

Comments on Central Bedfordshire Design Guide February 2023

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Page / para	Comment
35 6.2.3	The network of roads should surely be designed to provide easy and safe walking routes as well as convenient vehicular and cycle routes; this is likely to involve separating pedestrians from vehicles / cyclists, either on different routes, or, as a minimum, on a safe footpath protected from wheeled traffic by a kerb.
36 6.6.4	<p><i>'These areas could be sensitively laid out as shared spaces in order to maximize pedestrian movement and calm traffic speeds. Shared spaces should be accessible to as many people as possible.'</i></p> <p>Shared spaces do not work like this! The market square in King's Reach, Biggleswade, and Hitchin Street, Biggleswade, are nightmares for pedestrians: I was nearly hit by a car in Hitchin Street recently. Shared spaces become a 'go-anywhere' option for vehicles, the footpaths become uneven due to damage by vehicles. Pedestrians are scared by having to dodge motor traffic.</p> <p>Whilst <i>some</i> drivers may slow down in shared spaces - which may be reflected in reduced average speeds quoted in literature on the subject - a few do not; it is that few that make shared spaces a very, very unpleasant place for pedestrians, especially the less mobile.</p>
36 6.6.5	<p>The low threshold to the footpath on a shared space is often taken by drivers to be a sign (like a dropped kerb) that the footpath is a place where vehicles are permitted.</p> <p>All roads should have a proper kerb, to protect pedestrians; those with sight impairment (referred to here) do not dislike shared spaces just because of the low threshold - it is because they do not have the protection from traffic that a proper kerb provides.</p>
38 Fig 82	Where is a safe space for pedestrians on this street? What parts of the road are vehicles not allowed to travel on?

46 6.21	This all relates to the external appearance of the windows. On King's Reach, Biggleswade, many properties have very small windows - no doubt to achieve a certain design effect. However this often provides insufficient light to the interior of rooms for normal day to day activities to be carried out without artificial light; indeed, our house was built with no window on the landing at all (with all upstairs doors shut, it was completely dark). We have since had a velux fitted over the stairs! Window design should therefore be from both the aesthetic (external) point of view and the functional (internal).
48 6.22.2	Houses that turn corners - while ideal from a land utilisation perspective, the internal challenges of such an arrangement must not be overlooked - an off-square room may not accommodate all required furniture. Such properties should surely be of a larger square-footage than comparable 'square' properties because of the wasted space at corners.
50 6.22.7	Bin storage - space should be provided (on all properties) so that bins can be placed 'out' for collection without obstructing the footpath; householders should be required to keep this space clear so that their bins do not block pedestrians using the footpath.
53 6.22.12	Roof vents (or velux windows) can also aid air circulation to overcome overheating in modern buildings and should be preferred to air conditioning.
58 Fig 168	Large south facing windows (ASDA Biggleswade) - in winter these allow the low sun to shine directly into the building, making it very difficult for some people with sight issues to see what they are doing when approaching the tills. Large windows like this should be fitted with blinds and these used when conditions demand it.
61 7.1.2	<i>'...functional, appropriate to their context and accessible for all'</i> - what about SAFE? What about facilitating access by emergency vehicles?
61 7.2.2	<i>'Developments should be structured around a layout that minimises travel distances, encouraging walking...'</i> It's fine having a layout of streets that encourages walking, but the design of the streets themselves - safe, unobstructed footpaths (with kerbs) for pedestrians, good surfaces (not block paved or, heaven forbid, mud (as per Maunder Avenue, Biggleswade)), safe crossing points that aren't blocked by parked cars, for instance - is critical in encouraging people to walk rather than use a car.
61 7.2.3	Permeability for pedestrians in cul de sacs is important - not only must it be designed in, it must be maintained: on King's Reach, Biggleswade, one road (Compton Mead) was designed as a cul de sac with pedestrian access through to a footpath to Edward Peake school and the local post office. One of the residents there complained about the people walking through and it was closed off!
63 7.2.8	Access way size should surely be dictated by the need for emergency vehicle access as well as dustbin lorries? I believe 3.0m clear width is required for a fire appliance on a straight road, more on a corner.

63 7.2.9	3.7m headroom ... what about removal lorries? Should these be able to access off-street parking areas, or should the street be blocked with them when loading and unloading? If the latter, the street outside the vehicle access way - excluding footpaths - needs to be wide enough to allow a removal lorry to park and for vehicles to pass it easily - this might be at least five metres, perhaps more.
63 7.2.10	Vehicular routes need to be properly marked / signed to ensure pedestrian safety. (Those on King's Reach, Biggleswade, aren't)
63 7.2.14	I agree with the ' <i>safe, and perceived to be safe</i> ' view. This surely rules out 'Shared Spaces'.
63 7.2.15	This paragraph is a little confusing - it seems to say that cyclists should be treated as vehicles and not pedestrians, but should be separated from vehicles. Footpaths on King's Reach are often used by cyclists, who speed past very close to pedestrians: there should be a separate cycle lane for cyclists, with a kerb separating this from the pedestrian area. (Yes this makes the path wider, but that's the idea: the highway code now stipulates, I think, a 1.5m gap when vehicles pass pedestrians, this should surely apply to cyclists - and joint cycle/footpaths should be, perhaps, at least 3m wide to facilitate this.)
63 7.2.16	Separate paths should be provided for pedestrians and cyclists. Painting a line on a footpath does not provide a safe route for pedestrians!
64 7.3.1	<p>'A 2-metre-wide service margin...' A surfaced, kerbed footpath should be provided on all streets to support walking. (Maunder Avenue has a mud path; it is the route to an infant school, in the morning and afternoon there are many parents having to walk their parents along the road because the footpath/verge is so muddy.</p> <p>Regarding '<i>shared spaces being appropriate</i>' - I don't think there is any situation where a 'shared space' is a good idea for a public road. Examples of the problems they pose are included with this response. (<i>I write this as someone who lives on one - Mitchell Green, SG18 8GS - and I have had to dodge out of the way of lorries passing by when leaving my home</i>).</p> <p>Regarding '<i>half-on</i>' parking - education, encouragement and enforcement are called for; pavement parking can be restricted by local authorities, I believe? Also, any restrictive covenants on residents regarding parking need to be enforced (they aren't on King's Reach).</p> <p>'Cycle track...' - there must be a change in level, to protect pedestrians.</p> <p>'Where a footway within a development is recorded as part of the Public Rights of Way network, it should be upgraded to be of an appropriate width and have a tarmac surface.' - Maunder Avenue, Biggleswade, is (I believe) a bridleway, yet the footpaths do not have a tarmac surface - I believe this was to facilitate horse traffic. Shouldn't pedestrians have priority over horse traffic, especially on a road that sees perhaps two horses a year?</p>

64 7.4.1	<p>General Principles - should there not be a general principle that cycle routes should be provided independently of pedestrian routes - the two should not share the same surface?</p> <p><i>'Sharing the carriageway'</i> - the raised table/pillow referred to is misunderstood by many drivers, they use it as a dropped kerb to then drive along the nearby pavements (even those with a full kerb; I have such an arrangement outside my kitchen window). Dropped kerbs and tactile paving are probably better, although drivers confuse them too and use them as a means to drive onto the pavement to park and block the pavement to pedestrians. This is a frequent problem on King's Reach.</p>
65 7.4.1	<p><i>'Where the only option is for cyclists'</i> - on such routes there should be a kerb between the pedestrian and cycle paths; possibly, a greater width (perhaps 3.5m) would be appropriate. (A cycle is perhaps 80cm wide; 1.5m clearance to a pedestrian leading a child by the hand (as per highway code), they require at least 1 metre - I don't rhino 3m is sufficient width.)</p>
65 7.5.1	<p>Guided busways - surely more mention is appropriate of these and the challenges they pose? The Cambridge one, to the south of the city, has been closed for some time because of pedestrians not keeping clear of the buses (with fatal consequences). Should they not be fenced like railway lines?</p>
66 Fig 177	<p><i>'Shared surfaces and the reduction of signs convey to the driver a sense of entering a pedestrian priority space'</i> - My experience of living on a shared space street - Mitchell Green, Biggleswade - as well as shopping on one (Hitchin Street, Biggleswade) is that only a few drivers understand that it is supposed to be a pedestrian priority space. (The Highway Code does not even mention shared spaces - drivers do not learn about them.) Overall, drivers assume they are roads on which they can drive anywhere, at 30mph, and expect pedestrians to get out of their way; drivers also seem to believe they can park anywhere on shared space roads - including at junctions, making it difficult for pedestrians to negotiate the traffic calmers. I am afraid that there either needs to be much driver re-education on shared spaces, or they should not be promoted as an option. They certainly do NOT encourage most drivers to slow down. I am more than happy to discuss the challenges faced by pedestrians on shared spaces in Biggleswade with planning officers - at length. Reduction of signs makes speed limits and parking restrictions unenforceable - as has been pointed out by Bedfordshire Police, I believe.</p>

67 7.7.2	<p><i>'Whether pedestrians ... should be provided with segregated facilities'</i> - in any built up area, it is imperative that pedestrians are given footpaths protected by a kerb to segregate them from traffic.</p> <p>Pedestrians should not have to jump out of the way of vehicles speeding through developments.</p> <p>(Raised kerbs have been used to protect pedestrians since ancient times: I strongly recommend a visit to Pompeii to see this. The Romans did not expect pedestrians to be exposed to the risks of moving traffic, why does Central Bedfordshire Council?)</p>
69 7.7.11	<p><i>'Pedestrians have priority over vehicles and streets are designed to produce very low vehicle speeds.'</i> The highway code does not provide a road sign that states that pedestrians have priority over vehicles; moreover, the figure does not show any signage indicating this. Drivers, therefore, will be unaware of this rule. How will you make them aware? How will it be enforced?</p> <p>If drivers are not aware, and if it is not enforced, pedestrians will be at risk from speeding vehicles (as they are, often, in King's Reach, Biggleswade, and in Hitchin Street, Biggleswade).</p>
70 7.8	<p>Street Trees - requiring developers to provide them is one thing, they need to ensure they are planted correctly, and maintained (watered, pruned) to grow properly. Those on King's Reach, Biggleswade, weren't.</p>
73 7.10	<p>Shared spaces are, I understand, based on a <i>theory</i> that , in the absence of road signs, road markings, and kerbs, drivers will drive carefully and respect the rights of pedestrians.</p> <p>This is not borne out in practice - my comments later go into more detail, but the fact that they form a poor environment for pedestrians seems to have been widely recognised and documented. <i>The Times</i> reported in 2016 (http://www.rrtha.org.uk/shared-spaces-for-drivers-and-pedestrians-are-causing-chaos) that they were 'causing chaos'; and, in September 2018, the then Parliamentary Under Secretary of State for Transport, and the then Minister of State for Housing and Planning, wrote to the Chief Executives of all local authorities, stating '...the Inclusive Transport Strategy asked local authorities to pause the introduction of new shared space schemes that feature a level surface, and which are at the design stage.'</p> <p>Did Central Bedfordshire not receive this communication? I can provide a copy.</p> <p>The draft design guide does not appear to acknowledge these issues and seems to stipulate that shared minor streets should comprise a level surface shared space - exactly the sort of layout that the ministers wished to pause..</p> <p>Has the guidance from Central Government changed?</p> <p>What mitigations do Central Bedfordshire Council require from developers to reduce the known risks to pedestrians arising from such a layout?</p> <p>Why does Central Bedfordshire think that kerbs are not required when all the evidence is that they make for a safer environment for pedestrians and make people more confident to ewalk around?</p>

73 7.10	A further point to note regarding the use of shared spaces is that drivers are often not aware they are entering one; further, they are not aware when they <i>leave</i> one. There are many drivers who drive or park on the footpath of Maunder Avenue, King's Reach, because they think it is a shared space. It isn't. Shared spaces need to be properly signed (official signs for shared spaces exist in other countries, not in the UK - possibly because the DfT does not encourage their use), also the end of a shared space should be properly signed - and correct use of the roadway enforced, for example, to keep the footway clear for pedestrians.
73 7.10.1	<p>You can use whatever terminology you want, but 'shared spaces' - as used on King's Reach, Biggleswade - do not work: drivers use the Highway Code to decide how to drive, and there is no mention of this type of road in it (the 2022 edition).</p> <p><i>'can be used as a method to enhance a street's sense of place'</i> - sorry, this is utter rubbish. Mitchell Green, Biggleswade - where I live - is not a living entity. It does not possess a sense of anything, let alone a sense of place (whatever that is). It is a narrow, congested minor residential street used as a cut through by many vehicles, often travelling close to the 30mph limit, and its footpaths are used as parking space for residents who have more cars, vans etc than they have space on which to park them.</p> <p><i>'It should also be clear as to where vehicles are required to park...'</i> - this requires signage, yellow lines, etc - to stop people parking on the footpath. Yet one of the features of 'shared spaces' is that they have no signs, and no lines!</p>
73 7.10.2	<p><i>'...seeking to reduce the dominance of motor vehicles..'</i> - This is admirable as an objective but IT DOES NOT WORK. Even if some drivers obey the rules, many do not (often because they do not know them). <i>'The design must make it clear that pedestrians have priority across the space'</i> - Drivers must also be aware that they are NOT allowed to drive or park on the footpaths, and these rules have to be signed, and enforced. Shared spaces should surely ONLY be implemented with</p> <ul style="list-style-type: none"> ● Clear signage ● Clear speed limits ● Parking enforcement
73 7.10.3	<p><i>'For pedestrians to safely share the space low traffic flows and speeds are necessary.'</i> - This requires signage - for instance, 'access only' (so that shared spaces are not used as rat runs), and '15mph' roundels on street lights, and enforcement. It also requires proper management of on street parking - yellow lines and parking wardens.</p>
73 7.10.5	<p>EVs (Electric Vehicles) pose a significant problem for pedestrians on shared spaces - their approach is not heard. With the move to 'net zero' it should not be considered that ANY pedestrian will be able to hear a vehicle behind them.</p>

74 7.11.1

'They are designed to a maximum 15 miles per hour speed and hence the layout and features must ensure that this speed limit is adhered to.'
This should include speed limit signage and cameras enforcing compliance.

'Defensible Space' - these distances do not exist on many roads in King's Reach, Biggleswade, or in Hitchin Street - which is a busy shopping street - where vehicles often pass by just a foot or so from the front of shops.

'Anything located within the defensible space should be a maximum of 0.6 metres high to provide sufficient visibility for small children.' - **How will this be enforced** - and it must be? Restrictive covenants, if set up, must be enforced - and are difficult to.

'On Street Parking' - It's very worthy providing design principles but the design must provide an environment in which drivers are aware of the rules, that they will obey them, and that enforcement will be possible when they don't. This is not the case on King's Reach, Biggleswade, or in Hitchin Street, Biggleswade.

'There should be no separate footways, but they must provide safe routes for pedestrians.' - Vulnerable pedestrians need somewhere they can get away from vehicles. (8.8m width is significantly greater than Mitchell Green - which is only about 7m; I do approve of this greater width - space is needed for wheelchair users to transfer into a parked car, and for other vehicles to be able to pass that parked car, but there **MUST** be space at the edge of the road that is secure space for pedestrians. I would question whether 8.8m is enough; allowing for 2m pedestrian space on either side, that only allows 4.8m for vehicles - and a fire engine requires 3m on a straight road, I believe). **Without kerbs, how do you provide safe routes for pedestrians?**

Having said this, if there are 'reduced height' kerbs in places then the whole of the road width should be built to support the weight of all road vehicles - unless there is a proper kerb, the 'footway' must be able to take the weight of a vehicle. (In places on King's Reach there are footways on shared spaces that have not been built to take the weight of a vehicle, and have consequently deteriorated after being driven over).

'Speed Restraint Measures' - It doesn't matter how you design the lines of the buildings or the patterns of the tiles in the surface, some drivers will be in a hurry and will not stick to a 15mph speed limit unless it is **clearly signed** and **enforced** - especially in roads that are the shortest route from one part of a development to another (like Mitchell Green).

	<p><i>'Materials'</i> - Block paving is wholly unsuitable to this type of application. The blocks move - especially around drain covers - the sand beneath will become infested with ants (a problem on King's Reach every summer), and weeds will grow in the sand between the blocks (Chamberlain Park, Biggleswade suffers greatly from this). Also block paving does not support bollards very well, when they get knocked the blocks tend to lift out, rather than supporting the bollard in place. Also, when work is done by utilities, the block paving is put back badly. Hitchin Street, Biggleswade, has an AWFUL surface because of this.</p>
75 7.12.1	<p><i>'New developments should be designed to avoid the need for service and emergency vehicles to reverse.'</i> - this will require wide enough roads, and drivers to obey rules (as in the highway code) regarding parking, and for parking restrictions on the development to be clearly signed, and enforced. My partner was taken to hospital in an ambulance (no. 576, on 28 December 2022) that had to do a three point turn because of bad parking around the junction of Mitchell Green and Hawking Drive, Biggleswade. A badly parked car can be an inconvenience to some people; in a few cases, it could mean the difference between life or death: parking rules must therefore be clear and enforced.</p>
75 7.13.1	<p><i>'Sufficient parking solutions should be provided'</i> - Parking rules will need to be clear to drivers, and enforced - otherwise the turning area will be used for parking of residents' vehicles, as well as any inset parking spaces elsewhere. (In general, residents tend to believe that they, and their visitors, have a right to park on the street near their homes. If this is not the case it must be made very clear to them.)</p>
75 7.15.1	<p><i>'Standard grey kerbs and plain blacktop footways...'</i> - some roads in King's Reach have footways that have been topped dressed with loose pea shingle (Hawking Drive being one) This is a mistake - anyone falling on such a surface will suffer a worse injury than they would falling on a plain asphalt surface. Also, it was not clear in the document that drainage from the footways should be through street drains - they should be slightly inclined towards the kerb to avoid puddles and to avoid draining onto residents' property.</p>
76 7.16.4	See my comments above (7.11.1) regarding block paving
76 7.16.6	Granite setts - I agree. Any road features involving granite setts should have a pedestrian footpath on both sides, and parking on that footpath should be banned. (Wheelchair wheels can stick in the setts, which could overturn the 'chair.)
77 7.16.8	Paving slabs - these are easily broken if motor vehicles drive on them. They should only be used where vehicles cannot go.

78 7.18.1	Private verges - these should not pose a risk to pedestrians; these should not encroach on the footpath - there should always be an adequately wide footpath (2m ?). Any private verge should not feature steps or other trip hazards - including low planters. Grassed verges (part of the highway) should be segregated from private space to discourage residents taking them over as extensions to their gardens - this has happened in places in King's Reach, Biggleswade.
78 7.19	Notwithstanding DfT guidance, some caution needs to be exercised in the amount of tactile paving used. Users of some types of wheelchair - typically, solid tyres and minimal suspension (cheaper ones) find traversing such paving quite uncomfortable; it may be that 'long term' disabled people may well have a better 'chair, but the needs of the short-term disabled must surely be considered. (Some pedestrian routes at the A1 retail park at Biggleswade feature many crossing points, and hence many of these uneven paving surfaces.)
78 7.21	Should there be consideration of switching off street lamps between, say, midnight and 5am (as in North Herts), or even having no street lights (as in Theydon Bois, Essex)?
78 7.19.1	Tactile paving - parking on such crossing points should not be allowed, a single white line should be used beside it, and the parking rule enforced. Also, the crossing point might need to be protected by bollards, to stop drivers using it as a means of driving onto the footpath.
79 7.22.1	This implies that signage should be provided to indicate 15mph limits on shared spaces, and to indicate parking restrictions.
79 7.22	No mention of any requirement for streets to be suitable for any house to have a 'disabled' parking space in front of them.
79 7.22.7	Positioning of cycle stands in particular must be done with care - any cycle attached to them should not obstruct pedestrians; when they are in use they are more of an obstruction than when they aren't! (The A1 Retail Park, Biggleswade, features a number of very poorly positioned cycle stands).
79 7.25.1	Accessibility - the design should surely be subject to a disability compliance walk through before it is agreed to be acceptable; surfaces and inclines should all be wheelchair friendly, and all houses should have appropriate frontage to ensure that a disabled person can get in and out of a car safely.
80 7.25.10	<i>'All developments should be designed with accessibility in mind.'</i> This is, I'm afraid, at odds with many other proposals in the document - shared spaces, and use of grassed verges in some streets. Disabled people (among others) need a safe, well surfaced part of the road on which vehicles do not travel.
80 7.25.11	You have not mentioned balance impairments - many older people have issues with their balance. Poor footpath surfaces can be dangerous for them.

80 7.25.14	'...can easily and safely enter/exit a vehicle.' - This should say 'from either side'; a disabled person should always get in or out of a vehicle protected from the passing traffic. This may give rise to considerations on one way streets, or for perpendicular spaces for disabled users.
81 7.25.18	<i>Continuous Crossings</i> - These are not mentioned in the 2022 Highway Code. Drivers will not know how to behave; pedestrian users of these will be at risk unless clear signage is provided.
7.25 general	There is no mention of the maximum (steepest) gradient that is permissible for ramps and crossing points designed for wheelchair access. I would suggest the following (from Kent County Council): Ramp design: <i>the recommended maximum ramp gradient is 1:20, although steeper gradients of up to 1:10 may be acceptable over short distances; the recommended minimum width of a ramp to accommodate all types and abilities of user is 1200mm.</i> Many ramps at crossing points on King's Reach, Biggleswade, are steeper than this and therefore unusable for their seeming intended purpose.
88 8.6	Landscaping - seemingly not mentioned is that the landscaped areas need to have adequate soil and infrastructure for the planting to grow. Merely plonking young trees into holes is not going to provide a healthy green environment; plants require water, and maintenance, and the soil may need special preparation (addition of organic matter). None of this was done on King's Reach, Biggleswade, and many trees and hedging plants have died as a result.
111 9.21	Public art should not be placed on a footpath or any other pedestrian area where it can pose a trip hazard or form an obstruction.
115 10.2.4	Successful communities - no mention of retail here. Are residents expected to get in a car to drive to shop? Fig 267 also fails to mention retail.
116 10.3.4	How will you ensure that this type of business is incorporated in a development? Developers may fail to market business premises adequately, then seek to convert them to residential, leading to a loss of facility on a development. (Two offices on King's Reach, Biggleswade, were converted to residential in this way - little attempt had been made to market them, they would have been ideal as a doctor's surgery outpost, a parcel or homeworking hub, or perhaps an accountant / solicitor office).
117 Fig 272	These diagrams seem to assume that vehicles will be parked <i>wholly</i> within a marked space. How will you ensure that they do - that long overhangs of, for instance, LWB vans (perhaps with towbars) do not encroach on the 'pedestrian' space?

118 10.3.15	<p>Should you not spell out what this means - a level entrance at the threshold, and any ramps less than (I believe) 1 in 12? (Many properties on King's Reach, Biggleswade have most peculiar ramps and steps that would be impassable to a lone wheelchair user.) Any ramps should not, of course, pose a hazard to pedestrians using the footpath - another problem that has arisen at King's Reach (around the shops on Sullivan Court west side).</p>
129 10.12.1	<p><i>'Schools should be designed to prioritise pupil safety'</i> - should safety of everyone - pupils, staff, and passers-by not be a priority? (Ivel Valley school in Biggleswade is close to where I live, and there are many problems with traffic at start and finish time. The main footpath from King's Reach to the town centre crosses the car park, yet there is no protection - not even a kerb - for pedestrians among what can be several moving vehicles.)</p> <p>Also, a school should have all the rest and recreation facilities that are required for a business with that number of staff - including a smoking shelter. (Staff at Ivel Valley stand outside smoking on the aforementioned footpath, and at least some leave their cigarette ends there.)</p>
130 11.0	<p>Note the red car in the picture, parked close to a junction on the opposite side of the road. Highway Code rule 243: '<i>... do NOT stop or park Within 10 metres of a junction....</i>'. A fire engine might not be able to get around that corner; this photograph is of part of King's Reach, Biggleswade, and such parking is common there - there are places where it is much worse. There may be rules or standards that drivers should follow, but not all drivers will.</p>
132 11.3.5	<p>In addition to space, the design of the heating system should surely allow for heat pumps - requiring (I believe) large bore piping and large radiators, or underfloor heating?</p>
133 11.4.2	<p>Having had extra windows fitted to the home I share - in part to support a slightly disabled partner - I agree wholeheartedly. However, developers may try to minimise window area in properties, because bricks are cheaper, and - possibly - windows increase energy consumption; such arguments should not be listened to. Good light is important.</p>
134 11.6.2	<p>1.5m setback - gap between a front door and a space used by vehicles - is only just enough for a person to stand to lock the door and a person between them and the 'road' - possibly in a pram or a wheelchair. Elsewhere I have commented on the need for drivers to understand shared spaces, and for speed limits and enforcement. I can assure you it is not pleasant having a pick-up truck pass at nearly 30mph only a few inches from you.</p>

134 11.6.3	<i>'...where a pedestrian friendly character with lower traffic speeds is to be created..'</i> - if an area is supposed to have lower traffic speeds (perhaps 15mph) you need to tell drivers, and require them all to stick to it, otherwise some will exceed the limit and make the street very dangerous for pedestrians.
134 11.6.5	Frontages smaller than this will be used for parking - several properties in King's Reach have paved over their frontages and park cars their 'part on, part off' the road. Something is required to enforce the rules?
135 11.6.6	I believe the distance between a vehicle and the house also requires consideration of the risk of exhaust fumes entering the building?
135 11.7.2	Boundary definition - surely this goes against the use of grass verges in residential areas, where there is no clear distinction between a grass verge (part of the highway) and a front lawn (private property)? King's Reach, Biggleswade, has some roads that feature grass verges, and some residents consider the verge to be part of their garden.
137 11.9.5, 11.9.6	I agree with the garden size recommendations. Many on King's Reach are smaller - notably in terms of depth (ours in just over 9m). Consideration is also required in terms of other buildings; we have a south facing garden that gets no sun in the afternoon because of a neighbours house and a tall garage.
139 11.13.2	Single dwellings - space should be provided at the front of the property for bins to be placed on collection day so that they do not obstruct the footpath.
140 11.14.11	<i>'Where there is a defined pedestrian margin, this is the correct location for underground services'</i> - As previously mentioned, such pedestrian margins on shared spaces may be susceptible to use by all types of vehicles - hence routing of services underneath them may require special reinforcement. A proper footway, protected by a kerb, might be a better alternative.
146 11.28.3	<i>'Where a single garage is provided, the dimensions of the garage do not need to allow for a car to fit into it'</i> - Surely, if a garage is provided that is not sufficiently large to hold a car, alternative off street parking should be provided to ensure that vehicles do not end up being left on the street?
149 11.32	Impact on neighbours of extensions - no mention is made of parking; if an extension is built on land formerly or potentially used for parking, where will the residents cars be parked? Off-street parking spaces should not be built on.

176 13.2	<p>I do not blame the authors for providing images of the ‘exemplar’ part of King’s Reach, but I do believe there are many points that can be learnt from mistakes made on this development, as my previous comments may indicate.</p> <p>Photos illustrating some of my experiences are included later in my feedback.</p>
176 13.2.3	<p><i>‘The development is designed around a strong Green Infrastructure network. The landscape design creates an environment where buildings interact with their surroundings while incorporating sustainable drainage features.’</i> - I agree with the intention of having much green space in KR, but in places the implementation has been poorly thought out and seemingly used as an excuse to throw common-sense out of the window - the grassed footpaths on Maunder Avenue (photo later in this document) have become a muddy, uneven mess, and surfaced footpaths do not link to provide a convenient route for pedestrians - it is as if the design was intended to <i>discourage</i> walking.</p>
176 13.2.4	<p><i>‘Parks and green corridors, including paths and bridleways, create public spaces for new and existing residents to enjoy. These spaces are overlooked by dwellings to provide natural surveillance.’</i> - I agree, and having green spaces within sight of our kitchen window makes for a pleasant environment. Unfortunately the implementation has been poor, subsoil was used instead of quality topsoil for the Maunder Avenue recreation area, the grass is weak and full of weeds, and much of the beech hedging has died - possibly because of poor aftercare on the part of the developers. Surely developers should be required to maintain green spaces (up to the time of adoption?) as well as create them?</p>
Additional point	<p>I may have missed it but I do not recall seeing anything about the provision of litter bins in public spaces; these are surely essential?</p>
Additional point	<p>I may have missed it, and I expect it is covered in another document, but there seemed to be no mention of the minimum carriageway width for roads on new developments. Maunder Avenue, King’s Reach, has a 4.8m carriageway, with a 2m footway on one side (surfaced, outside my home); this is not wide enough for one of Central Bedfordshire Council’s bin lorries to pass another identical bin lorry. There was an occasion a few months ago when a bin lorry was passing in each direction; one mounted the footway outside my home to allow the other to pass. When moving off the rear end of the bin lorry swung out and removed a sizable chunk of my hedge - that had been growing in <i>my garden</i>, well away from the vehicle space on this road.</p> <p>I therefore suggest that 4.8 metres is in no way wide enough as a vehicle space on a road.</p>

Additional point	<p>Large developments - like King's Reach, Biggleswade - are designed in stages; detailed designs - and planning applications - are done for small areas (perhaps 30 dwellings) at a time. It is critical that the resultant environment does not show this piecemeal development; moving - especially on foot - from one part of a development to another should be seamless. On King's Reach it isn't; footpaths don't join up, or take dog-leg diversions in an attempt to disguise measurement errors on the part of the designers, and levels of adjacent areas do not match.</p> <p>I do not believe that this point is made in the document?</p>
Additional point	<p>I do not recall seeing anything in the document about how Central Bedfordshire Council will monitor design and construction of a new development, or how it will ensure that the standards laid out in this document will be adhered to by developers. It is clear that, in the case of King's Reach, Biggleswade at least, the developers were able to take some significant short cuts resulting in a development that is in some respects far from ideal for many of its residents, and indeed for Central Bedfordshire Council going forward. Among the issues there are</p> <ul style="list-style-type: none"> ● Poor road and footpath surfaces ● Incoherent routes for pedestrians ● Access issues for emergency services ● Parking issues ● Poorly signed and marked out roads

The following photographs illustrate some of the points I have made, especially regarding shared spaces, and selection of surfaces for use in developments.

Photos

- 1) [REDACTED] grassed footway (or verge?)
unsuitable for pedestrian use, blocked route for pedestrians from Chamberlain Park onto
road, missing dropped kerb, van parked 'two wheels on'



2) [redacted] - shared space dominated by parked vehicles



3) [redacted] - footpaths obstructed by parked vehicles, pedestrians have to use the road



4) [REDACTED] - one car parked on the dropped kerb by the pedestrian crossing, another parked where it will prevent large vehicles from being able to turn this corner (on at least one occasion an ambulance leaving [REDACTED] taking someone to A&E had to use an alternative route, and perform a 3 point turn, because of a vehicle parked here)



5) [REDACTED] - as can be seen by the wet trail on the surface, the incorrectly parked white mini causes vehicles driving along the street to pass close to the shop entrances on a shared space (as in the case of the van, passing [REDACTED])



6) Spacing required for a wheelchair user to transfer into a car, on a shared space ([REDACTED]) - note that there is insufficient space for a vehicle to pass without going on the pedestrian zone



7) Missing dropped kerbs and connections for wheelchair users (King's Reach) - ramps and dropped kerbs should be provided to ensure that wheelchair users can easily and safely get around any development just as easily as a walking pedestrian



8) Wheelchair users cannot easily traverse some traffic calmers, or pass along grassed footways ([REDACTED])



9) Ramp at crossing point too steep for wheelchair users ([REDACTED]



10) Connecting footpath from [REDACTED] (King's Reach): no dropped kerb for pedestrians at [REDACTED] end (also inconvenient for workers who surfaced it, they had to move a heavy roller from the nearest dropped kerb, causing minor damage to the surface - white marks); also has only been surfaced to footpath to [REDACTED], short section to [REDACTED] is still unsurfaced.



11) [REDACTED] King's Reach - wholly unclear where pedestrians are supposed to walk, and where vehicles are supposed to park.



12) [REDACTED] King's Reach - narrow 'footway' obstructed by bollards and street lamp. A raised kerb is featured, but with block paving; is this a shared space or not?



13) [REDACTED] King's Reach - boundary marker between front garden and grassed footway (part of the highway) has been removed, footway is seemingly being maintained as part of the garden. Also note the bin blocking the footway - there should be space for bins on householders' properties.



Same road - no demarcation between verge (highway) and front garden



14) [REDACTED], King's Reach. Porch of property projects over the road - even over the vehicle space (it being a shared space). No frontage to protect residents when leaving their property. Bin has to be placed *in the road*.



15) [REDACTED], King's Reach. Car parked on pavement - actually in the tree planting hole - rather than in parking space a few yards away; unless there are clear rules, and enforcement of them, the environment will not be respected. Note the tree has not been well maintained.

