

# 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 (May/June 2022)

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 in May/June 2022.

## 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.

### Question 1

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

Respondent	Comment	DCC Response
<b>Belmont Parish Council</b>	While not disagreeing with the principle, the definition as described in 2.13 requires modification. For elderly residents and those with restricted mobility, 400m to a bus stop is a lengthy walk. This should be no more than 200m. Certainly there should be at least two buses per hour during peak periods but in Durham a 6pm evening watershed is rather early. Given the intention to develop the night time economy this should be extended to 10.30pm.	<p>400m is the distance recommended by the Chartered Institute of Highways and, see Pg. 31 of guidance below:</p> <p><a href="https://www.ciht.org.uk/media/4465/planning_for_walking_-_long_-_april_2015.pdf">https://www.ciht.org.uk/media/4465/planning_for_walking_-_long_-_april_2015.pdf</a></p> <p>The 400m distance is the recommended distance to consider whether a site is accessible by public transport. This allows planning officers to reduce the required parking at destinations.</p> <p>Appreciate some people will always have mobility issues. However, the parking SPD requires a minimum of two bays for people with disabilities on new development sites at destinations. On larger development sites, a minimum 5% of car park bays should be provided for disabled people in car parks of 20 spaces or more.</p>
<b>Matthew Philips- on behalf of John Lowe Durham City Trust</b>	As acknowledged in paragraph 1.9 of the consultation document, the County Plan Inspector considered that maximum parking standards at destinations should be implemented in accessible locations. Despite this, the proposed SPD applies standards equally across the county, and under each table it is stated that the standards are neither maximum nor minimum standards. If the standards are to be "applied as stated", to quote the Council's response to Highways England's consultation response, then the SPD does not meet the Inspector's requirement that maximum parking standards should <b>be applied to accessible destinations</b> .	<p>The Inspector requested that principles of the SPD 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.</p> <p>The NPPF, para 107 is clear that ' Maximum parking standards for residential and non-residential development should only be set where there is clear and compelling justification'</p>

	<p>The Council has instead devised standards that apply across the county, even in the most inaccessible locations, and are intended to be “sufficient to provide for the needs of the development” (para. 3.1). It proposes that accessible locations will be considered case by case, which implies that no specific policy will apply in such locations. The Trust's view is that the possibility of “flexibility” in accessible locations does not go far enough: the standards should <b>require</b> a lower rate of car parking provision in accessible locations. As noted by Highways England in their submission to the previous consultation, over-provision of car parking can make car-based trips more attractive. All previous Durham County Council Parking and Accessibility Standards over the last two decades have included explicit lower levels of provision to be applied in town centres. Why, when expressly directed by the Planning Inspector to set maximum parking standards at accessible destinations, has the proposed SPD abandoned this approach in favour of a case-by-case analysis?</p> <p>The Trust would like to understand how the case-by-case guidance will be delivered. If it forms part of pre-application advice for applicants, will the guidance and evidence also be published by the County Council when an application is submitted? If it is to be based on TRICS data, will the surveys selected include those from comparable sites across the country, rather than being restricted to Durham examples?</p> <p>Will the rate of provision be designed to further the aims of any Travel Plan and the need to decarbonise transport through modal shift?</p>	<p>When applying this test, it is not obvious that the clear and compelling evidence to apply maximum parking standards existed in County Durham towns. Therefore, the Council proposes a definition of accessible locations where individual officers can restrict parking at destinations.</p> <p>Where developments are 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.</p> <p>The SPD leaves the exact figure of reduced parking in accessible locations to appropriate professional case officers but judgments should be made with reference to the accessibility guidelines in section 2.</p> <p>Although it is impossible for a countywide definition of adequate accessibility for walking and cycling, it is now important to cross reference the LCWIP framework in the SPD.</p> <p>The need to reference walking and cycling to make developments more sustainable was referenced by the Inspector in his final report on the County Durham Plan. It is also part of CDP Policy 21 and has been raised in representations from National Highways and the City of Durham Trust.</p> <p>DCC now have 3 LCWIPs adopted, with another 9 in the latter stages of development. This is an important reference in the SPD as it establishes the LCWIPs (in conjunction with policy 21 of the County Durham Plan) as a tool that decision makers could use to reduce parking at destination development sites.</p> <p>In accordance with Policy 21 of the County Durham Plan, Development Management and Highway Officers</p>
--	---	---

		<p>will draw on a range of evidence submitted with the planning applications inc. Travel Plans, Travel Statement and Transport Assessments as well as the proposed parking guidelines in section 2 before forming a judgment on appropriate levels of car parking at a particular site.</p> <p>Policy 21 of the County Durham Plan also states that development should deliver sustainable transport by giving priority to safe sustainable modes of transport. The following order of priority should be given when considering safe sustainable modes: those with mobility issues or disabilities, walking, cycling, bus and rail transport, car sharing and alternative fuel vehicles. All development should also have regard to the County Durham’s Strategic Cycling and Walking Delivery Plan and the LCWIPs.</p>
	<p><b>Accessibility of sites by public transport</b> Previous Parking and Accessibility Standards have included phrasing to the effect that no residential property shall be more than 400m from a bus stop (e.g. 2019 edition, para, 2.7.3).</p> <p>The draft SPD contains no such wording, but instead uses the 400m metric to determine what is considered an “accessible location”. It does not require or encourage development to be in accessible locations.</p> <p>The County Durham Plan had as a key objective locating jobs and housing in the most accessible and sustainable locations (para. 2.11) but it does not stipulate in any of its policies a minimum distance to bus stops or other public transport. NPPF para. 105 looks for “a genuine choice of transport modes” for significant developments.</p> <p>Several recent major planning applications for sites allocated in the County Durham Plan (e.g. Bent House Lane, Sniperley Park) have proposed housing which lies more than 400m from a bus stop. It would appear that the draft</p>	<p>Public Transport Accessibility text in the previous Parking and Accessibility SPD referred to by the City of Durham Trust has been have been updated and reinserted into residential guidance. These paragraphs were omitted at previous consultation stages and have been reintroduced at the request of the DCC public transport team and comments received during the consultation.</p> <p>This reinserted public transport accessibility text is the same text that is in the current adopted 2019 standards but with some flexibility built into the 400m from bus stop standards. This text has also been tweaked slightly so it is specifically relevant to residential development and is therefore placed in the residential section.</p> <p>This was to reflect comments from stakeholders that it is impossible to keep achieve standards in some of the more rural areas of the County.</p>

SPD is weaker than previous standards and if adopted would make it harder to reject housing developments which are not readily accessible by public transport.

The Trust would like to see the SPD strengthened to adopt the latest guidance from CIHT, whose January 2018 publication '*Buses in Urban Developments*'<sup>3</sup> recommends maximum walking distances to bus stops which vary according to the frequency of service available. Table 4 suggests a maximum walking distance of 500m for core bus corridors with two or more high-frequency services; 400m for single high-frequency routes (every 12 minutes or better); and 300m for less frequent routes.

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

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

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

	referenced in the Trust's response to the previous consultation round.	
<b>City of Durham Parish Council</b>	<p>The draft PASPD does not appear to provide flexibility regarding the amount of car parking required in an accessible location, it proposes to apply standards equally across the county. Whilst it suggests that the council is proposing that where development is situated in an accessible location, a lower level of car parking provision 'may' be acceptable – this is not defining maximum standards, as referred to by the local plan Inspector. The Parish Council has concerns that taking a case-by-case approach could result in inconsistencies. It is also disappointing that the draft SPD makes no special provision for urban parts of the county, such as Durham City.</p>	<p>The SPD does allow parking to be reduced on a case-by-case basis in accessible locations which are defined by their proximity to public transport.</p> <p>The Local Cycling and Walking Infrastructure Plans (LCWIPs) framework is referred to in the updated SPD as a tool to reduce parking on development sites.</p> <p>DCC now have 3 LCWIPs adopted, with another 9 in the latter stages of development. This is an important reference in the SPD as it establishes the LCWIPs (in conjunction with policy 21 of the County Durham Plan) as a tool that decision makers could use to reduce parking at destination development sites</p>
<b>Michelle Robinson (Stantec) on behalf of Bellway homes</b>	<p>The Parking and Accessibility Standards SPD was previously consulted upon in 2021. Comments are being sought on the full content of the SPD, although there is a helpful summary which provides detail regarding the changes which are proposed. The SPD is to provide further guidance regarding Policy 21: Delivering Sustainable Transport.</p> <p>Reference is provided to the background of this SPD in terms of the Inspector's Report into the County Durham Plan. Paragraph 162 of the Inspector's report notes:</p> <p>"...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."</p> <p>In addition, National Planning Policy Framework (NPPF) at paragraph 107 sets out that in setting local parking standards for residential and non-residential development, policies should take into account:</p> <ol style="list-style-type: none"> <li>the accessibility of the development;</li> <li>the type, mix and use of development;</li> <li>the availability of and opportunities for public transport;</li> </ol>	<p>(Non-residential) has been added in brackets to add clarity that the definition of public transport accessibility in this section to clarify that it relates to destination (non-residential locations) only.</p> <p>The subheading now makes it clear that maximum standards only apply to destination locations (non-residential).</p> <p>Public Transport Accessibility text in the previous Parking and Accessibility SPD referred to by the City of Durham Trust has been updated and reinserted into residential guidance. These paragraphs were omitted at previous consultation stages and have been reintroduced at the request of the DCC public transport team and comments received during the consultation.</p> <p>This reinserted public transport accessibility text is the same text that is in the current adopted 2019 standards but with some flexibility built into the 400m from bus stop standards. This text has also been tweaked slightly so it is specifically relevant to residential development</p>

	<p>d) local car ownership levels; and e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.”</p> <p>Bellway Homes accept the principle for the need for clear and transparent parking standards, particularly when designing new residential developments, however they do wish to make some detailed comments.</p> <p>2.1 Accessibility The draft SPD seeks to define the meaning of an accessible destination as being: a. “within 400m of a bus stop or 800m of a train station; and b. where public transport runs at a rate of two per hour or more at peak hours (6am – 6pm.”</p> <p>Bellway would like to state that these distances should not be used to define ‘in principle’ locations for residential development. As was experienced during the Winterton Community Hospital Planning Inquiry (APP/X1355/W/16/3163598), matters of location and accessibility are often more complex matters of judgement taking into account a range of factors including the services and facilities on offer and the need to enhance rural communities.</p> <p>It is also inferred in paragraph 2.9 that this applies to non-residential developments only, but this should be made clearer for example in the heading “Definition of an Accessible Destination for Non Residential Developments.” This would prevent any misapplication between an accessible destination for non-residential developments and the sustainability of a residential development.</p> <p>If this approach is taken forward, it would also be helpful if it is made clear whether the measurement is taken as the “crow flies” or measurement by road. Clarity would ensure consistency of application and reduce any ambiguity.</p>	<p>and is therefore placed in the residential section.</p> <p>This was to reflect comments from stakeholders that it is impossible to keep achieve standards in some of the more rural areas of the County.</p>
<p><b>Lichfields- on behalf of Taylor Whimpey</b></p>	<p><b><i>Definition of an Accessible Destination</i></b> We welcome the principle of setting a definition of ‘<i>accessible destination</i>’ in relation to the setting of parking standards, recognising that it is appropriate to allow a lower level of parking provision in commercial</p>	<p>Although various policy documents have different standards on walking distances to bus stops, the CIHT document ‘Buses in Urban Developments’ quoted here is fairly up to date (2018) and it references the</p>

	<p>developments in highly accessible locations. However, a reduction should also be considered for residential developments.</p> <p>Should this definition of an ‘<i>accessible destination</i>’ be used to control the location of new housing in the County, it is important that it is sufficiently flexible so as to not restrict the growth of settlements which would not accommodate new development within 400m of a bus stop, or to require bus services to use inefficient routing to serve all new homes across the County based on this measurement.</p> <p><i>Should a strict walking distance to bus stops be applied?</i></p> <p>In respect of setting any strict requirement for walking distance to a bus stop CIHT publication ‘Guidelines for Planning for Public Transport in Developments’ (1999) emphasises that suggested walking distances are “<i>guidelines, not standards; These Guidelines attempt to set out best practice. It is recognised that it will not always be possible to meet these criteria and that compromise must sometimes be made...It is the task of the professional planner, designer and engineer to decide if a lower standard is acceptable in given circumstances or if another approach would be more beneficial.</i>”</p> <p>The guidance also sets out that “<i>it is more important to provide frequent bus services that are easy for passengers to understand than to reduce walking distances to bus stops by a few metres</i>”.</p> <p>This guidance also sets out the 400m distance as being appropriate and is considerably dated, the inappropriateness of this figure is discussed in further detail below.</p> <p><i>Providing Efficient Bus Services</i></p> <p>CIHT guidance referenced above sets out that “<i>it is more important to provide frequent bus services that are easy for passengers to understand than to reduce walking distances to bus stops by a few metres</i>”. In this respect, bus operators will generally prefer a bus service to follow an efficient route, for example following a major road or a main bus corridor through new developments. Focussed towards the layout of larger development Bus Services and New Residential Developments (Stagecoach,</p>	<p>use of 400m as a benchmark distance for walking to bus stops. This document is supported by the RTPI, the Campaign for Better Transport as well as public transport companies such as Go Ahead , Stagecoach and First group (please see case study on pg. 11. The Council agrees other factors such as walking routes, frequency and the ongoing routing of a bus service is important but the 400m walking to bus stop is a well-recognised guideline for accessibility.</p> <p>Public Transport Accessibility text in the previous Parking and Accessibility SPD referred to by the City of Durham Trust has been have been updated and reinserted into residential guidance. These paragraphs were omitted at previous consultation stages and have been reintroduced at the request of the DCC public transport team and comments received during the consultation.</p> <p>This reinserted public transport accessibility text is the same text that is in the current adopted 2019 standards but with some flexibility built into the 400m from bus stop standards. This text has also been tweaked slightly so it is specifically relevant to residential development and is therefore placed in the residential section.</p> <p>This was to reflect comments from stakeholders that it is impossible to keep achieve standards in some of the more rural areas of the County.</p>
--	--	---



2017) advises, there will be circumstances where achieving a 400-metre walking catchment '*results in an inefficient and contrived layout, greatly undermining the potential effectiveness of the proposed bus route. Stagecoach will always prefer an efficient bus routing strategy, serving the great majority of dwellings well, than one that serves all homes poorly with a low-frequency or indirect service. Thus we support policy approaches offering some degree of flexibility on walking distances to bus stops where this is appropriate*'. In this regard we agree with the principle (paragraph 2.11 of the draft SPD) that proximity to a public transport stop is not a guarantee that services will run often enough to make places accessible. However, we would suggest that efficient routing of services should be considered when determining whether places can be considered accessible. The availability of an efficient service allowing people to access major centres in a short timescale would act as a strong pull for people to walk a further distance to access the service.

#### *Ensuring Viable Bus Services*

We would suggest that the aims of planning policies that control the location of new housing should include an aim to increase the number of homes in settlements surrounding efficient bus routes with an aim to increase the patronage of services to support new and improved services. This would in turn increase the attractiveness of using the services and encourage people to walk further to access these.

Our view is that the form and location of an existing settlement and established bus routes should be taken into account in determining an appropriate walking distance to a bus-stop. CIHT Buses in Urban Developments places a great emphasis on retaining the viability of public transport corridors, recognising that new growth can be structured to reinforce existing corridors.

This is particularly important in semi-rural areas where bus services are experiencing a drop in customers and are focussed on main routes linking settlements. In these areas it may not always be possible or preferable from a wider planning perspective to locate all new dwellings within 400m of a bus stop. To restrict growth in these settlements could not only result in a failure to deliver the

housing required for the County, but would also risk the viability of bus services. New developments can also be effective in promoting bus patronage through Travel Plan measures such as welcome packs referencing local bus services and offering short-term free bus passes. This benefit should not be lost based upon a strict application of an acceptable walking distance to a bus stop.

#### *Ensuring Viable Developments*

The re-routing of bus services to ensure a 400m walking distance could have viability implications on new developments. In re-routing bus services developers could be expected to make payments to subsidise new services for a number of years following the occupation of developments. This will have implications on the viability of developments with associated knock-on effects such as the delivery of affordable housing.

This, combined with the preference expressed from bus operators for efficient routes, demonstrates that there should be some flexibility applied to the walking distance to bus stops when planning new developments.

#### *How far are people willing to walk to a bus-stop?*

There is also a concern that the 400m threshold is based on out-dated evidence and people are now willing to walk longer distances to access public transport in light of a greater appreciation for sustainable travel modes and an individual's own 'green agenda' alongside a wider acknowledgement of the health benefits of walking. It is also recognised that people are willing to walk a longer distance to a well frequented bus stop, CIHT Buses in Urban Developments (2018) states '*Consequently, people will accept longer walks to reach bus services that are fast and direct, or more frequent, and to stops serving a wider range of destinations*'.

The draft SPD references the CIHT's Planning for Walking (April 2015) as the source of the comment that '*people are generally willing to walk 400m to a bus stop or 800m to a train station*'. This document then references the source of this distance as

being '*Creating places: Achieving quality in residential developments, incorporating guidance on layout and access*' Department of the Environment Northern Ireland (2000). CIHT Buses in Urban Environments dates this even further stating that '*Custom and practice for many years suggests a maximum walking distance of 400 metres from a bus stop (DOE, 1973)*'.

More recent publications from CIHT acknowledge that the research is out-dated, and more work is required to reassess the requirements. More up-to-date research including data from the National Travel Survey demonstrates that, outside London, the average distance people walk to a bus stop is around 600m, and the 85th percentile walking distance is over 800m.

A large proportion of County Durham is semi-rural where, walking distances are significantly greater than in urban areas. This supports the principle that flexibility should be applied in determining whether dwellings are within an appropriate distance of a bus-stop.

#### *What Other Factors Should be Taken into Account?*

The availability of services within each settlement should also be taken into account in ascertaining whether the walking distance to a bus-stop should be a determining factor in planning applications for new housing in the County. This is particularly relevant in a post-covid environment with continuing increased levels of working from home resulting in a greater proportion of journeys being made solely to access facilities such as local shops, doctors and schools as opposed to being for commuting purposes.

The route to bus services should also be considered in determining whether the distance is appropriate. It is widely accepted that people will walk further to a bus-stop with a high-quality environment. Buses -in Urban Development states that '*the quality of the walking route itself may affect people's judgement of an acceptable walking distance. Safe routes, well overlooked and with visual interest along the way will be perceived as less onerous than isolated, poorly lit and uninteresting routes.*'

	<p><i>Conclusion and Recommendations</i></p> <p>The above demonstrates that it is necessary to provide flexibility in determining whether a site is in an '<i>accessible location</i>' when assessing whether dwellings are within an appropriate distance of a bus stop, both to ensure the growth and development of the County and its settlements and to secure efficient bus services.</p> <p>Taylor Wimpey recommend that the SPD is amended to confirm that a range of factors will be taken into account when determining whether new developments are accessible. With regard to an appropriate distance to a bus- stop this should include:</p> <ul style="list-style-type: none"> <li>• Up-to-date evidence of how far people are willing to walk to a bus-stop;</li> <li>• The delivery of efficient bus services (including through consultation with the relevant bus operator);</li> <li>• The form of the settlement and the ability to deliver the necessary number of new homes within 400m of an efficient bus service;</li> <li>• The viability implications of re-routing of bus services on developments;</li> <li>• The ability of Travel Plan measures secured through new developments to provide financial support to existing and the provision of new bus services;</li> <li>• The availability of other services within a settlement; and</li> <li>• The quality of the walking route.</li> </ul>	
<p><b>Lichfields on behalf of Theakstons Ltd</b></p>	<p>Accessibility</p> <ul style="list-style-type: none"> <li>• We welcome the principle of setting a definition of '<i>accessible destination</i>' in relation to the setting of parking standards, recognising that it is appropriate to allow a lower level of parking provision in commercial developments in highly accessible locations.</li> <li>• However, should this definition of an '<i>accessible destination</i>' be used to control the location of new housing in the County, it is important that it is sufficiently flexible so as to not restrict</li> </ul>	<p>Although various policy documents have different standards on walking distances to bus stops, the CIHT document 'Buses in Urban Developments' quoted here is up to date (2018) and it references the use of 400m as a benchmark distance for walking to bus stops.</p> <p>This document is supported by the RTPI, the Campaign for Better Transport as well as public transport companies such as Go Ahead , Stagecoach and First group (please see case study on pg. 11. The Council</p>

	<p>the growth of settlements which would not accommodate new development within 400m of a bus stop, or to require bus services to use inefficient routing to serve all new homes across the County based on this measurement.</p> <p><b>Ensuring Viable Bus Service</b></p> <ul style="list-style-type: none"> <li>• In respect of setting any strict requirement for walking distance to a bus stop CIHT publication 'Guidelines for Planning for Public Transport in Developments' (1999) emphasises that suggested walking distances are "<i>guidelines, not standards; These Guidelines attempt to set out best practice. It is recognised that it will not always be possible to meet these criteria and that compromise must sometimes be made...It is the task of the professional planner, designer and engineer to decide if a lower standard is acceptable in given circumstances or if another approach would be more beneficial.</i>"</li> <li>• The guidance also sets out that "<i>it is more important to provide frequent bus services that are easy for passengers to understand than to reduce walking distances to bus stops by a few metres</i>".</li> <li>• This guidance also sets out the 400m distance as being appropriate and is considerably dated, this is discussed in further detail below.</li> <li>• <b><i>Should a strict walking distance to bus stops be applied?</i></b></li> <li>• <b><i>Providing Efficient Bus Services</i></b></li> </ul> <p>CIHT guidance referenced above sets out that "<i>it is more important to provide frequent bus services that are easy for passengers to understand than to reduce walking distances to bus stops by a few metres</i>". In this respect, bus operators will generally prefer a bus service to follow an efficient route, for example following a major road or a main bus corridor through new developments.</p>	<p>agrees other factors such as walking routes , frequency and the ongoing routing of a bus service is important but the 400m walking to bus stop is a well-recognised guideline for accessibility.</p> <p>Public Transport Accessibility text in the previous Parking and Accessibility SPD referred to by the City of Durham Trust has been have been updated and reinserted into residential guidance. These paragraphs were omitted at previous consultation stages and have been reintroduced at the request of the DCC public transport team and comments received during the consultation.</p> <p>This reinserted public transport accessibility text is the same text that is in the current adopted 2019 standards but with some flexibility built into the 400m from bus stop standards. This text has also been tweaked slightly so it is specifically relevant to residential development and is therefore placed in the residential section.</p> <p>This was to reflect comments from stakeholders that it is impossible to keep achieve standards in some of the more rural areas of the County.</p>
--	---	--

Focussed towards the layout of larger development Bus Services and New Residential Developments (Stagecoach, 2017) advises, there will be circumstances where achieving a 400-metre walking catchment '*results in an inefficient and contrived layout, greatly undermining the potential effectiveness of the proposed bus route.*

*Stagecoach will always prefer an efficient bus routing strategy, serving the great majority of dwellings well, than one that serves all homes poorly with a low-frequency or indirect service. Thus we support policy approaches offering some degree of flexibility on walking distances to bus stops where this is appropriate'.*

In this regard we agree with the principle (paragraph 2.11 of the draft SPD) that proximity to a public transport stop is not a guarantee that services will run often enough to make places accessible. However, we would suggest that efficient routing of services should be considered when determining whether places can be considered accessible. The availability of an efficient service allowing people to access major centres in a short timescale would act as a strong pull for people to walk a further distance to access the service.

We would suggest that the aims of planning policies that control the location of new housing should include an aim to increase the number of homes in settlements surrounding efficient bus routes with an aim to increase the patronage of services to support new and improved services. This would in turn increase the attractiveness of using the services and encourage people to walk further to access these.

Our view is that the form and location of an existing settlement and established bus routes should be taken into account in determining an appropriate walking distance to a bus-stop. CIHT Buses in Urban Developments places a great emphasis on retaining the viability of public transport corridors, recognising that new growth can be structured to reinforce existing corridors.

This is particularly important in semi-rural areas where bus services are experiencing a drop in customers and are focussed on main routes linking settlements. In these areas it may not always be possible or preferable from a wider planning perspective to locate all new dwellings within 400m of a bus stop. To restrict growth in these settlements could not only result in a failure to deliver the housing required for the County, but would also risk the viability of bus services.

New developments can also be effective in promoting bus patronage through Travel Plan measures such as welcome packs referencing local bus services and offering short-term free bus passes. This benefit should not be lost based upon a strict application of an acceptable walking distance to a bus stop.

The re-routing of bus services to ensure a 400m walking distance could have viability implications on new developments.

In re-routing bus services developers could be expected to make payments to subsidise new services for a number of years following the occupation of developments. This will have implications on the viability of developments with associated knock-on effects such as the delivery of affordable housing.

This, combined with the preference expressed from bus operators for efficient routes, demonstrates that there should be some flexibility applied to the walking distance to bus stops when planning new developments.

There is also a concern that the 400m threshold is based on out-dated evidence and people are now willing to walk longer distances to access public transport in light of a greater appreciation for sustainable travel modes and an individual's own 'green agenda' alongside a wider acknowledgement of the health benefits of walking. It is also recognised that people are willing to walk a longer distance to a well frequented bus stop which aligns with the logic that people are prepared to walk further to a train station. Indeed, CIHT Buses in Urban Developments (2018) states '*Consequently, people will*

*accept longer walks to reach bus services that are fast and direct, or more frequent, and to stops serving a wider range of destinations'.*

The draft SPD references the CIHT's Planning for Walking (April 2015) as the source of the comment that *'people are generally willing to walk 400m to a bus stop or 800m to a train station'*. This document then references the source of this distance as being *'Creating places: Achieving quality in residential developments, incorporating guidance on layout and access'* Department of the Environment Northern Ireland (2000). CIHT Buses in Urban Environments dates this even further stating that *'Custom and practice for many years suggests a maximum walking distance of 400 metres from a bus stop (DOE, 1973)'*.

More recent publications from CIHT acknowledge that the research is out-dated, and more work is required to reassess the requirements. More up to date evidence was published by WYG in 2015. WYG undertook an extensive analysis of the actual distances people across the country walked to access public transport. In light of this, the WYG analysis, as well as data from the National Travel Survey demonstrates that, outside London, the average distance people walk to a bus stop is around 600m, and the 85th percentile walking distance is over 800m (as set out in the table below – data from 2010-2012).

A large proportion of County Durham is semi-rural where, as recognised in the WYG research, walking distances are significantly greater than in urban areas. This supports the principle that flexibility should be applied in determining whether dwellings are within an appropriate distance of a bus-stop.

The availability of services within each settlement should also be taken into account in ascertaining whether the walking distance to a bus-stop should be a determining factor in planning applications for new housing in the County. This is particularly relevant in a post-covid environment with continuing increased levels of working from home resulting in a greater proportion of journeys being made solely to access facilities such as local shops, doctors and schools as opposed to being for commuting purposes.



The route to bus services should also be considered in determining whether the distance is appropriate. It is widely accepted that people will walk further to a bus-stop with a high-quality environment. Buses -in Urban Development states that *'the quality of the walking route itself may affect people's judgement of an acceptable walking distance. Safe routes, well overlooked and with visual interest along the way will be perceived as less onerous than isolated, poorly lit and uninteresting routes.'*

The above demonstrates that it is necessary to provide flexibility in determining whether a site is in an *'accessible location'* when assessing whether dwellings are within an appropriate distance of a bus stop, both to ensure the growth and development of the County and its settlements and to secure efficient bus services.

Our client recommends that the SPD is amended to confirm that a range of factors will be taken into account when determining whether new developments are accessible. With regard to an appropriate distance to a bus- stop this should include:

Figure 1 Average walking distance to bus stops

Source: WYG Environment Planning Transport Limited (2015) 'How Far do People Walk?' Presented at the PTRC Transport Practitioners' Meeting London, July 2015

- Up-to-date evidence of how far people are willing to walk to a bus-stop;
- The delivery of efficient bus services;
- The form of the settlement and the ability to deliver the necessary number of new homes within 400m of an efficient bus service;
- The viability implications of re-routing of bus services on developments;
- The ability of Travel Plan measures secured through new developments to provide financial support to existing and the provision of new bus services;
- The availability of other services within a settlement; and
- The quality of the walking route.

<p><b>Sunny Ali, Highways Agency</b></p>	<p>We were consulted on a previous draft version of this document in February 2021, and we issued a response in the same month. We acknowledge that during the Examination in Public hearings for the County Durham Plan, the planning inspector recommended that this guidance be reviewed and set out more formally as an SPD to support Policy 21 (Delivering Sustainable Transport) of the Plan. This SPD now acts as the second draft.</p> <p>We have reviewed this updated document to ensure our previous comments have been taken into account. We previously noted that it may be beneficial to have an explanation of accessible destinations from the outset and that factors such as the ability for users of new developments to access desirable locations should be considered through the planning application process when determining the sustainable credentials of a site. We cannot see any evidence in the document to suggest these comments have been considered and would therefore reiterate the above.</p> <p>We would note that, since issuing our response to this document in February 2021, we have published our 'Net zero highways: our 2030 / 2040 / 2050 plan.' The document covers National Highways' commitment to developing and implementing a programme to improve public transport operations on the SRN, promotion of walking and cycling and measures to reduce the need to travel. The publishing of this document, our ongoing commitment to cut emissions from the SRN, along with the publishing of the Department for Transport's document 'Decarbonising Transport: A Better, Greener Britain' (July 2021) and the climate emergency has prompted us to make further comments on this document which we hope will be considered at this later stage.</p> <p>We acknowledge that Durham County Council does not wish to set maximum parking standards. The SPD notes that while maximum parking standards are traditionally thought to discourage excessive car ownership and encourage sustainable travel, it can have little to no impact on car</p>	<p>The definition of accessibility at destinations is applied to public transport only in the SPD and this clarified in the latest draft of the SPD. In an ideal world, the council would insist that accessible destinations are served by four buses an hour, but post Covid, the challenge for the Council and bus operators is to maintain existing levels of service.</p> <p>The Council notes the comments of the Highways Agency and agrees that officers when determining planning applications should consider walking and cycling links in the proximity to the development sites in accordance with Policy 21 of the County Durham Plan. A full consideration of walking and cycling links provides an opportunity for decision makers to reduce parking at destinations.</p> <p>Although it is impossible for a countywide definition of adequate accessibility for walking and cycling, it is now important to cross reference the LCWIP framework in the SPD. The LCWIP framework is referred to in the updated SPD as a tool to reduce parking on development sites.</p> <p>The need to reference walking and cycling to make developments more sustainable was referenced by the Inspector in his final report on the County Durham Plan. It is also part of CDP Policy 21 and has been raised in representations from National Highways and the City of Durham Trust.</p> <p>DCC now have 3 LCWIPs adopted, with another 9 in the latter stages of development. This is an important reference in the SPD as it establishes the LCWIPs (in conjunction with policy 21 of the County Durham Plan) as a tool that decision makers could use to reduce parking at destination development sites.</p>

ownership provision and can lead to other problems such as vehicles parking on adjacent streets, pavements and verges. The SPD also quotes NPPF 108 which states how maximum parking standards should only be set where there is a clear and compelling justification for managing the local road network, or for optimising the density in city, town centres, and other locations that are well served by public transport.

However, maximum parking standards were raised as an issue at the examination in public of the now adopted County Durham Plan, where the Inspector queried why maximum standards had not been proposed in the Council's current parking standards. The Inspector's view was that maximum standards at destinations should be implemented in accessible locations to encourage people to use more sustainable transport – to walk, cycle, or take public transport instead of driving.

We note that for retail, employment, leisure and other destination parking standards, it is stated that parking standards are not minimum or maximum but are intended to be applied equally across the County and where a development is situated in an accessible location, a lower parking requirement may be negotiated with Highways officers (as above). In comparison, residential parking standards are set as 'minimum' (with no mention of accessible locations).

We are concerned that setting minimum parking standards for residential parking, and being non-descript for other types of development, may result in excessive car parking, in turn encouraging more car trips to the development and journeys on our network. Minimum standards generally do not encourage sustainable travel. It is also unclear in the SPD exactly how flexible highway officers would be when considering allowing a lower parking requirement in 'accessible locations.' We are also concerned that setting minimum parking standards may lead to developers not funding public transport improvements due to excessive parking provision resulting in development with less demand for public transport facilities. We would suggest that this policy position would appear to build in car

dependency at developments over the Plan period which conflicts with our net zero highways plan.

We would also suggest that that the current policy position also conflicts with the County Durham's Local Plan which states "*the design of new development should proactively seek to provide opportunities for the integration of walking, cycling and public transport as well as encouraging car sharing and electric vehicles. It should also encourage efficient and sustainable growth of freight and minimise the number of road journeys created by business and industry.*" It also conflicts with Policy 21 of the County Durham Local Plan which states "*car parking at destinations should be limited to encourage the use of sustainable modes of transport, having regard to the accessibility of the development **by walking, cycling, and public transport.***"

We would encourage the Parking and Accessibility SPD to ensure that 'public transport and active travel are the natural first choice for daily activities' in support of the Department for Transport's document 'Decarbonising Transport: A Better, Greener Britain' (July 2021) and the climate emergency. We are therefore supportive of the Inspector's view where it was suggested that maximum standards should be set to encourage sustainable travel and we would encourage Durham County Council to consider outlining maximum parking standards.

This would be the case whether the development is in an accessible location or not; if the development is accessible, then sustainable travel should be encouraged.

If the development is not in an accessible location, then residents / users of the site are more likely to drive, and this should not simply be accepted. We would suggest that a maximum parking standard should still be applied, and developers should fund public transport improvements or provision to be introduced alongside the development to account for limitations on car use. Availability of parking in the vicinity of the site (on-street / public car parks) may need to be restricted through a traffic regulation order.

	<p>Definition of an Accessible Destination As noted above, we acknowledge the SPD states that where a development is in an accessible location, a lower level of car parking may be requested by development management and highway officers. The criteria for an accessible destination set out in the SPD is included below for reference:</p> <ul style="list-style-type: none"> <li>• Within 400m of a bus stop or 800m of a train station (in line with CIHT's Planning for Walking)</li> <li>• Where public transport runs at a rate of two per hour or more at peak hours (6am – 6pm)</li> </ul> <p>We would suggest that two public transport services per hour does not represent an accessible location. We would expect there to be at least four services per hour for a location to be considered accessible by public transport.</p> <p>Reducing parking standards in these locations would not necessarily encourage people to use public transport and may instead result in obstructive parking and other safety issues. Additionally, and as we previously noted, 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. We note there appears to be no mention of what would be considered an accessible destination in cycling terms.</p> <p>We would therefore encourage Durham County Council to reconsider what is considered an accessible destination in terms of public transport frequency and to include cycling when defining what is an accessible destination.</p>	
<p><b>Richard Newsome- on behalf of Avant</b></p>	<p>Accessibility – Definition of an Accessible Destination The SPD makes provision at paragraph 2.9 that where a development is in an accessible location that a lower level of car parking may be requested by Development Management and highways officers on a case-by-case basis. AHNE would generally welcome the move to give officers flexibility to make the best decision for individual, accessible sites based on the site-specific circumstances of each case.</p>	<p>This reinserted public transport accessibility text is the same text that is in the current adopted 2019 standards but with some flexibility built into the 400m from bus stop standards. This text has also been tweaked slightly so it is specifically relevant to residential development and is therefore placed in the residential section.</p> <p>This was to reflect comments from stakeholders that it is impossible to</p>

	<p>We note the criteria for being an accessible location set out at paragraph 2.13 are being within 400m walking distance to a bus stop or 800m to a train station and the public transport running twice or more per hour at peak times (6am-6pm). However, flexibility is needed when considering and applying these criteria to a site. It may be that there are sites which either fall marginally outside the above walking distances or have a slightly reduced frequency of service through some of the peak hours but could legitimately be seen to offer viable and attractive alternatives to the use of the public car. Such sites should not be discounted as being accessible for consideration of car parking provision solely for a failure to comply stringently with the proposed definition in paragraph 2.13 of the SPD.</p> <p>With regards to paragraph 2.14 it is considered that the operation of a school bus should be taken into account in considering the accessibility of a site as if children are able to utilise a bus service rather than rely on parents driving them to school this would have a marked benefit on vehicle movements during the defined peak hours.</p>	<p>keep achieve standards in some of the more rural areas of the County.</p> <p>The council don't agree that school buses should count towards the accessibility of non-residential destinations. This is clarified in the latest version of the SPD.</p>
--	--	---

No. of Comments: 10

## Question 2

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

<b>Respondent</b>	<b>Comment</b>	<b>DCC Response</b>
<p><b>Heather Evans- Cycling UK Local Rep.</b></p>	<p>With regard to the current Parking &amp; Accessibility Supplementary Planning document consultation, I sent the comments below on the initial consultation on 10 February. However, my comments don't appear to have been taken on board in the revised document now being consulted on.</p> <p>My main concerns are still:</p> <p>1) just long stay and no short stay cycle parking at many places visited by cyclists such as garden centres (see comments on Destination Parking Standards below).</p>	<p>Noted about short stay parking at destinations such as garden centres. Residential Care Homes, Cinemas and theatres have been amended to align with LTN/1/20 so that we are now requiring short stay parking on many of the development sites mentioned in your representation. All our cycling parking standards should now align with LTN 1/20.</p> <p>FE Colleges and Primary School should be covered by a Travel Plan on a site-specific basis so cycling parking should be based on Travel Plan.</p>

	<p>2) the 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 (see 3.1 below). Attached is a copy of page 26 from a document, <i>Standards for Public Cycle Parking</i>, published in June 2021 which refers to the problem caused by this type of stand.</p> <p>Please can you consider the comments above (and below) and let me have your thoughts.</p>	<p>Note you comment on the Sheffield stands with the base plate which is part of Figure 2. This has now been removed and replaced with a photo of Sheffield stand without a base plate.</p> <p>Thank you for your comments.</p>
<p><b>Belmont Parish Council</b></p>	<p>Probably, though it is rather hopeful that shoppers will use cycles for trips to supermarkets</p>	<p>Comment Noted</p>
<p><b>Matthew Phillips- on behalf of John Lowe, City of Durham Trust</b></p>	<p>The revised SPD departs from previous standards by using floor area, instead of numbers of staff or users, for some of the cycle parking requirement rates.</p> <p>These have been taken from the tables in LTN 1/20 section 11.3 which are intended “in the absence of any local guidance or standards”. LTN 1/20 paragraph 11.3.3 advises that data gathered for Local Cycling and Walking Infrastructure Plans may help in predicting potential growth in cycling and enable a more considered approach. The Trust notes that the County Council has adopted three LCWIPs and is drawing up nine more. While the Trust is not unhappy for floor area to be used to indicate rates, it suggests that these should always be cross-checked against trip generation evidence, any Travel Plan targets, and any evidence of unsatisfied need in the vicinity of a proposed development.</p> <p>*taken from q6 response  <b>Residential cycle parking for apartments, etc.</b></p> <p>The SPD does not stipulate how much cycle parking should be provided for apartment blocks and other forms of collective housing. There is no requirement given for cycle parking at Purpose Built Student Accommodation</p>	<p>All the cycling parking standards in the updated SPD have been amended to align with LTN/1/20 so that we are now requiring short stay parking on many of the development sites mentioned in your representation.</p> <p>For residential flats, it will be expected that every dwelling should have secure parking for a cycle, mobility scooter or motorbike but there is room for flexibility and bespoke design solutions in how this is provided within shared accommodation. It would be recommended that this provision is at ground floor level.</p> <p>FE Colleges and Primary School should be covered by a Travel Plan on a site-specific basis so cycling parking should be based on Travel Plan.</p> <p>The Council notes the comments of the City of Durham Trust and agrees that officers when determining planning applications should consider walking and cycling links in the proximity to the development sites in accordance with Policy 21 of the County Durham Plan. A full consideration of walking and cycling links provides an opportunity for decision makers to reduce parking at destinations.</p>

	<p>either. This must surely be an oversight.</p> <p>The 2019 Parking and Accessibility Standards had the following requirement for residential properties without garages:</p> <ul style="list-style-type: none"> <li>• where no garage is provided which meets the minimum garage size standard, 2 long stay cycle spaces per 5 bedrooms (40%) should be provided</li> <li>• where residential units form a block (such as flats or purpose built student accommodation), a minimum of 2 long stay cycle space per 5 bedrooms (40%) should be provided as well as 1 visitor space per 10 bedrooms (10%)</li> <li>• where a house, which does not have the minimum requirement for garage storage, has been converted to a HMO then 2 long stay cycle spaces per 5 bedrooms (40%) should be provided, where practical</li> </ul> <p>The Trust is of the view that these requirements should be retained in the SPD. They are justified by the current national rates of cycle ownership in the National Travel Survey.</p> <p>Table 11-1 of LTN 1/20 suggests a rather higher rate of one long-stay cycle parking space per bedroom for all types of residential development (except sheltered housing and nursing homes), so the council should give consideration as to whether the 40% rate is sufficient.</p> <p><b>Cycle parking at destinations</b>  The Trust's submission to the <i>Issues and Options</i> consultation noted that no visitor cycle parking was required for various types of retail (bulky goods, DIY, builders merchants and garden centres). The Council's comment on this in the Statement of Consultation mentions the change to basing cycle parking provision on floor area, but fails to justify why these types of</p>	<p>Although it is impossible for a countywide definition of adequate accessibility for walking and cycling, it is now important to cross reference the LCWIP framework in the SPD. The LCWIP framework is referred to in the updated SPD as a tool to reduce parking on development sites.</p> <p>The need to reference walking and cycling to make developments more sustainable was referenced by the Inspector in his final report on the County Durham Plan. It is also part of CDP Policy 21 and has been raised in representations from National Highways and the City of Durham Trust.</p> <p>DCC now have 3 LCWIPs adopted, with another 9 in the latter stages of development. This is an important reference in the SPD as it establishes the LCWIPs (in conjunction with policy 21 of the County Durham Plan) as a tool that decision makers could use to reduce parking at destination development sites.</p> <p>As part of the residential parking standards, we do require secure suitable storages for cycling where garages are not provided. This suitable parking comes in form of a 2x2m storage space (shed) so that homeowners are not dissuaded owning a bike or other form of mobility aid.</p>
--	---	--



	<p>retail are excluded, and no change was made to the requirement. This was presumably on the assumption that a cyclist would not be able to carry away purchases from these types of retail unit.</p> <p>The Trust suggests that a minimum of four short-stay spaces for visitors should be provided.</p> <p>People may wish to visit such retail outlets by bicycle to browse, or to have goods delivered by van. Most retail outlets in these categories also sell smaller items that can be carried home by bicycle, and with a trailer and an e-bike, bulkier items can also be transported.</p> <p>More than one respondent objected to the fact that hot food takeaways were not required to provide cycle parking. The Council's comment in the Statement of Consultation stated "no cycle parking requirement has been made for hot food takeaways and cinemas, as provision of individual stands for every business would lead to street clutter when assessed cumulatively".</p> <p>This is illogical. If there would be a problem of street clutter, why are other businesses, such as small general retail units, required to provide cycle parking when hot food takeaways are not?</p> <p>The problem of street clutter should not arise as paragraph 3.10 of the revised SPD promotes clustering of cycle parking in town centres. As it stands the SPD requires car parking for hot food takeaways, but not cycle parking. There seems to be no justification for this. Aside from customers, home delivery operators such as Deliveroo would benefit from having cycle parking available nearby.</p> <p><b>Omissions</b> <b>Cycle parking at public transport interchanges</b></p>	
--	--	--

	<p>The SPD does not cover car or cycle parking at interchanges such as bus or railway stations.</p> <p>LTN 1/20 Table 11-1 suggests a rate of provision of 1 cycle parking space per 200 daily users at major interchanges, with provision at standard stops being on merit. Cycle parking at transport interchanges is mentioned in paragraph 3.10, but no rates have been set in the SPD.</p>	
	<p><b>Motorcycle parking</b></p> <p>Paragraph 162 of the Inspector's final report on the County Plan stipulated that the SPD should provide for "powered two-wheelers". The SPD has been revised to add paragraphs 3.19 to 3.21, covering this topic in a minimal manner. Paragraph 3.19 says that no specific separate standard for motorcycle parking has been set because it is assumed motorcyclists will use car parking bays. The next paragraph encourages provision of anchor points for chaining motorcycles.</p> <p>It is not uncommon, in the absence of specific provision, to see motorcyclists using ordinary cycle parking: it is clearly attractive to some users because they can chain the motorbike to the cycle stand. As the machines are larger, they tend to block the use of two cycle stands, and because the wheel, rather than the frame, is being locked to the stand, the motorbike will generally protrude from the cycle rack and can obstruct the footway or surrounding space.</p> <p>The Trust suggests that the SPD should be strengthened so that motorcycle parking with anchor points should be required in certain circumstances. Perhaps a suitable threshold would be where there are ten or more cycle parking spaces, or if cycle parking is accessible to motorbikes but is more convenient than the car parking.</p>	<p>The line was removed which stated that no specific standards for motorcycle parking has been set out. We have retained the words that support the specific provision of parking bays.</p>

	As for cycle parking, the motorbike parking should be located and designed to avoid the obstruction of footways when in use.	
<b>Michelle Robinson (Stantec) on Behalf of Bellway homes</b>	<p>Bellway Homes agree with the principle of providing cycle parking as part of new development. Table 1: Retail Parking Standards; Table 2: Employment Parking Standards; Table 3: Leisure Parking Standards; and Table 4: Other Destination Parking Standards all include the provision for cycling standards.</p> <p>However, table 5: Residential Parking Standards does not include any standards for cycle parking.</p> <p>Policy 21 requires at the first bullet point that “cycle parking or secure cycle storage should be provided to facilitate increased cycle ownership and use.” In practice, as part of negotiations on planning applications, officers are requiring secure cycle storage in the curtilage of each plot. Table 5 must be made clearer in terms of the requirement for secure cycle storage and this should be taken into account when setting car parking standards.</p> <p>It would also be helpful if there was a definition for ‘secure storage’ as this can often be applied differently by different officers when determining planning applications.</p>	<p>The Council agree cycling parking standards should be added as an additional column to table 5. Agree, that cycling/mobility scooter and motorbike storage should be provided within curtilage.</p> <p>Secure storage should be of covered robust nature where the homeowner can easily padlock a storage door.</p>
<b>City of Durham Parish Council</b>	<p>The Parish Council strongly supports the need to encourage increased cycling through the planning process. If the PASPD is to require cycle parking to be based on floor area of the development, it is considered that the resulting requirement should be considered in the light of trip generation and other information such as travel plans and need for cycle parking in the local area.</p>	<p>The LCWIP framework is referred to in the updated SPD as a tool to reduce parking on development sites.</p>
<b>Persimmon</b>	<p>Cycle, Mobility Scooter and Motorbike Storage</p> <p>In regards to the proposed Cycle, Mobility Scooter and Motorbike Storage area Persimmon Homes acknowledge the need for such provision to be made</p>	<p>Thank you for your comments. The storage facility could also be used to store mobility scooter and/or motorbike storage.</p>

	<p>in instances where no garage is provided.</p> <p>We do however consider proposed standard is excessive given the housetypes likely to not benefit from a garage are 1, 2 and small 3 bed dwellings where generally occupancy rates are likely to be 3 persons, or less. It is therefore excessive to require all of these housetypes to provide cycle parking for four cycles.</p>	
<p><b>Richard Newsome, on behalf of Avant</b></p>	<p>Cycle, Mobility Scooter, and Motorbike Storage</p> <p>At paragraph 4.15 the Council states that where there is not a garage that separate storage space for a cycle, mobility scooter or motorbike should be provided at a dimension of 2m x 2m.</p> <p>However, this is a non-standard dimension for many storage solutions such as garden sheds. Therefore, we would request that the Council introduces reference in paragraph 4.15 to being flexible with regards to the dimensions of storage space so that appropriate products which are widely available on the market can be used.</p> <p>Having flexibility on dimensions of storage will also assist with suitably accommodating storage within private gardens on residential developments layouts to avoid detrimentally affecting the amenity value of the spaces.</p>	<p>We have added the word 'around' before 2x2m to suggest flexibility around dimensions of the storage.</p>

No. of Comments - 8

### Question 3

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

Respondent	Comment	DCC Response
<p><b>Belmont Parish Council</b></p>	<p>Yes. This question does not address the propose percentage for EV charging points. Given that 2030 will be barely five years away from the expected adoption of this SPD, 5% active and 20% passive spaces are far too low. They should be increased to at least 20% and 50%</p>	<p>The targets in the SPD are in line with national regulations and take into account that the vast majority of people own non-electric cars currently and only a low percentage of UKs fleet is fully electric.</p>

		<p>However, the council recognise that EVs are getting a higher % of new car registrations (as much as 20% in some months of 2022) and will phase in the requirement for more and more EV charging in car parks over time.</p> <p>As such, whilst demand over the next few years would not justify the provision of charging points for every parking space in car parks at present (unless there was a particular requirement, such as the requirements of an occupier or a travel plan initiative), an adequate number of charging points must be provided to cater for both the current demand, as well as predicted demand for the first few years of the development.</p> <p>The standard's can be updated as and when the uptake of EV occurs with standards being increased at the appropriate time. This is something the Council will monitor closely.</p>
<b>Matthew Phillips- on behalf of John Lowe</b>	The Trust made this suggestion in response to the <i>Issues and Options</i> consultation and welcomes the adoption of this idea in the revised SPD.	Comment noted.
<b>City of Durham Parish Council</b>	The Parish Council supports this proposal, although it is noted that this would be encouraged, rather than required.	This is a requirement in in para 3.17 and it is being mandated at the national level.

No. of Comments - 3

#### Question 4

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

Respondent	Comment	DCC Response
<b>Belmont Parish Council</b>	No, the figure should be at least 30% EVs are more popular already with disabled drivers	To support people with disabilities and mobility impairments to drive an electric vehicle, every new destination car park should have at least one accessible charging point and bay . There may be exceptional circumstances on smaller sites where EV provision may be unviable because of connection costs but the onus will be on the developer to demonstrate unviable circumstances based on individual site characteristics.

<p><b>Matthew Phillips- on behalf od John Lowe- City of Durham Trust</b></p>	<p>The SPD requires 5% of parking spaces to be provided with active EV chargepoints. A further 20% of spaces are to have passive provision (cabling) for future upgrading. The proportion of disabled spaces is also to be 5%.</p> <p>The proportions given in the policy would thus result in one disabled bay with EV chargepoint per 200 car parking spaces.</p> <p>However the note in paragraph 3.18 that the requirement would only apply where 10 or more EV chargepoints are installed effectively means there will be no disabled EV charging bays in car parks with fewer than 200 spaces. It is hard to see how this has not been recognised as an issue in the Equalities Impact Assessment.</p> <p>The low proportions could make it very difficult for disabled users who switch to an electric vehicle to find a suitable chargepoint. Perhaps it would be appropriate to require 25% of disabled parking bays to be provided with chargepoints, rounded up to an absolute minimum of one.</p> <p>This proportion would be in line with the passive provision requirements, but making the disabled parking bays active from the outset. This should be applied also to car parks with fewer than 200 bays.</p>	<p>The guidance has been changed so that every destination car park should have an accessible charging point and bay.</p> <p>The text relating to providing 10% accessible EV parking bays on sites with over 10 disability bays has been removed.</p> <p>Also removed reference to British Standards 8300 and added reference/link to Inclusive Design best practise guide.</p> <p>In Para 2.9 we have also stipulated that accessible bays will not be limited to blue badge holders but this will be monitored to ensure that when demand goes up, blud badgers will be given priority on accessible charging spaces.</p>
<p><b>City of Durham Parish Council</b></p>	<p>The Parish Council would welcome an increase of EV charging within disabled bays. However, there is concern that because of the requirement only applying to car parks were 10 or more EV sockets are to be provided, in practice the delivery of EV charging within disabled bays would be minimal.</p>	<p>To support people with disabilities and mobility impairments to drive an electric vehicle, every new destination car park should have at least one accessible charging point and bay . There may be exceptional circumstances on smaller sites where EV provision may be unviable because of connection costs but the onus will be on the developer to demonstrate unviable circumstances based on individual site characteristics.</p>

<p><b>Persimmon</b></p>	<p>Electric Vehicle Charging The proposed EV Charging guidance should make reference to and reflect the Building Regulation exception for new dwellings to be provided with one electric vehicle charge point per dwelling “unless the installation of a charge point would increase grid connection costs by more than £3,600, in which case not all requirements will apply”.</p>	<p>The SPD has been amended to reflect the adoption of Part S of the Building Regulations. This will include reference to the exemptions including cost.</p>
<p><b>Richard Newsome on behalf of Avant</b></p>	<p>Electric Vehicle Charging</p> <p>We appreciate the Council’s support for the government’s commitment to securing electric vehicle charging on residential developments. However, as the Council notes the requirement for the delivery of electric vehicle charging is provided for through Part S of the Building Regulations which came into force in June 2022.</p> <p>Therefore, it is recommended that the SPD refers to the need to comply with the latest Building Regulations requirements this will avoid the need to update the SPD should the Building Regulations be updated in future.</p> <p>In addition, we note that the Council considers that developers will be able to benefit from economies of scale and provide charge points at a cost saving compared to individual consumers.</p> <p>However, this does not take into account that consumers can currently get government grants towards the cost of installing charging points which developers cannot. Also, the magnitude of any cost savings from economies of scale by developers often is dependent on the size of the developer and the type of charging point being required.</p>	<p>The text has been amended to reflect the adoption of Part S of the Building Regulations. This will include reference to the exemptions including cost.</p>
<p><b>Michelle Robinson (Stantec) on</b></p>	<p>From June, all new residential properties have to be fitted with an EV chargepoint as a requirement of Building Regulations. The SPD</p>	<p>The text has been amended to reflect the adoption of Part S of the Building Regulations. This will include reference to exemptions including cost And regards</p>

<b>behalf of Bellway Homes</b>	should either avoid the repetition of the Building Regulations or reflect them in full.	<p>cable routes, the standard will allow all necessary electrical cabling and/or busbar systems to be installed in future without the need for builders' work in accordance with para 6.9 of part S.</p> <p>The Council is not convinced about the merit of repeating the entirety of Part S. A summary and a link to Part S will be provided in the revised version.</p>
------------------------------------	---	---

No. of Comments - 6

**\*Question 5**

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

\*This section of the Statement of Consultation also includes comments on allocated parking spaces on residential.

<b>Respondent</b>	<b>Comment</b>	<b>DCC Response</b>
<b>Belmont Parish Council</b>	<p>*This includes allocated/in curtilage provision</p> <p>No. Dealing specifically with non allocated spaces there needs to be allocations for visitors to PBSAs Students are more likely to be visited by family and friends, given the low levels of students living at home. There should be unallocated spaces at all PBSAs in the CPZ, the proposed buffer zone and beyond, of at least 10% of the PBSA capacity</p> <p>As regards minimum allocated spaces in PBSAs data has shown students are now more likely to have their own car and this has resulted in displacement to streets well away from PBSAs and also HMOs. Therefore, there should be a minimum requirement for all PBSAs to have minimum parking spaces as follows</p> <p>Within the CPZ, 3 per 30 students Buffer zone, 5 per 30 students Beyond, 10 per 30 students</p> <p>In relation to minimum numbers proposed for residential parking based on bedrooms, the SPD should</p>	<p>Request for more parking at PBS and on residential dwellings noted.</p> <p>The Student PBSA buffer zone policy removed on advice of DCC Head of Traffic and response to multiple representations who questioned whether this policy was workable due to the transient nature of CPZ boundaries.</p> <p>The Council have noted the consultation comments and agreed with several representations that made the case that garages over a certain size (6m x 3m for a single or 6m x 6m for a double) should be counted as a parking space or two parking spaces when a double garage is provided.</p> <p>While the in-curtilage parking spaces minimum requirement has increased from the previous consultation, the inclusion of garages as part of the parking provision allows developers to provide parking in a more flexible manner than when garages are not classed as parking spaces.</p> <p>Minimum spaces per property are now set out as whole numbers and have increased from:</p> <ul style="list-style-type: none"> <li>- 1.3 to 2 spaces on 2 beds,</li> <li>- 1.8 to 2 spaces on 3 beds,</li> <li>- 2.3 to 3 spaces on 4 beds,</li> <li>- 2.5 to 3 spaces on 5 beds.</li> </ul>



	<p>recognise the substantial increases in car ownership as a reality of modern life. The minimum number of spaces within the curtilage, excluding garages should be a whole number</p> <p>1 bed 1 space; 2 bed 2 spaces; 3 bed 2 spaces; 4 bed 3 spaces; 5 bed 3 spaces</p> <p>In addition, the number of unallocated spaces should be 2 per dwelling for properties with three or more bedrooms.</p>	<p>A row has been added to the table so that houses with 6 plus beds must have a minimum of 4 in curtilage parking spaces.</p>
<p><b>Matthew Phillips- on behalf of John Lowe, City of Durham Trust</b></p>	<p>*This includes allocated/in curtilage provision- inc parking for apartments and PBSAs</p> <p>Unfortunately, the Council has failed to ask the prior and fundamental question of whether the <b>allocated</b> parking standards are appropriate, despite a significant increase in the requirement compared with the <i>Issues and Options</i> draft. The Statement of Consultation shows that two respondents to the previous exercise asked for higher rates of residential car parking. One of those had an exaggerated view that even 3-bed houses needed four car parking spaces each.</p> <p>Four respondents, including the Trust, argued for a reduction in the parking provision in urban areas. The Council did not seriously engage with the arguments advanced for reduction.</p> <p>The new draft requires allocated in-curtilage parking spaces which can be fractional in number per dwelling. For example, for a 3 bed dwelling 1.8 spaces would be required. A note above the table explains that the provision can be “calculated or used as an average across a development site”. The Trust's interpretation is that for a development of ten 3-bed dwellings, a total of 18 in-curtilage spaces would be required, and the</p>	<p>The Council have noted the consultation comments and agreed with several representations that made the case that garages over a certain size (6m x 3m for a single or 6m x 6m for a double) should be counted as a parking space or two parking spaces when a double garage is provided.</p> <p>While the in-curtilage parking spaces minimum requirement has increased from the previous consultation, the inclusion of garages as part of the parking provision allows developers to provide parking in a more flexible manner than when garages are not classed as parking spaces. Minimum allocated in curtilage parking guidance has been amended and increased to allow garages over a certain size to be classed as a parking space. Minimum spaces per property are now set out as whole numbers and have increased from:</p> <ul style="list-style-type: none"> <li>- 1.3 to 2 spaces on 2 beds,</li> <li>- 1.8 to 2 spaces on 3 beds,</li> <li>- 2.3 to 3 spaces on 4 beds,</li> <li>- 2.5 to 3 spaces on 5 beds.</li> </ul> <p>A row has been added to table 5 so that houses with 6 plus beds must have a minimum of 4 in curtilage parking spaces.</p> <p>Residential accommodation provided as flats or apartments will be expected to conform to the same standards as above.</p> <p>The Student PBSA buffer zone policy removed on advice of DCC Head of Traffic</p>

	<p>developers could provide these by having eight dwellings with two spaces, and two dwellings with one parking space each.</p> <p>The problem with this approach is that the needs of householders change over time. When the development is occupied, perhaps half of the 3-bed households might have only one car. The people living in the houses with only one space each are no less likely to end up buying a second car than any of the others. The Trust is not advocating for the car parking provision to be rounded up further to 2 spaces per 3-bed house, but would like to see greater flexibility in provision being encouraged, by providing the fractional spaces as unallocated off-curtilage parking which can be used by residents, visitors, or users of other facilities in mixed developments. The 2019 Parking and Accessibility Standards took this approach, with 3-bed dwellings being required to have one in-curtilage space and 2 spaces per three dwellings off curtilage.</p> <p>Such an approach would be consistent with <i>Manual for Streets</i> which suggests in paragraph 8.3.11 that a combination of allocated and unallocated parking “can often be the most appropriate solution” to provide residential parking and notes several advantages including reducing the land-take through providing only for the average levels of car ownership and catering for car parking demand in mixed-use areas across the day. This can also reduce the need to provide for parking at destinations. To test the efficiency of the Council's proposed model, the Trust has carried out analysis of parking demand and dwelling types using 2011 census data, which is presented in the Appendix. The Council's model would provide car parking at a level exceeding the demand. In over 400 of the county's 1727 census output areas, over half</p>	<p>and response to multiple representations who questioned whether this policy was workable due to the transient nature of CPZ boundaries.</p>
--	---	--

of the in-curtilage car parking would go unused. In a further 961 areas between 25% and 50% of the allocated provision would be likely to be unused. These areas are shown in red and orange hatching respectively in the following map. The black hatched areas have very high car ownership, and the Council's model may slightly under-provide. Although they look significant, they are relatively underpopulated and amount to only 23 census output areas.

These Trust's main conclusions are:

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

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

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

	<p>Bedrooms In-curtilage spaces  Unallocated spaces  1 0 1 per 10 dwellings  2 0 1 per 2 dwellings  3 1 1 per 2 dwellings  4 2 1 per 3 dwellings  5+ 3 2 per 3 dwellings</p> <p>With more time, it would be possible to extend the analysis and recommend policies better tailored to the urban and rural situations, or where sites can be made more sustainable through other transport interventions. For example, the “sustainable urban extensions” to Durham City proposed for Bent House Lane and Sniperley should be expected to attain a lower rate of car parking provision by providing improved walking/cycle routes and public transport penetrating the sites.</p> <p><b>Effects of over-provision of residential car parking</b>  There are several downsides to providing more car parking than is actually needed. In-curtilage car parking occupies a lot of land, which could otherwise be used for gardens, communal amenities or for increasing the density of development. Vehicle crossings of the footway to access private drives make the street environment more hazardous for children. Obliging developers to provide residential car parking at the rates proposed in the SPD will increase house prices or reduce viability of developments, especially for dwellings with 1 to 3 bedrooms.</p> <p>It will also reduce the viability of public transport and active travel, making the residents more car-dependent.</p> <p>This problem is well understood in the professional literature and in independent policy recommendations. An RTPi research paper, “<i>Settlement patterns, urban form &amp; sustainability: an evidence review</i>”, May 2018, section 3.5</p>	
--	---	--

(pages 17 to 18)1 covers the evidence on the spatial principles which encourage accessibility by sustainable transport.

For good bus accessibility, housing densities of 50 to 100 dwellings per hectare (dph) are recommended. This figure is quoted in the Committee on Climate Change report "*UK housing: fit for the future?*", February 2019 (page 106)2.

Examples of higher density development in Durham City include Victorian terraces such as 1-42 The Avenue, at about 48 dph, Leazes Place at about 60 dph, Lawson Terrace, Mistletoe Street, etc. at over 70 dph, and the modern development of Kirkwood Drive at about 44 dph.

Those densities were achieved without including flats, and with the exception of Kirkwood Drive the majority of the car parking is on-street, rather than in-curtilage.

Transport planning, land use planning, and the response to the climate emergency must go hand in hand. If the Council requires a higher rate of residential car parking than is justified by the evidence, this will steer developers away from the very design solutions which are needed to help the shift to sustainable transport and tackle carbon emissions.

\*taken from q6 response-  
**Residential car parking for apartments, etc.**

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

The Trust is of the view that for apartment blocks the in-curtilage car parking can be most effectively delivered if it is not exclusively

allocated by apartment. Because of the variation in the number of cars per household, even between dwellings of similar sizes, providing sufficient car parking allocated to each individual flat will be inefficient, as the spaces allocated to households with fewer vehicles will remain unoccupied. Therefore, a common pool of parking spaces is the best arrangement. It may be that the management company of the apartments would want to control the allocation via an annual rental of parking spaces, in conjunction with a travel plan.

The average (mean) number of cars or vans per County Durham household at the 2011 census was 1.1. Although the Trust has no evidence to offer on the vehicle ownership of apartment dwellers, it seems unlikely that this average would be very much exceeded, unless the apartments were aimed at the very top end of the market.

In order to provide some visitor parking spaces, a rate of provision of around 1.2 to 1.3 parking spaces per apartment might be appropriate, though this could be reduced if the location was highly accessible, or if the apartments had very few bedrooms.

**Car parking for PBSAs and the Durham City CPZ**

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

	<p>The map of the buffer zone, in Figure 3, is flawed.</p> <ul style="list-style-type: none"><li>• At the simplest level it does not include the whole of the CPZ: controlled parking was extended to Fieldhouse Lane and other parts of North End in recent years.</li><li>• While technically the peninsula might be outside the CPZ, showing the CPZ boundary as running along the middle of the Wear and on the alignment of the A690 is not helpful, as the buffer zone then includes South Street, the western side of New Elvet, and the bottom end of Claypath, despite the fact that parking is highly restricted on the bailey.</li><li>• Similarly, it is unnecessary to include in the buffer zone those areas which do not actually have any uncontrolled car parking nearby. For example, the terraced streets to the north of Hawthorn Terrace are shown in the buffer zone, but the area immediately outside the CPZ boundary is the route of the East Coast Main Line and Redhills Lane.</li></ul> <p>Land on the west side of South Road is in the buffer zone because the land to the east (part of the university campus) is private and not covered by the CPZ.</p> <ul style="list-style-type: none"><li>• Other anomalies include the Milburngate House site, outside the CPZ and the buffer zone, while Sidegate is shown as inside the buffer zone.</li></ul> <p>In fact, if you look at the land included in the buffer zone, there is hardly any developable land within the zone, and most of it is not within 100m of unrestricted residential car parking.</p> <p>Even if the map were to be redrawn, the policy will still be ineffective in managing the problem of overspill accommodation by students. It is well known that the University's policy is to provide no car parking at college accommodation except for a very limited number of students. Most of the PBSA sites allocated by</p>	
--	--	--

Policy 16.2 of the County Durham Plan are situated outside the CPZ or within the buffer zone. Previous Parking and Accessibility Standards required the same rate of car parking provision (1 per 15 students) as in the draft SPD, yet the colleges on Mount Oswald were approved with minimal car parking. Is it the Planning Authority's intention to enforce the SPD's requirement for car parking in the face of the University's policy on student parking? The University's policy forms part of its Travel Plan, which has been adopted as a condition of other grants of planning permission.

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

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

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



<p><b>City of Durham Parish Council</b></p>	<p>*This includes allocated/in curtilage provision</p> <p>The Parish Council has concerns that the draft does not seek feedback on the level of allocated residential parking spaces in new development and whether this is effective. It is considered that there should be greater flexibility in parking provision, for example through unallocated parking spaces which could be used by residents and/ or visitors. Also, there is a need to better understand parking demand depending on the size of the dwelling.</p>	<p>Comment Noted</p>
<p><b>Michelle Robinson, (Stantec) on behalf of Bellway homes</b></p>	<p>*This includes allocated/in curtilage provision- Garages, Driveways</p> <p>Bellway Homes strongly object to the exclusion of garages from the parking requirements within Table 5. Particularly when there is an inherent suggestion in the Residential Amenity SPD that garages are included. Paragraph 2.31 requires:</p> <p>“The provision of car-parking spaces on the plot remain in accordance with the Council’s Parking requirements to compensate for the loss of the garage.”</p> <p>The minimum standard sizes required for garages implies that they are suitable for parking a car and therefore should be counted towards the parking requirements. If the garage is not being counted as a parking space then there should be no requirement to meet the minimum standards.</p> <p>Bellway’s view is that the parking standards are extremely excessive given that the garages are excluded particularly for the larger properties. This can create challenges for good design and layout. An approach should be taken like Newcastle City Council. Newcastle City Council’s “Transport Assessments, Travel Plans and Parking1” require minimum dimensions for garages (in line with those proposed at Durham)</p>	<p>The Council have noted the consultation comments and agreed with several representations that made the case that garages over a certain size (6m x 3m for a single or 6m x 6m for a double) should be counted as a parking space or two parking spaces when a double garage is provided.</p> <p>While the in-curtilage parking spaces minimum requirement has increased from the previous consultation, the inclusion of garages as part of the parking provision allows developers to provide parking in a more flexible manner than when garages are not classed as parking spaces.</p> <p>Minimum allocated in curtilage parking guidance has been amended and increased to allow garages over a certain size to be classed as a parking space. Minimum spaces per property are now set out as whole numbers and have increased from:</p> <ul style="list-style-type: none"> <li>- 1.3 to 2 spaces on 2 beds,</li> <li>- 1.8 to 2 spaces on 3 beds,</li> <li>- 2.3 to 3 spaces on 4 beds,</li> <li>- 2.5 to 3 spaces on 5 beds.</li> <li>-</li> </ul> <p>A row has been added to table 5 so that houses with 6 plus beds must have a minimum of 4 in curtilage parking spaces.</p>

but garages which meet these minimum sizes are counted towards the parking provision. Where the minimum size requirements are not met, then the garage counts as only half a car parking space. Bellway Homes will maintain any objection which does not provide garages with appropriate recognition.

The approach against how the parking standards will be applied across a residential site is also unclear. It is understood from paragraph 4.3 that the minimum allocated in curtilage parking provision can be calculated or used as an average across a development site. However, the SPD would benefit from some worked examples.

The parking standards should also not be rigidly applied and the opportunity for more sustainable transport measures should be taken into account. A proportionate system could be applied whereby the proportion of car parking spaces can be reduced if there are additional cycling opportunities or public transport facilities introduced. This could be presented in a clear matrix or with a calculation.

This would also help to address Air Quality issues across the County as well as address climate change by encouraging modal shift. For example this could include Bellways' site in Durham City which is adjacent to the Park and Ride and its removal from the Green Belt was to maximise the number of journeys undertaken by sustainable means such as walking, cycling and public transport (see para 4.93 of the County Durham Plan).

From June, all new residential properties have to be fitted with an EV chargepoint as a requirement of Building Regulations. The SPD should either avoid the repetition of the Building Regulations or reflect them in full.

**Chris Martin-  
Pegasus Group  
on behalf of  
Miller Homes**

\*This includes allocated/in curtilage provision- Garages, Driveways

The Parking and Accessibility SPD includes Table 5 which sets out residential parking standards, and states that the minimum requirement excludes garages. A footnote to the table confirms that “\*Although garages are excluded from the parking provisions in this table it is still recommended that garage sizes comply with the minimum garage sizes – 6.0 metres x 3.0 metres for a single garage: or 6.0 x 6.0 metres for a double garage...”.

This approach suggests that houses should still provide garages which are large enough to be counted as a parking space, but that parking requirements will be calculated excluding garage spaces. The parking requirements per dwelling have also increased from the previous SPD, such that more parking spaces will be required on street and in plot both to meet the requirement and to compensate for the inability to include garages.

Residents expect larger houses to include integrated garages; it is felt that the approach as drafted in the SPD will lead to over-provision, essentially requiring parking spaces in addition to garages, with associated detrimental impacts on housing layout, for example decreasing the amount of landscaping space/ potential for gaps between dwellings when considering overall housing layouts.

Alongside this, it is suggested that both the Parking and Accessibility SPD and the existing Highways Design Guide SPD be updated to include a requirement for all estate roads to be 5.5m wide regardless of the size of the development (previously on developments of less than 100 properties, the minimum width of the road could be reduced to 4.8m). Firstly, it is noted that this

The Council have noted the consultation comments and agreed with several representations that made the case that garages over a certain size (6m x 3m for a single or 6m x 6m for a double) should be counted as a parking space or two parking spaces when a double garage is provided.

While the in-curtilage parking spaces minimum requirement has increased from the previous consultation, the inclusion of garages as part of the parking provision allows developers to provide parking in a more flexible manner than when garages are not classed as parking spaces.

Minimum allocated in curtilage parking guidance has been amended and increased to allow garages over a certain size to be classed as a parking space. Minimum spaces per property are now set out as whole numbers and have increased from:

- 1.3 to 2 spaces on 2 beds,
- 1.8 to 2 spaces on 3 beds,
- 2.3 to 3 spaces on 4 beds,
- 2.5 to 3 spaces on 5 beds.
- 

A row has been added to table 5 so that houses with 6 plus beds must have a minimum of 4 in curtilage parking spaces.

Officers consider that increasing all road widths to 5.5m will allow them to accommodate modern road vehicles including increasing numbers of delivery vehicles and accommodate more on street parking.

Therefore, it is recommended that the change to the requirement for a minimum road width of 5.5m on sites of under 100 dwellings remains in the final adopted version of the Highways Design Guide. However, it is also recommended that a footnote will be added to state that the standard will be applied more flexibly when an application is for a reserved matters application or for a subsequent phase of an older development where the previously approved or built out phase of the development had minimum road widths of 4.8m.

	<p>reduces the opportunity to deliver a street hierarchy in larger developments, which adds interest and variety to large-scale residential housing layouts.</p> <p>Secondly, we recommend that a cumulative view should be taken in regard to the potential impacts of both wider roads and higher parking requirements on residential sites, as alongside the potentially detrimental impact on housing layouts this could cumulatively reduce the amount of land likely to be available to deliver housing figures on identified and potential sites.</p>	
<p><b>Lichfields- on behalf of Taylor Wimpey</b></p>	<p>*This includes allocated/in curtilage provision- Garages, Driveways</p> <p><b>Residential Parking Standards</b> Taylor Wimpey, in principle have no objection to the revised parking standards, however, this is on the basis that 6mx3m garages continue to be counted as a parking space.</p> <p>Although there is some evidence that there is a general reduction in the use of garages to store cars, this should be considered in relation to a number of factors. Manual for Streets (MfS) states that there should be a number of factors to be considered when assessing if a garage should be fully counted as a parking space. These factors include:</p> <ul style="list-style-type: none"> <li>• the availability of other spaces, including on-street parking – where this is limited, residents are more likely to park in their garages;</li> <li>• the availability of separate cycle parking and general storage capacity – garages are often used or storing bicycles and other household items; and</li> <li>• the size of the garage – larger garages can be used for both storage and car parking</li> </ul> <p>The first point above highlights that people are more likely to park a car within a garage where the availability of other spaces is limited. This supports the inclusion of garages as</p>	<p>The Council have noted the consultation comments and agreed with several representations that made the case that garages over a certain size (6m x 3m for a single or 6m x 6m for a double) should be counted as a parking space or two parking spaces when a double garage is provided.</p> <p>While the in-curtilage parking spaces minimum requirement has increased from the previous consultation, the inclusion of garages as part of the parking provision allows developers to provide parking in a more flexible manner than when garages are not classed as parking spaces.</p> <p>Minimum allocated in curtilage parking guidance has been amended and increased to allow garages over a certain size to be classed as a parking space. Minimum spaces per property are now set out as whole numbers and have increased from:</p> <ul style="list-style-type: none"> <li>- 1.3 to 2 spaces on 2 beds,</li> <li>- 1.8 to 2 spaces on 3 beds,</li> <li>- 2.3 to 3 spaces on 4 beds,</li> <li>- 2.5 to 3 spaces on 5 beds.</li> </ul> <p>A row has been added to table 5 so that houses with 6 plus beds must have a minimum of 4 in curtilage parking spaces.</p>

	<p>parking spaces, expecting people to utilise these if their car ownership exceeds the spaces available outside of this.</p> <p>The second and third points highlight that people are likely to use their garages as storage space. The requirement of all garages to be 6mx3m allows for garages to be used both to store cars and cycles and/or household items.</p> <p>The above demonstrates that the use of garages as parking spaces can be encouraged by limiting the availability of other spaces and providing garages sized to store cars alongside cycles and/or other household items.</p> <p>the viability of developments due to an increased land-take associated with the increased number of on-plot parking spaces and drainage requirements but will impact on the design of the streetscene and surface water drainage strategy.</p> <p>With regard to the viability of developments, the Local Plan Viability, including the Site Allocations Viability Assessment was undertaken based upon existing parking standards. These increased standards could have impacts on both viability and the ability of allocated and non-allocated sites to deliver the anticipated number of dwellings should land-take associated with each dwelling increase.</p> <p>With respect to the impact on the streetscene, paragraph 86 of the National Design Guide states that well-designed parking is attractive, well-landscaped and sensitively integrated into the built form so that it does not dominate the development or the street scene. To require all parking spaces to be external to garages is likely to result in a parking dominated development in conflict with the aims of the National Design Guide.</p>	
--	---	--

	<p>To summarise, TW would suggest that where garages are 3mx6m they can be included as a parking space for the following reasons:</p> <ul style="list-style-type: none"> <li>• They are sized to store a car alongside a bicycle and/or general household paraphernalia;</li> <li>• A lesser number of alternative car parking spaces has been demonstrated to encourage the use of garages to store cars; and</li> <li>• This would allow for a less car dominated street scene in line with the National Design Guide.</li> </ul> <p>TW are also aware of concerns regarding residents converting existing garages to offices/gyms. In most instances managing car parking standards to encourage garage parking will be sufficient to discourage this. In some circumstances this can be controlled, either by the removal of permitted development rights associated with making external changes, or through the addition of an appropriately worded planning condition to ensure that garages are retained as parking spaces.</p> <p><i>Impacts of Not Including Garages as a Parking Space</i></p> <p>To not include sufficiently sized garages as parking space will result in a greater number of on-plot parking spaces being required and longer/ wider drives being necessary. This will not only impact on</p>	
<p><b>Persimmon</b></p>	<p>*This includes allocated/in curtilage provision- Garages, Driveways</p> <p>Residential Parking Standards</p> <p>Persimmon Homes object to the proposed Residential Parking Standards set out in Table 5 of the SPD. The minimum car parking standards proposes a significant increase in the parking requirement of the County which will have a significant impact on the number of private parking bays required to be incorporated into a development. As</p>	<p>The Council have noted the consultation comments and agreed with several representations that made the case that garages over a certain size (6m x 3m for a single or 6m x 6m for a double) should be counted as a parking space or two parking spaces when a double garage is provided.</p> <p>While the in-curtilage parking spaces minimum requirement has increased from the previous consultation, the inclusion of garages as part of the parking provision allows developers to provide parking in a more flexible manner than when garages are not classed as parking spaces.</p>

	<p>this representing will go on to explain the minimum standards appear to, in no way reflect or be informed by, the local car ownership level (contrary to NPPF para 107) and will, if adopted, negatively impact the design of development creating car dominated street scenes and in no way promoting alternative means of transport or allowing parking to be incorporated into developments to make high quality places (contrary to NPPF para 104) or place great strain on viability or efficiency of developments to the detriment of meeting the Housing Target.</p> <p>To emphasise this point Persimmon Homes have undertaken an exercise looking at the site layout for our 48 unit Aykley Heads Phase 2 development, which was minded to grant consent subject to s106 in May 2022.</p> <p>Plan 1 appended to this representation shows the consented scheme which delivers 64no. in curtilage parking spaces which represents an average provision of 1.3 dedicated spaces / dwelling. This is above the level of local car ownership in County Durham of 1.1 cars / dwelling and resulted in a scheme, from a design perspective, that was considered acceptable by the Council Design Review Panel.</p> <p>Plan 2 appended to this representation shows the consented scheme with a parking provision compliant with the proposed SPD standards. Compliance with the proposed Parking Standards would require the provision of an additional 24no. in curtilage parking spaces to be provided (total of 88no. in curtilage parking) and would represent a parking provision of 1.8 dedicated spaces / dwelling against a local car ownership rate of 1.1/dwelling.</p>	<p>Minimum allocated in curtilage parking guidance has been amended and increased to allow garages over a certain size to be classed as a parking space. Minimum spaces per property are now set out as whole numbers and have increased from:</p> <ul style="list-style-type: none"> <li>- 1.3 to 2 spaces on 2 beds,</li> <li>- 1.8 to 2 spaces on 3 beds,</li> <li>- 2.3 to 3 spaces on 4 beds,</li> <li>- 2.5 to 3 spaces on 5 beds.</li> </ul> <p>A row has been added to table 5 so that houses with 6 plus beds must have a minimum of 4 in curtilage parking spaces.</p> <p>Expected minimum length for driveways reduced from 6m to 5.5m in the updated SPD and clarity on width required (4.7m) for double driveways.</p>
--	---	---

	<p>As can be seen on the plan 2 the effect of complying with this parking standard on the design and street scene is stark with a sea of car dominance created, particularly in areas of smaller 2 and 3 bed dwellings. From a “design-led” perspective, at a time where dominance of the car on the street scene and the current extent of hardstanding for parking raised is regularly identified as problematic issues on the majority of application, resulting in negative/red resulting against BfL assessments at Design Review Panel, it is clear to see that compliance with the proposed parking standards increases drastically the private parking provision only exacerbating this situation resulting in less soft landscaped areas which can be utilised for screen planting and tree planting.</p> <p>It is noted that the SPD seeks to also require that all garages be provided as a minimum 6x3m to “allow garages to accommodate the car and storage of cycles and other items”. As this representation will go onto to discuss it is entirely illogical to require garages to be provided at dimension to allow the parking of a car whilst not permitting their provision to be counted as a parking space If garages are provided at dimensions to large enough to accommodate a car it is entirely logically that they would be used as such.</p> <p>Reverting back to plan 2 assuming all garages were provided at 6x3m and utilised as parking spaces this would further increase the parking provision made on site to 103 dedicated parking spaces which would further increase the provision / dwelling to 2.1 / dwelling, almost double the local car ownership level of 1.1/dwelling.</p> <p>The implication of the proposed parking standard in combination with</p>	
--	--	--



	<p>the design expectations of the BfL design panel has only one logical outcome, a significant reduction in development density. Given the evidence provided above in respect to the level of parking provision required by the standards and the apparent total disregard for association to local car ownership levels (as required by NPPF para 107) Persimmon Homes further consider that</p> <p>the parking standards are contrary to para 124 of the NPPF which directs that “planning policies... should support development that makes efficient use of land”. Clearly requiring a parking provision way in excess of the evidenced car ownership levels of the region is a fundamentally inefficient use of land.</p> <p>The wider consequence of this inefficient land use and effect of density reduction is that full compliance with the proposed parking standards, and the density reduction required to do so, would drastically reduce the viability of sites across the county; particularly in medium and low viability areas. Additionally, even in high viability areas where development could potentially still come forward viably the parking provision and associated required density constraints it would create would significantly reduce the housing yield. In combination this will place great strain the ability of the Council to achieve the Housing Target.</p> <p>Persimmon Homes accept that the 2022 SPD proposes a reduction on visitor parking spaces across developments from previous policy. This reduction from 1:3 to 1:4, has no doubt been considered and influenced the council’s decision to increase the required in-curtilage parking as an offset to the loss of visitor bays.</p> <p>In practise however DCC Highways dept. since 2014 have always</p>	
--	---	--

accepted that 1:4 visitor parking provision has been adequate and have allowed this on all developments since, and therefore in reality, provision in accordance with the new SPD is in fact not a reduction in visitor parking below the number that are currently provided.

We would therefore propose that an increase in garage dimensions to 6x3m, a size which the SPD considers large enough to both accommodate a vehicle and providing necessary cycle/mobility scooter storage with the acceptance that this garage will now provide an in-curtilage parking for the plot.

Maintaining the current driveway in-curtilage parking requirement i.e. 1no drive parking for 1-3 bedroom plots and 2no drive parking for 4+ bedroom plots while also requiring a 6x3m garage would provide an additional in curtilage garage space for the majority of our 3 bedroom properties as well as all of our 4 & 5 bedroom types The result would be an increase of in-curtilage parking across the development as a whole of in excess of 1:2, with no detriment to the overall design/street scene.

Persimmon Home also wish to raise a wider issue in regards to increased parking requirements on residential dwellings. In line with local and national requirements, most developments are accompanied by a Travel Plan document, which sets targets for reduced dependency on vehicular transport generated from a development and are required to promote alternative modes of transport through potential funding, cost incentives, or awareness schemes. Future traffic counts are required to demonstrate that these initiatives are working, or if they are not, then alternative measures may be required. These initiatives will be significantly undermined if the practicalities of vehicular usage are

increased and it will become significantly more difficult to incentivise residents to use alternative modes of transport. This puts greater uncertainty on the level of funding / discounts required to incentivise this, which could lead to larger costs for the developer in order to counteract the ease of vehicle usage.

#### Residential Garages

The proposed increase in the required size of garages to accommodate storage while still being able to accommodate a car only makes sense if the garage counted towards the total in-curtilage parking provision. If they are not to be accepted by the Council as contributing as parking, then they must only be considered as storage for cycles, mobility scooters, motorbikes, lawnmowers etc. and the justification for the 6x3m dimensions falls away.

Accordingly Persimmon Homes suggest that the requirement for 6m x 3m garages is retained and counted towards the parking provision within the in curtilage provision.

#### Driveway Standards

Paragraph 4.11 requires that "Driveways must also be a minimum of 6m long..." Persimmon Homes object to this approach and suggest flexibility should be included within the guidance to allow for driveway lengths to be reduced by 0.5m in instances where roller-shutter garage doors are to be utilised, as has been permitted historically.

Additionally where double length drives are proposed with up and over garage doors; the guidance should include further flexibility that the additional 0.5m of driveway length shall only be required once (i.e. double length drive 6m + 5.5m) as this factors in the need for additional space but disregards the need for

	<p>the further additional space for the vehicle parked nearest the road.</p>	
<p><b>Lichfields on behalf of Theakstons Ltd</b></p>	<p>*This includes allocated/in curtilage provision- Garages, Driveways</p> <p><b>Residential Parking Standards</b> Our client, in principle has no objection to the revised parking standards, however, this is on the basis that 6mx3m garages continue to be counted as a parking space. The principle of encouraging 6mx3m garages is predicated on ensuring that they are sized appropriately to accommodate modern cars therefore we query the justification for excluding them as a recognised parking space.</p> <p>Although there is some evidence that there is a general reduction in the use of garages to store cars, this should be considered in relation to a number of factors. Manual for Streets (MfS) states that there should be a number of factors to be considered when assessing if a garage should be fully counted as a parking space. These factors include:</p> <ul style="list-style-type: none"> <li>• the availability of other spaces, including on-street parking – where this is limited, residents are more likely to park in their garages;</li> <li>• the availability of separate cycle parking and general storage capacity – garages are often used or storing bicycles and other household items; and</li> <li>• the size of the garage – larger garages can be used for both storage and car parking</li> </ul> <p>The first point above highlights that people are more likely to park a car within a garage where the availability of other spaces is limited. This supports the inclusion of garages as parking spaces, expecting people to utilise these if their car ownership</p>	<p>The Council have noted the consultation comments and agreed with several representations that made the case that garages over a certain size (6m x 3m for a single or 6m x 6m for a double) should be counted as a parking space or two parking spaces when a double garage is provided.</p> <p>While the in-curtilage parking spaces minimum requirement has increased from the previous consultation, the inclusion of garages as part of the parking provision allows developers to provide parking in a more flexible manner than when garages are not classed as parking spaces.</p> <p>Minimum allocated in curtilage parking guidance has been amended and increased to allow garages over a certain size to be classed as a parking space. Minimum spaces per property are now set out as whole numbers and have increased from:</p> <ul style="list-style-type: none"> <li>- 1.3 to 2 spaces on 2 beds,</li> <li>- 1.8 to 2 spaces on 3 beds,</li> <li>- 2.3 to 3 spaces on 4 beds,</li> <li>- 2.5 to 3 spaces on 5 beds.</li> </ul> <p>A row has been added to table 5 so that houses with 6 plus beds must have a minimum of 4 in curtilage parking spaces.</p>

	<p>exceeds the spaces available outside of this.</p> <p>The second and third points highlight that people are likely to use their garages as storage space. The requirement of all garage to be 6mx3m allows for garages to be used both to store cars and cycles and/or household items.</p> <p>The above demonstrates that the use of garages as parking spaces can be encouraged by limiting the availability of other spaces and providing garages sized to store cars alongside cycles and/or other household items.</p> <p><b><i>Impacts of Not Including Garages as a Parking Space</i></b></p> <p>To not include sufficiently sized garages as parking space will result in a greater number of on-plot parking spaces being required and longer/ wider drives being necessary. This will not only impact on the viability of developments due to an increased land-take associated with the increased number of on-plot parking spaces and drainage requirements but will impact on the design of streetscene.</p> <p>In particular, it could potentially conflict with the increased emphasis recently on including street trees. With regard to the viability of developments, the Local Plan Viability, including the Site Allocations Viability Assessment was undertaken based upon existing parking standards. These increased standards could have impacts on the ability of allocated sites to deliver the anticipated number of dwellings should land-take associated with each dwelling increase.</p> <p>With respect to the impact on the streetscene, paragraph 86 of the National Design Guide states that well-designed parking is attractive, well-landscaped and sensitively integrated into the built form so that it</p>	
--	---	--

does not dominate the development or the street scene. To require all parking spaces to be external to garages is likely to result in a parking dominated development in conflict with the aims of the National Design Guide.

***Residential Non-allocated and Visitor Parking***

The guidance requires non allocated spaces to be provided at a ratio of one space per four dwellings. Our client welcomes the clarification at paragraph 4.9 that this is a “recommended standard” and that the “exact number of non-allocated spaces should be tailored to ensure that quality design solutions can be achieved on sites”.

By way of an example, our client has been able to agree with the Council on certain sites that there would be a justification in terms of the design of the development to provide an over provision of allocated parking spaces instead of the visitor parking spaces. The inclusion of this text in the guidance would still allow such discussions to take place.

***Driveway Standards***

Paragraph 4.10 states that driveways should be constructed from permeable materials where appropriate to allow drainage. Whilst our client welcomes the inclusion of “where appropriate” within this text, it is important to recognise that there are ongoing discussions within the development industry about the effectiveness of permeable paving. In particular, there are concerns relating to its vulnerability to damage during both the construction and operation of the development and also the reliance on individual occupiers to maintain them.

To summarise, our client would suggest that where garages are 3mx6m they can be included as a parking space for the following reasons:

	<ul style="list-style-type: none"> <li>• They are sized to store a car alongside a bicycle and/or general household paraphernalia;</li> <li>• A lesser number of alternative car parking spaces has been demonstrated to encourage the use of garages to store cars; and</li> <li>• This would allow for a less car dominated street scene in line with the National Design Guide.</li> </ul>	
<p><b>Richard Newsome, on behalf of Avant</b></p>	<p>*This includes allocated/in curtilage provision- Garages, Driveways</p> <p>Residential Garages (Table 5 and Paragraph 4.5) AHNE broadly accepts the residential parking standards set out in Table 5 of the SPD. However, it is concerned that the footnote to Table 5 and paragraph 4.5 state that garages are excluded from the parking provisions and there is no explanation as to why they have been excluded. We would note that paragraph 4.5 states that if garages are of the dimensions set out in the SPD (6m x 3m for a single garage and 6m x 6m for a double garage) that they allow garages to accommodate the car and the storage of cycles and other items. Therefore, if they are of suitable dimensions to accommodate a car, cycles, and other items then they should be allowed contribute to the parking provision of a development.</p> <p>Residential Non-allocated and Visitor Parking</p> <p>AHNE welcomes the recommended ratio of non-allocated car parking spaces of 1 space per 4 dwellings as set out in Table 5 and paragraph 4.9 of the SPD. The reference to this being to avoid such parking dominating developments and it being a recommended standard with the exact number of non-allocated</p>	<p>The Council have noted the consultation comments and agreed with several representations that made the case that garages over a certain size (6m x 3m for a single or 6m x 6m for a double) should be counted as a parking space or two parking spaces when a double garage is provided.</p> <p>While the in-curtilage parking spaces minimum requirement has increased from the previous consultation, the inclusion of garages as part of the parking provision allows developers to provide parking in a more flexible manner than when garages are not classed as parking spaces.</p> <p>Minimum allocated in curtilage parking guidance has been amended and increased to allow garages over a certain size to be classed as a parking space. Minimum spaces per property are now set out as whole numbers and have increased from:</p> <ul style="list-style-type: none"> <li>- 1.3 to 2 spaces on 2 beds,</li> <li>- 1.8 to 2 spaces on 3 beds,</li> <li>- 2.3 to 3 spaces on 4 beds,</li> <li>- 2.5 to 3 spaces on 5 beds.</li> <li>-</li> </ul> <p>A row has been added to table 5 so that houses with 6 plus beds must have a minimum of 4 in curtilage parking spaces.</p> <p>Expected minimum length for driveways reduced from 6m to 5.5m in the updated SPD and clarity on width required (4.7m) for double driveways.</p>

spaces being tailored to ensure quality design is supported.

We would be grateful for clarification in the SPD that non-allocated spaces can be located on shared private drives as well as adopted highway. This helps to ensure that a well-distributed provision can be achieved within a site without needing to overly concentrate provision along adopted highways.

Whilst we acknowledge the Council's statement that non-allocated parking should be provided off curtilage as it is counterintuitive for visitors to park in spaces that feels like they are part of someone else's property flexibility needs to be maintained to allow the best design solution for provision. An example is where apartments are proposed and the best design solution would be visitor parking as part of a wider car park arrangement.

#### Driveway Standards

AHNE notes the requirement at paragraph 4.11 for driveways to be a minimum of 6m long and 2.7m wide. However, it is unclear where such measurements should be taken from and to, whether they only apply to driveways in front of garages or also other parking provision, and what the necessary dimensions would be for double or greater width driveways.

The reference to flexibility with regards to driveway dimensions being allowed where appropriate is broadly welcomed. However, the circumstances where this be accepted by the Council remains relatively uncertain and untested. The recognition at paragraph 4.12 that there is a need to balance parking provision, its location and layout with creating good design and attractive and safe places is positive. Utilising a mix of parking formats assists with the design and appearance of the developments. It should be noted that



	tandem parking is an important component of a mixed parking solution as it offers opportunities to allow for landscaping to the front of dwellings in a street scene.	
--	---	--

No. of comments - 9

## Question 6

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

Respondent	Comment	DCC Response
Matthew Phillips- on behalf of John Lowe	<p>The Trust's response to this question is broken down into several sections:</p> <ul style="list-style-type: none"> <li>• Anomalies in the document which ought to be easy to address.</li> <li>• Omissions which reduce the effectiveness of the SPD in furthering national and local policy.</li> <li>• Overall strategy</li> </ul> <p><b>Strategy</b></p> <p>Overall, the City of Durham Trust is profoundly disappointed by the Council's revision of this SPD. The Trust made a very full response to the previous consultation, but many of the suggestions were apparently ignored or dismissed without proper consideration.</p> <p>The Trust supplied comparisons with policies developed by several other local authorities, taking care to select recent examples which comply with the latest national guidance, hoping that the Council could benefit from good practice elsewhere. These comparisons were dismissed with the comment that:</p> <p>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.</p>	<p>The Council did consider the Trusts response at the previous consultation and the evidence within. However, the Council used an evidence base related to TRICS and the also the experience of officers working in the highways team in Durham. While evidence from other LA areas is useful, the Council feel it is most relevant to use experience of officers who have worked on planning applications in the County.</p> <p>In terms of looking at different parking standards in urban, suburban and rural sites, this is something that we have considered, but officers felt it would be difficult for the Council to undertake this level of analysis and preparation of evidence base in a County as diverse as Durham. We have though written into the SPD that parking provision can be reduced at accessible sites where there is a frequent public transport service.</p> <p>This is very general statement, but overspill parking is usually seen as negative thing when considered from a resident's perspective.</p> <p>Although it is impossible for a countywide definition of adequate</p>

	<p>The Council has not explained how Durham TRICS data has been used. There are many possible interpretations of the data, but the Council has not detailed its methodology or even its objectives. Has the Council selected the examples with the highest trip generation, in order to ensure that all parking needs can be accommodated, or instead modelled the policy on sites with a lower proportion of car trips, achieved with the aid of a Travel Plan?</p> <p>Was a high percentage of overspill parking taken to be a bad thing, indicating unsatisfied demand, or a good thing, indicating more efficient land use through use of on-street parking?</p> <p>Did the use of TRICS data take into account that the Durham data may be biased because sites comply with previous iterations of these standards? Have the need for decarbonisation through modal shift and the government's ambitions that half of urban journeys be undertaken by walking or cycling by 2030 been taken into account?</p> <p>Policy 21 of the County Durham Plan, as adopted after amendment by the Inspector, gives as one of the principles for determining car and cycle parking provision "car parking at destinations should be limited to encourage the use of sustainable modes of transport, having regard to the accessibility of the development by walking, cycling, and public transport". Does the SPD limit car parking at destinations in such a way that sustainable transport would be encouraged?</p> <p>Without the evidence of how the proposed rates relate to the expected demand, it is impossible to say. If TRICS data has been used to assess demand, then the rates of provision identified from TRICS</p>	<p>accessibility for walking and cycling, it is now important to cross reference the LCWIP framework in the SPD. The LCWIP framework is referred to in the updated SPD as a tool to reduce parking on development sites.</p> <p>The need to reference walking and cycling to make developments more sustainable was referenced by the Inspector in his final report on the County Durham Plan. It is also part of CDP Policy 21 and has been raised in representations from National Highways and the City of Durham Trust.</p> <p>DCC now have 3 LCWIPs adopted, with another 9 in the latter stages of development. This is an important reference in the SPD as it establishes the LCWIPs (in conjunction with policy 21 of the County Durham Plan) as a tool that decision makers could use to reduce parking at destination development sites.</p> <p>The parking SPD is not the only tool the council use for addressing modal shift. As well as the CDP policy 21, the Council also produce a Cycling Strategy, a Rights of Way Improvement Plan and Local Cycling and Walking Infrastructure Plans and the Strategic Cycling and Walking Delivery Plan as well as the North East Transport Plan.</p> <p>The SPD gives the Council a tool to reduce parking when a location has access to sustainable transport options i.e public transport.</p> <p>The Council agree that shared mobility is one tool to lower car use and Policy 21 of the CDP references car sharing as a sustainable mode of transport</p>
--	--	--

	<p>would need to be reduced by a percentage in order to suppress demand and encourage sustainable transport. What reduction is the Council actually aiming for? And how does this relate to its wider decarbonisation strategy for the county?</p> <p>The Trust therefore continues to challenge an SPD which requires a higher rate of car parking provision than is necessary by comparison with the other authorities, and in particular makes no special provision for urban areas like Durham City. The Trust can refer to examples from Bath, where lower rates of parking provision had been adopted despite higher rates of car ownership.</p> <p>This should give cause for concern as to the appropriateness of the Council's methodology.</p> <p>The tone and emphasis of the Parking and Accessibility SPD seems to be less about accessibility and more about providing plentiful car parking sufficient to meet all anticipated needs. A nod to the climate crisis has been made through active EV charging points and cycle parking.</p> <p>By contrast, the Transport for the North <i>Transport Decarbonisation Strategy</i>, December 2021, imbues a much greater sense of urgency and of the need for dramatic change in transport policy. Here are some excerpts: p. 53 <b>Disincentivising car use and avoiding travel</b></p> <p>In addition to making alternative options more attractive, policies that make car travel less attractive or encourage people to avoid travel altogether should be part of the mix.</p>	<p>above alternative fuel vehicles in order of priority.</p> <p>The council also appreciates the reference to many other tools such as Low Traffic Neighbourhoods (LTNs), Work Place Levy's (WPLs) and 15-20minute neighbourhoods. These policy initiatives all have merit, but these may be more relevant when introducing new strategic transport and planning policy.</p> <p>This SPD must supplement the 'Delivering Sustainable Transport Policy' rather than add new policies.</p> <p>Policy 21 of the CDP that states:</p> <p><i>'car parking at residential developments should ensure that a sufficient level is provided for both occupants and visitors, to minimise potential harm to amenity from footway parking.</i></p> <p><i>On street and footway parking should be avoided where it would have an unacceptable impact on highway safety, or a severe impact on the road network;</i></p>
--	---	---

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

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

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

Use of shared vehicles can be encouraged through the provision of dedicated car club parking spaces combined with stringent parking standards for new development.

The use of planning obligations and the Community Infrastructure Levy can fund shared vehicle provision in new developments.

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

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

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

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

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

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

The Inspector's final report on the County Plan (para. 162) required Policy 21 and the associated SPD to set out “principles that will be used to determine car and cycle parking and storage provision in order to promote sustainable transport”.

The SPD does not demonstrate how it will assist in promoting sustainable transport. The paragraph asked that the policy and SPD “limit the provision of car parking at destinations to encourage

	<p>the use of sustainable modes of transport having regard to accessibility by walking, cycling and public transport”.</p> <p>The SPD makes clear that the standards are not maxima, i.e., they are not limits on the provision of car parking, and the Council said in the Statement of Consultation that maxima could not be justified. The SPD refers to accessibility only in terms of relatively infrequent bus services, and does not have regard to accessibility by walking or cycling.</p> <p>The SPD as drafted does not deliver these requirements of Policy 21.</p> <p>The</p>	
<p>City of Durham Parish Council</p>	<p>The Parish Council questions whether the proposals for car parking provision for purpose-built student accommodation are fit for purpose, particularly given the policy of Durham University on car parking which is to provide very limited parking at college accommodation.</p> <p>This matter needs to be resolved particularly where student parking in residential areas is an issue. It is disappointing that no requirements are included for cycle parking within student accommodation developments nor does the draft cover car or cycle parking at interchanges, or motorcycle parking provision.</p> <p>Furthermore, the draft SPD does not provide any detail regarding the promotion of sustainable transport. It is understood that this was a requirement which was highlighted within the Inspectors report. No reference is made to improving accessibility through walking or cycling (except from the provision of cycle parking within developments).</p>	<p>Comments all noted in preparation of the latest draft of the SPD.</p>
<p><b>Jim Hanrahan (MRTPI)</b> Development Adviser  </p>	<p><b>Durham County Council Parking and Accessibility Supplementary Planning Document (SPD) consultation.</b></p>	<p>Comment noted</p>

<p>Northeast and Yorkshire</p>	<p>Thank you for your email regarding the above named proposed 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 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>In terms of our area of interest, we do not have any comments to make on this Supplementary Planning Document.</p> <p style="text-align: center;">If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.</p>	
<p>Sharon Jenkins Natural England</p>	<p>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.</p> <p>We therefore do not wish to comment.</p>	<p>Comment noted.</p>
<p>Marie Kiddell-Homes Homes England</p>	<p>Homes England recognises the importance of positive outcomes for nature, improving the process for developers, and creating better places for local communities.</p> <p>Homes England does not wish to comment in substantial detail but, following review of the consultation documents, the Council is encouraged to review the content of the proposed documents to ensure it is satisfied that they will provide an appropriate degree of flexibility in the application of the guidance</p>	<p>The SPD is designed to be flexible but within the parameters of Policy 21 of the County Durham Plan – Delivering Sustainable Transport.</p>

	<p>through the development management process.</p> <p>Homes England is supportive of the outcomes that these guidance documents seek to achieve. In certain circumstances, however, it is recognised that it may be beneficial to the overall quality of a scheme, and/or wider development objectives, to accommodate sensible and justified deviations from rigid standards to suit the specific requirements of a site. Hence, the need for flexibility and balance, as appropriate.</p> <p>We trust the above is of use and look forward to continuing to engage with you and consider any further consultation requests as part of the SPD's preparation process, as necessary.</p>	
<p>Catherine Auld- Sunderland Council</p>	<p>Thank you for consulting Sunderland City Council on the following: Development Viability, Affordable Housing and Financial Contributions (SPD); Parking and Accessibility (SPD); and the Residential Amenity Standards (SPD). In addition, Durham City Council's intention to update the Highway Design Guide is also noted.</p> <p>Sunderland City Council has no comments to make on the SPDs at this point in time. The Council also has no comments to make on the proposed change to the Highway Design Guide. However, we welcome the opportunity to be consulted on all upcoming planning consultations in the future.</p>	<p>Comment noted</p>

No. of comments – 6

Total no of comments - 42 comments were received from 20 separate organisations

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)