a condition.

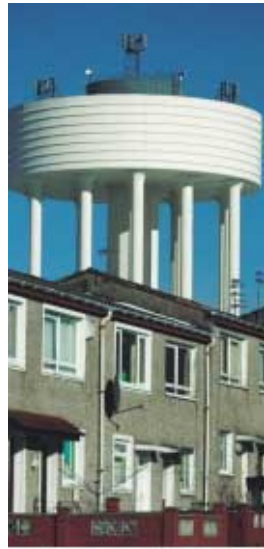
Siting issues

5.3 - Requirements placed by the Government upon telecommunications operators under the terms of their licences demand that a level of coverage is achieved by certain deadlines, which means that in effect the provision of facilities relates to geographical cells. The LPA must be realistic about technical requirements. The Council recognises that systems must be placed to serve concentrations of people, at home and at work, together with major transport corridors, and that the technical and operational requirements of the operator must be met. Operators should show that alternative sites within the area of search have been assessed and why less sensitive sites are not technically feasible.

5.4 - A common difficulty is that the equipment will require an elevated position in order to work effectively and masts and antennas require an operating height which allows their signals to clear trees and other obstructions, but such locations are likely to be prominent sites which cause visual impact or community concern. Where it is not possible to avoid an open or conspicuous location, sufficient land should be included within the site to allow a satisfactory amount of planting to screen the apparatus.

5.5 - The following general design principles should be regarded as important considerations:

- Proper assessment of the character of the area which can protect and enhance those positive features contributing to a sense of place or identify poor quality elements and seek to achieve discernible improvements;
- Design should be holistic and three dimensional showing an appreciation of context;
- Analysis of the near and far views of the proposal and to what extent these will be experienced by the public and any residents;
- Proposals should respect views in relation to existing landmarks and distant vistas;
- Proposals should seek to preserve the skyline and any roofscapes visible from streets and public spaces;
- The use of sustainable materials in the construction of the development; and
- The choice of complementary designs, materials and colours to produce a harmonious development and to minimise contrast between equipment and its surroundings.



Installations on existing buildings or structures

5.6 - The least sensitive locations for telecommunications developments include:

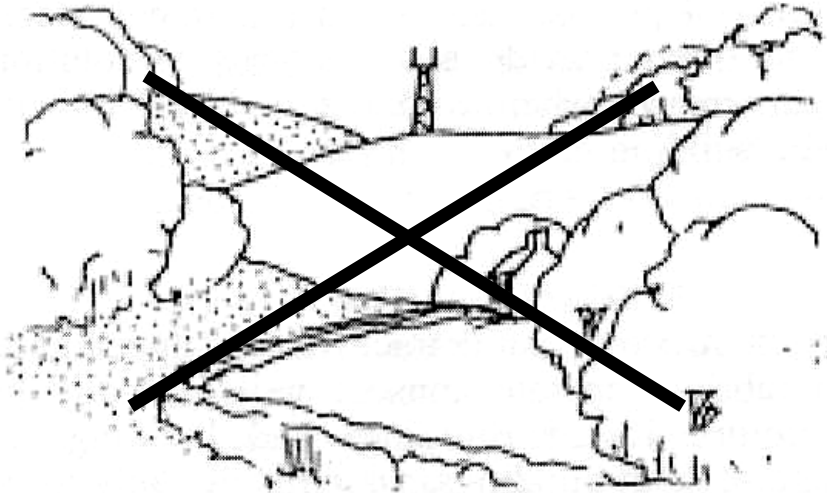
- Existing mast sites
- Tall buildings
- Screened buildings
- Street furniture
- Electricity pylons
- Within industrial estates and business parks
- Within or close to mature woodland

5.7 - The most sensitive locations include:

- Clwydian Range Area of Outstanding Natural Beauty
- Listed buildings
- Sites of Archaeological and Historic Interest
- Conservation Areas
- Historic Parks and Gardens
- Historic Landscapes
- SSSIs
- Wildlife sites
- Areas of open countryside and green barriers
- Grounds around schools, colleges and hospitals
- Residential areas

Avoid siting masts in open countryside

5.8 - In 2001 the mobile phone network operators published their Ten Commitments to best siting practice for new development, including improved dialogue and consultation with local communities. The latter includes annual rollout discussions, whereby operators share information with LPAs about their plans for the forthcoming year and LPAs provide feedback and general advice to help guide the operators' thinking and plans. These Commitments are listed in Appendix 2. It is the Government's intention to monitor progress on the application of the operators' commitments.



Design issues

5.9 - Where there is a need for a proposal on a particular site, the LPA will consider the suitability of the proposed design, including the treatment of ancillary development and landscaping. The options for design will be affected by the site conditions, technical constraints, landscape features and capacity requirements, and would include:

- Mast and/or site sharing.
- Installation on existing buildings and structures.
- Camouflaging or disguising equipment.
- Using small scale equipment.
- Erecting new ground based masts.

Masts

5.10 - Mast sharing should be considered as a means of reducing or eliminating the need for new masts, but sometimes it may necessitate an existing mast to be increased in height to accommodate more equipment, resulting in greater prominence. In such circumstances, two masts may be a better solution. Sometimes the structure may not be strong enough to take the increased load. Generally slim line poles are less intrusive than lattice towers, but in certain locations more innovative solutions may be sought to better blend the proposal into the local environment. Masts can be designed to resemble trees or street furniture such as lampposts, or on occasions incorporated unobtrusively on to buildings such as church towers, or in some locations suitably appear in the form of modern art works. Glass reinforced plastic (GRP) can be moulded into any shape and coloured appropriately.

Reducing visual impact



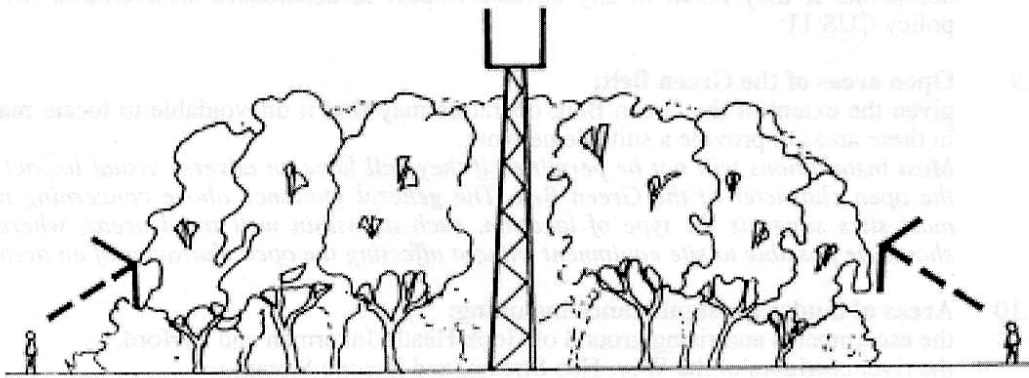
Tree masts

Masts as modern art

5.11 - On rooftops a mast or an array of antennas can be highly visible and may be unacceptable. Antennas placed below the roofline or attached to vertical surfaces such as chimney stacks may provide a less intrusive answer than those which break the skyline.

Where there is no alternative to a new ground based mast, its impact can be reduced by:

- Placing the mast near to similar structures, for example industrial and commercial premises, road signs and lampposts.
- Placing the mast within or close to an existing group of trees.
- Using simple and unfussy designs.
- Using appropriate colouring with a non-reflective finish. Against the sky this could be pale grey, in other urban locations darker hues of grey or brown may be appropriate or a colour similar to the building on which it is located. Against a wooded backdrop or in a rural location a matt green or brown scheme would be better, avoiding the brighter greens.



Mast largely obscured by existing trees

Security fencing

5.12 - This will need to be at least 2 metres high, and could therefore be conspicuous. It should be colour treated during manufacture by powder coating in black, dark green or dark blue. Chain link fencing is too insecure and easily vandalised.

Equipment cabins

5.13 - Equipment cabins, cable boxes and other structures should harmonise with their surroundings as much as possible, through the use of suitable materials and colours. Items to serve rooftop installations should be placed inside buildings or concealed by existing structures where possible.

Planting and landscaping

5.14 - Masts are too tall to be screened out but their impact can be softened. Utilising existing vegetation will help. Planting and landscaping can screen cabins and fencing. Operators should detail their proposals for landscape mitigation and explain responsibility for maintenance.

6 - Other aspects

Health considerations

6.1 - Mobile phones and their base stations transmit and receive signals using electromagnetic waves or fields (EMFs). Some EMFs occur naturally like the earth's magnetic field, but man-made sources such as electricity power lines, broadcasting transmitters and telecommunications base stations often give rise to public concern about possible health effects. Health considerations, and the public's perception of risk, can be material considerations in determining applications for planning permission and prior approval. However, PPW states that it is the Assembly's view that if the development meets the appropriate European Union guidelines from the International Commission on Non-Ionising Radiation Protection (ICNIRP) on the limitation of the exposure of the general public to electromagnetic fields, the LPA processing the application need not consider further the health aspects and concerns about them. All new base stations are expected to meet the ICNIRP guidelines. This follows the recommendations in the report of the Independent Expert Group on Mobile Phones (the Stewart Group), "Mobile Phones and Health", published in 2000.

6.2 - Whilst the Council fully appreciates that there may be genuine public concerns about the health implications of telecommunications development, it is not in a position to challenge these when processing an application for planning permission or prior approval if the submitted details show compliance with Government guidelines. LPAs should not implement their own precautionary policies such as imposing a ban or moratorium on new telecommunications development or by insisting on minimum distances between new and existing telecommunications development. The Council will expect all applications to provide a statement of self certification that the proposal meets the ICNIRP guidelines.

Radio interference with other electrical equipment

6.3 - Interference can be electrical or physical and only where there is clear evidence of significant and irremediable electrical interference will there generally be any justification for taking interference into account in determining a planning application.

Aerodrome

6.4 - UDP Policy AC12 explains that at Hawarden Airport (Airbus UK Ltd and Raytheon PLC) a safeguarding zone has been identified within which development proposals will be closely scrutinised to ensure that they would not affect the safe and efficient operation of the airport. Consultation will be carried out with the Civil Aviation Authority. In practice, where the proposed development is within 3 kilometres of the centre of the runway at Hawarden Airfield, the LPA consults the aerodrome operator, British Aerospace/ Airbus.

Need

6.5 - PPW advises that LPAs should not question the need for the proposed development, nor seek to prevent competition between different operators. Welsh Government urges operators and LPAs to carry out annual discussions about roll-out plans for each area. The need for masts is affected by customer usage, their size and the terrain.

Devaluation of property

6.6 - The possible devaluation of property arising from telecommunication development is not a planning consideration.

Loss of view

6.7 - Telecommunications developments can be very prominent. Loss of view for individual householders is not a material consideration in determining planning applications, but if the visual amenity of an area is likely to be adversely affected by a proposal this would be a planning concern, and the Council may seek to mitigate the impact by screening or landscaping or - if it cannot be made acceptable - refuse the application.

7 - Satellite antennas and small scale telecommunications developments

7.1 - With regard to small scale telecommunications, the Government has published free advice (which is available on the Council's website) entitled "A Householder's Planning Guide for the Installation of Satellite Television Dishes" (DETR/Welsh Office, 1998.) This publication explains the circumstances in which planning permission is and is not required, how to minimise the visual impact of installing a dish, how to choose a supplier and installer, and it outlines alternatives to individual dishes. Copies of the guide may be obtained from Planning Services, County Hall, Mold.

7.2 - The need for planning permission varies according to the type of property and its location, but listed building consent is always required for a satellite antenna or other equipment to be mounted on a listed building or on a building in the curtilage of a listed building. There are also additional restrictions in the county's 32 conservation areas. It is, therefore, always advisable to obtain advice before purchasing and siting a satellite dish. Contact one of the Planning Support Officers in the Development Control Section of Planning Services in County Hall, Mold (Telephone 01352 703234).

Appendix 1: The relevant Unitary Development Plan policies

AC12 Airport Safeguarding Zone

Development will not be permitted which would prejudice the safe and efficient operation of Hawarden Airport and RAF Sealand.

AC22 Location of Installations

Telecommunications installations will be permitted where:

- a. there is no reasonable possibility of sharing existing facilities or utilising suitable existing buildings or structures;
- b. satisfactory steps have been taken to minimise the visual impact both of the equipment itself and any associated infrastructure;
- c. they are available for use as a shared facility; and
- d. the proposals include adequate provision for the full restoration and aftercare of the site on any cessation of use.

Where such installations are proposed within or adjacent to the AONB, they will be permitted only if it can be demonstrated that there are no satisfactory alternative sites.

AC23 New Development and Interference with Telecommunication Signals

In all new development, steps must be taken to avoid causing unacceptable interference to existing telecommunication signals.

AC24 Cable Installation

In housing proposals over 10 units and in major retail, commercial and industrial developments, where appropriate, provision must be made for the installation of cables or ducts during the course of construction.

Appendix 2: The Operators' Ten Commitments

1. Develop, with other stakeholders, clear standards and procedures to deliver significantly improved consultation with local communities.
2. Participate in obligatory pre-rollout and pre-application consultation with local planning authorities.
3. Publish clear, transparent and accountable criteria and cross-industry agreement on site sharing, against which progress will be published regularly.
4. Establish professional development workshops on technological developments within telecommunications for local authority officers and elected members.
5. Deliver, with the Government, a database of information available to the public on radio base stations.
6. Assess all radio base stations for international (ICNIRP) compliance for public exposure, and produce a programme for ICNIRP compliance for all radio base stations as recommended by the Independent Expert Group on Mobile Phones.
7. Provide, as part of planning applications for radio base stations, a certification of compliance with ICNIRP public exposure guidelines.
8. Provide specific staff resources to respond to complaints and enquiries about base stations, within ten working days.
9. Begin financially supporting the Government's independent scientific research programme on mobile communications health issues.
10. Develop standard supporting documentation for all planning submissions whether full planning or prior approval.

Appendix 3

Supplementary Planning Guidance Note (SPGN) Public Consultation, (Dec 18th 2015 and Feb 12th 2016) comments and responses to SPGN No 11 Parking Standards.

Commenting Body / Individual	Comment	Response	Recommendation
No. 11 Parking Standards			
<p>Anwyl Construction Mike Pender.</p>	<p>Table 1 – C3 Dwellings</p> <p>There is no explanation/justification for the proposed Standard of 3 car spaces per unit for houses with greater than 3 bedrooms.</p> <p>This is excessive, does not equate with sustainable development and will unnecessarily increase development costs.</p> <p>Certain 4 bedroom houses provide quite reasonably one garage and 2 car spaces in front. But other 4 bedroom houses for a lower price meeting a different market, provide no garage but instead an 11.0m drive for 2 car spaces.</p> <p>This meets market demand and provides a sustainable inclusive mix of house types</p>	<p>The proposed standard for dwellings of more than 3 bedrooms of 3 car parking spaces is not changed from the previous LPG.</p> <p>Both policy AC18 and the SPG are clearly written in referencing the guidance in PPW which is for maximum parking standards to be applied in accordance with the principles of sustainable development. The specified standards are maximum parking standards and the requirement can be reduced depending on the specifics of each site and development. For instance if a site is in a sustainable location, close to public transport and where cycling and walking to facilities and services is convenient, then it will usually be appropriate for parking standards to be relaxed.</p>	<p>No change</p>
<p>CPRW</p>	<p>Reference should be made in para 2.2 to the North Wales Joint Local Transport Plan regarding information as to a detailed programme from 2015-2020 and a framework for schemes until 2030.</p>	<p>It is considered reasonable to update para 2.2 to reflect the most up to date local / regional transport policy.</p>	<p>Amend the first sentence of para 2.2 by adding after ‘... (2009)’ the words ‘ now updated by the</p>

			North Wales Joint Local Transport Plan'.
CPRW	In para 3.2 an explanation should be given as to why the private car will remain the principal form of transport, especially in rural areas, when national and local policies dictate otherwise with regard to new development.	The SPG centres on the application of Maximum Parking Standards, where parking provision in accessible urban areas, may be reduced given that there are alternatives to the private car i.e. walking, cycling and public transport. This is less the case in rural areas particularly given present budget pressures and the retention of bus services. Given that the purpose of the SP is to provide further guidance on the application of maximum parking standards it is not considered necessary for further justification of a simple statement to be made.	No change
CPRW	In para 4.2 consideration should be given to increasing the minimum width of parking bays from 2.4m to 2.5m due to the increasing popularity of large private cars for which standard bays are too small.	The parking standards in the SPG reflect those in the UDP. It is therefore not possible for the parking standards to be amended as this would, in effect, introduce new 'policy'.	No change