

Question 3

Policy 1 – Sustainable Development

1. It is appropriate that this is the Authority's first Policy, and appropriate that the key phrase of NPPF – "presumption in favour of sustainable development" – should be quoted. However, a full reading of the government guidelines, compared with what the Council is actually proposing in its *Preferred Options*, suggests that it is actually concentrating on economic development, often with scant reference to sustainability, and at the same time at the expense of the linked social and environmental dimensions. The 20 criteria, cited in the Policy, against which developments are to be judged, are breached by the Council's proposals throughout the document. The most frequent and significant breaches are of criteria a, b, h and q. Examples of unsustainable proposals are numerous.
2. The proposal for new roads (Western and Northern Relief roads) does not pass the test of criteria a, b or h, is contrary to NPPF and even to the Authority's own transport policy. Its LTP3 states that it is "preferable that all new development is located to minimise the need for new road construction," and that, even when faced with a problem, "such projects shall only be pursued after all other options have been considered" (Appendix, p.11). The Council has not done the required homework on its two proposed "relief roads".
3. New roads will incur social disruption and environmental damage; increased travel will lead to higher levels of CO₂ emissions, making it increasingly difficult to achieve the aim of a 40% reduction by 2020. It is therefore a surprise to read in the Authority's Sustainable Travel Policy (47), under the heading of 'Accommodating Modes of Travel': "[I]t is very important that we plan in a sustainable manner for the accommodation of motor vehicles as private vehicles are the most popular mode of transport in the County" (para 9.19).
4. Travel will be increased as a result of building a new out-of-town shopping centre adjacent to Arnison, and by the concentration of 6,000 employees at Aykley Heads. (The latter is served patchily by public transport, with travel from Sunderland, the Raintons, Pitlington, East Durham, West Hartlepool, Crook, Meadowfield / Brandon / Langley Moor and the villages along the Deerness Valley all requiring a change at Durham Bus Station.)
5. The Authority is hardly proposing to "make the most effective use of land, buildings and existing infrastructure" (criterion h) when, in addition to new roads, it favours demolishing County Hall and Milburngate House, or when it ignores potential sites in the town centre (including Old Shire Hall and the former County Hospital) in favour of concentrating newly constructed office development at Aykley Heads.
6. The protecting and enhancing of the vitality and viability of town centres (criterion q) is hardly evident when it is proposed to build another out-of-town centre, incorporating a large food store, at Arnison. Durham City's centre has already experienced considerable

leakage from the Arnison and Sunderland Road centres; *Preferred Options* itself states that Durham City centre currently secures only 6.4% of main food expenditure arising within its catchment area (4.53).

7. The need for the Council to address the issue of sustainable development more wholeheartedly and holistically is emphasised by the fact that analysis by the WWF has demonstrated that, out of 60 British cities Durham ranked 53rd in terms of its ecological footprint, with an adverse impact 16% worse than the "best in class" (Newport, Plymouth, Salisbury, Hull, and Stoke-on-Trent)¹. This is not a record to be proud of, and suggests a reality so far removed from Objectives 10 and 15 and the fifth and six paragraphs of the Spatial Vision as to make it essential for the Council to undertake urgent re-assessment and reprioritisation.
8. The Trust therefore asks the Authority to recast its Sustainable Development policy in conjunction with a redrafting of its proposals. As presented in this document, the Authority's proposals appear to be pursuing growth at almost any cost: of sacrificing Durham City's incomparable character, of which its setting is an integral part, by ranking the Council's pursuit of "critical mass" above the rebuilding and vitality of the free-standing settlements elsewhere in the county.

1 http://assets.wwf.org.uk/downloads/city_footprint2.pdf This ranking refers to the former City of Durham Council area, and is based on the ecological impact of all forms of consumption in each city, of which CO₂ effects account for about 70%. The CO₂ performance element appears to find at least a partial echo in the Office for National Statistics' latest set of summary statistics for the north-east region, which drew attention to the fact that in 2009 the north-east had a higher level of carbon emissions per resident than any other English region. (<http://www.ons.gov.uk/ons/rel/regional-trends/region-and-country-profiles/key-statistics-and-profiles---august-2012/key-statistics---north-east--august-2012.html>) It should be noted that, according to the WWF city data, Durham City's ecological footprint ranking at 53rd was worse than Newcastle's at 41st, and considerably poorer than Sunderland's, which was ranked 8th.