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Spatial Policy Team Durham County Council County Hall Durham DH1 5UQ

7 August 2016

Dear Sir or Madam,

Durham City Sustainable Transport Strategy, 2016–2033

I write on behalf of the Trust Pathways, an organisation set up to encourage collaboration on creating safe cycle networks in Durham City and the surrounding area. Members of our group have been involved in the stakeholder sessions during the formulation of this strategy and we would now like to take the opportunity to comment on the full report.

Summary

- Sufficient reduction in carbon emissions attributable to transport cannot be achieved without a shift away from private motor vehicles, whether powered by fuel or electricity. This should be made explicit in the objectives.
- The strategy needs a stronger link to land use planning, and should be more critical of current local planning policies and practice.
- The adoption of a user hierarchy which places walking and cycling as the highest priority, needs to be followed through by early identification of a core city-centre cycle network before further money is wasted on junction and road improvements which have not included cycling in the design process. Plans for improvements to North Road should be halted until a cycling route has been identified.
- "Smarter choices" promotion will not be effective until better cycling infrastructure is provided. After a core city-centre network is provided, high quality radial routes should be provided to each suburb in turn, and promoted as they are finished.
- Continuing engagement with stakeholders, including cycling groups, is crucial.
- Before considering building relief roads, new routes for walking and cycling should be provided, such as north to east via the Belmont Viaduct, and from Belmont and Carrville to the University via Old Durham and Maiden Castle.
- The strategy is weak on timescales, quality and targets.

• Delivering the strategy will require staff resource within the council to be reapplied to sustainable transport solutions instead of road widening and similar traditional occupations of highways engineers.

Overall objectives and strategy

The sections on the vision and objectives on page 8 do not explicitly refer to the need to reduce carbon emissions attributable to transport. Although the words 'sustainable', 'environmental' and 'greener' are used, from the context it appears that a local, rather than a global interpretation is being applied. For example, "wider environmental and townscape objectives might demand a reducing reliance on the car, particularly in the city centre". There is no doubt that, in terms of greenhouse gas emissions, reliance on car travel has to be greatly reduced, so the word 'might' in that sentence is timid. The five themes of the Sustainable Community Strategy are listed, but the objective corresponding to "Altogether Greener" is merely to "enhance the built, historic, and natural environment of Durham City".

A sustainable transport strategy should have a clear objective to decrease in absolute terms the carbon emissions attributable to transport in Durham, which can most easily be achieved by enabling and encouraging a shift to existing sustainable modes.

Land use planning

We welcome the proposal that the user hierarchy from the *Manual for Streets* be adopted, putting consideration of pedestrians and cyclists ahead of public transport users, and motor traffic. The language of place and movement we find less helpful: local streets and paths have an important movement function for people cycling and walking, not just a strong 'place function'. The overall need is surely to minimise the dominance of motor traffic on all streets and roads. In residential streets this can be achieved by various techniques, but most importantly by eliminating through-routes for motor traffic. On distributor roads separate provision for cycling, motor traffic, and walking is required, with particular attention paid to safe and convenient negotiation of junctions.

Pages 19 to 21 refer to how good land use planning can encourage take-up of sustainable transport. This section is relatively light in recommending specific standards or policies which could help ensure good planning. Page 21 advocates permeable grid systems in preference to cul-de-sacs to allow direct routes for walkers and cyclists. The optimal street pattern, however, is 'filtered permeability' where a grid for walking and cycling is modified by point-closures to motor vehicles which stop up through routes for cars.

There is no critical evaluation of the current policies in place. Such an analysis would have been highly useful in preparing the ground for the new local plan. Page 19 mentions the possibility of major development proposals close to the heart of the city being used to fund and deliver new facilities for sustainable transport. We have already seen two of the largest city centre developments go to planning application in the last twelve months without securing any consequential improvements in sustainable transport provision. The Council should be identifying gaps in local planning policy, and should use the existing local policies together with the National Planning Policy Framework to push for better provision.

The 2014 Durham County Council *Parking and Accessibility Guidelines* are praised on page 20 for requiring that new developments encourage travel by more sustainable modes. The report fails to note that the requirement for cycle storage space at residential properties was dropped in these guidelines, and that the policy is confused in relation to parking requirements for Durham city centre, with two arbitrary and incompatible definitions of the city centre area being used in the document.

The revision of the parking guidelines was driven by a particularly strict interpretation of planning policy guidance from central government. When the previous guidance requiring local authorities to limit parking at residential properties was withdrawn, this did not require councils to set a minimum standard instead, as Durham County Council has done. The paper justifying the change failed to note evidence that limiting car parking at origin can be very successful in reducing car ownership and car use when it is combined with controlled parking zones, as is the case in central Durham.

Ideas such as car clubs are much easier to promote where car parking is limited. Without greater emphasis on controlling parking, and a stronger parking policy, it will not be possible to take up the recommendations in the report to reallocate road space to sustainable modes (page 41, column 1).

Later in the report, such as page 28, parking standards are covered, but it is again strange that the current policies are not assessed for their suitability.

City centre routes

The report rightly identifies on page 11 that there are multiple issues with routes close to and across the city centre. The absence of a coherent safe cycling network limits the journeys which are viable by bicycle. People cycling from their homes to work, education or shopping destinations close to the city centre might approach from any part of the city, be that Framwellgate Moor, Newton Hall, Gilesgate, Elvet, Mount Oswald or Neville's Cross. Likewise their destinations could be in the city centre, or any of the important sites close to it, such as Aykley Heads, the railway station, Freemans Reach, or the University's sites at Leazes Road and Mountjoy. Unless all these origins and destinations are connected by convenient, safe routes, the full potential of cycling in Durham will not be realised.

It is therefore regrettable that the Council and its consultants have stepped back from identifying some of the measures which are clearly necessary to achieve such connections.

On page 32, the report talks of redirecting the NCN route 14 via Framwellgate Bridge, Silver Street and the Market Square. We would very much support the idea of reopening this route for cycling, outside peak shopping hours. In the January draft of the report shared with stakeholders, this was followed by a specific proposal: "a contra-flow cycle lane will also need to be provided in the westbound direction on North Road to enable cyclists to overcome the one-way restriction on traffic". In the current version we have instead a statement that "providing a direct route agreeable to all stakeholders is more problematic".

The map on page 33 shows a dashed green line running from the west end of Framwellgate Bridge across Neville Street, New Street and Atherton Street to the bottom end of Flass Street where it meets the NCN route 14, with the legend "direct cycle route options to be identified". This masks the fact that the real destinations, for people cycling from Framwellgate Bridge, will be up North Road to areas such as North End, up Crossgate, or up South Street. While NCN route 14 might exist on paper, and will be followed with bemusement by long-distance leisure cyclists, local people will hardly ever attempt Flass Street and Redhills Lane by bike – it is so steep that some prefer to wheel their bikes even in the downhill direction.

For people travelling to destinations such as North End, Framwellgate Moor, or towards Sacriston, the best route is easy to identify, and is along North Road itself. An alternative would either involve the steep climb of Crossgate, or a detour via the bus-dominated environment of Milburngate and the hill via Castle Chare or the A690. The alternatives to North Road are simply not going to be acceptable for cycling.

The main difficulty in providing a contraflow lane is clearly the long taxi rank, where for much

of the day ten or more taxis will be parked. Given the plans to repave North Road in the near future, this issue should be discussed openly with stakeholders as a matter of urgency. The strategy quite rightly places walking and cycling at the top of the transport hierarchy for the city. An outcome which denies a basic network for cycling is contrary to the aims of the strategy. It should surely be possible to locate a taxi rank somewhere else on North Road. It has only been in its present location a few years. The current, long taxi rank also detracts from the shopping environment. There must be technological measures, such as apps, sensors or CCTV, which would enable more of the taxis to wait elsewhere rather than on what should be a prime retail street, and still respond promptly to passengers.

The strategy seems overly focussed on NCN route 14, which, it has to be remembered, was primarily conceived as part of a long-distance leisure route. The report's main suggestion for the city centre seems to be the proposal to reroute via Silver Street. The full extent of the problems for cycling to or from the city centre have not been identified. To illustrate this, we quote from page 34 a strange comment relating to a proposal to redirect NCN route 14 via Potters Bank, Prebends Bridge and the Bailey:

While providing an alternative route for leisure cyclists ... this route does not provide for direct access to and across the city centre for utility cyclists, and would therefore be a complement, rather than an alternative, to use of Framwellgate Bridge.

In truth, the suitability depends on the origin or destination. Those cycling from Western Hill, North End and Framwellgate Moor will need to travel across Framwellgate Bridge, but people cycling from Langley Moor and the south-west such as Brandon, or the new estate at Mount Oswald, will find the Prebends Bridge route very convenient for crossing the city centre.

The focus on the existing numbered NCN route perhaps explains the authors' blindness to other issues. For example, cycle access across the original Elvet Bridge (potentially without time restriction) would also be highly useful for getting to/from the Elvet area, a significant area of housing, businesses and university locations. This idea is omitted from the map on p. 33. The present arrangements, and those proposed by the Council in conjunction with the SCOOT work at Leazes Bowl roundabout, are flawed. The excellent rural route from Newton Hall to the town centre via Frankland Farm, while not blessed with a Sustrans numbering, comes to an end at Framwellgate Waterside with no obvious onward route. Other routes from Framwellgate Bridge, namely South Street, Crossgate and Allergate, are all one-way for cycling, limiting journey possibilities.

Accordingly, we argue that an important first step in realising a sustainable transport strategy should be to identify a core city-centre cycle network, which connects the main radial routes leading to the city centre. These should be assessed to identify short-term measures for improvment as well as safeguarding them for strategic upgrades over the course of the plan.

This work should be completed before any further planned alterations in the city centre road network, to ensure opportunities are not missed.

With the core city-centre network upgraded, attention could then shift to a programme of whole-route upgrades, creating high-quality radial routes to each suburb in turn.

Trust Pathways members would be happy to work with the Council to provide local knowledge, which is much needed.

Northern Relief Road

One of the least convincing sections of the document concerns the long term strategy for infrastructure, found on pages 34 to 37, which includes discussion of the proposed northern

relief road.

In the aborted County Plan, it was suggested that provision of a northern relief road might allow for reallocation of city-centre roadspace to sustainable modes, but this was left as a vague aspiration. The present report includes a strong recommendation, given in bold italic type on page 35, that the northern relief route should

only be provided to enable significant reallocation of road space to pedestrians, cyclists, and buses within the city centre.

The fact that this statement is given such typographic emphasis is significant: it is the only statement in the whole report given additional emphasis in this way. It recognises the danger of additional traffic being generated through the provision of extra road space.

The statement has a number of corollaries. If road space reallocation in the city centre is not necessary, or can be achieved without the need for a relief road, then that relief road should not be built. Further, if the likely users of the proposed new road are not to a large extent the same as the users of the road space which will be reallocated, then again, the road is not justified.

In our opinion the strategy document has demonstrated neither of these prerequisites: in fact it is very unclear about what road space reallocation is envisaged, other than providing dedicated cycling provision across the Milburngate Bridge by reducing the motor traffic lanes from four to two. Without a plan for how this would link in with a cycle network across the city, it is impossible to judge the need for this measure. It is admitted on page 34 that dedicated provision for buses can not be provided on this bridge. Instead improvements will accrue, it is claimed, from the reduction overall in traffic levels across the bridge. Improvements for pedestrians would, we assume, follow from the reduction in traffic levels, allowing easier crossing of the A690.

Starting from the need to improve sustainable transport possibilities in the city, it is far from clear that an independent consultant would have suggested a northern relief road if that proposal had not already been brought forward as part of a previous structure plan. The case has certainly not been demonstrated satisfactorily by the current document.

On page 35 the report mentions the idea of a segregated cycle route alongside the new road, complementary to a route across the former Belmont railway viaduct. Why not get on and build the railway viaduct route straight away, and provide a real advantage for sustainable transport? This could not only remove some motor traffic from the city centre, but would convert journeys to a sustainable mode.

Similarly, cycle routes from Gilesgate Moor, Carrville and Belmont to the city centre and the Durham University Mountjoy campus could be provided by extending the route via Bent House Lane through Old Durham and across the Wear by Maiden Castle. The opening of a cycle route from the centre of Oxford across the fields to the suburb of Marston in the 1990s encouraged sustainable transport by giving cyclists and pedestrians a shorter and more pleasant route into the city, and took cyclists off a dangerous roundabout at the east end of Magdalen Bridge. A route via Old Durham could be equally successful.

Investment across the city

We are broadly in agreement with the issues identified on pages 39–43 and appendix A. The section on the "University to the city centre" (pages 39–41) gives some cause for concern. The New Elvet – Church Street – South Road axis is a key route linking university buildings, but is currently inhospitable for cycling – indeed a university lecturer was seriously injured while cycling on New Elvet in November. The route was the subject of a site visit in December

involving representatives of the council, the university and Trust Pathways. We were hopeful that improvements for cycling would be identified. Since that site visit, it feels as though the council has gradually withdrawn from engagement on the issues. Furthermore, since an earlier draft of this strategy was circulated in January, an introductory paragraph has been added to the section, which concludes with the statement:

The strategy within this corridor will be to improve conditions for pedestrians.

Reiterating our comments about the city centre routes, a first step must be to record this route as being of strategic importance for cycling as well as walking, and ensure that any proposed improvements are devised in a way which also enables cycling by people of all ages and abilities. For example, page 39 notes the inadequate pedestrian waiting areas at the New Inn junction. There are also no facilities for cycling, and no obvious access to the shared-use paths within the university campus. A balanced solution might increase the frequency of the pedestrian phases at this junction, thereby avoiding a build-up of pedestrians waiting to cross, rather than taking away road space which could have been reallocated to cycling.

Page 41 states that local residents and businesses should be consulted on any plans. There should also be consultation at the very earliest stages with cycling groups such as the Trust Pathways.

Supporting measures

Instead of the unsubstantiated proposals relating to the relief road, the strategy should make much more of what can be done in the medium term to improve sustainable transport, and how progress should be measured. Generally in the UK it is found that a high proportion of shorter journeys are made by car. Often public transport has difficulty competing with the car if free parking is readily available. Another difficulty for buses is the type of journey where a parent needs first to drop off a child at school and then continue to the workplace. Short trips such as essential shopping on the way back from work, are often much more convenient by car than bus.

Cycling is a cheap mode of transport, which allows people to undertake similarly complex journeys of a length three to four times those which people might consider walking. Journey times are more reliable than by car, and cycling involves healthy exercise. To allow cycling to play a full part as a serious mode of transport, the infrastructure is crucial. If continuous, safe and convenient infrastructure is provided, then cycling can be accessible to all users, including children and young people.

Sadly the strategy does not stipulate the level of quality required to enable mass cycling. Indeed, measures such as Advanced Stop Lines are advocated (page 46). These are rarely found in countries such as the Netherlands. They do little to improve safety and have been implicated in cycling casualties – the 'cycle box' of an ASL is very similar to the forward blind spot of HGVs. It is true that Durham has few ASLs at present, but this is more an indication that the council has been neglecting cycling over many years, and has generally avoided interventions that might in any way restrict car capacity.

On page 42 the report mentions the need for "adequate cycle priority (and protection for cyclists)" at junctions such as the Sniperley roundabout. Again, this is not defined, and there is a risk that the County Council's interpretation of what is adequate will be poor quality. We would urge that the council heed the 2014 report by Transport Initiatives which recommended signalised crossings triggered by detection of cyclists approaching the crossing, thereby minimising delay for people choosing to cycle and thus genuinely prioritising cycling.

The report basically does not recognise the fundamental need for better infrastructure. On page

45 it is stated that

The strategy for cycling should include a wide range of measures to increase cycling levels across Durham City, including investment in safe, continuous routes for cyclists.

This statement ought to be much stronger: without better infrastructure there is no point doing the promotional work suggested in the short-term "smarter choices" strategy.

Monitoring and evaluation

The strategy is weak when it comes to targets for modal share. The targets on page 53 generally bundle public transport, cycling and walking together, which is unhelpful as these modes each start from a different base. Walking is already relatively popular in Durham, for example, whereas cycling is far from showing its full potential at present. The government's Cycling and Walking Investment Strategy aims to double cycling trips nationally by 2025 (a target widely regarded as unambitious by comparison with other countries in northern Europe) so the strategy should at least aim for a 100% increase by 2025 and certainly a larger increase by 2033. Indeed, you would expect most of the increase in cycling trips to occur in urban areas, so an increase in cycling to something like 10% of trips within the city is more realistic as an objective.

Conclusion

Durham County Council has adopted a number of excellent policies and strategies over the years, including LTP3 and the County Durham Cycling Strategy 2012–2015. Where they fall down is in lack of ambition and specificity on timescales, quality, and targets. This strategy is no exception.

The report sets out many good arguments in favour of sustainable transport, along with some useful case studies, but is weaker when it comes to defining what needs to be done. To implement this strategy Council must move swiftly to producing and adopting more practical documents, such as a cycle network plan. Culture change within the Council – its officers and councillors – will be required, with staff resource being refocussed on areas of activity which will support the strategy, rather than continuing the status quo. Maintaining a high level of engagement with stakeholders will be crucial.

Yours faithfully,

Matthew Phillips