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05 January 2023

Dear Sir/Madam,

OHB046/AM

**RE: CONSULTATION RESPONSE FOR THE 'PARKING STANDARDS FOR NEW DEVELOPMENTS' SUPPLEMENTARY PLANNING DOCUMENT (SPD)**

We are pleased to submit these representations on behalf of O&H Strategic Land ('O&H') and in response to the ongoing consultation on the 'Parking Standards for New Developments' SPD (hereafter referred to as 'Parking SPD').

**Context**

O&H is a landowner and master developer for the strategic allocation within the Central Bedfordshire Local Plan known as the Marston Vale New Villages ('MVNV') or Marston Valley which comprises 565.5 ha of land. O&H has wider landholdings within Central Bedfordshire and Bedford Borough and as such is a key stakeholder and partner in securing appropriate parking provision for all types of new developments.

The Marston Valley site is a strategic allocation for approximately 5,000 new homes and 30 ha of employment uses within the Central Bedfordshire Local Plan 2021 – 2035 (the adopted Local Plan). It will also deliver education facilities and community hubs. The delivery of the Marston Valley development presents a major opportunity to make a meaningful and significant contribution to achieving the sustainability and modal shift objectives of the Parking SPD.

It is in this context that we provide our response to this consultation.

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**Principle of the SPD / Parking Standards**

The draft SPD follows the adopted Central Bedfordshire Local Plan and provides design guidance for new developments to supersede Central Bedfordshire Council's (CBC) Design Guide, Car Parking Strategy and the Cycle Parking Annex of the Local Transport Plan (as referenced in Policy T3).

O&H welcomes the Council's preparation of a consolidated SPD to guide future development towards more sustainable means of travel through the provision of appropriate parking spaces and typologies for different contexts and land uses.

Overall, O&H appreciates the well-considered and methodical approach reflected in the SPD's calculation of parking standards and the emphasis on effective user-oriented design. The latter point is particularly relevant since O&H's vision for Marston Valley emphasises the opportunity to create connected, accessible and liveable places for local communities through design-led placemaking.

The proposals for the Marston Valley development are set out within the outline planning application for the site as submitted in May 2018 and updated in March 2022 (CBC Ref: CB/18/01969/OUT). The proposal reflects Aim (IX) of the endorsed Marston Vale New Villages Development Brief ('MVNV DB') which commits to the creation of an appropriate car parking strategy for each phase of development. This will be consistent with the Council's adopted standards and relevant design guidance. These strategies will ensure that car parking is integrated within the proposed landscaping (without dominating the street scene), that all opportunities for shared parking provision are considered (e.g., Community Hubs) and that provision is made for electric vehicle and cycle parking in accordance with CBC's policies and standards.

It is intended that Marston Valley will promote high levels of walking / cycling and public transport use. Levels of car parking within the development should complement this objective by making it more attractive to walk or cycle for short journeys.

Once adopted, the SPD will become a material consideration for the preparation of future design codes for the Marston Valley development and the subsequent Reserved Matters Applications. In this context, it is critical that the SPD establishes standards which will support the delivery of the above shared vision for the development and that it is responsive to the specific requirements of strategic, multistage development which will be delivered over a substantial timeframe.

As it stands, the draft SPD applies a standardised approach to parking solutions through the application of minimum standards. This approach may not respond to the specific and complex needs of strategic-scale developments and the flexibility requirements for adopting design-led and bespoke parking solutions, as necessary, as part of a wider commitment to promoting walking, cycling and public transport as a practical priority for local trips.

The application of minimum parking standards across all developments in Central Bedfordshire may have unintended adverse consequences such as the over-provision of car parking spaces particularly for non-residential components of mixed-use strategic developments. This would clearly be counter to the wider objective of promoting sustainable transport options.

### ***Recommended Change***

It is recommended that the draft SPD should recognise the need for a bespoke and design-led approach to parking provision within strategic developments such as Marston Valley. As such, minimum parking standards should not apply.

O&H would encourage the Council to adopt a more flexible approach, such as that which has been successfully implemented in South Cambridgeshire. The parking standards within Figure 11 linked to Policy TI/3 (Parking Provision) of the South Cambridgeshire Local Plan are described as being indicative. The text of policy TI/3 is clear that:

*"Car parking provision should be provided through a design-led approach in accordance with the indicative standards set out in Figure 11. Cycle parking should be provided to at least the minimum standards set out in Figure 11"*

Policy TI/3 notes that car parking provision will take into consideration the site location, type and mix of used, car ownership levels, availability of local services, facilities and public transport to encourage innovative solutions to car parking, including shared spaces where the location and patterns of use permit. Extracts of Policy TI/3 and Figure 11 of the adopted South Cambridgeshire Local Plan are enclosed as Appendices A and B.

Overall, in contrast with the CBC proposal to set minimum car parking standards, it is considered that the approach applied in South Cambridgeshire is more responsive to the specific demands of strategic-scale development and allows for a form of development which reflects the principle of promoting walking, cycling and public transport by avoiding a risk of over provision of car parking within strategic development.

## **Other Comments**

### ***Cycle Parking***

Generally, O&H support the cycle parking standards since they are reasonably justified and are supported by robust evidence.

### ***Car Parking***

Whilst the focus on providing suitable cycle parking infrastructure is recognised, the draft SPD fails to provide sufficient justifications for some of the car parking standards proposed. This is considered un conducive to meeting the parking requirements for the local area and contrary to the following extracted statement from paragraph 4.1.2 of the draft SPD: *"Whilst sustainability is high on the Council's agenda and encouraging sustainable modes of travel is part of our target to reach carbon neutrality by 2030, reducing the number of parking spaces for new residential developments is unlikely to see a reduction in car ownership."*

Sections 4.3-4.4 of the draft SPD identify the parking typologies most and least effectively used. Garages, for example, are deemed unsuitable parking solutions since they are commonly repurposed for non-parking purposes. To that end, section 4.4.1 of the draft SPD states that double garages should only count as one car parking space. This, and similar stipulations / exemptions as set out in section 4.3.1, should be made clearer in the Tables' supporting text and in the relevant Appendices. Further, additional text should be added to confirm if garages are acceptable for cycle parking provision instead.

The car parking standard for HMOs (section 4.7) is set at 1 space per bedroom which is not only inconsistent with sustainability objectives, but also presents considerable challenges in delivering sufficient parking spaces overlooked by the house they serve.

Unlike all previous and subsequent sections, the car parking standards per use class of non-residential development do not correspond with any supporting text and are only set out in Table 8 (Minimum parking standards for non-residential developments (including operational parking standards)) of the draft SPD. For example, the proposed parking standards for B2/B8 uses (1 per 30sqm for the first 500sqm, plus 1 per 100sqm (for anything over 500sqm) is not supported by any supporting text providing reasoned justification. Additionally, the proposed 1 space per bedroom for the Hotel (C1) use is considered to be superfluous.

### ***Non-Standard Vehicles***

Table 8 sets out the operational parking standards for various land uses but is unusually vague with respect to the requirements for schools. Further clarification is sought for this.

Further justification is also sought for the disabled parking standards (Table 9 – Minimum number of disabled parking spaces at non-residential developments), to ensure that the ratios proposed are not arbitrarily set.

## **General Comments**

- **Photos and Images:** We support the use of good and bad practice example images for cycle provision in residential and non-residential contexts. However, it is considered that this should be more consistently used for vehicular parking, non-standard cycles and for HMOs' parking typologies. Further, in section 6.9, not all the 'well-designed' examples depict best practice of cycling provision so the images should either (1) be narrowed down to more relevant examples or (2) be split into a tiered system of 'best', 'good' and 'unacceptable' practice.
- **Parking Layouts Appendices:** The inclusion of various illustrative layouts for car and cycle parking (in both residential and non-residential contexts) is greatly appreciated and will facilitate the delivery of well-designed parking solutions. The consistent use of hyperlinks to the relevant Appendix(ces) within each section of the draft SPD is also supported.
- **Relaxed Parking Standards:** Appendices 4-15 of the draft SPD suggest areas where the parking standards are more relaxed due to proximity to train stations. We consider the proposed 500m buffer to be too simplistic since it overlooks inaccessible areas

around these stations. GIS analysis (driving time analysis, walking/cycling isochrones) should be used to understand areas with sufficient infrastructure to support relaxed parking standards.

We trust that the comments set out above are helpful and reflect the importance that O&H places upon supporting the Council to deliver exemplar outcomes through the provision of sustainable parking solutions in suitable locations.

The delivery of Marston Valley presents the opportunity to meet the requirements of the adopted Central Bedfordshire Local Plan in terms of overall on-site provision of vehicular and cycle parking. As reflected within the MVNV DB, the phased delivery of Marston Valley will accord with the Council's adopted parking standards and design guidance (as updated) in order to ensure that car parking is integrated with proposed landscaping and will serve the local community.

However, as currently proposed, the draft SPD does not include the requisite flexibility to allow for a design-led approach at MVNV's strategic scale. We are concerned that the proposed approach would preclude bespoke parking solutions for Community Hubs and would limit the delivery of:

- suitable levels of parking integrated within the landscape
- shared community use of the parking spaces with nearby buildings
- land for better placemaking purposes, rather than redundant parking spaces (which would have created a car-dominant street scene) – see below visual example (and appendices) of the impact of unnecessary parking provision (resulting from locally-set minimum parking standards).

**Figure 1:** Plan showing impact of unnecessary parking provision resulting from minimum parking standards



*Source: Extract of Figure 11 and Policy TI/3: Parking Provision from the South Cambridgeshire Local Plan*

We look forward to continuing to work with the Council to deliver sustainable communities with sufficient infrastructure to facilitate a genuine choice of travel.

Yours sincerely

[Redacted signature block]

ASSISTANT PLANNER

Email: [Redacted]

cc: [Redacted], O&H  
[Redacted], Varsity Town Planning

**Policy TI/3: Parking Provision**

1. Car parking provision should be provided through a design-led approach in accordance with the indicative standards set out in Figure 11. Cycle parking should be provided to at least the minimum standards set out in Figure 11.
2. Car parking provision will take into consideration the site location, type and mix of uses, car ownership levels, availability of local services, facilities and public transport, and highway and user safety issues, as well as ensuring appropriate parking for people with impaired mobility.<sup>1</sup>
3. The Council will encourage innovative solutions to car parking, including shared spaces where the location and patterns of use permit, and incorporation of measures such as car clubs and electric charging points.
4. Residential garages will only be counted towards car and cycle parking provision where they meet a minimum size requirement.<sup>2</sup>
5. All parking provision must be provided in a manner that accords with Policy HQ/1 and the developer must provide clear justification for the level and type of parking proposed in the Design and Access Statement and/or Travel Plan.

<sup>1</sup> Minimum levels of car parking for people with impaired mobility will be required in accordance with national guidance. Detailed advice on the provision and design of parking for disabled car users can be found in Traffic Advisory Leaflet 5/95 (Department for Transport (DfT)), *Inclusive Mobility: A Guide to Best Practice on Access to Pedestrians and Transport Infrastructure*, (DfT, 2005) and BS 8300: *Design of buildings and their approaches to meet the needs of disabled people Code of practice* (British Standards Institute, 2009).

<sup>2</sup> Minimum size of residential garage (or car port) should be 3.3m x 6m for a car, with an additional 1m at the end and/or 650-750mm at the side of a garage to park cycles.

**APPENDIX B**

**SOUTH CAMBRIDGESHIRE LOCAL PLAN FIGURE 11**

<b>Use Class / nature of activity</b>	<b>Indicative Car Parking Provision (gross floor area)</b>	<b>Minimum Cycle Parking Provision (gross floor area)</b>	<b>Notes</b>
<b>RETAIL AND FINANCIAL SERVICES</b>			
<b>A1: Retail</b> (food)	1 space per 14m <sup>2</sup>	1 space per 25m <sup>2</sup>	Most single shops need short stay parking in front of shop. Rear parking for longer stay / staff parking. Where on-site parking is not possible 1 space per 28m <sup>2</sup> sales area is a good average for increase in on-street parking demand in peak times.
<b>A1: Retail</b> (non-food)	1 space per 20m <sup>2</sup>	1 space per 25m <sup>2</sup>	
<b>A1: Retail warehouses</b>	1 space per 25m <sup>2</sup>	1 space per 25m <sup>2</sup>	
<b>A2: Financial and professional services</b>	1 space per 25m <sup>2</sup>	1 space per 30m <sup>2</sup>	
<b>FOOD AND DRINK</b>			
<b>A3: Restaurants, snack bars, cafes and roadside restaurants*</b>	1 space per 5m <sup>2</sup>	1 space per 10m <sup>2</sup>	*Roadside restaurants on trunk roads or other main roads, often attached to petrol stations.
<b>A3: Transport cafes</b>	2 lorry spaces per 3 seats		Essential all commercial vehicles can enter and leave the site in forward gear.
<b>A4: Pubs and bars</b>	1 space per 10m <sup>2</sup>	1 space per 20m <sup>2</sup>	
<b>A5: Takeaways</b> (hot food)	On merit	On merit	
<b>A: Sui Generis</b> (including retail warehouse clubs, laundrettes, amusement centres)	7 spaces per 10 employees	On merit	
<b>A: Sui Generis</b> (including shops selling / displaying motor vehicles, taxi / car hire business, petrol filling stations)	1 space per 45m <sup>2</sup> display area, 1 per staff, 1 per 35m <sup>2</sup> for motor service centre and 1 per 20m <sup>2</sup> retail floor area at petrol filling stations plus space for requirements of servicing.	On merit	
<b>BUSINESS</b>			
<b>B1: Business</b>	1 space per 25m <sup>2</sup> (under 2,500m <sup>2</sup> ) 1 space per 30m <sup>2</sup> (over 2,500m <sup>2</sup> )	1 space per 30m <sup>2</sup>	
<b>B2: General Industrial</b>	1 space per 50m <sup>2</sup>	1 space per 40m <sup>2</sup>	
<b>B8: Storage and Distribution</b>	1 space per 100m <sup>2</sup>	On merit	Provision should take account of duration of storage.
<b>COMMUNAL ACCOMMODATION</b>			
<b>C1: Hotels</b> (including hotels, boarding and guest houses)	13 spaces per 10 guest bedrooms	1 space per 2 members of staff working at the same time	Includes staff parking and allowance has been made for use of bars, restaurants and function rooms by the general public.
<b>C2: Residential Institutions</b> (hospitals)	1 space 4 staff plus 1 per 3 daily visitors	To be determined according to the needs of each proposal	
<b>C2: Residential Institutions</b> (nursing / convalescent homes)	1 space per residential staff plus 1 per 3 bed spaces	1 space per 2 staff working at the same time	
<b>C2: Residential Institutions</b>	On merit	On merit	

(residential schools and colleges)			
<b>C3: Residential Dwellings</b>	2 spaces per dwelling – 1 space to be allocated within the curtilage	1 space per bedroom	Additional provision may be needed for visitors, service vehicles and salesmen.
<b>COMMUNITY FACILITIES</b>			
<b>D1: Non-residential institutions</b> (pre-schools, crèches and nurseries)	1.5 spaces per 2 staff	1 space per 2 staff working at the same time	
<b>D1: Non-residential institutions</b> (primary & secondary schools)	1 space per 2 staff plus waiting facilities / 1.5 spaces per classroom	A rate of 30% for pupils over 5 and 60% for pupils over 12 years	
<b>D1: Non-residential institutions</b> (non-residential colleges)	1 space per 2 staff plus 1 space per 15 students	University development 100% for the number of pupils using the building at any one time	
<b>D1: Non-residential institutions</b> (health centres and clinics)	1 space per 2 staff plus 2 per consulting room	2 spaces per consulting room	
<b>D1: Non-residential institutions</b> (churches)	1 space per 4 seats or 1 per 8m <sup>2</sup>	1 space per 15m <sup>2</sup>	If site includes church hall, use D2 public assembly standard)
<b>D2: Assembly and Leisure</b> (places of public assembly including village halls and community centres)	1 space per 4 seats or 1 per 8m <sup>2</sup>	1 space per 3 seats	Facilities which serve a wider hinterland rather than a primary local function should be assessed on merit.
<b>D2: Assembly and Leisure</b> (cinemas / conferences)	1 space per 5 seats	1 space per 3 seats	
<b>D2: Assembly and Leisure</b> (leisure)	1 space per 22m <sup>2</sup> (over 1,000m <sup>2</sup> )	1 space per 25m <sup>2</sup> (net floor area) and for every 15 seats for spectators	