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Introduction (Page 6)

1. The draft strategy contains many proposals and ideas, some of them excellent, but we are concerned that the purpose and function of the document is not clear, leading to a lack of focus about how it will be implemented. The document as presented certainly falls far short of its description on the Council's consultation website, which refers to it as "an ambitious and positive strategy to improve the entire transport network across the city".

2. Our concerns both about the purpose of the document and about some of its contents are detailed against the relevant sections, but include the following key points.

3. Firstly, the links between the strategy, LTP3 and the Local Plan are unclear. It states that it "sits alongside and complements other plans and programmes" and "forms one part of the evidence base relating to transport". In some places the document appears to be a sub-plan of LTP3 focused on Durham, whilst in others it aims to map local policies across sectors such as locally for tourism and transport. Some of the content of this consultation draft might have been more accurately presented as the planned approach to delivering LTP3 in Durham, rather than as a new sustainable transport strategy. If the strategy seeks to indicate a new direction for transport delivery then it needs to be much clearer what consequential changes are proposed for LTP3, the Local Plan and other related policies so that the framework for local transport delivery is clearer and more consistent.

4. Secondly, to be worthy of the title a strategy must describe <u>how</u> policy goals will be translated into effective delivery. It is unclear how the goals for a wealthier, healthier safer and greener place are connected with the stated goal of the document to initiate a step change in the provision of sustainable transport in the City. In particular, the strategy appears to jump to a rather simplistic "car travel bad" "walk/cycle/bus good" assumption without proposing how, for example, the connection between less car travel and improved wealth can be delivered. Increased car travel and increased wealth are assumed by many people to be strongly correlated, so to make the opposite assumption in the introduction, without explaining a coherent strategy for managing wealth creation through lower car use, reveals the extent of the gap which the document fails to clarify or close.

5. Overall there appears to be a lack of focus on the transport mechanisms to be used to make Durham, wealthier, healthier, safer and greener. A strategy could be of high value by describing <u>how</u> travel needs can become consistent with wider aims. These might include elements such as wealth creation through faster, cheaper and more pleasant access to opportunities; action to restrict certain types of vehicle with higher emissions from places with poor air quality; or health improvement programmes for active travel targeted at people with inactive lifestyles. This has not been achieved.

Defining the vision and objectives (Page 8)

6. An effective strategy should seek to translate a clear vision of what is being sought into the definition of effective delivery programmes of appropriate scale and scope. However, the vision is missing, and the scale and scope of the delivery programmes are unclear.

7. The vision section currently interprets the future as a conflict between growing travel demand and the ambition for a thriving city – e.g. "The graphic above illustrates, to no particular scale, the problem facing Durham City over the period of the Sustainable Community Strategy to 2030" [page 8]. If the Council views conflict between aspirations for

growth and transport goals as a key challenge, then it should also explain how the proposed strategy seeks to resolve that conflict, but this has not been done. Not everyone construes the problem facing Durham in the same way. Wealth creation and reduced car use often go hand in hand – the local authority with the lowest level of car ownership in Britain is the London Borough of Westminster. Reduced, rather than increased, car travel demand is part of the vision for wealth creation in many of the world's wealthiest places. A similar vision for Durham would present a more confident vision than the current one that appears more focused on a continuation of the current tensions between growth and environmental protection.

8. To develop a clearer vision, scale and scope need to be clarified better than by a diagram of travel demand by mode "to no particular scale". The illustrative graphic indicates a fall in car traffic but it is not clear if this is actually what is intended. It seems completely at odds with the rest of the document, which talks about growing traffic levels. Presenting a vision for a fall in traffic could be a signal of an ambitious aim, but the aim would then need to be backed up with a practical and achievable strategy to deliver. This has not been done.

9. The objectives are much clearer than the vision, seeking to "….improve access to employment in Durham City….improve access to education, training and economic opportunity for young people in Durham City……improve the health of people living, working and studying in Durham City……improve the safety of people travelling around Durham City….enhance the built, historic, and natural environment of Durham City". A strategy should explain how these objectives will be delivered (e.g. securing reduced travel times or costs to reach work), but this has not been done. It is not at all clear what comprises success in improving accessibility, safety, health and place making. Instead the strategy appears to reflect the unclear vision, making some improvements for walkers, cyclists and buses, but with no clear view of how to tackle the underlying problems of access, health, safety and place making.

10. The inherited built environment has <u>unique assets and capacity constraints</u>, but the strategy fails to clarify how demand in each part of the City will be managed within these limits. The vision for growth includes adding new assets and expanding capacity, alongside making more of the existing assets. Identifying the key assets and capacities and explaining how they will be protected would bring a much needed focus to this section.

11. This lack of clarity about how a successful thriving Durham can be achieved undermines confidence that the overarching goal will be achieved. A key aspect of the transport strategy must be to recognise that delivery will continue to be funded largely by the travellers themselves, through direct and indirect purchases of transport; including cars, lorries, bikes and fares, the travel entitlements of employers, the investments of businesses and land development companies, and the delivery of services to manage journeys for people. The vision does not appear to recognise that less than 10% of the investment will come from public funds. An effective strategy must be capable of influencing all of the main funding streams, but the current vision of conflict between the aspirations for growth presents a confusing picture of travel demand, so is probably not a strategy the people of Durham can comprehend and get behind.

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Context for the strategy (pages 9 to 17)

12. The Issues and Opportunities report that informs the strategy is summarised in the context section and provides a useful summary of the problems experienced by travellers. This describes the challenges of better place making, the need for road space to be better managed, the lack of good door to door walking and cycling routes including road crossings for some of the busiest roads, the lack of measures to manage road traffic impacts, congestion at taxi ranks and many other related issues. However, reflecting the weakness of the strategy vision, the description of the context appears to be confused about scale and scope.

13. Some problems can be easily fixed at low cost. Others require more complex solutions. It is disappointing that the section setting out "The value of Investing in Sustainable Transport" reads more like a research report of transport improvements elsewhere, and is not translated to the context of Durham to explain the value locally. In order to develop a locally relevant strategy, the local mechanisms to create wealthier, safer, greener, healthier communities, need to be understood.

14. Considerations of scale and scope in the local context could help to reveal the opportunities for change. For example, traffic management programmes that reduce traffic on roads with 10,000 vehicles per day to less than 2,000 vehicles per day have a huge impact on the local environment, creating quiet pleasant streets from busy roads at relatively low cost. However, removing the same 8,000 vehicles from a road with 48,000 vehicles makes very little impact on what is still a very busy road. Many potential opportunities are likely to be missed as a result of the poor definition of scale and scope.

15. For the smarter choices programmes, it is because these are specific measurable and targeted (SMART) that they have been successful elsewhere. However, the document appears to be trying to persuade the reader that smarter choices are good in principle, rather than demonstrating how they could work in practice. Many of the measures being proposed in the strategy such as travel plans for employers have been promoted in Durham for nearly 20 years but this context is not explained. There may well be reasons why these have not been as successful as was hoped. It may be that barriers could be overcome by asking local organisations and employers what would meet their needs but there is no evidence that this has been followed through in the preparation of the strategy.

16. Similarly for cycling, if one of the reasons for the low level of cycling at present is a history of concern about cycling infrastructure, including safety at roundabout junctions, as suggested by the Durham bicycle users group, then understanding which specific improvements would enable new choices for which specific people would help to inform the strategy. A successful strategy can take a systematic approach to overcoming each barrier to more sustainable transport. CDT members have been involved with many of the past programmes so welcome the opportunity to contribute to future locally relevant transport strategies. For the purposes of this response to this consultation key points are:

16.1. The gaps in knowledge about the origins, destinations and trip purposes of travel leave a critical gap in the knowledge base for planning sustainable transport. The results of the origin and destination surveys undertaken in November 2015 and available to the Council in March 2016 were only published in late July 2016, too late

to permit systematic analysis when responding to this consultation.[1] Furthermore, the published report aggregates the analysis zones to a level that masks the observed trip patterns. It also covers a smaller area of the city than that considered by JMP. However, the Jacobs origin and destination analysis provides no support for the statements on pages 12-13 of the consultation document that "...baseline data from traffic modelling work (using 2015 surveys) reveals that 35-40% of all trips, varying by time period, are being made using vehicles that do not stop anywhere in the that only 55% of trips using Milburngate Bridge in the morning peak have an origin or destination in Durham City, which falls to 45% between the peaks, and to 39% in the evening peak". Instead, the Jacobs report states categorically at para 4.4.1 that "it is not possible to obtain information relating to the origin and destination of traffic at this destination." [I.e. Milburngate Bridge], and reinforces this statement in the following paragraph. The analysis of "through" traffic provided subsequently in section 4.5 is only at a highly aggregated level, but summarises this as at least 33%

16.2. Making the Origin & Destination results available at a more useful zoning level could help with the understanding of where travellers entering Durham were travelling, and the purpose of their trips. Releasing the model zone matrix described by Jacobs in their report would be more useful. A detailed analysis of the travel patterns does not appear to have been undertaken so far in the strategy development, other than for general comments about the proportion of by-passable traffic. The absence of such critical information, or even alternative sources from household travel surveys, shows that there is probably insufficient data available to prepare a realistic and achievable transport strategy for the City. Better data is needed.

16.3. Other evidence presented on pages 12 and 13 is also misleading. The statement in the strategy "The problem of peak hour traffic congestion is illustrated by the fact that over 47,000 cars cross Milburngate Bridge every day. Data collected in 2015 shows that congestion in the peak hours has grown since 2007 (particularly the morning peak)". The traffic flow data from the time series in the national statistics suggests a context, not of traffic volumes higher than they have ever been, but of a complex shifting pattern of demand, including a **reduction** in volumes crossing Milburngate Bridge since 2000.

16.4. Changes in the economy and society are creating both upward and downward pressures on travel demand and Durham appears to be no exception to the complex picture observed across the UK. Rather than the challenge of rising traffic levels presented in the draft strategy the picture revealed by the actual data is of normal levels of peak hour congestion and peak spreading as observed in towns and cities across the country. If local counts are different from the national statistics then some discussion of the differences is needed.

16.5. Greater road capacity does not necessarily lead to greater accessibility or safety, a reality that some people find counter-intuitive. Sometimes reducing road capacity can improve accessibility by helping to prioritise the trips most important for access, relative to the trips that are inconsistent with the delivery of policies for better access. When road capacity changes, travellers switch routes, time-of-day, mode, and

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1 Jacobs, *Durham City model rebase: review of 2015 key traffic date & key trends analysis* (July 2016). Accessed via
http://www.durham.gov.uk/media/10557/Durham-City-Traffic-Survey/pdf/DurhamCityTrafficSurvey.pdf

destination to take advantage of the changes. As these behavioural responses are hard to predict, they are invariably predicted with a substantial margin for error. This means that the benefits of new roads are nearly always over-estimated, since any new capacity induces new travel demand. The current levels of peak hour congestion over the River Wear in Durham may well continue to be largely self-regulating at a level where the delays are appropriate for the journeys being made. Planned approaches to deliver the objectives of the transport strategy for better accessibility, safety, health and place making, including travel across the River Wear, would be much more fruitful than setting plans for change in the context in uncertain travel demand forecasts. This means managing specified journey time, cost, safety and other objectives through an effective strategy. With little context about the current times, costs, health, safety and other aims, and little data about cross-river travel patterns, there is an insufficient evidence base to develop a strategy consistent with the Council objectives.

16.6. The 36% of people who walk to work reflects the availability of a good walking environment in parts of Durham, but poor road crossings, narrow footpaths, and other problems will all be contributing towards levels of walking well below the levels of 55% and over being achieved in some of the world's wealthiest cities. It could be easier to add 20% to the mode share for walking in Durham than to add 5% to the proportion of trips by cycling. Again the lack of information about trip origins, destinations and trip purposes means that the strategy development process lacks the information it requires.

17. The national and international context is also changing. Petrol and diesel cars are already being phased out in some countries (for example, they will be banned from sale in Norway from 2020) so these changes need to be factored into a 15 year strategy. Durham has already trialled an electric bus route, so the learning points from this and the strategy for expanding such services need to be explored in more detail. Perhaps of greater significance are the major changes in technology and lifestyles that are leading to very different travel behaviour from past trends. The relevance of this fast changing wider context for Durham is missing. This fatally harms the ability of the strategy to tap into these new opportunities.

18. Overall, the context chapter of the draft strategy is a useful summary of the Issues and Opportunities section but it fails to frame the views of local people within the data about travel that the Council has chosen to release. As such, the strategy is unable to build an evidence based approach to deliver the Council's objectives.

19. Revisiting the available evidence is strongly recommended in order to bring forward a robustly developed strategy. Transport North East publish current journey times in real time including those for a number of routes into Durham City, and the differences between statistics and forecasts needs to be explained rather than ignored. By collating the baseline data about actual journey times, together with evidence about observed travel patterns and travel demand, practical strategies could then be developed to maintain or improve journey times, costs and safety consistent with aspirations for a greener, healthier place. A clear evidence base would also provide the confidence for residents and businesses to invest in sustainable land uses and transport approaches.

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The Strategy (Pages 18 to 22)

20. In the absence of robust evidence about travel patterns, or about how the changing local and national context is affecting travel in Durham, the strategy is unsurprisingly more of a compendium of programmes that work elsewhere than a structured approach to deliver the improvements needed locally.

21. Key themes are: creating and managing space, encouraging smarter choices, managing demand, and taking opportunities from new land use development. These are all sensible approaches reflecting good international practice. Across the world the most sustainable cities have: created space by putting car parks and even key roads underground (as, for example, in Oslo); allocated the most attractive space above ground to walkers and cyclists; managed demand through appropriate allocation of space, pricing and other interventions; and promoted smarter travel through attractive personalised services. There is therefore much to commend the general approach to the strategy.

22. However, the detail of how these approaches might be applied does not match up to the concepts. The additional road space envisaged is not for sustaining the heart of Durham, but instead could weaken the city through adding roads on the periphery, while no workable car parking strategy is identified. The opportunities from land use development will only be achieved with stronger standards for roads, transport, parking and accessibility, but the strategy only "recommends" changes rather than committing the Council to making improvements. In the absence of effective hard measures for sustainable transport, unrealistic expectations of smarter choices approaches are made: *viz* "In the short term, this means that promoting and influencing changes in travel behaviour will be one of the principal tools that manage the demand for car travel". Smarter choices programmes are most effective when promotion and provision are delivered in parallel, so delivery in isolation in the short term (if funding can be found from others, as the Council is not proposing a significant re-prioritisation of its own resources to this) could represent poor value.

23. On page 22 there is a particularly illogical statement that "this strategy proposes that additional space is constructed to enable the removal of some of the traffic from the city centre". Additional space, which presumably is referring to peripheral roads, could either increase or decrease levels of traffic in the city centre. Measures to increase or decrease traffic in the city centre could be implemented with or without peripheral roads. These are well established transport planning principles which any competent strategy should recognise.

24. On page 19 it is stated that "evidence from recent traffic surveys (2015) suggests that around 35-40% of traffic passing through the city has no destination locally, and therefore an alternative route, ostensibly to enable these trips to cross the River Wear, needs to be provided." We have already questioned the accuracy of this statement above, and it is of concern that the data about travel patterns made available to JMP for preparing the strategy has not been shared more widely. To identify successful solutions to reduce traffic in the city centre, a variety of alternative route options between each origin and destination need to be analysed but no evidence of this has been presented. CDT has previously highlighted concerns about the transport modelling assumptions used by the Council and no new analysis has been presented to support the bald statement "therefore an alternative

route, ostensibly to enable these trips to cross the River Wear, needs to be provided". This needs to be revisited to develop a coherent workable strategy.

Smarter Choices Strategy (Pages 23 to 30)

25.   Without a clear evidence base about the current effectiveness of smarter choices programmes, this part of the strategy lacks specifics. It reads more like a consultancy report recommending a potential programme rather than an actual strategy to deliver: "We therefore recommend that in the short-term Durham County Council delivers a targeted programme of proven smarter choices measures".

26.   The bulk of this section of the strategy could have been written for anywhere in the country and there is very little customisation to the specific opportunities available in Durham. Where there are specific references to the local context there is no detail about the scope for particular interventions to succeed to help guide the planning of each intervention e.g. "there is an embryonic partnership developing informally to discuss and take forward the coherent development of employer travel plans in Durham City". Some detail about the numbers of staff involved, the proportion of them currently making less than optimal travel choices, and the scope for this to be changed through different types of intervention, would be the sort of detail that would enable a smarter choices strategy to add value and focus delivery.

27.   There is a specific proposal to brand the smarter choices delivery under the Tyne and Wear Go Smarter brand which raises questions about the purpose and recommendations of this document for a separate local smarter choices strategy; "Whilst South Durham has benefited from the Local Motion LSTF programme over the last few years, we would recommend that Durham City aligns its programme branding with the Go Smarter programme in Tyne and Wear, given the inclusion of County Durham in NECA and the strong transport links between Durham City and Tyne and Wear. This will help to build integration with NECA and grow awareness of the Go Smarter brand, rather than creating an additional new 'competitive' brand." However, a separate specific recommendation is for a "local multi-modal journey planner that enables people to investigate travel options for specific journeys and to compare different travel options (including the car)", despite such services being already widely available under regional, national and internationally branded products. If the purpose of the smarter choices strategy is to clarify how a coherent approach to delivery can be achieved, then this has not been achieved, with a confused picture of national, regional and local interventions being mentioned without any clear strategy to co-ordinate them. This section of the strategy remains a set of general consultancy recommendations for how a potential programme might be developed, but the strategy development itself still needs to be undertaken.

Infrastructure Strategy (Pages 31 to 44)

28.   The infrastructure strategy benefits from the previous consultation inputs with many detailed proposals for infrastructure improvements complementing changes which are already underway. Collectively these could substantially improve transport, but it would be helpful to separate the strategy from the planning. The strategy should clarify how policies will be put into practice. Figure 1 on page 33 is titled "City Centre Short Term Strategy" but instead it shows the city centre short term plans. In many places such as this the element that is missing from the document is the strategy.

29. For example, the investment in the SCOOT system, including the signalisation of Gilesgate and Leazes Bowl Roundabouts, could significantly reduce emissions in the city centre and improve air quality if it is managed in that way. By minimising the volume of standing traffic in the central area, including on Milburngate Bridge, the traffic management could also enable more space on road links for bus priority and cyclists. It is currently the capacity of the junctions rather than the links that constrains the road system capacity, so the new SCOOT system could potentially be used to minimise standing traffic in the most sensitive locations. However, although the draft strategy mentions the policy aims for reduced emissions, and describes the plans for the SCOOT system, it largely fails to explain how the two will be connected. Queues could be managed in many different ways to maximise road capacity, reduce emissions or prioritise particular routes, so the strategy needs to be explained so that it can be planned.

30. The document provides some clarification on page 35 in relation to the proposal for the Northern Relief Road: "A fundamental caveat in the inclusion of this additional road space to the north of the city, to enable the removal of east-west through traffic from central Durham, is that it should only be provided to enable significant re-allocation of road space to pedestrians, cyclists, and buses within the city centre". Since there are many ways of re-allocating road space to pedestrians, cyclists and buses in the city centre (including alternative approaches to traffic and queue management) this condition suggests that JMP believe that "fundamentally" there is no case for the Northern Relief Road.

31. The document acknowledges that the current walking and cycling infrastructure leaves many gaps where people face difficulties crossing roads, or with sections of narrow path, poor maintenance or other problems. However, while there are some plans for new walking and cycling routes there is only limited clarity about how the strategy will ensure that the missing links mentioned on pages 41 and 43 have been correctly identified and tackled. A clear strategy for investing in the network would help, particularly with the availability of national funding to support investment in door to door walking and cycling opportunities.

32. It is beyond the scope of this response to discuss every detailed change being proposed. Many of the individual proposals will be helpful, but the following more detailed observations may be useful:

  32.1. An infrastructure strategy for cycling needs to be articulated more clearly rather than only listing various aspirations for improvements. A strategy could be based on a network of connecting city centre routes, including access to the railway station and the University first, and then take each sector of the city in turn to upgrade a main route. Sectors could include: from Gilesgate Moor down Claypath into the city centre and over Baths Bridge towards the University and from North End and Aykley Heads into town across the A690 near the bus station. Completing whole routes would be far more effective than scattering improvements on incomplete routes across the city.

  32.2. The infrastructure strategy for walking needs to be developed more clearly. Routes need to be continuous including ensuring suitability for people in wheelchairs and parents with children. If cars need to travel at the pace of pedestrians for short sections, then this is a good demonstration of the theory set out in the strategy of pedestrians receiving top priority.

32.3. The strategy would be enhanced by a clear description of how each route will be audited to ensure safe walking and cycling routes are available for everyone. Ideally these should refer to design documents showing examples of good practice paths, crossings and other facilities.

32.4. On page 46 it is stated that "A wider rollout of Advance Stops *[sic]* Lines at existing signalised junctions should be considered where space permits". Surely ASLs should be prioritised where there is a need and benefit from providing them. ASLs are often of particular benefit where space is tight as that is when cyclists need protection most. Full segregation at junctions is preferred over ASLs in the latest UK design guidance (TfL and Active Travel (Wales) Act).

32.5. It would be helpful to have greater clarity about how and where pedestrian priority will be determined. For example, zebra crossings give the greatest priority to pedestrians but are not suitable in locations with high conflicting pedestrian and vehicle flows.

32.6. Similarly, for cycles at junctions it would be helpful to describe the strategy for ensuring that safety is ensured across the network. Roundabouts with higher levels of traffic should generally have segregated cycle facilities. The Durham bicycle users group has many good ideas for segregated facilities at junctions which can be found in their submission to the Council of 22 May 2015 in response to the Gilesgate and Leazes Bowl roundabout consultation.

32.7. There are no proposals for closing roads, or restricting flows to one direction only, but this can be a highly effective way to help reduce the number of junctions to make traffic flow more smoothly.

33. Overall, the strategy should define the step by step approach to deliver the Council's policy goals. Much more detail is needed of how the programmes will be managed, the performance goals specified, the standards to be achieved, and the investment strategy, and probably a lot less detail about individual schemes which is best left to the action planning stage when funding, design and implementation can be planned together.

City-wide supporting measures (Pages 45 to 49)

34. Many of the comments in relation to the city wide issues are covered in the comments on the smarter choices and infrastructure strategies but additional points are that:

34.1. A close look at travel patterns will allow an environmental traffic management programme to be identified which maximises the number of quiet streets.

34.2. Much smarter management of taxi ranks should be possible. Taxis waiting in key locations can be managed by restricting ranks to the minimum needed to serve peak supply without delays, particularly on North Road where the length of the taxi rank detracts from the shopping environment and presents an obstacle to the provision of a north-bound cycle lane. The Council should also consider emulating the practice of cities such as Brighton and Glasgow by making it a condition of taxi licensing that a central booking number is available to reduce the quantum of on-street hires.

34.3. A greener bus strategy is needed. Although Durham has a relatively new bus fleet, a strategy is needed for lower emission vehicles over the next 15 years. The proposal in

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page 48 to encourage bus operators to adopt lower emission vehicles lacks any clarity about proposed policy instruments.

34.4. The parking strategy needs further work as this is a key part of any sustainable transport strategy. It is far from clear how the current proposals would work: "Controlling the demand for car travel can be sustained in the long term by reducing the supply and increasing the price of car parking at appropriate employment locations." (page 19) Meaningful supply constraints could only be effective if the ample on-street parking close to the city centre is also managed to ensure it is not used by workers who have been "priced out" of their employer's car park.

34.5. The viability of new development can be strongly enhanced by reducing the requirement for parking, and linking this with an effective public transport investment strategy. Such approaches can help to make business more competitive and sustainable transport more viable yet there is no strategy for achieving any practical measures. The strategy should identify a workable business model for achieving such benefits, perhaps by developing the general concept introduced on page 24 with more widespread use of personal travel accounts.

34.6. The Council's Parking and Accessibility Guidelines (2014) need to be revised to support the strategy, as noted on page 21, and to reconcile the two conflicting definitions of the town centre area which apply to residential and non-residential developments. Car-free developments should be encouraged in areas of the city subject to residential parking zones.

34.7. Public bike hire, particularly outside the largest cities, has been one of the most difficult types of infrastructure project to sustain across Europe over the last decade, so if the proposal for this on page 46 is to be pursued then it needs to be backed up by a viable business model.

34.8. The investment strategy is poorly developed. The strategy should ideally identify the main sources of investment in transport and seek to bend these funding streams so that the strategy becomes affordable. On page 49 the potential for developer funding is acknowledged but this is only one potential revenue stream. The proposals in the strategy to rely on central government support (e.g. from walking, cycling and accessibility funding) or for capital grants towards infrastructure projects do not seem to be a very sustainable approach. All towns and cities with highly successful transport strategies channel revenue streams from fares and charges into investment.

Monitoring and Evaluation (Pages 50 to 53)

35. This response has highlighted the inadequacy of the evidence base presented for the strategy. Only when evidence about travel patterns and the potential for change has been assessed can a relevant local monitoring and evaluation strategy be developed.

36. Particularly for the smarter choices measures, attempting to replicate levels of travel demand changes achieved in one place from those achieved in another is not particularly informative. These measures are most effective when they have been effectively targeted, and the monitoring and evaluation should reflect the targets from the design rather than seeking to measure undefined aims.

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Concluding comments

37. Overall this is a competent review of possibilities and prospects for transport in Durham. However, it is a research and consultancy report, not a strategy. It fails to meet the key test of any strategy to explain how policy goals will be secured. It is also not sustainable as it does not explain how it will be implemented, funded and ultimately sustained.

38. Consequently, the Trust does not consider that the document represents an appropriate and effective strategy for the delivery of sustainable transport in Durham City, nor that it can be accepted in its present form as providing a relevant contribution to the development of the new County Durham Plan.