

Question 48

Policy 47 - Promoting sustainable travel

1. While the Trust welcomes the Council's stated commitment to promoting sustainable travel that is expressed in the heading for this Policy, these principles appear in practice to have been largely ignored in the development of the strategic policies set out in Chapter 4 of the document. Consequently, much of the discussion on pages 204-09 does not match the reality of the Council's current proposals and is therefore largely empty rhetoric. Furthermore, even this discussion seeks to move away the focus from the underlying objective of promoting public transport and active travel that is generally regarded as central to the delivery of a sustainable transport policy, preferring instead the Council's novel reformulation as "planning in a sustainable manner for the accommodation of motor vehicles as private vehicles are the most popular mode of transport in the County".¹ Since the Council's current "sustainable travel" policy proposals are in actuality based on the principle of relegating bus and active travel to a residual role, the Trust finds it necessary to **oppose** the current way in which Policy 47 expresses the objective of sustainable travel and the way in which it has been interpreted and applied in much of the rest of the document.
2. The Council's proposed approach is both contrary to the provisions of its current Local Transport Plan (LTP3) and to the guidance of NPPF, both of which rest on a positive interpretation of sustainable travel. The latter states at para 29:

*The transport system needs to be **balanced in favour of sustainable transport modes**, giving people a **real choice** about how they travel. (Emphasis added.)*

It goes on at para 34:

Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.

3. Durham County Council's current failure to implement these positive obligations which NPPF places upon local planning and transport authorities is all the more disappointing because of the way its transport professionals anticipated this guidance in LTP3. While acknowledging the importance of regeneration for the county, the LTP policies also stressed other key outcomes:
 - Reduce carbon emissions
 - Promote equality of opportunity
 - Contribute to better safety security and health
 - Improve quality of life and a healthy natural environment.²

¹ *Preferred Options*, para 9.19.

² Durham County Council, *Local Transport Plan 3* (2011) para 3.4

4. The LTP Appendix volume which contains detailed justification of the approved LTP policies includes against Policy 5 the crucial statement that:

Road building can be disruptive and expensive and it is more **preferable that all new development is located to minimise the need for new road construction**. In terms of building roads to overcome problems relating to congestion and safety, then such projects shall only be pursued after all other potential options have been considered.³

5. Despite its quotation of para 29 of NPPF and other related guidance, the green box on p 209 of *Preferred Options* explicitly admits the limitations which the Council has chosen to place on the analysis of alternative options which would support real transport choice.⁴ The relatively small amounts which the Council proposes to spend on infrastructure to support sustainable travel options cannot be described as creating a balance in favour of sustainable modes when compared with the sums approaching £50 million which the relief roads would be likely to require.
6. It is also entirely misleading for the same paragraph on p 209 to claim that the Council is planning “positively through development” to control car use. The Council has completely failed to demonstrate any such policy focus in its approaches to the locational choices set out in its *Preferred Options* report, despite the strong emphasis which both NPPF and in the Council’s own LTP3 place on the importance of this factor in delivering a sustainable travel policy.
7. The NPPF acknowledges the importance of supporting economic growth, but crucially qualifies this by the inclusion of the term “sustainable”. It also stresses that sustainable development involves three inter-dependent dimensions: economic, social, environmental.⁵ The social dimension includes the read-across to equality of opportunity and access which is included in LTP3 but which is negated by the priority which is given in the *Preferred Options* proposals to out-of-centre sites for housing, retail and employment which will only offer non-car access which is qualitatively and quantitatively poorer than that available to car owners. The environmental dimension includes recognition of carbon and other polluting impacts on the environment, together with landscape quality and other effects on the natural environment which would also be compromised by car-based policies and by locational choices which consume greenfield and greenbelt sites in preference to the re-use of brownfield land and to the strengthening of existing town centres.
8. Because of its blinkered approach to the options available for delivering economic growth, the draft Durham County Plan falls short on all the other key tests of sustainable

³ LTP3, Appendix, p 11. (Emphasis added.)

⁴ These evaluation failures are discussed in more detail in the Trust’s response to QQ 10-11.

⁵ NPPF, para 7.

development. It certainly cannot be regarded as embodying sustainable travel principles. The Trust cannot therefore support the Council's draft Policy 48 as currently formulated, and considers it to be inconsistent with both NPPF and LTP3.