



GREAT DENHAM Parish Council

Planning Department
Bedford Borough Council
4th Floor
Borough Hall
Cauldwell Street
Bedford
MK42 9AP

7th February 2023

Dear Sirs

OBJECT

Planning application 21/01582/MAF – 95 Houses on land W and E of Mercia Road, Great Denham – Amended/additional plans and new documents.

Firstly, thank you for agreeing to an extension for Parish Council comments on these new documents and this application.

The Council reviewed the application at its meeting on Monday 6th February 2023 and wishes to register its **objection** to the application as currently proposed.

The Council remains very disappointed that none of the areas raised by the Council in its previous comments and objections have been addressed in these updated documents, and that the feedback given to the David Wilson Homes representatives who attended the September Parish Council meeting does not seem to have been considered.

The Council has reviewed the documents in some detail, and has provided detailed comments referencing specific plot numbers below. The Council remains of the view that the overall site layout is poorly designed, with a large number of both resident and visitor parking spaces badly laid out, with subsequent adverse impact on:

- Overall traffic safety, including that of pedestrians
- Overall resident well-being.

The continued use of parking court layouts in the design is of significant concern, as, from experience, the impact of these on on-street parking is considerable; we note that the Borough Council's emerging Design Guide for Local Plan 2040 (p153) also highlights the use of Parking Courts as a concern. A number of the issues highlighted are based on the learning from the existing development. The Council has had to deal with resident messages about these consistently over the years, and as residents of Great Denham, councillors have also experienced the impact of these themselves.

In making these comments the Council hopes to provide insight for development of this part of Great Denham, and has also identified a number of items which it would like included as Planning Conditions when determining the application.

The following comments are based on the amended/additional documents out for consultation, with specific reference to:

Type	Plan	Date
Vehicle Tracking Plan	V62B	13 January 2023

Site Layout as proposed	V02C	13 January 2023
Surface finishes	V55C	13 January 2023
Landscape Plan	V56C	13 January 2023
Parking Layout Scheme	V58C	13 January 2023
Highways Scheme	V59C	13 January 2023
Refuse Management	V60C	13 January 2023

Areas of concern

- Design of Parking and impact on on-street parking congestion, with subsequent impact on road/traffic safety
- Design of Parking and impact on crime/anti-social behaviour
- Design of Parking and impact for residents, including pedestrian safety within the parking areas
- Parking access and impact on road traffic, including car and pedestrian safety
- Road and junction safety
- Provision of green space and community amenity
- Highways Plan and impact of proposed adoptable areas
- Developer anticipated use of Service Management companies to offset S106 obligations for adoption
- Impact of construction on residents and residential area
- Impact of additional housing on infrastructure, including school provision

Detailed comments and observations

1. Design of Parking and impact on on-street parking congestion, with subsequent impact on road/traffic safety

(a) The distance of allocated parking spaces from their properties will result in residents using visitor spaces on-street to be closer to their properties. This will increase street congestion:

- Parking for Plots 1 and 2 – these have been placed at furthest end of coach house parking, whilst parking for coach house (plot 4) is closest to plots 1 and 2.
- Parking for plot 3
- Parking for plots 7 and 10
- Parking for plots 22 and 23
- Parking for plots 25 and 26
- Parking for plots 29 and 30
- Parking for plot 41
- Parking for plots 55, 56 and 57
- Parking for plots 79, 80 and 81

(b) Location of visitor spaces in parking courtyards not visible to non-residents and so visitors will park on street.

- 10 visitor spaces have been provided on W side of Mercia Road, with 24 visitor spaces located in parking courts/parking areas behind Mercia Road which are not visible to drivers on approach

(c) We also note that as a result of this development the current car parking area at the top of Mercia Road (for the former Barratts Sales Office and show home) will be

removed; this currently enables at least 6 cars to park here. These cars will be displaced as a result of this build and contribute to the on-street parking and congestion issues. Whilst removal of this parking area is inevitable, we wish to have this impact noted.

2. Design of Parking and impact on crime/anti-social behaviour

(a) Parking spaces are located at some distance away from the property they belong to, and are outside line of sight for residents of that property. This is an increased security risk for residents, given the levels of vehicle-related crime in Great Denham. The effect of this will be that residents will choose to park where their vehicle can be observed from the property; in most cases this is likely to be on-street. In addition to the plots identified in point (1) above, the following are extreme examples of this problem:

- Parking for plots 1 and 2
- Parking for plots 27 and 28
- Parking for plot 76
- Parking for plots 83, 84 and 85

(b) The design of parking areas at the rear of the majority of properties provides a number of “hotspots” for crime and anti-social behaviour, given the lack of visibility of these spaces, the enclosed area of the parking courtyards. Theft from motor vehicles remains one of the highest aspects of crime in Great Denham. Courtyards, if provided, need to be well-lit.

3. Design of Parking and impact for residents, including pedestrian safety within the parking areas

(a) The location of parking spaces in relation to access to the property the space is allocated to mean that for a number of residents they have no direct access to their property from their allocated space, requiring a walk of some distance. Residents with children, shopping, mobility access etc will find this difficult and this may also result in driving resident parking into on-street visitor spaces (see (1) above for impact on on-street parking and congestion). Some examples of this:

- Parking for plot 43 – the location of this space has no access to the front of the property and therefore a hazard for pedestrians in the parking area
- Parking for plots 54, 55, 56 and 57 – the location of these spaces in relation to the properties they belong to; this should be reconfigured to minimise inconvenience for residents.
- Parking for Plot 87
- Parking for plot 89 – with no access to the front door of the property this corresponds with, it is probably that the resident will use the visitor space directly outside the property as alternative (please see comments for (1) on impact on congestion and on-street parking).

(b) Current design of parking layout will result in residents unable to enter/exit their own parking spaces without restriction.

- Parking for plots 1-5, plot 46 – inadequate turning space means drivers may need to reverse out of parking area onto Mercia Road, with all hazards of visibility and oncoming traffic this presents.
- Parking for plot 61 – the location of the visitor space outside this property limits the entrance/exit to the space and the turning circle available.
- Parking for plot 74 – turning circle for this parking space is restricted by the location of visitor space opposite.
- Parking for plots 24, 33, 34 and 61 – the location of these parking spaces at the end of a road with no hammerhead turning space provided mean that any vehicle parked outside the corresponding properties, either on the street or in visitor spaces, will impede both entrance and exit to these spaces for residents. We already have an example of this on Lavender Lane in Great Denham, and do not wish to see this repeated.

(c) The location of a number of visitor spaces in the off-street parking areas are narrowing access and contributing to vehicle and pedestrian safety concerns, specifically:

- Visitor space outside plot 48 narrows the road at the entrance to this parking area from Mercia Road and also reduces visibility for cars entering/exiting parking for plot 49. Visitor space outside plot 48 is also directly opposite the entrance/exit for parking for plots 88-95, thereby narrowing the road at this point for all cars entering from Mercia Road and entering/exiting from plots 88-95.
- Visitor parking outside entrance to plots 88-95 (specifically outside plots 88 and 93), together with issues identified above, will severely reduce visibility for all drivers at this location.
- Visitor space outside plot 50 will reduce the width of the road for all passing traffic at this point.

(d) Provision of Electric Vehicle Charging (ECV)

The current parking layout does not make sufficient provision for ECV points for residents within their properties. This must be included as a condition of planning, in line with Borough Climate Change approach and Great Denham Neighbourhood Plan (emerging) and Design Guide.

4. Parking access and impact on road traffic, including car and pedestrian safety

- (a) The location of entrance/exit to parking spaces for plots 54-57 – the location of this entrance in the corner of the street is hazardous for pedestrians and vehicles given its location; it is similar in design to the parking area entrance opposite 56 Cantley Road in Great Denham; any vehicles parking outside adjacent properties will impede entrance/exit.
- (b) Parking for all 95 properties will exit onto Mercia Road and be a significant increase in traffic numbers for this road.
- (c) Height restrictions for vehicles entering parking off-street parking areas will mean all residents with transit vans etc must park on-street. This will affect both residents and any tradespeople doing work on behalf of residents, and contribute to on-street parking and congestion, with potential to adversely affect pedestrian safety. In particular, where large vehicles are parked close to road junctions, thus reducing overall visibility.

5. Road and junction safety

The junction of Saxon Way/Mercia Road/Danegeld Avenue and exit from Retail centre car park is of concern due to the speed at which cars can approach along Saxon Way, the speed of cars exiting both Danegeld Avenue and the Retail Centre Car Park, and the reduced visibility of traffic exiting this junction caused by cars parked on Mercia Road. The proposed additional visitor parking on Mercia Road, together with the increased traffic flow from an additional 95 properties, will make this junction more dangerous to both pedestrians and drivers. Mercia Road is a walking route to Great Denham Primary School for residents from the Cantley Road/Danegeld Avenue end of the development. It is also close to BusyBees Nursery and the Community Hall and its associated traffic flow.

6. Provision of green space and community amenity

We note in Landscaping Plan V55C that the green space requested for community use outside plots 78-95 has been designated to be enclosed with railings. This will limit community use. If railings are to be permitted then access to the space must be provided from Saxon Way (opposite the Community Hall). We also note that the entrance as currently designed will enable children to exit directly onto the Saxon Way/Mercia Road junction, which is already of concern in terms of pedestrian safety (see (5) above).

7. Highways Plan and impact of proposed adoptable areas

We have reviewed document V59C which outlines the areas proposed for adoption by Highways; we assume from this that all unadopted areas will be offered for maintenance by either:

- An arrangement with a Service Management Company such as FirstPort
- Shared responsibility of residents.

From this review we have identified 11 parking areas that will not be adopted by Highways. Please see further comments in (8) below.

Document V59C also indicates that the green space outside properties 78-95 will also be unadopted space. This green area is needed by residents as a community space and therefore should be owned and maintained by the Borough Council, either as adopted space or, as last resort, within the Open Space Management charge levied on properties by the Borough Council. We note that all 95 properties in this application will most likely be charged for Open Space Management. It is our concern that failure to do this will result in a similar situation to the water feature on Ripley Link, the maintenance of which is charged to a large number of residents who obtain no benefit from it.

8. Developer anticipated use of Service Management companies to offset S106 obligations for adoption

We have identified 11 parking areas and the green space outside properties 78-95 that are not included in the adoptable space.

The scheme of service management companies, as set up by the developer, has enabled these companies to levy increasing and unsubstantiated charges on residents, whilst offering no accountability for quality of (and actual) service provided. This is an opportunity to avoid perpetuating this approach, and alternative arrangements must be investigated before determining the application.

9. Impact of construction on residents and residential area

As noted in our comments of July 2021, this area now sits in the heart of an established community and adjacent to both a Primary School and Medical centre. Clear parameters for the operation of construction traffic must be set and adhered to, in consultation with the Parish Council, to minimise the impact on residents. This includes access routes for construction traffic and hours of operation for both delivery and build. It must also include clear provision for constructor traffic parking so that an already congested area is not made worse during the construction period.

The plans do not indicate where the sales office and sales office parking will be located during construction; this is required.

10. Impact of additional housing on infrastructure, including school provision.

It has already been noted in previous comments submitted that an additional 95 properties and their residents will create additional burden on facilities.

- Great Denham Primary school currently has 613 children enrolled, with limited capacity for expansion due to space constraints; this also impacts the school's ability to extend its breakfast and after school offering to children and parents. Consideration must be given to enabling the school to accommodate the increase in population.
- Village Medical Centre and GP provision – additional residents will require access to healthcare; the current provision in Great Denham is not sufficient, and must be expanded in both number of GP and services provided to accommodate the increase in population.
- Secondary School provision – all Great Denham children must access this outside Great Denham, and spaces are limited within reasonable travelling distance. Additional space, close to Great Denham, must be provide.

Proposed Planning Conditions to be included.

In addition to redesign to address the comments, in particular those relating to parking and property layout, the following areas for planning conditions are requested:

1. Location of sales office and sales office parking must not contribute to any on-street parking issues, or significant traffic flow and traffic safety issues; in particular location in relation to road junctions.
2. Measures to reduce traffic speed and to increase and protect pedestrian safety must be included for the junction of Saxon Way/Mercia Road/Danegeld Avenue/ Exit from Retail Centre Car Park before construction is started.
3. Provision for Electric Vehicle Charging points (EVC) must be include for all properties, in line with emerging Neighbourhood Plan and Design Guide.
4. Construction and construction traffic must not impede junctions of visibility of traffic at junctions during the construction period.
5. The Construction Management plan must be discussed with the Parish Council before it is signed off.
6. All and any road damage, including the requirement to keep road surfaces clean and in good condition, must be addressed and made good by the developer.

7. The additional land for the Primary School is required immediately, and must be handed over once the Decision Notice has been issued. The land must be secured and made safe for children on handover and whilst construction is in progress.
8. The developer is asked to mitigate any impact on the Council's CCTV cameras and links back to the CCTV Monitoring Centre which may be caused by this construction as part of its obligations.

Yours faithfully

Clerk – Great Denham Parish Council