



Kent Design Guide Review: Interim Guidance Notes CONSULTATION RESPONSES

Report to the Kent Planning Officers' Group by Bob White
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INTRODUCTION

Publication of Manual for Streets (Department for Transport etc. 2007) has necessitated a review of the Kent Design Guide. Furthermore, publication of Planning Policy Statement PPS3: Housing (Communities & Local Government 2006) heralded a shift in guidance concerning residential parking 'standards' such that local planning authorities are required to produce residential parking policies for their areas.

Three draft Interim Guidance Notes have been prepared by Kent Highway Services on behalf of the Kent Design Initiative, and in liaison with Kent's district councils, as a response to the challenges described above. This report describes the consultation process that has been undertaken in respect of the Notes and lists the responses received, along with recommended actions.

THE CONSULTATION

The draft Interim Guidance Notes were sent to 87 consultees on the Kent Design Initiative database, having regard for their relationship to the Kent Design Guide and the need to follow an appropriate consultation process. In addition, relevant officers within Kent Highway Services and district councils were invited to comment. A six week consultation period commenced in the first week of August 2008. Several responses were received after the closing date, but have been included.

A questionnaire was sent to seek specific responses in relation to the content of each Note. Consultees were invited to make additional comments as appropriate.

Nine separate consultees responded. Their comments are listed below. Where "none" appears under "Issues Raised" it means that the questionnaire was completed such as to support the Note without additional comments being made.

The Kent Design Initiative, along with Kent Highway Services, is grateful to all those who responded and those who considered the Interim Guidance Notes but chose not to comment.

1. QUALITY AUDITS

RESPONDENT	ISSUES RAISED	COMMENTS/ACTIONS
Bovis Homes	Residents' survey results and Stage 4 Road Safety Audits should not be used to seek developer funded alterations to approved schemes, unless significant Health & Safety issues are raised in the former. Who will be responsible for including Design and Access Statements and Quality Audits in residents' Welcome Packs?	Agreed. This is suggested as a way of improving Welcome Packs provided by developers.
Lee Evans Partnership	None.	
Canterbury City Council	There is a lot of jargon. Quality Audits should be given weight over Road Safety Audits. Conservation and Heritage areas need special attention (see existing protocol). Detailed comments about improving guidance on refuse collection and storage.	Text will be reviewed. RSAs inform QAs but do not have greater weight than other aspects. QAs will take into account any special characteristics of sites. Existing guidance will be reviewed and, if necessary, the best way of improving it will be considered.
Royal Tunbridge Wells Borough Council	What is the trigger for using the Development Team approach? District Conservation Officers should be involved in appropriate cases. Do Development Planning Engineers have the necessary urban design skills?	Although the size of the DT may vary according to the size of the development, the approach should be applied to all proposals for new streets/places. Agreed. The LPA Case Officer should assess who needs to be involved. Training and skills sharing will accompany the adoption of this Guidance by KHS. The Kent Design Initiative is likely to organise joint training events.
Jamie Hare, Agreements Team Leader (KHS)	Which engineers have the skills and experience to train others?	Kent Highway Services, in consultation with LPAs, will identify relevant engineers.

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WSP Group	Good communication and cooperation among all parties are needed, as is flexibility on the part of KHS.	Agreed.
Dartford Borough Council	Who leads Quality Audit process, especially if a Development Team is not in place? Formalising and documenting process will improve on existing approach. Reference should be made to Design and Access Statements, which normally identify relevant issues.	The LPA Case Officer will normally lead the QA process. Comment welcomed. Agreed – see mention in connection with Welcome Packs.
Shepway District Council	What size of developments is envisaged? Involvement of more parties may be impractical.	All 'placemaking' proposals should be subject to approach, but with flexible use to meet time constraints.
Barton Willmore & Odyssey Consulting Engineers	More information about the surveys is needed. How do Quality Audits relate to Design & Access (D&A) Statements? Procedure for Quality Audits is not clearly set out. Relationship between LPA Case Officer and Development Team, including responsibility for making recommendation, needs to be clarified. Criteria for use of Development Team needed. Historically, some Development Planning Engineers seek changes at adoption stage. Timing of Quality Audits must assist with timely determination of applications – need to include pre-planning stage in checklist. D&A Statements often lengthy – better to include web link in Welcome Pack.	More information will be released soon. D&A Statements will inform QAs. Principles are more important than procedures. LPA Case Officer retains responsibility, but DT will be a significant 'consultee'. DT principles needed for all proposals with placemaking content, but approach remains flexible. The aim is to eradicate unreasonable post-planning changes. Agreed. Agreed.

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2. VISIBILITY

RESPONDENT	ISSUES RAISED	COMMENTS/ACTIONS
Bovis Homes	None.	
Lee Evans Partnership	None.	
Canterbury City Council	Concern that Guidance Table could become <u>the</u> standard.	Using the Development Team approach (see Quality Audits), discussion of all relevant issues will occur. If there is a good reason for departing from the Table it will be identified and recorded.
Royal Tunbridge Wells Borough Council	Need to arrange workshop for all relevant practitioners to discuss flexible approach and prepare to monitor implementation.	Agreed. Visibility will figure in the proposed training/skills sharing sessions.
Jamie Hare, Agreements Team Leader (KHS)	Should the reduction in skid resistance over time be considered?	This will figure in the assessment of risks associated with using lesser distances.
WSP Group	Approach should apply in all cases where 85 th percentile speeds are 37mph and below. Above this, a higher driver perception/reaction time is suggested for County road situations, leaving DMRB standards for trunk roads and the like. Flexible application of splays according to site specific circumstances should be encouraged.	Agreed – Note has been amended. Such flexibility will be encouraged.
Dartford Borough Council	None.	
Barton Willmore & Odyssey Consulting Engineers	Guidance on SSD at private drives and uncontrolled pedestrian/cycle crossings needed. Speed measurements should be taken at all sites on existing 30 mph streets. MfS table goes up to 37 mph. It is hoped that the IGN will reduce inconsistencies among KHS engineers.	There is no good reason for recommending different values. May be unnecessarily onerous, but if actual speeds are lower than 30 mph there may be design benefits. Checklist will be amended. Agreed. Agreed.

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3. RESIDENTIAL PARKING

RESPONDENT	ISSUES RAISED	COMMENTS/ACTIONS
Bovis Homes	None.	
Lee Evans Partnership	None.	
Canterbury City Council	None.	
Royal Tunbridge Wells Borough Council	Concerned that town centre maximum could be used to thwart good design. Need to encourage zero parking in appropriate circumstances.	Text to be reviewed to ensure that town centre constraints and opportunities for the most efficient use of land are clear.
WSP Group	Detailed concerns about the possibility of inflexible application, and references to departures from the DCLG Research Report methodology and MfS comments on garages.	The growing evidence base challenges the DCLG Research Report methodology while highlighting serious problems associated with under-providing in the absence of effective controls. With good design as the highest priority, the Guidance offers a relatively simple but also realistic approach to avoiding such problems in the future.
Dartford Borough Council	Concern about how Interim Guidance Notes will be adopted. In particular, weight of IGNs against adopted Supplementary Planning Guidance that has been through full consultation.	This is under investigation, but initial view is that early adoption for development control purposes may be possible. KHS will adopt agreed guidance immediately.
Shepway District Council	Councillors will resist any further reduction in parking requirements. Existing parking problems need to be acknowledged. Welcome change to minimum standards for some locations. Impractical to go through checklist for some applications.	The guidance should not lead to reductions where such would cause problems. Existing problems are informing the approach. This is one way of avoiding historic problems. Agreed – principles and not detail will apply to minor applications.

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<p>Barton Willmore & Odyssey Consulting Engineers</p>	<p>More information about the surveys is needed. Approach isn't flexible enough.</p> <p>Influences of location and tenure are not properly discussed.</p> <p>'Minimum standards' questioned in light of sustainability and efficient use of land, and PPG13 Section 49 & 51.</p> <p>How will LPAs define zones used in Guidance Table?</p> <p>Checklist needs to allow for all influences on parking demand – additional bullet point suggested.</p> <p>Need to enlarge upon allocation/non-allocation.</p> <p>Separate section on affordable housing needed. Car ports/barns as alternative to garages.</p>	<p>More information will be released soon. There is plenty of flexibility, but designers must avoid repeating past mistakes.</p> <p>Agreed regarding retirement properties, but not regarding affordable housing.</p> <p>PPS3 is subsequent to PPG13 and seeks to address problems that are very evident in survey results.</p> <p>This can be done in liaison with KHS and districts' own Parking Services.</p> <p>Influences without controls may reduce use but not necessarily ownership.</p> <p>Agreed. The CLG Report favours non-allocation but the market still seems to favour allocation. There is no tangible benefit in enlarging upon this. See Note in Guidance Table.</p>
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The most recent 'evidence base' tables for residential parking are included at Appendices A & B

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THE SURVEYS

The Residents' Surveys referred to in the Quality Audits and Residential Parking Interim Guidance Notes were commenced in August 2007 and now embrace over 1,400 responses from about 60 sites representing all of Kent's district council areas. The methodology and substantial outputs will be the subject of separate reporting. The evidence base for Residential Parking is the subject of liaison with others working in this field at county and national levels.

It is intended that all sites will be subject to such surveys upon reaching substantial completion. This will ensure that the evidence base is developed and refreshed, and that the quality of new developments is the subject of ongoing assessment and continuous improvement.

PURPOSE AND ADOPTION

IGN 1 – QUALITY AUDITS

This Note enlarges upon the Development Team approach advocated by the Kent Design Guide. Once approved, it will be adopted by Kent Highway Services. Adoption for Development Control purposes by district councils would strengthen its use.

IGN 2 – “VISIBILITY”

Primarily for designers and KHS Development Planning Engineers, this Note aligns the Kent Design Guide with national guidance on stopping sight distances. Its contents are already in use elsewhere and adoption for Development Control purposes should not be contentious.

IGN 3 – RESIDENTIAL PARKING

There is an urgent need to respond to PPS3 for Development Control purposes while informing the preparation of residential parking policies for Local Development Frameworks. This is an evidence based approach which has full regard for national guidance. All those involved in the development process will benefit from using it.

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RECOMMENDATIONS

It is recommended that

- A. The revised “Visibility” Note is approved for immediate use by designers and Kent Highway Services. It will be circulated to the original Kent Design Initiative consultees, along with all relevant development partners.
- B. The Quality Audits and Residential Parking Notes should be revised to reflect certain consultation responses and circulated for further consideration, having regard for the fact that much of their content reflects national guidance and can be used immediately.
- C. Advice be sought concerning how the Notes can be adopted as interim amendments to the Kent Design Guide and to the Residential Parking standards in the Kent & Medway Structure Plan Supplementary Planning Guidance.

CONCLUSIONS

The Kent Design Initiative and Kent Highway Services are grateful for the constructive responses listed above. Furthermore, consideration will be given to whether job titles and their acronyms can be simplified, reflecting a comment made about presentation. It has been suggested that policy and procedure could be separated more clearly; the text will be reviewed in the light of this.

The consultation exercise has largely lent support to the Interim Guidance Notes. Minor amendments will be made, along with inclusion of the latest results from the residents’ surveys. A further period of consultation will follow prior to adoption by Kent Highway Services, Kent Design and, it is hoped, district councils, using the appropriate adoption mechanisms. Medway Council may wish to adapt the Notes for its own purposes, given their relationship to the Kent Design Guide.

The Interim Guidance Notes represent the Kent Design Initiative’s response to Manual for Streets, pending preparation for consultation of a review of the Kent Design Guide itself. It is likely that such a review will endorse the Guide’s overall approach, but amend specific areas of technical guidance and terminology to bring it in line with recent research and current thinking.

RESIDENTS' SURVEYS: PARKING (ASHFORD – GRAVESHAM)

DISTRICT Development	PARKING RATING (Note 1)	PARKING PROBLEMS (Note 2)	VEHICLES PER UNIT	2001 CENSUS VEHICLES PER UNIT	GARAGE USED FOR PARKING	COMMENTS
ASHFORD						
Highland Park (part)*	-76%	+79%	1.40	1.36	59%	Need to check for covenants/agreements re parking
Orlestone View	-57%	+52%	1.38	1.73	43%	
Sir John Fogge Avenue	-43%	+30%	1.61	1.40	53%	
CANTERBURY						
Aurelie Way	+15%	-54%	1.46	1.35	25%	
Barnes Way	-40%	+28%	1.56	1.39	33%	
Blackberry Way	+60%	-60%	1.75	1.39	33%	
Canterbury Fields	+15%	-10%	1.48	1.49	50%	
Chartham Heights (V Core)	+12%	-8%	1.68	1.65	51%	
Eversleigh Rise	+16%	-18%	1.50	1.35	37%	
Gilbert Way	+10%	+14%	1.33	1.21	45%	
Scott Ave & Birch Rd	+45%	-27%	1.27	1.21	50%	Design led approach to parking, including on-street
Wallis Court	-63%	+75%	1.63	1.39	(0%)	Parking problems relate primarily to nearby school
West of Hersden	-21%	+29%	1.51	1.62	42%	Village extension in mainly rural ward
DARTFORD						
Bexley Park (part)	-21%	+26%	2.08	1.56	56%	
Palladian Circus*	-29%	+43%	1.52	1.50	50%	
Waterstone Park (part)*	-39%	+50%	1.41	1.50	47%	
DOVER						
Sandwich Road, Ash	-44%	+31%	1.78	1.35	41%	
GRAVESHAM						
Fenners Marsh*	+13%	-7%	1.33	1.11	67%	
Kendall Gardens	+7%	+29%	1.14	1.25	(50%)	
Rosherville Way (part)	+9%	-6%	1.72	1.25	62%	
<i>Admirals Way**</i>	n/a	+22%	1.09	0.78	n/a	
<i>Baltic Wharf**</i>	n/a	+90%	1.05	0.84	n/a	n/aClose to town centre
<i>Covesfield*</i>	n/a	-42%	1.33	1.25		

CENSUS data is average for owner-occupied houses except those in italics, which is average for owner-occupied flats.

* Developments with a significant proportion of flats, for which average vehicle ownership rates are lower.

** Developments with flats only.

Note 1 ("GOOD" + "VERY GOOD") – ("POOR" + "VERY POOR")

Note 2 "YES" – "NO"

RESIDENTS' SURVEYS: PARKING (MAIDSTONE – TONBRIDGE & MALLING)

DISTRICT Development	PARKING RATING	PARKING PROBLEMS	VEHICLES PER UNIT	2001 CENSUS VEHICLES PER UNIT	GARAGE USED FOR PARKING	COMMENTS
MAIDSTONE						
Edelin Road*	-85%	+85%	1.46	1.51	(25%)	25% of properties not occupied at time of survey
Shaw Close	-76%	+76%	1.97	1.43	45%	
SEVENOAKS						
Bentleys Meadow (H Zone)	-18%	+27%	1.45	1.90	n/a	Housing association development in mainly rural ward
Parsonage Bank	0%	+50%	1.63	1.61	n/a	Close to village centre
The Beeches	+18%	-12%	1.64	1.61	51%	Close to two railway stations, edge of town
The Sidings*	-31%	+50%	1.19	1.52	(17%)	Adjoins railway station on edge of settlement
SHEPWAY						
Terlingham Village (Ph 1)						(In progress 7/10/08)
SWALE						
Finch Close	-83%	+100%	1.45	1.34	10%	
Hilton Close	-28%	+44%	1.59	1.34	58%	
Orchard Edge	-75%	+81%	1.62	1.76	36%	Need to check for covenants/agreements re parking
THANET						
Brindle Grove	+14%	+43%	1.79	1.13	31%	Fairly close to station and bus routes
Chantry Park	-44%	+44%	2.11	1.54	45%	Village location
College Gardens	0%	-9%	1.73	1.18	78%	Moderate walk to shops & station; bus route passes site
TONBRIDGE & MALLING						
Anisa Close	-50%	+60%	2.00	1.89	90%	Close to commercial centre of Kings Hill
Busbridge Close	+17%	-33%	2.08	1.58	58%	Fairly close to station
Friars View	-50%	+40%	1.85	1.71	42%	On-street problems blamed on flat occupiers
Lacuna (part) (1) & (2)*	-67%	+81%	1.39	1.89	76%	Need to check for covenants/agreements re parking
Milton Lane	-81%	+62%	1.67	1.89	68%	Need to check for covenants/agreements re parking
McArthur Drive	-23%	+44%	1.57	1.89	69%	Need to check for covenants/agreements re parking
The Gables, Friars View**	-89%	+33%	1.22	<i>n/a</i>	n/a	On-street problems blamed on house occupiers
Upper Mill	0%	-12%	1.44	1.58	n/a	Fairly close to station
TUNBRIDGE WELLS						
Blackberry Way	+22%	-56%	1.44	1.51	58%	Cul-de-Sac off Green Lane
Green Lane	+50%	-85%	1.68	1.51	51%	

CENSUS data is average for owner-occupied houses except those in italics, which is average for owner-occupied flats.

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Note 2 “YES” – “NO”