

Matter 7.4: Western and Northern relief roads (Policies 9 and 10)

Reasons for submission

1. While the Trust stands by its 2013 responses to the Pre-Consultation Draft on Policies 9 and 10, the Evidence Library contains eight new documents prepared or commissioned by the Council since the consultation period closed which directly relate to these two schemes. These documents, many of which are highly technical, amount to almost 300 pages of additional evidence to be assimilated by respondents, and in the space available our supplementary submission can only touch on key elements which are relevant to the Trust's contention that these road proposals are unsound. Indeed, the introduction of this plethora of additional technical evidence so late in the process confirms, in the Trust's view, that these proposals have not been positively prepared and that the Council is seeking to find additional justification for its pre-determined proposals on a retrospective basis.
2. In addition to the requirement to respond to new material in the Council's evidence base, and also to correct parts of the consultation feedback report (Document C1), the Trust also seeks to introduce additional information to support its own case. At the most basic level, some of this information draws on more recent Department of Transport (DfT) series to bring up to date the statistics in its 2013 submission which indicate that the Council's position on traffic growth and congestion is not supported by objective evidence. The Trust also wishes to refer the Inspector to its supplementary submission on Matter 4, Policy 3, which points out that current ONS projections provide further evidence that the Council's population, employment and housing development targets are over-stated. Since these Council's forecasts provide the growth framework which is incorporated into its transport modelling, the latter too is predicated on the same unrealistic forecasts. Finally, the Trust would like to draw the Inspector's attention to new evidence on the air pollution effects of traffic growth.

Issues raised by Inspector

3. The Trust concurs wholeheartedly with the Inspector's identification of the key issues relating to these road schemes in para 7.4 d of INSP3. It considers that its previous submissions have demonstrated that these schemes are not justified, are undeliverable, and are inconsistent with the Council's Sustainable Transport Strategy as published in the current Local Transport Plan, the Durham Integrated Transport Approach and the Infrastructure Delivery Plan, and with reference to the strategic transport modelling work undertaken by the Council. The Trust considers neither of these proposals to be deliverable, environmentally acceptable, and viable. In relation to environmental acceptability, it considers in particular that the intrusion of both these roads into sensitive greenbelt would cause irreparable harm to the city's wider setting, and would lead to further development pressures on the Green Belt, some of which are already being evidenced by speculative planning applications.

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Traffic forecasting

4. Besides questioning the soundness of the Council's proposed development framework (which would itself be directly traffic generative, and therefore inconsistent with the Council's Sustainable Transport Strategy), the Trust's previous submissions drew attention to the growing body of national evidence which questioned the underlying assumption of GDP-related background growth in road traffic, and to the specific evidence in official DfT statistics which showed (a) that traffic on key routes around the city was falling, rather than growing; and (b) that, far from suffering from a congestion problem, County Durham's principal roads performed significantly better than both the regional and national roads in terms of journey times and the average speeds attained.
5. Our 2013 submission on Policy 9 contains at paragraph 22 a table extracted from DfT data which shows that traffic levels on the Crossgate Moor section of the A167, frequently identified as a problem, had fallen from a daily average of 27,676 vehicles in 2004 to 24,135 in 2012, and that this declining trend had begun well before the economic downturn. The latest DfT data shows this trend continuing into 2013, with a daily average of 24,048 vehicles. Similar trends are evident on other A roads around the city: for example, the stretch of the A177 between the A167 junction and Hollingside Lane averaged 8,609 vehicles in 2000, but 7,884 in 2013. The section of the A690 between Milburngate and the Gilesgate roundabout carried an average of 41,749 vehicles per day in 2000, rising to 42,469 in 2002; in 2013 the average was 41,443. This figure is at complete variance with the "60,000 vehicles per day" quoted in C1, page 22.
6. So far as peak conditions are concerned, DfT statistics show that the average time to drive a mile on council-managed A roads in County Durham in June 2014 was 1.81 minutes, compared with 2.14 minutes averaged across the north-east, and 2.46 for the whole of England. The average speed attained on Durham roads during the morning peak in June this year was 32.8 mph, 4 mph faster than the north-east average and fully 8 mph better than for the average for England.
7. These figures give the lie to any suggestion that Durham has an absolute or relative congestion problem, and while they are averaged across the county A road network, Tables 2-4 of the recently issued evidence paper, Document T25a, provides extremely interesting corroboration that the DfT averages are not significantly unrepresentative of local conditions on the network in and around the city. The consultants compared modelled and actual journey times between 8 am and 9 am on 2 July 2013 (ie, during school term time) on a 5.9 km route between the Potterhouse Lane roundabout on the A167 and the Neville's Cross junction, including a loop via Lowes Barn and the A690. Taking a mid-point of the modelled and actual journey times, these morning peak journeys achieved an average of 29.52 mph. While the variation in northbound and southbound times on an intersecting 2.8 km journey along the A691 between Lanchester Road hospital and the DLI turnoff was greater, the average of the two directions was as high as 28.12 mph over a much shorter journey.

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8. The Trust's previous submissions provided evidence of inconsistencies in the traffic forecasts used in the Council's then-available evidence papers, but pointed out that differences in the ways that the information was presented made comparison extremely difficult. While bespoke data was developed for the two micro-simulation reports now presented (T25 and T43), the problem is that the base data used in the Council's main model was generated in 2006. Though Document C1 claims that the model has been "fully recalibrated", this does not overcome the fact that the underlying material is now around eight years old.
9. There are also problems of consistency relating to the levels of development assumed at different stages in the Plan. The series of Jacobs reports culminating in T29 had assumed that developments by 2021 would require the construction of the Western Relief Road by then, but the table in para 6.2 of T29 sets out a revised forecast provided by the Council, which anticipates the delivery of only 150 houses on new sites by 2021. However, this advice from the client is ignored four pages later (after an unnecessary typology of attitudes to sustainability repeated from an earlier report) with the statement on the foot of page 6-56 that "the WRR should be prioritised for implementation **by 2021** due to its role of supporting development...whilst mitigating the local impacts arising from this growth and maintaining the wider operation of the network" [emphasis added].
10. The continuing weaknesses in the data and evidence sources available to the Council and its consultants are most clearly exemplified by T43, para 6.3. This AECOM report was commissioned to carry out micro-simulation of the effects of the Northern Relief Road, and identified "emerging stress" at key junctions by 2021 even under the Council's preferred scenario. Table 7 projects conditions forward to 2030, and forecasts the bizarre result, from the Council's perspective, that delays and speeds are significantly **worse** in the evening peak under the "preferred approach" (ie, with both relief roads) than under the "reference case" without them! After some lame references to different mitigation measures, and the need to "ensure that the local highway network surrounding the Arnison Centre does not suffer as a result of the implementation of the Durham Local Plan and the construction of the Northern Relief Road", para 6.3 ends abruptly with the statement that "Given the differences between the two 2030 models, no further outputs from Paramics model have been extracted." Or, to borrow a phrase from another computing genre, "Game over".
11. The summary in the final para of T43 contains the chastened comment "further mitigation measures will be needed to accommodate the construction of the Northern Relief Road, **particularly since the Northern Relief Road results in a significant increase in traffic in the study area being assessed**" [Emphasis added, but the Trust made this point in its 2013 submission.] The summary concludes "The results in Table 7 have shown that a similar level of network performance can be achieved with the implementation of the Durham Local Plan but the network needs to be carefully developed to do this." The word "similar" surely carries the connotation that the outcome would be comparable to that achieved with the existing network – hardly the evidence of justification that the Inspector has requested.

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Impacts of the two road schemes

12. In addition to the modelled disbenefits disclosed in T43 paras 6.3-4, the latest evidence papers confirm the concerns that the Trust's previous submissions expressed about the potentially severe effects that the Relief Roads would have on other parts of the existing road network because of diverted or extra traffic that would be added. Both T29 (para 5.6.5) and T25a (para 6.2) identify particular concerns about congestion on the approaches to Aykley Heads – it must be emphasised that neither of the relief roads will directly serve the Council's preferred strategic employment site, but instead access for the projected 6,000 jobs (4,400 net if the Council HQ relocates) would have to be achieved over the existing network, primarily the A691.
13. At a macro level, a clear effect of the provision of the Northern Relief Road would be to divert traffic off the A1(M) north of the Belmont interchange on to the County A-road network, one obvious contributor to the concerns identified in T43. In policy, road safety, and broader transport planning terms, such a diversion of traffic from the strategic national network on to local roads would be regarded as highly inappropriate.
14. At a different scale, T25a, T49, and T42 all confirm a significant increase in traffic on the C-category road serving Bearpark: an outcome which was categorically denied by a senior council official at a public meeting in the village, but again was identified in the Trust's 2013 response.
15. The Trust is no less concerned about the adverse qualitative effects of the relief roads on the environment and purpose of the Green Belt that would be the inevitable consequence of forcing these routes through unspoilt countryside that forms the setting of the city and the World Heritage Site. Again, these concerns were voiced in our 2013 responses, but Document C1 pays scant attention to them.
16. New Documents T10 and T11, which seek to address the effects of the two roads on historic assets, and T21, dealing with air, noise and water impacts, are therefore to some extent helpful in acknowledging the scale of some of these impacts, and it is clear that the authors of T10 and T11 had some difficulty with the effectiveness of some of the proposed mitigations – see, for example, T10, para 12, and T11, para 9-11. What also emerges is a general unease at the qualitative effects of these impacts – “tranquil” or “tranquillity” is a term that recurs in T10 and T11, and to the Trust this is a defining characteristic of these portions of the Green Belt and the city setting that would be crossed by the relief roads.
17. A limitation of T10 and T11 is that they deal essentially with static receptors – the listed buildings and non-listed heritage sites affected by the roads. While T21 refers on page 23 to linear assets in the form of the Lanchester Valley walk and National Cycle Route 14, there is no real analysis of the adverse impacts. But the destruction of the character and tranquillity of historic walkways, exemplified by Club Lane to the west of the city and Frankland Lane to the north, would be vandalism at least on a par with the impacts on listed buildings such as Kepier Farm or Aldin Grange Bridge. It is hoped that the Inspector will

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find the time to walk these mediaeval paths and pilgrimage ways to understand at first hand the scale of the impact the roads would have, and the impossibility of mitigating the damage to centuries-old community assets that would occur.

18. Alongside these geographically-specific impacts, the Trust also wishes to refer to the effects on air quality that would result from the Council's proposals to add significantly to the extent of the road network around the city. Whatever the doubts about the accuracy of the data that the Council is using, all the modelling shows that these new roads would of themselves generate more traffic – a point that is freely conceded by the evidence papers. The Council's tokenistic commitment to limited demand management does not overcome the fact that the outcome of its proposals will be an increase in car travel at the expense of more sustainable modes of transport.
19. A recent report by Public Health England has provided estimates of deaths attributable to air pollution at a disaggregated level.¹ For County Durham, the estimate for 2010 was 223 deaths, 4.3% of all deaths among those aged over 25.
20. The Council has recognised the air quality issues facing the county and city, and has established a technical working group and corporate steering group to address them. The Trust has seen copies of minutes of these meetings that were obtained through a Freedom of Information request, and it is regrettable that they have not been included in the Examination Library. It is clear from these minutes that the officials concerned regard road vehicle exhaust as a major cause of air pollution in Durham, and that they are concerned at increases in road traffic and that this concern extends to the effects of the relief roads.
21. In the Trust's view, the recently-published evidence on mortality associated with air pollution, and the Council's own commencement of action to respond to air pollution, is a significant new issue that requires to be addressed in any consideration of the Council's road building and traffic growth proposals.

Deliverability and justification

22. The Trust's 2013 submissions drew attention to the statement on page 3 of Document T26 that

Technical considerations affecting the deliverability of either Relief Road have not been considered in this study. Neither have we considered a value-for-money appraisal of either scheme. **Both would need to be completed before committing to fund and build either Relief Road.** [emphasis added].

22. In view of this explicit disclaimer by the consultancy firm that provided most of the technical evidence to the Council in support of the relief roads, the Trust argued that the delivery and justification for these schemes had not yet been demonstrated.

¹ <https://www.gov.uk/government/news/estimates-of-mortality-in-local-authority-areas-associated-with-air-pollution>

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23. The new evidence papers deposited by the Council do nothing to address this gap. If anything, by demonstrating the confusions within the Council's own forecasting, and the extent of the work that has still to be completed to finalise the design details to take account of mitigations proposed in T10, T11, and T21 and the issues around the intersection of the Western Relief Road with the Bearpark road, they indicate that the schemes are even less developed than appeared in 2013. The statistical weaknesses in the Council's wider planning framework also fundamentally affect the traffic forecasts.
24. Until firm cost estimates have been provided, and more reliable forecasts provided, the viability of the schemes in terms of the cost:benefit appraisal that would be required under DfT and Treasury Green Book procedures cannot be assessed. However, the harm that these schemes would do is clearly apparent, as is their inconsistency with the Council's own sustainability objectives.
25. Consequently, the Trust considers that the Council has not demonstrated that it is in a position to satisfy the tests set out by the Inspector in INSP3 para 7.4 (d). It considers that there is no acceptable wording to replace that in Submission Draft Policies 9 and 10 and related policies, and that as a consequence these proposals should be removed from the Plan.