

THE CITY OF DURHAM TRUST

Response to the Durham City Integrated Transport Approach

Durham City Integrated Transport Approach (DITA)

Introduction

1. This letter provides the response of the City of Durham Trust to the above consultation paper issued by the County Council. Although the document is headed “The County Durham Plan”, it appears to be following a different consultation format from the Plan itself, and our response is therefore made separately. Nevertheless, many elements of the Trust’s response to the Pre-Submission Draft of the County Plan as it refers to the Durham City area are relevant to DITA, notably our responses on the core policies 1-14, and on policies 25 and 48-50, together with our response to the Durham City Masterplan. These responses should therefore be taken together with this letter as constituting our comments on, and objections to, the content of the DITA. They form our reply to the sole consultation question that the document asks, Question 1 on page 53: “Do you have any comments on the detail of the Durham City Integrated Transport Approach?” Apart from this paragraph and the three further introductory paragraphs below, our response follows the numbered section structure of the Council’s document.
2. The general concept of an Integrated Transport Approach for the city, and indeed for the wider county, is one that the Trust supports. However, the current relevance of this document appears questionable, in view of the fact that statutory consultation on the proposed Joint Authority for the north east (in which the Council would be a partner) is now taking place. Since one of the functions that it is proposed should transfer to the new authority is transport and the development of a joint Local Transport Plan, it is difficult to understand why the Council has initiated this particular consultation at the present stage.
3. As noted, the Trust supports the general concept of an Integrated Transport Approach. Unfortunately, this document from the Council does not articulate the integrated “vision” for its delivery that is promised in paragraph 1.2, and appears to provide a less convincing and coherent basis for such a policy than the Council’s existing Local Transport Plan 3. While the Executive Summary refers on page 2 to “breaking the dominance of the private car”, the rest of the analysis seems to accept uncritically and indeed to reinforce a view of the car’s supremacy in a transport hierarchy, and considers none of the policy tools that are available to

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intervene immediately in reducing the attraction of car use. Even the limited congestion charging system that is already in place in the Peninsula is only mentioned once, and that within the context of making the city centre more pedestrian friendly rather than as a traffic reduction measure per se.

4. Nor does the document develop the concept of transport integration at anything other than a superficial level. Although it refers on page 2 to “reducing the need to travel” in the context of the city spatial strategy, the promised discussion in Section 2 simply amounts to an uncritical apologia for the Green Belt releases which form the current, and highly-contested, core of the Draft Local Plan. It lacks the depth of understanding of the causal interaction between spatial policies and transport demand that is shown in LTP3. And at a more basic level, a key component of most successful urban transport integration schemes, better inter-modal ticketing, is not even mentioned as an aspiration, nor is the existing limited PlusBus add-on to rail tickets to or from Durham referred to. Consequently, the document does not actually fulfil the expectations that are raised by its title. Instead, it serves to demonstrate how far Durham is behind the good practice that is shown in comparable cities such as York and Oxford, which have combined active traffic restraint policies with improved public transport. It even lags behind the local comparator of Darlington, which succeeded in achieving a 17% reduction in car use.

Section 1

5. Paragraph 1.3 correctly quotes the requirement of NPPF, paragraph 29, that “the transport system needs to be balanced **in favour** of sustainable transport modes, giving people a **real choice** in how they travel”. [Emphasis added.] But the rest of this sub-section provides no evidence of how the Council proposes to achieve this rebalancing **in favour of sustainable transport**, and instead simply describes palliatives which do not address the underlying purpose of the NPPF guidance.
6. North Road and the bus station are mentioned at paragraph 1.6, but this response comments on this issue under Section 3.
7. Paragraphs 1.8-10 purport to discuss mode share in Durham City, but show the same defects as the Pre-Submission Draft in being imprecise as to the basis of the statistics that are used. The mode-share number of trips *entering* the city is not necessarily the same as trips *within* the city, and paragraph 1.11 likewise fails to explain adequately how the figures for through trips interact with the numbers given in that paragraph, paragraph 1.9, and figure 1. An informed discussion of the scope for modal change in the city first requires the disentangling

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of these issues, and then, noting the strong baseline of active travel within the city (paragraph 1.10), establishing the policy interventions needed to achieve the desired outcomes. As simple a measure as ramp metering at Junction 62 or at the Gilesgate roundabout could significantly reduce through car journeys via the city centre.

8. Paragraphs 1.12-15 are entirely uncritical in accepting the “inevitability” of “natural traffic growth” and in promoting unsubstantiated claims about the congestion and potential instability of the city’s road network. In its response to Policy 9 of the Pre-Submission Draft, the Trust has pointed out that DfT traffic count statistics show that traffic volumes on the A167 at Crossgate Moor are now **lower than they were in 2000**, and that the peak occurred in 2004, well before the onset of the economic downturn. This is consistent with recent evidence questioning the “inevitability” of traffic growth.¹
9. Likewise, the regular DfT statistics of traffic congestion on local road networks show that average peak hour speeds and journey times on the County Durham A road network (including the principal roads through and round the city) are significantly better than the regional and national average, a position that is confirmed by the detailed traffic modelling undertaken by Jacobs for the County Council.
10. While paragraph 1.16 asserts that there is a “clear need” for highway improvements in the city area regardless of additional housing and employment development proposed in the County Plan, that is not the basis of the proposition in the Pre-Submission Draft. That links the need for the Western Relief Road directly with the Green Belt releases that the Council intends would fund them, and concludes that the Northern Relief Road should be deferred until towards the end of the plan period in 2030.

Section 2 – reducing the need to travel

11. Paragraph 2.2 asserts that Durham City is the most “sustainable” location for new housing and employment in the county, an assertion which is immediately qualified by footnote vii, which acknowledges that “Durham City scored top **alongside Bishop Auckland**”! The Trust’s response to the Pre-Submission Draft points out that the city has a much higher level of employment than Bishop Auckland, so it is difficult to see how it is more “sustainable” for unemployed people in Bishop Auckland (or other towns such as Crook or Consett) to make a round trip of 20 or more miles daily to commute to work in Durham. The remainder of the

1 See, for example, the recent discussion in <http://www.parliament.uk/documents/commons-committees/transport/POST%20briefing%20on%20peak%20car.pdf>

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analysis in paragraphs 2.2-2.9 is equally ill-founded, and at times seems irrelevant. It is difficult to see the significance of the Great North Cycle Way to shopping, housing and employment in Durham, while the underlying logic of paragraph 2.6 seems to be that the rest of the county should be shut down in the interests of sustainability.

12. Paragraphs 2.10-13 are equally unsound in the way that they misrepresent the evidence. The so-called “testing” of the Spatial Strategy carried out by Jacobs changed only one parameter – the location of **housing** in the plan. By retaining **employment** on the Council’s preferred out-of-centre site at Aykley Heads, the modelling not surprisingly generated longer trips from more dispersed housing. The “testing” failed to examine the alternative put forward by the Trust and other objectors to the County Plan, that of dispersing employment as well as housing to other areas, and in particular to those parts of the county which are suffering most from unemployment.
13. Paragraph 2.14 likewise presents evidence selectively and out of context. The growth referred to is growth in all trips – not simply car-borne journeys. In reality, the forecast traffic growth arising from of the Plan would be only around 1% of all vehicle trips on the local network – an increase of perhaps 20 peak-hour vehicles on the A167. Furthermore, the growth targets in the Plan depend on Council employment forecasts which are derived from faulty calculations.
14. The proposition in paragraphs 2.15-2.28 that the Strategic Development sites will “**reduce**” the need to travel by private car is equally flawed. Firstly, the Council’s own traffic consultants have shown that the implementation of the Plan and the associated relief roads will of itself **increase** total car traffic in the city area. Secondly, the assertions within the paragraphs about individual sites are not supported by the evidence. Aykley Heads is **not** within “walking distance” of the city centre, certainly in terms of CIHT guidance, which recommends the 400 metre pedestrian access distances cited in paragraph 3.72 of DITA. It may be marginally closer to the railway station than some city centre sites, but it is further away from the A1(M) and therefore from road access to Newcastle and Tees Valley airports than the city centre itself. As discussed under Section 3, there is no bus access to the interior of the site, and it is located inconveniently far from the bus station where most routes from the east, south and south west of the county terminate. It simply does not have the “great” transport links claimed in paragraph 2.19, and is likely to generate more car-borne than sustainable commuting, as is suggested by the occupancy of the existing County Hall car part.
15. The document also makes frequent reference to the Council’s Park & Ride bus services, both in this section and elsewhere. If the intention is that they should develop into a local transport service for general passengers as well as park-and-ride customers the Council would be

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advised to check the compatibility of this proposal with the current legislation governing subsidised bus operations. The operators of parallel commercial bus routes could well object to this dilution of their revenue base.

Section 3 – alternatives to the private car

16. The Trust welcomes the Council's belated adoption of the "LocalMotion" concept already successfully developed around the Darlington area, but finds it disappointing that it does not consider this to be a priority for mainstream funding. The other provisions discussed in paragraphs 3.3-13 are basic elements of good practice, and some are required by planning legislation.
17. Likewise the Trust supports measures to promote walking and cycling, but is concerned at the proposed extension of shared use. The Council has totally failed to ensure that the basic safety requirements of its existing shared-use provision are enforced: for example, at the A690/A691 junction, cyclists using the footway alongside the Passport Office are required to dismount. This rarely happens, despite the dangerously narrow extent of the shared pavement; instead, many cyclists take advantage of the downward gradients on the A690 or on the footway down from Claypath to accelerate to speeds which place pedestrians at significant risk. Lack of enforcement simply encourages cyclists to extend their use of footways to those which are not designated for shared use, and further undermines pedestrian safety and amenity. In making future provision for cyclists the Council should do this by converting road space, rather than by reducing pedestrian facilities.
18. While the Trust also welcomes some of the document's proposals for improving bus provision (though strongly deploring the cuts in the Council's financial support for bus services which have significantly reduced residents' transport choices), it continues to strongly oppose the Council's proposals for Durham Bus Station, which will undermine the bus accessibility of city centre shopping and other facilities, introduce new traffic hazards for bus passengers who would have to access bus stops on both sides of the A690, and significantly degrade the streetscape of part of the Conservation Area and a main gateway to the city. Our concerns can be summarised as follows:
 - By rezoning the entire bus station as part of the proposed retail allocation without making any committed provision for its equivalent replacement, the Council's strategy risks undermining one of the important factors that could contribute to improving North Road's commercial performance: its

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ready access by public transport from the whole of the surrounding area². The Council continues to propose relocating bus facilities around the site of the A690 roundabout, and the map on page 127 of the 2012 *Preferred options Appendices* volume extended the zoning to include the soft and hard landscaping along the A690 on both sides of the roundabout, taking in the roundabout itself.

- The reality is that these areas, even with the inclusion of the Hopper House site, could not provide an effective substitute for the present bus station. The bus station is well integrated into the topography on the southern side of North Road while being largely screened from the street itself by its frontage. Its operational area provides eleven boarding stands and two further setting-down stands, together with designated parking bays for four buses. At peak times it is also necessary for parts of the entrance and exit roads to be used as holding space for buses, and Sutton Street is also used for this purpose. For large parts of the day all stand are in use, with some being reoccupied at 5-10 minute intervals. Although the bus station could benefit from improvements to the layout and management of the passenger waiting facilities, the operational area is probably optimal for the throughput of services which it is required to handle, and its overall layout facilitates easy passenger interchange between bus routes. It is also close enough to the railway station for reasonable inter-modal connections on foot, and a direct link between bus and rail stations is provided by the Cathedral bus service
- No other single space within the designated North Road redevelopment area could accommodate the existing functions of the bus station, and on-street provision is not a feasible or acceptable substitute. Modern buses are around 11-12 metres in length, and a ready appreciation of the amount of frontage that would be required to replace the saw-tooth layout of the eleven existing main stands is provided by the two on-street stands on the opposite side of North Road. The kerb-side space required for these two stands is not far short of the length of the street frontage of the entire bus station, while the damage to the road surface and the interruption to pedestrian flow caused by on-street bus activities at these stances is also readily apparent. A similar effect has now resulted from the transfer of the taxi rank to the south side of the main length of North Road.
- To move existing stands within the bus station to other lateral frontages in North Road and along the roundabout approaches would probably take up all of the available kerb space. Such a layout would significantly detract from the appearance and amenity of the whole of the North Road area, and would be significantly less efficient both for bus operators and for users. Passengers would no longer be able to interchange quickly and safely within a compact and dedicated area and would not have the shelter from the elements and the other facilities which the present bus station provides.
- Concentrating bus operations around the present A690 roundabout, even if it were feasible, would also detract significantly from the landscaping of this area, which softens the intrusion caused by the inner relief road and complements the way in which the railway viaduct frames the views in both

2 A survey carried out by the Council's consultants found that a higher proportion of shoppers in the central area of Durham arrived by bus than at other comparable centres in the county. See GVA Grimley, *Durham County Council: retail and town centre uses study* (2009), Vol 2, para 3.101.

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directions along North Road. Any loss or reduction of the soft landscaping (including the now-mature planting on the roundabout itself and alongside St Godric's Road) would be a serious diminution in the quality of the existing streetscape, while the extension of hard landscaping to create on-street bus stances and layover area would create swathes of sterile and unwelcoming space at this key entrance to the city, and would be inconsistent with its Conservation Area status.

- Changes to the layout of the existing roundabout and the traffic management on its approaches to accommodate new bus stops would also add to the severance which is currently created by the A690. Signalisation of the junctions will reduce, rather than increase, the opportunity for pedestrian movement, which will increase significantly if buses pick up and set down on the north side of the layout.
- In terms of commercial development requirements, no evidential justification for converting the bus station to retail uses has been provided. The latest GVA advice to the Council does not provide any evidence to support the need for additional non-food retail on this scale, but rather argues the contrary, by stating that

The quantitative capacity assessment identifies no immediate need for the Council to proactively plan for new comparison provision in the city centre in the early phase of the emerging Local Plan (i.e. to 2018). There are modern vacant units within the city centre primary shopping areas which would meet any short term needs or indeed commercial demand for representation in the city in the first instance.³

Instead, as already mentioned, GVA identifies improvements to the existing provision at The Gates as a priority.⁴

- The Council's own site selection report dismisses North Road as not providing a sufficiently large site to address the city centre's identified deficiency in food retailing space.⁵ Since all of the existing street frontage of the bus station apart from the pedestrian access and the bus exit space is already dedicated to retail use, it is hard to understand the basis of the claim in paragraph 6.31 of the Pre-Submission Draft that relocation of the bus station is necessary for its site to be utilised for retail frontage. In view of the current number of voids in The Gates shopping centre and in North Road itself, and the advice from GVA already quoted, there is no commercial evidence of any pressing requirement for adding to the current supply of retail sites in the area at the cost of relocating the existing convenient and effective bus facilities. Indeed, redevelopment on the scale that the Council appears to propose could well displace specialist small businesses that are trading successfully on

3 GVA, *Durham County Council: retail and town centre uses study: quantitative retail study update*, April 2013, para 12.37.

4 *Ibid*, para 12.12.

5 Durham County Council, *The County Durham Plan: Retail Site Assessment Selection Paper* (2012), paras 3.11; 3.25.

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North Road and which provide valued services that contribute to the entirety of the city centre retail offer.

19. The document also refers in paragraph 3.51 to volumes of “up to 80 buses per hour” in North Road. This may be a conflation of total movements at the northern end of the street and the one-way movements towards Milburngate, but the paragraph appears to overstate the adverse effects. Buses are driven by full-time professional drivers who understand the limitations of operating in a largely pedestrianized environment and maintain an appropriate speed in North Road. The same cannot always be said of other drivers, while the recent transfer of the taxi rank to the eastern side of North Road has done far more damage to the amenity of North Road than the long-established bus movements along the street.
20. There are also more obvious ways of improving interchange between the bus and railway stations than by removing the bus station to a busy through road which will continue to constitute a significant obstacle to safe pedestrian movement. The two existing footbridges over the A690 are both sub-optimally located for convenient pedestrian transfer between the railway station and North Road: restoring the direct route between Tenter Terrace and the station approach which was destroyed by the realignment of the A690 would significantly improve the pedestrian accessibility of the railway station from North Road and the bus station.
21. Paragraphs 3.59-73 offer proposals for future bus provision to serve the strategic development sites. The Trust of course continues to oppose the development of these sites, but the proposals set out in this part of the document do nothing to resolve the inaccessibility of large parts of these sites to existing bus stops and routes, nor the tensions between the needs of through passengers and local access that would be caused by diverting established routes to improve site penetration. Paragraph 3.65 notes the financial and service integrity risks that would result from overlaying new dedicated local services to meet the needs of development areas.
22. The Trust believes that the issue of managing taxi and private hire vehicles requires more attention than is given in the discussion in paragraphs 3.74.
23. In general terms the Trust welcomes the proposals in DITA for securing and improving rail services for passenger and freight routes. The Council should not, however, underestimate the potential risk to Durham’s relative rail accessibility that is posed by some of the potential developments that the document discusses, particularly HS2 and the pressures this could bring for non-stopping high speed services on the northern part of the east coast main line.

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Section 4 –managing traffic

24. The attitude described in paragraph 4.1 simply reinforces the problems associated with road traffic rather than seeking actively to reduce them. As in other parts of the document, it offers costly palliatives without seriously exploring options for traffic reduction. The Trust is particularly concerned that UTC techniques should not be applied in a way which reduces existing crossing times and intervals for pedestrians. Giving priority to pedestrian movements in the compact urban form of the city is essential for improving its pedestrian-friendliness for both residents and visitors alike, and for reducing the dominance of the car by promoting walking as a safe and convenient alternative.
25. Likewise better parking management is essential for improving pedestrian safety and amenity as well as that of road vehicle movements. There is an increasing tendency for motorists to park or indeed drive partly or wholly on footways, and the Council needs to address this issue as a matter of considerable urgency. Its regulation of on-street parking should also recognise the increased length and height of cars, which increases the pressure on kerbside space and also makes pedestrian movement more hazardous because of the way that their sightlines are reduced by the greater visual obstruction now caused by parked cars.
26. As already made clear, the Trust does not accept either the traffic or the development case for building relief roads close to the city. The by-passing of the city, firstly by the realigned A1 (now the A167) and the motorway, has in the long term done nothing to resolve traffic issues within Durham, and has instead contributed to urban sprawl. The substantial levels of investment in new highways across the whole of the north east since the 1960s have likewise not contributed to an improvement in the region's relative economic performance.
27. The Trust agrees, however, that more limited road improvements may be appropriate in particular situations to relieve localised environmental problems. These should be undertaken, however, in a wider context which includes a more genuine commitment to traffic reduction and the promotion of sustainable planning and travel alternatives than is exhibited in the current DITA document.

Section 5 – conclusions

28. The Trust does not accept the premise in paragraph 5.1 that “traffic growth in Durham City is inevitable”. Durham is a small and compact city which is ideally suited to the promotion of sustainable travel, and indeed the document notes the prevalence of walking among the student population. It is important that the city's strong potential for re-balancing its transport system in favour of sustainable modes, as NPPF requires, is not compromised either by unambitious and ineffective Council transport policies, or by the encouragement of urban sprawl on to peripheral sites.