

# **Statement of Consultation - Parking and Accessibility SPD**

## **Introduction**

This Consultation Statement sets out details of the consultation Durham County Council has undertaken in the preparation of the County Durham Parking and Accessibility Supplementary Planning Document (SPD) Issues and Options.

## **Consultation Requirements**

This statement has been prepared in accordance with the requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012. Regulation 12 requires the council to prepare a consultation statement setting out the persons consulted when preparing an SPD, a summary of the main issues raised by those persons, and, how these have been addressed in the SPD. Key council officers, members and other stakeholders were consulted in the preparation of the SPD and as part of the public consultation process.

## **Consultation on the draft Parking and Accessibility SPD (January/February 2021)**

The SPD was made available on the council's consultation website, with physical copies available on request. Copies were not distributed to libraries and Consumer Access Points (CAPs) due to the national lockdown caused by the Coronavirus pandemic.

Statutory consultees were consulted in accordance with regulation 35 of the Act. All general consultees on the council's database were also informed, via letter or email. Consultation on the first draft SPD took place between 15 January to 26 February 2021. Following on from this a second draft of the SPD will be prepared and consulted on later in 2021.

## **Background and Aims of SPD**

The County Durham Plan was adopted in October 2020, following Examination in Public (EiP) by a government-appointed Inspector. Through the examination, the Inspector concluded that the Council's Parking and Accessibility Standards which are currently in place are not fit for purpose. In particular, the Inspector considered that the Standards should limit car parking in areas accessible by public transport, to encourage people to use sustainable travel. He also expressed that new standards should be written into a full supplementary planning document (SPD), which then formally sits under the Council's Plan.

As a result, the Council agreed to create new parking standards and adopt them in an SPD. The Council committed to writing a Parking and Accessibility SPD, to replace the current Standards, as part of Policy 21 of the Plan. The Parking and Accessibility SPD will enable planning and highways officers to require specific, agreed standards for parking and accessibility of development, which should be adhered to as part of planning applications. The SPD will cover the whole of County Durham, with room to negotiate a different parking requirement if appropriate at accessible locations, which will be defined by the document. Key stakeholders include developers, planning consultants, and residents. The purpose of the initial round of consultation will be to establish broadly appropriate standards for parking and accessibility; the second will be to seek comments on a drafted SPD.

## **Responses**

The consultation process yielded 152 comments in total. The tables below show the comments received and the Council's response to them.

**Table 1** - Question 1: What frequency of public transport services (daytime services per hour) should be required for a location to be considered accessible?

Respondent	Comment	DCC Response
Kelly Monahan	I think every half hour is fine. That's a maximum 30min wait, average 15min wait.	Thank you for your comments.
Paul Armstrong (Trust Pathways)	The provision of car parking in the city or other large urban centres reduces the attraction of using public transport and we'd imagine reduces the viability for such schemes. We feel a half-hourly service would not be sufficient to enable people to avoid waiting an excessive amount of time if it is to be reasonably competitive with the private car. By comparison, for car-free developments, Oxford City Council requires proposal sites to be within a 400m walk of a high daytime frequency (say 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. Making car parking more expensive can also enable removal of some of the car parking for planting or parklets within urban areas and streets. this revenue could also be used to supplement the bus services.	Thank you for your comments. Durham is a big county with largely rural areas. The definition of an accessible location has been drafted with regard to national guidance but without being so narrow as to exclude much of the county, particularly rural Durham. Whilst more bus services would make locations more accessible, the frequency of bus services usually depends on the viability of the services for the public transport operating companies or in more remote areas, is dependent on subsidies administered by the Local Authority.
Janet Hutchinson	Every 15- 20 minutes. But there should be more emphasis placed on walking and cycling route accessibility of developments (and connecting areas) not just public transport. Modal shift to active travel has to be the priority to tackle the climate, air quality and obesity crises.	Thank you for your comments. The definition of an accessible location aims to set a minimum standard which should be met for development to offer less car parking provision.  The SPD also contains requirements for the provision of cycling parking while the County Durham Plan, policy 21 requires development to prioritise sustainable modes.

Peter M Aitken OBE	I think the minimum interval should be 20 minutes. My reason :- whenever one service is cancelled or is 'just missed' by the passenger, to wait an extra 20 minutes is reasonable whereas 30 is much less so.	Thank you for your comments. The definition of an accessible location aims to set a minimum standard which should be met for development to offer less car parking provision. The Council would be supportive of a more frequent bus service where possible.
Sunny Ali (Highways England)	It is not fully clear at this early stage of the SPD as to the intent of defining an 'accessible destination' with a view to the benchmarks identified (i.e. what is the outcome if a location is or is not considered accessible). While the 'accessible destination' is referred to later in the document when detailing parking standards, an explanation at the outset may be of benefit. Furthermore, while the definition of an accessible location has been made with reference to the distance from a sustainable mode and the frequency of that mode, the likelihood of someone using that sustainable mode also relates to if or not the sustainable mode serves the locations that people would wish to access. While this may not be a consideration for the purpose of defining an 'accessible destination' in the context of this SPD, it should be made clear that factors such as this will need to be considered through the planning application process when determining the sustainable credentials of a site.	<p>Thank you for your comments. The definition of an accessible location aims to set a minimum standard which should be met for development to offer less car parking provision. The Council accepts that not every site will be accessible, and that the definition is a fairly general way to assess accessibility.</p> <p>Keeping the definition of accessibility fairly general allows more flexibility at the planning application stage. We will amend the text in the SPD to make this clearer.</p>
Len Shield	The time depends on bus destination. More than one numbered bus will stop at each bus stop but it the first or second may not be what the traveler requires. So how can you determine the time between. We have a limited number of train station in the county so how can you use 800m distance when 95% of business and population are more than that	Thank you for your comments. The definition of an accessible location aims to set a minimum standard which should be met for development to offer less car parking provision. The Council accepts that not every site will be accessible.
City of Durham Trust	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 halfhourly 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	<p>Thank you for your comments.</p> <p>Durham is a big county with largely rural areas. The definition of an accessible location has been drafted with regard to national guidance but</p>

	(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.	without being so narrow as to exclude much of the county, particularly rural Durham.  The definition of an accessible location aims to set a minimum standard which should be met for development to offer less car parking provision. The Council accepts that not every site will be accessible.
Anonymous	As a minimum this should be two, however consideration should be given to an option of additional bus services during peak times.	Thank you for your comments. This standard is intended as a minimum under which a destination can be considered accessible. It would not impact on bus provision, which falls beyond the scope of this SPD.

**Table 2 - Question 2: Do you agree with the definition of an accessible location proposed by the Council?**

<b>Respondent</b>	<b>Comment</b>	<b>DCC Response</b>
Paul Armstrong (Trust Pathways)	Trust Pathways (TP) does not agree with the definition proposed by the Council. Most urban locations would be classed as accessible in this definition, and while this would permit a reduced level of car parking provision, which TP would support, it would not obligate a reduction and the methods for coming to an assessment of the appropriate level of parking are greyed. Developer contributions towards improving accessibility by sustainable modes may be difficult to obtain should the definitions be woolly. Developers may escape having to make contributions to improvements to cycling and walking infrastructure, and also may be permitted to provide less than adequate levels of car parking which may result in overspill parking into neighbouring streets. The SPD should distinguish between a measure of accessibility of the site sufficient for there to be potential for reducing car parking, and the degree of accessibility which the site should attain in order for the development to be considered sustainable, below which developer	The purpose of providing a definition of an accessible location is to allow DM officers to require a lower level of parking. Developer contribution requirements will not be affected. It would not be feasible to incorporate walking and cycling accessibility within the definition as it would not be possible to assess this accurately for every application. However, text will be added to the SPD to clarify that this definition of accessibility does not define walking and cycling accessibility and that walking and cycling accessibility is still an important component that requires separate

	<p>contributions would be required towards improvements. A token gesture Transport statement should not be submitted and instead a detailed cycle and walking assessment be made. Linkages of funding from developers to monies for the work in LCWIPs could be combined to make schemes happen.</p>	<p>consideration in planning applications.</p> <p>The requirement for walking and cycling modes to be prioritised on development sites falls outside the scope of this document but is included in the Delivering Sustainable Transport Policy (Policy 21) of the County Durham Plan. This Parking and Accessibility SPD does though set out a high provision for cycle parking.</p>
<p>Sunny Ali (Highways England)</p>	<p>It is not fully clear at this early stage of the SPD as to the intent of defining an 'accessible destination' with a view to the benchmarks identified (i.e. what is the outcome if a location is or is not considered accessible). While the 'accessible destination' is referred to later in the document when detailing parking standards, an explanation at the outset may be of benefit. Furthermore, while the definition of an accessible location has been made with reference to the distance from a sustainable mode and the frequency of that mode, the likelihood of someone using that sustainable mode also relates to if or not the sustainable mode serves the locations that people would wish to access. While this may not be a consideration for the purpose of defining an 'accessible destination' in the context of this SPD, it should be made clear that factors such as this will need to be considered through the planning application process when determining the sustainable credentials of a site.</p>	<p>The purpose of providing a definition of an accessible location is to allow DM officers to require a lower level of parking. It would not be possible to include consideration of where people are travelling from in the definition as this would be too onerous.</p> <p>Keeping the definition of accessibility fairly general allows more flexibility at the planning application stage. We will amend the text in the SPD to make this clearer.</p>
<p>Peter M Aitken OBE</p>	<p>Yes.</p>	<p>Thank you for your comments.</p>
<p>Anonymous</p>	<p>Yes. However, the definition of an accessible location does not mention how easy it is to walk or cycle to or from the site. This is just as important as the bus access.</p>	<p>Thank you for your comments. It would not be feasible to include active travel provision in the definition of an accessible location as it is impossible to know where people are travelling from. The proposed definition accounts for sustainable alternatives to the private car without being overly complicated.</p>

		<p>However, text will be added to the SPD to clarify that this definition of accessibility does not define walking and cycling accessibility and that walking and cycling accessibility is still an important component that requires separate consideration at the planning application in accordance with Policy 21 (Delivering Sustainable Transport) of the County Durham Plan.</p>
<p>Janet Hutchinson</p>	<p>Not entirely, as ease of active travel routes should be prioritised as per the user hierarchy in the Manual for Streets. New parking provision needs to be accessed in detail against any AQAP.</p>	<p>Thank you for your comments. It would not be feasible to include active travel provision in the definition of an accessible location as it is impossible to know where people are travelling from. The proposed definition accounts for sustainable alternatives to the private car without being overly complicated.</p> <p>The requirement for walking and cycling modes to be prioritised on development sites falls outside the scope of this document but is included in the Delivering Sustainable Transport Policy (Policy 21) of the County Durham Plan. This parking and accessibility SPD does though set out a high provision for cycle parking.</p> <p>However, text will be added to the SPD to clarify that this definition of accessibility does not define walking and cycling accessibility and that walking and cycling accessibility is still an important component that requires separate</p>

		<p>consideration at the planning application in accordance with Policy 21 (Delivering Sustainable Transport) of the County Durham Plan.</p> <p>Major planning and development schemes within an AQMA and surrounding areas will need to be assessed to determine any impact on air quality and showing any ameliorating design measures in accordance with the Amenity Policy (Policy 21 of the County Durham Plan).</p>
Kelly Monahan	I don't agree that accessibility relies on public transport. I don't care how many buses there are, I'm never going to use one. People prefer cars, they're cleaner and more convenient.	Thank you for your comments. The definition of an accessible location aims to set a minimum standard which should be met for development to offer less car parking provision.
Len Shield	The car parking provision must relate to the projected business foot fall by car. Due to the virus 19, busses will be less used due to fear. The car will be more used. So this needs to be lifted in car parking number pre site. As by 2030 all new cars will be electric by order of government the % of charging points must be lifted to future proof	Thank you for your comments. The proposed levels of EV charging aim to facilitate on-the-go charging whilst acknowledging that many people will charge at home or at an EV charging station. Regarding the decline in public transport use, the Council considers that it would not be appropriate to permanently increase parking provision in response to a temporary situation.
City of Durham Trust	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	The purpose of providing a definition of an accessible location is to allow Development Management officers to require a lower level of parking. Developer contribution requirements

	<p>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 &amp; 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,</p>	<p>will not be affected. It would not be feasible to incorporate walking and cycling accessibility within the definition as it would not be possible to assess this accurately for every application. Walking and cycling improvements are outside the scope of this document.</p> <p>The requirement for walking and cycling modes to be prioritised on development sites falls outside the scope of this document but is included in the Delivering Sustainable Transport Policy (Policy 21) of the County Durham Plan. This parking and accessibility SPD does though set out a high provision for cycle parking</p> <p>Increasing turnover is a matter for car park operators. Regarding parking at residential development, the Council's experience is that limiting car parking would be inappropriate as it leads to amenity issues. This approach is consistent with national policy as set out in NPPF paragraph 106.</p>
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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<sup>16</sup> 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<sup>17</sup> 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<sup>18</sup> and is described on p. 20-21 and Appendix C of that document. 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<sup>19</sup> produced by the Durham City Neighbourhood Plan Working Party;
- crowd-sourced data such as Widen My Path<sup>20</sup> and Street Space County Durham<sup>21</sup> which were gathered during the first Covid-19 lockdown but which are of longer-term value. 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.	
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**Table 3 - Question 3: Do you agree with the standards for retail destinations?**

<b>Respondent</b>	<b>Comment</b>	<b>DCC Response</b>
Kelly Monahan	No. Virtually everyone drives. There needs to be way more parking spaces.	Thank you for your comments.
Philip Timmins	There is far too much provision for car parking especially compared to cycle parking of which there is far too little. The balance should be the other way around in order to help achieve the Council's climate change agenda, because it would make developments much more attractive and because pedestrians and cyclists spend as much if not more in the shops they visit than car drivers. It would also help to favour town and village centre locations rather than out of town of which there is too much and which is helping to kill town and city centres.	Thank you for your comments. The proposed standards aim to enable people to cycle by providing the necessary infrastructure. However, adequate provision must also be made for car parking to prevent amenity issues arising from inappropriate parking.
Heather Evans (Cycling UK)	Questions 3-6 ask: Do you agree with the standards? LTN 1/20, 11.3 gives guidance on the quantity of cycle parking needed and Table 11-1 lists suggested minimum cycle parking capacity for different type of land use. LTN 1/20, 11.3.4 states that spare capacity should always be provided to cater for growth and turnover. Would other planning documents take this on board e.g. Travel Plans?	Thank you for your comments. The Council will make reference to LTN 1/20 in writing the next draft of the SPD.
Anonymous	Mostly agree, however some retail destinations have no short stay cycle provision for visitors who may wish to cycle to these destinations e.g. garden centres. Many are diversifying now and offer catering facilities. This would enable those who wish to cycle to such destinations the opportunity to do so and thus have many benefits to the economy, reducing pollution and well-being.	Thank you for your comments. The cycle parking requirement has been amended to clarify that provision should be made for long and short stay cycle parking, based primarily on development floorspace rather than number of employees. This approach is consistent with LTN 1/20.

Janet Hutchinson	Not entirely, as visitor cycle parking appears to have been missed from larger retail sites such as garden centres, builders merchants etc - clients should be able to cycle there to purchase smaller items or order larger ones for delivery. Need to ensure cycle parking is near the retail entrance/exit - secure and with surveillance. Also, instead of providing free parking (eg Durham city 'Free after 3') provide discounted bus tickets to incentivise modal shift.	Thank you for your comments. The cycle parking requirement has been amended to clarify that provision should be made for long and short stay cycle parking, based primarily on development floorspace rather than number of employees. This approach is consistent with LTN 1/20.
Peter M Aitken OBE	Yes.	Thank you for your comments.
Len Shield	Sections refer to GFA should it not be all floors especially on offices	Thank you for your comments. Gross floor area (GFA) includes all the internal floor space of a building, including upper floors.
City of Durham Trust	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.	Thank you for your comments. 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.
Paul Armstrong (Trust Pathways)	TP's response to 'destinations' are very similar for all the destinations in that providing too much car parking prevents take up of more sustainable forms of transport such as bus services, park and ride, walking and cycling. More emphasis needs to be made to encourage these sustainable options and make them real choices for all.	Thank you for your comments. The proposed standards take into account locations which are well served by public transport, and will enable more people to cycle by ensuring that the necessary cycle parking infrastructure is in place.
Sunny Ali (Highways England)	Highways England does not wish to make specific comment on the detail of the parking standards proposed for the various land uses. As part of planning submission reviews, Highways England generally advises that parking is a matter for the Local Highway Authority to satisfy itself with, unless it is considered that the intended provision could influence either (i) through over-provision: the attractiveness of making car-based trips or (ii) through under-	Thank you for your comments. The standards are intended to be applied as stated, not as minimum or maximums. This will be clarified within the text of the next draft SPD.

	provision: have negative operational consequences through parking off-site. It is not clear if the identified parking requirement is a defined level, a minimum or a maximum. This may benefit from definition.	
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**Table 4**

Question 4: Do you agree with the standards for employment destinations?

<b>Respondent</b>	<b>Comment</b>	<b>DCC Response</b>
Philip Timmins	Similarly to my comment above I think the balance is the wrong way round between car parking and other forms of transport for most types of employment destination. There needs to be a big emphasis on sustainable transport as the dominant form not as an add on in order to promote it and thus achieve the objectives outlined above in my Q3 comments.	Thank you for your comments. The proposed standards aim to enable people to cycle by providing the necessary infrastructure. However, adequate provision must also be made for car parking to prevent amenity issues arising from inappropriate parking.
Anonymous	Mostly agree expect for no provision of short stay cycle parking for visitors who may wish to cycle to these destinations. Visitors may be attending meetings at different locations within a City Centre and may want to cycle between locations. This would enable those who wish to cycle to such destinations the opportunity to do so and thus have many benefits; reducing pollution and improving the health and well-being of all. Also, it is noted that the floor area for Employment Standards has changed for car parking provision from 1 space per 25m <sup>2</sup> GFA to 1 space per per 18m <sup>2</sup> GFA. The reason for this change is not explained. Assume land space will accommodate for this? Durham County Council in 2019 declared a climate emergency and highlighted actions to reduce energy usage and CO <sub>2</sub> emissions one of which was reducing car use. Will allowing more car parking at employment destinations increase car use?	Thank you for your comments. The cycle parking requirement has been amended to clarify that provision should be made for long and short stay cycle parking, based primarily on development floorspace rather than number of employees. This approach is consistent with LTN 1/20. The requirement for car parking at offices and business parks intends to ensure that sufficient parking is required, however less parking can be provided where the site is in a sustainable location.
Peter M Aitken OBE	Yes.	Thank you for your comments.
City of Durham Trust	The Trust disagrees with these standards. The Trust has provided comparison with three other authorities in Appendix A. The maximum parking	Thank you for your comments. Officers will review the examples

	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.	provided and make changes where appropriate.
Len Shield	EV charging must be increased for hotels, persons travel to hotels and stay, therefor a greater need at the end of a journey tocharge the car and especially after 2030	Thank you for your comments. The proposed levels of EV charging aim to facilitate on-the-go charging whilst acknowledging that many people will charge at home or at an EV charging station.
Kelly Monahan	No. The proposed number of spaces is ridiculous. The vast majority of people drive	Thank you for your comments. The proposed standards aim to enable people to cycle by ensuring that necessary infrastructure is in place.
Janet Hutchinson	There should be 1 cycling space per 5 members of staff OR LESS. And there should be an aim to reduce the overprovision of car parking at existing large sites (plant trees!), with workplace parking levys introduced county-wide at large sites to support travel plan targets.	Thank you for your comments. The proposed standards aim to encourage cycling in the county by ensuring that the necessary infrastructure is in place.
Paul Armstrong (Trust Pathways)	See response to Q3.	Thank you for your comments. The proposed standards take into account locations which are well served by public transport, and will enable more people to cycle by ensuring that the necessary cycle parking infrastructure is in place.

Sunny Ali (Highways England)	Highways England does not wish to make specific comment on the detail of the parking standards proposed for the various land uses. As part of planning submission reviews, Highways England generally advises that parking is a matter for the Local Highway Authority to satisfy itself with, unless it is considered that the intended provision could influence either (i) through over-provision: the attractiveness of making car-based trips or (ii) through under-provision: have negative operational consequences through parking off-site. It is not clear if the identified parking requirement is a defined level, a minimum or a maximum. This may benefit from definition.	Thank you for your comments. The standards are intended to be applied as stated, not as minimum or maximums. This will be clarified within the text of the next draft SPD.
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**Table 5**

Question 5: Do you agree with the standards for leisure destinations?

<b>Respondent</b>	<b>Comment</b>	<b>DCC Response</b>
Kelly Monahan	No. Most people drive. I'd say you need more like 1 space per 1.5 people.	Thank you for your comments.
Len Shield	If the number of car spaces proposed for hospitals and doctors surgeries are the same as that for the University & Bishop Auckland hospital they are insufficient and must be increase. Pepole go to these places as they are ill and the car is the most health reason to use, if you are ill a bike will not be your chose	Thank you for your comments. Hospitals are typically located within more urban areas, where they are needed to support the population. However, this means that the space on any available site is likely constrained from the start. Problems with queueing and turnover are often down to the operation of the car park itself rather than the number of spaces provided. Furthermore, different hospitals will offer different services and these may change over time, so it is difficult to accurately predict how much parking will be required. The proposed standards have been informed by the Council's TRICS system which is informed by existing developments within the county.

Peter M Aitken OBE	Yes. Incidentally, there is evidence of cutting and pasting from a USA system.. Theatre is not spelled theater. DCC Parks are not mentioned, but I have a point to make here. Disabled parking should be free of charge. At Wharton Park in Durham time based charges apply. This means that disabled people pay more than the able bodied because it takes them longer to use the facilities due to mobility issues.	Thank you for your comments.
Anonymous	Mostly agree expect for no provision for short stay cycle parking for visitors. Users of gyms for example, may wish to cycle to these destinations from their place of work/residence.	Thank you for your comments. The cycle parking requirement has been amended to clarify that provision should be made for long and short stay cycle parking, based primarily on development floorspace rather than number of employees. This approach is consistent with LTN 1/20.
Janet Hutchinson	Cycle spaces for visitors seem to have been missed off many destinations and entirely missed off takeaways?	Thank you for your comments. The methodology used to calculate cycle provision is based on the number of staff or floorspace of each destination, however, the intention is that visitors should be able to use these facilities too. It would not be appropriate to provide cycle parking at hot food takeaways as this would lead to a proliferation of individual Sheffield stands and clutter streets.
Paul Armstrong (Trust Pathways)	See response to Q3.	Thank you for your comments. The proposed standards take into account locations which are well served by public transport, and will enable more people to cycle by ensuring that the necessary cycle parking infrastructure is in place.
Sunny Ali (Highways England)	Highways England does not wish to make specific comment on the detail of the parking standards proposed for the various land uses. As part of planning submission reviews, Highways England generally advises that parking	Thank you for your comments. The standards are intended to be applied as stated, not as minimum or maximums. This will be

	is a matter for the Local Highway Authority to satisfy itself with, unless it is considered that the intended provision could influence either (i) through over-provision: the attractiveness of making car-based trips or (ii) through under-provision: have negative operational consequences through parking off-site. It is not clear if the identified parking requirement is a defined level, a minimum or a maximum. This may benefit from definition.	clarified within the text of the next draft SPD.
City of Durham Trust	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.	Thank you for your comments. The standards have been drafted based on Durham's own circumstances using data relating to the County. It would not be appropriate to amend the standards based solely on the approach of other authorities.

**Table 6**

Question 6: Do you agree with the standards for other destinations?

<b>Respondent</b>	<b>Comment</b>	<b>DCC Response</b>
Anonymous	No. In the 2019 Standard, this stated '1 parking space per 5 members of staff', it now states '1 car parking space per member of staff'. There would be no incentive for car sharing or use of sustainable transport if the parking levels were so generous. Is this also the optimal use of land turning over so much to car parking? Even at less accessible locations, employers could support public transport options and this would result in reductions in traffic, pollution and greenhouse gas emissions. Would there be sufficient land space to accommodate that level of parking? Every opportunity to promote a shift to sustainable transport modes through the planning system should be considered.	Thank you for your comments. This standard will be amended to be consistent with the standard for primary and secondary schools for the next draft of the SPD.
Philip Timmins	Again I think there is considerable over provision for car parking especially when it is at one space per member of staff - it's highly unlikely this level of	Thank you for your comments. This standard will be amended to be consistent with the standard

	<p>provision will ever be needed even at current levels of car use - not all staff will drive to work and some will almost certainly not be at the site for a range of reason eg working elsewhere, holidays, sick, working at home etc. One of the objects of planning policy should be to reduce car use and reliance and to be replacing it with sustainable travel modes and excess parking provision does the opposite and is itself a very poor use of land. Furthermore the shift to working from home will mean less people being at places of work in the future.</p>	<p>for primary and secondary schools for the next draft of the SPD.</p>
<p>City of Durham Trust</p>	<p>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.</p>	<p>Thank you for your comments. This standard will be amended to be consistent with the standard for primary and secondary schools for the next draft of the SPD.</p>
<p>Len Shield</p>	<p>As yet I have never seen bike parks over used in Durham apart from the University sites</p>	<p>Thank you for your comments.</p>

Kelly Monahan	No. ALL doctors and dentists etc have cars. Most people drive. The proposed amount of spaces is woefully inadequate.	Thank you for your comments.
Janet Hutchinson	Colleges/Uni's cycle provision should at least match that of schools! 'School streets' should be encouraged along with CPZs to encourage active travel.	Thank you for your comments. This standard will be amended to be consistent with the standard for primary and secondary schools for the next draft of the SPD. Creation of school streets falls outside the scope of this SPD.
Peter M Aitken OBE	Yes.	Thank you for your comments.
Paul Armstrong (Trust Pathways)	See response to Q3.	Thank you for your comments. The proposed standards take into account locations which are well served by public transport, and will enable more people to cycle by ensuring that the necessary cycle parking infrastructure is in place.
Sunny Ali (Highways England)	Highways England does not wish to make specific comment on the detail of the parking standards proposed for the various land uses. As part of planning submission reviews, Highways England generally advises that parking is a matter for the Local Highway Authority to satisfy itself with, unless it is considered that the intended provision could influence either (i) through over-provision: the attractiveness of making car-based trips or (ii) through under-provision: have negative operational consequences through parking off-site. It is not clear if the identified parking requirement is a defined level, a minimum or a maximum. This may benefit from definition.	Thank you for your comments. The standards are intended to be applied as stated, not as minimum or maximums. This will be clarified within the text of the next draft SPD.

**Table 7**

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?

<b>Respondent</b>	<b>Comment</b>	<b>DCC Response</b>
Peter M Aitken OBE	Not sure about this one -ratio seems excessive. Is there user survey (potential and present) information available.?	Thank you for your comments. This standard will be amended to be consistent with the standard

	Bike racks necessary; these allow bikes to be secured thus minimising theft.	for primary and secondary schools for the next draft of the SPD.
Len Shield	I see no reason to dispute this and if it becomes obvious that additional secure bike space is required management should be able to adapt and increase.	Thank you for your comments.
Sunny Ali (Highways England)	As with car parking, Highways England generally advises that cycle parking is a matter for the Local Highway Authority to satisfy itself with. There may be benefit of reference in the SPD to Travel Plans as while the SPD may set the minimum requirement of cycle parking levels, the aims of the Travel Plan supporting a planning application should be factored in to ensure that the provision (greater than set out if necessary) is appropriate to supporting achieving these aims.	Thank you for your comments.
Paul Armstrong (Trust Pathways)	This is about right. It sends out the right message that cycling is being encouraged. A smaller number would suggest its more than a token gesture. A detailed Travel Plan would also accurately detail the current take up and that of the future if it is actively encouraged by the employers.	Thank you for your comments.
Philip Timmins	I support the requirement for cycle parking but I believe the number of cycle spaces should be as many as car spaces with a minimum of 2 per 5 staff. Furthermore the provision of changing / showering facilities should also be a requirement in reasonable proportion to the size and type of development as otherwise it can be difficult to cycle to work etc except over short distances.	Thank you for your comments. It would not be feasible to require equivalent cycle and car parking as this would lead to considerable oversupply of cycle parking. The proposed standard aims to provide the necessary infrastructure to enable people to cycle, without being excessive.  Whilst provision of showering and changing facilities in new development would be welcomed, it is beyond the scope of this SPD but should be addressed in any travel plan associated with a planning application.
City of Durham Trust	The Trust considers that a rate of one cycle parking space per 5 members of staff (20%) is rather too generous	Thank you for your comments. The proposed standard will enable people

	<p>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 Tool23 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. For sites in rural locations: 1. Where the distance to the</p>	<p>to cycle by ensuring that the necessary infrastructure is in place. The Council accepts that cycle parking is only one aspect of encouraging people to cycle, and cycle routes and upgrades to the network are being dealt with by other aspects of the Council's work.</p>
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	<p>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.</p>	
Heather Evans (Cycling UK)	See LTN 1/20 Table 11-1.	Thank you for your comments. The Council will make reference to LTN 1/20 in writing the next draft of the SPD.
Anonymous	The rate of '1 secure cycle parking space per 5 members of staff' seems reasonable given the Government's aspirations for increasing cycling levels. If employers are located in City Centres where it is hard to provide cycle parking on the premises, they should contribute to cycle parking facilities that can be shared with other employers and the public, perhaps by installing cycle racks in place of one or two on-street car parking bays.	Thank you for your comments. This would be determined on a case by case basis where cycle parking cannot be provided on site.
Kelly Monahan	It's excessive. Most people don't cycle to work because of the distance and because they don't want to be sweaty at work all day.	Thank you for your comments. The cycle parking requirement aims to enable people to cycle by

		ensuring that essential infrastructure is in place.
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**Table 8**

Question 8: Should all retail destinations have short stay cycle parking for visitors?

Respondent	Comment	DCC Response
Len Shield	Yes it gives choice and makes it inclusive for all visitors	Thank you for your comments.
Philip Timmins	Yes, it promotes business levels and reduces the demand for car parking	Thank you for your comments.
Janet Hutchinson	Yes, otherwise cyclists are discriminated against and modal shift is discouraged.	Thank you for your comments.
Heather Evans (Cycling UK)	Yes, see comments under Retail parking standards.	Thank you for your comments.
Sunny Ali (Highways England)	As with car parking, Highways England generally advises that cycle parking is a matter for the Local Highway Authority to satisfy itself with. There may be benefit of reference in the SPD to Travel Plans as while the SPD may set the minimum requirement of cycle parking levels, the aims of the Travel Plan supporting a planning application should be factored in to ensure that the provision (greater than set out if necessary) is appropriate to supporting achieving these aims.	Thank you for your comments. The next draft of the SPD will include reference to the role of Travel Plans in potentially limiting parking provision.
City of Durham Trust	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	Thank you for your comments. The cycle parking requirement has been amended to clarify that provision should be made for long and short stay cycle parking, based primarily on development floorspace rather than number of employees. This approach is consistent with LTN 1/20.

	<p>cycle parking is not. The Trust is not supportive of drive-through takeaway 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 nonresidential locations. The Cambridge Local Plan 2018 paragraphs L.16 to L.2724 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.</p>	
Paul Armstrong (Trust Pathways)	<p>Yes, all destinations without exceptions. We note that takeaways and café's were not included which is strange as cafes are most popular with cyclists.</p>	<p>Thank you for your comments. The cycle parking requirement has been amended to clarify that provision should be made for long and short stay cycle parking, based primarily on development floorspace rather than number of employees. This approach is consistent with LTN 1/20.</p>
Kelly Monahan	<p>Not many people cycle. I don't think much cycle parking is needed.</p>	<p>Thank you for your comments. The level of provision required aims to encourage cycling in the county by ensuring that necessary infrastructure to enable people to cycle is in place.</p>
Peter M Aitken OBE	<p>No. Excessive. Who would pay for this ?</p>	<p>Thank you for your comments. The proposed standards aim to encourage cycling in the county by ensuring that the necessary infrastructure is in place. The developer would fund this infrastructure.</p>
Anonymous	<p>There should definitely be short stay cycle parking for visitors at retail and leisure destinations. Table 3 does not require cycle parking for visitors at cinemas, theatres, pubs or restaurants, but these are all places</p>	<p>Thank you for your comments. The cycle parking requirement has been amended to clarify that provision should be made for long and short stay cycle</p>

	<p>that people might want to cycle to. There should also be some visitor cycle parking at offices. Again, at City Centre locations adequate public cycle parking would be acceptable, and developers could make contributions towards this. Regarding the siting of short stay cycle parking, the SPD does not specifically state locations. It is noted that 3.7 states 'cycle parking should be in a prominent location allowing regular casual observance and be covered, secured and enclosed, if intended for stays of an hour or more. For short stay cycle parking, Sheffield stands should be provided as a minimum'. There seems to be less guidance in the SPD rather than in the previous standard regarding the layout and spacing of cycle parking. Section 2.5.2.2 of the 2019 Standards included further information on the location and design of short stay cycle parking. Clear diagrams would also help. Could more detailed information therefore be included in the SPD?</p>	<p>parking, based primarily on development floorspace rather than number of employees. This approach is consistent with LTN 1/20.</p>
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**Table 9**

Question 9: Should 15% of all long stay parking spaces be set aside for electric vehicle parking at retail, employment, leisure and other destinations?

<b>Respondent</b>	<b>Comment</b>	<b>DCC Response</b>
<p>Sunny Ali (Highways England)</p>	<p>While not a direct consideration of Highways England, the level of provision of electric vehicle charging points should be reflective of the aspirations to switch to electric vehicles and the provision in the SPD should be considered against this ambition, with a view to the length of the Plan period. The SPD proposes a requirement for Electric Vehicle Parking and notes the national building regulations consultation, and this can be supported. These comments are made with a view to the provisions of NPPF which identifies that an adequate provision is made for spaces for charging plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.</p>	<p>Thank you for your comments.</p>

Anonymous	This would contribute to the future changes to the production of non-fuel vehicles and will enable a greater and earlier switch to EVs.	Thank you for your comments.
Paul Armstrong (Trust Pathways)	Given the current large uptake of EV's and also the bringing ealier the change to all EV manufacture by 2030 maybe this level should be increased to 20%.	Thank you for your comments. The proposed requirement has been drafted with the phase out of petrol and diesel cars in mind.  The requirement for passive EVCP provision has increased from 15% to 20% in car parks over ten spaces to fall into line with national building regulations.
City of Durham Trust	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.	Thank you for your comments. The next draft of the SPD will include wording around the appropriate charging speed for carparks with different levels of turnover.
Peter M Aitken OBE	Yes.	Thank you for your comments.
Kelly Monahan	No. Electric vehicles aren't that common.	Thank you for your comments. The aim of the proposed standards is to enable takeup of electric vehicles by ensuring that the necessary infrastructure is in place. The government will phase out sale of new petrol and diesel cars and vans by 2030.
Len Shield	I would increase to 25% with built in option for more as we move into 2030 electric vehicals	Thank you for your comments. The standard proposed is a minimum basic standard, the Council would be supportive of proposals to include a

		higher proportion of EV chargepoints.
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**Table 10**

Question 10: Are the minimum parking allocations for 1-2 bed, 3 bed, 4 bed and 5 bed appropriate for residential development?

<b>Respondent</b>	<b>Comment</b>	<b>DCC Response</b>
Peter M Aitken OBE	Yes.	Thank you for your comments.
Len Shield	For 2 and 3 bed house minimum car space with in curtalage must be not less than 2 spaces and preferably 3 for three bed houses. I have been on a great number of new housing estates and found that any less crests problems, also the use of narrow estate roads to slow traffic dose not work as cars park on narrow roads and cause obstructions for all road users . There must also be footpaths on both sides of access roads for pedestrians and wheelchair users. These paths have been omitted on estate road in recent years and must be reintroduced.	Thank you for your comments. The Council has reviewed the parking requirement on residential developments.  The Council agree that we need to increase the number of in-curtilage parking spaces on new residential dwellings. This will be reflected in the preferred options draft of the SPD.
Paul Armstrong (Trust Pathways)	County Durham is both rural and urban and standards need to take account of this. Those new dwellings in urban areas should have parking standards greatly reduced compared to new homes in more rural areas where longer distance cycling/walking journeys might be more difficult to encourage.	Thank you for your comments. It would not be appropriate to limit parking only in urban areas; this was the approach taken by PPG in 2000. It was found that this had no impact on car ownership levels and caused amenity issues due to inappropriate parking.
Philip Timmins	This policy is much too rigid and gives car use far too much priority. The policy should allow for parking place free developments, which have been successfully built on the continent and which make for a much higher quality of life on them due to the absence of cars to a large extent from the residential area.	Thank you for your comments. It would not be appropriate to limit parking at residential properties to encourage more sustainable transport. This policy approach was taken by the Council in response to Planning Policy Guidance 13 (Transport) in 2000. In practice, it was found that limiting parking at residential properties in the County, had no impact on car ownership levels and caused amenity issues due to inappropriate parking.

Janet Hutchinson	I am not sure a minimum standard for car-parking should be applied. Developers should be looking to move away from car-centric estates/streets, eg parking spaces for rent rather than automatically providing one, may mean higher density housing can be built (more efficient use of land) and incentivising a reduction in car ownership. HMOS should have higher allocations of cycle parking.	Thank you for your comments. It would not be appropriate to limit parking to encourage more sustainable transport; this was the approach taken by PPG in 2000. It was found that this had no impact on car ownership levels and caused amenity issues due to inappropriate parking.
Kelly Monahan	No. A 3 bed house can easily have 2 parents and 2 teenagers which is 4 cars. That's before you consider guests. I think you should expect a family to have at least 4 cars.	Thank you for your comments.  The Council agree that we need to increase the number of in-curtilage parking spaces on new residential dwellings. This will be reflected in the preferred options draft of the SPD.
City of Durham Trust	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 disappplied 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	Thank you for your comments.  Using minimum standards for residential parking standards reflects paragraph 108, which limits circumstances under which maximum parking standards can be set.  Providing ample parking on new residential estates for residents and visitors improves road safety and limits harm to residential amenity from parking on pavements and verges.

circumstances. The 2017 Durham City Neighbourhood Plan Consultation Draft25 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 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 nonstudent 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.<sup>26</sup> 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

	<p>developer can demonstrate it is appropriate, as well as encouraging a variety of levels of provision within a development. Paragraph L.727 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.</p>	
<p>Sunny Ali (Highways England)</p>	<p>Highways England does not wish to make specific comment on the detail of the parking standards proposed for the various land uses. As part of planning submission reviews, Highways England generally advises that parking is a matter for the Local Highway Authority to satisfy itself with, unless it is considered that the intended provision could influence either (i) through over-provision: the attractiveness of making car-based trips or (ii) through under-provision: have negative operational consequences through parking off-site. It is not clear if the identified parking requirement is a defined level, a minimum or a maximum. This may benefit from definition.</p>	<p>Thank you for your comments. The standards on destination sites are intended to be applied as stated, not as minimum or maximums. This will be clarified within the text of the next draft SPD.</p> <p>On residential sites, they should be applied as minimums but can be calculated across the site.</p>
<p>Anonymous</p>	<p>Noted that PBSAs are no longer referenced within the Residential Parking Standards of the Document. Received a separate response to advise that this will be reviewed.</p>	<p>Thank you for your comments. The standards do cover PBSA. More wording will be added to the next draft of the SPD to cover different types of student accommodation.</p>

**Table 11**

Question 11: Should garages be excluded from counting towards the parking requirement for residences?

<b>Respondent</b>	<b>Comment</b>	<b>DCC Response</b>
<p>Kelly Monahan</p>	<p>Yes. Nobody parks in their garage. It's used as a storage space.</p>	<p>Thank you for your comments.</p>
<p>Len Shield</p>	<p>Yes, as the houses are small and no stairage is provided that's there use , or build bigger houses.</p>	<p>Thank you for your comments.</p>
<p>Janet Hutchinson</p>	<p>Not sure. But there should be a minimum size standard that developers adhere to to ensure an SUV and secure cycle parking can be fit in a new garage. Owners who</p>	<p>Thank you for your comments. Planning permission is not required to convert garages into living</p>

	convert their existing garages into living space should HAVE to (via planning) provide secure storage elsewhere on the property (to fit a number of bicycles/mobility scooter etc) so as not to discourage subsequent property owners from choosing active travel modes.	space. This is according to national planning legislation.
Paul Armstrong (Trust Pathways)	Yes. This change is long overdue as garages are used for storage or are being adapted for more living space which may become more popular given the increase in home working.	Thank you for your comments.
Peter M Aitken OBE	No. Garages are multi-use spaces with many holding bulky items rather than cars - eg garden equipment, children's outdoor toys, bikes etc. Also, existing garages are sometimes converted into living accommodation at a later date - which under these proposals would leave no space at all for a car.	Comment noted. Garages would not be counted towards the parking requirement under the proposed standards.
City of Durham Trust	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	Thank you for your comments. Requiring garages to be a minimum size would be too onerous as they are not counted towards the parking requirement due to being frequently used for other purposes.  However, we will recommend that garages should be built to a minimum size.

	<p>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 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.</p>	
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**Table 12**

Question 12: Does one well designed visitor/non-allocated space per 4 dwellings provide the right flexibility for visitors and households with excess vehicles?

<b>Respondent</b>	<b>Comment</b>	<b>DCC Response</b>
City of Durham Trust	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.	Thank you for your comments. This is a recommended standard as the exact number of non-allocated spaces should be tailored to ensure that quality design solutions can be achieved on sites.
Len Shield	No , visitors will park on or next to the house to be visited as this tends to be humon nature	Thank you for your comments.
Janet Hutchinson	See rental comment at Qn 10	Thank you for your comments.

Paul Armstrong (Trust Pathways)	This sounds about right.	Thank you for your comments.
Sunny Ali (Highways England)	No comments submitted on this point.	N/a
Kelly Monahan	No. There should be at least 1 per dwelling.	Thank you for your comments. The level of provision suggested would be too onerous in terms of cost and space used.
Peter M Aitken (OBE)	No. It is unreasonable to expect that at any one given time only one visitor per 4 houses will arrive. I would at least double that allocation.	Thank you for your comments. The level of provision suggested would be too onerous in terms of cost and space used.

**Table 13**

Question 13: Should loose permeable materials be permitted for use as a driveway surfacing material?

<b>Respondent</b>	<b>Comment</b>	<b>DCC Response</b>
Kelly Monahan	Permeable yes, loose no. Bits end up all over the street and weeds grow in between. A loose surface is impossible to clean.	Thank you for your comments.
Len Shield	No, the surface to drives must be firm, tarmac or flags with run off to ground drainage. Paths and drives to the dwelling must be firm as above as this is safer and accessible for mobility impaired persons	Thank you for your comments.
Janet Hutchinson	I agree that driveways should be permeable to provide soakaway but not loose material to provide a hazard to pedestrians/cyclists. Residents with non-permeable driveways should retrospectively be made to provide soakaway areas nearby (eg strips of grass etc down the sides of the drive or fitted driveway drains flowing into soakaways in their garden) to prevent excess drainage into the public system.	Thank you for your comments.
Paul Armstrong (Trust Pathways)	No. There are cost effective alternatives such as permeable block paving which would enhance urban environments whilst giving the same performance.	Thank you for your comments.
Peter M Aitken OBE	Yes. There are plenty of types of material which help reduce water run-off and flooding.	Thank you for your comments.
City of Durham Trust	No, for the reasons given in the consultation document.	Thank you for your comments.

**Table 14**

Question 14: Should driveways be a minimum of 5m long and 2.7m wide, and should that apply to the driveway's entire length?

Respondent	Comment	DCC Response
Peter M Aitken OBE	Yes.	Thank you for your comments.
City of Durham Trust	<p>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</p>	Thank you for your comments.

	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 Arditti28: [images - see attachment] 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.	
Len Shield	Drives at 5m long is to short, minimum of 6m this slows access to front and rear of vehicle with out being on access road or public footpath . 2.7m wide is inadequate to get into and get out if the car with out crossing on to the garden and for the mobility impaired that has impairment	Thank you for your comments. The length of driveways will be amended to 5.5m in the next draft of the SPD.
Paul Armstrong (Trust Pathways)	The minimum width of a driveway should be 3 metres. 2.1m for the car and 0.9m for access which becomes more critical for visitors, deliveries and provides disabled access. AD Part M of the Building Regulations requires provision of suitable access for disabled people and this should requirement should be based upon this.	Thank you for your comments. Cars in the UK are on average around 1.8m wide, leaving adequate space to the side within the proposed 2.7m width to enter and exit the vehicle. A requirement for a specific proportion of development to be built to Building Regs M4 (2) standard is set out in Policy 15 of the County Durham Plan. The next draft of the SPD will cross reference Policy 15 for clarity.

**Table 15** - 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?

Respondent	Comment	DCC Response
Anonymous	Agree. This will encourage greater take up of sustainable travel.	Thank you for your comments.
Philip Timmins	Yes this should be a requirement and the space standard should be greater and in proportion to the size of property	Thank you for your comments.
Peter M Aitken OBE	Yes and yes.	Thank you for your comments.
Heather Evans (Cycling UK)	Definitely for cycles, but users need to have confidence that the cycle parking really is secure or they won't purchase a cycle. The type of cycle stands provided need to be easily useable and cater for all types of cycle.	Thank you for your comments.
Janet Hutchinson	I agree these should always be provided, and if home-owners develop a garage into	Thank you for your comments.

	living space then planning rules should stipulate that they must provide adequate secure storage place elsewhere on site.	
Kelly Monahan	Yes I think that sounds fine	Thank you for your comments.
Paul Armstrong (Trust Pathways)	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.	Thank you for your comments. It would not be feasible to require charging for scooters or ebikes to be provided at all new developments.
City of Durham Trust	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 <sup>29</sup> (Transport Initiatives LLP and Cambridge City Council, 2010) which is a very 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	Thank you for your comments. It would not be feasible to require charging for scooters or ebikes to be provided at all new developments. The proposed storage would be large enough to store four bikes, or a scooter or mobility aid.

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

	<p>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<sup>30</sup> (Wheels for Wellbeing, 4th ed., 2020) p. 54-61 covers the needs of cycle parking for disabled people.</p>	
Len Shield	<p>Yes but the house should be designed to a higher disability standard Yes for bikes to the house that is not fir the mobility impaired</p>	<p>Thank you for your comments. The requirement for housing to be accessible to people with disabilities or mobility impairments is covered under Policy 15 of the County Durham Plan, which requires a proportion of new housing to be built to building regulations M4 (2) standard.</p>

**Table 16** - Question 16: Should the appropriate enabling electrical cabling for a double-socket EV chargepoint be provided on all new residential properties?

<b>Respondent</b>	<b>Comment</b>	<b>DCC Response</b>
Len Shield	<p>Yes, a house may have a life span of 150 years and in 10 years only electric car to be sold no petrol or oil cars ,so it covers fir the future</p>	<p>Thank you for your comments.</p>
Sunny Ali (Highways England)	<p>While not a direct consideration of Highways England, the level of provision of electric vehicle charging points should be reflective of the aspirations to switch to electric vehicles and the provision in the SPD should be considered against this ambition, with a view to the length of the Plan period. The SPD proposes a requirement for Electric Vehicle Parking and notes the national building regulations consultation, and this can be supported. These comments are made with a view to the provisions of NPPF which identifies that an adequate</p>	<p>Thank you for your comments.</p>

	provision is made for spaces for charging plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.	
Anonymous	Yes where possible to allow for the charging of either an EV, motor scooter or e-bike.	Thank you for your comments.
Paul Armstrong (Trust Pathways)	Yes. Many companies are now offering the appropriate infrastructure to allow for faster charging at peoples homes and maybe developers should be encouraged to offer these in addition to the cabling.	Thank you for your comments.
Peter M Aitken OBE	Yes, otherwise Government intentions for universal EV use in the next 1/2 century will not be met.	Thank you for your comments.
Kelly Monahan	Yes. But one cable is insufficient. There could be 2-4 cars per house. People won't dig up their drives to retrofit cables.	One active EV chargepoint should therefore be provided for every new dwelling. The document recommends that a socket with 2 plugs be fitted where one is provided to allow charging of two vehicles at once.
City of Durham Trust	Yes, absolutely. The Trust would like to see further criteria 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.	Thank you for your comments.  The issue of on-street chargepoint provision is being dealt with separately by the Council. The Council are considering the use of licensing and appropriate guidance for those residents that want to charge on street.
Janet Hutchinson	Yes, new developments must be future-proof. And some households may have to charge a mobility aid as well as a vehicle.	Thank you for your comments. The requirement

		<p>for parking suitable for disabled people to be provided is covered under Policy 15 of the County Durham Plan, which requires a proportion of new housing to be built to building regulations M4 (2) standard. This will be cross-referenced in the next draft of the SPD for clarity.</p>
<p>Homes England</p>	<p>I would firstly like to thank you for the opportunity to comment on the aforementioned document, which has been published for comments until 26th February 2020. Homes England has extensive land interests across Durham County in the following locations: Merrington Lane; Seaham Colliery; and Peterlee NEIE Homes England wishes to thank the Council for the opportunity to comment on this draft document, which is intended to give further guidance and be used by developers and officers on matters relating to parking and accessibility requirements. Homes England is the government's housing accelerator. We have the appetite, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities. Our ambition is to create new neighbourhoods and healthy residential environments that are well planned, respond to the context of their surroundings, complementing the local character or forming a distinctive character of their own and, most crucially, serve the practical needs of their communities. We are committed to working with housebuilders, local planning authorities, developers, landowners, MHCLG and the wider housing industry to promote better designed and higher quality homes, challenge orthodoxy and build better homes, faster. This includes working collaboratively to make sure that the delivery of transport and other infrastructure is aligned with delivery of housing. Homes England recognises that it is important to identify and provide new housing on sites that are close to high quality and sustainable transport environments, in order to allow people to live and move around places safely, with ease and with transport choices. It is understood that a key part of doing this is to provide appropriate levels car parking and inclusive</p>	<p>Thank you for your comments. One active EV chargepoint should therefore be provided for every new dwelling. This is now being mandated by the government following a consultation response which was released in November 2021. The consultation response is available <a href="#">here</a>. The consultation response outlined that 77% of all respondents to a 2019 consultation agreed that all new residential dwellings should include the provision of an 'active' chargepoint</p>

environments, as part of projects, to address the modern car ownership demands of new residents and all users, as well as encourage sustainable travel options, as and where appropriate to do so. Thus, helping to respond to the long-term challenges facing the country. OFFICIAL Residential Parking Standards - Electric Vehicle Charging Points Section 4. of the SPD sets out the Council's proposals in relation to 'Residential Parking Standards' and car parking ratios that will be applied to new dwellings (Table 5: Residential Parking Standards). Homes England does not intend to comment on the proposed car parking ratios and requirements in extensive detail, however, we would like to take this opportunity to highlight a number of items in relation to expected provision of electric vehicle (EV) chargepoints in new residential developments. As proposed, a ratio of at least 1 EV chargepoint per new dwelling will be applied and, as a minimum, they will be expected to be provided as passive chargepoints (i.e. suitable cabling which will allow a chargepoint to be installed at a future time) in recognition of the costs of providing such equipment. Where an active chargepoint is proposed, it is expected that two sockets be included to allow provision for households with multiple vehicles/or visitors. The SPD highlights that the cost of installing one passive chargepoint will be an estimated £453 per dwelling and that an active charge will cost £976, which is consistent with the Department for Transport's 2019 advice.<sup>1</sup> Firstly, it is confirmed that Homes England supports the provision of EV charging points in new homes wherever it is appropriate to do so. It is necessary to help future proof homes for the transition to electric vehicles to help ensure we make the shift to net zero greenhouse gas emissions and support the government's strategies that seek to achieve this. As drafted, however, we consider that the current requirement may prove too rigid because the proposals do not currently appear to take into account situations where the provision of EV charging points may not be technologically feasible due to other prohibitive issues, such as development viability or site layout constraints / circumstances. Indeed, it is necessary to ensure that the introduction of this requirement does not add such a burden on developers that certain developments become unviable. Presently, the provision of EV charging points is a significant additional cost for a development. Whilst the benefits of supporting a transition to low carbon transport is undisputed, it is considered that the proposals should be amended to allow for flexibility at sites where overall development viability is marginal. For example, on a site of 200 units, such provision would amount to an additional cost of between almost £100,000 - £200,000 depending upon the equipment proposed. Furthermore, it is also often necessary to upgrade the infrastructure at a site (e.g. cabling) to allow it to cope with the additional

demand on the electricity supply and ensure that there is not an overload for a new development and, potentially, the surrounding local area. In addition to cost constraints, there can also be physical factors associated with a site layout that can sometimes prevent the delivery of EV chargepoints. Private services should not cross a public footpath or land in other ownership, and so this can prevent the provision of charging points where parking spaces are located away from the dwelling. For example, where parking is proposed to the rear of corner plots no electricity is available as it is detached from the unit itself or where parking is located at the end of a turning head and would require cables to cross the footpath to provide a charging point. In light of the above, Homes England requests that consideration be given to a more flexible approach to the EV charging requirements. As such, it is recommended that the SPD includes an exemption for buildings / developments where it is proven not to be technologically feasible or viable to include an EV chargepoint. Such exemption should be supported by a technical feasibility criteria (in line with recommendations of The Department for Transport's draft proposals<sup>1</sup>) which sets an appropriate threshold trigger for the exemption to ensure that developments only be exempt where it can be demonstrated that it is either not practically feasible or that the installation of chargepoints would result in developments not being taken forward as a result of this cost. By introducing this exemption criteria, it is hoped that an appropriate balance be achieved that ensures that the expectations are mindful of the government's net zero emission commitments, as well as the housing supply commitments. <sup>1</sup> DFT (July 2019). Electric Vehicle Charging in Residential and Non-Residential Buildings. Source: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/818810/electric-vehiclecharging-in-residential-and-non-residential-buildings.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/818810/electric-vehiclecharging-in-residential-and-non-residential-buildings.pdf) OFFICIAL Summary Homes England supports the provision of EV charging points in new homes and does not dispute the need to transition to a low-carbon future, however it is recommended that due consideration needs to be given to situations where it may not be possible to provide a charging point for every property due to site constraints or development viability. Thus, achieving balance between net zero emission and housing supply commitments. As such, it is considered essential that the content of the SPD be amended as suggested in this representation to allow more flexibility to respond to such circumstances. We trust that these comments on the 'Parking and Accessibility SPD: Issues and Options Consultation 2020' will be taken into account and used to assist with the progression of the document. We look forward to continuing to engage with you and consider any further consultation requests, as appropriate.

**Table 17 - Miscellaneous comments**

Respondent	Comment	DCC Response
Stewart Patience (Anglian Water)	<p>The following comments are submitted on behalf of Anglian Water (who own Hartlepool Water).</p> <p>Durham County is located outside of Hartlepool Water's area of responsibility. We serve neighbouring Hartlepool but not Durham County. As such we have no comments to make relating to the current consultations</p>	Thank you for your comments.
Jacqui Salt (Natural England)	<p>Thank you for your consultation on the above dated 15 January 2021, which was received by Natural England on 15 January 2021. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature. Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again. Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. Please send all planning consultations electronically to the consultation hub at <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>.</p>	Thank you for your comments.
Jim Welch	<p>Disabled Parking The problem you have when someone parks on the pavement is the overhang of the vehicle can cause an obstruction and people can walk into them. Clear Signage for disabled parking is very important. Bus stops There is a navigational apps that can tell you where the next bus stop is and how far it is away. It also tells you of the relevant</p>	Thank you for your comments.

	<p>shops and businesses nearby. I agree with the Destination for Parking spaces and retail spaces. If people who are capable of using navigational applications on smart devices, they could view the parking situation and other relative information before starting out on the journey. They may also be able to find out alternative parking as well.</p> <p>Employment Parking Standards It is not easy to read and understand, especially in the dimensions of parking spaces. Leisure Parking Standards The considerations of employees should come first and more consideration for cycle parking and security.</p> <p>Other desination parking standards It is very difficult to comment as I cannot visualise the sizes being referred to. Cycle parking I agree with the Sheffield stands for short term parking and should also be built so if need be can be easily extended. I would like to see more CCTV coverage over the cycle stands, then people would have more confidence in using their cycle to go to work or leisure. Electric Vehicles It is a good idea, but also it must be on how many employees have an electric vehicle as otherwise you could end up with spaces not being used. Residential Garages should be classed as parking areas. The standard size of a garage should be increased. The minimum allocation is not adequate. Certain parking areas for residents should be for residents only. Non residential parking Any new planning applications for building plots, separate visitor slots should be considered. The reason for this is that some disabled people who have walking problems cannot park their car close to their own home. Driveway Standards I agree that they shouldn't be using any loose materials. I think that the driveways should be longer to avoid bigger cars/suv's sticking out over the edge and onto the pavement. Cycle, Mobility Scooter, and Motorbike Storage I agree with the storage and the size of the space. EV Charging Yes I agree with that. What consideration are given to people that live in rural areas using electrical vehicles. General Comments More awareness, publicity and information to motorists who park on pavements not leaving enough room for wheelchairs and pushchairs to get through. More consideration needs to be given to service vehicles who need to access property where parking on both sides of the road leaves no room for service vehicles to access.</p>	
Henry Cumbers (Historic England)	<p>Thank you for consulting Historic England on the consultation on Issues &amp; Options Parking Standards Supplementary Planning Document.</p> <p>Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage</p>	Thank you for your comments.

	<p>Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.</p> <p>Historic England has no representations to make on the SPD at this stage.</p> <p>If you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.</p>	
Melanie Lindsley (The Coal Authority)	we have no specific comments to make.	Thank you for your comments.
Bishop Auckland Cycling Club	<p>Generally, we support the proposals suggested in this consultation document. However, we do have the following comments 1) If there are fewer than 5 employees, will there still be 1 cycle parking place? We represent that there should be, and the wording should reflect this. 2) While not parking itself, if standards are being applied for cycle parking in respect of employees, consideration needs also to be given to showering and changing provision for them. There is reference to this in the Strategic Cycling and Walking Delivery Plan but a reference to appropriate standards in a Planning Document would also be welcome 3) Is there any reason why customers are not mentioned in relation to parking places at pubs, restaurants or cafes? Many cafes in rural areas in fact are popular with cyclists. 4) Is there any reason why hot food takeaways should be exempt from providing cycle parking? 5) In relation to fitness clubs and places of worship, how is it proposed to calculate the number of visitors? As it is proposed to be 1 space per 5 visitors, this could be critical. 6) We note no provision is made for cycle parking for visitors to cinemas. Is there any reason for this? 7) 1 space per 50 students seems a low ratio for further educational establishments. Surely students are the very people to be encouraged to cycle? 8) The provision for primary and secondary schools is better at 1 per 20 pupils but surely this is not ambitious either. 9) With regard to paragraph 3.7 Cycle Parking, we represent that - the difference between long and short stay parking should be made clearer (is 1 hour definitively the dividing line). - Some visitors are likely to stay at premises for more than 1 hour (eg fitness clubs). Is there to be no provision for such longer stays? - As far as Sheffield Stands are concerned, it is also necessary to consider their location. Stands should be placed where they can be easily used and not too close to obstructions, including walls. There are cases where</p>	<p>Thank you for your comments. The Council's view is that there would be no justification to require businesses with fewer than five employees to provide cycle parking as it would be too onerous a requirement. Similarly, 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. Whilst provision of showering and changing facilities in new development would be welcomed, it is beyond the scope of this SPD but should be picked up in any travel plan associated with a planning application. The cycle parking requirement has</p>

	<p>a stand is placed so that it is almost impossible to park a bike because the stand is too close to a wall. - In addition, when siting Cycle Stands, consideration needs to be given to any problem they may cause to partially sighted and disabled. I have just attended the Webinar arranged by the Council today that included a section on Cycle Parking and represent that this be considered as part of the consultation in preparing this important framework to encourage more people to cycle.</p>	<p>been amended to clarify that provision should be made for long and short stay cycle parking, based primarily on development floorspace rather than number of employees. This approach is consistent with LTN 1/20. The parking requirement at further education establishments will be amended to match that of primary and secondary schools. The requirement for cycle parking to be based on visitor numbers will be reviewed before the next draft of the SPD is produced. The definition of a short stay cycle parking space will also be changed to one which is used for two hours or less.</p>
<p>City of Durham Trust</p>	<p>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<sup>1</sup> 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<sup>2</sup>, '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</p>	<p>Thank you for your comments. The Council has not pursued maximum parking standards in this document as they cannot be justified in Durham per NPPF paragraph 106, and as they have been shown to cause amenity issues when pursued through national and local policy in previous years. The SPD instead aims to encourage use of more sustainable options such as</p>

	<p>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<sup>3</sup>, which reinforces the 2020 DfT report Decarbonising transport: setting the challenge<sup>4</sup> 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. <sup>1</sup></p> <p><a href="https://www.theccc.org.uk/publication/sixth-carbon-budget/">https://www.theccc.org.uk/publication/sixth-carbon-budget/</a> <sup>2</sup> Travel behaviours are the key to engineering net zero (Tony Meehan, February 2021, Local Transport Today)</p> <p><a href="https://www.transportxtra.com/publications/local-transport-today/news/68067/travel-behaviours-are-the-key-to-engineering-net-zero">https://www.transportxtra.com/publications/local-transport-today/news/68067/travel-behaviours-are-the-key-to-engineering-net-zero</a> <sup>3</sup></p> <p><a href="https://road.cc/content/news/govt-wants-half-urban-trips-walked-or-cycled-2030-280667">https://road.cc/content/news/govt-wants-half-urban-trips-walked-or-cycled-2030-280667</a> <sup>4</sup></p> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf</a></p> <p>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<sup>5</sup> calculates that County Durham's share of the UK's remaining carbon dioxide emissions budget is 16.6 million tonnes (MtCO<sub>2</sub>) 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</p>	<p>walking, cycling, and public transport use, whilst ensuring that sufficient parking is provided.</p>
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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 Commitments 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<sup>6</sup> 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/MillardBallWestRezaeiDesaiSFBMRUrbanStudies.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<sup>7</sup> 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)<sup>8</sup> 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-](https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Transport/car_parking_standards_december_2015.pdf)

[Base/Transport/car\\_parking\\_standards\\_december\\_2015.pdf](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 nonresidential 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<sup>9</sup>. 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.

<p>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<sup>10</sup> 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</p>	
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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](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 â€¦ 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<sup>11</sup> (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<sup>12</sup> 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<sup>13</sup> 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<sup>14</sup> 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](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](https://www.bathnes.gov.uk/sites/default/files/parking_strategy_technical_report.pdf) 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 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

	<p>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 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. <a href="https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf">https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf</a> maximum distances from developments to bus stops and designated cycle routes must be specified for new developments &amp; spine roads through large developments wide enough for buses '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"</p>	
<p>Overview and Scrutiny</p>	<p>Need to consider parking provision at hospital sites within the County. Regular queues for visitors and limited parking for staff with example given as the parking provision at the University Hospital of North Durham.</p> <p>Need to consider the parking allocation at some retail parks for specific businesses as they seem very generous with an example given as large DIY stores.</p> <p>Need to reduce congestion at schools during the identified peak times, the beginning and end of the school day. Where parking measures operate such as maximum stay or various initiatives such as free parking, there is flexibility for them to be reviewed/changed to ensure turnover.</p> <p>Need to be adequate signage particularly in our town centres ensuring the residents and visitors can</p>	<p>Thank you for your comments. Hospitals are typically located within more urban areas, where they are needed to support the population. However, this means that the space on any available site is likely constrained from the start. Problems with queueing and</p>

	<p>identify where parking provision is located including cycle parking provision.</p> <p>Support for the proposals for safe and secure cycle parking particularly in our town centres and that cycle parking is provided at all destinations (a recognition of the health benefits resulting from cycling and its increased popularity as a result of the pandemic). Need to ensure that all DCC buildings have adequate disabled parking provision at least a minimum of 2 bays or 5 % of bays in car parks of 20 spaces or more. However, DCC should aim to exceed these minimum requirements where possible.</p> <p>Need to ensure that where possible GP surgeries have at least the minimum disabled parking requirements available and where new surgeries are planned more than the minimum disabled parking requirements should feature in the design proposals. Suggestion made that going forward we need to consider how we monitor parking and accessibility provision in the county and that parking and accessibility in relation to retail should feature within the Town Centre Surveys.</p>	<p>turnover are often down to the operation of the car park itself rather than the number of spaces provided. Furthermore, different hospitals will offer different services and these may change over time, so it is difficult to accurately predict how much parking will be required. The proposed standards have been informed by the Council's TRICS system which is informed by existing developments within the county. The parking requirement at DIY stores is intended to accommodate demand at peak visiting times such as weekends and bank holidays. Management of school parking and signage is beyond the scope of this SPD. The standards are to be applied equally across the county. GPs are welcome to include a higher proportion of disabled parking if they think it would be appropriate but as they generally have constrained parking provision due to being located in built up areas it would not be appropriate to raise the minimum requirement over 20%.</p>
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<p>Julie Kirkley (Bird's Taxis)</p>	<p><b>Disabled Parking Standards</b> Clear signage of where disabled spaces are &amp; height of signage and colour to be able to see and identify when enter car parking area. As well as area for standard vehicles there also should be a minimum about of dedicated spaces for adapted minibuses with longer wheelbases and width &amp; also to take into account the extra length of allocated space to allow the safe deploy of a tail lift and also for some one in a wheelchair safe space to disembark to paved area. Possibility of lighting of these area dusk/night time for safety and security &amp; as not to waste power possibility of a trip switch action when vehicle pulls in it activates lighting when pulls out the lighting ceases for cost effectiveness. Also more long term and future an alarm sensor fitted so can be activated in an emergency. Soft astro turf like surfaces in case slips falls and could be in a total different colour to black to indicate dedicated parking areas and visibility. Clear defined walking area as not to obstruct into other parking areas with traffic which may cause an accident or incident.</p> <p><b>Cycle Parking</b> Clear defined areas possible away from standard car parking area for safety obstructions or conflict from sides. Covered areas to protect cycles from weather elements &amp; free lock in system for security and to encourage people to use cycles. Dedicated spaces for electric cycles " possible individually charge point and space to do this. Clean areas " possible marketing opportunity to let public know how and what effects on environment and health style. Area for adult and child cycles together to promote family awareness and possible eventually some reward system for children to encourage to do it again " possibly link with supermarkets etc i.e. TESCO with the community. Effectively if going to promote cycling and a clean environment and move forward then would anticipate would need more than a five space lockable cycle area. ^ Electric Vehicle Charging Points ^ In all areas needs to be a dedicated disabled charging bays wider and longer to accommodate also again minibuses in the future need to be considered and all the safety aspects of the person safety when leaving the vehicle.</p> <p>^ Electric Vehicle Parking Spaces ^ I feel stimulating 15% designed parking space form electric vehicles seems a little discriminating at this moment in time as there is still a very large % of other vehicle types on the road therefore there should be no restrictions on where any of these vehicles park " especially when specific charging points are being installed to accommodate electric vehicles and in lots of instances easier accessible than petrol areas. ^ Minimum Parking Allocation for</p>	<p>Thank you for your comments. It would not be feasible to require minibus parking in all car parks. Issues such as signage within car parks and the location of cycle parking relative to car parking is a matter for the car park operator. The Council has reviewed its methodology regarding parking at residences and these standards will be amended in the next draft of the SPD. Regarding EV parking, only 5% of bays would contain an active chargepoint with a socket under the proposed standards, with an additional 10% to be fitted with cabling so that they could be more easily converted to include an EV chargepoint in the future, once a greater proportion of vehicles on the road are EVs.</p>
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<p>Heather Evans (Cycling UK)</p>	<p>General Was LTN 1/20, (published in July 2020), Section 11 referred to when drafting the sections that relate to cycle parking? If not, please can this be referred to as we have made several references to this document below. LTN 1/20 also refers to cycle parking for cyclists with a disability and those using non-standard cycles.</p> <p>Electric car vehicle charging is mentioned under 3.5, 3.8 and 4.12. Should E-bike charging also be mentioned? We don't know how practical this is (cables may need to be carried) and there may be several different methods of charging E-bikes.</p> <p>Cover photos There's a photo of a cycle locker but there is no reference to lockers in the document.</p> <p>Introduction 1.2. We welcome the Planning Inspectors recommendation that this document should be given greater status. 2.1. Parking Provision for Disabled Persons LTN 1/20 refers to disabled cyclists under 11.2.1 , 11.2.3, 11.2.6, 11.3.2. 2.6. 5th bullet. Dropped kerbs also need to be fully flush (max 6mm) and these may also be needed to allow cyclists easy access to cycle parking.</p> <p>Destination Parking Standards Table 1: Retail Parking Standards DIY Stores are mentioned under Bulky Goods. B&amp;Q sell many goods that can be transported by cycle. Cyclists may also prefer to cycle to a store/builders merchant, purchase bulky goods and then arrange for these to be delivered. There is also no reason why a car sales room can't be visited by cycle. Gardens Centres often have cafes which are popular with cyclists, and again they sell small goods. The area surrounding a garden centre is often planted up making it difficult to find anything to lock a cycle to.</p> <p>Table 2: Employment Parking Standards Employment sites need visitor spaces unless staff cycle parking is suitably located and easily accessible to visitors. Table 3: Leisure Parking Standards Hotels/Motels &amp; Guesthouses. As cycles are parked overnight storage needs to be</p>	<p>Thank you for your comments. The Council will make reference to LTN 1/20 in writing the next draft of the SPD. The cycle parking requirement in some cases has been based on staff numbers, however this is not intended to prevent visitors from also using this provision.</p>

	<p>undercover, and also secure otherwise cycle insurance policies will be invalid. Being able to leave cycles in a room inside the building is always preferred. Caravan &amp; camp sites. If weather is poor cyclists would tend to look for somewhere dry and secure to leave their cycle overnight, rather than just leaving it locked outside their tent or caravan. Other locations mentioned. As a cycle can be used to visit all of these, especially cafes, visitor cycle parking is needed. This is especially important where there is nothing suitable/convenient to secure a cycle too. Being able to see a cycle whilst in a cafe is also welcomed, especially when on tour with a laden cycle.</p> <p>Table 4: Other Destinations Hospitals/Doctors/Residential Care Homes. Is the short stay space per 5 consulting rooms meant for visitors? If not visitor cycle parking is needed unless staff cycle parking is easily accessible to visitors. Community Centres. It's not clear who this is for, staff or visitors, although cycle parking suitable for all users is needed.</p> <p>3.1. Cycle Parking There is a photo of a shelter with Sheffield stands where the base plate joining the stands appears to be raised rather than being fully flush to the ground. Cycles don't rest well on raised plates. It also looks as though cycles can't be parked on the outer two stands due to lack of space. See LTN 1/20, 11.4.6, 11.4.7 and Table 11-2 (Recommended and minimum dimensions for banks of Sheffield stands). LTN 1/20, Figure 11.1 indicates the relationship between cycle parking duration of stay, location and ancillary facilities. Often visitor cycle parking is placed much further away from a building's entrance than car parking. Accessibility 2.6, 1st bullet point says that disabled persons bays should be the nearest bays to a building's main entrance. Could a similar statement be included with regard to the location of cycle parking, especially for visitors, as this would also cater for cyclists with a disability? Could Figure 11.1 and Table 11-2 be included in the document?</p>	
<p>Maya Polenz (Durham Cathedral)</p>	<p>Thank you for inviting our views as part of the public consultation. As you acknowledged during the public consultation event, the proposals are mainly aimed at new developments outside historic city centres. It was reassuring to hear that you are fully aware of the special status of the Durham World Heritage Site (WHS) and that you have no intention to apply the rules set out in the proposed document verbatim to the WHS area. We believe our joint desire to protect the WHS must be explicitly stated within the proposed document in order to avoid any misunderstanding of your intentions and any potential challenges to decisions made by the local authority 'on merit' and not conforming to the</p>	<p>Thank you for your comments. The definition of an accessible location aims to set a minimum standard for accessibility by public transport which should be met for new development to offer less car parking provision. It is not intended to</p>

	<p>currently set out minimum requirements. Areas of particular concern are: - Definition of accessible location. At present, parts of the WHS would fall outside the definition as some parts are more than 400m away from a bus stop, and bus services are infrequent at times. The whole WHS should be explicitly stated as an accessible location. - Destination parking standards. Separate standards have been set for each destination: retail, employment, leisure, other destinations. Durham Cathedral's Precinct serves all of these sectors but would not be able to accommodate these standards without undue impact on the historic environment. In the consultation event you confirmed that car free development would be considered within the Durham City Congestion Charge Zone but this isn't stated in the draft proposals. State the intention to consider car free development within Durham City Centre. - Cycle parking in accessible areas. The steep cobbled access roads bring little joy to cyclists. Accommodating a very large number of cycle storage within the historic environment of the WHS would be challenging and is unlikely to be required to the proposed extent. - The reality of the local topography and historic environment should be taken into account when determining numbers for cycle storage. Locations for secure storage should be identified strategically (i.e. some at the foot of the hill?). The proposed designs for secure cycle storage seem inappropriate for the WHS. Designs for areas within WHS to be reviewed with the assistance of the WHS Committee.</p>	<p>comment on accessibility within the development itself.</p>
<p>Ross Chisholm</p>	<p>I would like to suggest that pubs, guest houses and cafes be required to provide cycle parking facilities for visitors. I am a cyclist and enjoy cycle touring holidays, day leisure rides and trips to specific venues. Cycling to these uses should be encouraged in both countryside and urban locations.</p>	<p>Thank you for your comments. The standards as drafted include cycle provision for guests at hotels and guest houses. Though the SPD calculates the cycle parking requirement for cafes and pubs based on the number of employees, the intention is that visitors will also be able to use these facilities. Additional wording around this issue will be added to the next draft of the SPD to clarify this point.</p>

If you require any further information on this document, please contact the Spatial Policy Team: Telephone: 03000 260000 Email: [Spatialpolicy@durham.gov.uk](mailto:Spatialpolicy@durham.gov.uk) Post: 'FREEPOST Spatial Policy' (please note no further information is required)