

6 June 2022

Parking and Accessibility SPD Consultation 2022

Question 1

Do you agree that there should be more flexibility regarding the amount of car parking required in an accessible location?

As acknowledged in paragraph 1.9 of the consultation document, the County Plan Inspector considered that maximum parking standards at destinations should be implemented in accessible locations. Despite this, the proposed SPD applies standards equally across the county, and under each table it is stated that the standards are neither maximum nor minimum standards. If the standards are to be “applied as stated”, to quote the Council’s response to Highways England’s consultation response, then the SPD does not meet the Inspector’s requirement that maximum parking standards should **be applied to accessible destinations**.

The Council has instead devised standards that apply across the county, even in the most inaccessible locations, and are intended to be “sufficient to provide for the needs of the development” (para. 3.1). It proposes that accessible locations will be considered case by case, which implies that no specific policy will apply in such locations. The Trust’s view is that the possibility of “flexibility” in accessible locations does not go far enough: the standards should **require** a lower rate of car parking provision in accessible locations. As noted by Highways England in their submission to the previous consultation, over-provision of car parking can make car-based trips more attractive. All previous Durham County Council Parking and Accessibility Standards over the last two decades have included explicit lower levels of provision to be applied in town centres. Why, when expressly directed by the Planning Inspector to set maximum parking standards at accessible destinations, has the proposed SPD abandoned this approach in favour of a case-by-case analysis?

The Trust would like to understand how the case-by-case guidance will be delivered. If it forms part of pre-application advice for applicants, will the guidance and evidence also be published by the County Council when an application is submitted? If it is to be based on TRICS data, will the surveys selected include those from comparable sites across the country, rather than being restricted to Durham examples? Will the rate of provision be designed to further the aims of any Travel Plan and the need to decarbonise transport through modal shift?

Question 2

Should the cycle parking requirement be based on floor area of the development?

The revised SPD departs from previous standards by using floor area, instead of numbers of staff or users, for some of the cycle parking requirement rates. These have been taken from the tables in LTN 1/20 section 11.3 which are intended “in the absence of any local guidance or standards”. LTN 1/20 paragraph 11.3.3 advises that data gathered for Local Cycling and Walking Infrastructure Plans may help in predicting potential growth in cycling and enable a more considered approach. The Trust notes that the County Council has adopted three LCWIPs and is drawing up nine more.

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While the Trust is not unhappy for floor area to be used to indicate rates, it suggests that these should always be cross-checked against trip generation evidence, any Travel Plan targets, and any evidence of unsatisfied need in the vicinity of a proposed development.

Question 3

Do you agree that faster charging speeds should be encouraged at car parks with high turnover such as supermarkets?

The Trust made this suggestion in response to the *Issues and Options* consultation and welcomes the adoption of this idea in the revised SPD.

Question 4

Should 10% of disabled bays be provided with EV chargepoints?

The SPD requires 5% of parking spaces to be provided with active EV chargepoints. A further 20% of spaces are to have passive provision (cabling) for future upgrading. The proportion of disabled spaces is also to be 5%.

The proportions given in the policy would thus result in one disabled bay with EV chargepoint per 200 car parking spaces. However the note in paragraph 3.18 that the requirement would only apply where 10 or more EV chargepoints are installed effectively means there will be no disabled EV charging bays in car parks with fewer than 200 spaces. It is hard to see how this has not been recognised as an issue in the Equalities Impact Assessment. The low proportions could make it very difficult for disabled users who switch to an electric vehicle to find a suitable chargepoint. Perhaps it would be appropriate to require 25% of disabled parking bays to be provided with chargepoints, rounded up to an absolute minimum of one. This proportion would be in line with the passive provision requirements, but making the disabled parking bays active from the outset. This should be applied also to car parks with fewer than 200 bays.

Question 5

Are the parking standards for non-allocated parking requirements appropriate for residential development?

Unfortunately the Council has failed to ask the prior and fundamental question of whether the **allocated** parking standards are appropriate, despite a significant increase in the requirement compared with the *Issues and Options* draft. The Statement of Consultation shows that two respondents to the previous exercise asked for higher rates of residential car parking. One of those had an exaggerated view that even 3-bed houses needed four car parking spaces each. Four respondents, including the Trust, argued for a reduction in the parking provision in urban areas. The Council did not seriously engage with the arguments advanced for reduction.

The new draft requires allocated in-curtilage parking spaces which can be fractional in number per dwelling. For example, for a 3 bed dwelling 1.8 spaces would be required. A note above the table explains that the provision can be "calculated or used as an average across a development site". The Trust's interpretation is that for a development of ten 3-bed dwellings, a total of 18 in-curtilage spaces would be required, and the developers could provide these by having eight dwellings with two spaces, and two dwellings with one parking space each.

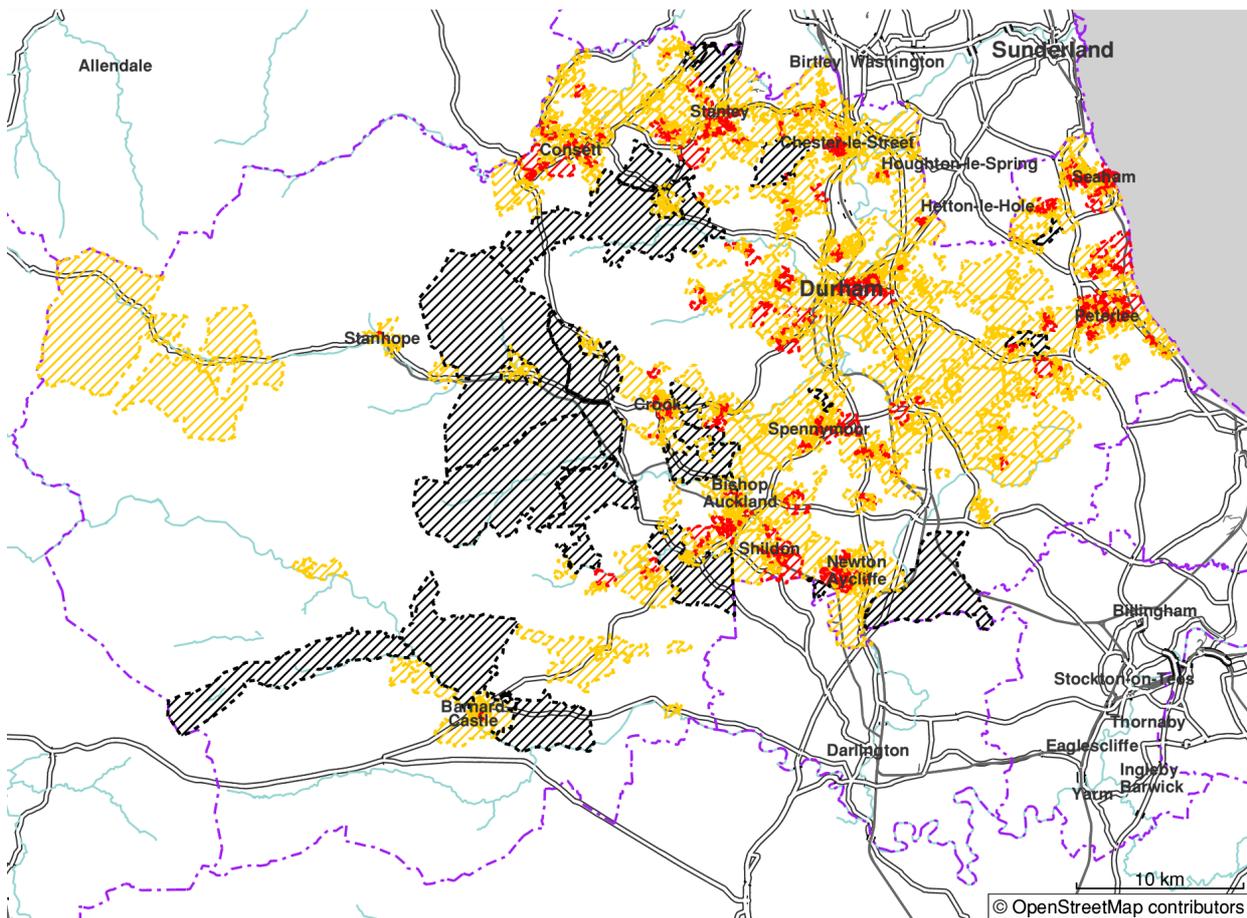
The problem with this approach is that the needs of householders change over time. When the development is occupied, perhaps half of the 3-bed households might have only one car. The people living in the houses with only one space each are no less likely to end up buying a second car than any of the others. The Trust is not advocating for the car parking provision to be rounded up further to 2 spaces per 3-bed house, but would like to see greater flexibility in provision being encouraged, by providing the fractional spaces as unallocated off-curtilage parking which can be used by residents, visitors, or users of other facilities in mixed developments. The 2019 Parking and Accessibility Standards took this approach, with 3-bed

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dwelling being required to have one in-curtilage space and 2 spaces per three dwellings off-curtilage.

Such an approach would be consistent with *Manual for Streets* which suggests in paragraph 8.3.11 that a combination of allocated and unallocated parking “can often be the most appropriate solution” to provide residential parking, and notes several advantages including reducing the land-take through providing only for the average levels of car ownership and catering for car parking demand in mixed-use areas across the day. This can also reduce the need to provide for parking at destinations.

To test the efficiency of the Council's proposed model, the Trust has carried out analysis of parking demand and dwelling types using 2011 census data, which is presented in the Appendix. The Council's model would provide car parking at a level exceeding the demand. In over 400 of the county's 1727 census output areas, over half of the in-curtilage car parking would go unused. In a further 961 areas between 25% and 50% of the allocated provision would be likely to be unused. These areas are shown in red and orange hatching respectively in the following map. The black hatched areas have very high car ownership, and the Council's model may slightly under-provide. Although they look significant, they are relatively underpopulated and amount to only 23 census output areas.



These Trust's main conclusions are:

- The in-curtilage provision is substantially too high for 1 and 2 bedroomed dwellings, but slightly too low for those with 5 or more bedrooms.
- Car parking provision for 3 and 4 bedroomed dwellings should be rebalanced to increase the unallocated element.
- A much greater proportion of the car parking should be provided unallocated. This could allow a 36% reduction in spaces provided by comparison with the SPD, and thereby low the cost of housebuilding.

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Larger quantities of unallocated parking need to be designed carefully, but the Council's *Building for Life SPD* supports a range of parking solutions in paras. 11.2 to 11.5. Unallocated car parking will also need some level of provision for EV charging, but in accessible locations this could be of benefit to non-residents accessing other amenities. A side-effect of greater use of unallocated parking is that there will be more social contact in the street, which can be beneficial for social cohesiveness and mental health.

A model is proposed which would appear to meet the car parking demand more efficiently:

Bedrooms	In-curtilage spaces	Unallocated spaces
1	0	1 per 10 dwellings
2	0	1 per 2 dwellings
3	1	1 per 2 dwellings
4	2	1 per 3 dwellings
5+	3	2 per 3 dwellings

With more time, it would be possible to extend the analysis and recommend policies better tailored to the urban and rural situations, or where sites can be made more sustainable through other transport interventions. For example, the “sustainable urban extensions” to Durham City proposed for Bent House Lane and Sniperley should be expected to attain a lower rate of car parking provision by providing improved walking/cycle routes and public transport penetrating the sites.

Effects of over-provision of residential car parking

There are several downsides to providing more car parking than is actually needed. In-curtilage car parking occupies a lot of land, which could otherwise be used for gardens, communal amenities or for increasing the density of development. Vehicle crossings of the footway to access private drives make the street environment more hazardous for children. Obliging developers to provide residential car parking at the rates proposed in the SPD will increase house prices or reduce viability of developments, especially for dwellings with 1 to 3 bedrooms. It will also reduce the viability of public transport and active travel, making the residents more car-dependent.

This problem is well understood in the professional literature and in independent policy recommendations. An RTPi research paper, “*Settlement patterns, urban form & sustainability: an evidence review*”, May 2018, section 3.5 (pages 17 to 18)¹ covers the evidence on the spatial principles which encourage accessibility by sustainable transport. For good bus accessibility, housing densities of 50 to 100 dwellings per hectare (dph) are recommended. This figure is quoted in the Committee on Climate Change report “*UK housing: fit for the future?*”, February 2019 (page 106)².

Examples of higher density development in Durham City include Victorian terraces such as 1-42 The Avenue, at about 48 dph, Leazes Place at about 60 dph, Lawson Terrace, Mistletoe Street, etc. at over 70 dph, and the modern development of Kirkwood Drive at about 44 dph. Those densities were achieved without including flats, and with the exception of Kirkwood Drive the majority of the car parking is on-street, rather than in-curtilage.

Transport planning, land use planning, and the response to the climate emergency must go hand in hand. If the Council requires a higher rate of residential car parking than is justified by

1 <https://www.rtpi.org.uk/research/2018/may/settlement-patterns-urban-form-and-sustainability/>

2 <https://www.theccc.org.uk/publication/uk-housing-fit-for-the-future/>

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the evidence, this will steer developers away from the very design solutions which are needed to help the shift to sustainable transport and tackle carbon emissions.

Question 6

Do you support the approach to setting standards for parking and accessibility as set out in this document?

The Trust's response to this question is broken down into several sections:

- Anomalies in the document which ought to be easy to address.
- Omissions which reduce the effectiveness of the SPD in furthering national and local policy.
- Overall strategy

Anomalies

Residential car parking for apartments, etc.

The SPD does not offer any guidance on car parking for residential apartment blocks. Purpose-built student accommodation is covered, with an in-curtilage requirement and no separate requirement for visitor spaces.

The Trust is of the view that for apartment blocks the in-curtilage car parking can be most effectively delivered if it is not exclusively allocated by apartment. Because of the variation in the number of cars per household, even between dwellings of similar sizes, providing sufficient car parking allocated to each individual flat will be inefficient, as the spaces allocated to households with fewer vehicles will remain unoccupied. Therefore, a common pool of parking spaces is the best arrangement. It may be that the management company of the apartments would want to control the allocation via an annual rental of parking spaces, in conjunction with a travel plan.

The average (mean) number of cars or vans per County Durham household at the 2011 census was 1.1. Although the Trust has no evidence to offer on the vehicle ownership of apartment dwellers, it seems unlikely that this average would be very much exceeded, unless the apartments were aimed at the very top end of the market. In order to provide some visitor parking spaces, a rate of provision of around 1.2 to 1.3 parking spaces per apartment might be appropriate, though this could be reduced if the location was highly accessible, or if the apartments had very few bedrooms.

Residential cycle parking for apartments, etc.

The SPD does not stipulate how much cycle parking should be provided for apartment blocks and other forms of collective housing. There is no requirement given for cycle parking at Purpose Built Student Accommodation either. This must surely be an oversight.

The 2019 Parking and Accessibility Standards had the following requirement for residential properties without garages:

- where no garage is provided which meets the minimum garage size standard, 2 long stay cycle spaces per 5 bedrooms (40%) should be provided
- where residential units form a block (such as flats or purpose built student accommodation), a minimum of 2 long stay cycle space per 5 bedrooms (40%) should be provided as well as 1 visitor space per 10 bedrooms (10%)
- where a house, which does not have the minimum requirement for garage storage, has been converted to a HMO then 2 long stay cycle spaces per 5 bedrooms (40%) should be provided, where practical

The Trust is of the view that these requirements should be retained in the SPD. They are justified by the current national rates of cycle ownership in the National Travel Survey. Table 11-1 of LTN 1/20 suggests a rather higher rate of one long-stay cycle parking space per bedroom for all types of residential development (except sheltered housing and nursing homes), so the council should give consideration as to whether the 40% rate is sufficient.

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Car parking for PBSAs and the Durham City CPZ

A significant change in the latest draft is the introduction of a requirement for 1 car parking space per 30 students at PBSAs located within 100m of the edge of the Durham City Controlled Parking Zone. PBSAs deeper within the CPZ would not require any student car parking. The intention is to deal with the problem of overspill parking in nearby residential areas: if students have no parking at the PBSA, but uncontrolled residential parking within 100m, they may choose to keep a car on the residential street.

The map of the buffer zone, in Figure 3, is flawed.

- At the simplest level it does not include the whole of the CPZ: controlled parking was extended to Fieldhouse Lane and other parts of North End in recent years.
- While technically the peninsula might be outside the CPZ, showing the CPZ boundary as running along the middle of the Wear and on the alignment of the A690 is not helpful, as the buffer zone then includes South Street, the western side of New Elvet, and the bottom end of Claypath, despite the fact that parking is highly restricted on the bailey.
- Similarly, it is unnecessary to include in the buffer zone those areas which do not actually have any uncontrolled car parking nearby. For example, the terraced streets to the north of Hawthorn Terrace are shown in the buffer zone, but the area immediately outside the CPZ boundary is the route of the East Coast Main Line and Redhills Lane. Land on the west side of South Road is in the buffer zone because the land to the east (part of the university campus) is private and not covered by the CPZ.
- Other anomalies include the Milburngate House site, outside the CPZ and the buffer zone, while Sidegate is shown as inside the buffer zone.

In fact, if you look at the land included in the buffer zone, there is hardly any developable land within the zone, and most of it is not within 100m of unrestricted residential car parking.

Even if the map were to be redrawn, the policy will still be ineffective in managing the problem of overspill accommodation by students. It is well known that the University's policy is to provide no car parking at college accommodation except for a very limited number of students. Most of the PBSA sites allocated by Policy 16.2 of the County Durham Plan are situated outside the CPZ or within the buffer zone. Previous Parking and Accessibility Standards required the same rate of car parking provision (1 per 15 students) as in the draft SPD, yet the colleges on Mount Oswald were approved with minimal car parking. Is it the Planning Authority's intention to enforce the SPD's requirement for car parking in the face of the University's policy on student parking? The University's policy forms part of its Travel Plan, which has been adopted as a condition of other grants of planning permission.

The Trust is supportive of the University's stance in minimising the amount of car parking provided for students, as this reduces the demand for on-street car parking, reduces congestion, and may encourage sustainable travel habits in young people. There are, however, problems with student parking in residential areas, some of which may be as a result of overspill from PBSAs.

Instead of requiring car parking outside the CPZ and in a buffer zone within the CPZ, the Trust would propose a policy which enables the extension of the CPZ if a developer does not wish to provide car parking for students. This could apply if a proposed PBSA is located within 200m, say, of an area of uncontrolled on-street parking, dispensing with the need for Figure 3.

The developer would have to bear the cost of parking surveys in the adjoining area and any residents' consultation before the PBSA opens, and up to five years after opening. If the outcome of a residents' consultation is in favour of extending the CPZ then the set-up costs (e.g. of any pay-and-display equipment) would also be borne by the developer.

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Cycle parking at destinations

The Trust's submission to the *Issues and Options* consultation noted that no visitor cycle parking was required for various types of retail (bulky goods, DIY, builders merchants and garden centres). The Council's comment on this in the Statement of Consultation mentions the change to basing cycle parking provision on floor area, but fails to justify why these types of retail are excluded, and no change was made to the requirement. This was presumably on the assumption that a cyclist would not be able to carry away purchases from these types of retail unit.

The Trust suggests that a minimum of four short-stay spaces for visitors should be provided. People may wish to visit such retail outlets by bicycle to browse, or to 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.

More than one respondent objected to the fact that hot food takeaways were not required to provide cycle parking. The Council's comment in the Statement of Consultation stated "no cycle parking requirement has been made for hot food takeaways and cinemas, as provision of individual stands for every business would lead to street clutter when assessed cumulatively".

This is illogical. If there would be a problem of street clutter, why are other businesses, such as small general retail units, required to provide cycle parking when hot food takeaways are not? The problem of street clutter should not arise as paragraph 3.10 of the revised SPD promotes clustering of cycle parking in town centres. As it stands the SPD requires car parking for hot food takeaways, but not cycle parking. There seems to be no justification for this. Aside from customers, home delivery operators such as Deliveroo would benefit from having cycle parking available nearby.

Omissions

Cycle parking at public transport interchanges

The SPD does not cover car or cycle parking at interchanges such as bus or railway stations. LTN 1/20 Table 11-1 suggests a rate of provision of 1 cycle parking space per 200 daily users at major interchanges, with provision at standard stops being on merit. Cycle parking at transport interchanges is mentioned in paragraph 3.10, but no rates have been set in the SPD.

Accessibility of sites by public transport

Previous Parking and Accessibility Standards have included phrasing to the effect that no residential property shall be more than 400m from a bus stop (e.g. 2019 edition, para. 2.7.3). The draft SPD contains no such wording, but instead uses the 400m metric to determine what is considered an "accessible location". It does not require or encourage development to be in accessible locations.

The County Durham Plan had as a key objective locating jobs and housing in the most accessible and sustainable locations (para. 2.11) but it does not stipulate in any of its policies a minimum distance to bus stops or other public transport. NPPF para. 105 looks for "a genuine choice of transport modes" for significant developments.

Several recent major planning applications for sites allocated in the County Durham Plan (e.g. Bent House Lane, Sniperley Park) have proposed housing which lies more than 400m from a bus stop. It would appear that the draft SPD is weaker than previous standards and if adopted would make it harder to reject housing developments which are not readily accessible by public transport.

The Trust would like to see the SPD strengthened to adopt the latest guidance from CIHT, whose January 2018 publication '*Buses in Urban Developments*'³ recommends maximum walking distances to bus stops which vary according to the frequency of service available. Table

3 https://www.ciht.org.uk/media/4459/buses_ua_tp_full_version_v5.pdf

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4 suggests a maximum walking distance of 500m for core bus corridors with two or more high-frequency services; 400m for single high-frequency routes (every 12 minutes or better); and 300m for less frequent routes.

The Council's *Building for Life SPD* asks if developments are within 400m of a bus stop, but only in the various scoring questionnaires and not in the main body of the document which users vaguer terms: "close to good, high frequency transport routes" (para. 4.1). The questionnaires do not always consider frequency of services. The *Parking and Accessibility SPD* would be the appropriate document to cover transport aspects of applications in greater detail. Adopting the latest CIHT guidance would provide sound evidence-based grounds for requiring sustainable transport interventions from developers proposing housing which is not readily accessible by public transport.

The Trust appreciates that the purpose of the "accessible location" definition in the SPD is limited to deciding whether a reduced level of car parking might be allowable, and that having a fairly loose definition allows more sites to be considered for reduced parking levels. There is a great danger, however, that developers will seek to use the definition to argue that their sites are actually accessible, even when the public transport and active travel connectivity is poor, and thereby avoid making contributions towards sustainable transport improvements.

The Trust would like to see a more thorough assessment of accessibility to inform planning decisions. A points-based scheme like those used by Wiltshire Council and by Bath and North-East Somerset Council would be worth adopting. These were referenced in the Trust's response to the previous consultation round.

Motorcycle parking

Paragraph 162 of the Inspector's final report on the County Plan stipulated that the SPD should provide for "powered two-wheelers". The SPD has been revised to add paragraphs 3.19 to 3.21, covering this topic in a minimal manner. Paragraph 3.19 says that no specific separate standard for motorcycle parking has been set because it is assumed motorcyclists will use car parking bays. The next paragraph encourages provision of anchor points for chaining motorcycles.

It is not uncommon, in the absence of specific provision, to see motorcyclists using ordinary cycle parking: it is clearly attractive to some users because they can chain the motorbike to the cycle stand. As the machines are larger, they tend to block the use of two cycle stands, and because the wheel, rather than the frame, is being locked to the stand, the motorbike will generally protrude from the cycle rack and can obstruct the footway or surrounding space.

The Trust suggests that the SPD should be strengthened so that motorcycle parking with anchor points should be required in certain circumstances. Perhaps a suitable threshold would be where there are ten or more cycle parking spaces, or if cycle parking is accessible to motorbikes but is more convenient than the car parking. As for cycle parking, the motorbike parking should be located and designed to avoid the obstruction of footways when in use.

Car clubs

The Trust made representation during the first round of consultation that provision of car club spaces and membership of car clubs should be encouraged. The Council made no reference to this aspect in its Statement of Consultation, so it is unclear whether this suggestion was considered.

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. This was a document which was commissioned and adopted by the County Council. If the recommendation is not to be reflected in this SPD, then how does the Council propose to achieve this? Policy T2 of the *Durham City Neighbourhood Plan* is also supportive of car clubs. Policy 82, "Parking management" of the *Cambridge Local*

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*Plan 2018*⁴ 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 revised SPD. 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.

With the transition to greater working from home, some households are disposing of second cars. Car club membership is a good option to hasten the reduction in car ownership. The Trust welcomes that the SPD has introduced new requirements for active electric vehicle charging points at new homes, but the move to shared ownership is potentially a more significant means to reducing carbon emissions. It is important that some communal parking spaces in developments are also provided with EV charging, enabling electric cars to be provided for car club use.

Page 54 of the Transport for the North *Transport Decarbonisation Strategy*⁵, December 2021 includes a section on encouraging the uptake of shared mobility.

Use of shared vehicles can be encouraged through the provision of dedicated car club parking spaces combined with stringent parking standards for new development. The use of planning obligations and the Community Infrastructure Levy can fund shared vehicle provision in new developments.

The Council's *Building for Life SPD* mentions car clubs in para. 4.4 but only as one of a number of sustainable travel interventions that might be considered. This falls far short of the "strong support" expected in the *Durham City Sustainable Transport Delivery Plan* and the "stringent parking standards" of the *Transport Decarbonisation Strategy*.

Strategy

Overall, the City of Durham Trust is profoundly disappointed by the Council's revision of this SPD. The Trust made a very full response to the previous consultation, but many of the suggestions were apparently ignored or dismissed without proper consideration. The Trust supplied comparisons with policies developed by several other local authorities, taking care to select recent examples which comply with the latest national guidance, hoping that the Council could benefit from good practice elsewhere. These comparisons were dismissed with the comment that:

The proposed standards are based on Durham TRICS data. It would not be appropriate to amend these standards based on other authorities' approaches as they may be using different methodologies to address different circumstances.

The Council has not explained how Durham TRICS data has been used. There are many possible interpretations of the data, but the Council has not detailed its methodology or even its objectives. Has the Council selected the examples with the highest trip generation, in order to ensure that all parking needs can be accommodated, or instead modelled the policy on sites with a lower proportion of car trips, achieved with the aid of a Travel Plan? Was a high percentage of overspill parking taken to be a bad thing, indicating unsatisfied demand, or a good thing, indicating more efficient land use through use of on-street parking? Did the use of TRICS data take into account that the Durham data may be biased because sites comply with previous iterations of these standards? Have the need for decarbonisation through modal shift and the government's ambitions that half of urban journeys be undertaken by walking or cycling by 2030 been taken into account?

Policy 21 of the County Durham Plan, as adopted after amendment by the Inspector, gives as one of the principles for determining car and cycle parking provision "car parking at destinations should be limited to encourage the use of sustainable modes of transport, having regard to the

4 Cambridge Local Plan 2018, p. 236. <https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf>

5 <https://transportforthenorth.com/reports/tfn-transport-decarbonisation-strategy-dec-2021/>

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accessibility of the development by walking, cycling, and public transport”. Does the SPD limit car parking at destinations in such a way that sustainable transport would be encouraged? Without the evidence of how the proposed rates relate to the expected demand, it is impossible to say. If TRICS data has been used to assess demand, then the rates of provision identified from TRICS would need to be reduced by a percentage in order to suppress demand and encourage sustainable transport. What reduction is the Council actually aiming for? And how does this relate to its wider decarbonisation strategy for the county?

The Trust therefore continues to challenge an SPD which requires a higher rate of car parking provision than is necessary by comparison with the other authorities, and in particular makes no special provision for urban areas like Durham City. The Trust can refer to examples from Bath, where lower rates of parking provision had been adopted despite higher rates of car ownership. This should give cause for concern as to the appropriateness of the Council's methodology.

The tone and emphasis of the Parking and Accessibility SPD seems to be less about accessibility and more about providing plentiful car parking sufficient to meet all anticipated needs. A nod to the climate crisis has been made through active EV charging points and cycle parking.

By contrast, the Transport for the North *Transport Decarbonisation Strategy*, December 2021, imbues a much greater sense of urgency and of the need for dramatic change in transport policy. Here are some excerpts:

p. 53 **Disincentivising car use and avoiding travel**

In addition to making alternative options more attractive, policies that make car travel less attractive or encourage people to avoid travel altogether should be part of the mix. These policies can also generate revenue that can be reinvested in sustainable transport solutions.

...

Parking policy is an important tool to manage demand for car travel. This can include reducing parking supply in urban centres and introducing schemes like a Workplace Parking Levy (see Figure 26). City centre land occupied by parking is often valuable and can be repurposed, for example as cycling infrastructure or green space. Related policies that restrict car access, such as Low Traffic Neighbourhoods, can also be effective at reducing car use and car ownership.

p. 54 **Encouraging the uptake of shared mobility**

Shared mobility refers to a number of different services that make low or zero emission vehicles accessible to people. They can involve lift sharing, car hire, car clubs, demand-responsive bus services, taxis, and cycle and e-scooter hire schemes. Widespread availability of such services can reduce the need to own a car, and lower car ownership is strongly correlated with lower car use.

Use of shared vehicles can be encouraged through the provision of dedicated car club parking spaces combined with stringent parking standards for new development. The use of planning obligations and the Community Infrastructure Levy can fund shared vehicle provision in new developments.

Pages 60-61 detail the actions needed from national government and local authorities to deliver modal shift and demand management. Under “Local Partners – where should local action be prioritised?” the top action under “Planning Policies” is:

- Stakeholder Priority – Use local planning policy to promote ‘15/20-minute neighbourhoods’, prioritise development close to public transport hubs and encourage car-free or car-lite development.

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There is no mention of car-free or car-lite development in the SPD. Durham Cathedral's response to the previous consultation asked for an explicit statement that car-free development would be accepted in the Durham City congestion charge zone. This request has not resulted in any amendment to the SPD. The Trust would like to see car-free development encouraged wherever there is good public transport, walking and cycling access, and where on-street parking is controlled via permit. This would bring much of the Durham City CPZ into scope.

The next three actions for local authorities also relate to car parking:

- Consider introducing a Workplace Parking Levy, utilising lessons learnt from Nottingham.
- Support and facilitate the roll out of car-free zones and streets.
- Develop park-and-ride sites with integrated EV charging infrastructure and cycle parking.

The Council has a head start on the last action, but the SPD does not do enough to support or encourage car-free zones and streets.

The Inspector's final report on the County Plan (para. 162) required Policy 21 and the associated SPD to set out "principles that will be used to determine car and cycle parking and storage provision in order to promote sustainable transport". The SPD does not demonstrate how it will assist in promoting sustainable transport. The paragraph asked that the policy and SPD "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". The SPD makes clear that the standards are not maxima, i.e., they are not limits on the provision of car parking, and the Council said in the Statement of Consultation that maxima could not be justified. The SPD refers to accessibility only in terms of relatively infrequent bus services, and does not have regard to accessibility by walking or cycling.

The SPD as drafted does not deliver these requirements of Policy 21.

Appendix: efficacy of residential car parking model

In this appendix the results of a detailed analysis of 2011 census data for County Durham are presented. The analysis uses the data for the number of cars/vans per household and the number of bedrooms per dwelling, at the level of a census output area. This is the most reliable way to deal with the variation from urban to rural areas, and areas which are more or less prosperous.

Validity of 2011 census data

Can the 2011 census figures be relied on to estimate current car ownership? Indications from the National Travel Survey suggest that they can. The survey includes annual time series⁶ for the number of cars/vans per household, and the percentage of households with no car, one car, and two or more cars. An extract for North East England is reproduced here. There is a close match between the census data for County Durham and the car ownership rates for the North East region from the National Travel Survey.

Statistic	2011 census	2010/11 NTS	2018/19 NTS	2020 NTS
Cars/vans per household	1.11	1.08	1.10	1.18
No car/van	27%	29%	28%	17%
One car/van	43%	42%	40%	60%
Two or more cars/vans	30%	29%	32%	24%

The publication warns that the figures for 2020 are very unreliable because of the small sample size and the effects of the pandemic. The time series for 2002 to 2010 show a steady increase in car ownership in the North East, but from 2010 onwards the figures have remained substantially the same, apart from the anomalous and unreliable 2020 survey results.

The National Travel Survey therefore indicates that it would be reasonable to use the 2011 census data without adjustment, as an estimate of the current situation.

There is considerable variation in ownership rates across the county. Looking at the spread across the 1727 census output areas, the ownership rates are distributed into the following deciles:

Decile	Cars or vans per household (mean)	
	Minimum	Maximum
1	0.2	0.7
2	0.7	0.8
3	0.8	0.9
4	0.9	1.0
5	1.0	1.1
6	1.1	1.2
7	1.2	1.3
8	1.3	1.4
9	1.4	1.6
10	1.6	2.3

Paragraph 107 of NPPF states that parking standards should take into account local car ownership levels. With such variation across the county it is important to verify whether the Council's proposed policy relates and responds to these variations.

6 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1017101/nts9902 ods (accessed 3 June 2022)

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Quantity of residential car parking

Taking the 2011 census data for County Durham, available via NOMIS, it is possible to find the number of households with 1 bedroom, 2 bedrooms, etc. and work out how many residential car parking spaces there would have been across the county if the SPD policy could be applied retrospectively to the existing housing stock. The calculation yields a total of 431,070 parking spaces, of which 374,455 would be in-curtilage and the remainder of 56,615 would be unallocated on-street spaces.

It is also possible to calculate the number of cars and vans across the county. This comes to 248,586.

The SPD policy, if it could be applied retrospectively, would result therefore in 1.73 parking spaces per car or van, or 1.51 spaces if only in-curtilage provision is considered. The in-curtilage provision is particularly inefficient, as this will only be available to the householders. Therefore at least a third of the in-curtilage provision will go unused.

That top-level analysis assumes that the cars are neatly allocated to the available in-curtilage spaces, but in reality this will not be the case. There were 60,926 households with no car or van in 2011, and as the SPD policy requires at least one in-curtilage parking space per dwelling, that many spaces will immediately be wasted. Some of the car-free households will be occupying dwellings with more than one in-curtilage parking space: in fact only 14,222 dwellings had only one bedroom, so at least 46,704 car-free households will be occupying dwellings of 2 bedrooms or more, where the rate of car parking provision is at least 1.3 per dwelling (plus visitor spaces). That rate implies for every three houses, two will have one parking space and the third will have two. We cannot assume that the car-free households all live in the houses with one parking space.

The following table shows the usage and non-usage of in-curtilage parking spaces that would result from application of the SPD rates to the 2011 housing stock. The calculations were performed at the level of each individual census output area and then totalled to give a summary for the whole county. This analysis assumes that we fill up the 1 bedroom and then the 2 bedroom properties with the no-car households. The households with 1 car are then allocated the remaining 2 bedroom properties, etc., with the households owning the most cars being assigned to the largest houses. This would not happen in practice, of course, but it tests the SPD parking rates against the most efficient possible allocation of housing.

Bedrooms	Dwellings	In-curtilage spaces				On-street spaces		
		Number	Used	% used	Unused	Number	Used	% used
1	14222	14222	113	1%	14109	3687	0	0%
2	75824	99366	32941	33%	64425	19165	55	0%
3	99941	180591	124267	69%	56324	25195	6418	25%
4	27295	63558	56789	89%	6769	7027	5642	80%
5+	6521	16718	16160	97%	558	1756	6087	347%
TOTAL	223803	374455	230270	61%	144185	56615	18202	32%

The table suggests that it would be better to provide the car parking for 1 and 2 bedroom dwellings mainly through unallocated spaces, either on-street or in communal parking areas. A third of the unallocated/visitor spaces provided by the SPD would be used by households owning multiple cars.

The situation for dwellings of 5 or more bedrooms is instructive. Not quite all of the in-curtilage spaces would be used. At a rate of 2.5 spaces per dwelling half of the dwellings would have 3 parking spaces, but some households would have fewer than 3 vehicles. Even though there

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would not be 100% utilisation of the in-curtilage spaces, there would need to be a substantial amount of unallocated parking: a rate of almost 1 space per dwelling would be needed to meet the demand. Obviously if the 5-bedroom houses formed part of a larger mixed development, the provision would even out.

With the 3-bed houses, which are allocated in-curtilage parking at an average rate of 1.8 spaces per dwelling, 31% of the allocated spaces would be unused. Nevertheless a quarter of the unallocated spaces (at the rate of 1 per four dwellings) would also be required.

The findings emphasise that unallocated parking is an essential part of the provision, whether for smaller or larger houses, and that it needs to be provided at a higher rate than in the SPD. The data also suggest that a mixture of housing types within a development will help to spread the unallocated parking efficiently. Developments where all the larger houses are clustered together will be likely to see more issues over inadequate car parking provision. Incorporating a range of property sizes and types is supported by para. 5.3 of the Council's *Building for Life SPD*.

The *Issues and Options* version of the SPD had a lower rate of in-curtilage provision. Here is the equivalent table resulting from analysing the census data against those policies:

Bedrooms	Dwellings	In-curtilage spaces				On-street spaces		
		Number	Used	% used	Unused	Number	Used	% used
1	14222	14222	113	1%	14109	3687	0	0%
2	75824	75824	32899	43%	42925	19165	97	0%
3	99941	99941	96081	96%	3860	25195	34604	137%
4	27295	54590	53576	98%	1014	7027	8855	126%
5+	6521	13042	12934	99%	108	1756	9313	530%
TOTAL	223803	257619	195603	76%	62016	56615	52869	93%

The revised SPD increased the in-curtilage car parking provision over the rates set in the *Issues and Options* version of the SPD. An increase in car parking seems to be justified for properties with 3 or more bedrooms, because the on-street parking provision would have been unable to cope with the demand in a development comprised of these house types, but it would probably have been more efficient to increase the rate of unallocated parking rather than the in-curtilage provision. There was no apparent justification for increasing the car parking rates for 2 bedroom dwellings from 1 per dwelling to 1.3 per dwelling.

Even though there were faults with the *Issues and Options* model, note that for a mixed development having the same balance of housing types as the overall housing stock in the county, the *Issues and Options* rates do cover the demand, with much more efficient use of land.

The 2019 Parking and Accessibility Standards had another allocation model, with a slightly higher unallocated rate (1 space per 3 dwellings for most house types, 2 per 3 for 3-bed houses), but otherwise the same model as the *Issues and Options* version. Let us see how this performs:

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Bedrooms	Dwellings	In-curtilage spaces				On-street spaces		
		Number	Used	% used	Unused	Number	Used	% used
1	14222	14222	113	1%	14109	4692	0	0%
2	75824	75824	32899	43%	42925	25274	97	0%
3	99941	99941	96081	96%	3860	66621	34604	52%
4	27295	54590	53576	98%	1014	9095	8855	97%
5+	6521	13042	12934	99%	108	2113	9313	441%
TOTAL	223803	257619	195603	76%	62016	108691	52869	49%

The higher rate of on-street provision certainly helps for 3-bedroomed houses, and eases the provision for larger houses, but there might still be issues in estates consisting mainly of houses with 3 or more bedrooms, depending on the distribution of housing types. The over-provision for smaller houses would be worse.

Here is an alternative option, based on maximising land-use by providing more unallocated spaces:

Bedrooms	In-curtilage spaces	Unallocated spaces
1	0	1 per 10 dwellings
2	0	1 per 2 dwellings
3	1	1 per 2 dwellings
4	2	1 per 3 dwellings
5+	3	2 per 3 dwellings

This yields the following results via the 2011 census model:

Bedrooms	Dwellings	In-curtilage spaces				On-street spaces		
		Number	Used	% used	Unused	Number	Used	% used
1	14222	0	0	100%	0	1353	113	8%
2	75824	0	0	100%	0	38342	32996	86%
3	99941	99941	96081	96%	3860	50417	34604	69%
4	27295	54590	53576	98%	1014	9095	8855	97%
5+	6521	19563	18474	94%	1089	4408	3773	86%
TOTAL	223803	174094	168131	97%	5963	103586	80341	78%

The total parking spaces required, 277,680, represents a 36% reduction compared to the SPD's requirement of 431,070.

The main conclusion is that the unallocated parking element should provide a higher proportion of the total, in order to make more efficient use of land and deliver more sustainable development. The rates of provision for dwellings with 1 to 3 bedrooms are not well-matched to the demand.

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For urban developments in accessible locations, lower rates would be appropriate. The “sustainable urban extensions” to Durham City proposed for Bent House Lane and Sniperley should also be able to attain a lower rate of car parking provision through sustainable transport interventions such as improved cycle routes and public transport penetrating the sites.