

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).

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 (June/July 2023)

The SPD was made available on the council's consultation website, with physical copies available on request.

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 in January and February 2021. Following on from this, a second draft of the SPD was prepared and consulted on in May and June 2022. A further third draft of the SPD was prepared and consulted on in June and July 2023. This is a full summary of how the Council responded to the 2023 consultation.

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 guidelines 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 was to establish broadly appropriate standards for parking and accessibility; the second was to seek comments on a drafted SPD. The third was to seek comments on a further draft of the SPD.

Responses

The final consultation process yielded 61 comments from 15 different stakeholders. The tables below show the comments received and the Council’s response to them.

Question 1

Do you agree with the parking standards for non-residential developments which relate to spaces for those with disabilities? Please give reasons for your answers.

Respondent	Comment	DCC Response
Lichfields (on behalf of) Taylor Wimpey	Non-Residential Parking Guidance We welcome the additional clarification added to the latest draft of the SPD, making clear that section 3 and the accessible destination parking guidance within section 2 only apply to non-residential development standards throughout. The additional standalone residential accessibility section is welcomed	Support Noted
Diane Foster	Yes	Support Noted

Lichfields (on behalf of) Co. Durham Land LLP	Non-Residential Parking Guidance We welcome the additional clarification added to the latest draft of the SPD, making clear that section 3 and the accessible destination parking guidance within section 2 only apply to non-residential development standards throughout. The additional standalone residential accessibility section is welcomed.	Support Noted
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<p>John Lowe (Durham City Trust)</p>	<p>The Trust generally supports the approach taken here by the SPD. In addition to the design principles listed in para. 2.6 the Trust would like the SPD to encourage designers to locate the parking for disabled people closer to the destination than the other spaces in the car park. The 1995 advisory leaflet which is referred to in para. 2.7 does include such advice, but it would carry more weight if included explicitly in para. 2.6.</p> <p>Paragraph 2.5 requires a minimum of 2 spaces for disabled people in any car park, or 5% if there are 20 or more parking spaces. That leads to an anomaly that if the car park has exactly 20 spaces, the 5% figure could be used, resulting in a single parking space. The correct formulation is surely that there should be a minimum of two bays for disabled people, with a minimum of 5% for car parks with 40 or more spaces.</p> <p>Here and elsewhere it would be helpful if the SPD could indicate whether partial spaces should always be rounded up, or just rounded to the nearest whole number. For example, if a car park has 48 spaces, 5% of the total would be 2.4. Should that be rounded to 2, the nearest whole number, or rounded up to 3? Dealing with fractional numbers of bays also applies to the EV provision and the rates of parking provision calculated on the basis of the areas of buildings in Tables 1 to 4.</p> <p>In its response to the previous consultation round, Bellway Homes suggested that the SPD would benefit from some worked examples. The Trust supports this suggestion.</p>	<p>Agree that parking spaces for those with disabilities should be closer to the destination than the other spaces. Have put in additional and bullet to para 2.6 to clarify this.</p> <p>Agree with you comment the formulation of disability spaces in 2.6 non-residential parking. This will be amended to 'a minimum of two bays for disabled people, with a minimum of 5% for car parks with 40 or more spaces.</p> <p>The SPD is guidance for all involved in the development industry. Each site will be different, so it is not necessary to be so prescriptive in terms of rounding up numbers. We have used the word minimum when setting out parking spaces required for disability spaces.</p>
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No. of Comments: 4

Question 2

Do you agree with EV charging space provision in non-residential developments for those with disabilities? Please give reasons for your answers.

Respondent	Comment	DCC Response
Joanne Harding- Home Builders Federation	<p>EV Charging</p> <p>30. Our members would suggest the removal of the EV Charging requirements, as this is covered under Building Regulations, and is not a planning matter. The SPD provisions for EV Charging go above and beyond building regulations requirements in circumstances where parking is detached from the property, which in certain situations is not possible to provide.</p>	<p>The text on EV charging requirements was amended after the previous consultation stage to reflect the adoption of Part S of the Building Regulations.</p> <p>While the Council is not convinced about the merit of repeating the entirety of Part S, a summary and a link to Part S feels appropriate in this section. The summary also mentions that there may be exemptions to providing a charge point due to cost.</p>
Diane Foster	Yes	Support noted.
Yvonne Flynn-Durham University	<p>Section 2. Accessibility Guidance</p> <p>2.8 At most new destination car parks, 25% of bays are to have some level of provision for EV charging. Section 3 sets out the specific requirement by use class and the split between active and passive provision. 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>The University supports 2.8 and the provision of accessible charging points within destination car parks.</p>	<p>Support noted for accessible EV bays.</p> <p>Regards the use of EV spaces being not reserved for blue badge users, In Para 2.9 we have stipulated that accessible bays will not be limited to blue badge holders, but this will be monitored to ensure that when demand goes up, blue badge holders will be given priority on accessible charging spaces. We appreciate that this needs to be carefully monitored and this will be monitored</p>

	<p>With regards to 2.9, the University does not support accessible EV charging points being available to non-blue badge holders. Allowing the use of these bays will cause confusion in ineligible drivers, potentially leading to them parking in accessible bays more often, it could cause undue stress and anxiety to EV driving blue-badge holders that find it taken placing an additional burden on their daily life. As the stay to charge an EV can be a relatively long, a blue-badge holder needing somewhere to charge their EV could find themselves excluded from the bay for an excessive amount of time, as the requirement is to provide only one accessible EV bay in a car park, the priority must be to accommodate those that need the space to the exclusion of those with 5% of bays in the car park to choose from. 2.9 should be amended as follows:</p> <p>The use of these bays should be restricted for the sole use of blue badge holders. This would help ensure there is no breaches with the 2010 Equality Act. Accessibility consultants 'Inclusive Design' have provided detailed best practice guidance on making chargepoints accessible to disabled people.</p>	<p>and reviewed on an annual basis by the councils parking and EV teams.</p> <p>Having an accessible EV space in smaller car parks is designed to be more inclusive so people with mobility issues can use the bays easily as well as more able people. We would expect where there is both accessible EV bays and standard EV bays within the same car park, able bodied drivers would use the standard EV bays rather than the accessible bays.</p>
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<p>John Lowe (Durham City Trust)</p>	<p>The Trust criticised the EV charging space provision for disabled people in the previous round of consultation and welcomes the efforts that have now been made to improve the SPD. The previous draft would have resulted in a single disabled parking bay with EV charging in a car park of 200 spaces, and none in any car parks of less than 200 spaces.</p> <p>The new draft has some inconsistencies. Paragraph 2.5 states that for car parks of more than 10 spaces, one of the two disabled parking bays should have EV charging facilities. Paragraph 2.8, on the other hand, does not set a threshold, and says every new destination car park should have a minimum of one disabled parking bay with EV charging (though exceptions for unviability are allowed). The wording in para. 2.5 seems to be consistent with the general requirements for EV charging laid out in para. 3.15 and the Building Regulations. Could the wording in para. 2.8 be adjusted to bring it into line?</p>	<p>Comment Noted. We have added 10 spaces or more to para. 2.8 in line with your suggestion for extra clarity on when an EV accessible bay will be required.</p>
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No. of Comments - 4

Question 3

Do you agree that parking can be reduced on non-residential developments with good access to public transport or to good walking and cycling links? Please provide reasons for your answers.

Respondent	Comment	DCC Response
<p>Diane Foster</p>	<p>Yes</p>	<p>Support noted.</p>
<p>Andrew Haysey</p>	<p>Yes, but you should not be allowing significant development in areas that do not have good access to other transport modes.</p>	<p>Comment Noted.</p>

<p>John Lowe (Durham City Trust)</p>	<p>Yes, in order to promote sustainable transport and support Policy 21, the Parking and Accessibility SPD should in fact encourage all possible means of reducing the demand for car travel to destinations and thereby avoid the need to provide so much car parking. The availability of car parking at destinations is an important factor in determining whether people drive when other options are available.</p> <p>In the Trust's view the SPD does not go far enough in supporting the requirement in Policy 21 that “car parking at destinations should be limited to encourage the use of sustainable modes of transport, having regard to the accessibility of the development by walking, cycling, and public transport”. While those factors are mentioned in section 2 as reasons to allow a reduction in car parking, the attainment of good walking, cycling and public transport accessibility is not sufficiently promoted or incentivised.</p> <p>Please see the response to Q11 for more strategic concerns.</p>	<p>Comment Noted.</p>
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No. of Comments - 3

Question 4

Do you agree with our retail parking guidance as set out in Table 1?

Respondent	Comment	DCC Response
<p>Diane Foster</p>	<p>Yes</p>	<p>Support Noted.</p>

<p>John Lowe (Durham City Trust)</p>	<p>The Trust notes the reasoning in para. 3.6 that electric vehicle charging should not be required for destinations such as smaller supermarkets where stays are very short. Thus Table 1 has no EV charging requirement for supermarkets up to 1000 square metres in area. A supermarket at the top end of this limit would, however, be required to have 80 parking spaces. This is well above the ten space Building Regulations threshold, and should therefore have a single EV charge point and 20% of the remaining spaces provided with cable routes.</p> <p>By contrast, for general retail premises Table 1 appears to require EV charging even for premises less than 200 square metres in area. Such a building would be required to provide up to 8 car parking spaces. The Building Regulations Part S only requires a single EV charging point for car parks of more than 10 spaces. Paragraph 3.15 explains that the Council proposes provision at a rate of 5% of parking spaces, to apply to car parks of more than 20 spaces. If the intention is to require no EV charge points in a car park of less than 10 spaces, which seems reasonable, then Table 1 could be made clearer by recording “n/a” for the small general retail category.</p> <p>At each of the previous two rounds of consultation, the Trust questioned why there was no requirement for any visitor cycle parking for various types of retail (bulky goods, DIY, builders merchants and garden centres). The Council did not address these points directly in either Statement of Consultation. Although many items sold by such retail establishments cannot be carried away by bicycle, these stores are often the only location for obtaining smaller goods as well, such as items of ironmongery, plant seeds, etc. Customers may also visit in order to place an order for home delivery. The Trust continues to suggest that there should be a requirement for four short-stay cycle spaces, irrespective of gross floor area. By chance, the day this response was being drafted, the following appeared on Twitter: (image).</p>	<p>Agreed, the text around smaller supermarkets has been removed and replaced with another cross reference to part S of the building regs. Table 1 has also been amended to fall into line with the regs regards supermarkets under 1000m2 and smaller general retail.</p> <p>The Council notes your comments about providing cycling parking at bulky goods stores but does not think it is necessary to make cycle parking mandatory for bulky goods stores.</p>
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No. of Comments - 2

Question 5

Do you agree with our employment parking guidance as set out in Table 2?

Respondent	Comment	DCC Response
Mr A Shanley – City of Durham Parish Council	<p>Employment Parking Guidance</p> <p>This latest version of the PASPD proposes that at least one parking space should be required per 18m² GFA for all new Office Development and Business Parks (Use Class E) under Table 2. This is a reduction from the previously proposed 1 space per 25m² GFA for this type of development. The Parish Council does not support this and feels that 1 space per 25m² GFA is a more appropriate and less-excessive standard.</p>	<p>The Council support your suggested amendment and have revised the office provision guideline to one space per 25m² in line with the 2019 existing standards.</p>
Diane Foster	<p>I don't agree that hospitals only have 1 space per 5 members of staff yey schools have 1 space for each member of staff.</p> <p>Hospital staff work unsociable hours so have reduced access to public transport and can also be required to cover staff absences etc so may not always be able to car share etc. unless this is taking account of varying shift patterns and is based on the staff that would be on shift at one time.</p>	<p>Comment noted. Teachers have required more parking spaces close to the building for carrying schoolbooks and other learning materials etc</p>

<p>Yvonne Flynn – Durham University</p>	<p>Table 2 - Employment Parking Guidance</p> <p>Office Development & Business Parks – parking requirements</p> <p>Pleased to note our suggestion to consider rewording the Parking Destination tables from ‘*requirement’ to ‘*recommendation’ has been accepted.</p> <p>However, it is still noted that the details regarding parking for office development/ business parks still remains at ‘1 space per 18m2’. We included the following details in our comments in 2022:</p> <p>‘Noted that the proposed parking requirement for parking for office development/ business parks has changed from 1 space per 25m2 to 1 space per 18m2. This equates to roughly a third higher proportion of parking spaces required for the location/building.</p> <p>A new office building on the new standards of 10,000 m2, would require 600 car parking space, 50 long stay, 10 short stay. Car parking provision therefore seems excessive. Using a lower ratio supports developments in accessible locations and reduces parking.</p> <p>As an example, the University’s refurbishment of Bolden House under the new guidance would create a requirement for an extra hundred parking spaces compared to the provision under the current standard.</p> <p>There is a concern that this increase goes against all policies to reduce the number of vehicles coming into the City, it will increase congestion and therefore increase carbon emissions. This, in turn, may also have a negative impact on Durham County Council’s Climate Emergency Action agenda.</p> <p>The University’s preference would be to support the Climate Emergency Action agenda - a reduction in the ratio to 1 space per 32m2. An option to keep the keep original 1 space per 25m2 could be acceptable.’</p>	<p>Support for the heading revision noted.</p> <p>The Council support your suggested amendment and have revised the standard on office development revised to one space per 25m2 in line with the 2019 existing standards.</p> <p>Tables within Section 3</p> <p>Agree with first suggestion. The word ‘ideally’ removed from all the headings related to long stay cycle parking. All the headings now read ‘Long Stay Cycle parking (enclosed, secure and covered)’.</p> <p>Agree with second suggestion. Added ‘car parking’ to the four table footnotes so that the parking recommendations note is applied to the cars rather than cycling standards for example.</p> <p>Not implementing third suggestion because a minimum standard would not reduce parking so would add nothing to the footnote.</p> <p>Agree with fourth suggestion and added the words enclosed, secure and covered in description of what is required for long stay cycle parking.</p>
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All Tables within Section 3

The following suggestions relate to all four tables within Section 3, and in particular to assist with Employment Parking Guidance.

The following is an extract of the table headings, which are the same in all four tables:
Suggestion 1:

Amend the wording within the Long Stay Cycle sections to the following: Long Stay Cycle parking (enclosed secure and covered)

Suggestion 2:

Amend the wording within the * notes regarding ‘*Parking Recommendations’ to the following: *
These guidelines for car parking are not minimum or maximum standards but rather recommendations that are intended to be applied equally across the County. However, where development is situated in an accessible location or in an LCWIP area, as defined in section 2, a lower parking requirement may be negotiated with Highways officers.

Suggestion 3:

Additional wording within the * notes regarding ‘*Parking Recommendations’ as following: **
where located near an accessible cycling infrastructure, then parking requirements are a minimum and cycling spaces should be increased.

Suggestion 4:

Add in the suggested highlighted text in the following text, set out in

Section 3.9 – see below extract:

3.9 Cycle parking should be in a prominent location allowing regular casual observance and be covered, secured and enclosed, if intended for stays of an hour or more. CCTV is also encouraged at long stay cycle parking. For short stay cycle parking, Sheffield stands should be provided as a minimum. Wherever

	possible cycle parking should be located close to main entrances and easy to access from local cycle routes (LTN 1/20).	
John Lowe (Durham City Trust)	<p>Car parking at offices</p> <p>The car parking requirement for office development of 1 space per 18m² is high compared with other local authorities and with previous Durham standards. The 2019 Parking and Accessibility Guidelines required 1 space per 25m² , the current Northumberland rate is 1 space per 30m² , and in evidence at the Issues and Options stage the Trust noted that Cambridge and Nottingham applied rates of 1 per 40m² outside their city centres, and 1 per 100m² within.</p> <p>Considering that there is a greater emphasis than ever before to promote sustainable transport, and that the proposed office parking rates are substantially in excess of the other examples given, the Trust would like to see the rate reduced to no more than 1 space per 30m² , matching Northumberland. (There is further comment, using the office parking as an example, in the answer to Question 8 below.) The Warehousing and Distribution requirement is also double the rate applied in Northumberland.</p>	The Council support your suggested amendment and have revised the standard to one space per 25m ² in line with the 2019 existing standards.

No. of comments - 4

Question 6

Do you agree with our leisure parking guidance as set out in Table 3?

Respondent	Comment	DCC Response
Diane Foster	Yes	Support Noted.

<p>John Lowe (Durham City Trust)</p>	<p>The Trust welcomes the addition of a requirement for visitor cycle parking at theatres and cinemas.</p> <p>The Trust raised the lack of cycle parking provision associated with hot food takeaways in the previous round of consultation, but the Council has not amended the rate nor did the Council give a response to this concern in the Statement of Consultation. Other respondents made the same objections in the previous round of consultation. There seems to be no logical reason why pubs and cafes, along with all other leisure destinations, should be required to provide one long stay cycle parking space per five staff members, but hot food takeaways have no requirement. As for cycle parking for customers, is the Council suggesting that it is impossible to collect hot food from a takeaway by bicycle?</p> <p>It is curious that Places of Worship are the only category of destination in the whole of Tables 1 to 4 where the short stay cycle parking requirement exceeds the car parking requirement (by a factor of three). The rate of cycling provision comes, like for the other categories, from LTN 1/20. With the car parking rate set as it is, the EV charge point would hardly ever apply: there is not one church in Durham City apart from the Cathedral which exceeds 1500 square metres in area: the required car parking would always fall below the Building Regulations threshold for EV charging points. Taking these two considerations together, does this suggest that the car parking requirement has been set too low? This is debatable, as many existing places of worship rely on nearby on-street parking to supplement their own car parks, or are able to arrange to share car parking with businesses whose operating hours do not overlap with use of the place of worship. Car occupancy rates will often be higher, with car sharing being more common.</p>	<p>No cycle parking requirement has been made for hot food takeaways as they are usually found within existing town centres where alternative cycle parking can normally be found nearby. In addition, many people use the delivery option provided at takeaways.</p> <p>Comments on places of worship noted.</p>
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No. of comments – 2

Question 7

Do you agree with our other destination parking guidance as set out in Table 4?

Respondent	Comment	DCC Response
<p>David Friesner</p>	<p>Table 4.</p> <p>All school and College developments (including extensions and rebuilding works) should have an access roadway (on site and within the curtilage) for pupil drop off / pick up immediately adjacent to the established parking</p> <p>Table 4. Clarify Land Use descriptions for 'Further Education Colleges and Primary and Secondary Schools'. For example, at present, it is unclear how guidance would apply to the combined St Bedes Catholic Secondary School and Sixth Form College. Given current congestion levels and on road parking in nearby residential streets by students, observations suggest there should be more a higher ratio of spaces per students eg 1 space per 2-3 students (from 1 space per 4 students) especially for rural locations.</p>	<p>Comments noted. An officer assessing a planning application for a combined Secondary School and Sixth form would need to consider the numbers of students expected for both elements and then assess the parking provision accordingly.</p> <p>Agree that a drop off/pick up lane may be a good idea for secondary and sixth form schools in certain circumstances. This should form part of the travel plan when an application is lodged. A drop off lane could be justified to support car sharing particularly where a site is not located in an accessible (by sustainable transport) location. For example, pupils from some areas in the catchment may not be provided with an affordable or adequate bus service and may rely on parents to drop them off. Access by sustainable modes should be prioritised in accordance with Policy 21 of the County Durham Plan.</p>
<p>Diane Foster</p>	<p>Yes</p>	<p>Support Noted.</p>

<p>Laura Dodd-Lanchester Parish Council</p>	<p>Specific comments</p> <p>Comments relate to the relevant Tables and paragraphs stated in the document.</p> <ul style="list-style-type: none"> • Table 4 Primary and Secondary Schools. Change visitor space from 1 per 50 pupils to 1 visitor per 30 pupils. • Table 4. All school developments should have an access roadway (on site and within the curtilage) for pupil drop off / pick up immediately adjacent to the established parking • Table 4. Clarify Land Use descriptions for 'Further Education Colleges and Primary and Secondary Schools'. For example, at present, it is unclear how guidance would apply to the combined St Bedes Catholic Secondary School and Sixth Form College. Given current congestion levels and on road parking in nearby residential streets by students, observations suggest there should be more a higher ratio of spaces per students eg 1 space per 2-3 students (from 1 space per 4 students) especially for rural locations • Table 4. College developments should have an access roadway (on site and within the curtilage) for pupil drop off / pick up immediately adjacent to the established parking 	<p>Comments noted. An officer assessing a planning application for a combined Secondary School and Sixth form would need to consider the numbers of students expected for both elements and then assess the parking provision accordingly.</p> <p>Agree that a drop off/pick up lane may be a good idea for secondary and sixth form schools in certain circumstances. This should form part of the travel plan when an application is lodged. A drop off lane could be justified to support car sharing particularly where a site is not located in an accessible (by sustainable transport) location. For example, pupils from some areas in the catchment may not be provided with an affordable or adequate bus service and may rely on parents to drop them off.</p> <p>Access by sustainable modes should always be prioritised where possible in accordance with Policy 21 of the County Durham Plan.</p>
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<p>Sunny Ali – Highways England</p>	<p>Parking and Accessibility SPD</p> <p>Definition of an Accessible Destination - (non-residential) We welcome that the definition of an accessible destination (non-residential) is now placed closer to the start of the document.</p> <p>We are however concerned that the Council continues to consider an accessible location to be one where public transport runs at a rate of two per hour or more at peak times. We would reiterate our previous comments in 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. 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.</p> <p>Furthermore, we would draw the Council's attention to Paragraph 48 of Circular 01/2022 where it is stated that developers should demonstrate that the development would be located in an area of high accessibility by sustainable transport modes. We expect development promoters to enable a reduction in the need to travel by private car and prioritise sustainable transport opportunities ahead of capacity enhancements and new connections on the SRN. We would strongly urge the Council to reconsider what is considered an accessible destination in terms of public transport frequency.</p> <p>In relation to cycling, the SPD notes that walking and cycling accessibility is too complex and site specific to set a countywide standard for, and that it will require separate consideration at the planning application stage. We acknowledge that the SPD now makes reference to how 12 Local Walking and Cycling Infrastructure Plans (LCWIPs) have been developed for 12 of Durham's larger settlements. It is noted that where a development is located in an area with an LCWIP, and where a developer can clearly</p>	<p>Acceptable walking and cycling distances are subjective and to some degree, dependent on an individuals' fitness levels as well as local topography. The LCWIP process gives us a tool to help shape our new development sites and incorporate better walking and cycling routes into to new developments.</p> <p>In an ideal world, the council would insist that new developments 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. To have four services an hour in a rural County like Durham would be great, but not currently financially viable.</p> <p>It is also a difficult balance for the Council when assessing new development sites in many of our rural communities. As in other communities across the country, many of our communities have lost 'walkable' employment opportunities which unfortunately, has entrenched car use in many of our communities. Now, these communities have also lost local shops and services, but it is imperative as a Council that we understand the needs of those communities and allow for investment, employment opportunities and the</p>
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	<p>demonstrate that that the development incorporates walking and cycling routes that link directly to the wider walking and cycling network as set out in the LCWIPs, there is an opportunity for officers to limit car parking at these destinations.</p> <p>We acknowledge the geographical complexity of the area which Durham County Council covers, however we believe defining what is considered acceptable walking and cycling accessibility between developments and destinations is necessary. As set out in the Circular 01/2022, recent research on the location of development has found where walking times between new homes and a range of amenities exceeded 30 minutes, car dependency was much more likely to be reinforced.</p> <p>If a development was not able to evidence that they were located within acceptable walking and cycling distances to key destinations, we would not consider that to be located in an area of high accessibility by sustainable transport modes (Circular 01/2022).</p>	<p>housing need in these communities.</p>
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<p>John Lowe (Durham City Trust)</p>	<p>Is the Further Education Colleges category also to apply to Higher Education? If so, this should be made explicit. If not, HE is not covered.</p> <p>As previously represented, the car parking rates for colleges and schools (including nurseries) allow 100% of staff to drive to work, but 28 also provide one cycle space for every 20 members of staff. Transporting students' work to and from home for marking is often given as a reason for teachers needing to use cars. Firstly, this would not normally apply to nursery education, so the requirement can surely be amended there. Secondly, it is clear that historically teachers used to manage to travel without cars, and the cycle parking provision implies that some still do. Options like car sharing are also available, and schools are often well-served by public transport. It seems inequitable in the context of a climate emergency that 100% provision should be planned for teachers and school support staff.</p> <p>St Oswald's Primary School in Durham City has no car parking on site, but the school assists teachers in using the Park and Ride. Durham Johnston School was designed with a car park which does not accommodate all staff. Some staff walk, cycle or use a combination of public transport with these modes.</p> <p>For existing schools applying to build new classrooms, there would be unlikely to be any means of providing additional on-site car parking to meet the proposed standards without converging playground space or playing fields to car park, which would be unsustainable as it would prioritise staff travel needs over the facilities for the children.</p>	<p>The Council has amended Table 4 so that further education guidelines also apply to higher education.</p> <p>The SPD has been amended so that the car parking requirement for schools and further/higher education is reduced from 1 space per member of staff to 1 space per full time member of staff.</p>
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No. of comments – 5

Question 8

Do you have any other specific comments on destination parking guidance?

Respondent	Comment	DCC Response
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Diane Foster	No	Comment noted.
Yvonne Flynn-Durham University	Suggested Amendment to text 3.4 'The destination parking standards' Should this be changed to 'The destination parking guidance'?	Yes, changed, thank you.
Andrew Haysey	Paragraph 1.9 refers to the benefits of having maximum standards, but these are published as recommended levels, which is not the same thing.	Comment noted.

<p>John Lowe (Durham City Trust)</p>	<p>Electric vehicle charging The Trust supports the proposed requirement for 5% of parking spaces to be provided with active EV charge points in car parks over 20 spaces, over and above the Building Regulations requirement for a single space in car parks of more than 10 spaces.</p> <p>The Building Regulations requirement applies to all new buildings, but only applies to buildings undergoing major renovation or material change of use in certain circumstances. For example, if no work is being done to the car park or to its electrical installation, the Building Regulations would not require EV charge points to be added. The Trust is of the view that it would be unreasonable for the additional requirement imposed by the SPD to apply in circumstances where the Building Regulations would exempt the developer from installing charge points or cable routes. If that is the intention of the final sentence of para. 3.16, perhaps this needs to be made clearer.</p> <p>The Trust welcomes the addition of paragraphs 3.17 and 3.18 recommending higher speed charging at sites with a swift turnover, including the exceptions relating to viability.</p> <p>Cycle parking</p> <p>Table 1 uses the word “minimum” throughout the short-stay cycle parking column, but the other tables do not. Para. 3.10 allows for greater provision of cycle parking where supported by a Travel Plan. It would be simple enough to amend the short and long-stay cycle parking headings in Tables 1-4 to state that all the cycle parking rates are minima. Para. 3.10 or para. 2.18 should be amended to indicate that if a reduced level of car parking is agreed then it may be necessary to increase the cycle parking provision.</p> <p>Paragraph 3.9 recommends that destination cycle parking be “covered, secured and enclosed” if intended for stays of an hour or more. By secure, it is understood that access to the storage requires a key or electronic identification of some kind. This is only convenient to arrange for regular users such as employees. There are, however, many types of destination where people tend to stay for more than an hour (e.g. cinemas, places of worship).</p>	<p>Support Noted. The intention is for Part S to be signposted in the SPD rather than the SPD repeat the regulations. Where the SPD goes further than Part S is insisting on at least one ‘accessible’ charging space.</p> <p>Thanks for your suggestions on improved cycling text. As a result, we have removed the minimum reference in table but added ‘and increase cycle parking’ in para. 2.18 as suggested.</p> <p>We have amended para. 3.9 so that CCTV is encouraged for short stay cycle parking as well as long stay cycle parking and removed the line about the 1-hour threshold for short stay parking and agree that cycle parking is more nuanced than this.</p> <p>Agree with your comments on hotel cycling parking and added ‘and 2 spaces per 25 bedrooms’ to long stay cycle parking .</p> <p>Short stay cycle parking has been amended to 1 space per 50m2 which is the same guidance as restaurants and fitness clubs.</p>
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Tables 1 to 4 differentiate between long stay and short stay cycle parking spaces and stipulate the rates for each type. The long stay spaces are described in the table headings as “secure and ideally covered”.

To avoid confusion over the intention of para. 3.9, and to recommend CCTV surveillance of cycle parking generally, not just long stay provision, the Trust suggests amending the wording to read:

Cycle parking should be in a prominent location allowing regular casual observance. CCTV is also encouraged. Long stay cycle parking should be covered, secured and enclosed. For short stay cycle parking ...

There are two types of leisure destination in Table 3 where the visitor provision, as well as the staff provision, should also be secure and covered. For Hotels/Motels/Guest Houses and for Caravan and Camp Sites the Trust suggests that the rate currently shown under “short stay cycle parking” which clearly relates to the number of guests, should be added to the requirements in the “long stay” column. So for example, for hotels there would be no short stay cycle parking requirement, and the long stay requirements would be given as “1 space per 5 members of staff AND 2 spaces per 25 bedrooms”. This would ensure there is secure overnight storage for guests. If a hotel had a restaurant or fitness club open to the public, short stay spaces ought to be provided according to the appropriate rows in Table 3.

Setting destination parking standards

When considering the office car parking requirements (see Q5 above) we used the Employment Densities Guide cited in para. 3.5 to estimate the parking rate in terms of spaces per member of staff. The result was that the number of parking spaces was between 50% and 80% of the number of staff. In the 2011 census 79% of those who travelled to work in the county did so by car, but some of these were passengers. The proportion driving a car was 71%.

On the face of it, therefore, the rate recommended in Table 2 is a reasonable fit for travel habits in County Durham. But the obvious question is, what is the Parking and Accessibility SPD trying to do? Does it support Policy 21 which aims to promote sustainable transport? Because if the Parking and Accessibility SPD merely

attempts to predict and provide for the car parking demand, that does not contribute to the aims of Policy 21, in particular the requirement that “car parking at destinations should be limited to encourage the use of sustainable modes of transport, having regard to the accessibility of the development by walking, cycling, and public transport”.

The only way in which the Parking and Accessibility SPD has regard to the accessibility of the development is by allowing a lower rate of parking to be negotiated with Highways officers (as explained in the footnote to Table 2) or requiring fewer parking spaces “through planning” as mentioned in para. 3.4. This gives officers a considerable degree of leeway. If planning officers will be using some form of sliding scale or rule of thumb when considering the parking requirements, then why is this not included explicitly in the SPD? And if there are no such devices, how will the Planning Authority discharge its responsibilities consistently?

In response to previous representations from the Trust, pointing out lower parking rates defined in other local authority standards, the Council replied that the proposed rates for Durham were based on County Durham TRICS data, and that applying rates from other authorities would not be appropriate. Further explanation was given by Peter Ollivere (email, 13 May 2022) that the TRICS analysis had been informed by the professional experience of the Highways Development Manager (now retired) to formulate the appropriate parking standards. The method behind the TRICS study was not provided.

Even if the TRICS survey sites were carefully selected to avoid skewing the results towards out-of-town and less accessible locations, the main problem with using TRICS data is that it will tend to perpetuate and reinforce the current transport mix. (The census-based observations for office buildings are also flawed in this way.) There is evidence that travel to work in County Durham is sub-optimal in terms of sustainable transport: the Durham City Sustainable Transport Delivery Plan is critical of the readily available free car parking available to employees in the city, including at Durham University and Durham County Council. This culture will be reflected in the local TRICS surveys, which are therefore not necessarily a good guide to what is achievable in modal shift.

<p>John Lowe (Durham City Trust)</p>	<p>Is the Further Education Colleges category also to apply to Higher Education? If so, this should be made explicit. If not, HE is not covered.</p> <p>As previously represented, the car parking rates for colleges and schools (including nurseries) allow 100% of staff to drive to work, but 28 also provide one cycle space for every 20 members of staff. Transporting students' work to and from home for marking is often given as a reason for teachers needing to use cars. Firstly, this would not normally apply to nursery education, so the requirement can surely be amended there. Secondly, it is clear that historically teachers used to manage to travel without cars, and the cycle parking provision implies that some still do. Options like car sharing are also available, and schools are often well-served by public transport. It seems inequitable in the context of a climate emergency that 100% provision should be planned for teachers and school support staff.</p> <p>St Oswald's Primary School in Durham City has no car parking on site, but the school assists teachers in using the Park and Ride. Durham Johnston School was designed with a car park which does not accommodate all staff. Some staff walk, cycle or use a combination of public transport with these modes.</p> <p>For existing schools applying to build new classrooms, there would be unlikely to be any means of providing additional on-site car parking to meet the proposed standards without converging playground space or playing fields to car park, which would be unsustainable as it would prioritise staff travel needs over the facilities for the children.</p>	<p>The SPD has been amended so that the car parking requirement for schools and further/higher education is reduced from 1 space per member of staff to 1 space per full time member of staff.</p>
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No. of comments – 4

Question 9

Do you have any comments on our residential parking guidance as set out in Table 5?

Respondent	Comment	DCC Response
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<p>Bellway Homes</p>	<p>Please see Table 1 below</p> <p>The above table demonstrates the change in Residential Quantity Parking Standards between 2019 and the draft proposals in 2023. As can be seen from the table above developers are now required to provide an additional parking space on all developments from 2 bedrooms upwards against what they were previously required to do. Bellway wishes to understand what factors have changed between 2019 and 2023, that has caused the need for an increased volume of residential car park spaces. Specifically, it would be useful if the Council demonstrate the evidence that justified the lower requirement in 2019 and why this evidence is now considered either outdated or wrong. Bellway notes, the reduced requirement for providing off curtilage parking per dwelling and see it as the correct decision for improving design of street scenes in the county. However, this is insufficient to offset the additional in curtilage parking space requirements.</p>	<p>Getting the parking provision correct on new developments requires striking a delicate balance between the needs of different stakeholders.</p> <p>On residential developments, the Council must consider the needs of residents who require sufficient secure off-street parking and the needs of residents moving around developments, including those with mobility issues. The Council must also consider the principles of good design that make new housing attractive and viable as well as providing sufficient space which limits harm to residential amenity and provides space for service and delivery vehicles. The SPD has been subject to three rounds of consultation, so the Council has had the opportunity to consider a wide range of views from different stakeholders and the different evidence provided as part of this extensive consultation. Although there was some concern over the level of parking being proposed on new residential estates, there was also concerns over a lack of parking in new estates which could lead to vehicles parking on footpaths and verges causing inconvenience and possible safety issues to other residents. The residential parking guidelines are now broadly like those being used in Northumberland which is often used as a comparative authority to Durham and faces many of the same challenges relating to public transport provision, particularly in rural areas, viability and has similar (although slightly higher) car ownership levels. The Council therefore consider the parking standards in the SPD are</p>
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		<p>reasonable and in step with those of similar authorities.</p> <p>The inclusion of garages as counting towards a parking space responds directly to concerns raised by the house building industry as part of the second public consultation phase. We understand the concerns of the Home Builders Federation around viability; however, our emerging evidence indicates that the new requirements will not have a significant impact on viability of new housing sites. This assumes that the additional parking requirement is unlikely to have a significant impact on the overall housing yield given the scope to absorb this within incidental, left over spaces and private curtilage. Housing delivery in County Durham will however be monitored closely as part of our Annual Monitoring Report and if this SPD is having an adverse impact, the Council will consider a review of the parking guidelines.</p>
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<p>David Friesner</p>	<p>Table 5. Residential Parking Guidance.</p> <p>Your current proposed minimums need to be increased to take account of,</p> <ul style="list-style-type: none"> • Families in the household growing up and staying longer in the family home / home extensions • More 4-5 bedroom housing mix on developments • Residents having to travel further afield to / from their place of work • Reductions in public transport provision • Increasing rural isolation and limited job opportunities • Local employment limitations and challenges <p>Car downsizing to small local run-around car and additional cars for all family members</p> <p>Table 5. Residential Parking Guidance. Increase proposed minimums, as follows:</p> <ul style="list-style-type: none"> • 3 bedroom. Increase minimum from 2 to 3 per dwelling • 4 bedroom. Increase minimum from 3 to 4 per dwelling • 5 bedroom. Increase minimum from 3 to 4 per dwelling • 6+ bedroom. Increase minimum from 4 to 5 per dwelling 	<p>Getting the parking provision correct on new developments requires striking a delicate balance between the needs of different stakeholders.</p> <p>On residential developments, the Council must consider the needs of residents who require sufficient secure off-street parking and the needs of residents moving around developments, including those with mobility issues. The Council must also consider the principles of good design that make new housing attractive and viable as well as providing sufficient space which limits harm to residential amenity and provides space for service and delivery vehicles. The SPD has been subject to three rounds of consultation, so the Council has had the opportunity to consider a wide range of views from different stakeholders and the different evidence provided as part of this extensive consultation. Although there was some concern over the level of parking being proposed on new residential estates, there was also concerns over a lack of parking in new estates which could lead to vehicles parking on footpaths and verges causing inconvenience and possible safety issues to other residents. The residential parking guidelines are now broadly like those being used in Northumberland which is often used as a comparative authority to Durham and faces many of the same challenges relating to public transport provision, particularly in rural areas, viability and has similar (although slightly higher) car ownership levels. The Council therefore consider the parking standards in the SPD are</p>
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		<p>reasonable and in step with those of similar authorities.</p> <p>The inclusion of garages as counting towards a parking space responds directly to concerns raised by the house building industry as part of the second public consultation phase. We understand the concerns of the Home Builders Federation around viability; however, our emerging evidence indicates that the new requirements will not have a significant impact on viability of new housing sites. This assumes that the additional parking requirement is unlikely to have a significant impact on the overall housing yield given the scope to absorb this within incidental, left over spaces and private curtilage. Housing delivery in County Durham will however be monitored closely as part of our Annual Monitoring Report and if this SPD is having an adverse impact, the Council will consider a review of the parking guidelines.</p>
<p>Diane Foster</p>	<p>Yes</p>	<p>Support Noted</p>

<p>Yvonne Flynn – Durham University</p>	<p>Queries relating to Table 5:</p> <p>1. Is the CPZ the same area as that set out in the 2022 consultation document? 2. Is 1 space per 15 students outside the CPZ too high? Would this be the same as the parking requirements set out in Section 3 in the *notes under each table e.g. These guidelines for car parking are not minimum or maximum standards but rather recommendations that are intended to be applied equally across the County. However, where development is situated in an accessible location or in an LCWIP area, as defined in section 2, a lower parking requirement may be negotiated with Highways officers. 3. Regarding the number of cycle spaces for Purpose-Built Student Accommodation (PBSA), is the 'long stay parking space per bedroom' too high? Noted in the 2019 SPD stated that: 'where no garage is provided which meets the minimum garage size standard, 2 long stay cycle spaces per 5 bedrooms (40%) should be provided' Is this an option for consideration in the new guidance? At 4.17 & 4.18 there should be reference to the design standards required for cycle parking at PBSAs, we suggest referring developers to 3.08 to 3.14</p>	<ol style="list-style-type: none"> 1. The CPZ area is not the same area as consulted upon in 2022. It was decided the 2022 CPZ with buffer zone was not fit for purpose because of the fluidity of CPZ areas which does not have Local Plan designation status or subject to Local Plan examination. The Student PBSA buffer zone policy was therefore 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. 2. The Council feels 1 space per 15 students outside of a CPZ area is appropriate, but if the site was in a particularly sustainable location, a case could be made when submitting an application. 3. 1 per bedroom is based on LTN 1/20 <p>We have added a cross reference in para 4.18 so it matches with section 3, thank you for this suggestion.</p> <p>We have amended para 3.4 so it states destination parking guidance.</p>
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<p>Laura Dodd – Lanchester Parish Council</p>	<p>Table 5. Residential Parking Guidance.</p> <p>Your current proposed minimums need to be increased to take account of evolving householder demographics as families grow up, housing specifications, increasing social and job mobility demands, reductions in public transport provision, increasing rural isolation and local employment limitations and challenges – all requiring households to invest in additional cars. All spaces should be contained within the curtilage.</p> <ul style="list-style-type: none"> • 3 bedroom. Increase minimum from 2 to 3 per dwelling • 4 bedroom. Increase minimum from 3 to 4 per dwelling • 5 bedroom. Increase minimum from 3 to 4 per dwelling • 6+ bedroom. Increase minimum from 4 to 5 per dwelling 	<p>Getting the parking provision correct on new developments requires striking a delicate balance between the needs of different stakeholders.</p> <p>On residential developments, the Council must consider the needs of residents who require sufficient secure off-street parking and the needs of residents moving around developments, including those with mobility issues. The Council must also consider the principles of good design that make new housing attractive and viable as well as providing sufficient space which limits harm to residential amenity and provides space for service and delivery vehicles.</p> <p>The SPD has been subject to three rounds of consultation, so the Council has had the opportunity to consider a wide range of views from different stakeholders and the different evidence provided as part of this extensive consultation. Although there was some concern over the level of parking being proposed on new residential estates, there was also concerns over a lack of parking in new estates which could lead to vehicles parking on footpaths and verges causing inconvenience and possible safety issues to other residents.</p> <p>The residential parking guidelines are now broadly like those being used in Northumberland which is often used as a comparative authority to Durham and faces many of the same challenges relating to public transport provision, particularly in rural areas, viability and has similar (although slightly higher) car ownership levels. The Council therefore consider the parking</p>
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		<p>standards in the SPD are reasonable and in step with those of similar authorities.</p> <p>The inclusion of garages as counting towards a parking space responds directly to concerns raised by the house building industry as part of the second public consultation phase. We understand the concerns of the Home Builders Federation around viability; however, our emerging evidence indicates that the new requirements will not have a significant impact on viability of new housing sites. This assumes that the additional parking requirement is unlikely to have a significant impact on the overall housing yield given the scope to absorb this within incidental, left over spaces and private curtilage. Housing delivery in County Durham will however be monitored closely as part of our Annual Monitoring Report and if this SPD is having an adverse impact, the Council will consider a review of the parking guidelines.</p>
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<p>Sunny Ali – Highways England</p>	<p>Public Transport Accessibility in Residential Locations</p> <p>This section makes reference to how higher density housing should be located close to public transport routes and that the maximum walking distance to the nearest bus stop from any residential property should ideally not be greater than 400m. The SPD notes that in a rural County like Durham, this is an ideal rather than a standard as it is recognised that many rural villages and towns are not served by a frequent bus service. We would query whether the proposed development “would be located in an area of high accessibility by sustainable transport modes” (Circular 01/2022), if a 400m walking distance to a bus stop was not achievable, and therefore whether the location was suitable for development. Our previous comments in relation to non-residential locations are also applicable here. In line with this, we believe it would be beneficial for greater detail to be included on what the Council deem to be acceptable cycling and walking distances for residential developments to key destinations.</p>	<p>Acceptable walking and cycling distances are subjective and to some degree, dependent on an individuals’ fitness levels as well as local topography. The LCWIP process gives us a tool to help shape our new development sites and incorporate better walking and cycling routes into to new developments.</p> <p>In an ideal world, the council would insist that new developments 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. To have four services an hour in a rural County like Durham would be great, but not currently financially viable.</p> <p>It is also a difficult balance for the Council when assessing new development sites in many of our rural communities. As in other communities across the country, many of our communities have lost ‘walkable’ employment opportunities which unfortunately, has entrenched car use in many of our communities. Now, these communities have also lost local shops and services, but it is imperative as a Council that we understand the needs of those communities and allow for investment, employment opportunities and the housing need in these communities.</p>
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<p>Andrew Haysey</p>	<p>Requirements in Table 5 seem excessive, especially for large houses. The effect of this likely to lead to poor design - Building For A Healthy Life specifically warns against over reliance on integral garages with frontage driveways.</p> <p>Other drawbacks from such high levels of parking requirements include:</p> <ul style="list-style-type: none"> - lower density development and making poorer use of available land. The effect of this is likely to be higher house prices and increased pressure on green belt; - high levels of hard standing, much of which is unused, with consequent implications for flood risk (permeable materials often require regular maintenance so cannot be relied upon), and overall design (again). - given the increase in minimum road width to 5.5 metres it is likely that many people will choose to park on street regardless of off street provision. This reinforces the above points about waste of land and poor design being a likely consequence. 	<p>Getting the parking provision correct on new developments requires striking a delicate balance between the needs of different stakeholders.</p> <p>On residential developments, the Council must consider the needs of residents who require sufficient secure off-street parking and the needs of residents moving around developments, including those with mobility issues. The Council must also consider the principles of good design that make new housing attractive and viable as well as providing sufficient space which limits harm to residential amenity and provides space for service and delivery vehicles.</p> <p>The SPD has been subject to three rounds of consultation, so the Council has had the opportunity to consider a wide range of views from different stakeholders and the different evidence provided as part of this extensive consultation. Although there was some concern over the level of parking being proposed on new residential estates, there was also concerns over a lack of parking in new estates which could lead to vehicles parking on footpaths and verges causing inconvenience and possible safety issues to other residents.</p> <p>The residential parking guidelines are now broadly like those being used in Northumberland which is often used as a comparative authority to Durham and faces many of the same challenges relating to public transport provision, particularly in rural areas, viability and has similar (although slightly higher) car ownership levels. The Council therefore consider the parking</p>
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		<p>standards in the SPD are reasonable and in step with those of similar authorities.</p> <p>The inclusion of garages as counting towards a parking space responds directly to concerns raised by the house building industry as part of the second public consultation phase. We understand the concerns of the Home Builders Federation around viability; however, our emerging evidence indicates that the new requirements will not have a significant impact on viability of new housing sites. This assumes that the additional parking requirement is unlikely to have a significant impact on the overall housing yield given the scope to absorb this within incidental, left over spaces and private curtilage. Housing delivery in County Durham will however be monitored closely as part of our Annual Monitoring Report and if this SPD is having an adverse impact, the Council will consider a review of the parking guidelines.</p>
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<p>John Lowe (Durham City Trust)</p>	<p>First the Trust notes that although the Council has amended the Proposed SPD to allow garage spaces to count towards the required residential allocation, the heading of the second column of Table 5 still suggests that the allocation is to be provided on the driveway of the dwelling. This should be amended if garage spaces are to be counted.</p> <p>Residential parking rates</p> <p>The overall effect, after consultation in 2021 and 2022, of each revision of the Parking and Accessibility SPD has been to increase the requirement for residential car parking. The Trust offered census-based evidence in each round on consultation demonstrating the likely overprovision, but the Council appeared to react instead to unevidenced assertions.</p> <p>30 The latest revision does allow garages to be counted, but many dwellings with 1 to 3 bedrooms, and some with 4 or more, do not have garages, and the revision represents a real increase over the previous drafts. Various housebuilders responded to the previous consultation round to object to garages not being counted towards the parking total, but this was often in the context of judging the car parking rates to be too high. They were described as “extremely excessive” by Bellway, and Persimmon gave the example of the Aykley Heads Phase 2 development, where 33 of the 48 houses had no garage anyway, and yet the new standards would have resulted in a significant over-provision of car parking. By allowing garages now to count towards the total, but increasing the in-curtilage requirements further, the Council has not addressed the actual issues.</p> <p>Persimmon also objected that over-provision of car parking would make it challenging to achieve Travel Plan targets:</p> <p>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.</p>	<p>Thanks, you for your comments, the heading in the second column of table 5 has been amended as per your suggestion.</p> <p>Getting the parking provision correct on new developments requires striking a delicate balance between the needs of different stakeholders. On residential developments, the Council must consider the needs of residents who require sufficient secure off-street parking and the needs of residents moving around developments, including those with mobility issues. The Council must also consider the principles of good design that make new housing attractive and viable as well as providing sufficient space which limits harm to residential amenity and provides space for service and delivery vehicles.</p> <p>The SPD has been subject to three rounds of consultation, so the Council has had the opportunity to consider a wide range of views from different stakeholders and the different evidence provided as part of this extensive consultation. Although there was some concern over the level of parking being proposed on new residential estates, there was also concerns over a lack of parking in new estates which could lead to vehicles parking on footpaths and verges causing inconvenience and possible safety issues to other residents.</p> <p>The residential parking guidelines are now broadly like those being used in Northumberland which is often used as a comparative authority to Durham and faces many of the same challenges relating to public transport</p>
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	<p>Bellway suggested a proportionate system where cycling or public transport accessibility could allow a reduction in car parking requirements “presented in a clear matrix or with a calculation”, and pointed to the potential benefits in addressing air quality issues and tackling climate change.</p> <p>Other professional bodies like the Urban Design Group advise against over-provision of residential car parking:</p> <p>Provision of 2 -3 parking spaces per house results in more space used for parking and lower housing densities of about 30 homes per hectare or less, making public transport unviable. A properly conducted sustainability assessment will condemn these standards. Today, it is recognised that parking provision should be tailored to location. Street design standards: current and withdrawn practice: briefing sheet (2020)¹</p> <p>Bearing in mind that NPPF para. 107 requires consideration of local car ownership rates when defining parking policies, the Trust has analysed the 2021 census data across the county and at Middle Super Output Area level. The analysis shows that at current rates of car ownership:</p> <ul style="list-style-type: none"> • 63% of parking spaces at 1-bed dwellings would go unused • 60% of parking spaces at 2-bed dwellings would go unused, and 84% of 2-bed households would have more in-curtilage spaces than they require • between 40% and 50% of in-curtilage parking spaces for larger dwellings would go unused <p>If the Council's proposed rates of residential car parking could be applied retrospectively to the 234,773 households across County Durham, 47% of the in-curtilage spaces would not be required, and the land occupied would be sufficient for over 10,000 houses (at 30 dwellings per hectare).</p> <p>It is imperative to consider whether a significant uplift in car parking provision for new</p>	<p>provision, particularly in rural areas, viability and has similar (although slightly higher) car ownership levels. The Council therefore consider the parking standards in the SPD are reasonable and in step with those of similar authorities.</p> <p>The inclusion of garages as counting towards a parking space responds directly to concerns raised by the house building industry as part of the second public consultation phase. We understand the concerns of the Home Builders Federation around viability; however, our emerging evidence indicates that the new requirements will not have a significant impact on viability of new housing sites. This assumes that the additional parking requirement is unlikely to have a significant impact on the overall housing yield given the scope to absorb this within incidental, left over spaces and private curtilage. Housing delivery in County Durham will however be monitored closely as part of our Annual Monitoring Report and if this SPD is having an adverse impact, the Council will consider a review of the parking guidelines.</p>
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	<p>developments, by comparison with existing housing, is necessary or desirable. By setting minimum rates across the county which clearly exceed current need, the Council is not conforming with Section 11 of the NPPF “Making effective use of land”.</p> <p>Even on a policy principle of “predict and provide” the car parking allocations substantially exceed what is necessary. Yet various council and national policies seek to reduce car use, including the Local Transport Plan 3, the Durham City Sustainable Transport Delivery Plan and the Climate Emergency Response Plan 2. The Council should have a starting assumption that new housing developments will, through travel plans, public transport accessibility, and walking and cycling links, begin to deliver on these strategic policy objectives. The draft Solar Energy SPD includes a brief section on the climate emergency and how the SPD supports national targets. The Parking and Accessibility should equally be able to demonstrate support of rapid transport decarbonisation.</p> <p>Excessive car parking allocations conflict with other aspects of planning policy.</p> <ul style="list-style-type: none"> • Policy 21 requires development to provide “appropriate, well designed, permeable and direct routes for walking, cycling and bus access”. Having to find room for car parking and for active travel routes will reduce density and make developments less viable. • Increased car parking provision will make it harder to comply with Policy 26 requirements for green infrastructure. Developers 31 also increasingly recognise the value that people place on green infrastructure and active travel connections in housing developments, but the exact car parking provision rates of the SPD are likely to take precedence in the design stages over the qualitative requirements of Policy 26. • The Building for Life SPD asks that residential car parking be well integrated so that it “does not dominate the street”. The Parking and Accessibility SPD discourages overreliance on 	
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tandem parking (para. 4.12). Two-bedroomed properties rarely have garages, and even a 4-bedroomed house with garage would need to provide two further spaces. With the car parking required to be in-curtilage, it would be hard to avoid tandem parking without having a street frontage dominated by driveway for car parking.

In its response to the 2021 consultation, the Trust proposed a different model for residential car parking, based on 2011 census data. A more thorough analysis, using 2021 census data, has now been carried out. The methodology and results are presented in the Appendix. The data and software which performed the analysis are available on request.

The Trust suggests that, in order to comply with NPPF para. 107(d), a banded system of allocation should be used. Each census Middle Super Output Area would be assigned to one of three bands according to whether a higher, medium or lower level of car parking is required.

Rather than stipulating an exact minimum number of in-curtilage parking spaces per dwelling, a table would allow developers to select a mix of in-curtilage and unallocated parking which would provide sufficient car parking for the area but which would also allow more varied design approaches which can respond to the local context, supporting the Building for Life SPD and the draft County Durham Design Code SPD. A higher proportion of unallocated parking would allow for more efficient use of land, and enable better green infrastructure and active travel provision, but for properties at the higher end of the market, more in-curtilage spaces could be provided where justified as an option.

The full results of the Trust's analysis, including proposed allocation tables, are in the Appendix.

The Trust would be very willing to meet with officers to explain the proposed approach and

	<p>answer questions if this would be of assistance .</p> <p>Circumstances for reducing car parking provision</p> <p>Para. 4.3 allows for consideration of deviation from the guidelines if this can be justified and evidenced for reasons such as sustainability, design or viability .</p> <p>The Trust considers that this is weak. While Policy 21 requires a sufficient level of car parking for both occupants and visitors, there are many ways to help reduce demand for car parking and support sustainable transport. The Parking and Accessibility SPD should be actively encouraging developers to reduce the car parking demand through better integration of active travel opportunities, public transport, and shared ownership of vehicles (e.g. via car club facilities). This would support policy initiatives including the Council's Climate Emergency Response Plan 2, where the "vision for 2045" includes "individual car ownership is less common".</p> <p>Purpose-built student accommodation: car parking</p> <p>The SPD proposes a rate of one car parking space per fifteen students outside the Durham City CPZ and none within.</p> <p>The University's policy is not to issue parking permits to students except in very few circumstances. Therefore many students who bring cars to Durham either use them rarely or compete with other potential users of the on-street car parking near the University . The University also operates a subsidised bus travel scheme with a daily flat-rate ticket for Arriva buses . The University's Travel Plan aims to reduce the numbers of students using a car to get to the campus below the rate of around 5% reported in recent travel surveys.</p> <p>The Trust therefore supports the policy of requiring no student car parking for PBSAs within the CPZ.</p>	
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Nevertheless, the construction of some PBSAs has led to pressure for parking on residential streets . John Snow College and South College are both outside the CPZ and have little car parking for students, in keeping with the University's policy . Residents in the new housing on Mount Oswald are finding that some students are keeping cars on the estate . It would not be at all desirable to provide car parking for students at colleges which are so close to the University.

32 The Trust suggests that if a PBSA site is within 2km (about 30 minutes' walk) of the University (measured from the Bill Bryson Library) or has good bus connections to the University, then the requirement for student car parking should generally be reduced, with instead the SPD offering the option of extending the CPZ to streets neighbouring the PBSA. The presumption should be that enhanced bus services or active travel routes should be explored and provided in preference to student car parking.

The Trust notes the response to the 2022 consultation from Belmont Parish Council suggesting much larger quantities of car parking for students, including for parents and other visitors. The Trust's view is that allowing for dedicated car parking for visitors would be inefficient use of land, as it would be very much less likely to be used outside weekends. But it is important for all operators of PBSAs to have workable and effective plans for managing the arrival and departure of students and their belongings at the start and end of the academic year, and minimising the impact on local residents. This should form part of the Travel Plan for all PBSAs. It would be helpful to articulate these issues within the SPD.

Purpose-built student accommodation: cycle parking

The cycle parking rate for Purpose Built Student Accommodation, at 1 long-stay space per bedroom, matches LTN 1/20. The LTN 1/20 figure is a general rate for all types of

	<p>residential accommodation apart from sheltered housing and nursing homes. The rate makes sense for houses, where a family who cycle regularly might well have one cycle each. For PBSAs, provision at a rate of 1 space per bedroom might substantially exceed current demand: nationally about 40% of people own or have access to a cycle. Allowing for some growth in demand, the Trust would be happy to see the requirement reduced to 1 space per two bedrooms, especially if there is a Travel Plan commitment to monitor the usage, and if the plans identify space that can be used to extend the provision.</p>	
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No. of comments – 8

Question 10

Do you have any other comments on our residential parking guidance as set out in in the rest of chapter 4?

Respondent	Comment	DCC Response
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<p>Dennis Younger</p>	<p>I just wondered if there is any scope within the document to assess parking and accessibility issues around (geographically surrounding) the proposed development</p> <p>I give an example:</p> <p>Livin currently and the previous Council housing departments have provided of road (garage /parking) across three sites within Fishburn Colliery this has been a very long standing arrangement, since the area was landscaped using EU moneys back in the 1980s .</p> <p>This has kept around an average 50 vehicles of the streets.</p> <p>Livin have now decided to give notice to all garage owners to vacate and remove those garages as they are not going to provide this service in the future.</p> <p>The rumour is that Livin are looking to build houses on these sites, although i have spoken to Livin by phone and they say they have no plans for the sites and don't know what they will do with the land.</p> <p>Potentially removing those off road parking spots would have a severe impact on the existing streets which every year become more congested.</p> <p>The old layout of the estate means that there is limited off road parking within it, this is limited to a few houses on the streets facing the main road.</p> <p>Anyone who purchases an electric vehicle would need to pass the cable over the footpath if they could get to the back of there house which isn't guaranteed.</p> <p>The last thing that Fishburn Colliery needs is low cost housing as the average price down here is around 70/80k and a substantial number are already rental properties.</p>	<p>The SPD itself is not used as a tool to assess planning permissions for change of use applications to residential. However, the policies contained within the County Durham Plan would be used to assess the potential for change of use to residential on this site and then this SPD would be used to guide the quantum of parking contained on any proposed residential site.</p> <p>In terms of future proofing housing for Electric Vehicles, the Council are involved and delivering a number of projects that seek to increase access to EV chargers, particularly for residents who do not have off-street parking.</p> <p>The Council are delivering two separate projects, one of which seeks to install new EV charging bays in residential areas where there are existing or potential communal parking areas and another which enables residents to locate charging cables in a gulley inserted in the pavement outside their homes. For more details, please contact the DCC Low Carbon team.</p>
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What we do need is Livin and the Council to look toward the future needs of the current population in regard parking, traffic flow and provision of electric points for charging. These garage spaces would be ideal for this purpose.

If these three sites were put forward for housing development the irony would be that the only people with guaranteed parking and charging would be the very people who had substantially made the lives of the people in the surrounding streets significantly more difficult.

so what i am asking is : is there any provision with in the documents to assess change of use ? of land set aside for parking and if so is there any requirement on the planning committee to assess the impact on or detriment to the surrounding areas. Of course this would only impact infill sites. Unless alternate parking facilities are to be provided within the project which would negate the plan. Also at what point will the council be starting to look at older estates with a view to making them suitable for the green age and improving infrastructure to enable this? once again many thanks.

<p>Lichfields (on behalf of) Taylor Wimpey</p>	<p>Residential Parking Guidance – Parking Standards</p> <p>TW are pleased to see that the residential parking standards have been updated to allow for appropriately sized garages to contribute to meeting parking requirements.</p> <p>We kindly refer DCC to consider the detailed comments regarding parking standards that have been submitted by the Home Builders Federation (HBF) in response to this consultation. TW support the concerns raised by the HBF with regards to the parking requirements within residential developments and the knock-on effect in terms of density, design and drainage.</p> <p>Residential Parking Guidance – Accessibility</p> <p>TW welcome the inclusion of detail within the updated draft SPD to include guidance on public transport accessibility in residential developments. As highlighted in TW’s response to the 2022 consultation, should this definition of an ‘accessible destination’ be used to control the location of new housing in the County, it is essential 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>We welcome the clarification made within this section of the SPD, that the walking distances to bus stops listed are ‘ideal’ rather than a fixed requirement with regards to residential development. However, we request there is further consideration given to the distances listed and the instances in which these distances may not be achievable. The below sections set out TW’s stance on these matters, reflective of their response to the previous draft of this SPD.</p> <p>What is the ‘ideal’ distance?</p>	<p>Support for inclusion of garages and section on public transport accessibility noted.</p> <p>Paragraph 4.23 works well in its current form and Council not convinced adding semi-rural will enhance the clarity of this paragraph. The section allows for flexibility and negotiation on a site-by-site basis while highlighting the importance of providing public transport on development sites.</p>
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We raise significant 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. As highlighted within our submission to the previous iteration of this SPD, it is also recognised that people are willing to walk a longer distance to a well-served bus stop, Chartered Institution of Highways and Transportation (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 still 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)'

As raised previously, 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.

We maintain that the stated 'ideal' figure is overly restrictive to the delivery of sustainable development and must be altered to reflect the up to date evidence. On the basis of up to date

evidence, the 'ideal' distance should be no less than 600m.

Should a strict walking distance to bus stops be required?

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 "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."

TW welcome the inclusion of the wording 'ideally' within the SPD text with regards to these distances, and the acknowledgement that these distances may not be achievable in rural locations within the County. However, greater clarification must be provided with regard to what other factors should be taken into account when assessing when any ideal distances are listed.

A large proportion of County Durham is semi-rural, where walking distances are significantly greater than in urban areas. Given the huge variety of settlements within County Durham, it is requested that paragraph 4.23 is updated to ensure flexibility within semi-rural and village locations as well as just rural locations as currently noted in this paragraph.

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 within 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.’

It is essential that the ‘Public Transport Accessibility in Residential Locations’ section of the draft SPD is updated to reflect the variety of instances in which the ideal walking distance may not be achievable, while rightly ensuring that public transport accessibility remains a priority for residential development in the County. It is important to acknowledge that this guidance should not be the sole factor in determining whether a housing site is suitably located for the purposes of meeting policy tests such as Policy 6 of the County Durham Plan.

Ensuring accessibility through viable and quality bus services

In line with the above recommendations that other factors are taken into account when considering accessibility, we wish to highlight the importance of ensuring that the bus services which are accessible are meeting the needs of the residents within reach. 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. To restrict growth in the settlements with already limited bus services could not only result in a failure to deliver the housing

	<p>required for the County, but would also risk the viability of bus services.</p> <p>Further clarification is requested in relation to the contribution and management measures set out within paragraph 4.25 to ensure viable public transport 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/discounted bus passes. This benefit should not be lost based upon a strict application of an acceptable walking distance to a bus stop.</p>	
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<p>Mr A Shanley – City of Durham Parish Council</p>	<p>Off-street parking provision</p> <p>The Parish Council particularly welcomes the proposal to amend the earlier draft of this document so that garages are now to be included in the calculation for in-curtilage parking space. As you are aware, Durham City has its own Controlled Parking Zone (CPZ) and on-street parking is a significant issue. It is right therefore that the garage (where it meets the size standard set out at point 4.5 of this SPD) should be included in the calculation for in-curtilage, off-street parking provision when a resident (whether student or permanent resident), who has a garage, applies for parking permits.</p> <p>The Parish Council commend the parking services team at Durham County Council for their extensive review into the allocation of permits in 2022, as we requested. This has highlighted a number of cases where permits had previously been granted but where the resident had sufficient in-curtilage parking for 2 vehicles.</p> <p>Removing permitted development rights</p> <p>For the reasons set out above, the Parish Council very much welcomes the proposal (set out at para 4.6 of this SPD) to remove permitted development rights in order to control the future loss of garages, car ports and other parking spaces provided in new development. However, the Parish Council feels that this should also be applied to all existing streets and not simply to all newly proposed streets at (presumably) application stage. The County Council should also specify the criteria by which it will assess such issues in this document so as to avoid any inconsistencies. The conversion of garages to habitable rooms (such as bedrooms) seems to be a growing issue in Durham City as student landlords seek to maximise their return on investment by increasing the capacity for new bedspaces within properties and this must be addressed.</p> <p>Provision of EV charging points</p>	<p>Support for garages counting as a parking space noted.</p> <p>Support for the consideration of removal of PD rights noted.</p> <p>Para 4.20 clarifies that and EV chargepoint should be provided for every new dwelling therefore no need to address this in 4.19.</p> <p>The SPD does set out cycling parking requirements at PBSAs and also promotes the incorporation of sustainable transport into development sites in accordance with Policy 21 of the County Durham Plan.</p> <p>400m is the distance recommended by the Chartered Institute of Highways and, see Pg. 30 of guidance below:</p> <p>https://www.ciht.org.uk/media/4465/planning_for_walking_-_long_-_april_2015.pdf</p>
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The Parish Council very much welcomes all proposals to increase EV charging points across the county. In the consultation briefing note, the Council sets out that this latest version of this SPD proposes a “requirement that all new homes should have an electric vehicle (EV) charging point (minimum 7 kW) in accordance with part S of the building regulations” yet para. 4.19 specifies “all residential developments” – an all-encompassing phrase which could be read as including alterations to and/or extension to existing dwellings. Can this be clarified please?

Parking Standards

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. 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 standards for long-stay cycle parking at either public / major interchanges.

Furthermore, this 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).

Public transport accessibility

The Council has updated their definition of public transport accessibility at section 2.14 of this document. Whilst the Parish Council welcomes the intention of setting a maximum distance from various public transport links as well as the defined frequency of public transport services (such as bus services for

instance), the maximum distance of 400m is far too high and should be lowered. Firstly, it is unclear from this document whether this should be interpreted as 400m 'as the crow flies' or as a maximum walking distance. Government guidance is that, in residential areas, bus stops should be located ideally so that nobody in the neighbourhood is required to walk more than 400 metres from their home.

Moreover, an obvious omission from criteria, set out in the table at section 2.14, is consideration of the topography of the site itself and how this might affect the maximum distances to a public transport link, e.g., if a bus stop is uphill from a development site, the maximum distance should surely be reduced accordingly.

<p>Bellway Homes</p>	<p>3. Garages</p> <p>Bellway welcome the flexibility afforded through the ability to include garages as a parking space so long as they are 6mx3m in area. This is a much-welcomed improvement to the previous consultation where minimum sizes were set but they were not recognised as a parking space. We view it as logical and sensible approach.</p> <p>However, we wish to stress that the benefits of this approach would have been greater had the overall requirements for parking spaces not be proposed to increase through this SPD. The decision to increase the overall requirements for parking, make the benefits which come 12 from the inclusion of garages as parking spaces, in a best-case scenario reduced, and in a worst-case scenario redundant.</p> <p>4. Efficient use of Land</p> <p>Paragraph 124 of the NPPF is clear that planning policies and planning decisions should support development which makes efficient use of the land. The parking requirements as currently proposed will lead to an inefficient use of land, and do not align with paragraph 124 of the NPPF. Fundamentally, the proposals do not correlate to realistic levels of household car ownership across the county, and are not based on any reliable evidence. The proposed standards are based on assumptions in an attempt to resolve a problem which potentially does not exist, at the cost of taking up valuable land which could be used to deliver much needed housing. This is explained in more detail below.</p> <p>5. Design / Design Options</p> <p>The SPD indicates that in aiming to achieve the parking requirements this needs to be balanced with good design, implying that a variety of parking options may be considered, including both frontage/side parking as well as rear parking and parking courts. However, the parking standard also specifically states residential parking must be allocated “in</p>	<p>Support for counting garages as a parking space noted.</p> <p>Getting the parking provision correct on new developments requires striking a delicate balance between the needs of different stakeholders. On residential developments, the Council must consider the needs of residents who require sufficient secure off-street parking and the needs of residents moving around developments, including those with mobility issues. The Council must also consider the principles of good design that make new housing attractive and viable as well as providing sufficient space which limits harm to residential amenity and provides space for service and delivery vehicles.</p> <p>The SPD has been subject to three rounds of consultation, so the Council has had the opportunity to consider a wide range of views from different stakeholders and the different evidence provided as part of this extensive consultation. Although there was some concern over the level of parking being proposed on new residential estates, there was also concerns over a lack of parking in new estates which could lead to vehicles parking on footpaths and verges causing inconvenience and</p>
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	<p>curtilage on driveway” which suggests developers should primarily locate parking to the front, and parking to the side – Bellway fully agree with this aspect. However, in the reality of most planning applications, schemes are reviewed by the design review panel and the repeated comment is raised that developments should reduce frontage/side parking and favour rear parking and reducing parking density.</p> <p>The concern with setting such high parking standards (with no supporting evidence) is that it becomes at odds with the principle of reducing parking in the street scene, resulting in a conflict of advice and opinions within the authority. The Council’s aspiration for increased parking requirements whilst simultaneously promoting reduced frontage parking are two mutually exclusive goals; both cannot be achieved together. This conflict, as a result, makes the design expectations harder to predict and planning process more frustrating/complex for developers and planning officers, further prolonging the application determination and delaying the delivery of much needed housing.</p> <p>Moreover, the DRP favoured rear parking/ parking court arrangements are considered undesirable and unnecessary for modern day customers/homeowners. Poor examples of rear parking and parking courts are evident across the county and nationally in mid 20th century development, and can result in issues of anti-social behaviour, accidental damage and restricts the view of homeowners being able to see their own cars. In addition, rear parking/parking courts reduces accessibility to homes, which is a significant issue for those with mobility issues. Whilst the benefits of reducing cars in the street scene are recognised from an urban design perspective, there are clearly other needs and considerations which take priority.</p> <p>To summarise on design, Bellway do not agree that there is a problem with the existing levels of car presence in the street scene or with parking space requirements. Bellway further</p>	<p>possible safety issues to other residents.</p> <p>The residential parking guidelines are now broadly like those being used in Northumberland which is often used as a comparative authority to Durham and faces many of the same challenges relating to public transport provision, particularly in rural areas, viability and has similar (although slightly higher) car ownership levels. The Council therefore consider the parking standards in the SPD are reasonable and in step with those of similar authorities.</p> <p>The inclusion of garages as counting towards a parking space responds directly to concerns raised by the house building industry as part of the second public consultation phase. We understand the concerns of the Home Builders Federation around viability; however, our emerging evidence indicates that the new requirements will not have a significant impact on viability of new housing sites. This assumes that the additional parking requirement is unlikely to have a significant impact on the overall housing yield given the scope to absorb this within incidental, left over spaces and private curtilage. Housing delivery in County Durham will however be</p>
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	<p>consider that the increased parking standards will only serve to increase the dominance of car parking in new developments. This dominance can only be addressed through a reduction in development densities, which would not be acceptable; a reduction in development density brings into question whether Durham County Council are enabling developers to make efficient use of land and meet the overall housing requirement for the County. Furthermore, new developments will suffer in quality, as opposed to those that can be built with at present, due to the limiting of opportunities for other sought after amenities such as street trees, open space, and roadside swales, in favour of what may end up being redundant, unnecessary car parking spaces.</p> <p>6. Implication on Site Viability</p> <p>Recently the viability evidence behind the County Durham Plan has undergone review and is being updated. When the Plan was published the deliverability and viability of development across County Durham was based upon historic rates of development densities (in terms of gross to net developable areas).</p> <p>Bellway question whether the Council has considered the implications of the proposed increased parking standards on achievable development densities if car parking is to be balanced against good place making and good design? If the proposed parking standards are to be strictly enforced and design standards favouring car dominance are to be maintained, then it is highly unlikely that the 13 development densities assumed in the County Durham Plan will remain viable.</p> <p>These parking standards will drive lower density developments and contribute to undermining the viability of future development across the County.</p> <p>7. Flexibility on standards for design / viability</p>	<p>monitored closely as part of our Annual Monitoring Report and if this SPD is having an adverse impact, the Council will consider a review of the parking guidelines.</p>
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Bellway welcome the flexibility the SPD provides regarding paragraph 4.3 where it is stated that:

“in certain circumstances which can be evidenced, for example, for reasons of sustainability, design or viability, a deviation from these guidelines may be considered.”

However, Bellway would encourage this point to be developed further, to provide greater clarity regarding the finer details. In particular, we would ask how developers are to know what level of parking will be accepted if parking standards were to raise design and viability issues.

Bellway believe that this flexible approach will be critical in terms of maximising the full potential of sites on a case-by-case basis. Such an approach allows for the nuances of different locations across a County with immense diversity in terms of population density, land value, rurality, and infrastructure to be considered. As a result, developers would be afforded flexibility to maximise the opportunities presented to them by unique locations in the County.

This may include Sites near the city centre, where there are excellent public transport links and huge potential to promote walkability and an active travel lifestyle, it would be a missed opportunity to insist on the same ratio of car parking to dwellings that a potentially far more rural and isolated Site would require.

We would strongly emphasise this point as the Council seeks to encourage healthy lifestyles integrating active travel means as part of any new developments. There is an urban rural difference within the County, and the Council should recognise the discrepancies as part of best managing this.

8. EV charging

Bellway wish to query whether the proposed Electric Vehicle (EV) charging requirement should be removed from the SPD, as this is not a planning matter but rather a matter for

	<p>Building Regulations. Furthermore, the provisions made for EV charging within the SPD go beyond what is required within the Building Regulations. The Building Regulations make provisions for flexibility in the requirement on developers to provide EV charging points if it is not technically possible to do so. This flexibility is something which Bellway would like to see integrated into the SPD should any EV charging requirements be kept, as it is felt a blanket approach is unrealistic, and not considering the real-life challenges developers can face e.g., if the parking space for a dwelling is separate from the curtilage of the building.</p>	
<p>David Friesner</p>	<p>4.10 Driveway Standards. The SPD must make clear that these permeable material standards apply to all driveways, including any alterations, changes and extensions to existing driveways from future building works</p>	<p>These guidelines can only be applied when planning permission is required.</p>
<p>Diane Foster</p>	<p>I understand this is new builds but there should be consideration in some document of parking arrangements in existing housing estates to accommodate EV as we have to access to parking outside or close to our property to allow for EV</p>	<p>These guidelines can only be applied when planning permission is required.</p> <p>In terms of future proofing housing for Electric Vehicles, the Council are involved and delivering a number of projects that seek to increase access to EV chargers, particularly for residents who do not have off-street parking.</p> <p>The Council are delivering two separate projects, one of which seeks to install new EV charging bays in residential areas where there are existing or potential communal parking areas and another which enables residents to locate charging cables in a gully inserted in the pavement outside their homes. For more details, please contact the DCC Low Carbon team.</p>

Yvonne Flynn – Durham University	Section 4. Residential Parking Guidance Noted the City Controlled Parking Zone (CPZ) has been removed and the number of parking spaces in a Purpose-Built Student Accommodation (PBSA).	Comment Noted.
Laura Dodd-Lanchester Parish Council	4.10 Driveway Standards. The SPD must make clear that these permeable material standards apply to all driveways, including any alterations, changes and extensions to existing driveways from future building works	These guidelines can only be applied when planning permission is required.

<p>Sunny Ali-Highways England</p>	<p>Public Transport Accessibility in Residential Locations</p> <p>This section makes reference to how higher density housing should be located close to public transport routes and that the maximum walking distance to the nearest bus stop from any residential property should ideally not be greater than 400m. The SPD notes that in a rural County like Durham, this is an ideal rather than a standard as it is recognised that many rural villages and towns are not served by a frequent bus service. We would query whether the proposed development “would be located in an area of high accessibility by sustainable transport modes” (Circular 01/2022), if a 400m walking distance to a bus stop was not achievable, and therefore whether the location was suitable for development.</p> <p>Our previous comments in relation to non-residential locations are also applicable here. In line with this, we believe it would be beneficial for greater detail to be included on what the Council deem to be acceptable cycling and walking distances for residential developments to key destinations.</p>	<p>Acceptable walking and cycling distances are subjective and to some degree, dependent on an individuals’ fitness levels as well as local topography. The LCWIP process gives us a tool to help shape our new development sites and incorporate better walking and cycling routes into to new developments.</p> <p>In an ideal world, the council would insist that new developments 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. To have four services an hour in a rural County like Durham would be great, but not currently financially viable.</p> <p>It is also a difficult balance for the Council when assessing new development sites in many of our rural communities. As in other communities across the country, many of our communities have lost ‘walkable’ employment opportunities which unfortunately, has entrenched car use in many of our communities. Now, these communities have also lost local shops and services, but it is imperative as a Council that we understand the needs of those communities and allow for investment, employment opportunities and the</p>
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		housing need in these communities.
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<p>Lichfields (on behalf of) Co. Durham Land LLP</p>	<p>Residential Parking Guidance – Parking Standards</p> <p>CDL are pleased to see that the residential parking standards have been updated to allow for appropriately sized garages to contribute to meeting parking requirements. This is a much-welcomed improvement to the previous consultation where minimum sizes were set but they were not recognised as a parking space. Including this flexibility allows for designs to ensure development is not dominated by external parking arrangements in line with the National Design Guide to create well-designed, attractive parking solutions. Notwithstanding this, the benefit of this change has been reduced by the decision to increase the overall requirements for parking.</p> <p>We kindly refer DCC to consider the detailed comments regarding parking standards that have been submitted by the Home Builders Federation (HBF) in response to this consultation. CDL support the concerns raised by the HBF with regards to the parking requirements within residential developments.</p> <p>Public Transport Accessibility in Residential Locations</p> <p>CDL welcome the inclusion of detail within the updated draft SPD to include guidance on public transport accessibility in residential developments. As highlighted in CDL’s response to the 2022 consultation, should this definition of an ‘accessible destination’ be used to control the location of new housing in the County, it is essential 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>We welcome the clarification made within this section of the SPD, that the walking distances to bus stops listed are ‘ideal’ rather than a standard, fixed requirement with regards to residential development. However, we request</p>	<p>Acceptable walking and cycling distances are subjective and to some degree, dependent on an individuals’ fitness levels as well as local topography. The LCWIP process gives us a tool to help shape our new development sites and incorporate better walking and cycling routes into to new developments.</p> <p>In an ideal world, the council would insist that new developments 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. To have four services an hour in a rural County like Durham would be great, but not currently financially viable.</p> <p>It is also a difficult balance for the Council when assessing new development sites in many of our rural communities. As in other communities across the country, many of our communities have lost ‘walkable’ employment opportunities which unfortunately, has entrenched car use in many of our communities. Now, these communities have also lost local shops and services, but it is imperative as a Council that we understand the needs of those communities and allow for investment, employment opportunities and the</p>
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	<p>there is further consideration given to the distances listed and the instances in which these distances may not be achievable. The below sections set out CDL's stance on these matters, reflective of their response to the previous draft of this SPD.</p> <p>What is the 'ideal' distance?</p> <p>We raise significant 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. As highlighted within our submission to the previous iteration of this SPD, it is also recognised that people are willing to walk a longer distance to a well-served bus stop, Chartered Institution of Highways and Transportation (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'.</p> <p>The draft SPD still 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)'.</p> <p>As raised previously, 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</p>	<p>housing need in these communities.</p> <p>The 400m distance you refer to, has been debated for years and it is impossible to say, this is the definitive distance people will walk to a bus stop because of the number of variables set out in your representation. We have chosen 400metres because it widely accepted in the industry, and this is acknowledged by our public transport team. The inclusion of the word ideal gives developers some flexibility to make a case at the application stage.</p>
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	<p>London, the average distance people walk to a bus stop is around 600m, and the 85th percentile walking distance is over 800m.</p> <p>24 We maintain that the stated 'ideal' figure is overly restrictive to the delivery of sustainable development and must be altered to reflect the up to date evidence. On the basis of up to date evidence, the 'ideal' distance should be no less than 600m.</p> <p>Should a strict walking distance to bus stops be required?</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 "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."</p> <p>CDL welcome the inclusion of the wording 'ideally' within the SPD text with regards to these distances, and the acknowledgement that these distances may not be achievable in rural locations within the County. However, greater clarification must be provided with regard to what other factors should be taken into account when assessing when any ideal distances are listed.</p> <p>A large proportion of County Durham is semi-rural, where walking distances are significantly greater than in urban areas. Given the huge variety of settlements within County Durham, it is requested that paragraph 4.23 is updated to ensure flexibility within semi-rural and village locations as well as just rural locations as currently noted in this paragraph.</p> <p>The availability of services within each settlement should also be taken into account in</p>	
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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 within 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.'

It is essential that the 'Public Transport Accessibility in Residential Locations' section of the draft SPD is updated to reflect the variety of instances in which the ideal walking distance may not be achievable, while rightly ensuring that public transport accessibility remains a priority for residential development in the County.

Ensuring accessibility through viable and quality bus services

In line with the above recommendations that other factors are taken into account when considering accessibility, we wish to highlight the importance of ensuring that the bus services which are accessible are meeting the needs of the residents within reach. 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

	<p>encourage people to walk further to access these. To restrict growth in the settlements with already limited bus services could not only result in a failure to deliver the housing required for the County, but would also risk the viability of bus services.</p> <p>Further clarification is requested in relation to the contribution and management measures set out within paragraph 4.25 to ensure viable public transport 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/discounted bus passes. This benefit should not be lost based upon a strict application of an acceptable walking distance to a bus stop.</p>	
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<p>John Lowe (Durham City Trust)</p>	<p>Installation of electric vehicle charging</p> <p>The Trust would like to see greater clarity as to whether the requirements for electric vehicle charging will apply in cases such as planning applications for change of use or for extensions or alterations to existing buildings. Does the Council intend to go beyond the Building Regulations Part S requirements in this regard?</p> <p>Conversion of garages to habitable rooms</p> <p>If garage spaces are to be counted towards the car parking allocation then removing permitted development rights via a condition on granting the planning application for a development would be a useful safeguard. Home owners could apply for permission which could then be considered case by case.</p> <p>Determination of the application should take into account cycle parking where this had been provided via a garage. Paragraph 4.6 should be amended as follows (green text added, red deleted):</p> <p>Therefore, when new housing developments are approved, the council may consider removing permitted development rights on a site-by-site basis to control the future loss of garages, car ports, and other parking spaces and storage for cycles, mobility scooters and motorbikes provided in new development. Planning applications for the conversions of garages determined following the removal of permitted development rights will need to demonstrate that sufficient parking spaces and storage remain.</p> <p>The statement that the council “may consider removing permitted development rights” is weak. The Trust suggests that para. 4.6 should be amended further to state that permitted development rights will be removed wherever (a) a dwelling would not meet the SPD car parking rates if the garage were converted, or (b) within the areas in Durham city where planning permission is required for change of use from C3 to C4, even if the HMO</p>	<p>The guidelines should be used whenever a planning application is being determined against the policies in the County Durham Plan. If there is an application for a change of use or alterations to the existing building and this goes beyond Part S, then the guidelines in the SPD should be considered.</p> <p>The Council do not support the proposed amendments to Para. 4.6 as the condition to removed permitted development rights is not aimed at safeguarding storage space, but rather, it is intended to safeguard parking spaces and to prevent the conversion of garage spaces to living spaces. The safeguarding of garages (over the minimum size stipulated in the SPD) will have the additional benefit of protecting storage spaces which could be used for cycles, mobility scooters and motorbikes. Planning Officers dealing with individual applications, understanding site characteristics and street designs will be best placed to determine when to apply the condition to remove permitted development rights.</p> <p>The Council is satisfied with the way para. 4.4 is currently worded as it states that officer should ‘consider’ the minimum guidelines in Table 5 and</p>
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	<p>percentage is below the threshold. (These areas were either created through Article 4 directions or via removal of permitted development rights.)</p> <p>Application of car parking requirements to residential extensions</p> <p>Para. 4.4 states that the car parking requirements would also be applied where additional bedrooms are created, but the way the paragraph is phrased suggests that this will not always be applied (“additional in curtilage spaces may be required”).</p> <p>The Trust is of the view that there are a number of scenarios in which increasing the number of in-curtilage parking spaces would not be appropriate or desirable:</p> <ul style="list-style-type: none"> • Within a Conservation Area if providing an extra parking space would require removing hedges, walls or other boundary features characteristic of the area. • Within a Controlled Parking Zone, where it is not desirable to create extra parking capacity, and indeed, adding a new driveway can, in effect, privatise the on-street space in front of a dwelling. • In cases where the additional room, although usable as a bedroom, is intended to provide a home office: indeed this may enable the residents to reduce the number of cars they have. • If the provision of car parking would entail the loss of trees or other significant greenery. • Where introducing a new crossing of the footway would endanger pedestrians. <p>The SPD could be enhanced if such scenarios were included as examples to illustrate how the policy would be applied.</p> <p>The information on the Durham City Controlled Parking Zone² states that resident and visitor permits are unavailable for any buildings built or converted after 2000. It would be helpful to refer to this within the Parking and Accessibility SPD.</p> <p>Houses in Multiple Occupation</p>	<p>therefore allows some flexibility in the scenarios that you illustrated. Standards has been replaced with ‘guidelines’ in this para to reinforce the decision makers flexibility.</p> <p>Regarding the comments on HMOs, the Council understands that there may be a lower demand for parking spaces for student occupied HMOs, but note that the opposite could be true, if the HMO was populated with car driving professionals.</p> <p>The Council are happy with its driveways widths after consultation with its highways team.</p> <p>The Council notes your comments on layout of car parking, unallocated car parking and the location of charging points and cable routes, the design of cycle parking and the security of cycle parking. The Council is content with what is already set out in the SPD on these issues.</p> <p>Getting the parking provision correct on new developments requires striking a delicate balance between the needs of different stakeholders. On residential developments, the Council must consider the needs of residents who require sufficient secure off-street parking and the needs of residents moving around developments, including</p>
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	<p>Para. 4.7 states that HMOs will have the same car parking rates applied per bedroom as normal houses “as they were not built as student housing and often house young professionals”. In much of Durham City Article 4 directions or removal of permitted development rights via conditions control the conversion of properties from use class C3 to C4 or the sui generis category of a large HMO . The test for Policy 16(3) rests primarily on the concentration of nearby properties with a Class N Student Exemption to Council Tax.</p> <p>In these Article 4 areas it is therefore inaccurate to say that the HMOs “often house young professionals”. The University discourages car use among students by only issuing parking permits in exceptional cases . If the Council were able to reduce the long-stay on-street parking provision near the University then car use among students living in HMOs could be constrained and it would not be necessary to provide such large quantities of car parking.</p> <p>If these conditions can be achieved, the Trust would favour a greatly reduced car parking requirement for HMOs within the areas where Policy 16(3) applies, and no car parking provision for HMOs within the Durham City CPZ.</p> <p>Driveway dimensions</p> <p>The SPD requires driveways to be a minimum of 2.7m wide or 4.7m for double drives (para. 4.11).</p> <p>The width requirement for driveways rather depends on how far the Council wishes to accommodate the trend to wards larger vehicles which is unfortunately contributing to increased emissions. The Trust observed at the Issues and Options stage of consultation that a width of 2.7m would leave insufficient space for an yone in a wheelchair to move alongside the vehicle, if the vehicle was a large SUV (which could be 2m in width). The Trust also suggested that additional driveway width</p>	<p>those with mobility issues. The Council must also consider the principles of good design that make new housing attractive and viable as well as providing sufficient space which limits harm to residential amenity and provides space for service and delivery vehicles.</p> <p>The SPD has been subject to three rounds of consultation, so the Council has had the opportunity to consider a wide range of views from different stakeholders and the different evidence provided as part of this extensive consultation. Although there was some concern over the level of parking being proposed on new residential estates, there was also concerns over a lack of parking in new estates which could lead to vehicles parking on footpaths and verges causing inconvenience and possible safety issues to other residents.</p> <p>The residential parking guidelines are now broadly like those being used in Northumberland which is often used as a comparative authority to Durham and faces many of the same challenges relating to public transport provision, particularly in rural areas, viability and has similar (although slightly higher) car ownership levels. The Council therefore consider</p>
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	<p>should be required if the drive was alongside a vertical feature such as a wall, as this will also limit access . While the County Council reinstated the minimum drive way width for double drives, the other suggestions were not taken on board.</p> <p>The Northumberland policy requires single drive ways to be a minimum of 3.0m wide (or 5.5m for double drives). An additional 0.3m is to be added in each case if the drive way forms the main pedestrian access or forms part of the bin route to the dwelling. The Council should consider again whether the minimum width stipulated in the SPD is adequate.</p> <p>Layout of car parking</p> <p>As currently drafted, the SPD requires residential allocated car parking to be provided within the curtilage of the property . This very much limits the design options .</p> <p>The draft County Durham Design Code SPD prescribes on-street parking and shared courtyards in some contexts to provide sympathetic design solutions which a void car parking dominating the street. Examples are found in various settlement typologies including the historic towns and cities, historic villages, 19th century industrial towns and new towns.</p> <p>The Building for Life SPD notes in para. 11.2 that “on street parking has the potential to be both space efficient and can also help to create a vibrant street, where neighbours have more opportunity to see and meet other people”, and para. 11.5 recommends “using a wide range of parking solutions appropriate to the context and types of housing”. For terraced houses it suggests “positioning parking within the street scene, for example a central reservation of herringbone parking”. The Parking and Accessibility SPD gives developers the impression that these types of solution are not permitted. In paragraph 4.8 the SPD refers to Manual for Streets p. 106 supporting the use of unallocated parking for visitor spaces. The reference is to paragraph 8.3.21, but the SPD</p>	<p>the parking standards in the SPD are reasonable and in step with those of similar authorities.</p> <p>The inclusion of garages as counting towards a parking space responds directly to concerns raised by the house building industry as part of the second public consultation phase. We understand the concerns of the Home Builders Federation around viability; however, our emerging evidence indicates that the new requirements will not have a significant impact on viability of new housing sites. This assumes that the additional parking requirement is unlikely to have a significant impact on the overall housing yield given the scope to absorb this within incidental, left over spaces and private curtilage. Housing delivery in County Durham will however be monitored closely as part of our Annual Monitoring Report and if this SPD is having an adverse impact, the Council will consider a review of the parking guidelines.</p> <p>The Council notes all your detailed comments and thanks you for the time taken to read and offer suggestions on how the SPD can be improved. While it is not possible to incorporate all your suggestions, we have</p>
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	<p>omits to mention that Manual for Streets also encourages the use of unallocated on-street parking in various circumstances to provide residents' spaces efficiently (p. 104 to 108).</p> <p>Elsewhere in this response the Trust provides evidence in favour of shifting the balance towards unallocated parking and reducing the allocated in-curtilage provision. Whether or not this is accepted by the Council, it is clear that the related Design Code SPD and Building for Life SPD recommend the use of courtyards or on-street parking in some circumstances. Where this happens, de-allocating the parking, so that it is not reserved for the exclusive use of particular dwellings, would allow the overall parking provision to be lowered while still meeting the average car ownership rates.</p> <p>Although para. 4.13 of the Parking and Accessibility SPD refers developers to the other SPDs, the Trust would like to see a clear statement within the SPD that where these documents steer designers towards a communal car parking solution, there may be scope for reducing the rate of car parking provision to reflect the reduction in private spaces that would have gone unused.</p> <p>The Trust would very much support the encouragement of more innovative and varied street layouts which can be much more effective and offer more scope for green infrastructure than the standard volume housebuilder's suburban street layouts with 100% on-plot parking. The Trust has made these suggests in the two previous consultation rounds. Now that the draft Design Code SPD is also supporting this stance, it is hoped the Parking and Accessibility SPD will be amended also.</p> <p>Active Travel England is now a statutory consultee for major planning applications. ATE recently released a planning application assessment toolkit³ which scores proposals against a number of criteria, including "car parking layout":</p>	<p>taken onboard many of the points onboard and welcomed your analysis.</p>
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	<p>The proposed street design should remove opportunities for indiscriminate and obstructive parking that would cause safety hazards and prevent access by active modes of travel either by designing in protected or marked parking bays and accompanying street furniture, planting or other features and restrictions that prevent footway parking, the mounting of kerbs, damage to green infrastructure and blockage of crossing points and sightlines.</p> <p>To score well applications must be able to show that:</p> <p>The site layout, parking management strategy or contribution demonstrably and physically discourage the blockage of footways, crossing points and cycle routes on and off site.</p> <p>The Trust suggests that the Council incorporate into the SPD guidance for on-street car parking which aligns with the above.</p> <p>Paragraph 4.14 of the SPD refers to the proposal (actually already adopted) to change the county's Highways Design Guide to require 5.5m wide carriageways as a minimum throughout residential developments. Pegasus Group, in its response to the 2022 consultation, objected to this change on the grounds that it reduces the ability for developers to introduce a street hierarchy, and cumulatively with the increased parking standards would reduce the rate of delivery of housing. In the Council's response it was stated that the 5.5m width would "accommodate more on street parking".</p> <p>The Parking and Accessibility SPD stipulates the amount of on-street, unallocated car parking that is required. Developers might assume that visitor spaces are to be provided in actual bays, as found in the recent applications for housing at Sniperley and Bent House Lane, but the response from the Council suggests that parking might be expected anywhere on the 5.5m wide estate roads. The Trust provided examples of parking behaviour in its response to the Highways Design Guide consultation⁴ which showed that</p>	
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increasing the width to 5.5m does not, in itself, solve the problem of pavement parking. Delineating the car parking bays using build-outs or paint markings may also be necessary .

There needs to be greater clarity in the SPD about the design standards expected for the onstreet, unallocated car parking. Fuller guidance needs to be incorporated into the SPD or into a further revision of the Highway Design Guide .

Unallocated car parking and electric vehicle charging

One issue regarding unallocated and on-street spaces is how to provide for electric vehicle charging. Building Regulations Part S regards on-street unallocated car parking as “associated car parking” if, at the time the plans are deposited, the land forming the carriage way is under the ownership of the developer of the site . So before the highway is adopted, the associated car parking has to be considered for charge points and/or passive cabling provision. This would require EV charging to be provided at on-street car parking spaces to cater for any dwellings that have no allocated car parking. Cable routes would be required to all parking spaces if the development has, in total, more than ten associated car parking spaces .

A number of examples have been given in a “frequently asked questions” accompanying Part S . Diagram 65 is very helpful in demonstrating that on-street parking on a newly built road intended to be adopted as a highway is considered to be associated parking.

The conclusion is that the need to provide EV charging does not require a high level of unallocated car parking.

Location of charging points and termination of cable routes

The proposed SPD does not contain any guidance on how charging points should be

placed in relation to pedestrian footways . Where possible the on-street parking bays and footways should be designed so that the EV charging does not obstruct or narrow the footways. This should also apply to the termination points of cable routes. The Trust would like to see guidance included to this effect.

In the comments submitted to the consultation on the Highways Design Guide changes in June 2022 the Trust suggested that the minimum footway width be increased from 1.8m to 2m in line with Inclusive mobility6 (DfT, 2021). If the County Council continues to prefer footway widths which do not meet the national guidance, it is even more important to ensure they are not obstructed. The Trust notes that the Active Travel England planning application assessment toolkit7 (June 2023) refers to 2m footway widths in two of its scoring criteria.

Cycle parking: design

Table 5 and supporting paragraphs 4.17 and 4.18 do not anywhere require residential cycle parking provision to be enclosed or covered, unlike the long-stay destination cycle parking. This should be an absolute requirement for residential cycle parking, not just a recommendation.

The Trust would like an additional paragraph inserted after 4.18 to read:

The design of residential cycle parking must have regard to the guidance found in LTN 1/20 paragraph 11.3.2 and sections 11.4 and 11.8.

The only references at present to LTN 1/20 relate to non-residential provision. The sections referenced above cover cycle parking for non-standard cycles, types of stand and positioning, guidance on two-tier stands (which might be considered for apartments) and residential facilities in particular .

Cycle parking: security of storage

The Trust notes that recent major planning applications for housing at Sniperley and Bent House Lane have proposed to provide cycle parking in garden sheds for house types with no garages. A garden shed at the back is less convenient for users, and items stored within may also be more vulnerable to theft, as noted in LTN 1/20 para. 11.8.1 which favours internal storage.

Where a house is provided with a garage, the SPD expects that all cycles can be accommodated within the garage, and that the space will also be available for a car to meet the car parking requirements. This seems unrealistic: for a four bedroomed house LTN 1/20 would expect 4 cycle parking spaces. Fitting four bicycles conveniently into a 3m by 6m garage along with a large modern car would be challenging. Manual for Streets in para. 8.3.41 suggests that 3m by 6m garages can be used for car parking as well as storage, but it dates from 2007 before the trend towards significantly larger vehicles had become apparent.

The Trust would like to see encouragement of house types which include some general purpose storage accessible at the front or side of the house, within its footprint, and akin to a garage in terms of its interior. This would be of use for storing cycles and mobility equipment, lawnmowers, garden furniture, tools, etc.

This approach acknowledges that few people keep cars in garages, but that garages are still popular with purchasers of larger properties because of the storage opportunities.

Appendix: efficacy of residential car parking model

In the Trust's submission to the 2022 consultation we provided a detailed analysis of 2011 census data which demonstrated that the Council's proposed model for residential parking would result in considerable waste of land through providing parking spaces that would be unused. This would be contrary to NPPF para. 119 which requires planning

policies to “promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment”.

This analysis has been brought up to date using 2021 census data using an enhanced methodology which accurately matches the number of bedrooms to the number of cars

Car ownership levels

Indications from the National Travel Survey suggested that there had been little growth in car ownership in north-east England since the 2011 census. The survey includes annual time series⁸ for the number of cars/vans per household, and the percentage of households with no car, one car, and two or more cars. The publication warned that the figures for 2020 are very unreliable because of the small sample size and the effects of the pandemic.

The 2021 census figures reveal that there has been some growth in car ownership. The number of households with no car has decreased to 24%. The average number of cars per household has increased further, suggesting that there are more households now with three or more cars.

Via the ONS website it is possible to query the census results create a cross-tabulation of one census statistic with another. We can thus discover how many 2 bedroom houses, say, have access to a single car, how many have no car, and the same for any other combination of these categories. The following table shows the total number of households in County Durham broken down by the number of bedrooms, and for each category shows the proportion of these dwellings with access to no car, 1, 2, 3, 4 or more cars.

We can compare this with the Council's proposed model for in-curtilage car parking provision. The Council propose that all 1 bedroom dwellings should have a minimum of 1 allocated car parking space. If this had been applied across the current housing stock and

current car ownership in the County almost two thirds of these spaces would be unused, because 63% of one-bedroom households have no car.

The Council propose 2 spaces per dwelling for 2-bedroom houses, yet 84% of 2-bedroom households have fewer than two vehicles, and 35% of 2-bedroom houses would have two spaces unused. Only 17% of 2-bedroom houses would make full use of the allocation.

Across all households in the county, only a third have more than one car.

Of course, the number of bedrooms is not the only, or even perhaps the main determiner of the number of cars owned by a household. In accessible areas with good public transport and active travel routes, the availability of car parking spaces can affect the car ownership rates. Over-provision of car parking is one of the factors that can cause car ownership to rise.

The following table indicates the percentage of households of different types where all the allocated parking spaces would be used, if the proposed allocation model in the SPD were applied to current housing stock in the county. It also shows the percentage of spaces which could be unused. We have had to estimate the 5 and 6+ bedroom figures because the census lumps these two categories together.

This is a remarkable level of over-provision. When considered across the whole of the county, with 234,773 households at the 2021 census, the Council's proposed allocation formula would result in 494,756 in-curtilage car parking spaces of which 230,296 (or 47%) would be unused. That is a rate of nearly one car parking space per household. With minimum dimensions of 5.5m by 2.7m this equates to 342 hectares: enough space for about 10,000 houses at 30 dwellings per hectare

Obviously, the SPD would not immediately affect existing levels of car parking provision,

but it is imperative to consider whether such a large uplift in provision, by comparison with existing housing, is necessary or desirable .

Paragraph 108 of the National Planning Policy Framework allows maximum parking standards to be set for residential accommodation only where “there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport”. By setting minimum rates across the county which clearly exceed what is needed, the Council is not conforming with Section 11 of the NPPF “Making effective use of land”.

The Trust acknowledges that the Council has avoided setting maximum parking standards, but there is no policy imperative to set minimum rates in a way which leads to land being wasted to this extent.

Even on a policy principle of “predict and provide” the car parking allocations substantially exceed what is necessary . Yet various council and national policies seek to reduce car use, including the Local Transport Plan 3, the Durham City Sustainable Transport Delivery Plan and the Climate Emergency Response Plan 2. The Council should have a starting assumption that new housing developments will, through travel plans, public transport accessibility, and walking and cycling links, begin to deliver on these strategic policy objectives.

Excessive car parking allocations conflict with other aspects of planning policy .

- Policy 21 requires development to provide “appropriate, well designed, permeable and direct routes for walking, cycling and bus access”. Having to find room for car parking and for active travel routes will reduce density and make developments less viable .

- The Building for Life SPD asks that residential car parking be well integrated so that it “does not dominate the street”. The

Parking and Accessibility SPD discourages overreliance on tandem parking (para. 4.12). Two-bedroomed properties rarely have garages, and even a 4-bedroomed house with garage would need to provide two further spaces. With the car parking required to be in-curtilage, it would be hard to avoid tandem parking without having a street frontage dominated by driveways for car parking.

Designing a county-wide model

The Trust has performed an analysis of the 2021 census data with the object of reducing the wastage of land. The analysis software takes a parameter defining the limit on unused in-curtilage spaces that will be tolerated. For each house type (e.g. 1 bedroom, 2 bedrooms, etc.) it then works through the following process:

1. Set the in-curtilage allocation for the house type to zero initially
2. Calculate how many car parking spaces will be unused with this allocation model across the county
3. Calculate how many cars will need accommodating in communal parking
4. Calculate the unused in-curtilage spaces as a percentage of the total in-curtilage spaces for that house type
5. If the percentage of unused spaces is below the defined limit, increase the in-curtilage allocation by one and repeat steps 2 to 5.
6. Once the limit has been breached, reduce the allocation again to bring it within the defined limit.
7. Finally the process outputs the recommended allocation model, including the rate at which unallocated car parking spaces will need to be provided to accommodate any cars which exceed the in-curtilage provision.

Because of the limits of the census data, unlike the latest version of the SPD the allocation model does not set a requirement for houses with six or more bedrooms. Instead the top category is five or more bedrooms. However, the analysis of over-provision in the table above suggests that having a separate category for 6+ bedrooms is unnecessary and leads to substantial wastage .

By adjusting the tolerance setting, it is possible to run this process for a number of different wastage scenarios . The following table shows a couple of outcomes, with the Council's proposed model set alongside for comparison.

The non-allocated spaces, to be provided on-street or in communal parking areas, are expressed as a decimal, so 0.25 equates to 1 space per four dwellings.

The column headings are:

A = allocated in-curtilage spaces per dwelling
U = unallocated spaces required per dwelling
W = estimated wastage rate (unused spaces as percentage of allocated spaces)

In the Trust's response to the 2022 consultation on the Parking and Accessibility SPD we proposed a different model, which allocated fewer spaces to 2-bedroomed houses and more spaces to 5-bedroomed houses. In that analysis we had assumed that the households owning more cars all lived in the bigger houses. The cross-tabulation available in the 2021 census data extract allows the variation in car ownership to be accommodated very accurately.

Note that the unallocated provision, as presented above, does not make allowance for visitor spaces in the way that the SPD does. Manual for Streets (para. 8.3.22) cites research finding that “no additional provision needs to be made for visitor parking when a significant proportion of the total parking stock for an area is unallocated”.

If we have low levels of unused in-curtilage spaces, the unallocated proportion will tend to be higher. In the “up to 20% unused” scenario, it is unlikely any additional visitor parking would be needed, unless the development was mainly 4-bedroomed houses. In the “up to 40% unused” there is a lower proportion of unallocated parking stock, but it will depend on the mix of house types. If they were mainly 2, 4 or 5 bedroomed properties then additional visitor spaces would probably be needed, but perhaps at a rate of 1 in 10 dwellings rather than 1 in 4.

Allowing flexibility in design

It is also possible to calculate, for any set allocation of in-curtilage spaces, the number of unallocated spaces which would be necessary to accommodate the expected cars. The next table shows these ratios, along with the expected wastage of unused in-curtilage spaces.

U = number of unallocated spaces to provide per house

W = estimated rate of unused spaces as a percentage of allocated spaces

Using this sort of model, the Council could allow developers more flexibility in design. A developer might choose to build some houses with no allocated spaces, some with 1 and some with 2. The table would allow the number of unallocated spaces to be calculated.

The following worked example could be appropriate for a higher density development with more shared, unallocated spaces:

Middle Super Output Area census data

County Durham is divided into 65 Middle Super Output Areas (MSOAs). By accessing the same statistics at MSOA level it is possible to study the variation in car parking demand from one area to another. For example, MSOA E02004314 covers Claypath, Elvet and much

of the Durham University campus. Processing the census data gives these figures:

The same, broken down by the number of bedrooms with the car number categories expressed as percentages of the total number of households of each type:

Thus 73% of those occupying one-bedroom dwellings have no access to a car, whereas for dwellings of 5 or more bedrooms the figure is only 34%. For all dwelling types in this census area, 44% of households have no access to a car. These figures are all higher than the countywide proportion of 24%.

Taking another Durham City census area which is less dominated by student housing, E02004313 covers Gilesgate, Gilesgate Moor and Sherburn Road: roughly the area between the Gilesgate roundabout and the A1(M).

Compared with the Elvet and Claypath area, the make-up of the housing stock is less evenly split among the different categories, with a much higher proportion of 3-bedroom properties. But within each category the numbers of cars/vans follows a very similar pattern of distribution in both areas. This supports the argument that the accessibility of a site has a strong bearing on the demand for motor vehicles.

By contrast E02004310 encompasses Witton Gilbert, Bearpark and parts of Ushaw Moor. The census figures are as follows:

This census area has a breakdown of housing-stock which is very similar to the Gilesgate area, but the car ownership is clearly higher.

39 Whereas in the Durham City areas about a third of households with five or more bedrooms had no car, in the Witton Gilbert / Ushaw Moor area all households with five or more bedrooms have at least one car, and 13% have four or more.

Variation in cars per household

The average number of vehicles per household varies across the county, with the main causal factors likely to be the accessibility and affluence of the area. This map shows the 65 MSOAs colour coded. Green indicates less than 1.15 cars or vans per household. Yellow is between 1.15 and 1.3. Red is more than 1.3 and can go as high as 1.53.

Applying cars per household to the allocation model

The Parking and Accessibility SPD proposes a uniform rate of car parking provision across the whole county, differentiated only by the number of bedrooms in a dwelling. The evidence above demonstrates that the proposed rates are very wasteful of land.

Paragraph 107 of the NPPF states that when setting local parking standards, policies should take account of various factors, one of which is local car ownership levels. This does not feature in the proposed SPD.

In the following sections we develop a more nuanced set of requirements, which take local car ownership levels into account.

Can we justify varying the requirements based on a simple variable such as the average cars per household? The following chart plots the cars per household for each MSOA in County Durham against the percentage of in-curtilage spaces that would be unused if the SPD's residential car parking rates were applied to the same area.

There is clearly a very strong correlation between the cars per household and the percentage of in-curtilage spaces which would not be used in a particular area. Therefore it makes sense to use the cars per household statistic to help determine what level of car parking provision would be appropriate.

A three-tier model of car parking provision

The following tables propose a system of allocation where it is predicted that fewer than

30% of the in-curtilage spaces would be unused. This is substantially better than the rates proposed in the SPD, and is also more effective than the county-wide model proposed above .

The Middle Super Output Areas of the census are grouped into three bands, roughly equal in number, according to the average number of cars per household.

The middle band (yellow) and the lower band (green) both have an in-curtilage allocation identical to the county-wide model with a 30% wastage limit. The difference is in the rates required for unallocated (e.g. on-street) parking spaces, which are lower for the lower band.

Note also, though, that areas in the lower band would suffer a greater proportion of unused in-curtilage spaces . This suggests that a mixture of provision for 4-bed and 5-bed houses might be appropriate, with some only having 1 in-curtilage space .

Again, we can produce a requirements table which allows developers greater flexibility, balancing a reduction in in-curtilage provision with a corresponding increase in communal parking spaces . Note that the correspondence is not one-to-one, because unallocated parking is more efficient, as noted in Manual for Streets para. 8.3.11.

For example, in the higher band, a developer could provide a 4-bed house with 2 in-curtilage spaces, together with unallocated (e.g. on-street) spaces at a rate of 0.29 per house . If the in-curtilage provision is dropped to a single space, the unallocated rate only rises by 0.68 per house because of the reduction in wastage from unused in-curtilage spaces.

If used to set the parking standards, the policy could require that if a developer selects a rate of provision where the wastage would exceed 50% (the red cells), this would only be permitted in exceptional circumstances, and that any wastage above 30% would require justification.

Design and layout of car parking would need to conform with the Building for Life SPD and the County Durham Design Code SPD. The additional flexibility offered by the above approach would, however, make it easier to conform with these related planning documents.

Other possible factors

40 As well as local car ownership, NPPF para. 107 states that parking policies should take into account the accessibility of the development and the availability of and opportunities for public transport.

The Department for Transport sponsor the Propensity to Cycle Tool which models the cycling rates expected under different scenarios. It is based on the 2011 census travel to work data, using a sophisticated model which takes into account topography including hills. The most ambitious scenario is represented by Dutch-style high-quality cycle infrastructure (of the sort now mandated by Active Travel England and LTN 1/20) combined with wide up-take of e-bikes, enabling longer and hillier journeys.

The tool predicts cycling rates, and the diminution of car commuting, at the Lower or Middle Super Output Area level.

It would be possible to use these predicted rates as a measure of the potential accessibility on each MSOA. The following map illustrates the results.

Green = predicted cycle share of 23% or over

Yellow = predicted cycle share of 16% to 22%

Red = predicted cycle share of less than 16%

Even the lowest predicted share exceeds 10%, much higher than the 1% to 2% average across the county at present.

	<p>In any case, magnitude of the predicted share matters less than the ranking of the areas, as that helps to indicate the more accessible areas where there is more potential for people to reduce their car use.</p> <p>Some of the areas which are predicted to be more accessible by cycling are areas with higher car ownership, while some of the least accessible areas have low car ownership (either because they are less affluent, or in the case of the Elvet area of Durham, because of a high student population and strong parking controls). The following map shows the MSOAs which differ in this way. Those shaded blue have low car ownership and low accessibility, and those shaded grey have higher car ownership but also would be very accessible by cycle.</p> <p>In these areas the assignment of car parking rates based on the current rate of car ownership per household may need to be adjusted. The blue areas may genuinely require a higher rate of car parking provision. In the grey-shaded areas better active travel and public transport opportunities could be prioritised in order to reduce the car parking demand.</p>	
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No. of comments – 11

Question 11

Do you support the approach to setting guidance for parking and accessibility as set out in the SPD? Please give reasons for your answers

Respondent	Comment	DCC Response
Sharon Jenkins-Natural England	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment	Comment Noted.

<p>Lichfields (on behalf of) Taylor Wimpey</p>	<p>Representation to Durham County Council Parking and Accessibility Supplementary Planning Document Consultation – Taylor Wimpey.</p> <p>Thank you for the opportunity to provide representations to the consultation on the latest draft of the Parking and Accessibility Supplementary Planning Document (SPD) undertaken by Durham County Council (DCC).</p> <p>This response sets out comments on behalf of Taylor Wimpey (TW) in response to the latest draft of the aforementioned SPD. This covers several topics as follows:</p> <ul style="list-style-type: none"> • Implementation of the SPD • Non-Residential Parking Accessibility • Residential Parking Standards • Residential Parking Accessibility <p>Implementation of SPD</p> <p>TW welcomes the clarification which has been made since the previous iteration of the SPD which confirms that the SPD is ‘guidance’ throughout the document. However, TW request further clarification on how this guidance will be applied in the determination of planning applications. Assurance is required through the wording of the document of how the SPD will be weighed against various other material considerations in decision making. We raise concerns that, given the specific and quantitative nature of much of the content of the SPD, that little flexibility may be given on these matters despite the label of the document as ‘guidance’.</p> <p>We request that further clarity is provided within the adopted document to set out that the requirements of the SPD will not be applied to applications for Reserved Matters or the Discharge of Conditions where outline planning permission (and therefore the number of units on a site and viability) has been established based upon current standards. To implement any additional standards at this stage could increase</p>	<p>The Council thanks you for your comments and notes your concerns.</p>
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the land-take associated with highways and car parking with potential knockon effects on housing delivery and viability.

Conclusions and recommendations

Taylor Wimpey conclude that the SPD cannot be adopted before the following recommendations have been actioned. To adopt without making these changes would have the effect of restricting the delivery of sustainable, and 'add unnecessarily to the financial burdens on development', contrary to published Planning Practice Guidance (Paragraph: 008 Reference ID: 61-008-20190315). With regard to an appropriate distance to a bus-stop this includes:

- Up-to-date evidence of how far people are willing to walk to a bus-stop;
- The delivery of efficient bus services (including through consultation with the relevant bus operator)
- The form of the settlement and the ability to deliver the necessary number of new homes within the ideal distance of an efficient bus service;
- The availability of other services within a settlement; and
- The quality of the walking route.

TW would like to take the opportunity to thank the Council for the opportunity to comment on the draft SPD. We trust that the comments will be given due consideration before the document is finalised and adopted. Please get in touch should there be any queries at all regarding these comments.

<p>Mr A Shanley – City of Durham Parish Council</p>	<p>Thank you for consulting the City of Durham Parish Council on the latest draft of this important Supplementary Planning Document (SPD).</p> <p>Whilst the Parish Council commends much of the content of this SPD, this entire document fails at the first hurdle insofar as the County Council now appears to regard this document as simply guidance as opposed to clear standards which must set out clear criteria by which new development proposals in our county will be judged. Setting this document as guidance only sends the wrong message to developers, will lead to inconsistencies, and will ultimately undermine the fundamental aims of this SPD if this cannot be rigorously enforced.</p> <p>The Parish Council wishes to make the following further observations on this SPD.</p> <p>Maximum parking standards</p> <p>Firstly, maximum parking standards were indeed raised as an issue at the Examination in Public of the now adopted County Durham Plan, with the Inspector querying why maximum standards had not been proposed in the Council’s current parking standards.</p> <p>Whilst the draft PASPD suggests 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 County Council has attempted to define what may be considered an ‘accessible location’ but also states that this should be viewed as guidance only and a degree of flexibility may be applied. The Parish Council has concerns that taking a case-by-case approach could result in inconsistencies.</p> <p>Thank you for the opportunity to respond to this latest version of the PASPD. We trust that our comments will be taken into account in your assessment.</p>	<p>The Council thanks you for your comments and notes your concerns.</p>
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<p>Joanne Harding - Home Builders Federation</p>	<p>1. Thank you for consulting with the Home Builders Federation (HBF) on the Parking and Accessibility Supplementary Planning Document (SPD)</p> <p>2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.</p> <p>3. The HBF welcomes the opportunity to comment upon the Draft Parking and Accessibility SPD. Our members are substantial investors within the region and key stakeholders / delivery partners and would seek to assist the Council in delivering the County Durham Plan objectives. The HBF welcomes the amendments to the SPD since the previous round of consultation, in particular the counting of the appropriate sized garage as a parking space, however, we still have a number of concerns and objections to the proposed standards as we see their provisions as excessive with the potential to fundamentally undermine the delivery of adequate housing to meet the Housing Need, and question the evidence base which informs them.</p> <p>4. Our members are important developers in the County, and as such the HBF have several objections to the draft Parking Standards SPD, which some of our members have raised previously, this response will go through them individually.</p> <p>Lack of Evidence Base</p> <p>5. The key concern the HBF has is that the evidence base for the parking requirement of the proposed SPD is considerably lacking and is moving into a situation where we make it far easier to enrich car dependency, taking people away from more sustainable modes of transport. The HBF notes that this does not just relate to the parking for residential developments, but</p>	<p>Getting the parking provision correct on new developments requires striking a delicate balance between the needs of different stakeholders.</p> <p>On residential developments, the Council must consider the needs of residents who require sufficient secure off-street parking and the needs of residents moving around developments, including those with mobility issues.</p> <p>The Council must also consider the principles of good design that make new housing attractive and viable as well as providing sufficient space which limits harm to residential amenity and provides space for service and delivery vehicles.</p> <p>The SPD has been subject to three rounds of consultation, so the Council has had the opportunity to consider a wide range of views from different stakeholders and the different evidence provided as part of this extensive consultation. Although there was some concern over the level of parking being proposed on new residential estates, there was also concerns over a lack of parking in new estates which could lead</p>
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	<p>non-residential as well. If parking is an easy option for people in their day-to-day workplace, shopping trips or otherwise, then they will far more likely chose this convenience over public transport, and the household is more likely to own and run multiple cars. Take this convenience out of the scenario, through limited town centre or office parking, improving public transport, walking and cycling become suitable natural alternatives, which may override the need or desire to economically justify a multiple car household. It all gravitates back to our daily lives and the design of our living environments.</p> <p>6. Turning back to Residential parking standards, the HBF objects to table 5 of the Residential Parking Guidance. It is frustrating to hear that part of the reason for the level of parking provision is due to following the parking provision set by Councils elsewhere. As our members have set out in their representations, the NPPF specifically requires, when setting local parking standards, to take into account, amongst other things, local car ownership levels. It simply cannot be the case for standards to be set due to an acceptance of parking standards elsewhere, that is not what national policy tells us to do. If this is the primary basis for the standard, then it is fundamentally flawed.</p> <p>7. The HBF finds it concerning that the Council advised during the SPD presentation, that the Council had undertaken their own surveys to act as evidence to justify the parking standards, adding that the Council would need to speak to the Legal department to understand whether this evidence base could be shared with the industry. It is totally unacceptable to seek to adopt revised parking standards without making the evidence base and approach used available such that the justification and robustness of the evidence can be critiqued.</p> <p>8. Without the Council providing their evidence the HBF is left utilising other publicly available census data on car ownership levels to sense check the proposed parking standards which, as detailed further below, suggest that proposed parking standards are in no way reflective of "Local car ownership levels".</p>	<p>to vehicles parking on footpaths and verges causing inconvenience and possible safety issues to other residents.</p> <p>The residential parking guidelines are now broadly like those being used in Northumberland which is often used as a comparative authority to Durham and faces many of the same challenges relating to public transport provision, particularly in rural areas, viability and has similar (although slightly higher) car ownership levels. The Council therefore consider the parking standards in the SPD are reasonable and in step with those of similar authorities.</p> <p>The inclusion of garages as counting towards a parking space responds directly to concerns raised by the house building industry as part of the second public consultation phase. We understand the concerns of the Home Builders Federation around viability; however, our emerging evidence indicates that the new requirements will not have a significant impact on viability of new housing sites. This assumes that the additional parking requirement is unlikely to have a significant impact on the overall housing</p>
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	<p>9. The car ownership levels for Durham are easily available in the 2021 Census and what they show is the following: refer to attachment 10.</p> <p>What the information from the 2021 Census search shows is that despite the majority of residents of Durham owning 2- and 3-bedroom properties two thirds own 1 car or less, with only a quarter owning more than 1 car. Therefore, to simply attach the parking standards to bedroom rates in our view seems to be misguided, it is almost assuming that everyone who can live in a property can drive and will own a car, which is not what the census data shows. The census data should therefore form the basis of a much more accurate and reflective parking standards SPD than the one currently being brought forward.</p> <p>Garages contributing to the Parking Requirements.</p> <p>11. As we have stated earlier, the members of the HBF are grateful that their comments were taken into consideration and the garages of an appropriate size (6m x 3m minimum) now contribute to the parking requirements. The flexibility this adds to the design of the development and the street scene balanced with landscaping is completely logical. However, the benefit is somewhat washed over given that the overall parking requirements have risen since the last iteration of the document for consultation. Furthermore, the spaces required in particular for the 2-bedroom properties, which wouldn't normally come with a garage, sees a vast increase in parking within the public realm of a development.</p> <p>12. Persimmon Homes demonstrated through their previous representations that the previous SPD had itself already greatly increased parking requirements. This was demonstrated through their Aykley Heads layout for 48 dwellings. In May 2022 when approved it delivered 64 in curtilage parking spaces (around 1.3 dedicated spaces per dwelling). However, the previous SPD would have seen an additional 25 spaces</p>	<p>yield given the scope to absorb this within incidental, left over spaces and private curtilage.</p> <p>Housing delivery in County Durham will however be monitored closely as part of our Annual Monitoring Report and if this SPD is having an adverse impact, the Council will consider a review of the parking guidelines.</p>
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required on the same approval to a total of 89 parking spaces (around 1.8 dedicated spaces per dwelling).

13. The table below has now updated this representation of the parking spaces required as a result of the updated parking requirements within this SPD, and although garages are counted as a space now, the overall parking spaces required for this development would have increased by 48 parking spaces to 112. This is a parking provision of 2.3 spaces per dwelling, nearly double what was required just 2 years ago. The table demonstrates the effect counting the garages has on the layout in the “outside parking” column. This is effectively the spaces required by plots when their garage is taken into consideration or they do not have a garage. What it shows is that the Aykley Heads development would still have to provide nearly the exact same number of “outside” parking spaces to the previous version of the SPD last year, even though the garages are now counted.

refer to attachment

14. The extract below is taken from Persimmon Homes’ previous representation and shows the impact the revised parking standards would have in terms of the street scene (the number refers to the bedroom no. of the plot), particularly the smaller 2 and 3 bed properties add significantly more parking into a development and completely dominate the street scene with tarmac. refer to attachment Design / Design Panel Review

15. A well-balanced street scene is crucial in creating ‘good design’; it assists in creating character, enhancing kerb appeal of properties, assists in sustainable development and crime prevention, enables pedestrian friendly neighbourhoods, street hierarchies, etc. Through the Design Review Panel, Durham County Council are appropriately keen on the promotion of good design in the developments coming forward. One of the difficult balancing acts in all residential developments is the conflict between ensuring an attractive landscape design coupled with parking requirements, and drainage layers of filtration such as roadside swales, which is

particularly pertinent when creating areas of differing character, street hierarchy, pinch points and open space. Coupled with visitor parking of an even spread around the development and producing an attractive and acceptable scheme can take some time.

16. Understandably, our members are concerned that such a significant increase in parking requirements will make this balancing act knowingly more difficult to achieve. Moreover, as expressed in the SPD parking must be provided within the curtilage of the property. This greatly limits the parking design arrangements for properties and in essence leaves two solutions, either parked to the front or down the side of properties. This could cause knock on limitations to how corners in a development are addressed, or the use of parking courtyards which can create high quality design on primary routes through major schemes. It will essentially result in highways guidance dictating place creation and new housing offer in the city.

17. The Design Panel Review is now a well-established process in the determination of any proposed development within the County, and although many of our members consider it to be a positive, its flaws are well documented and in particular the communication between the panel and the applicant is something our members are very keen to improve upon. One of the major re-occurring comments from the panel is the dominance of parking in the street-scene. This substantial increase in parking requirements, which does not reflect car ownership in the County will lead to multiple issues:

- Increased dominance of tarmac and parking spaces in the street-scene;
- Smaller front garden space, with fewer street trees and roadside s wales;
- Increase in drainage requirements; and
- Low density developments with homogenous street scenes of larger detached dwellings all with garages and a lack of smaller family products available.

18. This last point runs contrary to requirement of the Strategic Housing Market Assessment

(SHMA) of the County which states in paragraph 3.116:

Figure 40 shows a significant need for family sized housing to be provided as part of any market housing mix. The high need for smaller housing units is driven by demographic change which is creating smaller household sizes .

refer to attachment

19. The overall result is that the parking requirements will in essence dictate the housing mix, with larger properties with garages creating the only possible design solution, as when affordable requirements and housing options for older people (predominantly 2 bedroom bungalows) are taken into consideration, it will become very difficult to plot them as well as smaller family open market properties without the street scene becoming overly dominated with parking, as demonstrated by the Aykley Heads insert above .

20. This is likely to lead to a far less efficient use of land with more developments potentially becoming unviable, leading to fewer new dwellings in the County providing Section 106 contributions, affordable housing, Council Tax payments, employment opportunities, and ultimately not delivering the housing needed by Durham County Council.

Implications On Viability

21. Durham County Council are well aware of our members' concerns in regards to viability across the County . The HBF and our members have expressed this continually in representations to the County Durham Plan and SPD's thereafter . It is one of the biggest limitations to development going forward and we have expressed concerns over deliverability, particularly in the medium and lower value areas, which we have demonstrated are stalling.

22. Although this has been touched on briefly above, it is important to fully understand the implications on viability this unfettered sweeping change could have if adopted by Durham

County Council. The Local Plan viability update is currently under review. At plan stage the deliverability / viability of development across the region was based upon historic rates of development densities:

- 5-20 dwelling developments – 30dph;
- 50-80 dwelling developments – 32.5dph; and
- 125+ dwelling developments – 35dph.

23. As well as a lack of evidence to justify the need for this additional parking, there is also a lack of evidence to suggest that the above densities can still be achieved as a result of it. There is no design guidance which supports it, or any evidence to say the design panel have been consulted or provided input in it at all. If they are introduced it is highly unlikely that the above densities can be achieved, low density developments would result in further reduced revenue generating elements of a scheme and, fewer affordable homes being delivered, which would not benefit the developer or the Council and further undermine viability and deliverability, all to satisfy a car parking requirement which we don't know is actually required.

24. If this SPD does come forward, then the densities will have to be reviewed in the viability work being undertaken by Durham County Council.

25. The benefits of car ownership are multifaceted including point to point travel, no waiting times, easier to transport shopping and other cargos, etc. The challenge to reverse this reliance of private vehicular transport is therefore increasingly more challenging and the solutions themselves must also be multifaceted, for example, walkable bus stops with regular services, cycle parking and storage, incentivised public transport initiatives, pedestrian connectivity.

26. New developments are required to provide these incentives through their Travel Plan to encourage new residents on to more sustainable modes of transport, which are monitored and reviewed regularly. Therefore, the holistic nature and impacts of parking provision on a new development, whether it be residential or

otherwise, need to be considered from the outset. It will become significantly more difficult for the developer to achieve the targets set in reducing reliance on the private vehicle and more costly in providing initiatives to combat this. On larger schemes these incentives will add up, but all this is utterly superficial if it is simply more convenient to drive and park our motor vehicle.

27. The members of the HBF acknowledge the importance for convenient sufficient parking within our developments, when done correctly they add value to properties and are a major consideration for purchasers. But the standards set here are taking the requirement way beyond the need of residents and will only serve to encourage further car ownership. Flexibility on standards

28. Paragraph 4.3 is welcomed, which states: In certain circumstances which can be evidenced, for example, for reasons of sustainability, design or viability, a deviation from these guidelines may be considered. This flexibility will certainly be required. However, there is nothing in the document which states where these locations would be and what the requirements would be reduced to. As investors in the area, developers require assurances when making decisions about potentially viable developments. There is no guidance to fall back on to give weight to reductions in parking in the determination process and therefore there would be no assurances that the application could proceed to determination based on a possible reduction. This will therefore create uncertainty and ultimately friction in the determination process, which these standards are ultimately created to remove, therefore it is necessary to get the standards set appropriately from the outset.

29. The HBF is of the view that if reduced parking standards are to be permissible within “sustainable locations” then the SPD should clearly detail what would be defined or classified as a “sustainable location” and should detail what the reduced parking standard will be.

EV Charging - see Q2 above Summary

31. As demonstrated above, our members are minded that this SPD reflects a position which has not been evidenced or thoroughly considered in terms of the knock on implications to deliverability in the wider County. It is a position based on perception rather than information. Therefore, the HBF recommends that the Council:

- Provide appropriate evidence to support the requirement of almost double the parking provision that would have been required only 2 years ago by a new residential development
- Justify why the parking requirements being brought forward in this document are significantly higher than car ownership statistics of the County, as demonstrated by the latest Census data.
- Look again at the design implications of this policy to ensure that new developments are not car dominated.
- Consider flexibility in parking arrangements, such as parking courts and corner turning capabilities to prevent layout design limitations.
- Consider the implications of this policy in terms of car dependency and how it may make it more difficult to entice people onto sustainable modes of transport.
- Consider implications of highway requirements dictating place creation and new housing offer, reducing the provision of starter product, affordable homes, first time buyers and young people.
- Reflect on the implications in terms of viability of the creation of homogenous low density developments to satisfy street scene designs with street trees, visitor parking, roadside swales and landscaping to satisfy the Design Review Panel, particularly outside of the higher viability areas.

32. The implications this SPD in its current form has on design and deliverability will not benefit developers or Durham County Council alike and we cannot understand the reasoning for this. Members of the HBF would welcome further discussions with Durham County Council to come to a positive position on this SPD which could work for all parties involved.

Future Engagement

	<p>33. I trust that the Council will find these comments useful as it continues to progress this SPD. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.</p> <p>34. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence</p>	
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<p>Bellway Homes</p>	<p>I am instructed by Bellway Homes (Durham Division) to submit comments to the draft Parking and Accessibility SPD which are currently subject to consultation until 7 July 2023.</p> <p>1. Background</p> <p>The County Durham Plan was adopted in October 2020 when it replaced the saved policies of the former District local plans. It is understood that the draft Supplementary Planning Document is to support the development plan in providing greater clarity on how adopted policies will be implemented in the determination of planning applications. Policy 21: Delivering Sustainable Transport is the overarching policy against which this SPD applies and specially acknowledges the preparation of a future SPD. It also states that the principles in Policy 21 will be reflected including:</p> <ul style="list-style-type: none"> • The need for cycle parking or secure cycle storage; • Sufficient car parking to minimise any potential harm to amenity from footway parking. Avoiding footway parking where it would have an unacceptable impact on highway safety or a sever impact on the road network; • Car parking at destinations should be limited to encourage the use of sustainable modes of transport; and • Appropriate provision for electric vehicle charging. <p>2. Evidence for Parking Requirement</p> <p>Paragraph 107 of the National Planning Policy Framework (NPPF) outlines that if a local authority chooses to set local parking standards for residential and non-residential development then councils should take into account local car ownership levels (amongst other things). Bellway would like to query the robustness of the Council's evidence of car ownership levels as the SPD is silent on this matter. Upon review of the council's evidence base, this does not appear to be included, so greater clarity on how this is</p>	<p>Getting the parking provision correct on new developments requires striking a delicate balance between the needs of different stakeholders.</p> <p>On residential developments, the Council must consider the needs of residents who require sufficient secure off-street parking and the needs of residents moving around developments, including those with mobility issues. The Council must also consider the principles of good design that make new housing attractive and viable as well as providing sufficient space which limits harm to residential amenity and provides space for service and delivery vehicles.</p> <p>The SPD has been subject to three rounds of consultation, so the Council has had the opportunity to consider a wide range of views from different stakeholders and the different evidence provided as part of this extensive consultation. Although there was some concern over the level of parking being proposed on new residential estates, there was also concerns over a lack of parking in new estates which could lead to vehicles parking on footpaths and verges</p>
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	<p>being factored into the SPD is required. Whilst Durham as a County does have a large rural area with potentially higher levels of car ownership, the majority of housing commitments and allocations are naturally directed towards more urban areas and locations which are sustainable, reducing likelihood of car ownership. However, another factor is the significant areas of deprivation, which is likely to reduce car ownership levels.</p> <p>9. Conclusion and Summary</p> <p>Bellway Homes would like to thank the Council for the opportunity to comment on the draft Supplementary Planning Document. We trust that these comments are helpful in trying to ensure the SPD is a useful tool for the purposes of development management.</p>	<p>causing inconvenience and possible safety issues to other residents.</p> <p>The residential parking guidelines are now broadly like those being used in Northumberland which is often used as a comparative authority to Durham and faces many of the same challenges relating to public transport provision, particularly in rural areas, viability and has similar (although slightly higher) car ownership levels. The Council therefore consider the parking standards in the SPD are reasonable and in step with those of similar authorities.</p> <p>The inclusion of garages as counting towards a parking space responds directly to concerns raised by the house building industry as part of the second public consultation phase. We understand the concerns of the Home Builders Federation around viability; however, our emerging evidence indicates that the new requirements will not have a significant impact on viability of new housing sites. This assumes that the additional parking requirement is unlikely to have a significant impact on the overall housing yield given the scope to absorb this within</p>
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		<p>incidental, left over spaces and private curtilage.</p> <p>Housing delivery in County Durham will however be monitored closely as part of our Annual Monitoring Report and if this SPD is having an adverse impact, the Council will consider a review of the parking guidelines.</p>
David Friesner	Please register my comments for the above consultation. Comments relate to the relevant Tables and paragraphs stated in the document.	Comment noted
Diane Foster	Yes	Comment noted.
Henry Cumbers-Historic England	Thank you for consulting Historic England on the consultation on the Parking and Accessibility Supplementary Planning Document. Historic Question 11 - Do you support the approach to setting guidance for parking and accessibility as set out in the SPD? Please give reasons for your answers. England has no representations to make on the SPD at this stage. If you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me	Comment noted

<p>Yvonne Flynn</p>	<p>Durham University would like to pass on the following comments in response to the 2023 Parking and Accessibility Supplementary Planning Document (SPD) (stage 3) Consultation.</p> <p>Please give reasons for your answers. In general, the University are concerned that this SPD will instigate an overprovision of parking at residential locations and destinations which will lead to an increase in vehicle trips, which as per the SPDs statement at 2.1 “Less frequent car use also improves air quality, combats climate change, and reduces congestion”, is at odds with Durham County Council’s (DCC) declaration of a “climate emergency”.</p> <p>DCC should abolish minimum motor vehicle parking requirements, except for accessible bays, to encourage less vehicle ownership and less people to drive.</p>	<p>Comment noted</p>
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<p>Laura Dodd-Lanchester Parish Council</p>	<p>At a recent Lanchester Parish Council meeting, Councillors discussed the above consultation and wish to make the following comments:</p> <p>Please give reasons for your answers.</p> <p>Introduction</p> <p>For several years, Lanchester Village has been and continues to be adversely affected by an abundance of parked cars in on-street areas, especially within residential estates, in close proximity to the main retail area along Front Street and within the immediate vicinity of each of the primary and secondary school (and college) located in the village.</p> <p>Councillors welcome the development of this SPD and its aim to improve aspects of parking and accessibility from development so that parking and accessibility become much more effective in local everyday activities.</p> <p>Councillors recommend that extensive pre-application meetings must take place with all interested stakeholders so that when new school and college developments are proposed, current issues and future challenges can hopefully be addressed and designed in to proposed schemes.</p>	<p>Comments noted.</p>
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<p>Sunny Ali - Highways England</p>	<p>Parking Guidance</p> <p>Please give reasons for your answers. We remain concerned that the Parking and Accessibility SPD continues to set minimum parking standards for residential parking. We believe this may result in excessive car parking, in turn encouraging more car trips to the development and journeys on our network. We remain concerned that this policy position would appear to build in car dependency at developments over the Plan period which conflicts with the Circular 01/2022. It also continues to conflict 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 strongly encourage Durham County Council to reassess the policy stance in relation to minimum parking standards.</p> <p>We note that for non-residential development, parking requirements are a “recommendation” and lower parking requirements can be negotiated with Highway Officers where the site is in an accessible location or in an LCWIP area. Please refer to our above concerns relating to Durham County Council’s definition of an accessible location.</p> <p>We would note that parking provision should be calculated based on the residual vehicle trips which have been calculated within the travel planning and Transport Assessment process. Sufficient evidence must be presented to us to justify how the residual vehicle trips will be achieved.</p> <p>In relation to electric vehicles (EV), we would expect EV charge points to be installed where developments include on-street or communal parking to support the government’s objective to end the sale of new conventional petrol and diesel cars/vans by 2030 and HGVs by 2040, and its commitment to decarbonise transport by 2050.</p>	<p>Getting the parking provision correct on new developments requires striking a delicate balance between the needs of different stakeholders.</p> <p>On residential developments, the Council must consider the needs of residents who require sufficient secure off-street parking and the needs of residents moving around developments, including those with mobility issues. The Council must also consider the principles of good design that make new housing attractive and viable as well as providing sufficient space which limits harm to residential amenity and provides space for service and delivery vehicles.</p> <p>The SPD has been subject to three rounds of consultation, so the Council has had the opportunity to consider a wide range of views from different stakeholders and the different evidence provided as part of this extensive consultation. Although there was some concern over the level of parking being proposed on new residential estates, there was also concerns over a lack of parking in new estates which could lead to vehicles parking on footpaths and verges</p>
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	<p>We would take this opportunity to encourage development promoters and local planning authorities to engage with us at the pre-application stage on the scope of transport assessments/statements and travel plans. This process should determine the inputs and methodology relevant to establishing the potential impacts on the SRN and net zero principles that will inform the design and use of the scheme.</p>	<p>causing inconvenience and possible safety issues to other residents.</p> <p>The residential parking guidelines are now broadly like those being used in Northumberland which is often used as a comparative authority to Durham and faces many of the same challenges relating to public transport provision, particularly in rural areas, viability and has similar (although slightly higher) car ownership levels. The Council therefore consider the parking standards in the SPD are reasonable and in step with those of similar authorities.</p> <p>The inclusion of garages as counting towards a parking space responds directly to concerns raised by the house building industry as part of the second public consultation phase. We understand the concerns of the Home Builders Federation around viability; however, our emerging evidence indicates that the new requirements will not have a significant impact on viability of new housing sites. This assumes that the additional parking requirement is unlikely to have a significant impact on the overall housing yield given the scope to absorb this within</p>
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		<p>incidental, left over spaces and private curtilage.</p> <p>Housing delivery in County Durham will however be monitored closely as part of our Annual Monitoring Report and if this SPD is having an adverse impact, the Council will consider a review of the parking guidelines.</p>
<p>Andrew Haysey</p>	<p>No:</p> <ul style="list-style-type: none"> - guidance seems to accept the principle of development in areas with poor access to public transport, walking and cycling. This is inevitable in some cases, but should not be allowed for any major proposals; - destination parking standards should be maxima in line with para 1.9; - approach to residential standards has significant drawbacks and needs further thought. 	<p>Comments noted.</p>

<p>Lichfields (on behalf of) Co. Durham Land LLP</p>	<p>Thank you for the opportunity to provide representations to the consultation on the latest draft of the Parking and Accessibility Supplementary Planning Document (SPD) undertaken by Durham County Council (DCC).</p> <p>This response sets out comments on behalf of Co. Durham Land LLP (“CDL”) in response to the latest draft of the aforementioned SPD. This covers several topics as follows:</p> <p>Implementation of the SPD</p> <ul style="list-style-type: none"> • Non-Residential Parking Accessibility • Residential Parking Standards • Residential Parking Accessibility <p>Implementation of SPD</p> <p>CDL welcomes the clarification which has been made since the previous iteration of the SPD which confirms that the SPD is ‘guidance’ throughout the document. However, CDL request further clarification on how this guidance will be applied in the determination of planning applications. Assurance is required through the wording of the document of how the SPD will be weighed against various other material considerations in decision making. We raise concerns that, given the specific and quantitative nature of much of the content of the SPD, that little flexibility may be given on these matters despite the label of the document as ‘guidance’.</p> <p>We request that further clarity is provided within the adopted document to set out that the requirements of the SPD will not be applied to applications for Reserved Matters or the Discharge of Conditions where outline planning permission (and therefore the number of units on a site and viability) has been established based upon current standards. To implement any additional standards at this stage could increase the land-take associated with highways and car parking with potential knockon effects on housing delivery and viability.</p> <p>Conclusions and Recommendations</p> <p>CDL conclude that the SPD cannot be adopted before the following recommendations have been actioned. To adopt without making these changes</p>	<p>The Council notes all your detailed comments and thanks you for the time taken to read and offer suggestions on how the SPD can be improved. While it is not possible to incorporate all your suggestions, we have taken onboard many of the points onboard and welcomed your analysis.</p>
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would have the effect of restricting the delivery of sustainable, and 'add unnecessarily to the financial burdens on development', contrary to published Planning Practice Guidance (Paragraph: 008 Reference ID: 61-008-20190315). With regards to an appropriate distance to a bus-stop this includes:

- Up-to-date evidence of how far people are willing to walk to a bus-stop;

- The delivery of efficient bus services (including through consultation with the relevant bus operator);

- The form of the settlement and the ability to deliver the necessary number of new homes within the ideal distance of an efficient bus service;

- The availability of other services within a settlement; and

- The quality of the walking route.

CDL would like to take the opportunity to thank the Council for the opportunity to comment on the draft SPD. We trust that the comments will be given due consideration before the document is finalised and adopted.

Please get in touch should there be any queries at all regarding these comments.

<p>John Lowe (Durham City Trust)</p>	<p>The two key paragraphs of NPPF relating to parking standards are 107 and 108. Does the proposed SPD comply with para. 107?</p> <p>The Trust considers that the SPD complies with 107(e) in ensuring that EV change points are provided.</p> <p>The SPD is structured around the different use types of developments, so to some extent 107(b) is covered. Where there might be a failing is in mixed-use developments where communal parking can cater for non-residential uses “which will tend to peak during the daytime when residential demands are lowest” (Manual for Streets, para. 8.3.11). There is no acknowledgement in the SPD that mixed-use development (or infill developments in a mixeduse area) might need handling differently.</p> <p>The SPD does not consider local car ownership levels, 107(d) in any meaningful way. The policies are county-wide, and the local car ownership levels vary considerable across the county (see the appendix). The highest rate of car ownership across the county's Middle Super Output Areas in the 2021 census is double the lowest rate.</p> <p>Nor do the policies truly take into account the accessibility of the development, 107(a), or the availability of and oportunities for public transport, 107(c). The key point from the opening of para. 107 is that “policies should take into account” these criteria. The most significant elements of the SPD are the tables of recommended parking rates. Unlike previous adopted standards, the most recent being the County Durham Parking and Accessibility Standards 2019, which all had a separate column for town centre parking rates, the tables show no variation according to the accessibility of the site.</p> <p>The only way in which the SPD takes into account 107(a,c) is by stating that exceptions can be made. In effect, the policy only takes these criteria into account by disapplying the policies! In the Trust's view, 41 this does not</p>	<p>The Council notes all your detailed comments and thanks you for the time taken to read and offer suggestions on how the SPD can be improved. While it is not possible to incorporate all your suggestions, we have taken onboard many of the points onboard and welcomed your analysis.</p>
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demonstrate compliance with the National Planning Policy Framework.

The Council justifies this approach in para. 2.10 by saying that it will “simplify guide [sic] for all non-residential developments, whilst giving officers the flexibility to make the best decision ... based on the site-specific circumstances”. This is coupled with a definition of an accessible location where any site close enough to a bus stop with just two buses an hour is considered accessible, and a reference to LCWIPs which now cover all the major towns in the county.

The proposed SPD simplifies to the extent that it offers no meaningful guidance to developers wishing to make their sites accessible and sustainable for “promoting sustainable transport” in line with chapter 9 of NPPF.

The Trust's concern is shared by the Highways Agency in its well-argued response to the 2022 consultation. The Trust's proposals in the attached Appendix offer a means of complying with para. 107 for residential parking standards. Reintroducing a column with reduced town-centre parking rates in Tables 1-4 would improve compliance for the non-residential aspect of the SPD .

NPPF compliance: maximum parking rates

Paragraph 108 of the NPPF covers the circumstances in which maximum parking rates can be applied:

The Inspector of the County Plan very clearly stated in para. 162 of his report that in order for Policy 21 to be effective it needed to set out principles including to “limit the provision of car parking at destinations to encourage sustainable modes of transport” and that the Council must “prepare a supplementary planning document ... consistent with those principles”.

This clearly suggests maximum parking standards were thought to be appropriate . The Trust has raised this in each round of consultation, but the Council's response has been that it considers there is no clear or

compelling justification (as required by NPPF 108) that would allow maximum parking standards to be applied.

The Trust considers that the Council is setting the evidential bar too high. Nottingham City Council's Local Plan was adopted in 2020 and clearly must be considered to comply with NPPF paragraph 108. In para. 4.183 of the supporting text the use of maximum parking standards is justified as follows:

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

There is no part of this justification which could not be applied to Durham City or other highly accessible locations in the county. Nottingham even has found the justification to go beyond what the Inspector required of Durham's plan by setting maximum parking standards for residential use as well as non-residential.

If further justification were needed, Durham County Council can point to the use of Park and Ride, a congestion zone, controlled parking zones and the declaration of an Air Quality Management Area as justifying the need to manage the local road network in Durham city. Furthermore, across the whole county the 2022 Climate Emergency Response Plan 2 envisages a future of lower car ownership, shared ownership of vehicles, and investment in public transport and walking and cycling infrastructure, all of which can enable, and be reinforced by, reductions in the level of car parking provision.

If the Council cannot find justification to do what the Inspector instructed and apply maximum parking standards through the SPD , how can it

possibly find the evidence to defend against an appeal should officers try to impose a maximum in a particular case? The SPD is further weakened by the changing of terminology throughout from “standards” to “guidance”.

The Highways Agency, in its response to the 2022 consultation, was also very critical of the decision against setting maximum parking standards . The Highw ays Agency referred to the Net zero highw ays plan and the DfT's Decarbonising transport (July 2021) and the need to reduce demand for car tr a vel to respond to the climate emergency. The Highways Agency remarks noted that minimum parking standards , as used in the SPD, “generally do not encourage sustainable travel” 42 and that the Council's approach “may result in excessive car parking, in turn encouraging more car trips”. The Agency was also concerned that the approach might “lead to developers not funding public transport improvements due to excessive parking provision resulting in development with less demand for public transport facilities” and that the policy position conflicted with the Agency's net zero highways plan. The Agency remarked on the lack of clarity in the SPD regarding exactly how flexible highways officers would be when considering allowing a lower parking requirement in accessible locations.

The Trust concurs with all these observations, and is dismayed that the Council has made no substantive changes to the basis of the SPD.

In summary, the Trust does not support the general approach to setting guidance as it is considered not to comply either with the NPPF or what the Inspector directed was required to make the County Plan effective.

Errata

Para. 2.10 says “... proposing to take this approach to simplify guide for all non-residential developments” but the word “guidance” is probably intended instead of “guide”.

	<p>Paragraph 3.6 refers to section 3.14 but the correct reference is 3.15.</p> <p>Table 4 includes a typo “Sperate” in the long stay cycle parking requirement for FE colleges and for Schools.</p> <p>Para. 4.1 talks of the “content of the development” but it should probably be “context”.</p> <p>Table 5 refers throughout to para. 4.16 for detail on the cycle parking requirement, but the correct reference is 4.17.</p>	
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No. of Comments - 14

Total number of comments - 61 comments were received from 15 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 Post: ‘FREEPOST Spatial Policy’ (please note no further information is required)