

Question 10

Policy 8 - Western Relief Road

1. The City of Durham Trust remains completely opposed to the Council’s proposal for a Western Relief Road for the City. Its effects would be contrary to the Council’s own transport policies and sustainability objectives, and the scheme would have very damaging effects on the environment and setting of the City, both by encouraging road traffic growth and through its direct impact on the Green Belt. The arguments put forward in its favour on pages 68-73 of the *Preferred Options* document are highly selective and even tendentious in their use of evidence, their representation of the policy context, and in their treatment of previous consultation responses.
2. The manner in which this proposal and that for the Northern Relief Road has been brought forward is also contrary to Department for Transport and Treasury Green Book advice on good practice: there is no demonstration that other options have been properly considered and tested as alternatives to these highly-divisive schemes. This is also in breach of the requirement in Policy 5 of the Council’s current Local Transport Plan that “Proposals for improvements to the highway network will only be brought forward, in the absence of suitable alternatives, capable of achieving the same objectives”.¹
3. Although the *Preferred Options* document refers on pages 69-70 and 72 to options that were considered as part of the 2006/7 TIF modelling, these references present an extremely biased description and interpretation of the analysis that was carried out as part of the TIF work. The Council has chosen to ignore the clear evidence from the TIF study that traffic restraint measures, coupled with support for public transport, were shown to generate substantially positive net benefits,² and when this analysis was reworked to include highway building options the latter were shown to generate significantly lower net annual benefits than options involving a traffic restraint cordon and discounted bus fares.³
4. The fact that councillors subsequently made a decision on political grounds not to apply traffic restraint policies more widely does not justify the exclusion of such options from future evaluation processes, especially since the TIF analysis demonstrated their efficiency in both traffic management and net social benefit terms.
5. The Council’s determination to avoid proper evaluation of alternatives to its relief road proposals is further demonstrated by looking behind the statement on p 72 of the *Preferred Options* document, that “sustainable transport techniques were included in the 2011/12 modelling work, but a minimal impact on reducing future traffic levels” (sic). This appears to reference not only the extremely limited and selective use of the TIF evidence discussed above, but also the bizarre way in which its consultants have applied

1 Durham County Council, *Local transport plan 3: transport strategy*, p 76.

2 Jacobs, *Durham TIF study: Technical note DT 7* (2008), p 27.

3 *Ibid*, p 40.

the evidence from the Sustainable Towns demonstration project in Darlington. This local comparator achieved a 19% reduction in car-borne trips, but while in planning terms Jacobs' approach may have been prudent in assuming a more cautious reduction when testing the effects of applying a similar approach in Durham, no evidence to justify the selection of their preferred figure (10%) has been presented.

6. Moreover, the intention of such area-wide policies is completely contradicted by assuming that the approach would apply only in the new housing release sites proposed in the Council's Local Development Framework, and consequently by assigning a 10% traffic reduction only to the new traffic generated by these sites.⁴ While this sleight of hand allows Jacobs to claim, and the Council to repeat, that there would be only a minimal effect on future traffic growth if sustainable transport techniques were applied, the result that is described is in reality simply the outcome of testing only a minimal application of these techniques.
7. The claim in para 4.126 of the *Preferred Options* document that the Western Relief Road proposal is justified because it was accepted by independent inspectors in 1979 and 1993 (the latter in the face of opposition by the City of Durham Council) is spurious in the current context. Those public inquiries were based on the premise that the A167 was part of the trunk road network and served a national strategic transport function. The 1993 inquiry was also informed by the then policies of the Conservative government and the mistaken belief, set out in the white paper *Roads for prosperity*,⁵ that continued road investment was required to ensure economic growth. In the face of strongly hostile public reaction to proposals such as the Newbury by-pass, and the growing international awareness of environmental imperatives, the Conservative administration under John Major abandoned its ambitions for a substantial road building programme. Later transport white papers and guidance have given priority to alternative modes of transport and to making more effective use of existing road infrastructure through traffic management and through planning policies which reduced the need for travel.⁶ Indeed, analysis published in 1999 by a government body went so far as to suggest that, rather than encouraging investment, road building can actually harm local and regional economies.⁷
8. So far as the A167 is concerned, the changed policy background and better-informed professional understanding are clearly demonstrated by the fact that the Department of Transport did not proceed to implement the approval for the Western Relief Road that it

4 Jacobs, *Durham County Council Durham Local Development Framework (LDF): final report* (2012), pp 10-11.

5 Cm 693 (1989)

6 First systematically set out in *A new deal for transport*, Cm 3950 (1998), but the same approach underlies subsequent national transport policy documents.

7 <http://www.dft.gov.uk/topics/appraisal-evaluation/sactra>. It is also relevant to observe that the north east, and County Durham in particular, saw no shortage of new road investment from the Hailsham Plan of the 1960s onwards. However, this investment has not corrected the region's relative economic underperformance.

received in 1993. This was followed by the Highways Agency's decision to exclude the A167 through Durham from the core network of nationally-strategic routes, and its detrunking in 2003 because it was considered to be a road which primarily served local, rather than national, needs. Consequently the strategic arguments which were adduced at the 1993 public inquiry no longer have any relevance; in addition, as para 4.127 itself acknowledges, the Council's current Western Relief Road scheme is significantly different from the proposals which the public inquiry inspector was persuaded to recommend.

9. Just as fundamental as the A167 road's change in status is its subsequent traffic history. In 1988 the Annual Average Daily Traffic (AADT) flow on the A167 north of Neville's Cross was 20,500 vehicles; the predicted 2012 design level for then proposed Western Relief Road was 24,000-29,700 vehicles, and in arguing the case for the relief road the Department of Transport claimed that without the removal of through traffic from the A167 its traffic levels would increase to an AADT of over 30,000 and up to 42,000 by 2012. The Department for Transport's traffic counts for 2011 show that AADT flows on the A167 between the A690 and A691 junctions were 25,486 vehicles, barely more than their 2000 levels.⁸ The 2011 counts also confirm that traffic levels on the A167 are currently close to the lower end of the range that was forecast for 2012 *after the relief road was built*, and substantially *below* the volumes predicted for 2012 *if the relief road was not provided*.
10. Clearly the 1993 traffic growth forecasts which persuaded the inquiry inspector of the case for a western relief road were completely wrong. But this appears to be consistent with the Council's continuing mis-representation of the traffic situation in County Durham. Durham has one of the lowest levels of road congestion in the region and indeed in Great Britain, reflected in the fact that speeds on the county's A roads are higher than both the regional and GB average.⁹
11. There are errors of nomenclature, syntax and grammar in paras 4.128-131 of the *Preferred Options* document which make their precise logic difficult to follow, but the document still appears to base the case for the Western Relief Road on the long-discredited "predict and provide" approach. This case also appears to be dependent on the release of Green Belt land for housing, which the Trust, in common with other local and national bodies and many individuals, continues to oppose. However, even this element in the Council's case is qualified by the admission in para 4.131 that some housing could be built on the contested sites without requiring the provision of additional road capacity.

8 www.dft.gov.uk/traffic-counts/download.php

9 Data accessed through <http://www.dft.gov.uk/statistics/releases/congestion-on-local-authority-managed-a-roads-april-to-june-2012/>. Table CGN0206a shows that the average speed on Durham's locally-managed A roads in May 2012 was 34.1 mph, compared with a regional average of 29.6 mph and an England & Wales average of 25.4 mph.

12. The acknowledgement in para 4.129 of the document and in Jacob's work for the Council¹⁰ that further significant road network changes would be required to manage the adverse traffic impacts of the Western Relief Road provides additional demonstration that this proposal has not been properly scoped and evaluated. It is certainly not at the stage of robustness where the Council can confidently make the assumptions set out in the green boxes on pages 71-2 of its *Preferred Options* report.
13. In particular, and in addition to the opportunist incursions into the Durham City Green Belt which underlie the Council's housing and employment development proposals, the Western Relief Road would itself amount to a hugely damaging and unwarranted intrusion into the Green Belt. Its creation would despoil sensitive and historically-significant countryside; sever a mediaeval walkway and former railway paths which are widely used for recreational and active travel purposes; and inflict visual, noise and air pollution on the Browney and Deerness valleys. These impacts would be exacerbated by the vertical alignments which the proposed road would be required to follow because of the challenging topography along its route.
14. The Council's own analysis of Green Belt housing options provides extremely compelling evidence why the landscape west of the A167 and south of Whitesmocks should continue to be protected,¹¹ and this evidence applies with even greater strength to any proposal to force a new north-south highway through this sensitive area. It is disingenuous for the *Preferred Options* document to suggest on pages 72-3 that this road scheme is consistent with para 90 of the NPPF, when it is self-evident that the Western Relief Road will constrain the openness of the Green Belt and conflict with the purposes of including land within it. The Council's policies as set out in its *Local Plan Preferred Options* document do not provide the necessary evidence and justification either for the substantial financial investment that would be required to build the Western Relief Road or for the irreparable damage to the Green Belt that would result.
15. The Trust therefore urges the Council to abandon its damaging and unjustified proposal for a Western Relief Road.

10 See especially para 5.7, Jacobs, *Durham LDF option appraisal: final report*, (2012), p 73. Jacobs' report is however silent on the fact that its analysis demonstrates that by 2030 the northern leg of the Western Relief Road would itself be congested in the morning peak (Figure 27, p 69), and that the traffic flow on the local C17 road through Bearpark and Aldin Grange would increase by more than 200 vehicles in the morning peak and by in excess of 300 vehicles in the evening peak (Figure 29, p 76). The latter outcome is completely contrary to the impression created by para 4.129 of the *Preferred Options* document, which implies that there will be a reduction in "rat run" traffic through Bearpark.

11 Durham County Council, *Green belt sites assessment phase 2* (2010), pp 50-63.