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By email to: [TransportPlan@transportnortheast.gov.uk](mailto:TransportPlan@transportnortheast.gov.uk)

Dear Sir/Madam

**North East Transport Plan 2021-2035: consultation draft**

This letter provides the response of the City of Durham Trust to the above consultation document. The Trust is a registered charity, established in 1942, and its primary objective is to preserve, conserve and enhance for the benefit of the public the natural and built environment of the City of Durham and its surroundings. Transport has major impacts on the city and its hinterland, so because of this the Trust has for several decades been closely involved in planning processes relating to future transport provision in its area.

***General comments on the draft Plan's approach***

Although the Trust agrees with the draft North East Transport Plan's [NETP] overall vision of "Moving to a green, healthy, dynamic and thriving North East", and accepts in broad terms its stated objectives, it is entirely opposed to the present draft of the Plan, and has very strong concerns about the process that has been followed in developing this draft. Nowhere in the document itself is its actual purpose and status explained: consultees have to resort to the "FAQ" section of the Joint Committee website to establish that the draft is intended to become a statutory Local Transport Plan [LTP], to replace the existing plans of the constituent authorities. From the perspective of County Durham residents, this entails the replacement of the existing LTP3 (a 179 page strategy document, a 91 page detailed appendix and a 47 page delivery plan) with a 58-page document that will apply to a far larger area and population than each of the existing LTPs that will be replaced.

Considered against the relevant guidance and the general principles of sound public governance, the "policy areas" as outlined within the document fail to provide an adequate, consistent and systematic framework for the achievement of the vision and the Plan's stated objectives across the Plan area; the proposed performance measures do not set out a robust methodology for measuring success; and the implementation programme set out in the draft's final pages is not prioritised or related to objectives in any meaningful way, and appears to be largely contingent on Government funding.<sup>1</sup>

Furthermore, the specific Department for Transport guidance on scheme selection within Local Transport Plans, which is consistent with the Treasury Green Book and with other guidance issued by both the DfT and the Department for Communities and Local Government, makes it clear that transport schemes should be tested against other means of achieving their stated objectives, and that preferred options

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<sup>1</sup> Further discussion of some of these matters is provided in the "specific comments" section beginning on page 5 below.

# THE CITY OF DURHAM TRUST

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should be subjected to full appraisal before inclusion within a programme.<sup>2</sup> The draft NETP provides no evidence or assurance that such a process has been followed - “shovel ready” is not an adequate criterion for selection for early delivery, and indeed the DfT guidance specifically cautions that “Local authorities should not assume that schemes which have been under consideration for a long period (particularly infrastructure projects) are still the most appropriate solution to identified challenges.”<sup>3</sup>

## *Quality of evidence*

Again contrary to the national guidance, the draft NETP as presented does not include an adequate evidence base, and in most instances relies on incomplete and sometimes misleading infographic data. Although page 3 of the draft refers to a Technical Appendix, this does not appear to be accessible through the Joint Committee website.

NETP also refers on the same page to an “accompanying” Integrated Sustainability Appraisal [ISA]. This report is available through the Joint Committee website,<sup>4</sup> but strangely no direct link to the ISA is provided from within the draft Plan itself. Consequently many consultees who have navigated directly to the Plan itself will have been unaware of how to access it and to take it into account in their responses.

While superficially the report appears to satisfy the legislative requirement to assess the impact of the Plan upon the environment and against other statutory criteria such as habitats, health, and equality, there are methodological weaknesses in the approach that its authors have followed. In particular, despite its claim to have taken an area-based approach, the ISA disaggregated the plan’s impacts in two different ways. The core Tyne & Wear conurbation and the city of Durham were each defined in their own right as geographical localities. However, places in the remainder of the Plan area were grouped together functionally rather than geographically, and categorised as either “Post industrial communities,” “Market towns,” “Coastal areas,” or “Rural”, the last encompassing all the areas in the region left out of the other definitions.

As required by the guidance, the impacts of alternative scenarios were then tested against each category, but apart from a “do minimum” baseline, those alternative scenarios were not consistent across all categories. Moreover, no definitions were provided of the actual content of each non-baseline option that was being tested. While the assessment typology may reflect some common characteristics of places as distant from each other as Berwick and Bishop Auckland (market towns) or Middleton in Teesdale and Alnmouth (rural), transport is by definition about mobility, and about connecting links that are defined by geography rather than by the current characteristics of any particular area. For example, a through train journey from the region’s newest station, Horden, to Haltwhistle starts in a “post industrial community”, then passes into a “coastal area” before entering Tyne & Wear. Upon leaving the conurbation it will enter a “rural” area, call at a “market town”, Hexham, before journey’s end back in rurality at Haltwhistle, the region’s most westerly railway station. A single train on a railway route that is timetabled as an entity will therefore be meeting the transport needs of five out of the ISA’s six category definitions, and both the train service’s and the route’s potential impacts will need to be assessed against six differently-defined incremental options when compared with the existing “do minimum” scenario.

Such a broad-brush and opaque appraisal process is unlikely to provide consultees with confidence in the objectivity of the “1,2, or 3” numerical ranking of impacts applied by the consultants, still less with the

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<sup>2</sup> Department for Transport, *Guidance on Local Transport Plans* (July 2009), pp 26-8. See also Department for Communities & Local Government, *The DCLG Appraisal Guide* (2016), especially p 9 and sections 1-2; and DfT, *Transport Analysis Guidance: the transport appraisal process* (2014).

<sup>3</sup> *Guidance on Local Transport Plans*, p 27 para 28.

# THE CITY OF DURHAM TRUST

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collation of all the separate results across all the different impact themes required by the ISA procedure which enabled the authors to conclude that the “NETP work programmes have the potential to lead to a range of significant positive environmental and socio-economic effects for the North East”, despite the report’s parallel finding of potential for significant negative impacts.<sup>5</sup> And that is before taking account of a point made briefly in the preceding paragraph and which is raised subsequently in this response: the lack of any adequate definition of the actual scope and content of each of the more than 280 interventions numbered in the delivery plan. Some of the uncertainties that this causes are actually mentioned in the ISA: for example, the extent of land-take required for individual infrastructure projects, or the permeability of surfaces to be used for active travel routes, but ironically are noted more particularly when discussing mitigations rather than the projects that would give rise to the need for them. But in the absence of even a rough estimate of the physical scale and form of the “hard” infrastructure interventions that are proposed in the draft NETP it is not possible to quantify the extent of the impacts that their construction will give rise to, and therefore to provide a sound basis for their assessment. Similar uncertainties apply to assessing their continuing operational impacts, especially during a time when future trajectories are having to be recalibrated.

The evidence base for the ISA is therefore dependent on the strength of the evidence for the draft Plan itself. As already noted above, this is deficient. The legislation requires that the starting point of any LTP should be an assessment of the adequacy of the existing transport network to meet the needs of people living, working, or travelling through that area, and to provide for the transportation of freight.<sup>6</sup> The draft NETP fails to supply any objective categorisation or analysis of those needs and of the adequacy of how they are currently being met. It also fails to disaggregate these needs to establish the key network flows both within, into and out of the region. This failure includes the lack of any meaningful discussion of travel-to-work patterns.

For example, the upper centre infographic on page 19 of the draft Plan, although headed “Travel to work”, simply comprises pictograms for six local authority areas. These pictograms lack any accompanying discussion or means of interpretation, but more importantly do not include County Durham, the local authority with the largest population (and therefore the greatest travel need) among the “LA7”.

Whether this omission was an oversight or deliberate, it results in a significant gap in the draft NETP’s relevance to the transport needs of County Durham residents, who are, as previously noted, the Plan’s largest single constituency. The data set which appears to have informed page 19 of the draft is the travel-to-work tables of the 2011 Census. These show that the overwhelming majority of Durham residents travelled to work within the county (76%, a significantly higher proportion than any of the other joint committee authorities), but 40.5 thousand worked elsewhere in the Plan area. Sunderland was the largest single destination, accounting for almost a quarter of the out-commuting from Durham to elsewhere in the NE7.<sup>7</sup>

However, a further 17.6 thousand commuters travelled across Durham’s southern boundaries to work in Tees Valley local authority areas. Darlington alone accounted for 8.5 thousand of these journeys, making it the fourth largest external work destination from County Durham, only 130 fewer than Newcastle. When commuters into County Durham are brought into the equation, the two-way journey-

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<sup>4</sup> [https://www.transportnortheast.gov.uk/wp-content/uploads/2020/11/NETP-ISA\\_ISA-Report\\_v3.0\\_061120.pdf](https://www.transportnortheast.gov.uk/wp-content/uploads/2020/11/NETP-ISA_ISA-Report_v3.0_061120.pdf)

<sup>5</sup> ISA, overall conclusions [pdf page 4]. It should be noted that the ISA report appears to apply different nomenclature to the NETP “work programmes” from that in the Plan itself.

<sup>6</sup> Transport Act 2000, as amended, S 108.

<sup>7</sup> 2011 Census data from table WU03UK - *Location of usual residence and place of work by method of travel to work* (accessed via NOMIS, 8-9 Jan 2021.)

# THE CITY OF DURHAM TRUST

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to-work flow between the county and Darlington was third in total magnitude, behind that with Sunderland and Gateshead but significantly greater than the total Newcastle flow. The County Council's own evidence confirms the importance of Darlington, together with Hartlepool, Stockton and Middlesbrough, among travel-to-work destinations from the southern parts of the county, with Darlington being significantly more important than Newcastle or Sunderland as an attractor, and Stockton, Hartlepool and Middlesbrough each drawing at least twice the number of commuters from south-east Durham as Newcastle.<sup>8</sup>

This data is not surprising, in view of County Durham's geographical location within the wider North East region: the 2011 census data shows that the county's southward commuting flow into the Tees Valley sub-region was almost ten times that of the next largest, Sunderland's 1.8 thousand. The only other LA7 authority exhibiting a cross-border outflow of more than a thousand workers was Northumberland: this was in the opposite direction, and is largely explained by Berwick's location on the Scottish border, closer to Edinburgh than to Newcastle. Durham's position as a geographical and function outlier within the NE7 sub-region is further emphasised by the fact that the 2011 commuter flow from County Durham beyond Darlington to North Yorkshire, including York and the county areas, was 1.8 thousand – more than the collective total from the rest of the Plan area. Similar patterns are reflected in the 2011 data for in-commuting to the Plan area, though generally at lower volumes, and County Durham accounts for the bulk of the excess of out-commuting over inbound flows depicted on page 19 of the draft Plan.

Many of these daily commuter movements between County Durham and local authority areas to the south are significant in terms of the peak hour travel demand that they represent, and in some instances are greater than inter-authority flows contained wholly within the Plan area. The DfT Local Transport Plan guidance emphasises the importance of making adequate provision to take account of cross-boundary travel demand as part of the plan-making process,<sup>9</sup> yet the draft NETP is silent on these matters.<sup>10</sup> Quite apart from the other defects in the plan, this in itself is a strong and sufficient reason for its rejection.

Evidence about network performance is also presented in a superficial, anecdotal and cursory way. For example, NETP makes policy comments about congestion at several places in the document, but apart from the screen grabs on page 38 – which are themselves almost impossible to read on screen - the only piece of hard data that is provided is an infographic on page 18. But that appears to be based on data from the Strategic Road Network in the region, which is the responsibility of Highways England rather than the local authorities. It also mixes together information from the LA7 and the wider north east, and includes headlines which are meaningless without any stated reference point – “Over the last 10 years 1.2 mins slower commute 0.5 miles longer commute” Compared with what? And do the two changes cross-refer? Is the longer time simply a result of the greater distance? And what, if any, is the significance of this information in policy terms?

The reality is that the official DfT delay and journey speed statistics show that the LA7 authorities, individually, relatively, and collectively, experience some of the lowest levels of congestion among comparable areas anywhere in England. The council in the north east with the slowest average speeds on its local A roads is Newcastle, one of England's core cities. Only one comparator city, Leeds, has a higher average. But Leeds City Council extends over an area which is almost five times that of

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<sup>8</sup> Jacobs, *County Durham travel patterns – 2011 census analysis* (2018), Appendices E and F, pp 34-5.

<sup>9</sup> DfT, *Guidance on local transport plans*, p 23.

<sup>10</sup> Although the Bishop Auckland-Darlington railway line is shown on the document's mapping, and is listed in the text, the draft plan contains no discussion of its role or potential for enhancement, in marked contrast with the treatment of the Tyne Valley and Durham Coast lines and the discussion of possible restoration of local rail routes elsewhere in the Plan area.

# THE CITY OF DURHAM TRUST

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Newcastle and includes a considerable rural fringe. Every other major city in England experiences slower traffic speeds on its local A roads than Newcastle, with the worst outside London, Manchester, having an average in 2018 that was 22% below Newcastle's.<sup>11</sup>

As the draft NETP also notes on page 18 that County Durham and Sunderland have congestion levels below the national average (as indeed does Northumberland), it is difficult to see how the evidence on that page supports the priority that pages 28 and 40 assign to “improving the free flow of traffic on our roads”, especially since this conflicts directly with other objectives, including increasing the share of sustainable travel within the region, reducing carbon emissions, and improving transport safety – on all-purpose roads, accident severity increases with the speed of traffic. The attempt to justify this policy objective by referencing freight and essential car journeys is meaningless without any proposals to restrain other categories of car traffic, while the categorisation of selected road schemes as “all user” improvements in the 5-yr accelerated funding implementation plan on page 51 is no more than greenwash in the absence of any information about the proportion of sustainable travel journeys using those roads, or of specific proposals to ensure an increase in that proportion.

## *Specific comments*

This part of the Trust's response provides more specific commentary on various elements of the draft NETP. While broadly following the structure and order of that document, to avoid duplication some comments refer to more than one section of the draft Plan, and in the interests of brevity the comments mainly focus on those issues or proposals which are of particular concern to the Trust. **The absence of a comment on any particular subject should not be taken as implying the Trust's support for that part of the draft NETP. Where support for a particular proposal is shown, that does not override the Trust's objection to the Plan as a whole, but is intended to indicate elements which it considers should be included in a comprehensive revision of the NETP.**

*Vision and objectives: p 6.* The vision statement and objectives are largely unexceptional: the weakness lies in their translation into “policy areas” and “overarching policy areas” without any indication of how conflicts and tensions between them will be resolved and how the various objectives will be prioritised in seeking to achieve the vision. For example, the phrase in the “making the right travel choice” banner ‘*We will enable people to make greener and healthier travel choices whenever they can and ensure our sustainable network takes everyone where they need to go at a price they can afford*’, while a laudable aspiration, in effect promises everything to everyone. But it also requires choices by the Joint Committee: such a promise about sustainable travel can in reality only be met by actively limiting the choices of users of unsustainable modes.

*Our transport network and travel habits: p 18.* After noting that the region has the “basis” of a fully integrated public transport network, the target of 2035 for delivering a properly integrated network across the whole of the Plan area is astonishingly unambitious, especially when compared with the document's subsequent early prioritisation of highway schemes. Powers for achieving better integration are already available to local authorities, and many improvements can be achieved with little or no capital investment. Integrated ticketing was one of the key priorities sought in public responses to Durham's LTP3 consultation in 2010: more than a decade later no progress has been made in extending integrated ticketing to the county's main bus networks.

*P 19.* See comments in *Quality of evidence* section above.

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<sup>11</sup> DfT Table CGN0501(b), accessed via [Travel time measures for the Strategic Road Network and local 'A' roads: April 2019 to March 2020 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/684242/Travel_time_measures_for_the_Strategic_Road_Network_and_local_A_roads_April_2019_to_March_2020_-_GOV.UK.pdf)



# THE CITY OF DURHAM TRUST

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*P 20.* The infographics mix national, T&W and regional (?LA7) data without any clarity or coherence so far as the Plan area as a whole is concerned.

*P21.* As in subsequent sections, the treatment of “local rail” appears to be confined to those services operated by Northern. Local rail travel between Durham and Newcastle is one of the largest flows anywhere on the ECML, but is largely carried by long-distance operators and does not depend on 1980s diesel trains. Unless such travel (and similar main line flows from north of Newcastle) is brought into the analysis, the Plan’s consideration and understanding of the total role of rail travel within its area will remain inadequate.

*Safe, secure network: pp 22-3.* The references on p 23 to the area’s high proportion of child road accident victims and to the level of KSI pedestrian casualties emphasise the need for an early and comprehensive regional strategy to tackle this blight, with the full engagement of the two territorial police forces.

The draft Plan contains very few mentions of children and their travel needs, other than in the context of school travel. The last fifty years have seen a steady decline in independent travel by children, and a corresponding increase in escort journeys, mainly by car. Children have suffered from the loss of their street space to car parking, worsening air quality, reduced physical activity and loss of freedom to play out and make their own journeys. All of these changes have resulted from increased car ownership and use. Providing safe routes to school should be only the first step in rebalancing our transport network. The needs of children, along with the needs of other vulnerable and disadvantaged people, should be recognised as one of the highest strategic priorities.

Urgent priority must also be given to applying and enforcing 20 mph zones in urban areas across the LA7 area. Some authorities in the region have introduced 20 mph as the default for residential streets; others, including Durham County Council, have made very limited changes thus far. The Plan also needs to promote the targeted closure of residential streets to through motor traffic in order to eliminate rat runs where alternative network routes are available. Such measures are a necessary pre-condition for increasing active travel. Where historic main roads have been by-passed, the aim should be to route traffic onto the newer roads where possible, restoring historic routes to the use of sustainable travel modes by filtered closure points.

*Measures of success (key performance indicators): pp 25-6.* The graphs forming part of these infographics are meaningless, since they provide no scale and in some instances the trajectory slopes are counter-intuitive - for example, accident reductions are shown as an upwards rather than a declining line. The figures at the head of each box appear to be pre-Covid baselines rather than targets, and attempts to infer trends and outcomes by combining these baselines and the trend graphs suggest that the Plan’s aspirations for “success” (by 2035?) are modest, with only minimal movement of the endpoint marker relative to the baseline except where Covid effects have worked in the same direction. It is to be hoped that it is the graphing, rather than the aspiration, that is flawed, since otherwise there would be absolutely no justification for the Plan’s bid for £6.1 bn funding to deliver its objectives. The text on monitoring and evaluation is equally disappointing, since it suggests that the definition of target outcomes and KPIs has yet to be undertaken at individual project level – consequently any targets implied by the boxes on these pages must be purely conjectural. This approach confirms that the programme set out later in the draft Plan does not have any existing quantified correlation with the NETP’s stated objectives, and is being proposed for adoption on a basis which does not comply with the DfT guidance described on p 26 of the document.

*Our transport network: p 28.* The grid of pictograms is an elegant piece of design, but is there any substance to the form? For example, does the number of different policy areas and objectives in each column imply a priority weighting? And if so, how does the policy area score weigh against the objectives score? This comes back to the point made in commenting on page 6 of the draft and elsewhere

# THE CITY OF DURHAM TRUST

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in this response - the document fails to provide any transparent evidence of the basis upon which delivery priorities will be determined.

*Making the right travel choice: p 28-31.* These pages appear to form an introduction to the following modal pages, but while they set out in abstract the role of opportunity and of a decision tree, and acknowledge issues such as behavioural factors and transport poverty, they shy away from the consequences of travellers' making the "wrong" choice. The notion that a Dedicated Regional Behaviour Change Team (no matter how Ambassadorial) [pp 31; 51] can "ensure" that people make the right travel choice seems to be at odds with the basic principles of how behavioural change is achieved in the absence of any form of coercion. Since there is already considerable academic and practical research literature on the issues that the team will be asked to consider, the target date of "by 2035" seems unnecessarily distant for the envisaged "transition".

*P 30.* The juxtaposition of statements about situations where car is the "only" choice and about car being likely to continue as the most popular form of transport suggests that, contrary to the assertions on pages 4 and 57 that NETP cannot be a "business as usual" Transport Plan, that is what the present draft will turn out to be in the absence of any more proactive measures to constrain what the document implicitly defines as "non-essential" car journeys. [See, for example, the orange box on p 40.] Car drivers start with a greater range of travel options than those available to non-car drivers,<sup>12</sup> and therefore have greater choice regardless of the purpose of their journeys, and this has been reinforced during the present emergency by the absolute reduction in the availability of public transport as well as by messaging. In social justice terms, relying solely on what are ultimately optional travel choices in such circumstances will inevitably deepen rather than reduce transport poverty unless reinforced by stronger market signals and a meaningful reallocation of public resources – including road space - between different modes and users.

*P 31.* The policy statement on this page has already been the subject of comment – see above against p 6.

*Active travel: pp 32-3.* The Trust has consistently argued for greater priority to be given to active travel (but also that measures to promote cycling should not be at the expense of pedestrian safety and amenity). It is however sceptical about of the emphasis on more recent modes of micromobility. Yes, many car journeys are under 5km, but the bicycle has long been available for shorter journeys. It is therefore wrong to assume that the arrival of the e-scooter and the e-bike will lead to significant modal shift without the provision of a network which gives people confidence that they will be safe from motor vehicles and which avoids conflict with pedestrians. Indeed, without such a network, the rise of new forms of micromobility will just add to conflict on footways and the need for more effective enforcement of usage regulations. The DfT's latest guidance documents, including 'Gear change', give a very strong steer that local authorities must stop defaulting to the shared use path. The NETP talks of "an even better Active Travel offer" without recognising that for most people the current offer is quite basic, and far from compliant with the latest guidance.

While the Trust supports the call for better maintenance of active travel infrastructure, especially footways, on p 33, it notes that many of the potholes and ruts of concern to Cycling UK will be on carriageways, and therefore general road maintenance is also important for active travel. It is also important not to over-state the health case for active travel – the life expectancy data from Finland noted in the green box on p 33 reflects a range of interventions, most particularly significant dietary changes

Fundamentally, though, if there is to be an area-wide policy to promote active travel, there needs to be a commitment in the Plan to a comprehensive active travel network across all seven local authorities, built to a high standard of design and with good network density. While all these activities

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<sup>12</sup> In addition to income, age and infirmity should not be overlooked as factors that limit access to car travel, especially in the regional context noted in NETP of an ageing population.

# THE CITY OF DURHAM TRUST

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are mentioned on p 33, there is no clarity as to how this will be achieved, whether in terms of funding, planning, or design. In the relatively short term, LCWIPs need to be produced across all urban areas. The NETP then needs to ensure that town centres and main destinations will be tackled first, building outwards from there to produce complete routes, rather than piecemeal provision on the less-challenging sections.

In June 2017 a Trustee attended a NECA consultation event in Gateshead on a proposed cycling and walking strategy, and the need for high quality design standards was also raised at that forum. At an on-line NETP consultation session this month, a Trustee asked about common standards for infrastructure to ensure consistency across the region. The answer given by a joint committee official was that there would need to be consultation with Sustrans and other stakeholders. Why, in the intervening three and a half years, have these issues not been settled before the draft Plan reached this advanced stage?

Running through page 33 there is a recurrent theme of involving the community: “delivery of this can only be by a partnership”, “communities should lead on how space is best used in their localities”. While it is right to involve local communities, it is also important to manage consultation and provide strong political leadership when change is seen as a threat by people who are overly dependent on car use. The lack of even any target, let alone a commitment, to suitable spending levels on active travel does not give any degree of confidence that this plan will be transformative. There should be a clear, aspirational funding target so that progress can be monitored and the need for additional funding clearly evidenced across the region. The NETP is a 15 year plan. In that timeframe, starting in the late 1970s, the Dutch created cycle networks in most towns of a quality which has still not been attained in the North-East.

A stronger vision, informed by models like the Propensity to Cycle Tool, of how much modal shift could be achieved would help people to envision how our towns and neighbourhoods would benefit, not just from increased Active Travel, but also greater social cohesion and better health outcomes. This goes back to the lack of quantifiable targets (pp 25-6).

Note that the paragraph at the top of the second column of p. 33 would appear more logically to precede the final paragraph of the first column.

*On-demand public transport: pp 35-36.* While the Trust welcomes the reference to the role and value of taxis in the transport network, its members’ experience of them in a medium-sized city such as Durham is that they are far from providing an anywhere, 24 hr service except by advance booking, a process that is frustrated by the lack of the central taxi booking and control systems that are available in some large cities. In addition, the lack of such co-ordination results in heavy reliance on city-centre ranks, causing noise and air pollution and a general lowering of streetscape amenity. The Trust would strongly recommend more effective licensing conditions at either local authority or regional level which required taxi-operators’ participation in central booking systems, their collective provision of agreed minimum service availability levels, and ensured better management of local taxi ranks where these were needed.

*Private transport and using road infrastructure: p 38.* The Trust welcomes the fact that DCC’s proposed Northern and Western relief roads have not been included in the draft following their rejection by the Government inspector as unsound and not compliant with national policy in his report on the County Plan. However, the narrative on this page contains a description of the level and causes of congestion in Durham City which the Inspector determined was not supported by the Council’s evidence and led him to conclude that the roads were not necessary to promote economic growth or the improvement of traffic and environmental conditions in the city centre.<sup>13</sup> The NETP should not perpetuate the erroneous statements about Durham City currently made on this page and implied elsewhere in the document in general references to congestion at river crossings.

The Trust also disagrees with the apparent underlying general premise of this section that the road network is congested and that all traffic should be able to flow freely. Surely the starting-point of a Plan

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<sup>13</sup> [InspectorsFinalReport.pdf \(durham.gov.uk\)](#) , pp 27-30.



# THE CITY OF DURHAM TRUST

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with objectives such as those of NETP should be to **reduce** road traffic. This objective was explicitly set out in DCC's LTP3,<sup>14</sup> which NETP is intended to replace. If such a policy was considered strategically important in 2011 it is now even more necessary when all the local authorities in the Plan area have acknowledged the climate emergency. While the Newcastle Clean Air Zone targeting public transport and goods vehicles is mentioned, absent from this section is any consideration of the role of demand management measures for private vehicles such as congestion charging, workplace parking levies or ultra-low emissions zones.

*Public transport: travelling by local rail and Metro: pp 41-3.* The Trust supported the proposals for extending the Metro into County Durham through the County Plan processes, and remains strongly supportive of the ambition to use the Leamside line for this purpose. However, it also considers that the disused branch from Leamside to Newton Hall should be included as part of such a Metro extension, with the ultimate objective of connecting into the centre of Durham City.

*Local rail.* Previous sections of this response have commented on the need to integrate local travel by main-line long distance trains into the region's transport planning, and have also commented on the lack of acknowledgment of the role of the Bishop Auckland-Darlington line in the NETP.<sup>15</sup> These comments remain relevant to this section of the draft Plan

Although not mentioned in the text, the timeline of interventions proposes the reinstatement of rail services to Consett by 2035. The majority of journeys-to-work from Consett terminate within County Durham, and the largest destination for intra-county trips is Durham City. This needs to be factored in to the determination of the optimal rail route to Consett.

Connections to Teesside from County Durham could be greatly improved by means of a passenger service on the Ferryhill to Stockton freight line.

*Connectivity beyond our own boundaries: pp 44-6.* The draft Plan does not acknowledge the role of Tees Valley airport. Though beyond the NETP plan area, it is easily accessible from both Sunderland and County Durham, and pre-pandemic offered some important links from the north-east both to other parts of Great Britain and abroad.

*P 46.* The emphasis on HS2 is misplaced, and is unlikely to be helpful to the north-east in the medium term. Delays with the project and the National Infrastructure Commission's recent report recommending against completion of the Eastern leg make it extremely unlikely that through HS2 services to the north-east will materialise within the NETP period. It is also questionable whether it is environmentally sound to incur the extra energy costs of diverting high speed rail travellers between the north-east and London on to the longer route via Birmingham when closely-comparable journey times could be achieved on the existing route.

A more immediate threat to the north-east's external connectivity within GB is likely to result from a reduction in the two trains per hour between Kings Cross and Edinburgh in the current "normal" timetable to one if and when through Euston-Edinburgh HS2 services commence via Carlisle. The joint committee's efforts on behalf of the residents of the Plan area would be better invested in that issue.

Suggestions that the region's connectivity would be improved by dualling the cross-border stretch of the A1 are also entirely misplaced. Pre-pandemic traffic counts show that the A1 north of Alnwick and south of Dunbar is operating well within its design capacity, and there is no significant congestion on the cross-border section. If NETP aspires to an increased budget for all transport investment in its area, it is clearly not in the interests of every other proposal within the Plan area to prioritise dualling of sections of trunk road when traffic demand does not justify such an intervention.

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<sup>14</sup> DCC, LTP3, Appendix paragraph A.5.2.

<sup>15</sup> Both the NEXUS and County Durham journey-planning tools assign relevant intra-regional trips to this route, which offers the fastest journeys between Newcastle and County Durham stations on this line.

# THE CITY OF DURHAM TRUST

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*Research, development and innovation: p 47.* While obviously horizon-scanning is important to any long term planning, it is difficult to see the relevance of travel at hypersonic speeds to the transport needs of the LA7 region in the period up to 2035. And while the “connected and autonomous” project led by Sunderland is of interest in terms of the specific freight transport needs of a major site, a much more urgent priority which is not mentioned here or elsewhere in the draft Plan is to establish how HGV road transport can be powered in future if existing internal combustion technology is to be phased out to meet carbon reduction targets. Given the importance that the draft Plan attaches to road freight transport, that is likely to be one of the largest potential disruptive factors affecting transport in the medium term and needs to be more adequately scoped.

*Delivery plan: pp 49-53.* The Trust’s strong opposition to “shovel-readiness” as a justification for scheme selection has already been expressed and is reiterated here, together with our concerns (a) that low-cost public transport integration and active travel initiatives are not proposed for earlier implementation when there is less need for outside funding for such schemes, and (b) that road improvement schemes are being mis-branded as “all-user” projects without any evidence or justification. Other than that, we have only two further comments to make on these pages. The first is the relatively minor point that Durham City is the only large settlement in the region not to be shown on the mapping, and the only main transport node not to be shown with a box identifying the relevant proposals. But leading on from that last comment is a much more important point. These map pages do not constitute a delivery plan which meets the legislative requirement for one to be provided. There is no comprehensive table of schemes to enable easy reference from the map, and no estimated cost data for the proposed interventions either individually or as totals within each of the suggested delivery phases, other than a bare outline graph on p 55. The “implementation plan” is no such thing – it is an unpriced wish list for schemes with unquantified outcomes, and it is difficult to see how central government can be expected to provide a blank cheque to the joint committee on the basis of such an inadequate prospectus.

## ***Concluding remarks***

According to Durham County Council’s transport policy web page, the NETP, “currently being drafted”, “will be out for public consultation in 2018”.<sup>16</sup> While clearly the pandemic has emerged since then, and has evidently resulted in considerable redrafting of the document, it is disappointing that after all this time the eventual draft NETP is so flawed. In comparison with the County Durham LTP3, and with recent examples of 4<sup>th</sup>-generation LTPs from other parts of England,<sup>17</sup> the NETP is an extremely flimsy document, not merely in terms of its length, but more importantly in its actual substance. Behind the presentational gloss, there is no systematic evidence to justify the way its objectives have been translated into a delivery plan, and the schemes themselves are listed only in outline without any indication of their costs, deliverability, or outcomes. There is also a major issue from a County Durham perspective of the draft Plan’s failure to recognise the county’s significant transport interdependencies with other local authority areas to the south of the Plan area. The integrated sustainability assessment accompanying the main Plan document rests upon a questionable methodology and is necessarily further flawed by the lack of firm data to draw upon from the Plan itself.

The Trust sympathises with the Plan’s concerns about the imbalance between transport spending in London and the south east and that in the north east, though the large recent provision for renewal and enhancement of the Nexus Metro should not be ignored. However, the history of the north-east, dating

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<sup>16</sup> [Transport policy - Durham County Council](#)

<sup>17</sup> See, for example, Buckinghamshire [bcc-local-transport-plan-4.pdf \(buckscc.gov.uk\)](#); Kent [Local-transport-plan-4.pdf \(kent.gov.uk\)](#); Lincolnshire [Lincolnshire County Council Local Transport Plan 4](#); Oxfordshire [Background](#)

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back at least as far as the Hailsham plan of the mid-1960s, contains several initiatives to improve the relative position of the north east by means of substantial investment in transport schemes, particularly roads infrastructure. Yet, as the draft Plan itself notes, the north east still lags behind most of the rest of England in its performance against key economic and social indicators. As the recent inspector's report on the County Durham Plan confirms, investment in road schemes is not a necessary precondition for growth, and can come with too great an environmental cost.

The draft Plan acknowledges two fundamental changes that have taken place since the Joint Committee was established: the unanimity among the constituent councils that climate change constitutes an emergency – a policy position subsequently reinforced at UK government level – and the impact and probable future overhang of the present pandemic. These two issues should be front and centre of planning for the remainder of the 2020s, with a particular focus on those groups within society who have been disproportionately affected by the pandemic: younger people and the socially disadvantaged. These are also the groups whose transport choices are generally most limited. While the draft NETP notes the issues of climate change and social justice, it lacks any convincing proposals for early action to address them. When this gap is considered alongside the process and evidential weaknesses in the draft that are detailed in the main body of this response, the Trust can only conclude that the NETP in its present form is not fit for purpose, and requires comprehensive redrafting.

I realise that these comments will not be welcome, but Trust members who have been able to participate in some of the consultation meetings that have been held during the course of the Plan's preparation have felt that these have not been responsive and helpful in addressing concerns that they and other members of the public have raised. If it would assist to explain more fully the strong reservations that have led to this response, I would be more than happy to arrange an on-line discussion between two or three Trustees and relevant officials from the Joint Committee. In the meantime I would appreciate an acknowledgment of your receipt of this email.

Yours faithfully

John Lowe  
Chair, City of Durham Trust