

# THE CITY OF DURHAM TRUST

Response to the County Durham Plan Pre-Submission Draft

## COUNTY DURHAM PLAN PRE-SUBMISSION DRAFT - Consultation October 2013

For Office Use Only

Consultee ID:

Received:

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Please use a separate form for each representation.

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Preferred method of contact (please tick): Email  Letter

To which part of the County Durham Plan does your representation relate?

**POLICY 48 Delivering Sustainable Transport**

**Q1**

**Do you consider that this policy/proposal of the Pre-Submission Draft Local Plan to be Legally & Procedurally Compliant and Sound?**

**Legally and Procedurally Compliant** No (Go to Q3)

**Sound** No (Go to Q3)

**Q2** – not relevant.

**Q3**

**Why do you consider that this Policy/Proposal of the Pre-Submission Draft Local Plan is not Legally & Procedurally Compliant or sound? Is it:**

**Positively Prepared?** No

**Justified?** No

**Effective?** No

**Consistent?** No

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### Q4

**If you do not consider this policy/proposal of the Pre-Submission Draft Local Plan to be Legally & Procedurally Compliant or Sound please use this box to explain why.**

1. While there is a great deal proposed in Policy 48 of the Plan with which the Trust is in agreement, it is not possible to find Policy 48 (or Policies 49 and 50) positively prepared or justified. The transport aspects of the Plan will be taken out of the Council's hands in April 2014 and its proposals will need to be justified in any emerging combined Transport Plan.
2. In relation to Durham City the measures currently proposed for encouraging a shift from the use of the private car are effectively undermined by Council's road-building programme, for this must make private vehicle use even more attractive. The relatively small amounts which the Council proposes to spend on infrastructure to support sustainable travel options cannot be described as creating a balance in favour of sustainable modes, as the NPPF requires, when compared with the sums of c.£80 million which the relief roads would be likely to require. In this respect, Policy 48 remains unjustified, **lacking in positive preparation and not yet consistent with the NPPF.**
3. Also unjustified in the Plan and in the Integrated Transport Approach for Durham City are the exaggerated claims about damage to Durham City and to possible future investment caused by traffic congestion. It may be mentioned that a series of visiting major architects and planners from the South have simply smiled when they have observed what we have call our traffic problem, which is a typical peak hour phenomenon. A comparative measure is given by a study of late 2008<sup>1</sup>, which ranked all the constituencies in Britain by levels of congestion, and placed Durham City only 323<sup>rd</sup> out of 628, barely in the top half.
4. Both the Council and Central government will need at some stage to abandon the deeply held planning assumption that overall volumes of traffic in an area will always increase, as this is increasingly contrary to the evidence<sup>2</sup>.
5. The draft plan refers on page 70 to options considered as part of the 2006/7 Transport Innovation Fund modelling. The draft plan lacks positive preparation in that the Council presents a biased description and interpretation of the analysis carried out as part of the TIF work and has chosen to ignore the clear evidence from that study that traffic restraint measures, coupled with support for public transport, were shown to generate substantially positive net benefits<sup>3</sup> and that when this analysis was reworked to include highway building options the latter were shown to generate significantly lower net annual benefits than options involving a traffic restraint cordon and discounted bus fares<sup>4</sup> The fact that councillors subsequently made a decision on political grounds not to apply traffic restraint policies more widely does not justify the exclusion of such options from future evaluation processes, especially since the TIF

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1 See *Keep Moving Government* [http://www.keeppmoving.co.uk/home\\_content.aspx?content=government](http://www.keeppmoving.co.uk/home_content.aspx?content=government)

2 e.g. <http://www.parliament.uk/documents/commons-committees/transport/POST%20briefing%20on%20peak%20car.pdf>

3 Jacobs, *Durham TIF study: Technical note DT 7* (2008), p 27.

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analysis demonstrated their efficiency in both traffic management and net social benefit terms.

6. The most used form of public transport in County Durham is the bus, yet the plan says too little on the factor that most influences the use of this mode, the price of tickets. This is in a context that has seen the cost of public transport rise more quickly than that of the private car. Given the increased traffic that must result from the proposed new housing developments around the Durham City and from the newly induced traffic generated by the two relief roads, a far stronger series of countermeasures would be needed to reduce the future amount of traffic below current levels, in the form of more significant bus subsidies for the area of the whole city or an extended congestion charge.
7. At the moment any proposed financial support for bus services is piecemeal (“Where appropriate, developers will be asked for a financial contribution so the Council and bus operators can work together to improve bus provision for particular site” (p. 187) ). The Integrated Transport Approach for Durham City is also lukewarm on this issue, timid of sustainable transport measures once they suggest expenditure, and with no mention of any measures that might raise revenues by constraining the private car, such as an extended congestion charge or workplace parking levy. As a consequence the Council’s options on supporting buses are severely limited. The aims of ensuring adequate local bus services to the new settlements proposed at Sniperley and of Arnison are said to be dependent on “dialogue with operators to consider feasible options. Service provision of this nature could require additional resources and financial support.” Strikingly the most obvious and effective form of bus provision for these settlements, a direct link from each to the centre of Durham City, is also regarded very warily because of possible effects on the operators’ other services.

### Q5

**What change(s) do you consider necessary to make this policy/proposal of the Pre-Submission Draft Plan Legally & Procedurally Compliant and Sound?**

The full range of sustainable transport and traffic restraint measures proposed should be implemented but without the unnecessary road building programme for Durham City. They should be incorporated into the more sustainable and less parochial transport planning to be expected of the new regional transport body that comes into existence in April 2014.

### Q6

**Do you wish to participate in the Examination in Public? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the Examination).**

Yes

### Q7

**Do you want to be informed of the following:**

**The submission of the Local Plan to the Secretary of State? Yes**

**The publication the Inspector report? Yes**

**The adoption of the County Durham Plan? Yes**

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4 Jacobs, *Durham TIF study: Technical note DT 7* (2008), p 27.