

Response to consultation on Central Bedfordshire Council Car Parking SPD

Combined response on behalf of:

DLA Town
Planning

Bellway

McBains

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www.dlatownplanning.co.uk

CBC Parking SPD consultation response

The document appears to be a highway guide rather than a planning guide. As such, it is not clear how the planning officers will balance competing demands and enable compliance with the proposed parking standards whilst also requiring appropriate landscaping, biodiversity net gain, high quality development, street trees, surface water management etc. The draft SPD doesn't suggest that there are other matters which could influence layouts and parking arrangements, such as those aforementioned; only focussing on technical highway matters.

The following points are for consideration:

Cycle parking for residents

The SPD suggests this should be to the front of the dwelling, primarily for ease of access. This may not be in line with good design approaches and has been objected to on a current planning application (CB/22/03949/RM). A cycle store similar to that shown on page 15 is proposed in the referred to application but has attracted objection from both highways and design officers.

As the majority of new housing developments tend to be of a traditional design approach, cycle parking to the front of a traditionally designed dwelling is unlikely to be acceptable in design terms, jarring in approach.

The document does not consider that sheds are unsuitable for cycle storage. In fact later in the SPD it is suggested that a shed with a wooden floor is not suitable for a two wheeled vehicle due to its weight. This in turn implies that a shed with a concrete floor would be an acceptable parking location for a two wheeled vehicle but not a cycle interestingly. As an example, sheds with concrete bases and appropriate, secure locks are acceptable for cycle storage in neighbouring Bedford Borough and would suggest a similar approach appropriate for Central Bedfordshire also.

The SPD sets out that garages can be used for cycle storage providing there is space to also park a car. This wording should be amended as the document is clear that single garages will not counted as parking spaces and can therefore be smaller than required for a vehicle, storage and cycles. Paragraph 4.4.1 supports such an approach.

Parking Bay Layouts and Dimensions

It is not considered that it is necessary to have a full 1m on both sides of the vehicle if it is parked between 2 solid structures as the 2.5m side parking space is already wider than a typical car. It is suggested that 1m wider than the car would be more appropriate. Bedford Borough Council requires driveways are 4.1m wide reflecting the width of a car plus access space as opposed to the proposed 4.5m wide reflecting the width of the space plus access space. A width of 4.1m is held to be more than adequate in addressing access movements around a vehicle including for cycle movements.

3rd and 4th Parking Spaces

Whilst the flexible approach is welcomed in respect of the 3rd and 4th parking spaces needed, it is not clear whether this approach will result in good quality design and beautiful places. Planning permission will be granted for developments with large private houses having 2 on plot parking spaces and likely a grassed/landscaped area to the front and/or side of the dwelling. The landscaping will be beneficial to the streetscene and development as a whole but would expect that this would be in the short-term, with owners likely to pave over the spaces over time to provide the 3rd/4th parking space to the detriment of the streetscene. This is particularly as the drop kerb would be in place, making it easier to do so, when the additional space, under the draft SPD, is to be provided away from the house on adopted highway rather than on private drives where arguably most of these larger properties would be sited. As the allocation of the 3rd/4th space would have been delivered as part of the scheme implementation, this flexibility would likely lead to overly parking dominated layouts, contrary to the drive for greener schemes.

Consideration will also need to be given to surface water drainage and whether drainage schemes need to be capable of managing the surface water resulting from the proposed site layout or the surface water resulting from a potential future scenario, on top of existing pressures to allow for urban creep in the new drainage network.

It is also unclear how the implementation of the space in the location shown on the plans will be controlled, especially when permitted development rights exist for the provision of hard standing within the curtilage of a dwelling. It is understandable that this approach is only applied to private, freehold, housing but this could create an issue with tenure blindness on a scheme.

Parking Layouts

It needs to be clear that the parking layouts are suggested and not requirements and that there is flexibility in terms of bin and cycle storage locations and parking layouts. This is not currently clear in the document.

It is not clear why a walkway of 1.2m is required to access the front door of the property rather than 1m and should be further explained for clarity.

The proposed parking layouts, especially those which relate to parking to the side of properties, will result in almost as much space between houses as there is built development. It is considered that this would significantly impact on the rhythm of development and quality of the streetscene. It is suggested that the additional 1m on both sides of the parking space is to enable disabled access but the disabled parking spaces specified in appendix 28 are 3.6m wide with no additional space.

To aid this point, our submission includes some explanatory layout examples using current and proposed standards across typical housing development layouts – one with all 3-beds and the other with a mix including larger 4-bed properties which would require a 3rd allocated space. The illustrative examples show the relative impact to density and net developable areas within standard development templates. In the example with the larger housetypes, the likely provision of a 3rd allocated space to the front of the property is shown, with the impact of increasing hardstanding and reducing capacity for soft landscaping in the long term.

Impact of Proposed Approach

The enclosed plans show that the increased driveway widths would result in an 8 unit scheme requiring 0.199ha rather than 0.22ha, with the dimensions increasing from a width of 60m to 66m and depth from 28m to 29m. This demonstrates the significant impact there would be on housing delivery on all sites but in particular allocated sites. The plan shows that density of the 8 unit scheme would decrease from 40.2dph to 36.4dph, a 9.4% reduction.

It is estimated that the approach to residential parking could result in a circa 10% decrease in the number of dwellings that could be provided on each site. The Local Plan seeks to deliver a minimum of 39,350 homes by 2035, accepting that some have already been built or consented, a loss of circa 10% would equate to almost 4000 dwellings which would result in a large number of new development sites being needed.

Other Matters

It is also unclear how the parking approach would be implemented with respect to drive-through arrangements and linked semi-detached properties. The width of the driveways would be excessive, challenges to build and be unacceptable in design terms.

It is unlikely that flats over garages would be constructed with the new guidance as the garage would not be accepted as parking space; except where used for bin/cycle storage. Flats over parking (as carports) could be built but the resulting flats would be excessively large due to the width of the parking spaces beneath.

As an unintended consequence, the large areas for parking could result in people trying to park more cars in the space than intended. For example, the disabled parking spaces to be provided for ground floor flats would be 3.6m wide, if 2 of these were allocated to a 2 bed flat next to each other, there is space for 3 x 2.4m wide spaces. Consideration needs to be given to the balance between providing sufficient space and providing so much that inconsiderate/inappropriate "over parking" occurs.

The increased areas for parking etc will result in an increase in the amount of materials required, and consideration needs to be given to the sustainability impacts of the guidance.

It is not clear how tree-lined streets, required by paragraph 131 of the NPPF, can be accommodated with the proposed approach and delivered with certainty, particularly where there will be additional pressure on adopted streets to take allocated spaces for those larger properties requiring a 3rd or 4th space.

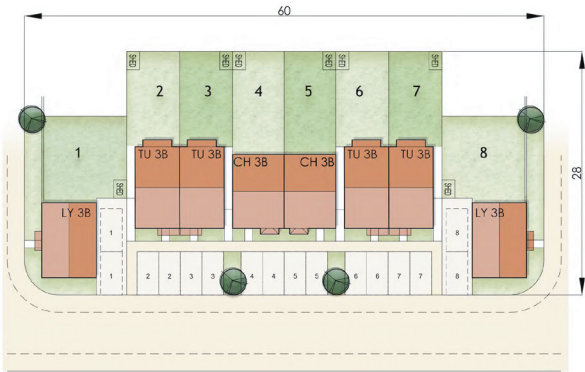
During our meeting it was suggested that the guidance had been assessed against other comparable local authority areas. It is not clear which ones but it is not considered that Bedford Borough is all that different from Central Beds but the standards are in excess of their requirements.

Implementation & Application

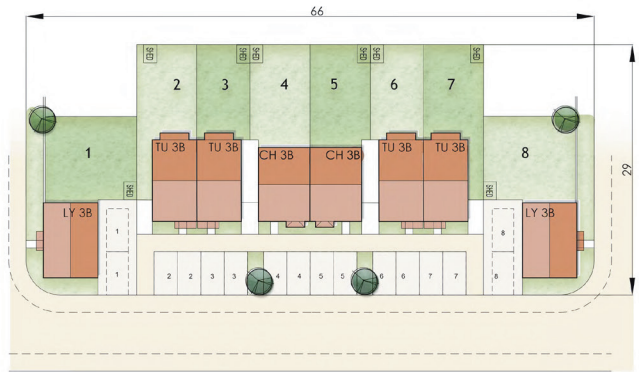
The timing of the implementation of the standards is crucial. It is understood that the SPD will not be adopted until mid 2023, but developers may be preparing applications or considering sites now which could be impacted by the new approach. All parties need to understand when the contents of the SPD will be applied to planning applications and if an application is submitted before the adoption of the SPD but it determined after adoption, how that would be dealt with.

Applicants need to understand how the SPD will be applied by planning officers, whether it is a document which will be strictly adhered to or whether it is guidance. Certainty is what applicants are seeking. Avoiding situations where one planning officer applies the standards and one doesn't is essential.

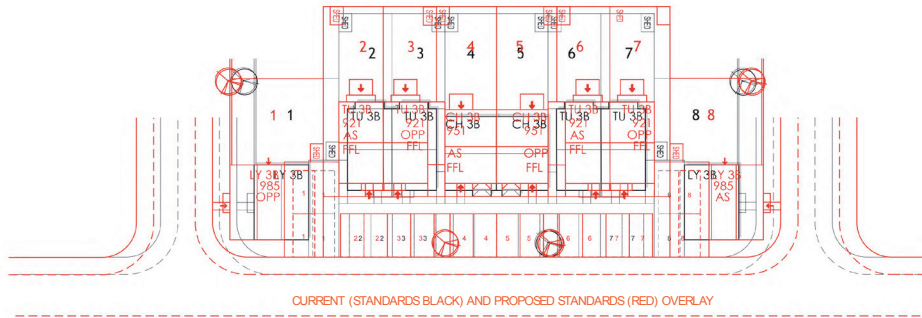
Plan A



CURRENT STANDARDS
 APPROXIMATE NET DEVELOPABLE AREA: 0.199 HA
 DENSITY: 40.2 DPH

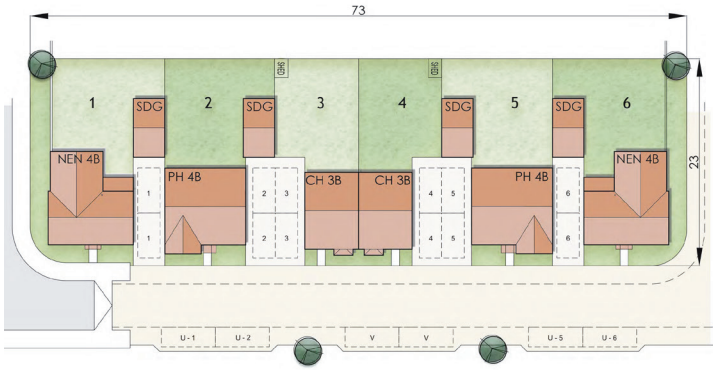


PROPOSED STANDARDS
 APPROXIMATE NET DEVELOPABLE AREA: 0.22 HA
 DENSITY: 38.4 DPH

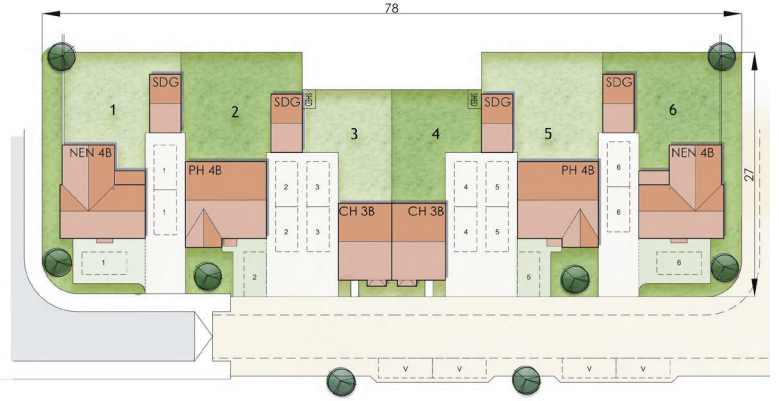


CURRENT (STANDARDS BLACK) AND PROPOSED STANDARDS (RED) OVERLAY

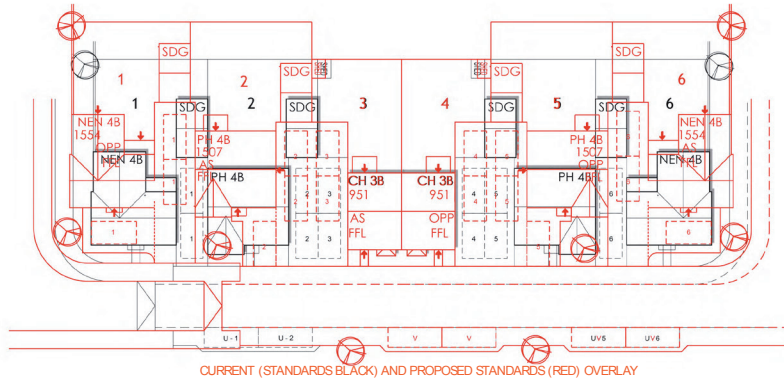
Plan B



CURRENT STANDARDS
APPROXIMATE NET DEVELOPABLE AREA: 0.23 HA
DENSITY: 26 DPH



PROPOSED STANDARDS
APPROXIMATE NET DEVELOPABLE AREA: 0.266 HA
DENSITY: 22.5 DPH



CURRENT (STANDARDS BLACK) AND PROPOSED STANDARDS (RED) OVERLAY



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