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Parking and Accessibility SPD

Issues and Options Consultation 2021

Response from the City of Durham Trust

Context

In 2019 Durham County Council declared a climate emergency.

In that year surface transport was responsible for around 22% of greenhouse gas emissions, and emissions for transport have hardly fallen since the 1992 United Nation Framework Convention on Climate Change. The UK's Climate Change Committee's Sixth Carbon Budget[1] recommends a 78% reduction in UK territorial emissions between 1990 and 2035. Unfortunately, because of lack of progress over the last thirty years, this now equates to a 63% reduction between 2019 and 2035. The contribution recommended for surface transport is effectively 5% each year over the next 14 years.

As Tony Meehan, the Transport Consultancy Practice Director at Atkins writes in TransportXtra[2], "Transport technology alone simply can't achieve the pace of transport decarbonisation needed to meet the carbon budgets and align with the Paris Agreement objectives." It will not be sufficient to rely on a switch to electric vehicles. Reductions in journeys and a switch to public transport, walking and cycling are essential. The CCC Sixth Carbon Budget includes four steps in its key recommendations, and the third is "Reducing demand for carbon-intensive activities" which includes in its vision "There are fewer car miles travelled and demand for flights grows more slowly".

The transport minister Grant Shapps recently stated that by 2030 the government wants half of all urban journeys to be by walking or cycling[3], which reinforces the 2020 DfT report *Decarbonising transport: setting the challenge*[4] in which the minister states (p. 3) that "public transport and active travel will be the natural first choice for our daily activities". It has been calculated that to meet the aspirations for 2030, 1 in 3 car trips in urban areas would have to switch to walking or cycling, assuming that the target is not to be achieved by reducing public transport trips.

1 https://www.theccc.org.uk/publication/sixth-carbon-budget/
2 Travel behaviours are the key to engineering net zero (Tony Meehan, February 2021, Local Transport Today) https://www.transportxtra.com/publications/local-transport-today/news/68067/travel-behaviours-are-the-key-to-engineering-net-zero
3 https://road.cc/content/news/govt-wants-half-urban-trips-walked-or-cycled-2030-280667
4 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf

To achieve changes of such magnitude, Durham County Council will need to use every tool available. Most interventions will take time to produce results and we have no time to waste.

The Tyndall Centre for Climate Change Research at the University of Manchester has produced a report for each local authority quantifying the implications of the Paris Agreement. In the case of County Durham, the report[5] calculates that County Durham's share of the UK's remaining carbon dioxide emissions budget is 16.6 million tonnes ($MtCO_2$) for the period 2020 to 2100.

At 2017 emission levels, County Durham would use this entire budget within 7 years from 2020.

How is Durham County Council responding to this situation which has now become an emergency?

Six years ago, in 2015, work started on the production of the *Durham City Sustainable Transport Delivery Plan* which was formally adopted in 2019. No progress report has been published since the first in 2019, and while there has been a little progress on cycle infrastructure and on securing workplace travel plans through the planning system, the rate of change is insufficient to produce the carbon reductions needed. The production of Local Cycling and Walking Infrastructure Plans for the main towns is behind schedule, and the Planning Authority continues to approve applications which, in the Trust's opinion, pay insufficient regard to walking and cycling access, including that for the Aykley Heads Business Park, DM/20/01846/FPA.

Transport is one of the top three priorities identified for action in the *Climate Emergency Response: Action Plan 2020 to 2022* (Durham County Council, February 2020) but the need to reduce car journeys is not recognised in the action plan.

Against this backdrop Durham County Council has produced a *Parking and Accessibility SPD: Issues and Options Consultation* document which is narrow in scope and does not make full use of the powers available to the authority to promote sustainable transport in accordance with the National Planning Policy Framework (NPPF). Para. 1.5 speaks of “the need to strike an appropriate balance between ensuring an adequate provision and discouraging excessive car use that can undermine cycling, walking and public transport”, but there is no suggestion anywhere in the document that the balance needs to be changed in any significant way, or that the climate emergency has any bearing on how we devise land use policies.

The Council's approach to the SPD

The Trust takes issue with the Council's statements in paragraph 1.6 on the ineffectiveness of using car parking restraint in residential areas, and on the national policy context that led to the Council abandoning maximum parking standards for residential development.

It is true that there were issues with the blanket maximum parking rate of 1.5 spaces per dwelling which was imposed by national government. This mandate was withdrawn in 2006, but councils were still free to impose such a limit. With the change of government in 2010, the transport minister of the day, Philip Hammond, declared “an end to Labour's war on the motorist”. The withdrawal of PPG13 in 2011 was a highly politicised and largely unevidenced change in national policy. Academic research has come to different conclusions. Steve Melia, a transport lecturer at University of the West of England, Bristol, discusses residential car parking in *Urban transport without the hot air* (UIT, 2015, p. 55-59) and concludes that contrary to the steer from central government, limits on

5 Setting Climate Committments for County Durham: Quantifying the implications of the United Nations Paris Agreement for County Durham (Tyndall Centre for Climate Change Resrarch, February 2021) https://carbonbudget.manchester.ac.uk/reports/E06000047/

availability of residential car parking do have an impact on car ownership and car use, and that this can be achieved without detrimental social issues **providing on-street parking controls are in place**.

A recent academic paper[6] has demonstrated a strong causal link: provision (or lack) of car parking at a property affects people's decisions on car ownership and car use, confirming Steve Melia's conclusions. The availability of public transport was found to be a weaker determinant in car ownership levels than the availability of parking. Parking availability had no impact on employment or job mobility.

An important factor as to whether maximum parking standards would be effective is whether the development is within a Controlled Parking Zone or there is control of on-street parking through restrictions such as double-yellow lines, coupled with adequate enforcement.

It is worth noting that NPPF makes no distinction between maximum parking standards for residential or non-residential developments. In each case there must be:

> a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport.

The Council has not fully articulated its own justification for maximum parking standards in para. 1.8, but has relied on the view of Mr William Fieldhouse, the Inspector of the County Plan, that these “should be implemented in accessible locations to encourage people to use more sustainable transport”.

The Inspector's actual words, in para. 162 of his final report were:

> In order to be effective, the policy needs to set out principles that will be used to determine car and cycle parking and storage provision in order to promote sustainable transport. These principles should encourage and reflect the potential for increased cycle ownership and use; limit the provision of car parking at destinations to encourage the use of sustainable modes of transport having regard to accessibility by walking, cycling and public transport; and provide residential parking having regard to car ownership levels and the need to make efficient use of land, as well as avoiding on street parking that would have an unacceptable impact on highway safety or severe impact on the road network.

The Inspector refers to “car ownership levels”, echoing NPPF paragraph 105(d), and “the need to make efficient use of land”, which is a reference to NPPF section 11. Restrictions on residential car parking provision can assist in achieving higher densities, and higher density residential development also improves the viability of public transport.

The fact that the Inspector has not directed the Council to set maximum parking standards for residential developments does not rule out that approach, and his mention of the need to make efficient use of land hints that he expected some restriction in provision. The Inspector was appointed to examine the County Durham Plan, and did not have sufficient evidence before him to be able to direct the council in any greater detail with respect to car parking standards.

6 A. Millard-Ball, J. West, N. Rezaei & G. Desai. What do residential lotteries show us about transportation choices? Forthcoming in *Urban Studies.* Preprint at https://people.ucsc.edu/~jwest1/articles/MillardBall_West_Rezaei_Desai_SFBMR_UrbanStudies.pdf

Justifying the application of maximum parking standards

The Trust considers that a number of factors particular to Durham City amount to a "clear and compelling justification" of the need to apply maximum parking standards to residential as well as non-residential developments. These include:

- managing the local road network to reduce car traffic and make room for protected space for sustainable modes as justified in the Durham City Sustainable Transport Delivery Plan;
- to support the demand management measures listed in Policy 22 of the County Plan, as identified by the Inspector;
- the need to improve air quality, particularly in the Air Quality Management Area;
- the protected characteristics of the Durham City Conservation Area which would be harmed by further car-centred growth;
- the setting of the World Heritage Site.

The County Council has previously introduced a congestion charging zone and a Park and Ride system. There is clearly ample recognition of the need to manage the local road network in the city.

Bath and North-East Somerset Council in their *Car Parking Standards*[7] of December 2015 made their justification for imposing maximum parking standards in these terms (p. 1):

> Given the levels of traffic congestion and associated poor air quality currently present in Bath, combined with its designation as a World Heritage Site, B&NES believes that there is a clear case for imposing parking standards in Bath, including the new Enterprise Area. The use of parking standards within Bath is a critical demand management tool that will enable the local authority to manage the local road network.

Nottingham City Council is at the forefront of sustainable transport in the UK, being the first authority to have introduced a workplace parking levy. In their Local Plan Part 2 (January 2020)[8] paragraph 4.183 goes further and points to the benefits for urban design that maximum parking standards can bring:

> More restrictive maximum parking levels are considered appropriate for the City Centre because of its accessibility and the opportunities this would create in terms of urban design. Availability of car parking has a major influence on the choice of means of transport. Levels of parking may be more significant than levels of public transport provision in determining how people travel, even for locations very well served by public transport. Car parking also takes up a large amount of space in development and reduces densities.

The Trust would like to see a similarly firm stance from the County Council in its approach to the SPD. The Council should also consider whether maximum parking standards ought to be applied to other town centres.

7 https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Transport/car_parking_standards_december_2015.pdf

8 Nottingham City land and planning policies: development plan document: local plan part 2 (Nottingham City Council, January 2020) https://documents.nottinghamcity.gov.uk/download/7574

Non-residential development

At the Examination in Public the Inspector queried whether the 2019 parking standards for non-residential uses were maxima or minima, because the tables of rates of provision were ambiguous. He then indicated that maximum parking standards would be appropriate, as subsequently set down in his final report. The Trust is concerned that the Issues and Options document appears to be setting out minimum standards for non-residential development, as Tables 1 to 4 label the third column “Parking Requirement”.

Nowhere does the NPPF direct that planning policies should include minimum parking standards[9]. Para. 102(e) mentions parking as one of several transport considerations which should be integral to the design of schemes. Paras. 105-6 do not mention minimum standards. On the level of an individual application, only clause 109 of NPPF could be used to compel a developer to provide car parking to a level beyond what is proposed, if the parking provision would cause “an unacceptable impact on highway safety” or if the “residual cumulative impact on the road network would be severe”.

The Trust therefore believes that to be consistent with the NPPF and the Inspector's directions, the SPD should be reframed without setting minimum standards for non-residential development in general. It would be appropriate to provide some guidance, but if a developer can justify a reduction in car parking because of the accessibility of the site or other initiatives they intend to take to encourage sustainable travel, that should be encouraged. Maximum standards should be set where appropriate, having regard to accessibility by other modes, as directed by the Inspector.

Scope of the SPD

Given that transport's contribution to greenhouse gas emissions, the council should be treating the SPD as part of a strategic response to the climate emergency, air quality, and the inactivity crisis. The current Issues and Options document does not appear to be satisfactorily tied in with other council policies and initiatives, including the *Durham City Sustainable Transport Delivery Plan*, the *County Durham Strategic Cycling and Walking Delivery Plan*, the *Climate Emergency Response Action Plan*, or the *Air Quality Action Plan for Durham City*. All these policies need to reinforce each other. As paragraph 2.3.16 of the Council's *Climate Emergency Response Action Plan* states, “we will require co-operation from all areas to achieve drastic decarbonisation of transport”.

Although the Inspector gave directions in his report outlining the principles of what had to be included in the SPD, there is nothing to prevent the Council from widening the scope of the SPD to include other aspects of transport accessibility in relation to planning applications, some of which were covered in previous standards issued by the Council.

2019 Parking and Accessibility Standards

The Issues and Options paper contains less detail, and has a narrower scope, than the Council's 2019 standards. It is not clear whether the current paper represents the full scope of what is to be included in the final SPD or whether the council has omitted some material because it is considered not necessary to consult on it. Omissions include:

- design principles and the user hierarchy (these are now outlined in the County Plan policies, but might reasonably be expanded upon in the SPD to reinforce the message).

9 None of the three authorities studied in Appendix A have set minimum parking standards for non-residential development.

- design aspects for car parking including landscaping, security, and pedestrian safety
- more detailed cycle parking guidance including on different types of provision, spacing and surveillance;
- motorcycle parking requirements.

The Inspector's report said that the SPD should make provision for powered two-wheelers. Motorbike storage has been included in the section on houses without garages (para. 4.11) but there is no other mention within the document of parking for motorbikes.

Regarding car parking design and landscaping, p. 24 of the Council's *Climate Emergency Response: Action Plan 2020 to 2022* mentions that "Solar Car Ports to be installed at Council car parks which could be used to provide the electricity to charge electric vehicles, including buses". Could developers be encouraged to include such features in new developments?

Application of SPD to redevelopment and to larger estates

Even in regard to car parking, the Issues and Options document concentrates on new developments, and is almost silent on how the policies would be applied to change of use or partial redevelopment of a site which includes parking, or how the parking provision for new development would be assessed when the proposal forms part of the estate of a larger organisation like Durham University. The single exception is paragraph 4.4 which applies the residential parking rates to extensions to dwellings. There is no statement as to how the requirements for EV charging would apply if a site with an existing car park was being redeveloped, or how overprovision of parking would be dealt with when planning applications arise for existing educational, employment, retail or leisure sites.

The Trust offers an example of how the previous parking policy has proved difficult to apply when determining planning applications, through a series of three related applications.

1. In September 2017 application DM/17/01682/FPA was approved for the construction of a new Teaching and Learning Centre for Durham University. The application provided only disabled parking spaces for users, and the Transport Statement simply reallocated the anticipated car journeys to other modes in proportion, claiming that there would be no highway impact. This was unjustifiable: with on-street car parking being available nearby it was always possible users would arrive by car. Moreover, the new centre was expressly intended to enable a significant expansion of student numbers which could not be without highway impact.

2. In September 2018 application DM/18/01650/FPA was approved for the construction of a new building for Mathematical Sciences and Computer Science on upper Mountjoy. Again, only disabled parking spaces were included, and the Transport Statement claimed the development was car-free. This was also unjustifiable: it was already known via public consultations that the University was planning to build additional car parks next to the new building.

3. In July 2019 application DM/19/01084/FPA was approved, which included the 215 space car park immediately adjacent to the new building. The Travel Plan submitted in discharge of one of the conditions was due to expire in 2020.

In this series of applications Durham University's transport consultants employed dubious methodologies in relation to the transport impact of its proposed developments. There was insufficient information available to the Planning Authority regarding the overall car parking provision and the likely impact of the increased numbers of staff and students that were to be brought into Durham. Subsequently the University's new Integrated Sustainable Travel Plan[10] for 2020-2025 has been published. Careful study of the plan suggests that the 215 space car park approved in July 2019 may not be required if the targets for reducing single-occupancy car use are met. The approval of that application may therefore undermine the Travel Plan.

The *Durham City Sustainable Transport Delivery Plan* (section 3.1.4) identifies as one of the principal challenges “the abundance of (often free) parking at major employers within the city” and refers to “reducing the supply and increasing the price of car parking at appropriate employment locations” as an important means to control demand for car travel. The Council needs to consider how to frame the SPD in order to ensure that clear data on car parking at major employers accompanies any planning applications. The SPD should also include the appropriate levers to ensure that charging for car parking is introduced in order to support travel plans. This will need to be co-ordinated with monitoring and review of the on-street parking around employment sites to ensure the commuter car parking does not simply spill onto to neighbouring streets.

Using the example of the University, as well as the numbers of car parking spaces, it would be necessary to supply data on the number of staff and students and the projected numbers of parking spaces and users into the future, together with travel surveys and a Travel Plan with a reasonable forward timeframe. It is not possible to assess the impact of major institutions without these data.

Controlled Parking Zone and Park and Ride

With one exception, the SPD does not directly consider the relationship of development to existing controlled parking zones, despite a site's location within a CPZ being the key enabler of car parking reduction. Nor is the potential need for extensions to the CPZ considered as part of the document.

The exception is in relation to student accommodation, where no requirement is made for car parking at student accommodation within the CPZ. Durham University policy is to provide minimal spaces for students even outside the CPZ. There is evidence that this does not always dissuade students from bringing cars to Durham, which then take spaces in nearby residential streets. The Durham City Neighbourhood Plan sought to cover the need to extend the CPZ if further PBSAs are built outside the CPZ, but the Examiner considered the policy too onerous and much of the detail was therefore removed. The Council should revisit this topic. The roads adjoining the newly opened South College and John Snow College have recently had double yellow lines applied, but there is a risk that student parking will creep into the neighbouring residential streets outside the CPZ.

The SPD is also silent on matters such as the Park and Ride system in Durham. Arguably, further car parking provision in the city undermines the Park and Ride, and provision of parking at new city centre sites should be commuted into support for extension to the Park and Ride car parks, provision of bus priority measures, and so on.

The congestion charge is not mentioned. Additional car parking within the congestion charge zone should surely be ruled out, with an aim to reduce provision over time. The need to consider the impact of new parking provision on the AQMA should also be highlighted.

10 https://www.dur.ac.uk/resources/greenspace/greentravel/DurhamUniversityIntegratedSustainableTravelPlan2020_25_Final.pdf

Travel plans

Although the Council has recently started requiring conformance with PAS 500:2008 for workplace travel plans, what is lacking in Council policies is any statement or benchmarking of the modal shift to be aimed for, either at the first occupation of a development, or over the life of the travel plan. Durham University has set a good example with its latest travel plan which calculates car travel reductions in line with the UK's emissions targets, and a similar reduction profile would be suitable for other developments in accessible locations. It is not clear how the Council assesses the framework travel plans which are submitted with planning applications, and whether any degree of consistency is achieved. The SPD could suggest suitable targets, either in absolute terms or relative to the census modal share for locations in the vicinity of the proposed development.

As an example, in 2016 planning application DM/15/03912/OUT was approved, for the site known as Integra 61. The Travel Plan estimated that 97% of employees would arrive by car and proposed a reduction of 5% over the first three years and 1% for the rest of the Travel Plan period. This was accepted, but what criteria does the Council apply, and how will the Council ensure developers deliver an appropriate share of emissions reductions, rather than making the problems worse?

While PAS 500:2008 provides a good basis, the Council should ensure that new travel plans include more emphasis on working from home, which seems the most likely way for transport emissions reductions to come about. Thus surveys and targets for modal share which do not look at how often people travel, and the actual distances, are pretty meaningless in bringing down emissions.

Innovative layouts

The Issues and Options document is based on the assumption that residential car parking will be provided predominantly on driveways (see para. 4.2), and that visitor spaces will be provided in properly designed on-street bays, which can also be used by households owning more cars than they can accommodate on the drive. Para. 4.7 refers to *Manual for Streets* to justify the mode of provision for visitor spaces, but the Council's assumption of in-curtilage provision seems to rule out other arrangements for providing car parking described in *Manual for Streets* which can be more efficient in accessible locations (see paragraphs 8.3.11 and 8.3.15 in particular). The Trust suggests that the Council should encourage more provision to be outwith the curtilage, in line with *Manual for Streets*. The provision of EV charge points will need to be considered if it is not in-curtilage.

Further justification for changing the balance away from in-curtilage provision is given in the Trust's response to question 10.

The Inspector, in para. 162 of his final report did refer to the need to “provide residential parking … avoiding on-street parking that would have an unacceptable impact on highway safety or severe impact on the road network” but it is possible to provide such car parking in various ways which are compatible with highway safety, and it cannot be that the Inspector intended to rule out on-street parking, as this would not be supported by the NPPF. The Durham City Neighbourhood Plan policy T2(b) states

> Any on-street parking in new streets should be provided in designated bays, or in small groups of spaces separated by planting, trees, seating or other features, and designed to ensure the safety and convenience of pedestrians, cyclists and public transport users.

Even where parking is provided in private spaces conveyed along with the dwelling, developers could be encouraged to produce innovative street layouts. There have been successful developments

where houses or apartments are arranged in small terraces or blocks accessible only via paths from the access road, with car parking in separate car parks or courts removed from the housing. This can be very effective for smaller houses, as gardens can be safeguarded from the risk of being converted to car parking. The situation of the houses is more pleasant, and such layouts provide space for children to play as well as encouraging sustainable transport. *Guidance Notes for Design Codes*[11] (MHCLG, January 2021) shows a wide variety of solutions for residential and urban car parking on p. 13-14. The Trust would like to see more recognition of the benefits of atypical housing layouts, whereas the Issues and Options document ossifies car-centric development designs.

Where there are accommodation blocks such as apartments in highly-accessible city-centre locations within a CPZ, limiting the car parking provided and decoupling the ownership of the apartments and the parking spaces can make more efficient use of land. The need to rent a parking space separately gives occupants an incentive to reduce the number of vehicles they use and improves the take-up of sustainable transport modes and car club membership.

Efficient land use in respect of residential car parking was one of the principles articulated by the Inspector in para. 162 of his final report. The Trust considers that the Issues and Options document does not give sufficient weight to this principle.

Provision for car clubs

Section 6.5.2 of the *Durham City Sustainable Transport Delivery Plan* recommends that strong support for the development and expansion of car clubs, not only in the city but across the county, be reflected in parking policy. Policy T2 of the *Durham City Neighbourhood Plan* is also supportive of car clubs. Policy 82, “Parking management” of the *Cambridge Local Plan 2018*[12] has useful wording on car clubs and on car-free or car-capped development which is not covered either in the County Plan or in the Issues and Options document. The Trust would like to see the new SPD incorporating similar policies to encourage the reduction of residential car parking rates where car club spaces are provided.

On-street parking and the urban environment

While the Issues and Options document covers on-street and off-street parking in new developments, there is a need for a broader strategy for the car parking in the city. The *Car Parking Strategy*[13] which forms part of the *Wiltshire Local Transport Plan 2011-2026* could provide a model for what to cover. Bath and North East Somerset Council has a comparable document[14] which is worth studying given the similarities of Durham and Bath. In each case the policies would need to be adapted for County Durham. The strategy could consider the approach to issuing residential parking permits to discourage student car use, and how to ensure appropriate turnover of pay-and-display spaces to serve the local economy. There was some controversy regarding proposals in 2019 to reduce the number of parking spaces on Church Street, but simple measures such as a shorter maximum stay for non-resident users could avoid some of the problems that were highlighted, such as the difficulty that social care providers have in finding a parking space. Measures such as “school streets” should be looked at across the county to encourage active travel, especially to primary schools.

11 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957207/Guidance_notes_for_Design_Codes.pdf
12 Cambridge Local Plan 2018, p. 236. https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf
13 https://cms.wiltshire.gov.uk/documents/s14737/
14 Balancing your needs: a parking strategy for Bath & North East Somerset, September 2017. https://www.bathnes.gov.uk/sites/default/files/parking_strategy_technical_report.pdf

There is often concern that the town centre economy will not survive without cheap and plentiful car parking. Town centre retailers naturally look to the out-of-town competition and see car parking as the remedy, but they often significantly underestimate the number of customers who arrive by other modes, while overestimating the footfall generated by large out-of-town car parks. Provision of car parking, and the congested traffic accessing it, can detract from the city centre environment and harm the very features which make the centre attractive and distinctive. These matters would need to be considered in a wider strategy. The Council needs to look at what message it is giving when there are promotions such as reduced parking charges in the approach to Christmas, and whether discounted bus tickets should also be offered to support sustainable options.

A holistic approach would also require a strategy on what streets are to be used for. This would be relevant for planning in terms of design of new developments, but such a strategy should also aim to improve existing streets. If car parking provision is reduced there is scope for other activities, and other street features:

- street trees and “parklets”
- space for play
- public benches
- secure cycle parking for terraced houses without other storage
- removal of parking to allow the widening of footways or cycle tracks
- improving the visual amenity of the city and the appreciation of architecture and townscape

Durham City Sustainable Transport Delivery Plan

Finally, the Durham City Sustainable Transport Delivery Plan (DCSTDP), which is only mentioned in the supporting text of the County Plan, not the policies themselves, includes a number of suggestions around transport accessibility and land use which should be considered for inclusion in the SPD to give them more weight in planning decisions.

Section 2.2.9 of DCSTDP points to the reduction of parking provided at major employment sites as an opportunity to influence peak hour travel. Section 3.1.4 reinforces this, referring to “reducing the supply and increasing the price of car parking at appropriate employment locations”. The only lever that the council possesses to effect this change is the planning system, however there is nothing in the Issues and Options document which would secure gradual reductions in employer-provided parking as planning applications arise, nor the introduction or increase of charges for workplace parking.

The Cambridge Local Plan of 2018, paragraph L.4[15], provides suitable wording relating to reducing existing overprovision of parking.

Section 3.3 of the DCSTDP covers land use planning and makes various recommendations intended for implementation through planning policies. Those that are too detailed for a local plan should be considered for incorporation into the SPD to give them appropriate weight. These include:

15 Cambridge Local Plan 2018, p. 407. https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf

- “maximum distances from developments to bus stops and designated cycle routes must be specified for new developments”
- “spine roads through large developments wide enough for buses”
- “a 'traffic light' assessment of bus accessibility from new developments, with those in the 'amber' or 'red' categories required to fund interventions” (this supports a points-based approach to accessibility assessment as suggested in the Trust's response to question 2)
- “ensuring developer funding for buses is targeted directly at access to new and existing employment developments”
- “parking in developments should be kept to a minimum, especially in central areas of Durham City within reasonable walking and cycling distance of the city centre”
- “all new development should … consider the introduction of a car club”

Responses to specific consultation questions

Question 1

What frequency of public transport services (day time services per hour) should be required for a location to be considered accessible?

A half-hourly service is not sufficient to enable people to avoid waiting an excessive amount of time if public transport is to be reasonably competitive with the private car. Services which are half-hourly during the day drop even lower during evenings and weekends.

By comparison, for car-free developments, Oxford City Council requires proposal sites to be within a 400m walk of a high daytime frequency (every 15 minutes) direct bus route to the city centre, and also have convenient bus access to the nearest District Centre. Oxford, unlike Durham, has limited and expensive city centre car parking. In Durham City, the more plentiful car parking creates an added disincentive for public transport use and reduces viability of bus services. This raises issues of social inclusion, tipping people into transport poverty.

Question 2

Do you agree with the definition of an accessible location proposed by the Council?

The Trust does not agree with the definition proposed by the Council. Most urban locations would be accessible under this definition, and while this would permit a reduced level of car parking provision, which the Trust would support, the methods for coming to a decision on the appropriate level of parking are not stated. By using a definition by which a wide range of locations would be considered accessible, the council may also be unable to obtain developer contributions towards improving accessibility by sustainable modes. In the worst cases, therefore, the developer may be let off the hook for improvements to cycling and walking infrastructure, and also be permitted to provide less than adequate levels of car parking which may result in overspill parking into neighbouring streets.

Accessibility by walking and cycling must also be assessed. Basing accessibility solely on the public transport frequency is not consistent with County Durham Plan Policy 21 and the Inspector's direction that the new SPD should reflect various principles including “having regard to the accessibility of the development by walking, cycling and public transport”. It is also not consistent with NPPF para. 105 which regards accessibility (clause a) as being wider than the availability of public transport (clause c).

The Trust considers that if a site is not judged to be sufficiently accessible, the first resort to remedy this should be to improve accessibility, rather than providing larger quantities of car parking. The SPD should distinguish between a measure of the **potential** accessibility of the site which would justify a reduction in car parking, and the degree of **actual** accessibility which the site should attain in order for the development to be considered sustainable. Developer contributions would then be required towards improvements in order to help realise the potential.

Assessment of accessibility

For larger developments a Transport Statement or Transport Assessment will usually cover accessibility. The Trust's experience is that these documents rarely result in any issues being identified, and that the assessment of accessibility is usually superficial. Most applications simply include 2km and 5km isochrones centred on the site, a textual statement about local cycle routes, a list of bus services, possibly an extract from the County Council's cycle map, and an analysis of recent road accidents. Information on the quality of the pedestrian and cycle routes to the site is usually lacking.

The former County Council's 2001 *Accessibility & Parking Guidelines* included “Annex 2” which set out expectations as to the types of assessment that would be required. The methodology included estimating the population falling within 30-minute catchment areas by each mode, including by car. For cycling and walking an isochrone approach (of 8km or 2km respectively) was to be supplemented with an analysis of major barriers to using these modes, such as lack of footways or crossings, and lack of safe cycling facilities. The 30-minute catchment for public transport included the walking time to and from the bus stops at each end and a 10 minute time penalty for changing buses. The ratio of the catchment population by car compared to each of the sustainable modes was then computed, and developments exceeding a stated threshold would have been required to contribute to off-site works to improve the ratios.

To strengthen the accessibility strand of the SPD, guidance along the same lines as the 2001 document could be included. Alternatively, if the population catchment process is thought to be too onerous, a points-based system could be used. Transport for New Homes has produced a *Checklist for new housing developments*[16] which would allow assessment of housing developments. Wiltshire Council has produced a points-based assessment scheme which can be used to determine the level of reduction in car parking appropriate for destinations. It forms part of the *Wiltshire Local Transport Plan 2011-2026 Car Parking Strategy*[17] which takes an admirably holistic approach to the management of car parking. This scheme has been adapted by Bath and North-East Somerset Council as the basis for their parking strategy[18] and is described on p. 20-21 and Appendix C of that document.

16 https://www.transportfornewhomes.org.uk/wp-content/uploads/2019/10/checklist.pdf
17 https://cms.wiltshire.gov.uk/documents/s14737/
18 Balancing your needs: a parking strategy for Bath & North East Somerset, September 2017. https://www.bathnes.gov.uk/sites/default/files/parking_strategy_technical_report.pdf

Adjustment of parking rates in accessible locations

Whereas the old guidelines tabulated different levels of parking provision for town centres and elsewhere, the proposed SPD has a single level of provision. Paragraph 3.3 says:

> Where developments are located in accessible destinations, fewer parking spaces may be required through planning, to be decided on a case by case basis, taking into account the location and type of development and any other specific circumstances which are relevant. Furthermore, where destinations are situated in accessible locations shorter maximum stays may also be implemented by the car park operator to encourage appropriate turnover.

The proposed SPD provides no detail about the levels of reductions to be sought (or permitted) at the many locations within the built-up area of Durham and the other main towns which would be considered accessible using the proposed definition. The points-based model used by Wiltshire Council, and adapted Bath and North-East Somerset, is worth examining because it gives developers clear accessibility criteria to work to on a range of measures, not just public transport access, and sets a scale of parking space reduction based on the score.

The Inspector was clear in paragraph 107 of his final report that the council should be "limiting the provision of car parking at destinations" to "complement the demand management measures for the city proposed in policy 23 [i.e. 22]". This strongly implies that the SPD should make specific provision for Durham City, which it does not. An unspecific "case by case basis" for decisions may not satisfy the Inspector's direction.

Is the text about shorter maximum stays a hint to developers that they may provide less car parking if they can demonstrate good management of the car park? Perhaps this should be made more explicit, and applied through planning conditions. It would be possible to apply this criterion to locations which are less accessible also, in order to make efficient use of land. There is no mention of the part which might be paid by charging for spaces. The Durham City Sustainable Transport Delivery Plan expresses concern about free parking provision at employment sites.

Cycling and walking accessibility

For cycling and walking access, developers should also be referred to the Local Cycling and Walking Infrastructure Plan (LCWIP), if available. Other source material that could be consulted includes:

- the Council's own audits of existing cycle infrastructure, which have been carried out for Durham City and some other towns, but not published;
- measures identified in the Durham City Sustainable Transport Delivery Plan;
- Neighbourhood Plans and accompanying evidence, such as the *Walking and cycling evidence paper*[19] produced by the Durham City Neighbourhood Plan Working Party;
- crowd-sourced data such as Widen My Path[20] and Street Space County Durham[21] which were gathered during the first Covid-19 lockdown but which are of longer-term value.

19 http://npf.durhamcity.org.uk/wp-content/uploads/2019/05/EvidencePaperWalkingCycling.pdf
20 https://www.widenmypath.com/countydurham/#10/54.6957/-1.8402
21 https://streetspacecountydurham.commonplace.is/comments

To identify barriers to cycling and walking there should be an objective assessment of the main road junctions and links within at least a mile of the site using the audit tools available in LTN 1/20 and the Active Travel Wales guidance (which has been used by the Council and is referred to in the *County Durham Strategic Cycling and Walking Delivery Plan*). The key routes to education, employment and retail destinations (for residential development) or from main residential areas (for other developments), should be assessed. These audit tools are simple to use and quick to apply, so will not be a burden on developers, but will provide useful information highlighting the main issues with the surrounding network.

Question 3

Do you agree with the standards for retail destinations?

The Trust disagrees with these standards.

The Trust has provided comparison with three other authorities in Appendix A below, and notes that the Cambridge parking levels for retail are much more constrained. For general retail also, Bath and North-East Somerset Council allows significantly less parking in the Bath outer zone and none in the city centre unless specially justified. This is despite the fact that the surrounding area has higher car ownership than Durham.

Question 4

Do you agree with the standards for employment destinations?

The Trust disagrees with these standards.

The Trust has provided comparison with three other authorities in Appendix A. The maximum parking standards applied in Bath, Cambridge and Nottingham are all much more constrained. This is important if commuter travel is to be tackled. Commuting tends to occur in short peaks in the morning and evening, and therefore makes inefficient use of transport assets. The Trust notes that the rate of parking provision being proposed in the Issues and Options document has actually been increased by comparison with the Council's 2019 and 2014 standards. There seems to be no justification for this.

For Durham City the standards for employment destinations should be linked to the availability of Park and Ride and some of the on-site provision commuted into additional Park and Ride spaces.

Question 5

Do you agree with the standards for leisure destinations?

The Trust disagrees with these standards and has provided comparison with three other authorities in Appendix A. The maximum parking standards for pubs and restaurants are more constrained in all three cases, and for hotels the provision is significantly lower in two of the authorities studied.

Question 6

Do you agree with the standards for other destinations?

Staff parking provision at schools and colleges seems excessive by comparison with Nottingham and Cambridge (Bath makes no explicit rates available). It may be justified in rural areas, but in towns there should not be a need to provide 1 parking space per member of staff. The Council's 2019 and 2014 standards set a rate of 1 space per 5 members of staff for town centres. There needs to be a more gradual transition in the level of provision depending on the accessibility of the site.

The number of cycle parking spaces at FE colleges, at 1 space per 50 students, is too low considering that this only represents 2% of journeys. Perhaps 1 space per 20 would be a better ratio. The number of spaces at primary and secondary schools is also low considering the effort which is made in promoting active travel to school. Because the school population changes completely every six or seven years, there is much greater scope to change travel behaviours, but it may be best to deal with cycle parking provision at existing schools outside of the planning system. New schools should be well-located and connected to high-quality active travel routes, and be provided with a higher per pupil rate of cycle spaces. The storage also needs to cater for scooters.

Question 7

Do you think that 1 long stay/secure cycle space cycle per 5 members of staff is about right for locations where we work?

The Trust considers that a rate of one cycle parking space per 5 members of staff (20%) is rather too generous given the current rates of cycling to work in the county. People are not going to be attracted to cycle to work just by the provision of secure cycle parking: the provision of safe cycle routes and restrictions on private car routes or parking are much more significant interventions. The SPD should place a lot more emphasis on assessing the standard of the cycle network approaching the site in order to obtain contributions towards off-site improvements.

The BREEAM New Construction scheme, 2018, generally requires a rate of one cycle parking space per ten members of staff. See Table 7.5.[22] The Nottingham policy requires broadly the same level of provision. Cambridge requires more cycle parking, but it does have the highest rates of cycling in the UK.

At the 2011 census two of the Middle Super Output Areas (MSOAs) in County Durham achieved a cycle to work share of 4%. These were both in Newton Aycliffe. In the City of Durham most MSOAs were at the 2% to 3% level. Elsewhere in the Durham County Council area rates were generally at about 1%.

The DfT-funded Propensity to Cycle Tool[23] predicts that if Dutch-style cycle tracks were provided, coupled with wide uptake of e-bikes, the proportion of people cycling to work could rise as high as 25% in the Framwellgate Moor and Gilesgate MSOAs and to around 20% in most other MSOAs around the city. So a rate of provision of one cycle parking space per 5 members of staff would be appropriate if the Council can deliver comprehensive high-quality cycle infrastructure.

Perhaps it would be better to align with the BREEAM cycle parking rates for new non-residential developments, but ensure that there is a commitment in Travel Plans to increasing the amount of cycle parking if surveys find that use is nearing capacity.

Note that the BREEAM scheme includes adjustments to the cycle parking rates for rural locations, and the Council may wish to consider using these.

22 https://www.breeam.com/NC2018/#07_transport/tra02_a.htm#Cycle
23 https://www.pct.bike/m/?r=north-east

For sites in rural locations:

1. Where the distance to the nearest urban location is greater than 10 miles, the number of compliant cycle spaces can be reduced by 50%.

2. Where the distance to the nearest urban location is greater than 20 miles, the number of compliant cycle spaces can be reduced by 70%.

3. Where the distance to the nearest urban location is greater than 30 miles, the number of compliant cycle spaces can be reduced by 90%.

Obviously the nearest urban location might be outside the Durham County Council area. There is also an option for reducing cycle parking provision if the public transport accessibility index is high, but the rural reduction should not be used in combination with this.

In town centres the cycle parking requirement for employees and for visitors could be commuted into a contribution towards public cycle parking provision if on-site provision is difficult. This would be preferable to having cycle parking which is inconvenient for users.

There is no requirement for visitor cycle parking shown for various types of development where it would be useful, including particularly office developments and business parks. There should be some visitor cycle parking close to building entrances.

Question 8

Should all retail destinations have short stay cycle parking for visitors?

Yes, the Trust supports the provision of short-stay cycle parking for visitors, but notes that the SPD omits various types of retail (bulky goods, DIY, builders merchants and garden centres) from this requirement (see paragraph 3.4). The Trust disagrees with this approach, and suggests that a minimum of four short-stay spaces for visitors should be provided. People may wish to visit such retail outlets by bicycle and have goods delivered by van. Most retail outlets in these categories also sell smaller items that can be carried home by bicycle, and with a trailer and an e-bike, bulkier items can also be transported.

Cycle parking should also be available for customers of restaurants and cafes, not just staff. There should also be cycle parking provided within a suitable distance of hot food takeaways: it is not clear why car parking for customers is required but cycle parking is not. The Trust is not supportive of drive-through takeway food and drink facilities, which do not enhance towns visually or socially, but if such facilities are granted planning permission, there should be conditions to require the operators to encourage access on foot and by cycling as well.

The Issues and Options document does not adequately stipulate the design of cycle parking at non-residential locations. The *Cambridge Local Plan 2018* paragraphs L.16 to L.27[24] would be worth emulating.

In order to promote cycling and to ensure surveillance of the cycle parking area, it should generally be located closer to the main entrances of the destination buildings than non-disabled car parking spaces. This should be stated in the SPD.

24 Cambridge Local Plan 2018, p. 416-423. https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf

Question 9

Should 15% of all long stay parking spaces be set aside for electric vehicle parking at retail, employment, leisure and other destinations?

This does not seem an unreasonable level of provision to aim for, but there should surely be some distinction between locations where a car is likely to be parked for the whole day, such as an employment site, and locations where cars might only be parked for an hour. Rapid charging might be appropriate at supermarkets, say, whereas slower chargers would be fine at an office building. The type of charger has an impact on the cabling required. If passive provision is being made, the SPD should ensure that the correct type of cabling is laid to enable appropriate charger types to be installed.

Question 10

Are the minimum parking allocations for 1-2 bed, 3 bed, 4 bed and 5 bed appropriate for residential development?

The Trust does not agree that minimum residential parking standards are appropriate throughout the whole Durham County Council area. As the Trust has represented in the introduction, there should be maximum rates of residential car parking where a greater density of development can be sustained, including sites which are highly accessible.

The minimum standards proposed by the Council are also not a good fit with what would be required to accommodate the levels of car ownership across the County. At the 2011 census there were 1.11 cars per household in the County Durham local authority area, but 27% of households in County Durham had no car. The National Travel Survey shows that between 2011 and 2019 there has been no increase in the rate of car ownership per household in the North-East. Requiring all properties to be built with parking in-curtilage is unnecessary. These parking spaces will become a frozen asset if reductions in car usage, which are an imperative, are achieved.

Town centre locations

The 2019 *Parking and Accessibility Standards* listed eleven accessible town centres in Table 5 (p. 20) and disapplied the minimum parking levels for residential developments if a site was within 800m of the bus station. In fact the standards applied a maximum rate of 1 parking space per dwelling in these circumstances.

The 2017 Durham City Neighbourhood Plan Consultation Draft[25] policy T3 encouraged reduced car parking provision subject to seven conditions which were based on the successful Oxford City policy. The County Council's response criticised the policy for being overly prescriptive, while indicating that the authority wanted to make it easier for developers to reduce parking provision within the CPZ:

> It over-complicates the issue of providing less parking in the CPZ. If anything, to accord with strategic direction of travel this policy should have the intention of making it easier for developers wanting to provide less parking in the CPZ. In practice, the county council will be seeking developments to provide no more than 1 space per unit in the CPZ as it would

25 https://www.durham.gov.uk/media/22919/Durham-City-Neighbourhood-Plan/pdf/DurhamCityNeighbourhoodPlan.pdf?m=636735568032070000

> class the CPZ as an accessible town centre location. … Making it more onerous for developers to provide for less parking does not appear to be the logical approach.

By contrast the Issues and Options document does not indicate that there might be a reduction in the minimum parking standards for residential properties in any circumstances. Para. 3.3 allows for fewer parking spaces at accessible destinations, but Section 4 on Residential Parking Standards does not include any equivalent text. The Trust would like to see the SPD allow for, and encourage, reduced car parking provision within the Durham CPZ, as controlled parking is the single most important factor in the success of limiting parking at origin. (The 800m radius of the bus station, as used in the 2019 standards, did not adequately reflect the geography of Durham city centre.)

Appendix B demonstrates the efficacy of constraining residential car parking in accessible locations by means of a study of census data for part of Durham City.

If the requirements in the Issues and Options document are carried unmodified into the SPD, there will be an adverse effect in Durham city on the viability of ordinary residential development. There would be no requirement for car parking within the CPZ for student accommodation, but non-student accommodation would be subject to the county-wide minimum parking standards, making it unviable in comparison. This could exacerbate the imbalance in the city's residential streets and work against the Council's other Plan policies.

Allocations based on number of bedrooms

The Trust is convinced that the application of minimum parking standards to residential developments across the county will not make best use of land.

Para. 106 of NPPF allows for “optimising the density of development in city and town centres and other locations that are well served by public transport” as one of the reasons to justify applying maximum parking standards. The Council's proposed approach of primarily in-curtilage provision for residential properties is not likely to optimise the density of development. As demonstrated in Appendix B, a proportion of spaces will remain unused, and in accessible locations this will either be quite high, or will lead to greater car ownership.

The requirements on how the spaces are to be provided should be more flexible and promote a variety of provision so that people can more easily find a house that suits their needs. In larger developments there should be a proportion of houses and flats with no in-curtilage car parking, but there also needs to be an appropriate (but not excessive) supply of unallocated parking spaces that increase the flexibility of the provision and help to optimise the density of development.

The Trust is very supportive of the idea that non-allocated parking spaces should be designed into the layout of the overall site. It is important that carriageway widths are considered carefully to avoid people parking on pavements.

Comparison of rates applied in other cities

Both Cambridge and Nottingham continue to apply maximum rates of provision to residential properties throughout their urban areas, not just in the city centre or within a CPZ. Their policies were put in place after the 2018 revision of NPPF and therefore include justification of the need to apply maxima.

Nottingham applies a maximum of 1 parking space per dwelling in the city centre and 1.5 spaces per dwelling elsewhere.[26]

Cambridge applies a maximum of 1 parking space per dwelling within the CPZ, and a maximum of between 0.5 and 2 spaces per dwelling elsewhere. The Cambridge approach appears to acknowledge the need to be flexible and allow for reduced provision where the developer can demonstrate it is appropriate, as well as encouraging a variety of levels of provision within a development. Paragraph L.7[27] states that "parking should be a mixture, with some parking allocated (to specific dwellings) and some parking provided as unallocated – particularly visitor parking and any parking above one space per dwelling" and refers to Manual for Streets for design advice.

This is consistent with the approach advocated by the Trust both in the reply to this question and in the section on "Innovative layouts" elsewhere in the response.

Question 11

Should garages be excluded from counting towards the parking requirement for residences?

Paragraph 4.5 seems to present a circular argument. The first sentence says that garages might be too small to accommodate a car, and therefore should not be counted as parking spaces. The final sentence says that as garages will not be counted as parking spaces there is no need to specify a minimum size.

It is fair enough that existing garages might be too small for modern cars, and therefore should not be counted as parking spaces when assessing the existing level of provision in a property which is being extended or converted, for example. But rather than require a householder to convert a front garden to an additional driveway to provide the required level of parking (in compliance with para. 4.4), the garage should be counted as a parking space if it is genuinely big enough and used for that purpose.

If a garage has a motorised door that can be operated from the vehicle, it is much more likely to be used for car storage. Also if a dwelling is only slightly set back from the edge of the highway and has no driveway but incorporates a garage, that should also be counted as a parking space. This might occur in some infill developments.

As few cars are kept in garages, perhaps developers should be encouraged not to provide garages, and instead use the space saved for well-designed cycle storage and additional living space. There has been an increased need for home-working space during the pandemic. The Council should consider whether greenhouse gas emissions could be reduced more quickly if new housing developments facilitate home-working.

Notwithstanding the fact that few people bother putting cars into garages, the Trust would like to see a minimum garage size set in the SPD so that where houses are built with garages, they are actually usable as such. The Cambridge City Council *Cycle Parking Guide for New Residential Developments* (p. 27-29, see reference in question 15 below) gives garage dimensions and layouts that can accommodate a car and suitable cycle storage. The minimum dimensions are 3.3m by 6m for the car storage, with additional depth of 1m or additional width for part of the length of the

26 Nottingham City land and planning policies: development plan document: local plan part 2, p. 289 https://documents.nottinghamcity.gov.uk/download/7574

27 Cambridge Local Plan 2018, p. 408. https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf

garage, to accommodate cycles. For comparison the minimum garage size required in the 2019 *County Durham Parking and Accessibility Standards* was 3m by 6m only.

Requiring garages, where provided, to be a suitable size for car and cycle storage might force developers to consider what the point of a garage is, and encourage house designs that better suit modern storage and home-working needs.

Question 12

Does one well designed visitor/non-allocated space per 4 dwellings provide the right flexibility for visitors and households with excess vehicles?

This level of provision seems appropriate if parking for residents is to be provided primarily through allocated spaces, but as stated elsewhere the Trust would like to see the SPD approving more innovative design solutions to allow developers to vary what proportion of the car parking is privately allocated, and a lower proportion of allocated spaces would make more efficient use of land as explained in the answer to question 10.

Question 13

Should loose permeable materials be permitted for use as a driveway surfacing material?

No, for the reasons given in the consultation document.

Question 14

Should driveways be a minimum width of 2.7m and should that apply to the driveway's entire length?

The width requirement for driveways rather depends on how far the council wishes to accommodate the trend towards larger vehicles which is unfortunately contributing to increased emissions. Larger SUVs may be 2m wide. With such a vehicle, a driveway of 2.7m width would not leave sufficient space to be usable by anyone needing a wheelchair.

If a house is to be provided with two parking spaces within the curtilage of the property, there should be a preference for these to be side by side, rather than one behind the other on a long driveway. People are more likely to take up on-street parking spaces if they cannot conveniently access their preferred car when setting out. The previous version of the standards also stipulated a minimum width for double driveways, and this should be retained to ensure provision is adequate.

If there is a garage, then the driveway must be long enough to enable users to open the garage door and get bicycles out of it while there is a car parked in the drive. The drive also needs to be wide enough to facilitate this.

An extra width requirement should be added if there is a vertical feature such as a wall on either side of the driveway, as this will limit how close to the edge the driver will be able to park, and how much width will remain for cycle access, wheelchairs, etc.

In order to access driveways, dropped kerbs are usually provided so that cars can cross the pedestrian footway. Practice in Durham before around 1980 was to keep the footway level (at a consistent crossfall) and to provide sloping kerbs with a gradient of about 1:5 to allow cars to gain

access. The change in practice can be seen on Archery Rise, where the first phase of development has such kerbs, and the second uses dropped kerbs with the footway sloping down to the carriageway.

The current approach disadvantages people using wheelchairs and pushing buggies, and makes conditions worse for all pedestrians in snow and ice. Current Dutch practice prioritises the pedestrians, as can be seen in these two images courtesy of David Arditti[28]:

The Trust would like to see pedestrian access prioritised again in Durham street design, and it may be appropriate to include this as guidance in the SPD.

Question 15

Should developers provide secure parking suitable for a cycle, mobility scooter or motorbikes where a property is not built with a garage? If so, are you happy with the proposed dimensions?

Yes, secure parking suitable for these personal transport modes should be provided. The secure space should include electrical power suitable for charging e-bikes, mobility scooters and other battery-powered personal transport. This requirement has been included in the Durham City Neighbourhood Plan policy T3 but it should be extended county-wide.

Access to the storage should be from the front of the property, unless there is a good quality cycle route more conveniently accessed from the back. If the house has a driveway, it must still be possible to access the storage conveniently when there is a car parked in the drive. If access to the cycle storage is inconvenient, people may be more inclined to use the car for journeys that could have easily been cycled.

It would be good to enhance the level of detail on design in the SPD, basing the requirements for cycle parking on the Cambridge Local Plan 2018 appendix L which covers a number of important design aspects. Rather than attempt to provide comprehensive design guidance for cycle parking, the SPD could require that proposals have regard to the *Cycle Parking Guide for New Residential Developments*[29] (Transport Initiatives LLP and Cambridge City Council, 2010) which is a very

28 https://twitter.com/VoleOSpeed/status/1199342886292058113?s=20
29 https://www.cambridge.gov.uk/media/6771/cycle-parking-guide-for-new-residential-developments.pdf

thorough guide containing good illustrations and photographs and a wide range of solutions to suit different contexts. (It does need adjustment regarding the dimensions of dedicated enclosures for cycle storage however.)

The proposed dimensions of 2m by 2m in the Issues and Options document are too constrained. The Cambridge guide cited above shows a space of 2.2m by 2m as the minimum required to accommodate 3 cycles, but this is assuming that all of the cycles are ordinary ones. Figure 5.2 on p. 41 of *Cycle Infrastructure Design* (Local Transport Note 1/20, DfT, July 2020) shows the dimensions of a number of types of adapted or non-standard cycle. To accommodate a wider variety of types of cycle, a space 2.7m by 2m would be beneficial. Householders will be able to find use for any space which they are not using to store cycles, so it will not be wasted. Larger adapted cycles are more costly to replace, so it is vital that users have secure storage available. It is not sufficient that developers provide space at only a proportion of properties, as disabilities can be temporary and it is often not feasible for people to move house.

If houses without garages do not have adequate space to store larger adapted cycles, then the council's policy will have an impact on people with reduced mobility and other minority groups, and this will need to be stated in the Equality Impact Assessment of the policy. Disabled people should not be discouraged from taking up healthy and environmentally-friendly active travel options by poor design of dwellings.

Just as para. 4.4 of the Issues and Options document is concerned with maintaining an appropriate car parking provision as houses are adapted or extended, there too should be safeguards to ensure that the secure parking area provided for cycles and mobility scooters remains usable for that purpose by future occupiers, and is not converted into other accommodation in a way which would make it unsuitable for use as storage without further building work. If a garage or other storage space is converted into a living space or bedroom, then the applicant should be required to construct a suitable secure store in compliance with the SPD.

The Trust objects to the fact that cycle parking at student accommodation seems to have been omitted from the Issues and Options document. The 2019 standards required a minimum of 2 long stay cycle parking spaces per 5 bedrooms and 1 visitor space per 10 bedrooms at residential blocks of flats or student accommodation, and the same rate of long-stay cycle parking at HMOs without garages. This level of provision is in line with the rates of cycle ownership nationally and accords with BREEAM standards, and the Trust asks that this requirement be retained.

The Durham City Neighbourhood Plan policy T3 (b) deals with the ongoing management of communal storage facilities, and a similar wording could be incorporated into the SPD:

> Where there is communal storage provision for a number of dwellings and a travel plan is required then this should consider ongoing active management of communal storage spaces, including timely removal of abandoned equipment, and provision of additional capacity when needed.

The Trust would like to see a policy on the use of double-deck and hanging storage spaces, which can be harder or impossible to use for people with insufficient upper body strength. Where such spaces are used to increase the density of storage, for example in larger accommodation blocks, there should always be a certain amount of ground-level storage in the form of ordinary stands to allow for storage of non-standard cycles and for use by people who cannot manage to lift their

cycles into off-ground storage. The *Guide to Inclusive Cycling*[30] (Wheels for Wellbeing, 4th ed., 2020) p. 54-61 covers the needs of cycle parking for disabled people.

Question 16

Should the appropriate enabling electrical cabling for a double-socket EV chargepoint be provided on all new residential properties?

Yes, absolutely. The Trust would like to see further critera relating to the design of chargepoints, because infill development may require different solutions. The Durham City Neighbourhood Plan policy T2 says that electric vehicle charging facilities should not hinder the movement of pedestrians or disabled people, and should respect the character of the area. Similar wording in the SPD would extend this consideration to the whole county.

While this is not directly relevant to the question, the Council should also consider if policies on EV charging on the highway need to be developed further. The Trust considers that in general chargepoints should not take space away from pedestrian footways. Before any chargepoints are installed on a street, there must be an assessment of the existing and potential cycle network requirements in the area. Passive cabling or chargepoints should not be installed in any part of the carriageway which may be required in the future for protected cycle tracks or for footway widening. It is unlikely that it would be appropriate to install permanent public chargepoints on arterial routes, even where these currently have residential parking. The council should refer to any Local Cycling and Walking Infrastructure Plan and also consult with stakeholders including local cycling and walking groups.

30 https://wheelsforwellbeing.org.uk/wp-content/uploads/2020/12/FC_WfW-Inclusive-Guide_FINAL_V03.pdf

Appendix A: Rates of provision

This section supports the Trust's responses to questions 3 to 6 and 10.

The Issues and Options document does not provide any background on the decisions behind the parking rates selected. In order to address the questions the Trust has sought to make comparison with the policies of other authorities.

It is quite hard to find suitable comparators online, because many local authorities are still operating with parking standards that have not been revised since the withdrawal of PPG 13 by the coalition government, but the Trust has studied three in particular which have content which could be applied to Durham.

- Nottingham[31] is a large city with good public transport and a workplace parking levy. It exhibits many examples of good practice in encouraging sustainable transport.
- Cambridge[32] is a historic university city with about twice the population of Durham.
- Bath[33] is a small university city with a World Heritage Site within commuting distance of the major city of Bristol, so is in a similar situation to Durham and the conurbations of Tyne and Wear. It has a Park and Ride scheme.

Neither Nottingham nor Cambridge covers rural areas, and so the comparisons to be drawn are most applicable to Durham City and other major towns. Bath is a good match for Durham City in many ways, and like County Durham the local authority area for Bath and North-East Somerset is largely rural, but the car ownership at the 2011 census was higher, at 1.26 cars per household, as opposed to 1.11 in County Durham.

Bath and North-East Somerset Council defines a central zone in Bath in which no non-residential parking is allowed unless justified and residential parking is at the rate of 0.5 spaces per dwelling, justified by 2011 census data. The outer zone of the city of Bath has maximum standards applied for non-residential development, and minimum standards for residential development which at first sight appear to be higher than those proposed by Durham, but are actually about the same because garage space is included. Beyond the city no parking standards are applied in the case of non-residential development and each case is assessed on merit.

The table below highlights the main categories where there appears to be a significant disparity in parking rates. Green cells show where another authority allows significantly less parking than Durham, and red cells indicate where more parking is permitted than in Durham.

In many cases the Nottingham policy does not set a rate but advises developers to discuss with the Planning/Highway Authority. The framing of the planning policy and the supporting evidence suggest that Nottingham would take a robust attitude to parking levels.

Particularly noteworthy are the maximum rates applied to dwellings in Cambridge, and the way that the parking levels are tied to whether a site is within the CPZ. The other categories where there is significant difference include offices, light industrial uses and hospitality, where Cambridge and

31 Nottingham City land and planning policies: development plan document: local plan part 2 (Nottingham City Council, January 2020) Appendix 1, p. 284-293 https://documents.nottinghamcity.gov.uk/download/7574

32 Cambridge Local Plan 2018. https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf

33 Balancing your needs: a parking strategy for Bath & North East Somerset, September 2017. See Appendix B for parking rates. https://www.bathnes.gov.uk/sites/default/files/parking_strategy_technical_report.pdf

Bath provide much less parking. Cambridge also provides less parking for retail. The Durham policy for schools appears to be to encourage all members of staff to drive, whereas Cambridge expects at least a third not to. The Cambridge rates for residential care homes are a lot lower as well.

One significant difference is with student accommodation, where Cambridge appears to require significantly more parking. The wording of the policy suggests this may relate to student accommodation also being used for conferences, which is a big source of income for Cambridge colleges. It may also be partly a pragmatic response to a rising car ownership among students. Bath, on the other hand, provides no parking.

Land Use	Proposed County Durham SPD	Bath (outer zone maxima only)	Cambridge	Nottingham (all maxima)
General retail	1 per 25m^2 GFA	1 per 100m^2 GFA initially, then 1 per 20m^2 GFA over 500m^2	Disabled only in CPZ. 1 per 50m^2 GFA elsewhere	1 per 25m^2 GFA in city centre; 1 per 20m^2 GFA elsewhere
Supermarkets (below 1000m^2)	1 per 12.5m^2 GFA	1 per 14m^2 GFA	Disabled only in CPZ. 1 per 50m^2 GFA elsewhere	1 per 25m^2 GFA in city centre, otherwise discuss.
Supermarkets (above 1000m^2)	1 per 20m^2 GFA	1 per 14m^2 GFA	Disabled only in CPZ. Elsewhere 1 per 50m^2 GFA then 1 per 18m^2 for area in excess of 1400m^2.	1 per 25m^2 GFA in city centre; 1 per 14m^2 GFA outside city centre
Bulky goods, DIY, cash and carry	1 per 25m^2 GFA	1 per 14m^2 GFA	Unclear which would apply	Unclear which would apply
Retail parks	1 per 20m^2 GFA	1 per 14m^2 GFA	Disabled only in CPZ. 1 per 50m^2 GFA elsewhere	1 per 20m^2 GFA outside city centre; 1 per 25m^2 GFA within
Builders merchants	1 per 100m^2 GFA	Unclear which would apply	Unclear which would apply	1 per 450m^2 GFA in city centre; otherwise discuss
Garden centres	2 per 25m^2 GFA	Not specified	Not specified	Not specified
Car sales	1 per 25m^2 GFA	Not specified	Not specified	Not specified
Petrol stations with retail	3 per 100m^2 GFA	Not specified	Not specified	Not specified
Offices and business parks	1 per 18m^2 GFA	1 per 100m^2 GFA	In CPZ: 1 per 100m^2 GFA; Outside CPZ: 1 per 40m^2 GFA	1 per 100m^2 GFA city centre; 1 per 40m^2 GFA elsewhere

Land Use	Proposed County Durham SPD	Bath (outer zone maxima only)	Cambridge	Nottingham (all maxima)
Light industrial	1 per 50m^2 GFA	1 per 100m^2 GFA	In CPZ: 1 per 100m^2 GFA; Outside CPZ: 1 per 40m^2 GFA	1 per 215m^2 GFA city centre; 1 per 85m^2 GFA elsewhere
Warehousing and distribution	1 per 100m^2 GFA	1 per 50m^2 GFA up to 235m^2, then 1 per 250m^2.	In CPZ: 1 per 300m^2 GFA; Outside CPZ: 1 per 100m^2 GFA	1 per 450m^2 GFA city centre; 1 per 215m^2 GFA elsewhere
Garage repair/servicing	1 per member of staff and 1 per 25m^2 GFA	Not specified	Not specified	Not specified
Hotels, guest houses	1 per bedroom	1 per 3 bedrooms	In CPZ: 1 per 10 residents, 1 per 2 staff Outside CPZ: 1 per 8 residents, 1 per 2 staff	1 per bedroom
Pub / Restaurant / Cafe	1 per 8m^2 public space	1 per 100m^2 GFA initially, then 1 per 20m^2 GFA over 500m^2	In CPZ: 1 space per resident proprietor; Outside CPZ: 1 per 20m^2 public space.	1 per 25m^2 GFA in city centre, otherwise discuss
Hot food takeaway	1 per 2 members of staff and 1 per 25m^2 GFA	As for restaurants	As for restaurants.	1 per 25m^2 GFA in city centre, otherwise discuss
Fitness clubs and sports facilities	1 per 25m^2 GFA	Not specified	In CPZ: 1 per 3 staff + disabled parking. Outside CPZ: 2 per 3 staff + 1 per 4 seats.	1 per 22m^2 GFA outside city centre; otherwise discuss
Places of worship	1 per 150m^2 GFA	Not specified	In CPZ: 1 per 100m^2 GFA; otherwise 1 per 8 seats	Discuss with authority
Cinemas/theatres	1 per 3 members of staff and 1 per 12.5m^2 public space	Not specified	In CPZ: disabled parking, and 1 per 2 staff; Outside CPZ: 1 per 4 seats.	1 space per 5 seats outside city centre
Caravan and camp sites	1 per pitch and 1 per 2 members of	Not specified	Not specified	Not specified

Land Use	Proposed County Durham SPD	Bath (outer zone maxima only)	Cambridge	Nottingham (all maxima)
	staff and 1 visitor space per 10 pitches			
Hospitals	2 per 33m^2 public space and 1 per 10 members of staff	1 per 4 staff + 1 per 3 visitors	On merit	Not specified
Doctors, dentists etc.	1 per treatment room and 1 per 2 members of staff	Not specified	1 per treatment room and 1 per 2 members of staff	Discuss with authority
Residential care homes	1 per 3 beds	1 per 2 staff + 1 per 6 beds	In CPZ: 1 per 10 residents, 1 per 2 staff. Outside CPZ rising to 1 per 8 residents.	Discuss with authority
FE colleges	1 per member of staff and 1 visitor space per 50 pupils	Not specified	In CPZ: 1 per 4 staff; Outside: 2 per 3 staff.	Outside city centre, 1 per 2 members of staff + 1 space per 15 students; otherwise discuss with authority
Schools and nurseries	1 per member of teaching staff and 1 visitor space per 50 pupils	Not specified	In CPZ: 1 per 3 staff; Outside: 2 per 3 staff.	Discuss with authority
Community centres	1 per 16m^2 public space and 1 per 2 members of staff	Not specified	In CPZ: 1 per 100m^2 GFA; otherwise 1 per 20m^2 public space	Not specified
1-2 bed dwelling	1 per dwelling min.	1 per dwelling min.	1 per dwelling max. in CPZ; outside CPZ a mean of 1.5 per dwelling max.	1 per dwelling city centre; 1.5 per dwelling elsewhere
3 bed	1 per dwelling min.	2 per dwelling min. including garage space	1 per dwelling max. in CPZ; outside CPZ a mean of 0.5 to 2 per dwelling	1 per dwelling city centre; 1.5 per dwelling elsewhere
4 bed	2 per dwelling min.	3 per dwelling min. including garage space	1 per dwelling max. in CPZ; outside CPZ a mean of 0.5 to 2	1 per dwelling city centre; 1.5 per dwelling elsewhere

Land Use	Proposed County Durham SPD	Bath (outer zone maxima only)	Cambridge	Nottingham (all maxima)
			per dwelling	
5 bed	2 per dwelling min.	3 per dwelling min. including garage space	1 per dwelling max. in CPZ; outside CPZ a mean of 0.5 to 2 per dwelling	1 per dwelling city centre; 1.5 per dwelling elsewhere
PBSAs	1 per 15 students outside CPZ; otherwise no requirement	Zero provision	1 per 10 bedspaces where parking controls exist, otherwise 1 per 5.	Discuss with authority

Appendix B

To study the effect of residential car parking constraint on car ownership, and the patterns of ownership in relation to house size, we have examined the number of houses and car/van ownership in two different parts of Durham City, using the 2011 census figures. Although the census was 10 years ago, the conclusions are still valid as they are based on how sites compare.

The Western Hill area was first developed in the 19th century, but the census output area also includes 1930s housing on Fieldhouse Lane and post-war housing on Larches Road and off Back Western Hill. It is close to the railway station and the bus station so would score highly in terms of accessibility, though the steep hill on Albert Street can be an issue.

The Downs and housing on the north side of Potters Bank were mostly constructed since the 1990s. Most of the houses are detached and some of the properties are quite large. The area is well-located with respect to the major road network. A few bus services use the A167.

Western Hill (E00105049)

The Downs / Potters Bank (E00171953)

Using the census figures for the number of bedrooms in the dwellings in each output area, we can calculate the parking spaces that would have been required if the housing had been built with the proposed minimum parking standards in place. The rows shaded in yellow are the figures from the census, expressed as percentages of the total number of dwellings. We have grouped the 1-3 bedroom properties together, as the Council's model allocates them one parking space each. The larger houses are grouped and assigned two spaces each.

The subsequent rows are calculated according to the Council's model. They do not represent the actual parking spaces available, but rather what would be required by the proposed policy if such a mix of housing was being built now. The unallocated car parking row represents the requirement for 1 on-street parking space per four properties in the Issues and Options document's Table 5. Again they are expressed as percentages of the total number of dwellings, so a parking availability of 179.7% means there are just under 1.8 car parking spaces per dwelling.

Although Western Hill has a slightly higher percentage of smaller properties, the total parking availability does not differ significantly between the two areas. The Council's policy would have generated roughly 1.8 car parking spaces per dwelling in both cases.

Bedrooms	Western Hill (E00105049)		The Downs / Potters Bank (E00171953)	
1	7.2%	45.3%	2.2%	40.2%
2	7.9%		13.4%	
3	30.2%		24.6%	
4	30.2%	54.7%	32.8%	59.7%
5+	24.5%		26.9%	
Allocated car parking availability		154.7%		159.6%
Unallocated car parking		25%		25%
Total parking availability		179.7%		184.6%

Next we look at the actual numbers of cars and vans recorded in the 2011 census. The most important figure is the “Total car/van availability” which includes the cars in excess of 4 per household which are not broken down in the available census data. The proportions of houses with 0 or 1 cars are also important, because they affect whether allocated in-curtilage parking spaces will actually be used.

The Downs / Potters Bank area had an average of 1.8 cars per dwelling, whereas the Western Hill output area had just under 1.3.

Cars or vans	Western Hill (E00105049)	The Downs / Potters Bank (E00171953)
0	20.1%	7.5%
1	41.0%	32.8%
2	30.2%	41.8%
3	8.6%	9.7%
4+	0%	8.2%
Total car/van availability	127.3%	180.6%

Ownership rates

There are two main reasons why Western Hill has lower car ownership than The Downs and Potters Bank. Firstly the location, despite the hill, is much more convenient for access to amenities and to public transport, and secondly the car parking is much more constrained: the in-curtilage car parking is nowhere near the levels produced by the model in the Council's Issues and Options document. Some properties on Albert Street have garages on Back Western Hill, but most parking is on one side of the street. Fieldhouse Lane and Larches Road has some off-street car parking. Albert Street is within CPZ Zone M, but although the Fieldhouse Lane properties are now within CPZ zone NE, at the time of the last census the on-street parking was uncontrolled.

The housing in The Downs and Potters Bank, by contrast, generally has the levels of car parking that are proposed in the Council's model.

If the Western Hill development had been built to the minimum parking standards proposed in the document, it is very likely that the car ownership would now be higher, and that car usage would also be higher. There would be no advantages arising from this.

This demonstrates the desirability of restricting car parking in accessible residential areas, especially where on-street parking is controlled.

Efficiency of land use

The figures initially suggest that, with the use of the unallocated on-street parking, The Downs / Potters Bank would have just enough parking availability if they had been built under the proposed minimum parking standards, because the car/van availability of 180.6% is slightly less than the parking availability of 184.6%. But note that 7.5% of the households actually do not have a car: as each of these houses would have at least one parking space in-curtilage, the actual parking availability drops to 177.1%, slightly less than the number of cars required to be parked.

Now we compare the hypothetical allocations of car parking spaces for Western Hill. Firstly, 20.1% of the houses do not have cars. If we take the best-case scenario and assume that these are all smaller properties with one parking space, that means 25.2% of the houses have up to three bedrooms and one car. That leaves another 15.8% of houses with only one car, but as these are larger than 3 bedrooms they would have had two driveway spaces available using the Council's model. Altogether, of the 154.7% private parking availability, 35.9% would be unused private driveway space, leaving 118.8% private parking availability to accommodate the 127.3% car/van parking demand.

	Western Hill (E00105049)	The Downs / Potters Bank (E00171953)
Unused allocated spaces per household	36%	7.5%
Unused allocated spaces as percentage of total allocated spaces	23%	5%
Cars requiring parking in unallocated spaces (per household)	8.5%	28.5%

The important things to note, in both areas studied, are:

- the on-street spaces are necessary in order to accommodate the needs of households owning large numbers of vehicles;
- there would be wasted space in-curtilage which would not be used to store vehicles.

In the accessible location with slightly smaller properties and lower car ownership there would be much more unused private driveway space, with about a quarter of it being empty. This suggests that in accessible locations a much higher proportion of car parking should not be allocated in a fixed way to individual properties, and there should be some proportion of properties without any allocation. Whether the parking is provided on-street, or via private spaces rented by or conveyed to the householders, could be decided case by case.

The car ownership levels of The Downs / Potters Bank exceed the provision of spaces that would be required as a minimum in the Council's model, but it is worth remembering that these developments

include some of the most prestigious properties in Durham. It does emphasise, however, that when the green belt release land is developed for housing, the developers will have to work very hard to avoid high levels of car use, and the sustainable transport connections to the neighbouring amenities and to the city centre will have to be exemplary in quality.