

5 January 2023



Planning Department
Central Bedfordshire Council
Priory House
Monks Walk
Chicksands
Bedfordshire
SG17 5TQ

E: [REDACTED]
DL: [REDACTED]

Ground Floor, Hawker House
5-6 Napier Court
Napier Road
Reading RG1 8BW
T: +44 (0) 118 952 0500
savills.com

Sent by email to: strategic.transport@centralbedfordshire.gov.uk

Dear Sir/Madam,

RESPONSE TO THE PARKING STANDARDS FOR NEW DEVELOPMENTS SPD (8 NOVEMBER 2022 TO 5 JANUARY 2023)

Savills is instructed by Arnold White Estates Ltd (AWEL) to submit representations in response to Central Bedfordshire Council's (CBCs) Parking Standards for New Developments SPD.

AWE have substantial landholdings within CBC's administrative boundary, principally being strategic urban extensions around Leighton Buzzard. A number of these sites benefit from outline planning permission with reserved matters for detailed consent forthcoming. Others are either live planning applications or being promoted for strategic scale development through the current review of the Local Plan.

The sites being delivered and proposed by AWE are at the forefront of high-quality, sustainable new communities that are operationally Net Zero Carbon with renewable energy parks, energy-efficient new homes, state-of-the-art employment spaces, EV charging, land for a new health hub and new community facilities for Leighton Buzzard, substantial public open spaces and a commitment to ground source heating networks.

Our response below is structured according to the sections of the Parking Standards for New Developments SPD. The headings and numbering refer to the numbering within the SPD. At this stage we have not commented on Sections 5.0-9.0 but reserve the right to comment in the future.

1.0 & 2.0 Introduction and Background

The vision set out within the consultation document focusses on pursuing sustainable development "through effective parking provision" via promoting a diverse range of transport choices, in-line with the Council's Sustainability Plan and commitment to tackling climate change.

AWEL welcome this approach, and in particular with regard to promoting carbon neutrality, tackling climate change and the promotion of active travel for new development sites. It is therefore considered that the



Council should take a 'joined-up' approach to walking/cycling, public transport and achieving the objectives of their Sustainability Plan.

Paragraph 1.2 of the consultation document confirms how there may be circumstances where development "*warrant[s] a relaxation to the standards*". This approach is supported as AWEL consider that the parking standards should be used as guidance, and therefore should be sufficiently flexible enough to be adapted on a site-by-site basis. For example, it is considered that schemes should not be restricted by the parking standards if they go "above and beyond" on alternative sustainable travel methods, adhering to CBC's Sustainability Plan and supporting its commitment to tackling climate change.

Section 2.0 of the consultation document highlights that CBC is predominantly a rural authority and there is still some reliance on the private car. Notwithstanding this, the consultation document states that "*More houses and more employment will result in more roads and more journeys, so it is important to ensure that this growth is delivered as sustainably as possible*". AWEL therefore consider that the Council should take a proactive approach to sustainable travel initiatives within the market towns and/or proposed new settlements, particularly as these are growth areas identified in the Local Plan where there may be more opportunity to promote sustainable travel to a greater degree.

In regard to CBC's approach to parking standards in proposed new settlements and strategic development sites, the approach outlined above is supported by paragraph 104 of the National Planning Policy Framework (NPPF – July 2021) which confirms that transport (including opportunities to promote walking/cycling, active travel and betterment of transport services and infrastructure) "*should be considered from the earliest stages of plan-making and development proposals*". As set out below, the provision of appropriate car parking in new development has significant implications in terms of land use and efficiency; it is therefore considered that early consideration of parking standards through the SPD will help support the extent of housing and growth required through the Local Plan to meet the Council's housing requirements. Further, sustainable travel is a nationwide issue and strategic development, in particular, should promote active travel initiatives where these can be situated around existing or proposed neighbourhood areas, in line with paragraph 105 of the NPPF.

3.0 Cycle Parking

Section 3.0 of the consultation document outlines the cycle parking standards for residential development in CBC.

As outlined above, AWEL support the promotion of active travel, including enabling sufficient provision of attractive footpaths and cycleways, bicycles, e-bikes and e-scooters (including hire and charging), as well as EV car hire facilitation, community EV charging points and 'on-demand' EV shuttle buses at busy periods in new development schemes.

It is however considered that where such initiatives are proposed in a development scheme, commensurately lower on-plot standards should be acceptable to allow for greater flexibility on a site-by-site basis. As a developer, AWEL considers that this will act as an incentive for applicants to consider sustainable transport initiatives in accordance with the Council's Sustainability Plan and help respond to its declared climate emergency.

It is also noted that some consumers may not demand and/or utilise bicycle parking in line with the Council's standards i.e. a lower amount of bicycle storage provision may be suitable in schemes with a high proportion of elderly people accommodation. AWEL also consider it unrealistic to assume that for larger properties (i.e. 4 and 5 bedroom houses) that each bedroom requires 1 bicycle space, as not all homeowners cycle and not all the bedrooms will be used as 'bedrooms' with some likely to become home offices or study spaces. As outlined in our response to Sections 1.0 and 2.0, it is therefore considered that the standards should be sufficiently flexible to ensure they appropriately respond to consumer demand and opportunities for the promotion of active travel through a 'sustainable/active travel-first' approach.

With regard to the storage of bicycles in garages, this is broadly supported. However, the proposed additional 1 metre driveway width to allow bicycle access seems excessive and is not an optimum use of space. It is considered that CBC should balance the need for additional driveway space against paragraph 119 of the NPPF which highlights the need to optimise the efficient use of land. Indeed, a sterilised strip for bicycle access is not an efficient use of space, especially when there are urban design alternatives to access bicycles along a side garden passage or through the internal route of a building/house.

In light of the need to ensure that a development is not car/cycle or parking/storage dominated, in line with paragraph 119 of the NPPF and Chapter 12 in 'Achieving well-designed places', AWEL would support opportunities for the provision of communal bicycle stores which would help consolidate more space to achieve other CBC policy requirements such as increased open space and biodiversity net gain. This is considered particularly pertinent for e-bikes as their charging equipment takes up more space and therefore it is easier to combine the equipment within a single sheltered area to create a central mobility hub for the community to use.

4.0 Car and Van Ownership in Central Bedfordshire

Section 4.0 of the consultation document outlines the car and van parking standards for residential development in CBC. Table 2 confirms that the majority of people (88%) in CBC own two cars or less. It is considered that the standards adopted by CBC should therefore reflect this level of car ownership in order to align as closely as possible with the current levels of car ownership. This approach would reflect the requirements of paragraph 107 of the NPPF, to take account of local car ownership levels when setting parking standards.

AWEL support CBC's strategy outlined in paragraph 4.2 of the consultation document that facilitates a joined-up approach between suitable parking provision and placemaking. Paragraph 4.2 confirms that CBC should "*consider the accessibility of the development, the type, mix and use of the development, the availability of and opportunities for public transport, local car ownership levels, and the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles*".

This approach seemingly promotes opportunities for active and sustainable travel and facilitates a flexibility of the standards to be applied on a site-by-site basis through negotiations with CBC Highways at early application stage (i.e. through a pre-application enquiry etc.). It is important to consider that paragraph 107 of the NPPF is the starting point for local planning authorities when setting new parking standards, and by working alongside CBC's Sustainability Plan and national guidance (such as paragraph 112 of the NPPF) it is considered that initiatives that serve to lower carbon emissions and prioritise pedestrian and cycle routes should be supported within CBC.

With regard to the residential parking provision and initiatives, which as set out under paragraph 4.3.1 of the consultation document are deemed to be inefficiently utilised, AWEL broadly agree with these statements. It is however noted that communal parking hubs can be well utilised when combined with active travel initiatives and EV/e-bike charging and therefore this list should not be binding, but rather act as a series of guidelines that could be adapted to accommodate site specific requirements where these forms of parking provision may be appropriate.

This approach is also considered pertinent for CBC's approach to on-street parking for allocated residential development where this does not take away from the street scene and meets other CBC and national policy requirements for creating well-designed places. In relation to EV charging, communal parking hubs are preferred due to the equipment required to support this type of travel. It is therefore considered that if EV charging is provided on-plot, these should be per house rather than per space, in accordance with Requirement S1 and Regulation 44D: Electric vehicle charging provisions for new residential buildings of the Building Regulations 2021.

Furthermore, AWEL consider that garages should also be considered, where they meet the minimum car parking space size requirements, to contribute towards the number of car parking spaces per dwelling in order to optimise the efficient use of land (as reiterated above and by paragraph 119 of the NPPF). The

need for greater parking provision should be weighed in the planning balance against the urban design impacts with regard to green/amenity space, house types and garden sizes, as well as other CBC policy requirements.

Appendices 16 and 17 of the consultation document confirms that parking bay dimensions are appropriate up to a width of 4.5m and a length of 6m for a single space (and extended to 5.2+m by 6.5m where a cycle locker is provided). AWEL consider both to be onerous requirements with such geometries leading to inefficient use of space. Indeed, such large areas provided for parking have the overall effect of reducing net densities across large scale developments, thus requiring more sites/increased land to accommodate a given housing target for the District. Further, an unintended practical effect of providing such wide areas for single car parking spaces is that they could potentially be used as 2 spaces for smaller cars, which would be entirely contrary to the Council's sustainability objectives.

On a related matter, we would recommend the SPD provide clarity on the minimum size standards for garages as we note that this is not included in the draft SPD.

The NPPF (paragraphs 125 and Chapter 12) supports an approach to developing "*beautiful and sustainable places*" with appropriate green spaces, buffer zones and tree-lined streets and it is a concern that the imposition of the proposed parking standards would detract from these important urban design considerations. One example is the requirement for visitor spaces at a ratio of 0.25 per dwelling: such spaces are often provided on-street and this level of provision has the potential to decrease the amount of street space available for tree planting, green areas etc and result in a car-dominated street scene. ..

In relation to Table 3 of the consultation document and in line with our response above, AWEL consider that the proposed car parking standards seem excessive for larger homes (particularly 4 and 5 bedroom properties) given the level of current car ownership in CBC. Paragraph 4.5.2 of the consultation document refers to the need to create a 3rd and 4th car parking space but considers that these do not have to be formally constructed when handed over to the homeowner. There is a concern that this will not work in practice as it will lead to households converting front garden land into hard standing to create the 3rd and 4th parking space, resulting in large areas of hard standing with limited open or green space. Again, this would be contrary to the NPPF and CBC policies that seek to deliver well-designed street scenes, the promotion of green spaces in new development and the objective of increasing resilience to climate change.

There is therefore a risk that parking areas that conform to such standards could subsequently be remodelled by owners to provide additional parking beyond that intended at the application stage. AWEL consider that with the parking standards being a minimum standard, this would not be discouraged.

Instead, as set out above, we consider that CBC should take a proactive approach in supporting sustainable travel and should consider the car parking needs of developments on a site-by-site basis and weighed against other policy requirements of the CBC Local Plan and national guidance. This will ensure that new development sites are not dominated by car parking whilst ensuring that applicants justify the amount of parking for a given development site in light of other sustainable transport initiatives such as active travel, sustainable public transport initiatives, car sharing and EV charging. AWEL therefore consider that Table 4, which currently sets out the proposed parking standards for town centre developments, is more reflective of car ownership levels in CBC.

Lastly, paragraph 4.9 of the consultation document refers to car-free developments and how these should be encouraged in certain circumstances. AWEL welcomes the approach where car-free developments can be sufficiently supported by public transport, walking/cycling networks and active travel practices. However, AWEL consider that the SPD guidance seems overly restrictive and does not align with CBC's sustainability initiatives set out in Sections 1.0 and 2.0 when considering strategic development sites.

Appendices 4-15 of the consultation document refers to a reduced parking standard for sites within 500m of a railway. This is considered far too low: a 800m radius is considered the norm for the application of reduced parking standards near railway stations, as this represents only a 10 minute average walk time.

Therefore, a zone of at least 800m should be referred to in the final SPD. Furthermore, similar radii should be applied to other sustainable transport corridors/hubs, for example on sites which are located close to existing or proposed bus services that are regular and frequent. Such zones of lower parking standards should then be expanded outwards from the transport corridor/hub, with a variable percentage reduction in parking provision permissible within these zones based on distance to stations.

AWEL would therefore support the Council in relaxing the criteria for the provision of car-free developments – especially for strategic development schemes that provide opportunities to improve the existing infrastructure to facilitate sustainable travel initiatives.

Conclusion

In conclusion, it is the view of AWEL that a ‘sustainable travel-first’ approach should be adopted by CBC in light of their adopted Sustainability Plan and national government guidance. This will help support the provision of more active travel with reduced reliance on the car as well as assisting in the transition from fossil fuel to more renewable energy sources through the provision of more EV public transport, EV charging, facilitation of EV car clubs, e-bike initiatives and e-cargo schemes.

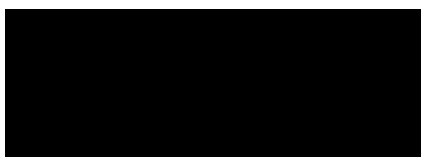
It is considered that CBC should allow for sufficient flexibility of their standards, where there is a clear sustainable travel case, to allow for suitable transport schemes to come forward in light of the current climate emergency. AWEL consider that the proposed parking standards, as currently set out within the consultation document, are onerous and do not align with CBC’s Sustainability Plan and/or the direction of travel for sustainable transport as outlined in the NPPF.

Notwithstanding this, applying strict guidance on parking standards retrospectively runs the risk of inefficient delivery of existing Local Plan allocations as these sites may not be able to deliver the quantum of development required, resulting in CBC not being able to meet their housing delivery targets.

We hope that our comments are helpful in informing the Parking Standards for New Developments SPD.

We also wish to continue contributing towards any future stages of the Local Plan process and therefore would be grateful if the Council could advise us of any further opportunities for participation and submission of representations.

Yours faithfully




Associate Director