



## **Parking Standards Evidence Report**

Milton Keynes Council

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## 1. **INTRODUCTION**

- 1.1.1 Project Centre Ltd. (PCL) has been commissioned by Milton Keynes Council (MKC) to gather evidence and undertake a review of the existing parking standards for Houses in Multiple Occupation (HMO) and Build to Rent (BTR) proposals in Milton Keynes.
- 1.1.2 This report will include a review the parking requirements for HMOs, and the suitability of the current standards and two-zone approach contained in the Milton Keynes Parking Standards SPD.
- 1.1.3 The report also gathers evidence on parking requirements for BTR properties. The existing applicable parking standards have been reviewed, and research undertaken on the direction of travel for ownership and provision at BTR schemes.
- 1.1.4 The evidence gathering exercise has included collecting feedback from local HMO lettings agents and BTR property managers. An accessibility review of Milton Keynes has also been conducted to feed into the report findings and provide a framework for constructing draft parking standards for consideration.

## 2. HOUSES IN MULTIPLE OCCUPATION

2.1.1 The following chapter conducts a review of the existing parking requirements for Houses in Multiple Occupation (HMO) and their suitability. The chapter will then recommend an approach for HMO parking.

### 2.2 Existing Policy

#### *Article 4 Directions*

2.2.1 The General Permitted Development Order (GPDO) is a UK-wide legislation that grants automatic planning permission for certain development categories. In October 2010, this was amended to include changes of use from C3 dwelling houses to C4 HMOs. Notwithstanding this, the Government announced that local authorities could use their existing Article 4 powers to retain planning control of HMO change of use.

2.2.2 In December 2010, MKC introduced an Article 4 directions covering the Milton Keynes urban area. In December 2011 this was then expanded to cover the entire Borough.

2.2.3 This means planning permission is required when converting a dwelling house (C3), or non-residential property, to a Use Class (C4) HMO anywhere within the Borough.

#### *Houses in Multiple Occupation SPD*

2.2.4 This Supplementary Planning Document (SPD) was adopted on 10<sup>th</sup> April 2012. The document sets out the Council's approach to considering applications for a change of use to an HMO.

2.2.5 For planning purposes an HMO is defined in two ways:

- **Use Class C4 HMO:** a property which is occupied by 3-6 **unrelated** individuals (meaning occupants do not have a relationship by blood, marriage or co-habitation), who share one or more basic amenities (meaning cooking facilities (such as kitchens), personal washing facilities (such as bathrooms and toilets).
- **Larger HMOs:** Properties occupied by more than six people would not sit in Use Class C4 and may therefore be Sui Generis (in a class of its own), for which any change of use requires planning permission. It must be noted that a property does not automatically become a Sui Generis use just because it has more than six occupants. A change of use has to be "material" and it is possible that individual circumstances may mean that an HMO with, for example, seven people could be assessed as not being materially different from a six person HMO. In which case, a material change of use has not occurred and planning permission would not be required.

2.2.6 The SPD highlights two distinct differences in Milton Keynes;

- the older estates surrounding Central Milton Keynes (CMK) generally benefit from wide, straight boulevards with central communal parking areas. These can accommodate an intensification of use due to parking availability, and the proximity of employment, services and amenities in CMK.
- the newer estates located further from CMK do not generally lend themselves to significant increases in parking pressures. The roads are often narrower than, and not as straight as, the older estates. This inhibits the capacity for on-street parking in such locations, and off-street parking is often limited. In addition to this, services and employment opportunities are not as accessible, and so residents are more likely to require a car.

2.2.7 In addition to the above, evidence-gathering work undertaken to support the HMO SPD<sup>1</sup> identified that 30.6% of HMO occupants either walked to work or travelled by public transport, and 40% did not have access to a car compared to the average 19.2% of households across Milton Keynes.

2.2.8 The council has seen a large rise in planning applications for changes of use from residential dwellings to Houses in Multiple Occupation. All applications for a change of use to HMO are judged against the Council's Development Plan Policies, including Plan: MK (adopted March 2019) Policy HN7 which states proposals must comply with the HMO SPD.

2.2.9 Regarding parking, the HMO SPD states

*"It is important to ensure that adequate parking is provided for prospective residents so as to avoid traffic problems. Traffic problems can arise from a lack of parking which causes traffic obstructions, congestion and harms the amenity of the local area." (HMO SPD, 4.10)*

2.2.10 Parking requirements for new HMO properties in Milton Keynes follow a two-zone approach based on the zone map shown overleaf.

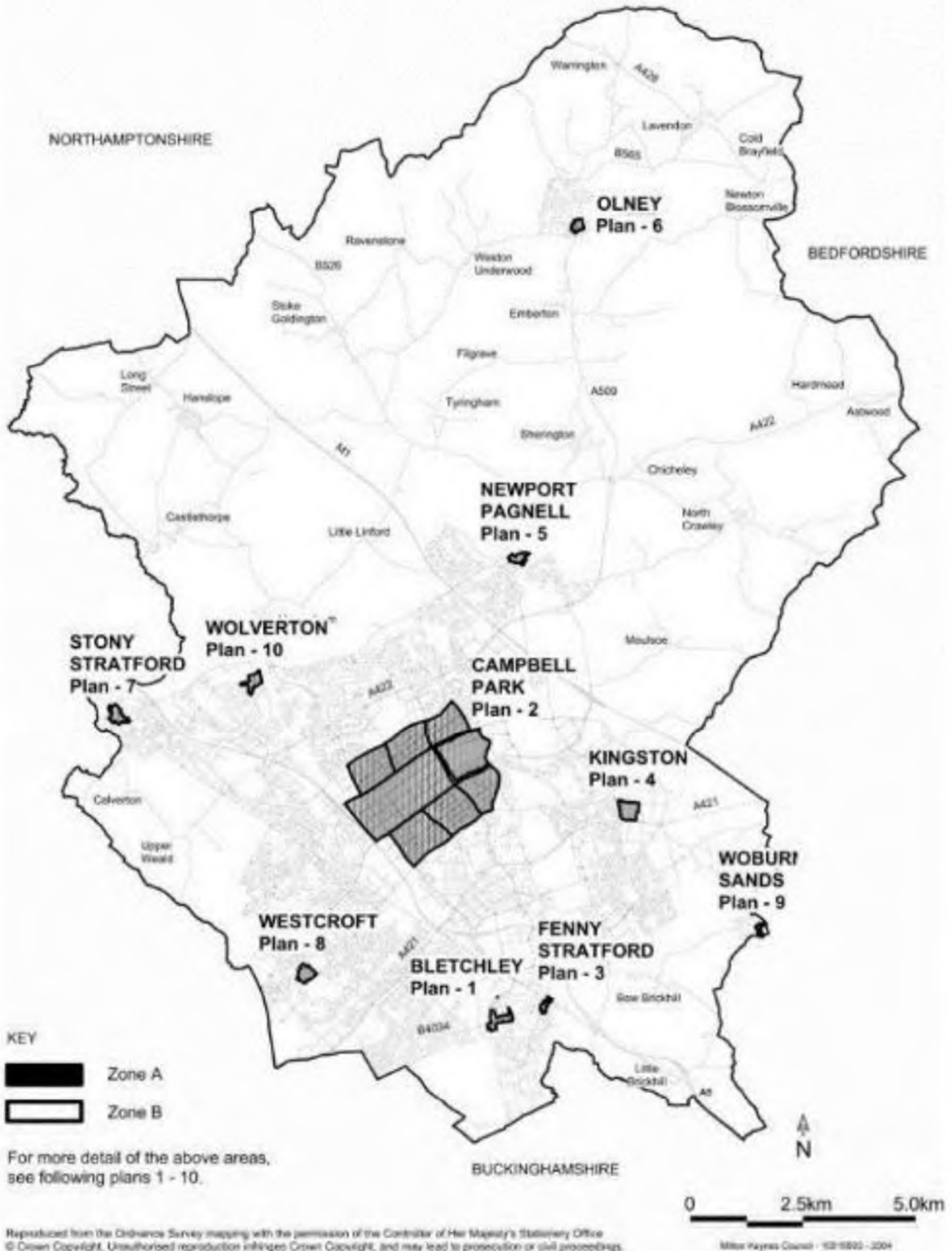
- **Zone A** (Town and District centres and the estates surrounding CMK): **0.5 parking spaces per bedroom**
- **Zone B** (all other areas where public transport is more limited): **parking is based on the formula n-1, where n = number of bedrooms** (eg. 6 bedrooms = 5 spaces)

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<sup>1</sup> HMO SPD Supporting Evidence and Regulation 17 Documents, October 2011  
[https://www.milton-keynes.gov.uk/assets/attach/9519/HiMO\\_Evidence\\_Paper\\_FINAL\\_reduced\\_file\\_size.pdf](https://www.milton-keynes.gov.uk/assets/attach/9519/HiMO_Evidence_Paper_FINAL_reduced_file_size.pdf)



**PARKING STANDARDS AREA ZONES**  
*Zone Map for Houses in Multiple Occupation*



2.2.11 Table 1 summarises the required spaces by bedrooms for HMO properties

**Table 1: HMO SPD Table of Parking Standards**

Proposed number of bedrooms	Parking Spaces Required	
	Zone	
	A	B
3	2	3
4	2	3
5	3	4
6	3	5
7	4	5

*Note: The Council does not count garages as a parking space.*

2.2.12 The SPD states that;

*“If an application for a HiMO is submitted with on-plot parking provision below the required levels, it will normally be refused unless the applicant can demonstrate that the shortfall can be satisfactorily accommodated within properly marked, or laid out, parking spaces in the highway fronting the site.” (HMO SPD, 4.15)*

2.2.13 Parking in spaces remote from the site and not within the surveillance of the site will not normally be acceptable.

2.2.14 Regarding kerbside parking the SPD notes it cannot set out every circumstance where kerbside parking is or is not acceptable and it will often depend on the circumstance of each individual application.

2.2.15 For on-site (on plot) parking, the SPD specifies the following required characteristics:

- Spaces should be a minimum of 5m x 2.5m;
- Each space must be independently accessible (no ‘tandem’ parking)
- Spaces directly accessed from the highway must have an appropriate dropped kerb crossover;
- Spaces in front of garages or doors to dwellings must have an additional clear area of at least 1m beyond the space to allow for access;



- A clear path of 1.2m should be maintained between the highway and the dwelling entrance;
- Access to spaces must not involve driving along footways or redways;
- Parking on shared accesses and driveways is not acceptable.

## 2.3 Comparator Authorities

2.3.1 A review of comparable authorities has been conducted to understand how Milton Keynes' requirements for HMOs compare.

2.3.2 The following authorities have been chosen for comparison. These have been selected due to their similar sizes, geographies and transport connections – particularly commuter connections to London;

- **Luton**
  - 220,000 population
  - London rail connections
  - Bordered by M1
- **Stevenage**
  - 90,000 population
  - London rail connections
  - Largely residential with retail centre & small local centres
  - Bordered by A1 (M)
  - Planned new town
- **Bedford**
  - 173,000 population
  - London rail connections
  - University of Bedfordshire campus
- **Northampton**
  - 215,000 population
  - London rail connections
  - Bordered by M1
- **Hemel Hempstead**
  - 98,000 population
  - Planned new town
  - Largely residential with retail centre
  - Bordered by M1
  - London rail connections

2.3.3 Table 2 below summarises the planning policy, and where relevant parking standards for HMOs in each comparator authority.

**Table 2: Comparator Authority HMO Parking Standards**

Authority	Article 4 Direction?	HMO Parking Policy
Luton	No*	No specific standard for HMO parking. Local Plan Policy LLP17 states permission will be granted where appropriate parking provision is provided.
Stevenage	Yes	<p><b>0.5 spaces per tenancy unit.</b></p> <p>Areas with higher accessibility are subject to reduced maximum standards based on 4 accessibility zones;</p> <ul style="list-style-type: none"> <li>■ Town Centre: 0-25%</li> <li>■ Zone 1: 25-50%</li> <li>■ Zone 2: 50-75%</li> <li>■ Zone 3: 75-100%</li> </ul> <p>Within each range, the higher percentage represents the maximum level of parking provision.</p>
Bedford	Yes	<p>Came into force on 22<sup>nd</sup> November 2020. No specific standards have been drafted yet.</p> <p>Bedford Parking Standards SPD defines <b>minimum</b> residential standards:</p> <ul style="list-style-type: none"> <li>■ 1 space per 1 bed</li> <li>■ 2 spaces per 2/3 bed</li> <li>■ 3 spaces per 4+ bed</li> </ul> <p>It states that “Applications for the development of, or conversion to, houses in multiple occupation (HiMO) will be considered on their merits.”</p>
Northampton	Yes	<p><b>One on-plot car parking space per bedroom</b></p> <p>For HMO applications where the car parking standard cannot be met in full, the planning application must be supported by a parking beat survey.</p> <p>It is accepted that reduced or limited levels of car parking provision (but not cycle parking provision) will be applicable in accessible locations such as:</p> <ul style="list-style-type: none"> <li>■ The town centre, district centres, local centres, and neighbourhood parades</li> <li>■ Areas where buses are easily accessible</li> </ul>
Hemel Hempstead (Dacorum Borough Council)	No*	<p><b>0.5 spaces per bedroom</b></p> <p>The standard is neither maximum nor minimum. Reductions based on accessibility are assessed on an individual case basis</p> <p>When assessing planning applications, the Council will seek to ensure that the proposals provide adequate levels of car parking to meet the future standards of the likely occupants. Where possible, the car parking should be provided off street.</p>

\* Changes of use from C3 to C4 are permitted development. Does not apply to new purpose-built HMOs or changes from other use classes.

## 2.4 HMO Consultations

- 2.4.1 A consultation exercise was conducted with local agencies that market and manage HMO properties. A total of eight agencies that operate within Milton Keynes were approached with a questionnaire regarding parking for HMO properties. The full questionnaire and consultation email is included in Appendix A.
- 2.4.2 Table 3 summarises the approach taken and response to the consultation exercise.

**Table 3: Consultation Attempts and Response**

Company	Areas Covered	Consultation Attempts			Outcome
		1 <sup>st</sup> contact	2 <sup>nd</sup> contact	3 <sup>rd</sup> contact	
Peace of Mind Lettings	Specialise in HMO management in Milton Keynes.	12 <sup>th</sup> January 2021: Questionnaire sent	25 <sup>th</sup> January 2021: Reminder email	9 <sup>th</sup> February 2021: Phone calls to each agency to draw attention to consultation	No response
MK Lettings	Milton Keynes focussed				No response
Bourdeaux	Milton Keynes focussed				No response
Haart	UK-wide, including Milton Keynes				No response
Northwood Estate Agents	Milton Keynes focussed				Confirmed not interested in participating
Brick House Properties	Milton Keynes & Hockliffe focussed				No response
Taylor Walsh Property Consultants	Milton Keynes, Lincoln & Surrounding Areas				No response
Affinity Lettings	Milton Keynes & surrounding Areas				N/A

- 2.4.3 As shown above, the consultation received limited engagement. However, two separate responses were received from the same agency; the full anonymous responses are included in Appendix B.
- 2.4.4 The key conclusions of the consultation exercise were:
- The tenants in HMOs they manage rarely own cars;

- Car ownership in HMOs is particularly low in the less affluent estates;
- The current parking standards mean that suitable shared accommodation cannot go ahead, and parking goes unused;
- MK's current HMO zones A & B do not appropriately distinguish between the characteristics of the areas;
- Car parking is "not at all important" for tenants or landlords of HMOs in both zones A & B;
- Parking is very rarely requested by tenants;
- Requests for bicycle storage are more common;
- Access to Redways, bus routes and taxis are more important to tenants;
- Providing parking to meet the current HMO standards is very difficult. There is a lack of available space, and the new estates have limited off-street parking;
- Refusing permission for good quality shared accommodation due to lack of parking is not sensible, as demand for rooms is high and demand for parking is low;
- Suggestion to add a licencing limit on number of vehicles per HMO property, and landlords can then select tenants accordingly;
- Suggestion to take away minimum parking requirements.

## **2.5 Planning Applications**

2.5.1 To understand how the current parking standards function in the planning system, 10 recently granted applications for HMO property conversions have been reviewed.

2.5.2 Table 4 summarises the reviewed applications in relation to parking. The review indicated the following patterns;

- Eight of the applications attracted public objections citing parking pressures as a key concern.
- Objections based on parking totalled 33 across the eight applications, including Councillor and Parish Council objections.
- Six of the applications were unable to meet the required parking standard on-site.
- Four sites were located in 'Zone A' for parking standards, all of which were within Central Milton Keynes. No sites were located in the other 'Zone A' centres.
- Six of the applications were initially refused permission, five of which were refused all or in part due to parking. All of these were then allowed at appeal.

Table 4: HMO Planning Application Review

Application Reference	Site Address	Lettable Rooms	Policy Requirement		On-Site Parking	Objections Citing Parking	Allowed at Appeal	Initial Refusal	Appeal Findings
			Zone	Spaces					
18/00640/FUL	2 Verity Place, Oldbrook, MK6 2QF	4	Zone A	2	2	1	Yes	Over-concentration of HMOs. Parking not a reason for refusal, although noted in appeal findings.	Interested parties have expressed concern over an increase in parking problems in the area. However, there is a hard-surfaced area capable of accommodating two parked cars at the front of the appeal property, with other off-street and on-street provision available in the surrounding area. As the appeal property is in an accessible location in relation to the town centre, it is also possible that some of the occupants may walk or cycle and not require a car, thus reducing the requirement for additional car parking. The Council did not object to the change of use on the grounds of a deficiency in parking provision and no reason is found to disagree with them.
16/01734/FUL	4 Herdman Close, Greenleys, MK12 6AD	5	Zone B	4	4	8	Permission granted		
18/02088/FUL	56 Eridge Green, Kents Hill, MK7 6JE	6	Zone B	5	4	7	Permission granted		
17/00432/FUL	11 Church Street, Blechley, MK2 2NY	4	Zone B	3	3	2	Permission granted		
17/02086/FUL	30 Sheelin Grove, Blechley, MK2 3PQ	4	Zone B	3	1	0	Permission granted		
18/01881/FUL	11 Vernier Crescent, Medbourne, MK5 6FD	6	Zone B	5	2	3	Yes	Lack of on-site parking – 2 spaces below required standard.	Appeal allowed due to evidence of sufficient kerbside parking availability and public transport accessibility of the site.
18/01186/FUL	10 Polmartin Court, Fishermead, MK6 2JL	6	Zone A	3	3	0	Yes	3 spaces proposed are not considered practical due to lack of manoeuvring space.	Space for 2 independently accessible spaces on-site. Shortfall of 1 space, which can be accommodated on-street.
18/00592/FUL	4 Rothersthorpe, Giffard Park, MK14 5JL	5	Zone B	4	3	8	Yes	No highways objection due to the existing use (C3 dwelling house) providing 1 space below adopted standards. Therefore, no grounds to object to an HMO providing 1 space below However, despite recommendation to grant permission, the application was refused at committee due to insufficient parking.	Appeal allowed as the minor shortfall of parking provision against the Council's standards is unlikely to result in additional on-road parking that prejudices highway safety or that causes any other harm.
19/01003/FUL	52 Bossiney Place, Fishermead, MK6 2EG	5	Zone A	2.5	0	1	Yes	Highways objection, as the property has no on-site parking and is therefore dependant on street provision. The applicant identified 3 on-street parking spaces near the property. However, these are unallocated spaces, and it is not clear that parking to service this HMO can be satisfactorily accommodated.	The existing dwellinghouse would require 2 spaces for policy compliance. The HMO would require 2.5. Considering the existing dwelling's lack of parking provision, the proximity to on-street parking and the range of alternative means of transport, including walking to access nearby services, it is considered that the development would accord with policy CT10 of the LP as the lack of on-site parking would not result in an unacceptable level of additional pressure on offsite parking.
20/03233/FU	78 Brill Place Bradwell Common Milton Keynes MK13 8LR	5	Zone A	2.5	3	3	Yes	Highways object due to insufficient land within the applicant's control. Objection overridden due to accessible location, on-street parking and citing precedent. Appeal 19/010003/FUL	The proposal would also accord with the HMO SPD, as the shortfall of parking can be satisfactorily accommodated within properly marked, or laid out, parking spaces in the highway.

- 2.5.3 The above review suggests there is a disconnect between public perception of HMO parking demand and the experience of HMO letting agencies (as discussed in section 2.4). Applications gathering the strongest public reactions and most objections were all located in Zone B, outside of CMK.
- 2.5.4 The review also suggests a recurring pattern of Highways objections being overridden at appeal; it is noted that application 20/03233/FU did not go to appeal despite a Highways objection due to this precedent. This suggests that comments are bound to restrictive standards, with limited flexibility afforded to Highways officers for assessment of individual cases.
- 2.5.5 The appeal process considers the wider accessibility of the site as well as kerbside parking availability. Whilst the current HMO parking standards make some allowance for kerbside parking, it is restrictive, stating:
- “If an application for a HMO is submitted with on-plot parking provision below the required levels, it will normally be refused unless the applicant can demonstrate that the shortfall can be satisfactorily accommodated within properly marked, or laid out, parking spaces in the highway fronting the site.” (HMO SPD, 4.15)*
- 2.5.6 The statement that a shortfall of on-plot spaces will normally be refused is considered restrictive to planning, as Highways officers are bound by the current standards for on-plot parking which, as shown in Table 4, are not achievable in the majority of cases. The difficulty of achieving on-plot parking is backed up by letting agent feedback in Section 2.4.

## **2.6 Parking Zone Suitability**

- 2.6.1 The standards currently make limited allowance for individual consideration of accessibility. A two-zone approach is taken towards setting parking standards, and the HMO SPD states that:
- “Zone A relates to Town and District centres and the estates surrounding CMK, where the existing housing stock has good access to facilities and availability of support networks and public transport. Zone B is all other areas outside the Town and District centres where access to services and public transport is more limited.” (HMO SPD, 4.14)*
- 2.6.2 The licenced HMO public register<sup>2</sup> has been interrogated to understand the distribution of HMOs within the two zones. Figure 1 illustrates all licenced HMO properties in Milton Keynes.

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<sup>2</sup> <https://www.milton-keynes.gov.uk/housing/private-housing-and-landlords/hmo-licensing?chapter=9>


**Figure 1:**


## Registered Houses in Multiple Occupation

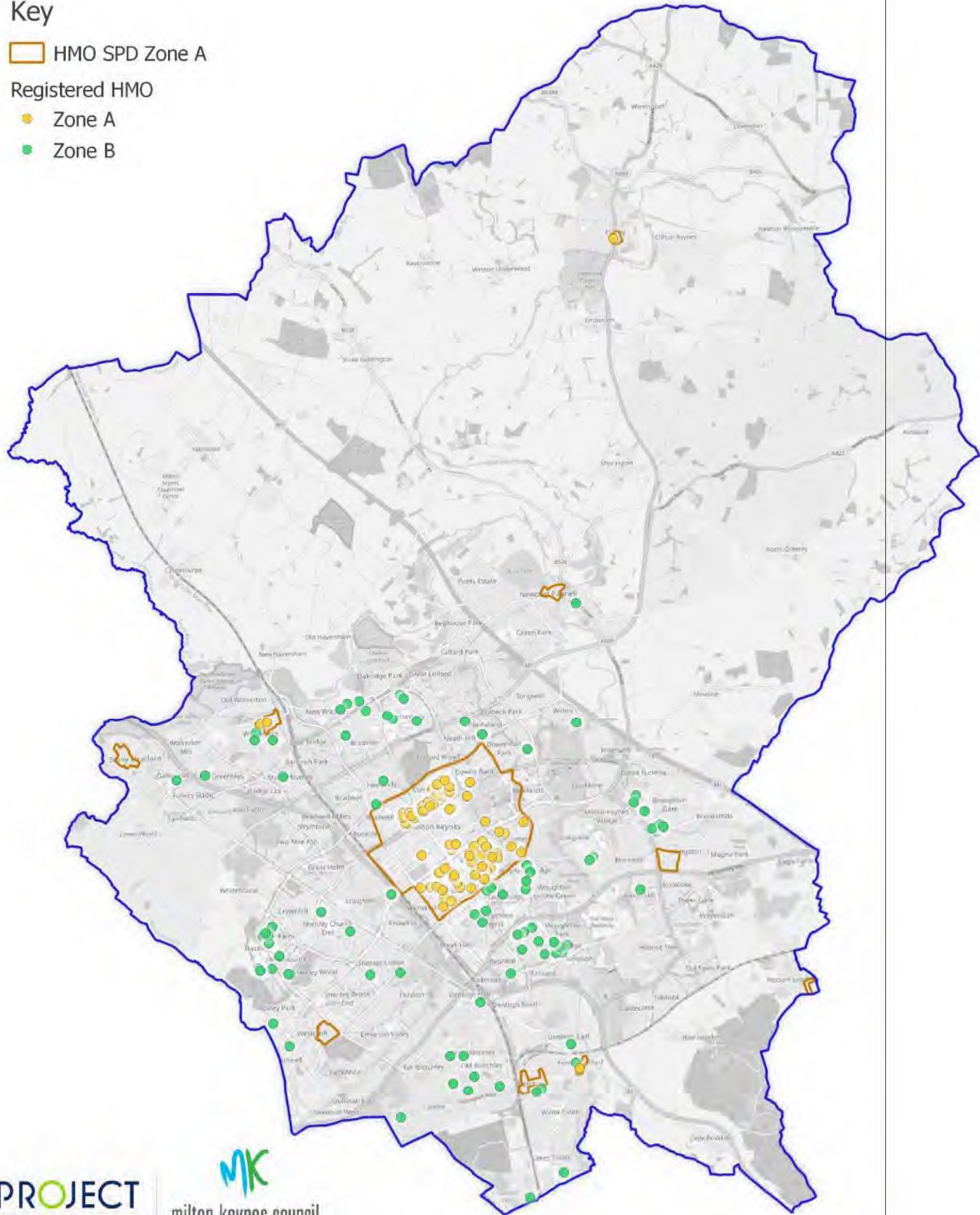
### Key

 HMO SPD Zone A

Registered HMO

 Zone A

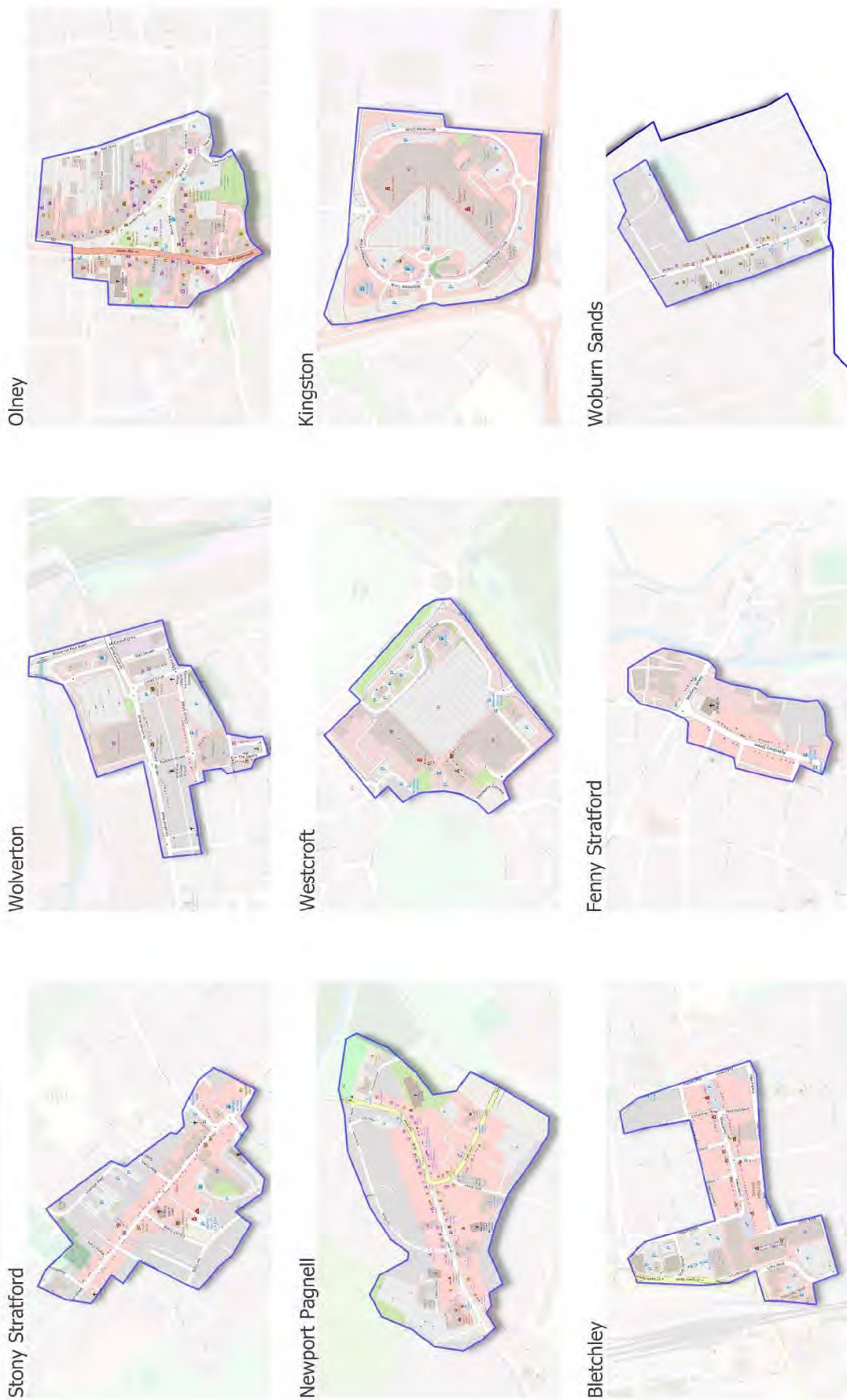
 Zone B



- 2.6.3 Of 417 licenced HMOs, 66% (276) are located within Zone A. Of those in Zone A;
- 272 are located in CMK;
  - 3 are located in Wolverton Centre; and
  - 1 is located in Fenny Stratford.
- 2.6.4 The Outer Zone A locations therefore have a limited catchment, which is in part due to the tight boundaries surrounding the town & district centres.
- 2.6.5 The zone boundaries capture the district centres themselves, which are predominantly retail and business, and neglect to encompass surrounding residential areas that are easily accessible to these facilities. This is illustrated in Figure 2 overleaf.
- 2.6.6 This is most apparent in Westcroft and Kingston, for which the boundaries encompass only the retail parks and no residential land uses are within them. The zones therefore require revision to consider residential areas within an acceptable walking distance of these centres.
- 2.6.7 Furthermore, the Outer Zone A areas, although benefiting from local amenities and facilities, are not comparable to CMK and the more urban and connected areas such as Bletchley and Fenny Stratford. Locations such as Olney and Woburn Sands in particular are independent of CMK, are more rural and have limited public transport connectivity. It is therefore not appropriate that CMK and these locations have equivalent parking standards.



**Figure 2:**  
HMO Zone A - Outer Areas



## **2.7 Accessibility Review**

### *Public Transport*

- 2.7.1 To enable future HMO parking standards to consider public transport accessibility, a review of the public transport network has been undertaken using Geographic Information System (GIS) software.
- 2.7.2 All public transport access points (rail stations and bus stops) in Milton Keynes were analysed to determine the "Average Wait Time" (AWT) per station / stop<sup>3</sup>.
- 2.7.3 The AWT is defined as the average time between when a passenger arrives at a stop or station, and the arrival of the desired service. Passengers are assumed to arrive at random for the purpose of this assessment. For each service in Milton Keynes<sup>4</sup>, the scheduled waiting time (SWT) is calculated as half of the scheduled frequency (in minutes). A reliability factor is then applied to calculate the AWT; this is to account for variations in regularity caused by a variety of factors. Buses are worse affected by variations than trains, and therefore to allow for reliability additional wait times assumed are 2 minutes for buses and 0.75 minutes for rail services.
- 2.7.4 The AWTs per service were then applied to each stop / station, to gather an overall AWT per public transport access point. This identified the high frequency transport corridors.
- 2.7.5 To identify zone of high public transport accessibility, areas were mapped according to the following parameters:
- Locations within an 8-minute walk<sup>5</sup> of bus stops with an AWT under 10 minutes;
  - Locations within a 12-minute walk<sup>6</sup> of rail stations with an AWT under 10 minutes;
- 2.7.6 Based on the above, the 'high frequency public transport zone' boundary was rationalised to make use of natural borders such as roads and canals.

### *Local Centres and Amenities*

- 2.7.7 As discussed in Section 2.6, the current HMO Zone A classifies CMK and local centres but does not include areas that benefit from being within an acceptable

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<sup>3</sup> Based on Transport for London's Public Transport Accessibility Levels (PTAL) methodology

<sup>4</sup> Services based on scheduled timetables (pre-COVID), and excluding subsidised services coming to an end from 31<sup>st</sup> March 2021.

<sup>5</sup> See footnote 3

<sup>6</sup> See footnote 3

walking distance of the services and amenities. The only area of Zone A which accounts for surrounding residential areas is Central Milton Keynes (Campbell Park).

2.7.8 To better capture areas that are within reasonable access to key service and amenity centres, 10-minute walking catchments were calculated from each centre.

2.7.9 The existing HMO Zone A boundaries were used for all outer centres, whilst the Central Milton Keynes boundary was reduced to exclude the surrounding estates prior to conducting this exercise to avoid capturing residential areas that were beyond a 10-minute walk from the CMK amenities.

2.7.10 The walking boundaries were then rationalised to make use of natural borders such as roads and canals.

#### *Zone Development*

2.7.11 Based on the above exercise, draft accessibility zones have been developed to allow HMO parking standards to reflect differing levels of accessibility.

The following hierarchy has been applied to the areas calculated above:

- Zone 1:
  - Central Milton Keynes
- Zone 2:
  - 10-minute walking catchment from Central Milton Keynes
  - 10-minute walking catchment from local centres with high frequency public transport interchanges:
    - Bletchley
    - Fenny Stratford
- Zone 3:
  - 10-minute walking catchment from local centres with high frequency bus routes:
    - Stony Stratford
    - Wovlerton Centres
- Zone 4:
  - High frequency public transport zone
  - 10-minute walking catchment from outlying local centres:
    - Olney
    - Newport Pagnell
    - Westcroft
    - Kingston

- Woburn Sands

2.7.12 The draft zones are shown in Figure 3 overleaf. These are considered to reflect the differing accessibility levels of outer-lying centres, areas with high public transport but low access to amenities, and those areas benefiting from both.

2.7.13 Based on the current distribution of registered HMOs (see Figure 1), the zones would capture the following proportions:

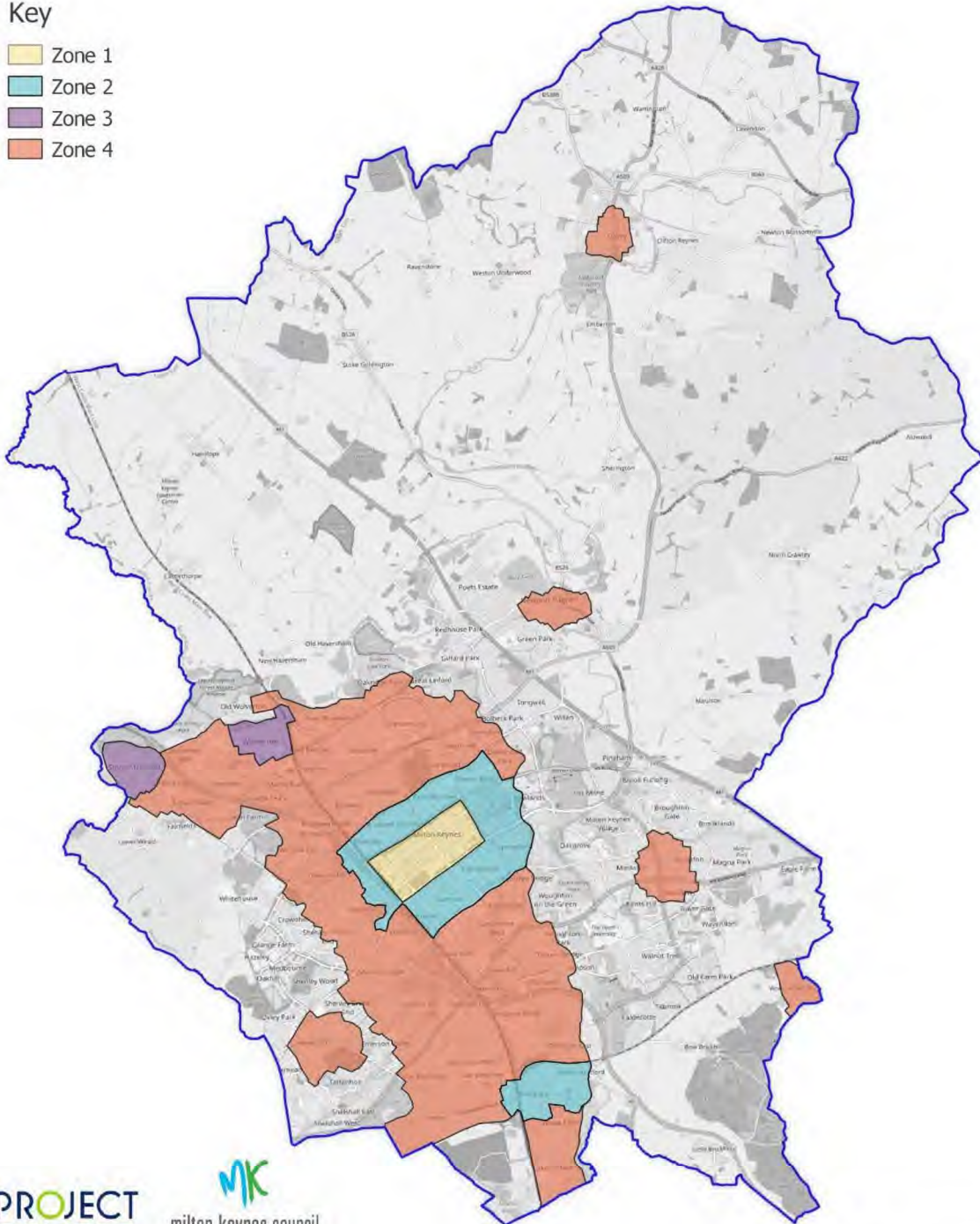
- Zone 1: 9% (38 existing HMOs)
- Zone 2: 58% (242 existing HMOs)
- Zone 3: 1% (5 existing HMOs)
- Zone 4: 22% (91 existing HMOs)
- No zone: 10% (41 existing HMOs)

Figure 3:

### Milton Keynes Draft HMO Accessibility Zones

Key

- Zone 1
- Zone 2
- Zone 3
- Zone 4



**2.8 Recommended Approach**

- 2.8.1 The above exercise has demonstrated that the current parking standards for HMO properties do not allow for flexibility based on accessibility or individual circumstances.
- 2.8.2 Furthermore, the level of on-plot parking required for new HMOs is shown to be difficult to achieve. Off-street parking is often contested and the current standards state reliance on this should usually be refused.
- 2.8.3 Based on feedback from a local letting agent, HMO tenants have limited demand for car parking. This will particularly be the case in more central accessible areas, and the standards should reflect this.
- 2.8.4 Furthermore, Milton Keynes Council declared a Climate Emergency in December 2018. As such, the parking standards for new development should be moving towards a more stringent approach to discourage car ownership.

*Proposed Parking Standards*

- 2.8.5 The recommendation is based on a maximum standard to reflect this. This is considered to enable more flexibility in the planning process.

**Table 5: Suggested HMO Car Parking Standards (maximums)**

Accessibility Zone	Proposed Standard (spaces per lettable room)	Worked Example Lettable Rooms:			
		3	4	5	6
<b>Zone 1</b>	Car free*	0*			
<b>Zone 2</b>	0.33	1	1	2	2
<b>Zone 3</b>	0.50	2	2	3	3
<b>Zone 4</b>	0.66	2	3	3	4
<b>No zone</b>	0.75	2	3	4	5

\* Where lettable rooms are proposed to be designed for disabled access, parking at a 1:1 ratio should be provided per disabled access room.

- 2.8.6 The standards should enable assessment on a case-by-case basis. The following caveats are proposed to allow for this:
  - Where a proposal is to convert an existing C3 dwellinghouse to C4 HMO property, any shortfall in provision from the existing use can be considered when assessing potential on-street impacts of the HMO proposal.

- Where a property proposed for conversion to C4 HMO has existing on-plot parking exceeding the maximum HMO parking standard, it is not considered necessary to remove parking spaces.
- Provision for electric vehicle charging for at least one vehicle should be incorporated where on-plot parking is provided.
- If parking is proposed below the maximum, it should be demonstrated that on-street parking can suitably be accommodated without adversely impacting highways safety or capacity.
- If parking is proposed below the maximum in areas of high on-street parking pressure or limited on-street space, a parking beat survey is required to support the application. This should be conducted in accordance with the Lambeth parking methodology<sup>7</sup>.

#### *Cycle Parking*

- 2.8.7 Although not within the scope of this assessment, it is considered essential that the above parking standards are introduced alongside ambitious cycle parking standards.
- 2.8.8 Milton Keynes benefits from an extensive network of Redways (off-road walking and cycling paths). The reduction in parking standard proposed above should be introduced with higher cycle standards. Currently, HMO properties are required to provide cycle parking as a ratio of 1 space per 2 bedrooms.
- 2.8.9 It is recommended that this is increased to a ratio of 1:1. Furthermore, the standards should ensure cycle parking is provided to a high quality, with facilities that are both secure and covered.

#### *Proposed Accessibility Zones*

- 2.8.10 The draft zoned approach discussed within Sections 2.7 and 2.8 should be developed alongside zones for other land uses; in particular C3 residential. The current Zones A and B for HMO parking standards to not apply for any other land uses.
- 2.8.11 There is an opportunity for a holistic approach to zoning to be taken across all Milton Keynes parking standards, and the proposed HMO zones should be developed further to ensure they are in line with other land use standards.

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<sup>7</sup> [https://www.lambeth.gov.uk/sites/default/files/pl-PARKING\\_SURVEY\\_GUIDANCE\\_NOTE\\_Nov\\_2012\\_Update.pdf](https://www.lambeth.gov.uk/sites/default/files/pl-PARKING_SURVEY_GUIDANCE_NOTE_Nov_2012_Update.pdf)

### 3. BUILT TO RENT

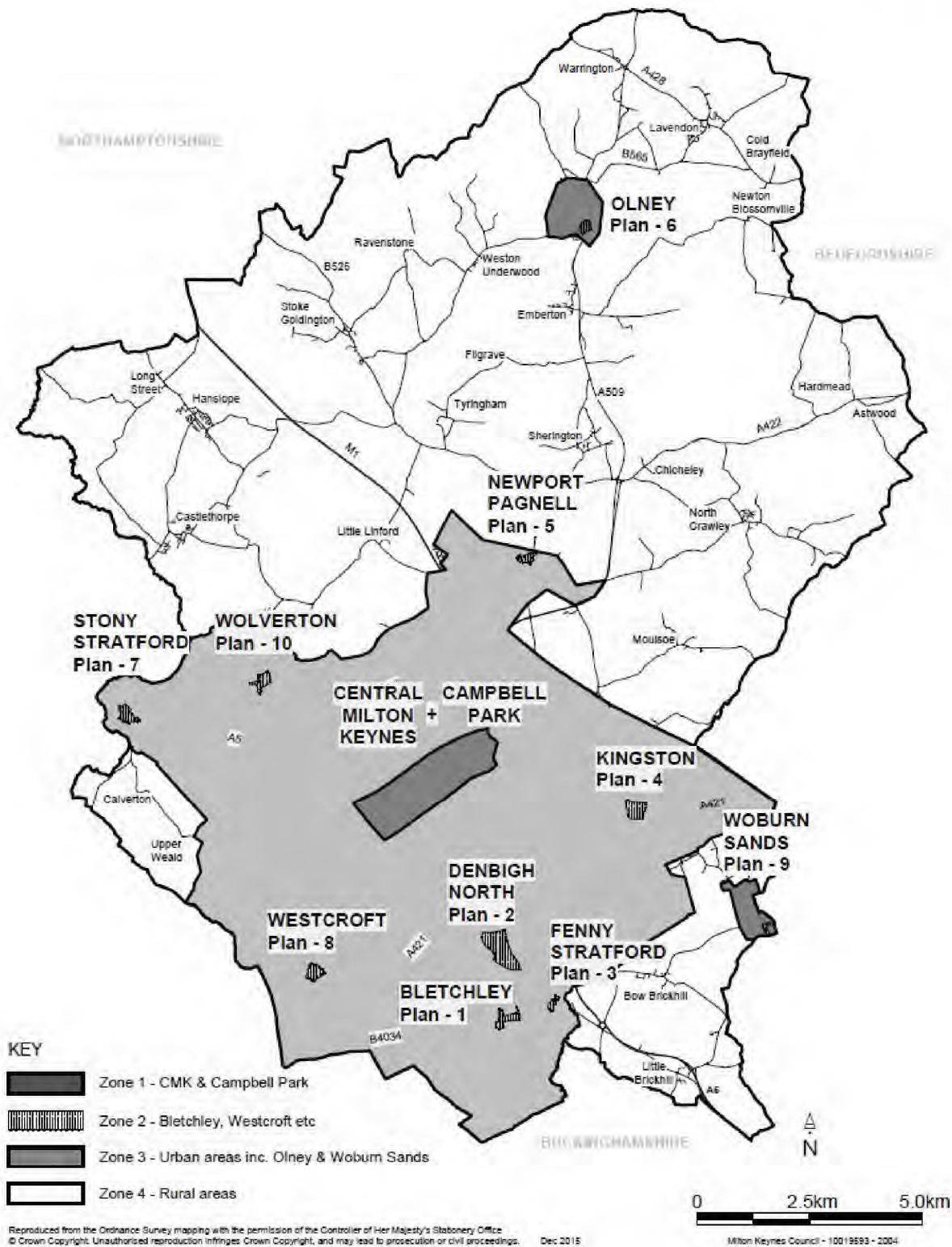
- 3.1.1 Build to Rent (BTR) developments are an emerging sector of homes being built for rent rather than sale. The sector has grown in response to increasing demand for high-quality rental accommodation.
- 3.1.2 The emerging market differs from standard C3 residential both in target demographic and the ancillary facilities offered alongside rental units. Many BTR developments offer on-site property management, security, and communal facilities such as residents' lounges, gyms, and guest rooms for hire. Services may also be integrated, such as high-speed broadband, dry-cleaning and on-site car hire.
- 3.1.3 The following chapter conducts a review of the existing parking requirements applied to new Build to Rent (BTR) developments, and details emerging research into the sector. The review assesses expected parking demand for BTRs and recommends an approach for BTR parking standards.

#### 3.2 Existing Policy

- 3.2.1 The Milton Keynes Council Parking Standards Supplementary Planning Document (SPD) was adopted on 11<sup>th</sup> January 2016. The document sets out the development-related parking standard for Milton Keynes including requirements for cycles, powered two wheelers and guidance for provision of parking for people with disabilities.
- 3.2.2 Milton Keynes Council does not currently have dedicated parking standards for BTR developments. BTR proposals would be subject to the current standards for 'C3 residential dwellings'. The parking requirements are based on a zonal approach as follows:
- Zone 1- Central Milton Keynes and Campbell Park
  - Zone 2- The district centres of Westcroft and Kingston, the MK1/Stadium MK area and the older town centres of Woburn Sands, Fenny Stratford, Bletchley, Stony Stratford, Wolverton, Newport Pagnell and Olney.
  - Zone 3- The remaining areas of the city not identified in Zones 1 and 2, and the rural towns of Newport Pagnell, Olney and Woburn Sands. The rural towns are defined by their settlement boundaries.
  - Zone 4- The rest of the Milton Keynes Council area, which is largely the rural areas.
- 3.2.3 The zones described above are shown in the map extract overleaf.



**Zones 1-4 Map**



3.2.4 The parking requirements for C3 (and therefore BTR) are summarised in Table 6 below for each zone. These show the number of spaces that developments should provide (i.e. not a maximum or minimum).

**Table 6: Residential (C3) Parking Standards**

Use Class	Accessibility Zone			
	Zone 1 <small>Note: for CMK and Campbell Park, the parking standards in the CMK Business Neighbourhood Plan apply (see Appendix C)</small>	Zone 2	Zone 3	Zone 4
<b>C3 - Residential Dwellings (per unit)</b>				
• 1 bedroom dwellings	1	1+0.33 unallocated	1+0.33 unallocated	1+0.33 unallocated
• 2 bedroom flat	1	1+0.33 unallocated	1+0.75 unallocated	1+0.75 unallocated
• 2 bedroom dwellings	1	1+0.33 unallocated	2+0.25 unallocated	2+0.25 unallocated
• 3 bedroom dwellings	2	2+0.33 unallocated	2+0.5 unallocated	2+0.5 unallocated
• 4+ bedroom dwellings	2	2+0.33 unallocated	2+0.5 unallocated	3+0.33 unallocated

Source: Milton Keynes Parking Standards, January 2016

3.2.5 The parking standards SPD states that all dwellings, whether shared ownership or market housing, should have access to at least one allocated, independently accessible, off-street parking space. Garages do not count as parking spaces.

3.2.6 Further to the above, for sites within CMK and Campbell Park, Policy CMKAP T4 applies. The standards in this area are as per Zone 1 in Table 6, except under Policy CMKAP T4 these are classed as maximums.

#### *Parking Layout*

3.2.7 To avoid issues caused by disorganised parking, such cluttered and “untidy” street scenes, obstructions to refuse and emergency vehicles and footways, the parking standards require that the following hierarchy of preference should be adhered to when providing car parking for new residential developments:

- On plot, located at the front or side of the dwelling.
- On-street to the front of dwellings (either on the street itself or as part of a front parking court)

3.2.8 The parking standards SPD provides detailed guidance on acceptable parking arrangements for both on-plot and on-street parking. This guidance predominantly applies to lower density and low-rise housing, which is reflective of the housing style of much of Milton Keynes outside CMK.

#### *Electric Vehicles*

3.2.9 Increasing the parking capacity for Electric Vehicles is a key policy aim of Milton Keynes Council. The Council received a funding grant from the OLEV

Go Ultra Low City Scheme to enable its goals of dramatically increasing the numbers of ultra-low emissions vehicles on the city's roads.

- 3.2.10 The Parking Standards SPD details requirements for non-residential developments to provide charging points at a percentage of the full standard. However, there is no specific requirement for residential developments to provide dedicated charging provision.

*Parking for People with Disabilities*

- 3.2.11 The Parking Standards SPD details requirements for employment and non-residential developments to provide suitable parking for blue badge holders. However, no specific standard is required for residential uses. This likely due to the nature of residential housing stock in Milton Keynes which is typically lower density with curtilage parking.

*Goods Vehicles Parking*

- 3.2.12 Certain uses will be frequently serviced by larger vehicles including Heavy Goods Vehicles (HGVs), and the Parking Standards SPD states that where this is the case, parking / loading / standing areas should be provided.
- 3.2.13 Whilst this is unlikely to be the case for standard residential uses, higher density and central BTR developments are likely to require more frequent and larger vehicle servicing.
- 3.2.14 The SPD states that;

*“Where appropriate, it will be necessary to demonstrate through Transport Statements / Transport Assessments or separate Delivery and Servicing Management Plans how goods vehicles will be managed as part of the proposed development, where these vehicles enter a site they will be expected to enter and leave in forward gear.” (Parking Standards SPD, 2.15)*

- 3.2.15 The above is considered applicable to central and high-density BTR proposals.

### **3.3 Comparator Authorities**

- 3.3.1 As described previously in Section 2.3, the following comparable authorities were specifically reviewed in detail:

- Luton
- Stevenage
- Bedford
- Northampton
- Hemel Hempstead

3.3.2 Table 7 details the results of the review. As the BTR sector is still relatively new, none of the reviewed authorities have dedicated parking standards for BTR developments. A wider search suggested this is the case UK-wide and no examples were found of authorities with dedicated BTR standards. Milton Keynes therefore has an opportunity to set a leading precedent as BTR developments become increasingly common.

**Table 7: Comparator Authority Residential Parking Standards**

Authority	Specific BTR Standard?	Parking Policy
Luton	No	<p>BTRs would likely be subject to C3 residential standards in lieu of dedicated standards. These are <b>maximum</b> standards:</p> <ul style="list-style-type: none"> <li>■ 1 space per 1 bed</li> <li>■ 2 spaces per 2/3 bed</li> <li>■ 3 spaces per 4+ bed</li> </ul> <p>The standards make allowance for lower provision in more accessible areas.</p>
Stevenage	No	<p>BTRs would likely be subject to C3 residential standards in lieu of dedicated standards.</p> <ul style="list-style-type: none"> <li>■ 1 bed: 1 space per house / 1 space per flat</li> <li>■ 2 bed: 1.5 spaces per house / 1.5 spaces per flat</li> <li>■ 3 bed: 2 spaces per house / 1.5 spaces per flat</li> <li>■ 4+ bed: 2.5 spaces per house / 2 spaces per flat</li> </ul> <p>Areas with higher accessibility are subject to reduced maximum standards based on 4 accessibility zones;</p> <ul style="list-style-type: none"> <li>■ Town Centre: 0-25%</li> <li>■ Zone 1: 25-50%</li> <li>■ Zone 2: 50-75%</li> <li>■ Zone 3: 75-100%</li> </ul> <p>Within each range, the higher percentage represents the maximum level of parking provision.</p>
Bedford	No	<p>BTRs would likely be subject to C3 residential standards in lieu of dedicated standards. Bedford Parking Standards SPD defines <b>minimum</b> residential standards:</p> <ul style="list-style-type: none"> <li>■ 1 space per 1 bed</li> <li>■ 2 spaces per 2/3 bed</li> <li>■ 3 spaces per 4+ bed</li> </ul> <p>The provision of Electric Vehicle charging points in communal parking areas and in town centre developments of 2 or more dwellings is welcomed.</p>

Northampton	No	<p>BTRs would likely be subject to C3 residential standards in lieu of dedicated standards.</p> <p>These are <b>minimum</b> standards:</p> <ul style="list-style-type: none"> <li>■ 1 space per 1 bed</li> <li>■ 2 spaces per 2/3 bed</li> <li>■ 3 spaces per 4+ bed</li> <li>■ Plus, visitor spaces of 1 per dwelling across the development.</li> </ul> <p>However, these are defined as standards for “family homes” and are not necessarily appropriate for BTR.</p>
Hemel Hempstead (Dacorum Borough Council)	No*	<p>The C3 standards apply to all housing (including apartments and flats as well as houses) and to any affordable or social housing. This has the advantage that should tenures of a development change over time, there are unlikely to be parking difficulties.</p> <ul style="list-style-type: none"> <li>■ 1 (allocated) / 0.8 (unallocated) space per studio or 1 bed</li> <li>■ 1.3 (allocated) / 1.1 (unallocated) space per 2 bed</li> <li>■ 1.7 (allocated) / 1.4 (unallocated) space per 3 bed</li> <li>■ 1.97 (allocated) / 1.6 (unallocated) space per 4 bed</li> </ul> <p>Areas with higher accessibility are subject to reduced maximum standards based on the following zones</p> <ul style="list-style-type: none"> <li>■ Accessibility Zone 1 – up to 30% reduction permitted</li> <li>■ Accessibility Zone 2 – up to 10% reduction permitted</li> <li>■ Rest of the borough – parking standard unless Council accepts reductions in specific cases</li> </ul>

### 3.4 BTR Research

3.4.1 The BTR sector is still emerging and therefore research and data is still in its infancy. The below sections detail key research done to date regarding tenant demographic and parking demand.

**Unlocking the Benefits and Potential of Build to Rent, British Property Federation, February 2017**

3.4.2 The British Property Federation (BPF) commissioned this report to understand whether the BTR sector benefit from any specific policy measures to help the sector establish during its infancy phase.

3.4.3 The research was conducted by Savills Research and Economics teams, with the London School of Economics providing an independent and critical role for the collection and analysis of data.

3.4.4 The research identifies the benefits of BTR and the potential the sector holds to increase housing supply in England and Wales. It is the first study to quantify the scale of BTR delivery across the country and to identify the nature of schemes in terms of their planning status, scale and delivery approach.

*Stakeholder Consultation*

3.4.5 The research involved a range of stakeholder consultation including interviews and roundtables with those engaged in the delivery of BTR from both the private and public sectors.

3.4.6 The stakeholder engagement identified a number of challenges that impact on the BTR sector<sup>8</sup>. Those that may impact future parking standards are:

- **The need for a definition of what constitutes BTR**

A definition would be helpful for planning, taxation and management purposes and may need to vary depending on its purpose. For example, for planning purposes, a definition would be helpful if it was used in negotiations concerning the provision of affordable housing and covenants lengths.

- **Scale**

This is important to the definition of BTR because of the proportionate risk associated with large schemes and also in terms of the level of affordable housing provision. Stakeholders discussed whether the definition of BTR should relate to scale. Various stakeholders were keen to set a minimum size for schemes to qualify as BTR for planning and tax purposes e.g. *A scheme should have at least 50 units to qualify as BTR*. Others stated management structure over scale should be used to define BTR e.g., *BTR is professionally managed stock in single ownership*.

- **Covenant Restrictions**

Covenant restrictions are an important tool. They give certainty to local authorities that the intention is not to break-up and sell the scheme unit by unit within a specific timeframe. Where public sector land is concerned, if the land is brought to the market for sale with a potential covenant attached, it reduces the competition from the build-for-sale market.

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<sup>8</sup> Unlocking the Benefits and Potential of Build to Rent, BPF, Feb 2017: Section 3.1

This will help ensure parking provision is appropriate for the tenure and will not lead to issues due to future tenure changes.

- **The need for more flexibility in planning regulation**

With respect to car parking, design and space standards. This was considered one of the most important and effective way to get more units delivered.

*Definition of Build to Rent*

3.4.7 The BTR sector does not have a widely accepted definition for planning and policy purposes. This was a key finding of the stakeholder workshops as described above and is considered key in providing certainty for planning negotiations amongst other issues.

3.4.8 As discussed above, the stakeholder consultation returned varying options on parameters for defining BTR schemes;

- Scale of development (eg. minimum sizing)
- Management and operational structure, not physical attributes such as size, scale or property types (houses versus apartments)

3.4.9 The BPF identifies a working definition for BTR as;

*'New residential supply for market rent in clusters with a single owner using professional management.'*

The table below provides a breakdown and further definitions of the above for the purposes of planning policy:

**Table 8: BTR Definition**

Terms	Definition
New	Newly developed housing. This may include units converted from other uses, such as office to residential conversions undertaken through permitted development rights (PDR)
Cluster	Each scheme can be on one or more sites, but each site should have at least 50 BTR units in the same block or located close together.
Residential supply for market rent	Property that will remain available for rent to tenants for a defined period. Each lease will be for an agreed fixed term (while some definitions insist on longer term leases this is not necessarily appropriate for all types of BTR tenants).
Single Owner	One legal entity owning the relevant development/cluster of sites.
Professional Management	Management of the units using an integrated or semi-integrated approach which delivers a high standard of management and service including a comprehensive maintenance programme.

Source: *Unlocking the Benefits and Potential of Build to Rent, BPF, Feb 2017: Table 9*

3.4.10 It should be noted that, following the publication of this BPF paper, the NPPF February 2019 update included a definition of BTR as:

*“Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.”<sup>9</sup>*

*Planning and Regulations in Relation to Parking*

3.4.11 The BPF reported that stakeholders claim local authorities often require the same car parking provision as build to sell schemes which leads to excessive car parking provision that is unsuitable to the characteristics of BTR occupiers.

3.4.12 This is particularly relevant in urban and town centre locations where renters would need to rent these car parking spaces but there is little demand from tenants to rent them along with their rental unit.

3.4.13 Furthermore, stakeholders noted that local opposition to BTR schemes often centre on perceived parking issues. This indicates there is a lack of knowledge amongst the general public for how the characteristics of BTR occupiers differ from traditional build for sale purchasers. This was noted to have potentially led to unnecessarily high parking requirements being for BTR schemes.

3.4.14 One stakeholder noted:

*“We buy property near public transport hubs and target young professionals. However, locals will still complain that there will be too many cars because of the scheme”<sup>10</sup>*

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<sup>9</sup> National Planning Policy Framework (NPPF), February 2019: page 65

<sup>10</sup> Unlocking the Benefits and Potential of Build to Rent, BPF, Feb 2017: Section 3.6

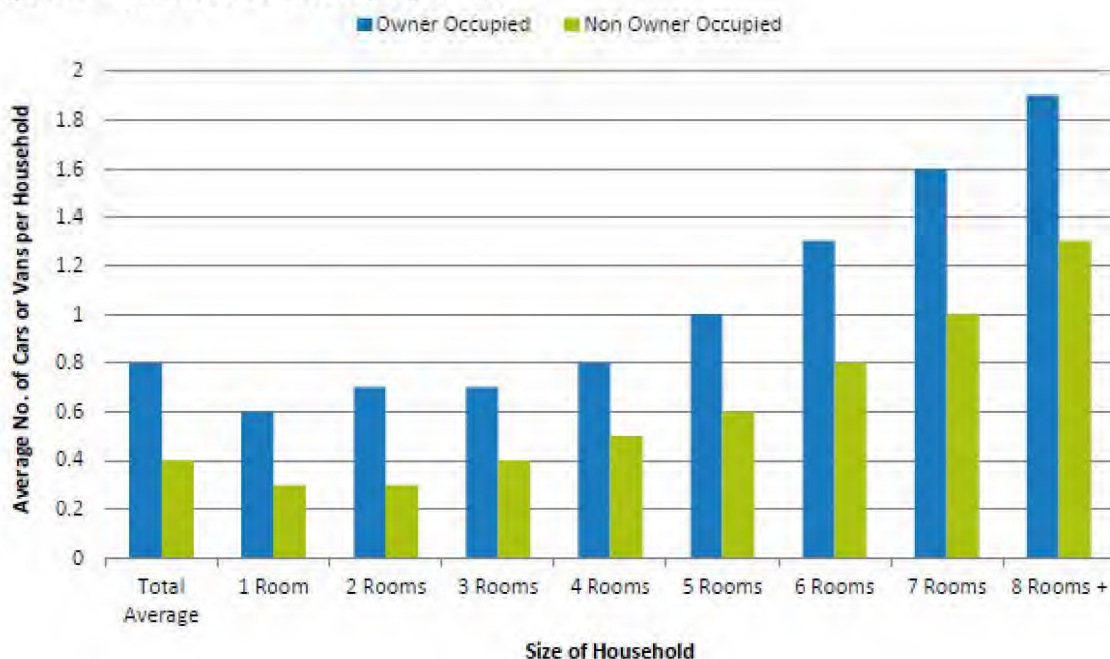


*Excessive Car Parking Requirements*

3.4.15 The BPF references Department of Communities and Local Government research<sup>11</sup> which states that households occupying rented accommodation can have up to 0.5 fewer cars than owner-occupied households in dwellings of similar size and type.

3.4.16 Census 2011 data is also presented, which shows how across all household sizes, owner occupied properties have higher numbers of cars per household than non-owner-occupied households. This is shown in the extract below.

**Figure 4: Private Car Ownership by Tenure**



Source: Census 11, via *Unlocking the Benefits and Potential of Build to Rent*, BPF, Feb 2017: Figure 13

3.4.17 The BPF details the potential consequences of applying onerous car parking including;

- Unnecessary space being set aside for car parking that could be used for housing or more beneficial amenities for tenants;
- Unwanted car parking spaces that tenants do not rent and result in loss of income from valuable development space;

<sup>11</sup> <https://resources.leicestershire.gov.uk/sites/resource/files/field/pdf/faq/2019/2/15/Part-7-appendix-m-residential-car-parking-research.pdf>

- Development densities in terms of units per hectare are lower and consequently reduce the potential of the BTR sector to increase the supply of housing; and
- BTR schemes have additional costs and reduced potential revenues which reduced scheme viability and likelihood of delivery.

*Changes required to the Planning System in Relation to Parking*

3.4.18 Policy requirements for local authorities must be strengthened to provide an adequate evidence basis for minimum car parking standards imposed on residential developments, which explicitly assesses need based on: the unit mix and tenure of schemes, alongside the site's accessibility to public transport infrastructure and local amenities. This will ensure that a suitable quantity of parking places a present for BTR tenants.

**The Build to Rent Hub**

3.4.19 The Build to Rent Hub<sup>12</sup> is an information sharing website on the Build to Rent sector. It aims to bring together all relevant information on this emerging sector.

3.4.20 There is a Property Industry Alliance Initiative, developed in partnership by the BPF, UK Apartment Association (UKAA), and Commercial Real Estate Finance Council Europe (CREFC).

3.4.21 BPF and UKAA, together with London First, published a report titled "Who Lives in Build to Rent?"<sup>13</sup>. This report examined the demographics of tenants in 10 BTR schemes across London.

3.4.22 It is acknowledged that London does differ in many ways to Milton Keynes; however in lieu of more detailed research at this stage, the findings below give a good general indication of BTR resident demographics.

*Tenant Age*

3.4.23 Across the 10 developments, the research found that residents between the ages of 25-34 represented a majority of tenants. In total, 79% of residents were 34 or younger, with just 6% over 45.

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<sup>12</sup> <https://buildtorent.info/>

<sup>13</sup> <https://buildtorent.files.wordpress.com/2021/02/who-lives-in-build-to-rent-report.pdf>

#### *Household Composition*

- 3.4.24 In the BTR sample sites, sharers were found to be the highest proportion of renters (38%), with couples coming second (33%). Single households constitute 17% of renters whilst families are least common, comprising 12%.
- 3.4.25 The research noted that as BTR continues to mature, it is likely that this model of development will evolve and provide bespoke housing options for a variety of different types of household.

#### *Household Income*

- 3.4.26 The research found that within the BTR sample of 10 sites, the most common income bracket was £32,000-47,999, with 29% of residents within this bracket compared to 24% in the wider private rented sector (PRS).
- 3.4.27 The second most common income bracket (£26,000-31,999) constituted 17% in BTR compared to 16% in the wider PRS.
- 3.4.28 The research found that, whilst there are differences between resident income in BTR versus PRS, there is also the broad similarity that the different sectors attract residents from a variety of incomes.

#### *Employment*

- 3.4.29 The research found that 94% of those living within the sample sites were in employment, whilst only a small number (6%) do not work, for example students, unemployed, retired or a stay at home parents.
- 3.4.30 Of those employed, it was found the significant majority (90.5%) worked in the private sector compared to just 9.5% public sector workers.

#### *Research Conclusions*

- 3.4.31 Although centred on London sites, the above research indicates that BTR residents come from a variety of age groups and income streams; however, there are some key trends;
- The majority of residents are under 34;
  - The significant majority of residents are employed in the private sector;
  - The majority of residents are house sharers or living as a couple, with limited demand from families.

### 3.5 BTR Consultation

3.5.1 A consultation exercise was conducted with BTR providers. Three BTR schemes were identified in Milton Keynes:

- **Solstice Apartments**
  - Complete and open
  - Planning Ref: 16/03038/FUL
  - Managed by Grainger Plc.
  - 139 residential apartments
- **YMCA site**
  - Complete and open
  - Planning Ref: 16/01769/FUL
  - 196 supported accommodation units for young people aged 18-35
    - Managed by YMCA
  - 261 residential apartments for private rent
    - Managed by Mayforth
- **Aubrey Place**
  - Under construction, targeted completion April 2022
  - Planning Ref: 18/02822/OUT
  - Managed by Packaged Living
  - 294 residential apartments

3.5.2 A further seven agencies and professional landlords that operate UK-wide were approached with a questionnaire regarding parking for BTR schemes. The full questionnaire and consultation email is included in Appendix A.

3.5.3 Table 9 summarises the approach taken and response to the consultation exercise.

**Table 9: Consultation Attempts and Response**

Company	Areas Covered	Consultation Attempts			Outcome
		1 <sup>st</sup> contact	2 <sup>nd</sup> contact	3 <sup>rd</sup> contact	
Packaged Living	Milton Keynes and UK-wide	12 <sup>th</sup> January 2021: Questionnaire sent	25 <sup>th</sup> January 2021: Reminder email	N/A	Questionnaire response received
YMCA	Milton Keynes and UK-wide			Phone conversation on 9 <sup>th</sup> February	
Mayforth	Milton Keynes and UK-wide			No response	
Grainger Plc.	Milton Keynes and UK-wide			No response	
Cap Real Estate	Specialist BTR consultancy (London)			9 <sup>th</sup> February 2021: Phone calls or voicemails left to draw attention to consultation	No response
Acorn	London Region			No response	
Foxtons	London Region			No response	
Savills	London Region			2 <sup>nd</sup> February 2021: Reminder email	No response
Allsop	UK-wide			No response	

3.5.4 As shown above, the consultation received limited engagement. Savills and Allsop initially indicated they planned to engage however unfortunately no responses were received within the timescales of this report.

3.5.5 Packaged Living, the management company of Aubrey Place in CMK (currently under construction), provided a questionnaire response. Some engagement was also received over the phone with a contact at YMCA.

3.5.6 The key points of the YMCA discussion were:

- Limited car parking demand amongst residents.
- Majority of residents are vulnerable people and unlikely to own a car.

- The independent living properties on-site generate the majority of parking demand.
- Residents are able to get on-street permits if needed.
- Central location, close to public transport limits need for parking.
- EV parking is free within surrounding CPZ, but there is no on-site provision. Some staff who own EVs choose to park on-street due to this.
- Cycle parking is well used by residents and staff.
- Security issues for cycle parking. The access code is often passed to others. Residents request to bring their bikes to their flats due to security concerns.
- Limited demand for motorcycle / moped parking. However due to lack of provision limited number of motorcycles are parked on pavement.
- Significant uptake in use of electric scooters, but no formal place to store these. Residents keep them in their units.

3.5.7 The key points from the Packaged Living response are summarised below. The full questionnaire response is included in Appendix B.

- The demographic of BTR tenants are less reliant on car ownership.
- Their BTR sites are located in highly accessible city centre locations with excellent public transport links, therefore the need for a tenant to own a car is usually low.
- Depending on the location, their developments usually provide between 0-30% which aligns with tenant demand.
- Car parking is “not at all important” for tenants of BTRs.
- Access to public transport is “important” for tenants of BTRs.
- Car club schemes are often provided on-site.
- It is difficult to meet the current parking standard for BTRs. This is because current standards don’t align with demand for parking spaces within BTR schemes.
- Car free developments should be promoted alongside sustainable transport measures such as car club schemes, cycle spaces and improvements to public transport.
- Cycle provision usually provided in line with local policy. This usually results in an over provision of cycle spaces within developments. In the same way parking standards are lower in BTR and residents are offered the use of car club schemes, a similar approach could be taken with cycle spaces.

- Currently developing a 294 apartment BTR scheme on Avebury Boulevard and would be happy to liaise with you pre/post completion if that would help with your current research.

### **3.6 Planning Applications**

- 3.6.1 To understand how the current parking standards function in the planning system, six BTR schemes within Milton Keynes have been reviewed which are either recently approved or under construction.

Table 10: BTR Planning Application Review

Application Reference	Site Address	Development Proposal			Parking Standard		Highways Comments	
		BTR Units	Parking	Ratio	Car club vehicles	Policy		Spaces
16/03038/FUL	Solstice Apartments	142	122	0.86	0	CMKAP T4	141	<p>No objections to parking proposals considering surrounding on-street parking availability, and Census car ownership levels.</p> <ul style="list-style-type: none"> <li>Highways initially objected. Due to low parking provision compared to max. standard.</li> <li>The applicant put forward mitigating circumstances and explained the residential offer that this application provides.</li> <li>The following mitigations were offered: <ul style="list-style-type: none"> <li>Establishment of a Car Club with free membership for tenants</li> <li>Applicant is in discussion with 'My Bus' who are interested in connecting the development to their current service</li> <li>A financial contribution of £84,500 to provide 35 surface car park spaces (based on £2,500/space)</li> </ul> </li> <li>Based on the above Highways raised no further objections.</li> </ul>
18/02822/OUT	Aubrey Place	294	83	0.28	1	CMKAP T4	303	<ul style="list-style-type: none"> <li>No objections, as Highways acknowledges the parking standards are maximums.</li> <li>The proposed 205 spaces are therefore compliant.</li> <li>The TS has considered the use of the site and that part of it is for YMCA units where car use is limited.</li> <li>The TS also stresses the favourable sustainability of the site for alternative transport uses to private car.</li> <li>Those residents that own a car but can't be guaranteed a car parking space will be able to buy parking permits or use 'RingGo' to cover daily use of the publicly available car parking.</li> </ul>
16/01769/FUL	YMCA	196 (supported living)	27	0.14	0	CMKAP T4	-	<ul style="list-style-type: none"> <li>Highways raised an initial objection due to low parking provision being a departure from the approach taken with other residential developments in CMK.</li> <li>Applicant noted standards are maximums and provided parking surveys of CMK to justify the availability of on-street parking.</li> <li>No further Highways objection based on parking, subject to s106 contributions of £137,500 towards parking.</li> <li>This is a hybrid application; part Full and part Outline.</li> <li>The Full application has provided parking to meet maximum CMKAP T4 policy.</li> <li>The intention is then to provide parking for the Outline application below standards.</li> <li>Highways note that there is no guarantee that the reduced parking provision for the reserved matters will be acceptable, however raised no objection based on parking due to the Full application meeting policy.</li> </ul>
18/01591/FUL	Site D4.4 North, Avebury Boulevard / Secklow Gate	328	100	0.30	0	CMKAP T4	328	<ul style="list-style-type: none"> <li>The conclusion for parking provision is that the scheme will provide 132 spaces against a surveyed (Census and other data) demand for between 123 and 169 spaces.</li> <li>Therefore, arguably, the development is providing somewhere between a 9-space overprovision and a 37-space shortfall.</li> <li>Highways raise no objections based on the above.</li> </ul>
19/02804/OUT	Land Bounded By Midsummer Boulevard, Secklow Gate, Lower Twelfth Street And Avebury Boulevard	250	250	1.00	5	CMKAP T4	250	<ul style="list-style-type: none"> <li>Highways raised an initial objection due to low parking provision being a departure from the approach taken with other residential developments in CMK.</li> <li>Applicant noted standards are maximums and provided parking surveys of CMK to justify the availability of on-street parking.</li> <li>No further Highways objection based on parking, subject to s106 contributions of £137,500 towards parking.</li> <li>This is a hybrid application; part Full and part Outline.</li> <li>The Full application has provided parking to meet maximum CMKAP T4 policy.</li> <li>The intention is then to provide parking for the Outline application below standards.</li> <li>Highways note that there is no guarantee that the reduced parking provision for the reserved matters will be acceptable, however raised no objection based on parking due to the Full application meeting policy.</li> </ul>
20/00185/FUL	228 Silbury Boulevard	306	131	0.43	1	CMKAP T4	314	<ul style="list-style-type: none"> <li>Highways raised an initial objection due to low parking provision being a departure from the approach taken with other residential developments in CMK.</li> <li>Applicant noted standards are maximums and provided parking surveys of CMK to justify the availability of on-street parking.</li> <li>No further Highways objection based on parking, subject to s106 contributions of £137,500 towards parking.</li> <li>This is a hybrid application; part Full and part Outline.</li> <li>The Full application has provided parking to meet maximum CMKAP T4 policy.</li> <li>The intention is then to provide parking for the Outline application below standards.</li> <li>Highways note that there is no guarantee that the reduced parking provision for the reserved matters will be acceptable, however raised no objection based on parking due to the Full application meeting policy.</li> </ul>



- 3.6.2 The above review shows the majority of BTR developments have provided parking below the maximum standards for CMK. Applications 18/01591/FUL and 20/00185/FUL both referred to the BPF research discussed previously in Section 3.4, and this was a material consideration at planning committee for 18/01591/FUL.
- 3.6.3 It is notable that no BTR proposals are located outside of CMK. This is in-keeping with the nature of these schemes, with developers targeting central locations with high public transport accessibility to appeal to their key demographic of young professionals.
- 3.6.4 It is possible however, that as the BTR market matures, further BTR markets will evolve to provide housing for a variety of locations and households.

### 3.7 Milton Keynes Car Ownership

- 3.7.1 To build upon the conclusions presented by the BPF in Figure 4, Census car ownership data has been obtained for Milton Keynes. This is presented in Table 11 below.

**Table 11: Milton Keynes Car Ownership by Tenure**

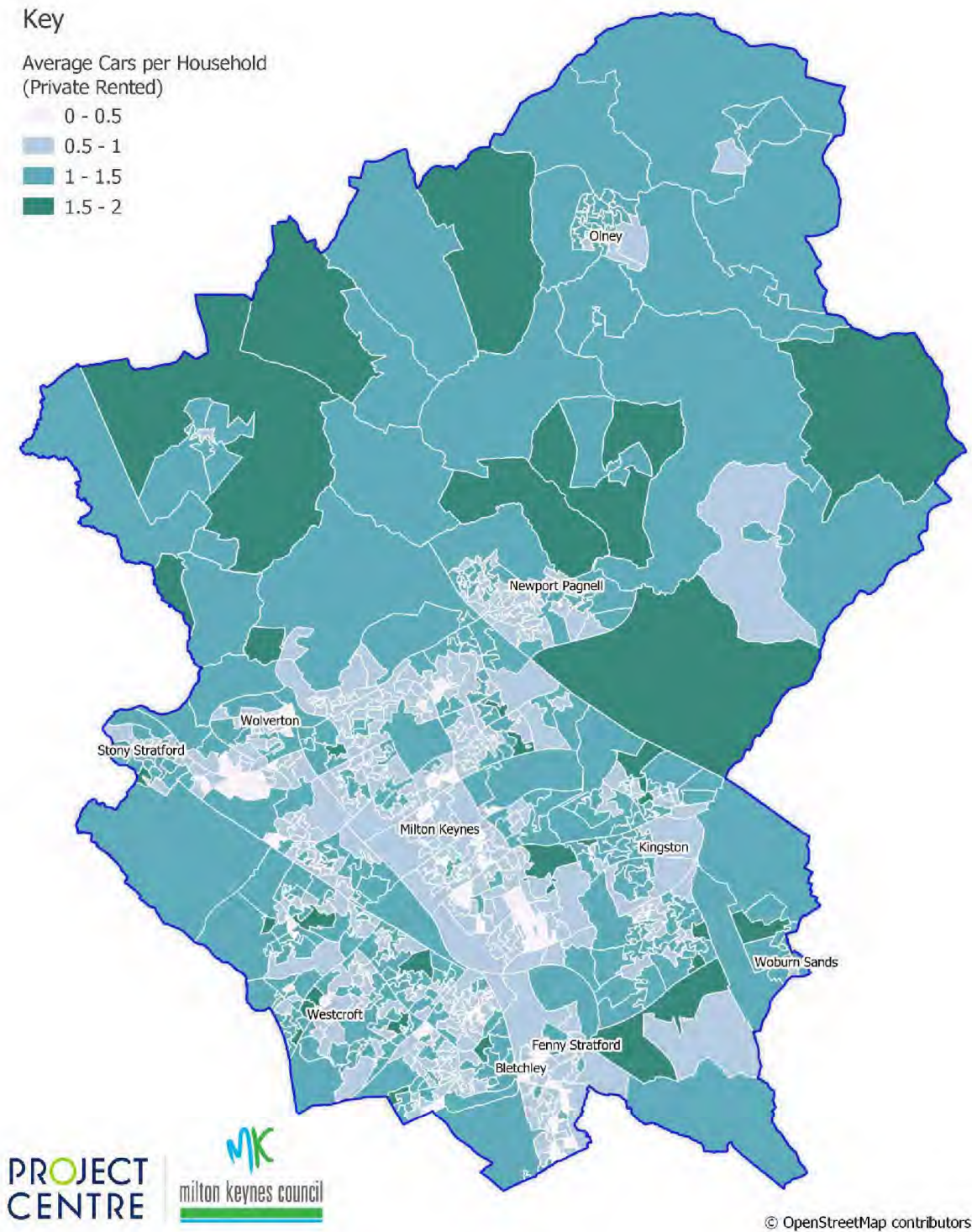
Usual Residents (aged 18+)	Average Cars or Vans per Household	
	Owned	Private Rented
1	0.83	0.65
2 +	1.61	1.12
<b>All households</b>	<b>1.41</b>	<b>0.95</b>

Source: Census 2011: LC4416EW

- 3.7.2 As shown above, car ownership amongst private rented households is c. 33% lower than owner-occupied. Figure 5 overleaf plots Private Rent car ownership data across Milton Keynes. The plan demonstrates that car ownership is generally below 1 car per household across much of the urban area and local centres.
- 3.7.3 It should be noted that this Census data is now 10 years old and therefore car ownership ratios may have changed in the interim. However, the data provide a good basis for identifying general patterns. Following publication of the 2021 Census (expected March 2023), the above data can be re-examined.

Figure 5:

## Average Car Ownership Private Rented Tenures



### 3.8 Recommended Approach

- 3.8.1 The above exercise has concluded that standard residential parking requirements do not account for the specific needs of BTR schemes. BTR developments are predominantly located within central areas of high accessibility.
- 3.8.2 As discussed within Section 3.4, the majority of residents of BTR schemes are young professionals, either flat sharing or living as a couple. At this stage of the BTR industry, there is limited demand for family housing; although this may change as the sector grows.
- 3.8.3 Based on feedback received from a BTR operator in Milton Keynes, parking demand amongst their properties is minimal due to demographic and location. A review of recent planning applications in CMK also revealed an ongoing pattern of lower parking provision being adopted.
- 3.8.4 Based on the review in this Chapter, the following recommendations are made.

#### *Defining Build to Rent*

- 3.8.5 Key to setting parking standards for this new industry is providing a clear definition of when these standards apply. It is proposed that the BPF definition is appropriate for defining applicable schemes, both in scale and management structure:

*'New residential supply for market rent in clusters<sup>14</sup> with a single owner using professional management.'*

- 3.8.6 A full breakdown of the above definition was included in Table 8 previously.
- 3.8.7 This definition will enable parking standards to distinguish from individual small-scale BTR properties. Smaller scale BTR schemes without a central management structure are unlikely to benefit to the same extent from the on-site facilities that encourage lower car ownership.

---

<sup>14</sup> Each scheme can be on one or more sites, but each site should have at least 50 BTR units in the same block or located close together.

### *Proposed Parking Zones*

- 3.8.8 Currently, all committed BTR schemes are located in CMK. It is likely that future schemes will continue to be located in central locations, considering the key characteristics of BTR schemes both in facilities and target demographic.
- 3.8.9 It is proposed that ambitious maximum standards are applied within CMK. As parking within CMK is controlled, there is the ability to enforce more stringent parking standards as the potential for parking overspill is reduced. This approach will support the aims of the Climate Emergency declared by Milton Keynes Council in December 2018 by encouraging high sustainable mode shares in locations where car ownership is not necessary.
- 3.8.10 Although there are no examples of such schemes now, as the BTR sector develops, there is potential for it to expand beyond central locations and target demographics requiring higher car ownership such as family housing.
- 3.8.11 To future-proof the parking standards, a zoned approach is considered appropriate, based on the 4-zone approach discussed in Sections 2.7 and 2.8 previously (see Figure 3). As noted previously, these zones should be developed alongside zones for other land uses to ensure a holistic approach to zoning to be taken across all Milton Keynes parking standards.
- 3.8.12 Although future schemes in less accessible areas should have more relaxed standards, it is considered they should remain ambitious as the BTR principles of central professional management and on-site facilities would still apply. It is likely therefore that any less central BTR schemes would still benefit from facilities and initiatives that can encourage lower car ownership.

### Proposed Parking Standards

3.8.13 The recommendation is based on a maximum standard to reflect the above findings.

**Table 12: Suggested BTR Car Parking Standards (maximums)**

Accessibility Zone	Proposed Standard (spaces per unit)				Unallocated Parking (visitor & staff)
	1 bed	2 bed	3 bed	4+ bed	
Zone 1	0.33	0.5	0.75	1	0
Zone 2	0.33	0.5	0.75	1	0.25
Zone 3	0.5	0.75	1	1.5	0.25
Zone 4	0.75	1	1.5	2	0.25
No zone	1	1	2	2	0.25

3.8.14 The standards should enable assessment on a case-by-case basis. The following caveats are proposed to allow for this:

- Where units are designed to disabled access standards, parking at a 1:1 ratio should be provided per disabled access unit.
- Dedicated loading and servicing facilities should be provided on-site.
- Allocated staff parking may be required where high numbers of on-site staff are proposed. This will be assessed on an individual basis.
- All BTR proposals should incorporate a Travel Plan including robust measures to encourage low car ownership.
- Car-free schemes will be considered within Zone 1, or future areas where on-street parking controls are in place.
- Future residents of car-free schemes would not be eligible for on-street parking permits.
- If parking is proposed below the maximum in locations where surrounding on-street parking is uncontrolled, parking beat surveys will be required in accordance with the Lambeth parking methodology<sup>15</sup>.

<sup>15</sup> [https://www.lambeth.gov.uk/sites/default/files/pl\\_PARKING\\_SURVEY\\_GUIDANCE\\_NOTE\\_Nov\\_2012\\_Update.pdf](https://www.lambeth.gov.uk/sites/default/files/pl_PARKING_SURVEY_GUIDANCE_NOTE_Nov_2012_Update.pdf)

- Car Club provision:
  - Any scheme providing parking below the maximum standards must provide or contribute towards pool cars or Car Club vehicles. These should be provided at a rate of 1 Car Club/pool car space per 6.1 spaces<sup>16</sup> below the maximum parking requirement.

**Worked example:**

*A scheme provides 100 BTR units within Zone 1, comprising:*

- *20no 1 beds*
- *20no 2 beds*
- *20no 3 beds*
- *20no 4 beds*

*The maximum parking provision is 52 spaces (based on Table 12).*

*The scheme provides 33 spaces = 18 spaces below the maximum standard.*

*The scheme should provide or contribute towards 1 Car Club space per 6.1 spaces below the maximum:*

*18 spaces below maximum / 6.1 = 3 Car Club spaces*

- Publicly accessible Car Club vehicles are preferred where viable. These should be located in a prominent visible location.
- In areas with a high concentration of Car Club vehicles are already in the vicinity, this will be assessed on a case-by-case basis.

#### *Electric Vehicle Charging*

3.8.15 The parking standards SPD details requirements for non-residential developments to provide charging points. However, there is no specific requirements for residential developments to provide dedicated charging provision.

3.8.16 It is recommended that EV charging is required for BTR schemes where on-site parking is proposed. A ratio of 20% active and 20% passive provision is considered reasonable.

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<sup>16</sup> Each Car Club vehicle removes 6.1 private cars from the road (based on a survey of 2,500 car club members by Cosmo in 2017/18).

### *Cycle Parking*

- 3.8.17 Although not within the scope of this assessment, it is considered essential that the above parking standards are introduced alongside ambitious cycle parking standards.
- 3.8.18 Milton Keynes benefits from an extensive network of Redways (off-road walking and cycling paths). The reduction in parking standard proposed above should be introduced alongside stringent cycle standards.
- 3.8.19 Currently, BTR schemes are subject to standard C3 requirements of:
- 1 space per 1 or 2 bed unit
  - 2 spaces per 3+ bed unit
- 3.8.20 It is recommended that this is increased to:
- 1 space per studio or 1 bed unit
  - 1.5 spaces per 2 bed unit
  - 2 spaces per 3+ bed unit
- 3.8.21 The above is considered achievable yet ambitious, as it is in line with standards contained in the New London Plan (2021). The increased requirement for 2-bed units accounts for the high proportion of BTR tenants found to be living as couples or flat shares, and lower proportion of single occupants (see Section 3.4).
- 3.8.22 Furthermore, as BTR sites include central on-site management and facilities, dedicated long-stay cycle parking must be provided for staff. The standards should also ensure cycle parking is provided to a high quality, with long-stay facilities that are both secure and covered.

### *Future Changes*

- 3.8.23 As discussed previously, the BTR sector is in its infancy and currently targets highly accessible central locations. As the sector grows, locations and tenant demographics may evolve. As such, it is recommended that the proposed approach to parking standards is maintained under review as further BTR research becomes available.
- 3.8.24 Additionally, the publication of Census 2021 data (expected March 2023) will provide further up-to-date car ownership data for Private Rented units. This should be interrogated when available and compared against the proposed standards.

## 4. SUMMARY AND CONCLUSIONS

- 4.1.1 Project Centre Ltd. (PCL) has undertaken a review of parking standards requirements for Houses of Multiple Occupation (HMO) and Build to Rent (BTR) proposals.
- 4.1.2 The report has gathered and presented evidence of parking demand for each land use and reviewed the evidence in relation to current parking standards for Milton Keynes.

### *HMO Findings*

- 4.1.3 The review of HMO requirements found that the current parking standards do not allow for flexibility based on accessibility or individual circumstances. This has led to several planning refusals on parking grounds which were subsequently overturned at appeal.
- 4.1.4 Furthermore, the level of on-plot parking required for new HMOs is shown to be difficult to achieve. Off-street parking is often contested and the current standards state reliance on this should usually be refused.
- 4.1.5 Based on feedback from a local letting agent, HMO tenants have limited demand for car parking. This will particularly be the case in more central accessible areas.
- 4.1.6 The report proposes four “accessibility zones” for HMOs which aim to provide standards that account for sites where there is less reliance on private cars. The draft zones have been developed based on public transport frequency and access to facilities, and therefore it is suggested that these can be flexibly applied across parking standards for other land uses.
- 4.1.7 The proposed standards for HMOs are “maximums”, which is intended to enable more flexibility and also account for lower parking demand amongst HMO tenants. Furthermore, the current requirements for on-plot parking are found to be difficult to achieve. The recommended approach therefore allows for some reliance on on-street parking, to be assessed on an individual basis and supported by on-street surveys where necessary.

### *BTR Findings*

- 4.1.8 BTR developments are an emerging sector of homes being built for rent rather than sale. The emerging market differs from standard C3 residential both in target demographic and the ancillary facilities offered alongside rental units. Many BTR developments offer on-site property management, security, and communal facilities such as residents’ lounges, gyms, and guest rooms for



hire. Services may also be integrated, such as high-speed broadband, dry-cleaning and on-site car hire.

- 4.1.9 The sector is relatively new and as such there is limited data available; however, a review of research found that standard C3 residential parking requirements do not account for the specific needs of BTR schemes.
- 4.1.10 Based on feedback received from a BTR operator in Milton Keynes, parking demand amongst their properties is minimal due to demographic and location. A review of recent planning applications in CMK also revealed an ongoing pattern of lower parking provision being adopted.
- 4.1.11 At this stage of the BTR industry, there is limited demand for family housing or sites in less central locations; although this may change as the sector grows.
- 4.1.12 The review also found that key to setting parking standards for this new industry is providing a clear definition of when these standards apply. It is proposed that the British Property Foundation definition is appropriate for defining applicable schemes, both in scale and management structure:
- 'New residential supply for market rent in clusters<sup>17</sup> with a single owner using professional management.'*
- 4.1.13 This definition enables parking standards to distinguish from individual small-scale BTR properties. Smaller scale BTR schemes without a central management structure are unlikely to benefit to the same extent from the on-site facilities that encourage lower car ownership.
- 4.1.14 The proposed standards for BTRs are "maximums" and are proposed on a 4-zone approach as with the HMO standards. These zones are draft, and it is recommended to develop these in line with the wider standards review to develop a holistic zoning system.
- 4.1.15 The majority of BTR schemes are likely to be within CMK initially, and as such the central parking standards are stringent to manage down parking demand. The proposed standards for the wider zones are intended to future-proof the BTR standards as the sector develops whilst remaining ambitious and capitalising on the on-site facilities that BTR schemes can provide.

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<sup>17</sup> Each scheme can be on one or more sites, but each site should have at least 50 BTR units in the same block or located close together.

Appendix A  
Sent Email and Questionnaires

## Houses in Multiple Occupation

**Caitlin King**

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**Subject:** Milton Keynes Council - Have your say on Parking Standards for new HMOs  
**Attachments:** HMO Parking Requirements Questionnaire.pdf

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Hello,

**On Behalf of Milton Keynes Council –  
Have your say on Parking Standards for new HMOs**

We (Project Centre Ltd) have been passed on your details by Milton Keynes Council (MKC), as we would value your feedback to this consultation.

As you may know, planning applications for new HMOs are subject to a set of parking standards contained in MKC's [Parking Standards Supplementary Planning Document \(SPD\)](#), adopted in January 2016.

We are currently reviewing the suitability of these standards to suit the needs of HMOs.

We would greatly value your input based on your experience of managing HMO properties in Milton Keynes.

I have attached a form containing some information on the current parking standards, and 7 questions which I would be very grateful if you would answer and return to me.

If you have any queries on this, please do not hesitate to contact me on my details below.

Caitlin King  
Senior Transport Planner  
Project Centre  
[REDACTED]

[www.projectcentre.co.uk](http://www.projectcentre.co.uk)

## Introduction:

We (Project Centre Ltd) have been commissioned by Milton Keynes Council (MKC) to undertake a review of parking requirements and standards for 'Houses of Multiple Occupation' (HMO's) within Milton Keynes.

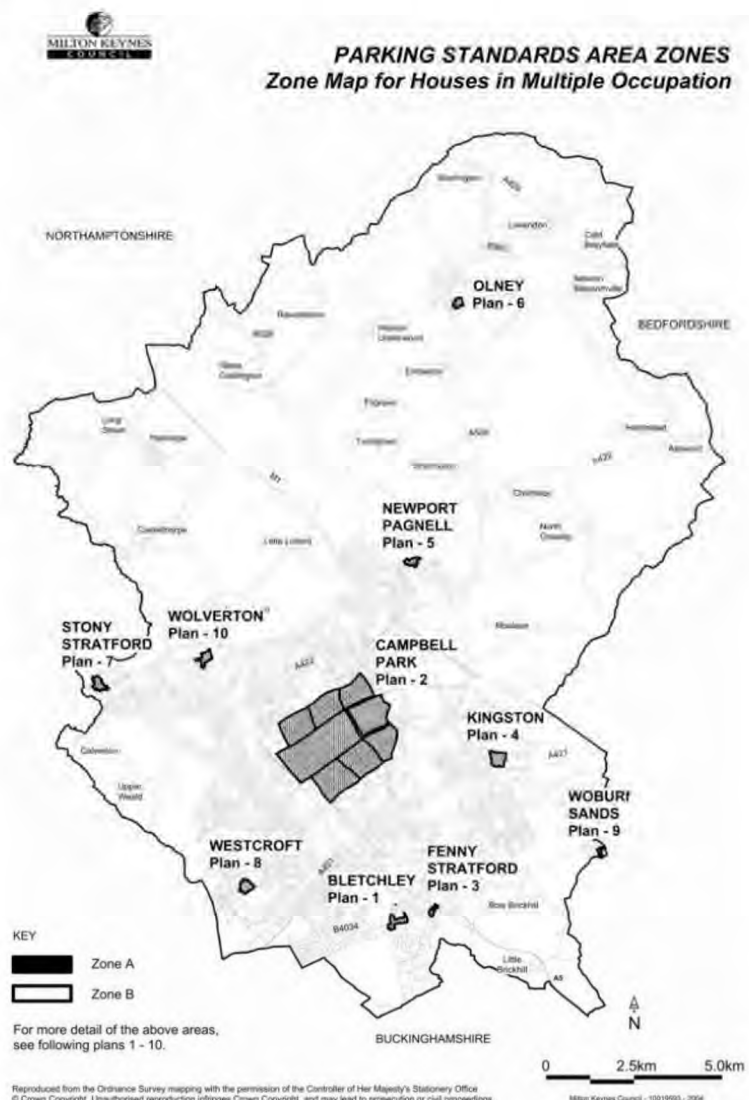
As you may know, planning applications for new HMOs are subject to a set of parking standards contained in MKC's [Parking Standards Supplementary Planning Document \(SPD\)](#), adopted in January 2016.

We are currently reviewing the suitability of these standards to suit the needs of HMOs.

## Current HMO Parking Standards:

Parking requirements for new HMO properties follow a two-zone approach based on the zone map opposite.

- **Zone A** (*Town and District centres and the estates surrounding MK:*)  
**0.5 parking spaces per bedroom**
- **Zone B** (*all other areas where public transport is more limited*):  
**parking is based on the formula  $n-1$ , where  $n$  = number of bedrooms** (eg. 6 bedrooms = 5 spaces)



## HMO Parking Demand Questionnaire:

<p><b>1. How do the current parking requirements for new HMOs serve the demand of properties you manage?</b>  <i>If you do not manage any properties that have been subject to these planning requirements, please answer based on your understanding of tenant demand. (MKC's current parking requirements are detailed on previous page)</i></p>						
<p><b>2. a. Do you think Zones A and B (see previous page) appropriately distinguish the different characteristics of the areas?</b></p>					<input type="radio"/> Yes	<input type="radio"/> No
<p><b>b. If NO, do you have suggestions for changes to the two-zone approach?</b>          In your answer, please consider:</p> <ul style="list-style-type: none"> <li>■ Tenant demographic</li> <li>■ Access to facilities</li> <li>■ Access to public transport</li> <li>■ 'Walkability' of the area</li> <li>■ Access to cycle facilities</li> </ul>						
<p><b>3. How important is car parking to prospective tenants of HMOs?</b>          Please answer on a scale of 1 (very important) – 5 (not at all important)</p>						
<ul style="list-style-type: none"> <li>■ Zone A (Town and District centres and the estates surrounding CMK):</li> </ul>	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input type="radio"/> 5	<input type="radio"/> N/A
<ul style="list-style-type: none"> <li>■ Zone B (all other areas where public transport is more limited):</li> </ul>	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input type="radio"/> 5	<input type="radio"/> N/A
<p><i>Do you have any further observations on Question 3?</i></p>						

<p><b>4. How important is providing car parking for <u>landlords</u> of HMOs?</b> Please answer on a scale of 1 (very important) – 5 (not at all important)</p>						
<p>■ <b>Zone A</b> (Town and District centres and the estates surrounding CMK):</p>	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input type="radio"/> 5	<input type="radio"/> N/A
<p>■ <b>Zone B</b> (all other areas where public transport is more limited):</p>	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input type="radio"/> 5	<input type="radio"/> N/A

*Do you have any further observations on Question 4?*

<p><b>5. How easy is it to meet the current parking standard requirements for new HMOs?</b> Please answer on a scale of 1 (very easy) – 5 (very difficult) <i>Note: this relates to OFF-STREET parking only</i></p>						
<p>■ <b>Zone A</b> (Town and District centres and the estates surrounding CMK):</p>	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input type="radio"/> 5	<input type="radio"/> N/A
<p>■ <b>Zone B</b> (all other areas where public transport is more limited):</p>	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input type="radio"/> 5	<input type="radio"/> N/A

*Do you have any further observations on Question 5?*

**6. Please provide any general issues / observations you have on vehicle parking for HMOs**

**7. Please detail any general issues / observations you have noted for HMO parking for the following vehicle types.**

Some points you may wish to consider:

- *Approximate demand for these parking types*
- *How does tenant demographic affect parking demand for these vehicles?*
- *Do landlords seek to provide for these?*
- *Would providing these parking types significantly increase attractiveness of a property for prospective tenants?*
- *Do you see demand for these changing in the future amongst HMO tenants?*

Electric or Low-Emission Vehicles	
Blue Badge Holder Parking	
Powered Two-Wheelers (mopeds / motorcycles)	
Pedal cycles	
<b>Any further comments?</b>	

**Thank you for your input!**



## Build to Rent

**Caitlin King**

---

**Subject:** Milton Keynes Council - Have your say on Parking Standards for new Build to Rent schemes  
**Attachments:** B2R Parking Requirements Questionnaire.pdf

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Hello,

**On Behalf of Milton Keynes Council –  
Have your say on Parking Standards for new Build to Rents**

As Milton Keynes sees increasing development of Build to Rent schemes, we are currently reviewing the suitability of the current residential parking standards that they are subject to.

We are aiming to establish whether parking requirements from Build to Rent developments differ from standard C3 residential needs.

We would greatly value your input based on your experience of managing B2R properties, both within Milton Keynes and UK-wide.

I have attached a form containing some information on the current parking standards, and 8 questions which I would be very grateful if you would answer and return to me.

If you have any queries on this, please do not hesitate to contact me on my details below.

**Caitlin King**  
Senior Transport Planner  
Project Centre  
[REDACTED]  
[www.projectcentre.co.uk](http://www.projectcentre.co.uk)

## Introduction:

We (Project Centre Ltd) have been commissioned by Milton Keynes Council (MKC) to undertake a review of parking requirements and standards for 'Build to Rent' (B2R's) within Milton Keynes.

As you may know, planning applications for new B2Rs are subject to a set of parking standards contained in MKC's **Parking Standards Supplementary Planning Document (SPD)**. They fall under the C3 land use classification 'Dwellinghouses'.

We are currently reviewing the suitability of these standards for B2Rs, and whether a separate classification is required for setting parking standards. Current issues with B2R developments are:

- There is a lack of definition around B2R for planning purposes.
- Excessive car parking requirements for planning, as:
  - Most B2R developments are situated in urban/town centre locations, close to public transport connections<sup>1</sup>.
  - It is likely that occupiers of B2R properties are less likely to require a private car in relation to those living in the wider PRS<sup>2</sup>.

## Current Parking Standards:

Parking requirements for new B2R properties, under the land use classification C3 'Dwellinghouses' are shown in the table below.

Zones 1-4 relate to accessibility; Zone 1 is most central / urban, whilst Zone 4 is rural. A map showing the exact zones is in Appendix A of the parking standards (linked above).

Use Class	Accessibility Zone			
	Zone 1 <small>Note: for CMK and Campbell Park the parking standards in the CMK Business Neighbourhood Plan apply (see Appendix C)</small>	Zone 2	Zone 3	Zone 4
<b>C3 - Residential Dwellings (per unit)</b>				
• 1 bedroom dwellings	1	1+0.33 unallocated	1+0.33 unallocated	1+0.33 unallocated
• 2 bedroom flat	1	1+0.33 unallocated	1+0.75 unallocated	1+0.75 unallocated
• 2 bedroom dwellings	1	1+0.33 unallocated	2+0.25 unallocated	2+0.25 unallocated
• 3 bedroom dwellings	2	2+0.33 unallocated	2+0.5 unallocated	2+0.5 unallocated
• 4+ bedroom dwellings	2	2+0.33 unallocated	2+0.5 unallocated	3+0.33 unallocated

We would be grateful for your answers to the following questions, regarding the suitability of the parking standards for B2R properties that you currently manage.

<sup>1</sup> British Property Foundation, Unlocking the benefits and Potential of Build to Rent. Viewed Online: Jan 2021

<sup>2</sup> As above

## B2R Parking Demand Questionnaire:

- 1. How do the current parking requirements for new B2R's serve the demand of properties you manage?**

*If you do not manage any properties that have been subject to these planning requirements, please answer based on your understanding of tenant demand. (MKC's current parking requirements are detailed on the previous page)*

- 2. What would you estimate the average car ownership per B2R dwelling to be?**

Bedrooms	1	2	3+
Car Ownership (per Dwelling)			

*Please include any further observations on Question 2*

- 3. How important is car parking to prospective tenants of B2Rs?**

*Please answer on a scale of 1 (very important) – 5 (not at all important)*

<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input type="radio"/> 5	<input type="radio"/> N/A
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*Please include any further observations on Question 3*

**4. How important access to public transport for prospective tenants of B2Rs?**  
 Please answer on a scale of 1 (very important) – 5 (not at all important)

<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input type="radio"/> 5	<input type="radio"/> N/A
-------------------------	-------------------------	-------------------------	-------------------------	-------------------------	---------------------------

Please include any further observations on Question 4

**5. How easy is it to meet the current parking standard requirements for new B2Rs?**  
 Please answer on a scale of 1 (very easy) – 5 (very difficult)  
 Note: this relates to OFF-STREET parking only. If you do not have any properties in Milton Keynes, please answer based on your general UK-wide experience.

<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input type="radio"/> 5	<input type="radio"/> N/A
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Please include any further observations on Question 5

**6. How does car ownership relate to the access of public transport facilities?**  
 E.g. is car ownership lower in areas where public transport accessible?

**7. Please provide any general issues / observations you have on vehicle parking for B2Rs**

**8. Please detail any general issues / observations you have noted for B2R parking for the following vehicle types.**

Some points you may wish to consider:

- *Approximate demand for these parking types*
- *How does tenant demographic affect parking demand for these vehicles?*
- *Do B2R managers seek to provide for these?*
- *Would providing these parking types significantly increase attractiveness of a property for prospective tenants?*
- *Do you see demand for these changing in the future amongst B2R tenants?*

Electric or Low-Emission Vehicles	
Blue Badge Holder Parking	
Powered Two-Wheelers (mopeds / motorcycles)	
Pedal cycles	

**Any further comments?**

**Thank you for your input!**

## Appendix B

### Questionnaire Responses

## Houses in Multiple Occupation



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## Introduction:

We (Project Centre Ltd) have been commissioned by Milton Keynes Council (MKC) to undertake a review of parking requirements and standards for 'Houses of Multiple Occupation' (HMO's) within Milton Keynes.

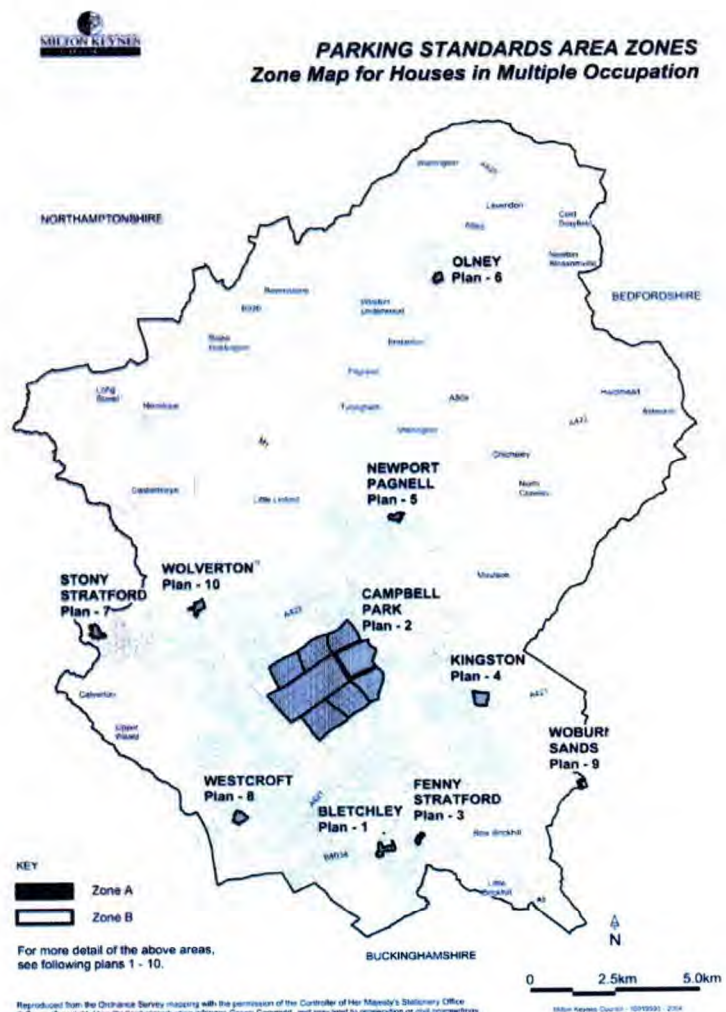
As you may know, planning applications for new HMOs are subject to a set of parking standards contained in MKC's **Parking Standards Supplementary Planning Document (SPD)**, adopted in January 2016.

We are currently reviewing the suitability of these standards to suit the needs of HMOs.

## Current HMO Parking Standards:

Parking requirements for new HMO properties follow a two-zone approach based on the zone map opposite.

- **Zone A** (Town and District centres and the estates surrounding CMK):  
**0.5 parking spaces per bedroom**
- **Zone B** (all other areas where public transport is more limited):  
**parking is based on the formula  $n-1$ , where  $n$  = number of bedrooms**  
(eg. 6 bedrooms = 5 spaces)



## HMO Parking Demand Questionnaire:

**1. How do the current parking requirements for new HMOs serve the demand of properties you manage?**  
 If you do not manage any properties that have been subject to these planning requirements, please answer based on your understanding of tenant demand.  
 (MKC's current parking requirements are detailed on previous page)

Totally ridiculous. We have found from the person type living in the HMO's that we manage in the poorer estates that they do not have cars. Making such vast requirements for parking means suitable share

**2. a. Do you think Zones A and B (see previous page) appropriately distinguish the different characteristics of the areas?**

Yes      No

d Accom. can not go ahead.

**b. If NO, do you have suggestions for changes to the two-zone approach?**  
 In your answer, please consider:

- Tenant demographic
- Access to facilities
- Access to public transport
- 'Walkability' of the area
- Access to cycle facilities

*(Empty space for handwritten notes)*

**3. How important is car parking to prospective tenants of HMOs?**  
 Please answer on a scale of 1 (very important) – 5 (not at all important)

■ Zone A (Town and District centres and the estates surrounding CMK):	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5	<input type="radio"/> N/A
■ Zone B (all other areas where public transport is more limited):	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5	<input type="radio"/> N/A

Do you have any further observations on Question 3?

We have very good bus routes and redways in MK. More emphasis should be put on bike storage rather than parking, especially in the poorer estates.

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4. How important is providing car parking for landlords of HMOs?  
Please answer on a scale of 1 (very important) – 5 (not at all important)

■ Zone A (Town and District centres and the estates surrounding CMK):	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5	<input type="radio"/> N/A
■ Zone B (all other areas where public transport is more limited):	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5	<input type="radio"/> N/A

Do you have any further observations on Question 4?

5. How easy is it to meet the current parking standard requirements for new HMOs?  
Please answer on a scale of 1 (very easy) – 5 (very difficult)  
Note: this relates to OFF-STREET parking only

■ Zone A (Town and District centres and the estates surrounding CMK):	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5	<input type="radio"/> N/A
■ Zone B (all other areas where public transport is more limited):	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5	<input type="radio"/> N/A

Do you have any further observations on Question 5?

impossible - MK just isn't built with such ample parking.

6. Please provide any general issues / observations you have on vehicle parking for HMOs

HMO tenants in the main just don't have cars. Turning away good quality shared accommodation due to lack of parking is not a sensible approach.

Why not just add to licencing a limit on number of vehicles associated with a property so that landlords can select tenants accordingly.

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7. Please detail any general issues / observations you have noted for HMO parking for the following vehicle types.

Some points you may wish to consider:

- Approximate demand for these parking types
- How does tenant demographic affect parking demand for these vehicles?
- Do landlords seek to provide for these?
- Would providing these parking types significantly increase attractiveness of a property for prospective tenants?
- Do you see demand for these changing in the future amongst HMO tenants?

Electric or Low-Emission Vehicles	None
Blue Badge Holder Parking	None
Powered Two-Wheelers (mopeds / motorcycles)	None
Pedal cycles	High demand

Any further comments?

- ① take away minimum parking requirements
- ② Introduce maximum vehicles associated with a property as part of the licensing.
- ③ Insist on push bike storage.

Thank you for your input!

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## Introduction:

We (Project Centre Ltd) have been commissioned by Milton Keynes Council (MKC) to undertake a review of parking requirements and standards for 'Houses of Multiple Occupation' (HMO's) within Milton Keynes.

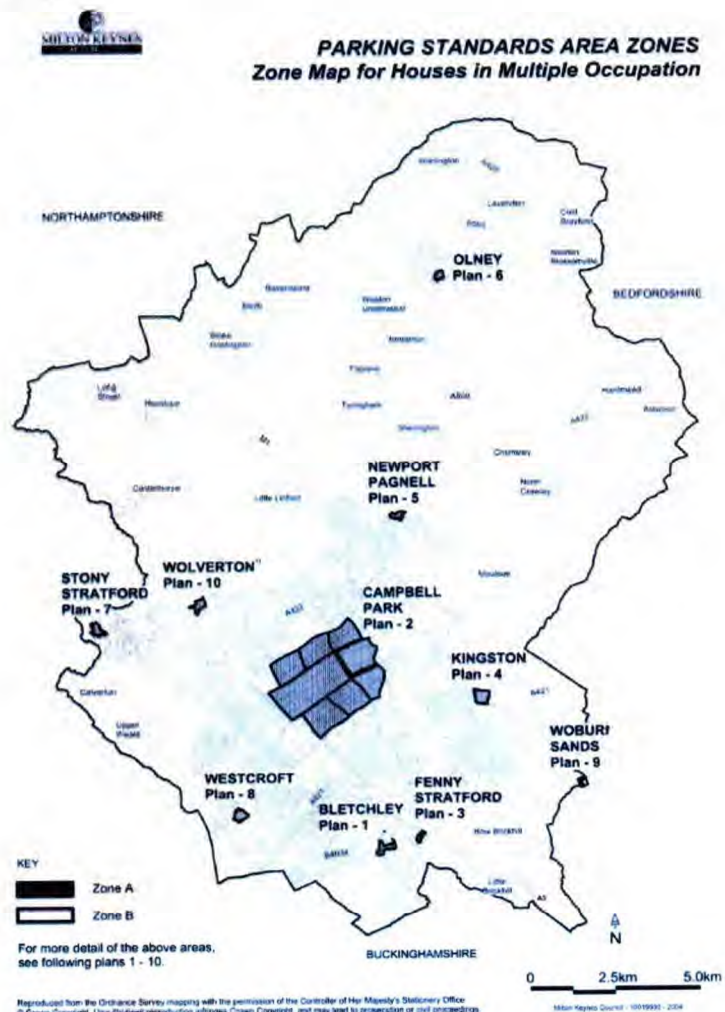
As you may know, planning applications for new HMOs are subject to a set of parking standards contained in MKC's **Parking Standards Supplementary Planning Document (SPD)**, adopted in January 2016.

We are currently reviewing the suitability of these standards to suit the needs of HMOs.

## Current HMO Parking Standards:

Parking requirements for new HMO properties follow a two-zone approach based on the zone map opposite.

- **Zone A** (*Town and District centres and the estates surrounding CMK*):  
**0.5 parking spaces per bedroom**
- **Zone B** (*all other areas where public transport is more limited*):  
**parking is based on the formula  $n-1$ , where  $n$  = number of bedrooms**  
(eg. 6 bedrooms = 5 spaces)



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## HMO Parking Demand Questionnaire:

<p><b>1. How do the current parking requirements for new HMOs serve the demand of properties you manage?</b>  <i>If you do not manage any properties that have been subject to these planning requirements, please answer based on your understanding of tenant demand. (MKC's current parking requirements are detailed on previous page)</i></p>							
<p><i>We find that we very rarely have occupants that have cars on one HMO's that we manage, particularly in the less affluent estates of MK. Parking spaces therefore not required and go unused.</i></p>							
<p><b>2. a. Do you think Zones A and B (see previous page) appropriately distinguish the different characteristics of the areas?</b></p>					<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>		
<p><b>b. If NO, do you have suggestions for changes to the two-zone approach?</b>                  In your answer, please consider:</p> <ul style="list-style-type: none"> <li>■ Tenant demographic</li> <li>■ Access to facilities</li> <li>■ Access to public transport</li> <li>■ 'Walkability' of the area</li> <li>■ Access to cycle facilities</li> </ul>							
<p><b>3. How important is car parking to prospective tenants of HMOs?</b>                  Please answer on a scale of 1 (very important) – 5 (not at all important)</p>							
<p>■ <b>Zone A</b> (Town and District centres and the estates surrounding CMK):</p>		<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5	<input type="radio"/> N/A
<p>■ <b>Zone B</b> (all other areas where public transport is more limited):</p>		<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5	<input type="radio"/> N/A
<p><i>Do you have any further observations on Question 3?</i></p>							
<p><i>Not really. Very rarely asked about parking, more emphasis is on bus routes or taxis. We do frequently experience requests for bike storage.</i></p>							

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<b>4. How important is providing car parking for landlords of HMOs?</b> Please answer on a scale of 1 (very important) – 5 (not at all important)						
■ Zone A (Town and District centres and the estates surrounding CMK):	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5	<input type="radio"/> N/A
■ Zone B (all other areas where public transport is more limited):	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5	<input type="radio"/> N/A
Do you have any further observations on Question 4?						
<b>5. How easy is it to meet the current parking standard requirements for new HMOs?</b> Please answer on a scale of 1 (very easy) – 5 (very difficult) Note: this relates to OFF-STREET parking only						
■ Zone A (Town and District centres and the estates surrounding CMK):	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5	<input type="radio"/> N/A
■ Zone B (all other areas where public transport is more limited):	<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5	<input type="radio"/> N/A
Do you have any further observations on Question 5?						
Not easy at all. There just isn't enough space available for such parking requirements. The newer estates for example barely offer any <del>parking</del> parking at all						
<b>6. Please provide any general issues / observations you have on vehicle parking for HMOs</b>						
Parking spaces is never a concern for our HMO tenants in our experience. Room accommodation is of high demand in MK. It seems silly to be turning down good shared accommodation for licensing based on unused car parking spaces.						

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7. Please detail any general issues / observations you have noted for HMO parking for the following vehicle types.

Some points you may wish to consider:

- Approximate demand for these parking types
- How does tenant demographic affect parking demand for these vehicles?
- Do landlords seek to provide for these?
- Would providing these parking types significantly increase attractiveness of a property for prospective tenants?
- Do you see demand for these changing in the future amongst HMO tenants?

Electric or Low-Emission Vehicles	NONE
Blue Badge Holder Parking	NONE
Powered Two-Wheelers (mopeds / motorcycles)	RARELY
Pedal cycles	HIGH DEMAND
<b>Any further comments?</b>	
<p>1) introduce vehicle units associated with a property and include it in one licensing</p> <p>2) take away minimum parking requirements</p> <p>3) include push bike storage</p>	

Thank you for your input!



## Build to Rent

## Introduction:

We (Project Centre Ltd) have been commissioned by Milton Keynes Council (MKC) to undertake a review of parking requirements and standards for 'Build to Rent' (B2R's) within Milton Keynes.

As you may know, planning applications for new B2Rs are subject to a set of parking standards contained in MKC's **Parking Standards Supplementary Planning Document (SPD)**. They fall under the C3 land use classification 'Dwellinghouses'.

We are currently reviewing the suitability of these standards for B2Rs, and whether a separate classification is required for setting parking standards. Current issues with B2R developments are:

- There is a lack of definition around B2R for planning purposes.
- Excessive car parking requirements for planning, as:
  - Most B2R developments are situated in urban/town centre locations, close to public transport connections<sup>1</sup>.
  - It is likely that occupiers of B2R properties are less likely to require a private car in relation to those living in the wider PRS<sup>2</sup>.

## Current Parking Standards:

Parking requirements for new B2R properties, under the land use classification C3 'Dwellinghouses' are shown in the table below.

Zones 1-4 relate to accessibility; Zone 1 is most central / urban, whilst Zone 4 is rural. A map showing the exact zones is in Appendix A of the parking standards (linked above).

Use Class	Accessibility Zone			
	Zone 1 <small>Note: for CMX and Campbell Park the parking standards in the CMX Business Neighbourhood Plan apply (see Appendix C)</small>	Zone 2	Zone 3	Zone 4
<b>C3 - Residential Dwellings (per unit)</b>				
• 1 bedroom dwellings	1	1+0.33 unallocated	1+0.33 unallocated	1+0.33 unallocated
• 2 bedroom flat	1	1+0.33 unallocated	1+0.75 unallocated	1+0.75 unallocated
• 2 bedroom dwellings	1	1+0.33 unallocated	2+0.25 unallocated	2+0.25 unallocated
• 3 bedroom dwellings	2	2+0.33 unallocated	2+0.5 unallocated	2+0.5 unallocated
• 4+ bedroom dwellings	2	2+0.33 unallocated	2+0.5 unallocated	3+0.33 unallocated

We would be grateful for your answers to the following questions, regarding the suitability of the parking standards for B2R properties that you currently manage.

<sup>1</sup> British Property Foundation, Unlocking the benefits and Potential of Build to Rent. Viewed Online: Jan 2021

<sup>2</sup> As above

## B2R Parking Demand Questionnaire:

**1. How do the current parking requirements for new B2R's serve the demand of properties you manage?**

*If you do not manage any properties that have been subject to these planning requirements, please answer based on your understanding of tenant demand. (MKC's current parking requirements are detailed on the previous page)*

In our experience the demographic of BTR tenants are less reliant on car ownership. Our BTR sites are located in highly accessible city centre locations with excellent public transport links, therefore the need for a tenant to own a car is usually low.

Depending on the location, our developments usually provide between 0-30% which aligns with tenant demand.

**2. What would you estimate the average car ownership per B2R dwelling to be?**

Bedrooms	1	2	3+
Car Ownership (per Dwelling)	25%	25%	25%

*Please include any further observations on Question 2*

**3. How important is car parking to prospective tenants of B2Rs?**

*Please answer on a scale of 1 (very important) – 5 (not at all important)*

<input type="radio"/> 1	<input type="radio"/> 2	<input type="radio"/> 3	<input type="radio"/> 4	<input checked="" type="radio"/> 5	<input type="radio"/> N/A
-------------------------	-------------------------	-------------------------	-------------------------	------------------------------------	---------------------------

*Please include any further observations on Question 3*

Demand for car parking is usually low due to the highly accessible locations of our BTR development with access to good public transport links and also car club schemes provided on site.

**4. How important access to public transport for prospective tenants of B2Rs?**

*Please answer on a scale of 1 (very important) – 5 (not at all important)*

1   
  2   
  3   
  4   
  5   
  N/A

*Please include any further observations on Question 4*

**5. How easy is it to meet the current parking standard requirements for new B2Rs?**

**Please answer on a scale of 1 (very easy) – 5 (very difficult)**

*Note: this relates to OFF-STREET parking only. If you do not have any properties in Milton Keynes, please answer based on your general UK-wide experience.*

1   
  2   
  3   
  4   
  5   
  N/A

*Please include any further observations on Question 5*

Current parking standards don't align with demand for parking spaces within BTR schemes. Car free developments should be promoted alongside sustainable transport measures such as car club schemes, cycle spaces and improvements to public transport.

**6. How does car ownership relate to the access of public transport facilities?**

*E.g. is car ownership lower in areas where public transport accessible?*

Car ownership and demand for parking is lower where there are good public transport links.

**7. Please provide any general issues / observations you have on vehicle parking for B2Rs**

We are currently developing a 294 apartment BTR scheme on Avebury Boulevard and would be happy to liase with you pre/post completion if that would help with your current research.

**8. Please detail any general issues / observations you have noted for B2R parking for the following vehicle types.**

Some points you may wish to consider:

- *Approximate demand for these parking types*
- *How does tenant demographic affect parking demand for these vehicles?*
- *Do B2R managers seek to provide for these?*
- *Would providing these parking types significantly increase attractiveness of a property for prospective tenants?*
- *Do you see demand for these changing in the future amongst B2R tenants?*

Electric or Low-Emission Vehicles	Increasing demand for electric car charging points to be provided where we are providing parking spaces. Car charging points are included within most of our BTR developments.
Blue Badge Holder Parking	Relatively small demand for blue badge parking spaces. We provide a smaller number in most of our BTR developments.
Powered Two-Wheelers (mopeds / motorcycles)	Very little demand and not often provided within our BTR developments.
Pedal cycles	Cycle provision usually provided in line with local policy. This usually results in an over provision of cycle spaces within developments.  In the same way parking standards are lower in BTR and residents are offered the use of car club schemes, a similar approach could be taken with cycle spaces.

**Any further comments?**

**Thank you for your input!**

## Appendix C



### Report Figures

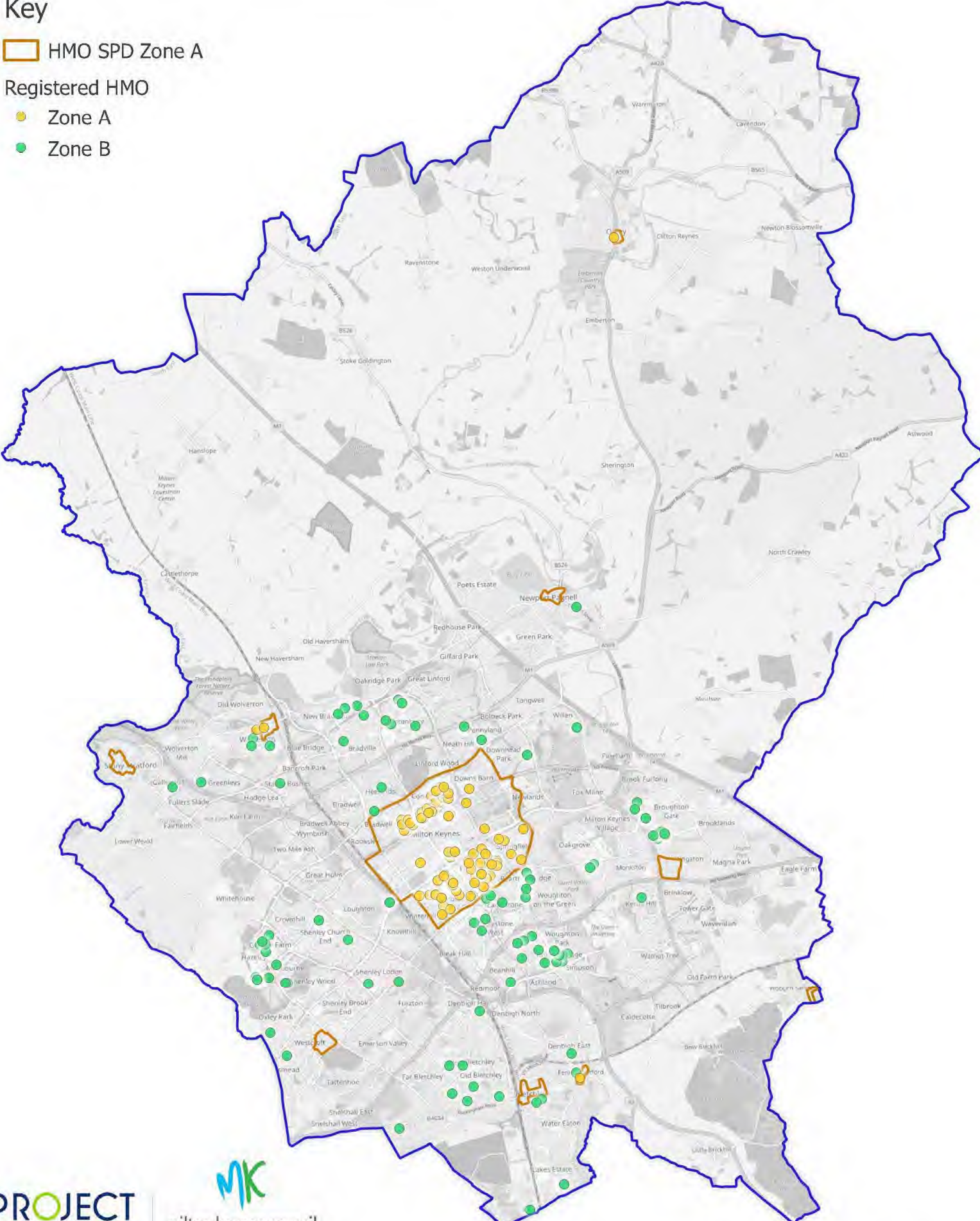
# Registered Houses in Multiple Occupation

## Key

 HMO SPD Zone A

## Registered HMO

-  Zone A
-  Zone B



# HMO Zone A - Outer Areas

Stony Stratford



Wolverton



Olney



Newport Pagnell



Westcroft



Kingston



Bletchley



Fenny Stratford



Woburn Sands

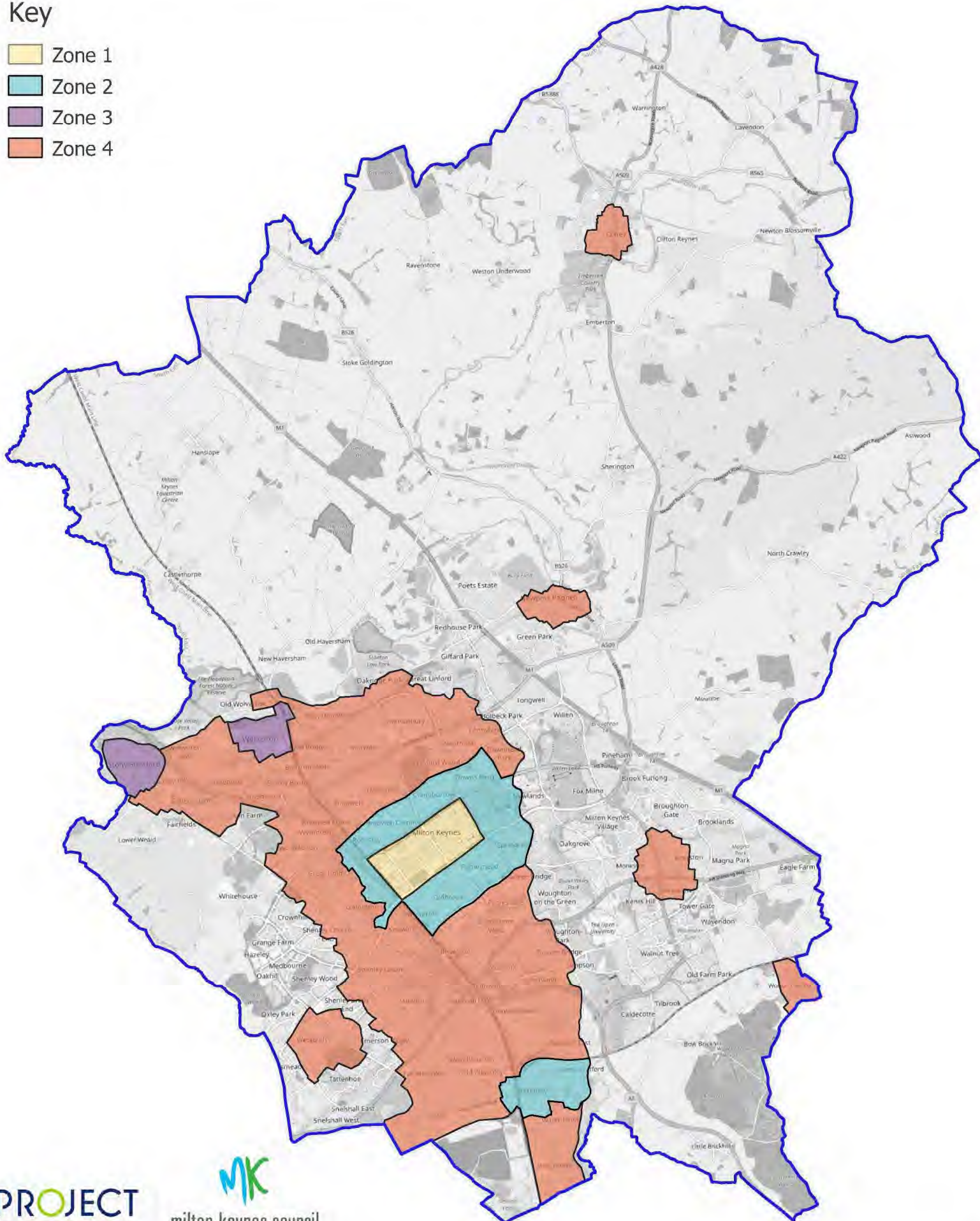




# Milton Keynes Draft HMO Accessibility Zones

## Key

- Zone 1
- Zone 2
- Zone 3
- Zone 4

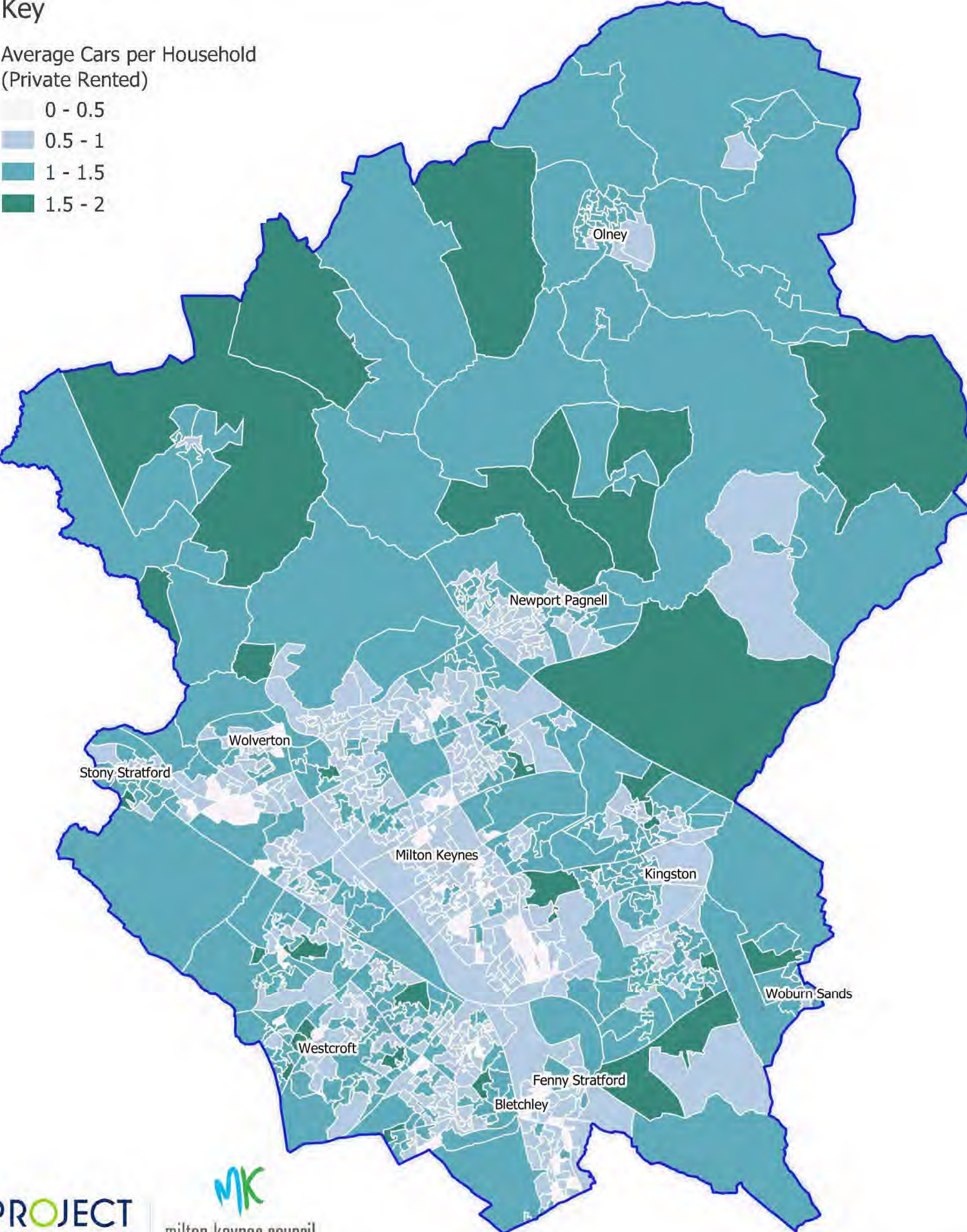


# Average Car Ownership Private Rented Tenures

## Key

Average Cars per Household  
(Private Rented)

- 0 - 0.5
- 0.5 - 1
- 1 - 1.5
- 1.5 - 2



## Quality

It is the policy of Project Centre to supply Services that meet or exceed our clients' expectations of Quality and Service. To this end, the Company's Quality Management System (QMS) has been structured to encompass all aspects of the Company's activities including such areas as Sales, Design and Client Service.

By adopting our QMS on all aspects of the Company, Project Centre aims to achieve the following objectives:

1. Ensure a clear understanding of customer requirements;
2. Ensure projects are completed to programme and within budget;
3. Improve productivity by having consistent procedures;
4. Increase flexibility of staff and systems through the adoption of a common approach to staff appraisal and training;
5. Continually improve the standard of service we provide internally and externally;
6. Achieve continuous and appropriate improvement in all aspects of the company;

Our Quality Management Manual is supported by detailed operational documentation. These relate to codes of practice, technical specifications, work instructions, Key Performance Indicators, and other relevant documentation to form a working set of documents governing the required work practices throughout the Company.

All employees are trained to understand and discharge their individual responsibilities to ensure the effective operation of the Quality Management System.



## Award Winning



## Certifications



## Accreditations



## Memberships



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