Interim Sustainability Appraisal of the County Durham Plan Issues and Options 2016

This is an interim document whose focus is the key spatial options section of the Issues and Options document. It acknowledges that further approaches and options are to be still to be "developed and will be subject to SA following the attainment of consultation responses to the Issue and Options document "(p. 1). This consultation response therefore concentrates on elements of the interim sustainability assessment that relate most directly to the Trust's concerns with the Issues and Options document.

The report is partial in its focus on spatial policy. As such it inevitably risks distortion of a reality which is holistic, one in which other issues such as future transport planning and employment patterns must form a decisive influence upon the siting of future settlements. This partiality is reflected in the way the SA, assessing the various spatial options in relation to employment and transport provision as they currently exist, discusses the latter two mainly as passively reacting or responding to the housing locations, and less as being themselves possible agents of change in the allocation. The distribution of employment sites is recognised as crucial to the future distribution of housing, even as it is acknowledged that the Employment Land Review (2016) is still "emerging" and "to be developed". Likewise, the need for more transport modelling is noted. Recent proposals to extend the Tyne and Wear metro into County Durham, not mentioned in this report, would surely have had a significant impact on the study.

It is noted that a possible New Town in the county is listed and broadly assessed alongside the other spatial options but that this idea was not finally carried over into the Issues and Options paper. Would not the possibility of extending the Tyne and Wear metro suggest the wisdom of keeping open the possibility of a New Town?

The target figure of a 73 % employment rate for the county, taken up by the interim SA from the County Durham Sustainable Communities Strategy (p. 23), is discussed in the Trust's response to Question 5 of the Issue and Options document. It is noted that the issue of different employment rates for men and women, a key concern in the Trust's response, is not mentioned in the sustainability assessment, beyond the issue of increased rates of female employment projected largely as result of the "equalisation of the State Pension Age" (p. 58).

The Trust's scepticism about proposed relief roads in Durham City (in responses to questions 31 -33 in the Issues and Options paper, and to the separate consultation on the sustainable transport proposals) finds implicit support in current discrepancies between the account of the various spatial options in this interim Sustainability Appraisal and the way these options are presented in the Issues and Options paper. The latter states dogmatically that all 3 Spatial Options other than "wider dispersal" would require the building of a "Western Relief Road" or other "significant highway improvements" in Durham City. The Sustainability assessment, however, as might perhaps be expected from a paper compiled separately by officers from the Council's "Low Carbon

THE CITY OF DURHAM TRUST

Economy Team" (p. 6), makes no mention of a relief road scheme as pertaining to the relevant spatial options. At present, the interim SA report highlights possibilities and requirements for "sustainable transport and associated infrastructure" (130) in relation to spatial options a and b (i.e. Main Town, Sustainable Communities), and the infrastructure described is development in support of walking and cycling, as well as new GP surgeries and schools (p. 80,81,82, 95)). Also, "Pedestrians and cycling infrastructure should be developed alongside housing" (p. 92, concerning spatial options Main Town, Sustainable Communities). Since the Western Relief Road would form an "A road" of a kind with massive implications in terms of transport sustainability, one would have expected clear explicit reference to it in an appraisal of this kind. It would clearly call for full separate assessment as the iterative process of sustainability appraisal continues.

Despite the document's Interim designation, we consider that the limitations and omissions referred to above are of such significance that the document cannot provide a sufficient and robust Sustainability Appraisal for the proposals and options set out in the Council's Issues and Options consultation, and that a fuller review is required to establish an adequate and objective framework against which the sustainability of the County Plan can be assessed before it progresses to the next stage.