Planning - Central/East
Planning Development (Central/East)
PO Box 616
Durham
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29 March 2014

For the attention of Mr Barry Gavillet, case officer.
dmcentraleast@durham.gov.uk

Dear Mr Gavillet,

Re: PLANNING APPLICATION NO DM/14/00264/FPA

Redevelopment of Neville's Cross Club site to provide student accommodation.

I write in connection with the above planning application on behalf of Durham University Bicycle User Group (DBUG). We have examined the application and plans and know the area well. We wish to comment on the development's cycle and car parking provision and location.

Cycle Parking Provision

From examining the application it appears that the proposals are to provide 8 cycle parking spaces, 8 car parking spaces, and 1 disabled parking space for accommodation totalling 33 student bedrooms. It is not clear whether the cycle parking is either to be covered or in a secure area. The site plan of external works includes a photograph of a partially-covered cycle rack, but the rack itself is of an old-fashioned design where the bicycle is supported by gripping the front wheel, and we hope therefore that it is not representative of the actual intended provision.

DBUG are of the opinion that eight cycle parking places is inadequate for 33 students and their guests, but is a better ratio than some large developments proposed in the city.

Durham County Council Accessibility & Parking Guidelines 2003 (DCCAPG) state that student accommodation should provide a minimum of:

> 1 secure cycle space per 5 student beds (Table 1 on p. 28); and
>
> Long stay:short stay ratio @ 1:2 (Figure 2 on p. 6)

It is not totally clear from DCCAPG whether short-stay cycle parking spaces for visitors should

be in addition to the long-stay spaces for residents (interpretation A), or if Table 1 gives the total minimum provision and the ratio of long to short-stay spaces is accommodated within that total (interpretation B).

Applying these guidelines to the Neville's Cross development we would get the following:

Interpretation	Spaces for residents	Spaces for visitors	Total
A	7	13	20
B	2	5	7

The number of visitor spaces in interpretation A would seem excessive, and indeed the 1:2 ratio (long to short stay) in DCCAPG seems highly inappropriate for a residential facility. But in interpretation B, a mere 2 covered spaces for a development for 33 residents is clearly quite insufficient.

DBUG is therefore of the opinion that the Council's current guidance on cycle parking spaces for student accommodation is not fit for purpose.

Fortunately the guidance does allow for planning requirements to be varied if the circumstances warrant it. Page 4 of DCCAPG states "Should it appear that in particular circumstances this provision is inadequate to meet the demand for cycle parking then additional provision will be required".

After DCCAPG was adopted, University car parking policy changed to restrict student parking at University academic locations and there has been a subsequent increase in the number of students cycling to campus instead. DBUG would contend that these circumstances call for an increase in provision.

We must therefore look beyond the DCCAPG for more realistic guidelines on cycle parking provision for students. Current Durham University policy is for its new builds to achieve at least a BREEAM Excellent rating. One aspect assessed by BREEAM is cycle parking and the guidelines for developments of student accommodation state a ratio of 1 covered secure space per two student residents.

Applying those BREEAM guidelines to the redevelopment of Neville's Cross Club would provide 17 covered & secure spaces for residents. BREEAM guidelines would allow for some of these to be visitor cycle parking spaces (which ideally should be near building entrances and not in a secure compound). DBUG is of the opinion that provision of this magnitude would be 'best practice' and provide sufficient spaces to meet the demand from residents now and in the future.

In case this is thought excessive, may we offer two further examples from other local authorities:

Transport for London: Cycle Parking Standards (proposed guidelines)
http://www.tfl.gov.uk/assets/downloads/Proposed-TfL-Guidelines.pdf

Student accommodation: 1 space per 2 students

Cambridge City Council: Cycle Parking Guide for new residential developments (February 2010) https://www.cambridge.gov.uk/sites/www.cambridge.gov.uk/files/docs/CycleParkingGuide_std.pdf

Appendix A: student accommodation: 1 space per 2 students (in city centre areas)
plus 1 visitor space per 5 students

Cycle parking location and type

The application does not explain the type of cycle accommodation which is proposed.

For residential blocks we would expect the cycle parking provision to be fully enclosed to shelter the bicycles from all weather, and for the compounds to be secured and accessible only by residents. Without fully-secured storage the racks could become a target for thieves when unattended during the day or overnight.

Providing cycle storage which is fully secured also entails the provision of adequate spaces for other cyclists visiting the property to lock up their bikes in short-term racks, as discussed above. As the external works plan in the application refers to 8 cycle spaces in a single rack, this suggests that either the spaces proposed will not be adequately secured or there will not be provision for visitors. Inadequate visitor provision could encourage 'nuisance' ad-hoc locking of cycles to street furniture in other areas of the development and locality.

BREEAM compliant cycle storage will be covered, fixed to a permanent structure (building or hardstanding), in a prominent site location that is viewable/overlooked from either an occupied building or a main access to a building (or alternatively has CCTV surveillance), lit and close to the entrance.

Student transport in Durham

Many of the other comments on this development submitted so far make reference to student car parking and express concern that eight car parking spaces will be insufficient, leading to pressure on places in neighbouring residential streets, which are already adversely affected by parking at primary school drop-off times. Some respondents go so far as to suggest there should be one car parking space per student bedroom, which would pretty much prevent the site being redeveloped as student housing.

Despite the high cost of car insurance for young drivers, and mounting costs of fees and accommodation, there is still a proportion of students keeping a car in Durham. According to last year's Durham University green travel survey about 6% of students regularly travel by car to the university, though this survey includes Stockton where the proportion driving is higher. Even if the proportion of students driving remains static, the increase in student numbers leads to an increase in total numbers of students bringing a car to Durham. This increase contributes to road congestion across the city, the pressure for parking in residential streets and around the university, and generally appears to reduce the options available to politicians, planners and highways officers who feel that the only option is to accommodate the extra vehicles, often at the expense of space currently available to pedestrians and cyclists.

Studentification in Durham has made national newspapers recently, and the high response levels to other planning applications recently shows the depth of concern among long-term residents of the city. Clearly providing one car parking space per adult becomes unsustainable (if indeed it ever was) when family homes are converted to student housing for four or five students, and higher density developments such as the Neville's Cross Club proposal also put strain on the surrounding area if car use is not restrained.

Of course students are by no means the only contributors to increased car dependence in the city. Measures that encourage cycling and discourage car use will bring economic, health and well-being benefits to the wider population also.

It is not possible to tackle these issues by providing more car parking spaces in the city and more road capacity for cars: that would be utterly unsustainable and would destroy Durham. The County Council must devote every effort to promoting alternatives such as walking, cycling

and bus travel. Student travel in Durham is badly served by bus routes, and the few useful routes are badly held up by road congestion. Walking is the predominant form of transport among students, but for faster personal transport options cycling must be the preferred solution and car driving discouraged.

Students deserve better provision, both in terms of cycle storage and in terms of cycle routes. Most converted houses have little, if any, cycle storage provided, and there is little cycling infrastructure within the city on the routes to and between university sites. It is thus very important that planners insist on a high level and a high quality of cycle storage at all new student developments, and have regard to the local cycle infrastructure when assessing the suitability of the site for accommodating students.

Other recent planning applications for student flats have promised car-free conditions on the residents. Even though this development is smaller, and permission for a car park already exists within the site, the change of use is substantial and the concerns of local residents would be alleviated to a large extent if this development could also be car-free and marketed to the majority of students who are happy not to use a car in the compact city of Durham.

Summary

DBUG requests that the planning authority place a condition on the developers for the provision of a minimum of 17 covered cycle parking spaces in a secured area. Ideally these would be fully-covered. This would satisfy the ratios recommended by BREEAM, Cambridge City Council and TfL. In addition, if possible, there should be provision for visitor cycle parking.

Such provision could easily be accommodated on the site by removing one of the car parking spaces. Many new student developments are being designed to be car-free. This should also be considered for this development. Currently the car parking provision proposed is not far from the upper limit of 1 place per 3 occupants stipulated in DCCAPG, and well in excess of the 2 places necessary to accommodate the proportion of students regularly travelling by car to the university. In fact, providing eight car spaces, as proposed, would have the effect of promoting more car use among students.

The Council's guidelines (dated 2003) should be revised to take account of national standards and the increased popularity of cycling, and the clear need to promote cycling in Durham City to alleviate car parking and congestion problems. Although the developer's proposals satisfy the Council's current guidelines, the authority has the power to vary this guidance and we would contend that circumstances warrant this. Revising the guidelines, however, would provide a firmer framework for the future.

Although this development may not be of a scale where large Section 106 payments might be arranged, and therefore there may not be funding arising to improve cycle routes in the area, we would ask it to be noted that the concerns we have previously expressed about the A167 cycle route apply to this development too, as the A167 leads from the site to the local supermarket and to the university. For example, see our response to application CE/13/01667/FPA. In general, the Council needs to make sustained and serious investment in improving cycle routes around the city, particularly for access to the university.

Yours sincerely,

Matthew Phillips
(on behalf of DBUG)