Response to the County Durham Plan Pre-Submission Draft

Durham City Strategic Sites Selection Process

- 1. This paper supports our submission on Policy 8 of the Pre-Submission Draft. As our submissions on the Population and Employment Forecasts and elsewhere make clear, we do not accept the case has been made for an increase in the size of Durham City, nor do we accept the population forecasts. This critique is effectively a long-stop: if the conclusion is reached that more housing is required in the vicinity of Durham City than can be accommodated in brownfield sites within the Green Belt, then positioning it outside the Green Belt is a sustainable alternative.
- 2. We made this argument in submissions on earlier iterations of the County Durham Plan, most recently the *Preferred Options*, when we said (at paragraph 5 of our answer to Question 9 about Policy 7):

It should be noted that the Inspector in 2002, in anticipating possible future development, came to a different conclusion. Acknowledging the small size of the Green Belt, and recognising the need for sustainability, he concluded that development outside such a comparatively narrow Green Belt could "be located so as to minimise travel distances for work and leisure by being at existing or proposed public transport nodes and close to existing facilities in the larger settlements with better facilities beyond the GB." (para 7). The outer edge of the Durham Green Belt in fact can be reached in any direction in 10-15 minutes by public transport. The Trust therefore maintains that the Council is (a) flying in the face of time-distance reality, as well as the Inspector's conclusion, (b) turning a blind eye to the NPPF. (The latter also states that authorities "should consider the consequences for sustainable developmenttowards locations beyond the outer Green Belt boundary" (para 84).)

- 3. The Justified aspect of the soundness test requires that the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Given the Inspector's comments quoted above, the Plan should have tested whether in fact the argument that development could be placed outside the Green Belt held water.
- 4. It did not. Instead an arbitrary 5km radius from the centre of Durham was investigated. This was wrong on two accounts:
 - i. The main focus proposed for employment is Aykley Heads, so why was the investigation not centred there?
 - ii. The choice of a 5km radius should have been justified. In fact as we show below, reasonable travel times obtain within a much larger radius we tested out to 10 km.
- 5. We looked at travel times when using both public transport and a private car, and journeying to not only the City centre but also to County Hall (Aykley Heads) and the main University site on Stockton Road. The work was done by a single person using a home computer and a broadband connection. It would have been proportionate for the Council, with its much larger resources, to have carried out a similar exercise.

Response to the County Durham Plan Pre-Submission Draft

Public Transport

- 6. The online transport planner at http://jplanner.travelinenortheast.info/planner was accessed in September 2012. For 35 routes departing the Bus Station, North Road, or Milburngate the places reached after 10, 15 and 20 minutes were noted. The results are documented in the attached spreadsheet Durham Buses.xls.
- 7. These locations were also plotted on a Google map see <u>http://goo.gl/maps/RUIEi</u> and maps 1 and 2 (at end).
- 8. Plawsworth, Nettlesworth, Sacriston and Witton Gilbert are all within 10 minutes of the Bus station, and and Chester-le-Street (Hermitage) and Edmondsley within 15 minutes. Buses on these routes arrive at Durham, Aykley Heads 4 minutes before the Bus Station. Consequently we conclude that these is a wide choice of places north and north-west of Durham, beyond the Green Belt, that are within a short bus ride of this strategic employment site.
- 9. Bowburn, Tudhoe and Croxdale are similarly within 10 or 15 minutes of the Bus Station, and buses on these routes travel via the New Inn stop for the University (Palatine Centre) site, arriving there 5 minutes before the Bus Station. A little further out, Coxhoe, Ferryhill, and Spennymoor are all within 20 minutes of the Bus Station, or 15 minutes of the University, which has over 3,000 staff members and 15,322 students¹.
- 10. Other places beyond the Green Belt but within 15 minutes of the Bus Station are West Rainton, Sherburn, Sherburn Hill, Brandon, Meadowfield, Langley Moor, Ushaw Moor, Broom Park and Bearpark.

Private car

- 11. A further exercise was carried out to determine the travel times using a private car.
- 12. Although the County Durham Plan proposes a strategic employment site at Aykley Heads, the search carried out as part of the Green Belt Assessments referred to in paragraph 4.106 of the Pre-Assessment Draft only looked within a 5km radius and centred its search on the Market Place some 1.2 to 1.5 km from Aykley Heads.
- 13. For our search we looked out to a radius of 10km from the Market Place and calculated travel times to three sites: County Hall (for Aykley Heads), the Prince Bishops Shopping Centre (for the Market Place) and the Palatine Centre of Durham University. The results of our search are shown in maps 3, 4 and 5 at the end of this paper. They show a very considerable number of places within a 10 or 15 minute drive of these destinations.
- 14. The technique used in our search may be summarised as follows:
 - i. Ordnance Survey have made a number of datasets freely available via their OpenData[™] product². These include postcode data in Code-Point[®] Open and maps in OS Vectormap[®] District. Both were used for this exercise.
 - ii. The postcode file lists every UK postcode and gives the location of its centre as a 12 figure grid reference, accurate to 1 metre. From this were selected the 4,624 records for the postcodes within a 10km radius of the Market Place in Durham.

Page 2

¹ See https://www.dur.ac.uk/about/facts/

² See http://www.ordnancesurvey.co.uk/business-and-government/products/opendata-products.html

THE CITY OF DURHAM TRUST

Response to the County Durham Plan Pre-Submission Draft

- iii. Google provide an applications program interface (API) to its Google Maps service. We used the Distance Matrix Service³ which computes travel distance and journey duration between origins and destinations using a given mode of travel, in our case a motor car. We called this service using the 4,624 postcodes as origins and the postcodes of County Hall (DH1 5UL), the Prince Bishops Shopping Centre (DH1 3UJ) and the Palatine Centre, Durham University (DH1 3LE) as destinations. The results were stored in a database and subsequently downloaded as a spreadsheet, attached as timings.xls
- iv. The results for each postcode were then colour coded to show the different travel times and plotted on maps using Quantum GIS software. The extent of the existing (since 2004) Green Belt was added using a shapefile kindly provided by the County Council GIS team. There are three maps, numbers 3, 4 and 5, one per destination.
- 15. The maps show that virtually every postcode location within a 10km radius is also within a 20 minute drive from one of these destinations. An examination of the data confirms this impression: only 1.25% of origins are beyond 20 minutes travel time. Many are much closer.
- 16. Map 3 illustrates that Sacriston, Witton Gilbert, Bearpark, Langley Park and much of Ushaw Moor are within a 10 minute drive of County Hall, proposed site of the strategic employment site. Langley Park, Meadowfield, West Rainton, Bowburn, Sherburn and a good part of Chester-le-Street are all within 15 minutes.
- 17. Map 4 shows that West Rainton, Sherburn, Bowburn, Croxdale, Langley Moor, Bearpark, Witton Gilbert and half of Sacriston are within 10 minutes of the Market Place. Notable settlements within 15 minutes include Thornley, Coxhoe, Tudhoe, Meadowfield, Brandon, Ushaw Moor, Langley Moor and the rest of Sacriston.
- 18. Map 5 shows travel times to the new University HQ at the Palatine Centre. Sherburn, Bowburn, Croxdale and Langley Moor are all within 10 minutes' drive. Spennymoor is within 15 minutes drive of the University, along with Coxhoe, Meadowfield, Ferryhill and a number of smaller settlements.

Conclusion

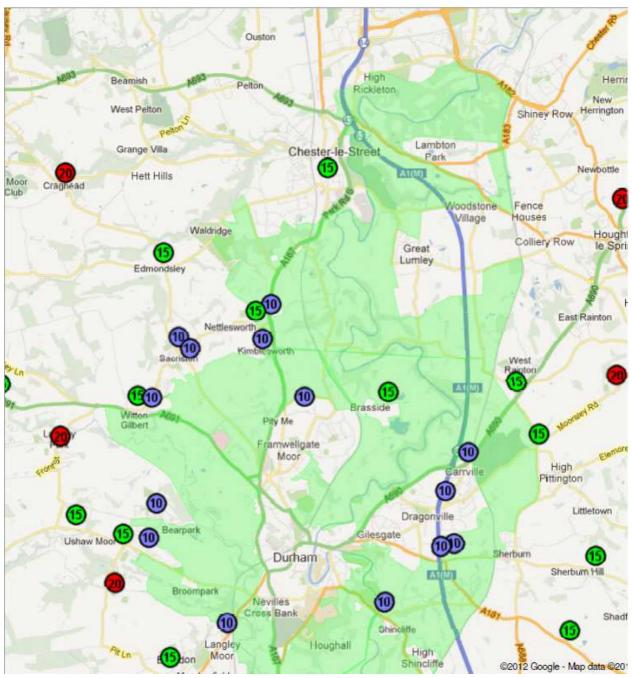
19. The Green Belt Assessments referred to in paragraph 4.106 of the *Pre-Assessment Draft* are consequently **unsound** because they did not consider the reasonable alternative of placing development outside the Green Belt but still within easy travelling time of key sites in the City, whether using public transport or private car.

³ See https://developers.google.com/maps/documentation/javascript/distancematrix

THE CITY OF DURHAM TRUST

Response to the County Durham Plan Pre-Submission Draft

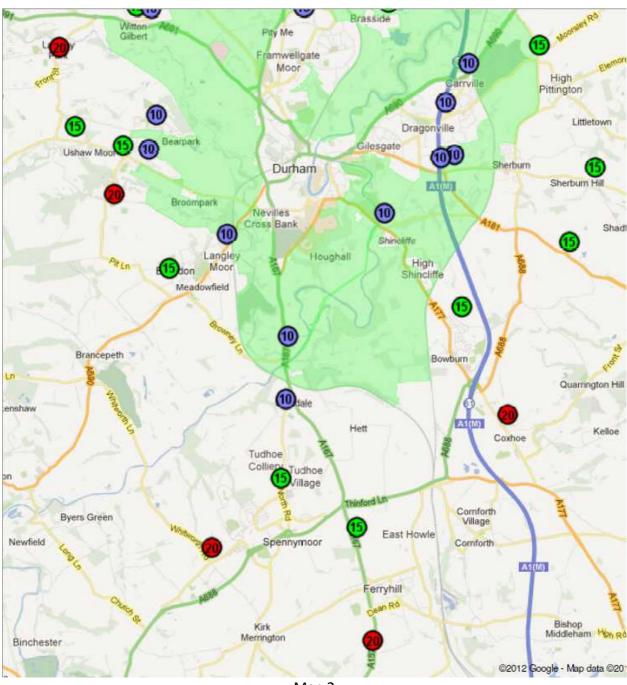
Map 1: travel times to Durham Bus Station (North map)



Showing places within 10 minutes (blue markers), 15 minutes (green markers) and 20 minutes (red markers) from Durham Bus Station by scheduled bus.

THE CITY OF DURHAM TRUST

Response to the County Durham Plan Pre-Submission Draft

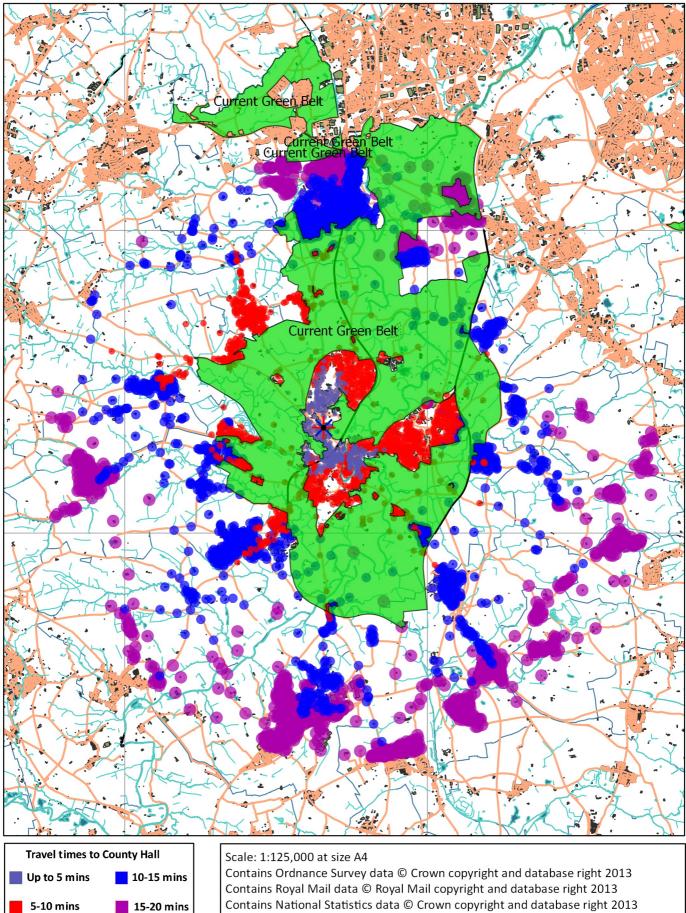


Map 2: travel times to Durham Bus Station (South map)

Map 2

Showing places within 10 minutes (blue markers), 15 minutes (green markers) and 20 minutes (red markers) from Durham Bus Station by scheduled bus.

Map 3: travel times to County Hall by private car



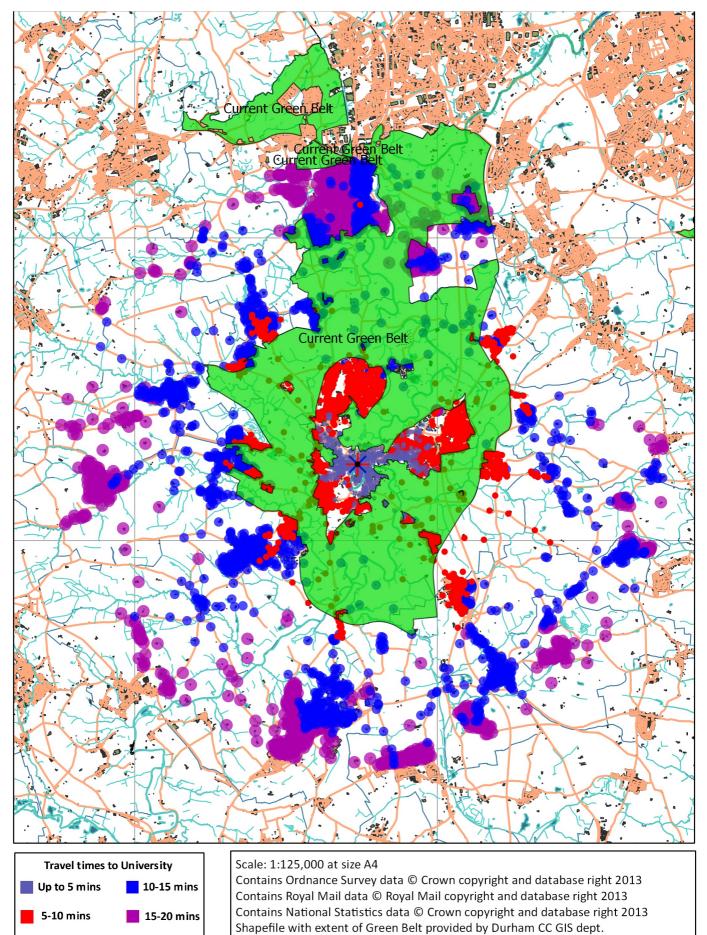
Contains National Statistics data © Crown copyright and database right 2013 Shapefile with extent of Green Belt provided by Durham CC GIS dept. Created by the City of Durham Trust using Quantum GIS

Page 6

Current Green Belt

The Trust, founded in 1942, is a non-profit-distributing company limited by guarantee registered in England and Wales, No. 377108 Registered as a charity, No. 502132. Registered with the Civic Trust. Registered Office BHP Law, Kepier House, Belmont Business Park, Belmont, Durham DH1 1TW

Map 4: travel times to the Market Place, Durham, by private car



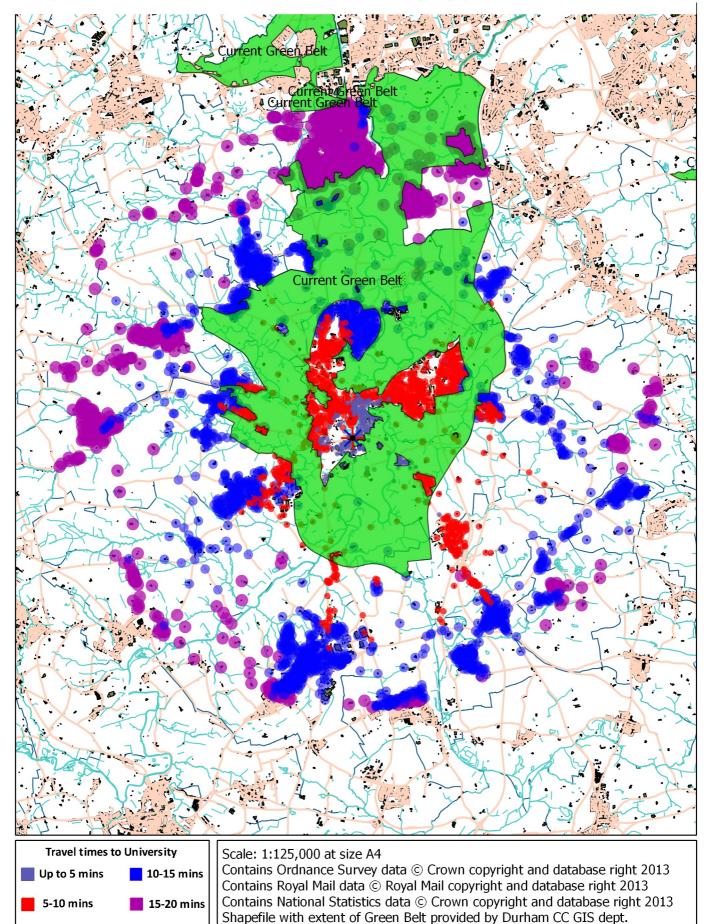
Page 7

Current Green Belt

The Trust, founded in 1942, is a non-profit-distributing company limited by guarantee registered in England and Wales, No. 377108 Registered as a charity, No. 502132. Registered with the Civic Trust. Registered Office BHP Law, Kepier House, Belmont Business Park, Belmont, Durham DH1 1TW

Created by the City of Durham Trust using Quantum GIS

Map 5: travel times to Durham University by private car



Page 8

Current Green Belt

Created by the City of Durham Trust using Quantum GIS

The Trust, founded in 1942, is a non-profit-distributing company limited by guarantee registered in England and Wales, No. 377108 Registered as a charity, No. 502132. Registered Office BHP Law, Kepier House, Belmont Business Park, Belmont, Durham DH1 1TW