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10 March 2025

Mr Allan Fenwick
Durham County Council Planning Department
PO Box 274
Stanley, Co. Durham
DH8 1HG

Dear Mr Fenwick,

DM/25/00144/FPA – Ramside Hall Hotel, Ramside, Durham, DH1 1TD

Car park extension with associated landscape

Summary

The application form states that the current car park capacity at Ramside Hall is 641 spaces, and this proposal would increase this by 71 to 712, an increase of 11%.

The Trust considers that the application does not comply with County Durham Plan policies 7, 10 and 21 because the site is not sustainable in transport terms, the car park extension would significantly intensify accessibility by unsustainable modes of transport, and the current application and existing access to this site have not prioritised walking, cycling or public transport access.

The applicant has also not addressed Policy 20 regarding development in the Green Belt. While a car park extension is not classed as inappropriate Green Belt development, it can harm openness, and significant weight should be attached to that.

The applicant's Planning, Design and Access Statement concludes that the proposal is in accordance with policy, but this is wholly unreliable as the statement omits mention of policies 20 and 21, and that part of policy 7 which conflicts with the proposal. The statement does not mention the breaches of policy detailed below, and the applicant has not justified the non-compliance through arguments such as economic benefit. As the application stands, there is therefore insufficient justification to allow the Planning Authority to approve this application.

In previous applications the applicant has used arguments such as job creation, and the need to improve the offer in a competitive market, to justify building in the Green Belt and the intensification of existing uses. The Trust's key concern is the heavy reliance of the site on access by unsustainable transport modes. The applicant must not be allowed to justify inappropriate development in the Green Belt by referring to a competitive market if their competitors are more sustainable.

Policy 21 seeks to limit car parking at destinations in order to promote sustainable modes, and the policy requires that walking, cycling and public transport access be prioritised. The Trust suggests various measures below to achieve this.

Policy context

Policy 7: Visitor Attractions

The Planning, Design and Access Statement summarises aspects of this key policy, but omits mention of the first clause, one of four which must all be satisfied for an application to be permitted. Taken in context, that part of the policy states that “the provision of new visitor attractions, or the expansion of existing attractions will be permitted provided they are ... located in sustainable and accessible locations, or can be made so ...”.

The applicant has not demonstrated the sustainability of the location, and indeed the need for the car park expansion rather suggests that the location is not sustainable in transport terms.

Policy 10: Development in the Countryside

The Planning, Design and Access Statement responds to the General Design Principles in Policy 10. In particular, development in the countryside must not, by virtue of siting, scale, design or operation:

- p. be solely reliant upon, or in the case of an existing use, significantly intensify accessibility by unsustainable modes of transport. New development in countryside locations that is not well served by public transport must exploit any opportunities to make a location more sustainable including improving the scope for access on foot, by cycle or by public transport;
- q. be prejudicial to highway, water or railway safety

The statement mentions that the estate is “situated only 3.5km from Durham City Centre and is well connected to bus routes and the adjacent Park and Ride facility” and that “the proposed development will have no material effect” on highway safety, but this is not evidenced.

Policy 10 also points out that development in the countryside must accord with all other relevant development plan policies. There are at least two significant policies which have not been mentioned in the planning statement, as follows:

Policy 20: Green belt

This policy states that development proposals within the green belt will be determined in accordance with national planning policy. This is found in NPPF paragraphs 153-160. As no justification of “very special circumstances” has been submitted, the applicant must be relying on the development being appropriate for the Green Belt, via one of the exceptions in para. 154. The exception usually applied to car parking is para. 154(h)(ii) “engineering operations”. But the applicant would need to demonstrate that openness is preserved and that the development does not conflict with the purposes of including land within the Green Belt. This has not been addressed in the statement.

Appeal decisions have concluded that a car park has an effect on openness, which may be both visual and spatial. Inspector Elaine Gray, APP/H4505/C/23/3324826, noted that the effect on openness is more pronounced if the car park is used, and that a car park also has an urbanising effect, conflicting with the purposes of including land in the Green Belt. Inspector A O'Doherty, APP/B1930/W/21/3272537, noted that there is a spatial aspect to openness, not just a visual one, and that “openness can be harmed even when development is not readily visible from the public realm” (para. 6).

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While the screening proposed will reduce the visual impact, the spatial impact remains. Part of the land is currently patio, but much is managed grassland, and occupying this land with a car park will reduce the spatial openness of the site. According to NPPF para. 153 “local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness” other than in the case of previously developed land or grey belt land.

Considering there is harm to openness, the applicant needs to demonstrate that there are benefits which clearly outweigh the harm, and that the harm is limited to the minimum required to achieve the benefits. Is the lack of free space in the current car park causing a level of harm which would outweigh the harm to openness were the development to be approved? Could the car park be managed better, to reduce demand? The application contains no numerical evidence of car parking demand, the extent to which is demand is currently unmet, or the resulting impact on the business. There is no consideration of other mitigations, such as sustainable transport interventions considered below.

Policy 21: Delivering Sustainable Transport

There are various relevant points in Policy 21. All development is expected to deliver sustainable transport by prioritising walking, cycling and bus transport over cars (clause 'a') and “providing appropriate well-designed, permeable and direct routes for walking cycling and bus access” linking to existing services, facilities and routes (clause 'b'). It is required that “any vehicular traffic generated by new development, following the implementation of sustainable transport measures, can be safely accommodated on the local and strategic highway network” (clause 'c'). In addition “cycle parking or secure cycle storage should be provided to facilitate increased cycle ownership and use” and “car parking at destinations should be limited to encourage the use of sustainable modes of transport, having regard to the accessibility of the development by walking, cycling, and public transport”.

The policy also refers to the production of the Parking and Accessibility SPD which was adopted in 2023.

Parking and Accessibility SPD

The SPD defines an accessible location as one with at least two bus services per hour between 6am and 6pm within 400m of the site, but this only relates to determining whether car parking provision may be reduced below that required in the SPD. It is explicitly stated that walking and cycling accessibility is not defined in the SPD.

The SPD includes recommendations for car parking provision at fitness clubs, sports facilities, hotels and restaurants. The recommendations are neither minimum nor maximum standards. There are also requirements for both short and long stay cycle parking which are based on floor area of leisure facilities, number of hotel bedrooms and number of staff. These are minimum requirements. The applicant has not provided the data needed (e.g. floor area of facilities, number of staff) that would be required to assess compliance.

The web site states that there are 127 bedrooms at the hotel. The SPD would therefore require around 10 long-stay (enclosed, secure and covered cycle spaces) for guests in addition to spaces for staff. Short stay cycle parking spaces would additionally be required for the spa, restaurant and hotel facilities, but the applicant has not provided data on the floor area assigned to these uses. Nor is there any information on current cycle parking facilities within the application.

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The rate of car parking provision suggested in the SPD is 1 space per bedroom. Deducting the 127 spaces required for the hotel from the current total of 641 car parking spaces leaves 514, demonstrating that the non-hotel activities generate considerable vehicular traffic.

Site accessibility

None of the following information was provided in the application.

Walking

A footway extends from the A690 Park and Ride / Carrville junction along the south side of the A690 as far as the Ramside Hall bus stop. From there a path leads into the application site. The public footway is adjacent to the 50mph carriageway and is therefore unpleasant to use, particularly as there is no verge and the width of the footway, including kerb, is as little as 85cm in places. There is sufficient highway space to widen the footway along most of its length. The most constrained area is under the former railway bridge. Here widening the footway would entail narrowing the carriageway, which would be relatively costly, and might also require speed reductions.

The path into the Ramside Hall site from the bus stop starts with a steep section which would need to have the gradient checked for wheelchair suitability. The tarmac surface continues until it meets the main access road, but it is in a bad state of repair, and the intact surface is only 60cm wide in places, making it unsuitable for wheelchair use. The access road is not provided with a footway, but a footpath continues parallel to it as far as the car parks. This path has an unsealed surface. The parallel access road is lit. The path could probably be upgraded without difficulty.

Cycling

There is a shared-use path of reasonable width on the opposite side of the A690, but to reach the application site cyclists would need to dismount and use the foot crossing. According to LTN 1/20 Table 10-2, for a road with a speed limit of 50mph, and two or more lanes to be crossed in a single movement, as in this situation, anything less than a signalised crossing would be considered “suitable for few people and will exclude most potential users and/or have safety concerns”.

If a signalised crossing is not provided, the most obvious alternative is widening the A690 south side footway and designating it as shared use. This would need to be designed in accordance with LTN 1/20, including providing a horizontal separation of at least 1.5m between the carriageway and the cycle track (LTN 1/20 Table 6-1).

There appears to be no short-stay cycle parking on the application site, but the Trust has been informed that secure cycle parking is available to hotel guests.

Public transport

The applicant has already pointed out, in response to Policy 10(p), that the site is served by bus routes, including the Park and Ride. Go North East service 20 from Durham to Sunderland serves the Ramside Hall bus stop four times an hour. The bus stop on the near side of the road is about 350m from the main building complex. To reach the bus stop for the other direction, users have to cross a 50mph dual carriageway, with two lanes in each direction. Dropped kerbs are provided, and a narrow path across the central reservation. No shelter or seating is provided at either stop.

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The Park and Ride bus stops are about 750m from the Ramside Hall buildings, with several pedestrian crossings to navigate to cross to the south side of the A690. At such a distance the bus services are unlikely to be attractive to users of the site.

Nevertheless, as far as public transport is concerned, the site would be considered accessible according to the Parking and Accessibility SPD.

Highway safety

Although there have been no collisions at the access road junction with the A690 reported in the last ten years, between 2000 and 2014 there were six collisions involving cars at this junction, two of which were fatal. As there may have been changes to the junction, or to the speed limit, since 2014, the absence of recent reports means we must conclude that the junction is operating safely. This does not imply that the road layout is safe for pedestrians or cyclists, as the number of users may be too low to draw any conclusion, or indeed, there may be reduced demand because of a perception of danger.

Reliance on unsustainable modes

The poor state of the pedestrian access path and the lack of short-stay cycle parking suggest that foot, cycle and bus travel to the site is negligible, and that the site is solely or mainly reliant on unsustainable modes of transport.

While the site would be considered accessible by public transport according to the SPD, the poor state of the pedestrian access path would limit access for those with mobility impairments, and the challenges in crossing the A690 would discourage public transport use. The site is not considered accessible by cycling according to national design guidance.

Assessment

Policy 21 states that “car parking at destinations should be limited to encourage the use of sustainable modes of transport, having regard to the accessibility of the development by walking, cycling, and public transport”. The applicant has not provided any evidence as to whether the shortage of parking spaces has encouraged use of sustainable modes, nor whether there has been any promotion of sustainable access. Many visitor attractions offer a reduction in charges to those arriving by bus or other sustainable modes. It is possible that the target market for the luxury facilities on the Ramside Hall estate would be expected to consist exclusively of car owners, but neither the County Durham Plan nor the NPPF would admit such an exemption from sustainable transport policies.

It is noticeable that none of the planning applications at Ramside Hall over the last ten years have allowed that there might be any impact on vehicular traffic to the site, and none of them have provided any data on the modal distribution of travel by existing users and staff. No surveys of car park occupancy have been provided to justify the current application.

If the site is accessible, then according to Policy 21 the first recourse should be to limit the car parking at its current level and seek to accommodate increased demand via sustainable modes. Policy 10 indicates refusal of development in the countryside which will “significantly intensify accessibility by unsustainable modes of transport”. An 11% increase in the car parking provision would be a significant intensification.

If the site is not accessible by sustainable modes, Policy 7 would suggest refusal of the development, unless the site can be made accessible. Policy 21 also supports prioritisation of access by walking, cycling and public transport. Policy 10 states that “development in

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countryside locations that is not well served by public transport must exploit any opportunities to make a location more sustainable including improving the scope for access on foot, by cycle or by public transport”. Although the bus services are good, there is clearly room to improve access.

Therefore, whether the site is judged accessible or not, it is considered necessary to make sustainable transport improvements. The Trust has identified the following possible measures:

- widening the A690 south side footway from the Carrville Park and Ride junction to the Ramside Hall bus stop, and designating it as shared use, to improve cycling and walking accessibility
- easing the gradient on the pedestrian access path as it leaves the A690, which may currently be unsuitable for wheelchairs
- widening the pedestrian access path, renewing the degraded tarmac surface, and upgrading the unsealed surface
- ensuring the path is adequately lit over its full length
- providing crossings over vehicular routes to give safe access to all facilities on the site
- cycle parking at the minimum levels required by the Parking and Accessibility SPD.

There could also be promotional inducements such as discounts, to encourage use of sustainable modes by customers. Promotion of car sharing and bus ticket subsidies for staff might reduce car parking demand among employees.

It may be difficult to achieve a widening of the A690 south side footway which complies fully with national design guidance. Therefore, to give potential visitors and staff alternatives, the Trust suggests that, in addition, consideration be given to providing walking and cycling access from Pittington Lane. This would help meet the requirement of Policy 21(b) to provide “well designed, permeable and direct routes for walking, cycling and bus access, so that new developments clearly link to ... existing routes for the convenience of all users”. A new path might be required alongside Pittington Lane from the 30mph section of Broomside Lane to reach the access point safely.

Yours sincerely,

John Lowe

Chair, City of Durham Trust