

Planning application S/4191/19/FL

**Erection of two new private rented residential blocks comprising a total of eighty studio, one and two bedroom apartments
(Resubmission of application S/0768/18/FL)**

**At: Western side of Land Parcel COM4, Neal Drive, Orchard Park, Cambridge
Objection by Orchard Park Community Council**

1. Introduction

Orchard Park Community Council object to this application and ask that if recommended for approval it is referred to committee. OPCC is willing to attend and speak at a committee meeting.

The community council urges you to reject both applications, neither are good for Orchard Park, they do nothing to aid what is already a fractured community, what is needed is low cost family accommodation. Orchard Park already has more Houses in Multiple Occupation (HMOs) than the rest of South Cambs combined.

This is largely an identical application to the previously rejected application S/0768/18/FL apart from the number of units being slightly reduced from 93 to 80 and the height and massing issues being less of an issue.

This is aimed at the private rented sector a market that may be in short supply within South Cambs but is certainly not within Orchard Park where some streets are over 90% all privately rented. There is no affordable housing being offered on the basis of viability. As the government makes clear a scheme not being viable is no reason to approve it when not policy compliant to such an extent as these applications.

This is a very small site. The application approved on appeal was for 42 one and two bedroom flats, which would have included an appropriate amount of affordable housing. The current proposal does not include any provision for affordable housing. Hence what is now proposed is nearly double that approved on appeal. If approved, this development would be dense and cramped.

As with the previously applications, Orchard Park Community Council respectfully asks South Cambridgeshire District Council to reject both this application and even more so the application for student rooms. Such dense development would not be permitted elsewhere in South Cambridgeshire so why should Orchard Park have to have such development.

If minded to approve, then before the application is determined revised plans should be required to address the various issues highlighted in this objection and by others.

A number of conditions are proposed as solutions but without clarity that what is to be conditioned could actually be delivered. Such matters should be demonstrated to be possible before approval.

The complete viability assessment should be publicly accessible for a sufficient time before any determination is made on this application. The complete viability assessment should be before the committee along with a review of it by an independent consultant. The independent consultant should be available to attend the committee and be able to answer questions. That the applicants have overpaid for the site is no justification for the lack of affordable housing.

The committee is urged to read the Inspector's decision, particularly paragraphs 14 to 18 and his rationale for approving the application he did and refusing the other one as well as the acceptance of the terms of the Unilateral Undertaking submitted by the then applicants.

Although this is a full application there is a lack of detailed plans such as showing the detailed car parking, cycle and pedestrian arrangements.

No evidence has been submitted to demonstrate that a car lift would work. A comparison may be drawn with rear courtyard parking. There is now clear evidence they do not work and people park as close as they can to their house. The same will apply here. There is not enough parking provided.

There is no point imposing conditions which cannot then be enforced, better to reject the applications now than create unsustainable communities.

If ultimately, you are minded to approve this application please defer consideration until all details of the s106 agreement and all the conditions are finalised and bring it back to committee for these to be considered.

2. Location Plan

The redline plan does not comply with the PPG requirements as it does not show all land required for the development.

In particular:

- The proposed boundary landscaping extends beyond the redline.
- The proposed pedestrian route to Chieftain Way goes outside the site boundary. (On to land owned by the Community Council)
- The access road from Neal Drive and the required visibility splay are not included within the redline.
- The redline includes land to the north of the site which does not appear to be in the applicant's ownership, but Certificate A has been completed stating all of the land required for the development is owned by the applicant.

3. Principle of Residential Development

Whilst the residential use of this site has potentially been established by the appeal decision on APP/W0530/W/15/3095195 (SCDC S/2975/14/OL) that is no justification for the current proposal which is of a very different scale.

It should also be noted that the linked appeal APP/W0530/W/15/3095195 (SCDC S/2938/14/OL) was refused for the erection of up to 132 1 and 2 bed flats on all of the COM4 site. A costs application against SCDC was refused on both appeals.

Both original refusals contained robust decisions and reasons for refusal. Many still apply and even more so given the greater scale of what is proposed.

The approval appeal decision in April 2016 was for "up to 42 1, 2, 3 and 4 bedroom apartments". It is now expired so should now be afforded less weight, particularly given the revised NPPF and NPPG as well as the recently adopted South Cambridgeshire Local Plan and the length of time since the appeal decision with no attempt made to implement that decision by such as by submission of a reserved matters application.

The applicants bought the site from the owners in full knowledge of the then extant planning consent. They made no effort to submit a reserved matters application for that development and allowed it to lapse.

The way the applications on this site have been submitted are classic examples of attempts to wear down opposition by Local Planning Authorities and communities by repeat application. OPCC ask the committee to take a robust approach and defend the existing residents of Orchard Park as well as those that would have to live in such cramped conditions as proposed in this application.

4. Is this Sustainable Development?

NPPF paragraph 7 states:

“The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”

Whilst at a simplistic level this development may be said to meet a need a present need for private rented property, it does so at the expense of unacceptable compromises.

NPPF paragraph 8 explains that:

“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways ...”

The three objectives being: Economic, Social and Environmental.

At a superficial level the proposed development may be said to meet the economic objective as detailed in 8(a) – but can it really be said that cramped nature of this proposal will *ensure “sufficient land of the right type in the right place at the right time”* or that it *“identifies and coordinated the provision of infrastructure”*?

The proposed development certainly does not meet either the Social or Environmental Objectives detailed in 8(b) and 8(c). It does not:

- support strong, vibrant and healthy communities
- foster a well-designed and safe built environment
- provide open spaces that reflect current and future needs
- contribute to protecting and enhancing our natural environment
- help to improve biodiversity

Whilst paragraph 9 makes clear the objectives are “not criteria against which every decision can or should be judged”, it goes on to say “Planning ... decisions should play an active role in guiding development towards sustainable solutions.

5. Viability and Affordable Housing

Current details on the public planning register do not include the viability assessment which we understand has been submitted to demonstrate why the development does not comply with the policy for affordable housing. As the proposal does not comply with the policy requirement for affordable housing the application should be rejected.

The viability assessment should be disclosed as required by the NPPF and NPPG but has not been. It should be able to be subjected to full public scrutiny.

OPCC urges committee members to request and review both the Viability Appraisal (VA) and the review of it commissioned from the District Valuer. If need be this could be a discussion in a closed session of the committee. The applicants asked SCDC to continue to refuse to place these in the public domain the Viability Assessment (VA) they submitted.

During consideration of the previous application after OPCC obtained legal advice which was passed on to then case officer, the applicant made contact and agreed to release the VA to OPCC on a confidential basis. It was accepted on that basis whilst also made clear it is for SCDC to determine if it is placed in the public domain or not – and that the NPPF and NPPG as well as ICO decision all point toward disclosure.

OPCC believe the VA should be in the public domain and there are no justifiable sound reasons why SCDC can justify not placing it in the public domain.

A previous case officer had said that a second review of the VA was to be commissioned but this has not actually been done for reasons that seem unclear. That the applicants have made the scheme appear even more unviable by including the unproven “car lift” is no justification for not commissioning a truly independent review of the VA. The District Valuer is rarely relied upon by other planning authorities for reviewing VAs submitted by applicants.

6. Density, Character and Appearance

This is over-development on a grand scale, in a site that is only 0.27 ha (gross). The proposal as approved at appeal for 42 units would have resulted in a net density of well over 190. The previous application was for 99 dwellings so a net density of around 450 dwellings per hectare. That proposal was reduced to 93 dwellings which slightly reducing the density to around 420 net. The current application for 80 unites would result in a density of around 360 net. This is still around double the density of the development approved on appeal.

The Orchard Park SPD provides guidance as to the built form likely to be considered acceptable within the COM4 area. It suggests built forms of approximately 15 metres in height (with four plus storeys) for primary blocks and between 9 and 12 metres for other buildings should be considered acceptable. In this area the SPD seeks provision of ‘landmark buildings’ to terminate views and strong frontages to define and contain open spaces and streets. What is proposed is not considered to meet the requirements of the SPD.

7. National Design Guide

MHCLG published the new National Design Guide on 1st October 2019 ‘Planning practice guidance for beautiful, enduring and successful places’.¹

The new guide builds on the NPPF and makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve.

¹ <https://www.gov.uk/government/publications/national-design-guide>

The focus of this guide is on good design in the planning system. It supports paragraph 130 of the NPPF which states that permission should be refused for development of poor design.

Comparing this proposed development against the ten characteristics in the Design Guide should lead to only one conclusion, that this application should be rejected.

8. Leisure, Recreation and Amenity Space

The proposal results in a very cramped development. There is little or no private or public amenity space. There is no onsite provision for leisure or recreation space. Whilst the SCDC section 106 officer has indicated a level of provision that should be provided, at present there appear to be any offer of a proposed s106 contribution for off-site provision. On the basis it does not comply with these policy requirements it should be rejected.

9. Build to Rent

The proposal is based on the difference between South Cambridgeshire and Cambridge City, it fails to take account of the very different demographics in the two districts. Orchard Park already has more of the issues of Cambridge City but without the supporting infrastructure or services.

Orchard Park has a large number of houses in multiple occupation with what were meant to be family homes now converted to 6 or more HMO units. This is estimated to be around 25% of the total buildings. Many HMOs are uncontrolled in planning terms but immune now from any enforcement action.

The need for and benefit of HMO properties is recognised but they should never dominate any one street as they do in Orchard Park.

HMO properties will not generally be picked up in any Private Rented Sector survey. In several instances whole streets are largely or entirely HMOs. So, whilst the PRS within South Cambridgeshire as a whole may only have been 12% in 2014/15 that is for South Cambridgeshire as a whole. The PRS within Orchard Park is well in excess of 20% - bear in mind that a 6-bedroom HMO should be counted as 6 PRS units.

Orchard Park is already suffering from the issues that flow from a high transient population, that this application makes the case on the lines of "we will be different as we will be high quality and well managed" it will still exacerbate not improve the situation.

10. Transport Statement

Whilst what purports to be a fresh Transport Statement has been submitted dated November 2019, the parking survey was undertaken in May 2018.

The submissions from the applicant's transport consultants appears to be fairly poor but seems to have been accepted by the County Council without much challenge. For example, making use of the 2011 census for anything in Orchard Park is foolish at best given much of Orchard Park did not exist then! The parking stress survey submitted is said to comply with the "industry standard" Lambeth methodology, however OPCC checked with LB Lambeth shortly before the committee meeting that considered the previous application and their head of transport policy said there are

multiple ways in which the survey does not comply and has significantly over counted the available parking.

Despite the clear requirement in the NPPF to maximize walking and cycling these aspects get little genuine consideration within the Transport Statement. What consideration there is makes use of inaccurate claims.

For example, in paragraph 2.8.2 it is said “Beyond the commercial and retail facilities there is a new primary school [it is not new] in the western part of Orchard Park some 400m distant on foot.” Measured as a straight line it is 500m, as a walking route it is around 650 m.

Use of data from Census area Cambridge MSOA 002 is entirely inappropriate as it is a very different area, much is very close to the city centre and subject to parking controls. Figures may be presented to demonstrate there is no issue with parking – but the reality on the ground is that there are significant parking problems within Orchard Park already which will only be made worse by the proposed development.

Paragraphs 3.4.1 to 3.4.3 quote from the Ely to Cambridge Transport Study and attempt to make a case that “*It follows therefore that any undeveloped parts of Orchard Park should adhere to the principles set out in Para 2.8.5 of the ECTS*”. However, the claims are not backed up by the ECTS paragraph quoted below. It is clear that Orchard Park was not developed with sufficient overall oversight of car parking provision and management and what is proposed in the ECTS is not something that can be implemented on one extremely small site in total isolation.

From ECTS paragraph quoted in Transport Assessment [emphasis added]:

“To avoid the problematic impacts described above in this document, development must in future seek very carefully to:

- ***minimise external vehicle trip generation through maximising trip internalisation;***
- ***provide significantly lower levels of car parking than has traditionally been provided, particularly at employment locations;***
- ***promote a site-wide approach to car parking management to reduce the need for significant increases in car parking provision; and***
- ***promote the use of non-car modes through significant investment in supply-side measures and aggressive travel planning to encourage the required mode shift.***

The planning and transport authorities should also ensure that processes for monitoring, managing, and reviewing transport outcomes are implemented and secured by and from developers through the consenting process.”

At least the ECTS study is fairly recent, even more bizarrely the Transport Statement refers in paragraphs 3.5.1 to 3.5.5 to a “Personalised Travel Planning Pilot Project” carried out in early 2009 when only a small part of Orchard Park was built out. As this project was so long ago and has not been repeated little value can be drawn from it now.

In 3.5.5 the Transport Statement concluded that “*It can reasonably be considered that the pilot PTP shows the propensity for people to change their travel habits particularly where there is a sufficiently high level of provision for travel by modes*

other than the private car as exists at Orchard Park.” Unfortunately, there are two fundamental flaws with this, firstly there is not a “sufficiently high level of provision for travel by other than the private car” and more importantly even when someone may well walk, cycle or use the bus to get to/from work, they will still have a car for use at other times so require a parking space for it. This is highly likely to be the main reason why there is a high level of day-time parking in much of Orchard Park now.

The Transport Statement states that “Section 8 summarises the Transport Statement and concludes that there will not be a severe impact due to the Proposed Development.” This reveals a lack of consideration of the revised NPPF issued in July 2018, but instead the 2012 NPPF. For a useful review and explanation of the differences between 2012 and 2018 editions of the NPPF, see paper by PJA (Phil Jones Associates) at Annex 1.

The current NPPF issued in February 2019 reflects the change of wording in 2018 and emphasis on Highway Safety.

Ultimately, the decision on highways matters is one for SCDC not the Highways Authority.

11. Service Access

In paragraph 4.6.1 is an attempt to make a case for use of the hammerhead to Neal Drive and that this means “that servicing vehicles, including refuse vehicles, will not cause any obstructions when stopped on the highway outside the Proposed Development”. This totally ignores the proposed development on the other side of Neal Drive. The development should ensure that all of its’ servicing needs are dealt with within the site and not by use of Neal Drive.

12. Crime Prevention - parking

When commenting on the previous application the Police “Designing Out Crime Officer” expressed concerns and refers to “anti-social and inappropriate parking across the Orchard Park area and regularly calls are received to our Control Room.”

If anything, the situation on parking is now worse since those comments were made with vehicles regularly being “parked” on pavements and even roundabouts as can easily be seen every evening and often during the day as well.

13. Parking

Orchard Park has reasonably good accessibility by public transport and cycling. So, whilst someone may be able to commute to work on foot, by cycle on by bus they still will often have a car for other journeys such as leisure and shopping. This is demonstrated by observing the number of cars parked within Orchard Park during the day. Any committee members unfamiliar with the parking situation in Orchard Park is urged to visit Orchard Park on a weekday evening before determining the application.

The parking survey was undertaken in May 2018 which is before the “Marmalade Lane” (K1) development was completed.

In our objection to the previous application we said:

“Whilst a parking stress survey has been submitted which is said to be in accordance with the Lambeth Methodology² even a cursory read of the methodology shows the submitted survey does not. It is clear the submission clearly does not comply with the methodology in a number of ways including that it has not been based on a 200m walking distance. It has not properly identified and excluded around dropped kerbs, nor excluded 5m from junctions.” “

Despite this objection no attempt appears to have been made to undertake a fresh parking survey for this application.

Even if the applicants could control car ownership of tenants, they could not control the behaviour of visitors. Provision of double yellow lines would simply lead to parking on double yellow lines as happens at present with the existing restrictions. SCDC is one of the few districts in England which does not have decriminalised parking, so parking remains a police matter and giving other competing pressures so does not get dealt with. If the application is to be permitted then the applications should be required (through a Grampian condition and s106 agreement) to fund the introduction of decriminalised parking within either all of SCDC area of Orchard Park (whichever is the preference of County Council) as well TROs for parking restrictions on roads (and pavements) and funding an enforcement service for at least five years on a 24/7 basis to cover the area within a 600 m radius of the site.

There are two hotels within Orchard Park both of which were permitted as it is now clear, without sufficient parking for the number of guests they now accept or the sorts of vehicles some use (HGV, coaches). Even when there may be space with the car parks some chose to park on the street and/or pavement instead. This indicates how people behave, garage parking accessible by lifts will not be used as it should be. Given rear-courtyard parking has been demonstrated to not work, it is fallacious to suggest garage parking accessed by lift will work unless supported by a controlled parking zone and strong enforcement action.

The use of Census data to support contentions in the application is entirely inappropriate. The most recent Census in 2011 was carried out whilst Orchard Park was still being developed. The LSOA census area covering the site does not cover all of Orchard Park and includes areas not in Orchard Park. It is of no real use to assess the situation now. In the absence of other validated data on car ownership the standard parking requirements should be the minimum requirement.

14. Bus provision

The Transport Statement acknowledges that the distance from the site to bus stops on the Guided Busway are 750 m and 500 m and Citi 1 bus stop 550 m. These are all far in excess of the standard recommended maximum distance of 400 m. No mitigation measures are proposed to address this deficiency.

15. Cycle Parking

The comments made by CamCycle are endorsed. Whilst they have referred to Cambridge City policies the same principles ought to apply here. The use of two-tier

² https://www.lambeth.gov.uk/sites/default/files/pl-PARKING_SURVEY_GUIDANCE_NOTE_Nov_2012_Update.pdf

racks for residential cycle parking is inappropriate and some of the Sheffield stands have been placed too closely to walls. Two-tier cycle racks are neither accessible nor convenient for residents. Use of the Cycle Parking Guide SPD provided by the Cambridge City Council as a guide to appropriate layout is a sensible suggestion.

The cramped nature of the site and the efforts of the applicants to squeeze in so much development in such a small area has no doubt led to the proposed inappropriate cycle parking.

16. Highways Development Management

The Highways DM comments raised a number of issues that should be dealt with through revised plans before the application is determined. Whilst they suggest dealing with matters by use of conditions such conditions would be ineffective if what is required could not actually be implemented, hence revised plans should be submitted to demonstrate how the conditions could be complied with.

17. Pedestrian Access to Chieftain Way (toward Travelodge)

The Site Plan appears to show a narrow pedestrian/cycle route running from Neal Drive to Chieftain Way. As a concept this is supported and indeed considered necessary. The Planting Strategy Plan shows this as a Pedestrian Footpath and “Refer to Architects Information for detail” but it is unclear what this refers to.

This route extends outside the redline of the application as does the vehicle access to the site from Neal Drive, both should be within the redline.

As proposed, the pedestrian route appears very narrow as if it has been squeezed in and ought to provide for both a cycle and pedestrian access and so be of an appropriate width.

The pedestrian route overlaps with and conflicts with the visibility splay of the vehicle access point. Little thought appears to have been given as to how it interfaces with the car parking and access road.

The adjoining land off Chieftain Way that the route would go through is owned by Orchard Park Community Council (OPCC) but no notification has been served on OPCC.

18. Anglian Water

The response from Anglian Water dated 23rd April 2018 on the previous application made the point about a 15 m buffer zone around the pumping station. These comments have been repeated in their response of 11th December 2019 to the current application.

Given the multiple instances there have been of issues with the pumping station including sewage smells and their need to bring tankers in the concept of a buffer appears to be well made.

Given the ongoing issues with the pumping station there should be a clear buffer around the pumping station and the 15 m required by Anglian Water seems justified.

Whilst it has been said that “the Neal Drive/Orchard Park site infrastructure was built with allowances for all land parcels” this was at a stage when the whole of the COM4 site was to be commercial usage which would not have generated so much of a drainage requirement. Therefore, this aspect should be fully clarified before

determination and not simply assumed to be correct. Resident have already had to deal with sewage issues as detailed above.

19. Landscape Plans

These should be revised as requested by the SCDC Trees Officer.

In addition, it appears that the trees proposed on the southern boundary of the site are too close to the adjoining residential properties.

Different plans, such as the Site Plan, Block Plan and Planting Strategy Plan show different proposed boundary planting.

On all four sides of the site the proposed landscaping extends beyond the redline plan, no doubt as a result of the attempts to cram in much more development that is appropriate for the size of the site. All landscaping should be designed show it does not extend beyond the site boundary nor be likely to grow outside the site boundary in the future. Revised plans are therefore required to deal with this.

20. Ecology

The comments from the SCDC Ecology officer clearly indicate how superficial an approach has been taken by the applicants. A number of detailed suggestions are made such as:

“The landscape proposals provide very limited habitat for wildlife and are contrary to the ecological consultant’s recommendations in part. The proposals should be revised to take the comments below into account:

1) Boundary hedgerows should be managed for wildlife and should comprise native hedgerow mixes of 4-5 species of local provenance. In particular, native species should be used along the western boundary.

2) The northern boundary should include a buffer of native habitat including meadow habitat suitable for reptiles. Otherwise, the ecologist’s Recommendation 2 in the Reptile Survey report cannot be implemented.

3) Native and beneficial shrubs for wildlife should be used wherever possible.”

The points made should be dealt with through revised proposals before determination. It is clear that were these aspects to be controlled by condition they could not necessarily be implemented. The comments were submitted in December yet the applicants to not appear to have taken the opportunity to submit any revised plans.

National Planning Policy Framework (NPPF)

Transport Planning for Developments

PJA (Phil Jones Associates)

National Planning Policy Framework (NPPF)

Transport Planning for Developments

Key points:

- Transport Assessments, Transport Statements and Travel Plans still required.
- Sustainable transport still to be prioritised.
- Significant impacts must be mitigated to an acceptable degree.
- Highway safety now explicitly referenced as a reason for refusal.
- Severity test is now referenced in paragraph 109 and is limited to road network impacts.
- Application requirements strengthened through the removal of the *'where practical'* reference.
- Requirement for EV parking spaces strengthened.
- Still no definition of *'severe'*.

Summary:

The revised National Planning Policy Framework (NPPF 2018) was published on the 24th July 2018 to replace the previous NPPF published in 2012 (NPPF 2012).

The *'presumption in favour of sustainable development'* remains central to the document, for both plan-making and decision-taking. The requirement for developments which generate significant amounts of movement to be supported by a Transport Assessment or Transport Statement and Travel Plan also remains unchanged, although NPPF 2018 no longer refers to a Travel Plan as a *'key tool'* for facilitating the use of sustainable transport modes.

Paragraphs 108 to 110 of NPPF 2018 will be of particular importance to our clients, as they consider how planning decisions will be made in relation to transport. The content of these paragraphs is comparable to paragraph 32 of NPPF 2012, however paragraph 108 of NPPF 2018 states it must be ensured that:

'any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree'

This provides additional clarity compared to NPPF 2012 in that impacts on the transport network now explicitly relate to highway safety as well as capacity and congestion. However, it also introduces the concept that impacts must be mitigated to an ‘*acceptable degree*’, although this is not explicitly defined.

Further to this, NPPF 2018 paragraph 109 states that:

‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe’. (our underlining)

By comparison, NPPF 2012 stated that:

‘Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe’. (our underlining)

NPPF 2018 therefore now includes ‘highway safety’ as a reason for refusal and the severity test is now limited to impacts on the ‘road network’. It will be for Authorities and Inspectors to decide what constitutes an unacceptable or severe impact.

Further context regarding application requirements is provided in paragraph 110 of NPPF 2018. Whilst these provisions are similar to those in paragraph 35 of NPPF 2012, the reference to them being provided ‘*where practical*’ has been removed, suggesting an increased weight to these requirements.

Walking, cycling and public transport accessibility continue to be themes running through the documents, requiring priority to be given to pedestrian and cycle movements, as well as access to high quality public transport.

The concept that rural locations should be treated differently to urban locations in sustainable transport terms also continues to be recognised. NPPF 2018 states at paragraph 84 that in rural areas, sites to meet local needs may have to be found adjacent to or beyond existing settlements, in locations not well served by public transport. In these circumstances, it should be ensured that:

‘development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport)’

Both NPPF documents have very similar requirements for the setting of local parking standards, with the specific need to *'ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles'* (NPPF 2018 paragraph 105) replacing the more general need to *'reduce the use of high-emission vehicles'* (NPPF 2012 paragraph 39). NPPF 2018 also states that the importance of adequate overnight lorry parking facilities should be recognised, which was not a requirement of NPPF 2012.

Also in relation to parking, NPPF 2018 at paragraph 106 specifies that maximum parking standards should only be set when *'there is clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport'*.

Overall, the importance of sustainable modes, land use planning, parking provision and highways impact remains key to NPPF 2018. However, there has been a slight change in emphasis to the remit of the severity test with the inclusion of highway safety, but with other impacts restricted to those associated with the road network. There is still no definition however of what is classed to be 'severe', or indeed 'unacceptable'.