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20718/A3/OG/sl
5th January 2023

Dear Sir/Madam,

**CENTRAL BEDFORDSHIRE COUNCIL PARKING STANDARDS FOR NEW DEVELOPMENTS
SPD – CONSULTATION RESPONSE ON BEHALF OF HOUGHTON REGIS MANAGEMENT
COMPANY (HRMC)**

Central Bedfordshire Council ('CBC') is consulting on the Draft Parking Standards for New Development SPD. The documents are being presented for consultation during an eight-week period between 8 November 2022 and 5 January 2023. The document covers cycle parking, car parking, disabled parking, powered two-wheeler parking and operational parking requirements. As well as the number of parking spaces required for new developments in both residential and commercial settings. The draft incorporates both proposed amendments to technical standards and includes changes to the way in which schemes are designed (including space standards for parking) which will have a significant impact on the way on which development schemes look and feel. In our view these changes may not represent a positive design shift.

We have reviewed the Draft SPD on behalf of HRMC, who are bringing forward the Linmere development scheme in Houghton Regis. The HRMC team is actively involved in discussions with CBC Officers across several teams about several submissions which are being considered by the Council at this time – including advanced infrastructure, Area Masterplans, reserved matters submissions and other discharge of condition submissions. In addition, we have been engaged in discussions with the Highways team at CBC about the importance of placemaking in delivering a sustainable development scheme which prioritises pedestrians and cyclists over motorised vehicles through positive urban design and good street layouts. Your Urban Design adviser [REDACTED] has also been engaged in those discussions. We are happy to share some of the feedback from those discussions with you. We have also recently undertaken a Building for Healthier Life audit at Linmere – the results of which has been shared with CBC Officers – and some of the conclusions of that audit

support our focus on good placemaking, prioritisation of pedestrians and cyclists and improved streetscape design.

With that context in mind, we would comment as follows:

Overarching Comments

Current guidance from Homes England aims to ensure that adopted Highways are first and foremost places for people, which achieve wider benefits such as spaces in which people use to socialise and play, provide better public health, deliver enhanced biodiversity, reduce carbon emissions, improve water quality and slow run-off.

We note that within the Guidance documents listed at the front of the document, there is no reference to documentation which covers the broader remits which underpin the creation of good places and well-designed urban environments. The document makes no reference to Building for Healthy Life ('BfHL'), National Model Design Code, PPG13, Streets for a Healthy Life ('SfHL') or the Manual for Streets ('MfS'). A revised MfS is currently being prepared, of which both BfHL and SfHL guidance are to inform the outcome. While the MfS is being revised, Homes England are using BfHL and SfHL guidance when working with local authorities and developers to assess the quality of the design outcome in new developments. Therefore, reference should be made to all of these documents to ensure a balanced approach between technical highways design considerations and the placemaking agenda coming from government in these guidance documents.

In order to ensure that all aspects of design are covered within the design of new streets, the SfHL has five key principle street functions, which are derived from the MfS:

- Place
- Movement
- Access
- Parking
- Drainage Utilities and street Lighting

We are aware that CBC are also reviewing and updating their Urban Design Guidance (UDG), however there doesn't appear to have been any collaboration between the UDG and the recently published SPD. Furthermore, we understand that Jason Yates has not been consulted in respect of the draft SPD, or indeed whether any of the standards are in conflict with the UDG that is currently being revised. Given the impact of car parking and parking standards on the outcome of places, we would have expected a more integrated and collaborative approach to be taken. Hence, the documents should not be developed in isolation of each other.

We would like to see the UDG, and this SPD being developed collaboratively and published in tandem, in order to ensure cross reference and the furthering of good placemaking within CBC.

On this basis, it is our view that the draft SPD has not adequately consulted the relevant parties, necessary to ensure the future guidance for CBC is progressive and ensures that good places are created for all future residents.

The 2019 Housing Design Audit for England found 'the least successful design elements nationally relate to overly engineered highways. These problems led to unattractive and unfriendly environments dominated by large areas of hard surfaces (tarmac or brick pavements), parked cars and bins.'

Furthermore, the report of the Building Better, Building Beautiful Commission commented that '*overly car-dominated places tend to be less attractive or popular places in which to spend time*'. The Commission called for '*more visual and measured detail and clarity and prescription ... on street*

layout for different street types such as tree lined avenues, lanes, courtyards, squares, variable width streets and other typologies.'

Should the current draft SPD be adopted, we believe that it would be in direct conflict with such guidance.

Central Bedfordshire Council unanimously supported a proposal to prioritise responding to climate change in July 2019. Section 1.0 Introduction sets out CBC's commitment to achieving Carbon Neutrality by 2030, of which it is stated '*active travel and shared transport are promoted within the plan over private car use*'. However, the draft SPD is in direct opposition to this pledge, with technical specifications which create over-engineered and car dominant developments. This is diametrically opposed to tackling the Climate Emergency that the Council has highlighted, current trends and government policy seek to move away from a car dominated society.

The document advocates for improved prominence of cycle parking with provision of secure storage and easier access at the front of properties which is positive, and something that HRMC are supportive of. However, no adjustment has been made to the level of car parking required by dwelling bed numbers or visitor parking (*Section 4.5 Table 3*). If car parking standards were reduced this would require less space for parking at the front of properties, which would:

- a. Result in the delivery of better integrated provision of cycle parking;
- b. Allow more space for landscape and less vehicular dominance along the street; and
- c. Incentivise the use of cycling as a preferred mode of travel.

We note there is a lack of innovative forward-thinking in relation to parking typologies. There is no guidance provided on the use of parking courts as a typology, which can be used to address the dominance of car parking within the public domain, or the use of car hubs (centralised parking) which can be shared between residents and visitors. This allows greater flexibility and potential to repurpose these parking space should the demand or need for car parking reduce over time as reliance on car use reduces. This would allow the space to be reclaimed for uses such as public space, enhanced landscape and tree planting.

Shared parking is more efficient in terms of land utilisation and can accommodate the lifecycle of homes as car ownership fluctuates through families. There is a lower ownership of cars in families with young children, which increase as the children become older teenagers and then reduces again once the children leave home.

We suggest that different tenures and the level of private car ownership is taken into account throughout the SPD. As such build to rent may have a lower level of private car ownership, due to the demographic of end user's comparative to private market housing.

We raise a general concern over proposals that indicate up to 4 parking spaces per plot. This would significantly impact on the street scene and create vehicular dominance along streets.

Significant concern is also raised regarding the compatibility of parking examples illustrated in the document, and the knock-on impact on the viability of delivery by developers. The cumulative widths indicated to achieve car parking in front of dwellings (7.5m) is greater than the typical width of a dwelling (5-5.5m for a 2-bed terrace and 3 bed townhouses, which reflect a significant number of units in schemes such as Linmere). These requirements are likely to be unacceptable to developers and call into question the number of dwellings which can be delivered on sites as a result.

Detailed Comments

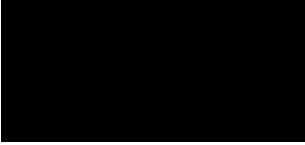
- i. *Section 1.0* - We acknowledge the document refers to a relaxation to standards in special circumstances for some development however, the document does not stipulate what specific

- features would warrant the designation of special circumstances, hence we would suggest that the above points are relevant to all development.
- ii. *Section 3.1* – Visitor parking at every house, while a good aspiration, will be difficult to achieve in practice.
 - iii. *Section 3.3* – We disagree with bullet point 5, garden sheds should count towards cycle parking, we suggest that some specification is provided on garden sheds which count towards cycle parking. If this is to be acceptable, it is likely that it will be the developer’s responsibility to provide these structures. Bullet point 6 sets out that garages can be used as cycle parking and sets out detail for width if it is to accommodate a car as well. We want to see specification for domestic garden sheds that would make them suitable for cycle parking as well as storage.
 - iv. *Section 3.6* – It is our opinion that some of the built examples provided are not great examples of appropriate cycle parking and would recommend further narrative be added to define the context where the proposed solutions would or wouldn’t be acceptable.
 - v. *Section 4.4.1* – Is the removal of garages as countable parking spaces (with appropriate size standards) the best way to reduce car dominance. This is a case where more joined up thinking could be applied. For e.g., provide standards which require greater storage in dwellings/garden sheds to reduce pressure on garages being used for storage rather than parking. While the June 2022 Travel Survey shows that only 14% of Central Beds residents use their garage to park a car. Nationally the RAC say that about 40% regularly put the car in the garage.
 - vi. *Section 4.3.2* – Some of the unacceptable parking examples illustrated in the document could be as a direct result of CBC highways design standards- this brings into question the standards themselves e.g., 8.8m width for Shared Surface streets which often result in ad hoc and indiscriminate car parking due to the availability of space in which to park a car
 - vii. *Section 4.4 (3rd bullet point)* – Reference is made to soft landscaping not being permitted adjacent to a parking space. We don’t agree with this statement, as the use of soft landscape is helpful in softening the visual impact of parking along a street. Additionally, some examples in the document illustrate soft landscape next to parking so there is a contradiction in this statement. This statement is also made in *section 4.4.7 5th bullet point*.
 - viii. *Section 4.4.2* - We believe that rear parking courts should not be so blanket approach discouraged. Rear Parking Courts can be done positively, with good surveillance and a through path/route, they can be an effective and good solution. We suggest CBC reframe this with specific circumstances in which rear parking courts are acceptable, such as with surveillance and a pathway through. This is a positive as it takes cars away from the front of properties.
 - ix. *Section 4.4.5* - It is recommended in the review that where communal parking is proposed for flatted developments, a minimum of one parking space is allocated to each property. This would remove the ability to make use of spaces where the property owner does not own a car.
 - x. *Section 4.5* - The parking standard for 4 bed terrace and apartments has increased from 2 to 3 spaces and 4+ beds now need 4 spaces. There is no reference to unallocated residents spaces on street however, third and/or fourth parking space(s) may be provided on accessible land that could be converted to parking by the homeowner. Increasing car parking contradicts CBC sustainable transport policies.
 - xi. *Section 4.5.1* – Reference made to visitor spaces to be evenly distributed as best as possible through the proposed development apart from where the communal parking is provided such as for apartments. We question the ability of the to be achieved in practise, in our experience, from the schemes delivered to date, housebuilders have struggled to achieve this due to the parking standards required.
 - xii. *Section 4.6 (table 4)* - Visitor parking spaces not required where public car parking is available within walking distance. We would like clarification on what is defined as public car parking and the acceptable walking distance referred to. Is this standard applicable for Local Centres, Supermarkets?

- xiii. *Section 4.8* – The minimum number of parking spaces for accommodation aimed at older people is 1 per bedroom for residents. Does this include sheltered housing, assisted living complexes and any other housing aimed specifically for older people. We would recommend a lower standard for care homes.
- xiv. *Section 4.9* – We are supportive of the points made within this section; however, the general document appears to not apply the principles stated. The SPD does not find a middle ground between ‘car free development’ and ‘business as usual’. In order for good places to be created, the middle ground between the two approaches must be found.
- xv. *Appendix 18* - On side-by-side parking space the overall dimension required based on additional 1m around the car is 7m wide by 6m deep. This overall width would not fit within a standard 2-3 bed property. This could have implications on plot efficiency and developer viability.
- xvi. *Appendix 19* - This arrangement seems to be only for wide-fronted smaller units (requirement of 2 spaces) which do not come as standard, especially 2 beds.
- xvii. *Appendix 20* - The space between buildings will be widened to 4.5m which will have significant impact on viability and efficiency of plots.
- xviii. *Appendix 21* - Larger house types with rooms above garages in semi-detached formation will have to have their garages converted into carports and the space between buildings widened to 8m which will result in reducing the width of the units and increasing their height. Is the 1m middle strip necessary? Same as Appendix 20, this will also have significant impact on viability and efficiency of plots
- xix. *Appendix 22* - This arrangement encourages parking in front gardens, as it is more convenient, and will therefore result in car dominance along the street.
- xx. *Appendix 23, 24, 25* - These arrangements also encourage parking in front of the property, as the space is provided, especially if it is grassed. This will result in overcrowding the fronts of properties with 3 or 4 cars.
- xxi. *Appendix 26, 27* - Provision of charging point for frontage parking is welcomed and a good addition to the standards, however we question the requirement of an additional 1m of space - 1.2m width is proposed in Appendix 19. Could this not be provided within the same soft landscape strip as trees?
- xxii. *Appendix 26* - Inclusion of an access point at regular intervals through frontage parking is a good addition, however we don’t think a 2m width is necessary- 1.2m would be sufficient to provide access and would be more compatible with a typical width of a parking module.
- xxiii. *Appendix 26* - The rationale for increasing the width of perpendicular frontage parking from 2.5m to 2.7m is unjustified in our opinion. This will result in the requirement for additional hard standing for parking at the front of properties which will increase car dominance in the public domain and increase areas of apartment parking courts. The standard bay size within the MfS is 2.4m.
- xxiv. *Appendix 26* - Incorporation of trees and landscape to break up perpendicular and parallel parking is supported; however, we are concerned that the frequency of every 4 spaces will be difficult to achieve in practice with respect to widths of dwelling frontages and parking standards.
- xxv. *Appendix 27* – Would like clarity on whether CBC are adopting pedestrian walkways. If so, can the carriageway width be reduced from 8.8m to 6m, as there is no evidence for carriageway widths greater than 6m. This would have a positive impact on the overall street scene.
- xxvi. *Appendix 30* - Appendix 30 non-residential parking bays have 2.5m width and trees every 6 spaces, these standards are for narrower bays and fewer trees than is generally required for non-residential.

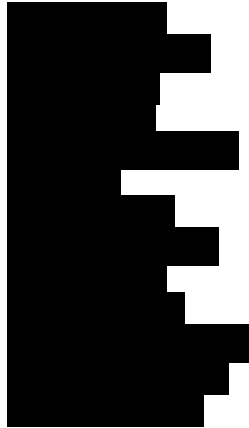
We are happy to meet with the Strategic Transport team to further discuss the comments set out above. Please keep us updated with all future stages of the development of the draft SPD.

Your faithfully,



Planner

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- Land Improvements Holdings
- Land Improvements Holdings
- Land Improvements Holdings
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