Please find attached letter & Encl from , Director of Strategic Planning DfI, for your attention.

Kind regards.

, Personal Secretary for , Director, Strategic Planning Directorate
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Department for Infrastructure
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Transport Planning and Modelling Unit

Transport Policy Directorate

Oct 2020

INTRODUCTION

i. Thank you for the opportunity to comment on the re-consultation of your draft Plan Strategy (dPS). We look forward to our continued collaboration with your office to deliver sustainable infrastructure that will transform communities in the North West. For ease of reference changes to our previous consultation response is shown in green.

ii. It is important to acknowledge that your Local Development Plan is being produced in the context of the severe impacts related to COVID-19. These have been deep and far reaching for all aspects of our society. As we look towards the future the Minister has stated her commitment to seize the opportunities to enable a greener, cleaner, recovery towards a new and better normal for all.

iii. Transportation Planning and Modelling Unit (TPMU) have prepared comments on your Draft Plan Strategy (dPS) based upon the DfI Guidance on the preparation of LDP policies for transport. The majority of the comments refer to the integration of land use and transportation and this issue is dealt with in various sections through the DPS including: the Overall Strategy; other Strategies, Designations and Policies; and in the Place-Making ad Design Vision.

iv. The remainder of the comments have been structured and numbered using the headings from the DfI Guidance and are dealt with in Chapter 11 entitled Transport and Movement:

2. Active Travel Networks
3. Park & Share and Park & Ride
4. Creating and Accessible Environment
7. Safeguarding new transport schemes
8. Disused Transport Routes
9. Transport Assessments & Travel Plans

10. Walking & Cycling Provision

11. Provision of public and private car parks

Dfl TPMU consider that the content of the DPS is generally sound although the following issues are not entirely compliant with Test C3.

1. Integration of land use and transportation

General Comments

i. The integration of land use and transportation should be a key element of the Draft Plan Strategy which advances strategic proposals regarding the location of development.

ii. In particular, the Dfl's proposed best practice policy approach: "Accessibility Analyses should be employed to assist in the identification of appropriate development sites where integration with public transport, cycling walking and the responsible use of the private car can be best achieved" would be expected to appear prominently in the document.

iii. Whilst there are numerous references to accessibility or similar throughout the document, the language is inconsistent and hence the meaning is not clear. By way of assistance Dfl provide the following clarification to distinguish between transport accessibility and physical accessibility.

> ***Transport accessibility analysis*** *is a long established concept in integrating land-use and transport planning. In this context, accessibility relates to the ease of access of essential services. Hence it is concerned with travel time between a location of interest (for example a proposed residential zoning) and the particular service (for example food shopping). Accessibility can be considered by different modes of transport, for example walking, cycling, public transport or car.*

*Accessibility, in this context, differs from the consideration of the **physical accessibility** of the mode of transport or the design of a building or place. These involve making the mode, building or place usable by people with common impairments (visual, mobility, etc) and may include adaptations like those required for buses and coaches as detailed in the Public Service Vehicle Accessibility Regulations (Northern Ireland) 2003, Development Management Practice Note 12 – Design and Access Statements or those outlined for residential developments in the Planning Design Guide - Creating Places.*

Chapter 6: Spatial Strategy and Settlement Strategy

i. It would be useful to refer specifically to transport accessibility by public transport. In particular Designation SETT 1 (page 58) should include reference to public transport travel times to Derry City Centre, see map provided by DfI at Annex 1. It is not suggested that the classifications should necessarily be altered, however the transport accessibility differences should be noted. This approach would be consistent with Settlement Hierarchy – Related Infrastructure provided at Table 7 (page 62). It is not clear whether checks have been made regarding the existence of bus services as per the table.

ii. The reference at para 6.35 (page 68) to the use of "spatial accessibility evidence gathered through the North-West Transport Study and the Spatial Analysis contained within the PlaceMaking & Settlement Study" suggests that the LDP will indeed take account of transport accessibility in the designation of zonings but the language is unclear, see also Housing comments.

iii. Figure 10: Strategic Development of Derry-Londonderry City (page 69) is unclear insofar as there is limited explanation as to how the locations of the "Main Housing Locations" and "Main Economic Development Locations" have been chosen. Whilst this may be due to "existing housing commitments" and "Special" and "New Economic Development Areas", this is currently unclear. As a result it is not apparent how the land use decisions are integrated with existing sustainable transport.

iv. Para 6.38 (page 69) also refers to "Density Bands". The Department would wish these "Density Bands" to be related to level of public transport, cycling and walking provision and accessibility to key services.

v. Para 6.41 (page70) refers to transport and movement. The statement "There will be a focus on improving accessibility for public transport, walking and cycling in the city" is unclear and perhaps should be simply re-worded by substituting "infrastructure" for "accessibility". The reference to "re-modelling of existing roads" and the "possible orbital routes" are noted.

Chapter 7: General Development Principles & Policies

i. GDP1 Sustainable Development (box, page 74) is welcomed especially requirement iii however the Department would wish the term "where possible" to be removed and "and public transport" to be added after "active travel". Requirement v should include reference to public transport.

ii. GDP2 Climate Change (box page 76) is welcomed especially items i and viii which relate to location and siting and item iv which relates to sustainable travel options. Item iv should be reworded along the lines of "facilitating sustainable travel by improving active travel infrastructure and public transport options in preference to the private car;".

iii. It is noted that the GDP2 (and GDP3) will require development proposals to **demonstrate** adherence to required items. This demonstration is fundamental to the principle of sustainable development and it will therefore be important that objectivity and proportionality is applied. This may be difficult to achieve in practice and may take time to build up precedents.

iv. GDP3 Improving Health and Well-Being (box page 78) is welcomed especially items i, ii and v. It is noted that the wording "encourage active travel and how they are facilitating travel by public transport in preference to private car" is stronger than in GPD2 but consistent use of wording such as "facilitating sustainable travel by improving active travel infrastructure and public transport options in preference to the private car;" is preferred.

v. Paras 7.24 and 7.25 (p79) refer to "high levels of connectivity and accessibility" but is not clear whether accessibility refers to transport accessibility as per accessibility analysis or physical accessibility as described above.

vi. GDP4 Supporting Sustainable Economic Growth (box page 82) is welcomed especially item ii. It is suggested that item ii should be re-worded to improve understanding along the lines of: "they are suitably located with active travel infrastructure and public transport options which encourage use in preference to private car".

vii. GDP5 Creating and Enhancing Shared Space (box page 83) is welcomed especially item iv. Whilst item iv is effectively expanded in para 7.37 (page 84) 2nd bullet, it is suggested that attractive walking and cycling linkages are mentioned explicitly in item iv. It is also suggested that the item i is reworded along the lines of "have physical design features that makes them accessible to all".

viii. Implementation of General Development Principles (box page 88). The Department would wish to see an additional item included along the lines of "the zonings and phasing confirmed in the Local Policies Plan of the LDP".

ix. The Pilot Resilient Settlement outlined in paras 7.53 – 7.57 (page 90) is welcomed. It is suggested that the sentence, "The project would also ideally be close to public transport nodes." in para 7.57 should be moved to para 7.56 to replace the penultimate sentence, "The excellent .....public transport" and reworded along the lines of: "The project would be suitably located and provided with convenient and attractive cycling and bus access to the major public transport nodes in Derry City Centre."

x. GDPOL 1 General Development Management Policy (box page 93) item x "the proposal meets the relevant requirements as set out in the Transport Chapter" is welcomed.

xi. Para 7.87 (page 97) refers to Air Quality Management Areas. It is not fully clear how or if the bullet points have been taken account of in any of the proposed development locations identified in the document.

xii. GDPOL 2 Design Policy in Settlements (box page 104) is welcomed especially item iv expanded at para 7.137 (page 107) and item vii expanded at para 7.140 (page 107). It is suggested that the term "permeability" as used in para 7.137 is included in item iv. It is also suggested that item vi uses identical words to GDP 5 item i.

Chapter 9: Economic Development

i. ED1 General Criteria for Economic Development (box page 117). It is not totally clear under ED1 whether ED 2 – ED 7 also apply to any proposal. Items (f), (g) and (h) are relevant and welcome for transport considerations. However under item (g) it is not clear exactly what a "movement pattern" is – ie is this an estimate of exactly how people will travel to and from the development or is it a physical plan including a commitment to infrastructure? In any event, the words "insofar as possible" and "adequate" should be removed. In addition, it is not immediately clear whether GDPOL 1 applies and consequently whether there is a need for Transport Assessment (as noted in TAM 6, box page 168).

ii. Throughout the chapter, and within the specific Economic Development policies, there is no reference to location and transport accessibility which are critical for sustainable development.

Chapter 10: City / Town Centres, Retailing, Offices, Leisure and Other Uses

i. RP1 Town Centre First (box page 131). 4th item, "- Out of centre locations that are or can be made accessible by a choice of public transport modes" should be rewritten as follows: "- Out of centre locations that are or will be made accessible from their residential catchments by a choice of walk, cycle and public transport".

ii. Para 10.10 (page 131) should be explicit as to what is meant by "normal planning criteria including transportation and access arrangements".

iii. Paras 10.11 – 10.18 (page 132) which expand on RP 1 should provide explicit reference to the importance of transport accessibility analyses.

iv. RP9 Out of Centre Development (box page 141) item 4 should be reworded from "...the site is or can be made easily accessible by a choice of transport modes....." to "...the site is or will be made accessible from its residential catchments by a choice of walk, cycle and public transport...."

v. RP9 Out of Centre Development (box page 141) item 4 included the words "and will reduce the length and overall number of shopping trips by car". It is assumed that the estimate of shopping trips will be compatible with the retail impact assessment and transport assessment and will be provided with each assessment for scrutiny by DfI as a statutory consultee.

Chapter 15: Agriculture & Other Development in the Countryside (pages 211 – 217)

i. It could be made clearer that GDPOL 1 applies to developments in this section and hence the relevant requirements in the Transport Chapter apply including TAM 6 Transport Assessment and TAM 7 Walking & Cycling Provision.

Chapter 16: Housing in Settlements and in the Countryside

i. Table 8 (page 221). DfI is concerned by the high percentage of new housing allocated to the Countryside, see also para 16.121 (page 256).

ii. Para 16.10 refers to Test 3. Transport Test (page 221) however it is unclear if or how this test has been applied as there is no reference to bus services in Table 2 in Appendix 5.

iii. Para 16.14, items c. and d. (page 223). The term "sustainable, accessible and central locations" should be explained fully.

iv. Para 16.16 (box page 224) the final sentence should be amended to read "The LDP aim is to deliver 9,000 new, quality homes by 2032 at sustainable locations that are accessible by walk, cycle and public transport to employment, shopping, community services, leisure and recreational facilities."

v. Policy HOU 1 (box page 225). It is essential that the process for identifying Selected Urban Capacity Sites takes full account of accessibility by walk, cycle and public transport. This is outlined in Para 16.22 (page 227) and welcomed but ideally should include specific reference to walk, cycle and public transport.

vi. Policy HOU 2 (box page 229). It is strongly recommended that the wording of Item b. should be consistent with previous wording, eg para 16.16 "the location is accessible by walk, cycle and public transport to key services and facilities."

vii. Policy HOU 3 (box page 230) and paras 16.38 – 16.40 (page 231). The use of terminology "key and link transport corridors including arterial routes" would require formal designation at LPP stage. However, in any event these locations should be designated on the basis of Accessibility Analyses by walk, cycle and public transport.

viii. Policy HOU 8 Quality in New Residential Developments (box page 241). As noted under item (f) it is not clear exactly what a "movement pattern" is – ie is this an estimate of exactly how people will travel to and from the development or is it a physical plan including a commitment to infrastructure?

DfI would require a commitment to physical walking and cycling infrastructure and potentially new bus services.

ix. Para 16.121 (page 256) explicitly commits to up to 1,400 homes in the countryside. DfI consider this to be a substantial figure which can only add to traffic congestion, carbon dioxide and air quality problems and should be reduced. (On the assumption that 50% of homes will undertake a daily car journey to Derry City in the morning peak, this will require up to 700 park and ride spaces and 10 buses or add a combined queue length of approximately 3.5km on roads entering the city.)

Chapter 17: Open Space, Sport and Outdoor Recreation

i. Para 17.7 Open Space Strategy (box page 279). Item 4. should amend "where appropriate, connect" to "be located with connections".

ii. OS 3 Green and Blue Infrastructure (box page 289). 1st bullet should exclude the phrase "where opportunities arise".

iii. OS 4 Outdoor Sport and Recreation in the Countryside (box page 290). Item (vii) - the phrase "as far as possible" is broadly welcomed as stronger than "where practical" or "as appropriate". However it is noted that it is open to interpretation.

iv. OS 5 Intensive Sports Facilities (box page 292). Criteria bullet 5 should replace the phrase "giving priority to" with "by".

Chapter 18: Community Infrastructure

i. CI 1 (box page 299). Criteria bullet 2 should replace "where available" with "where possible".

Chapter 26: Place-making & Design Vision

i. Place-making & Design Objectives (PDOs) (box page 401). DfI welcomes PDO 3) To Implement a Sustainable Transport Hierarchy.

ii. Para 26.18 PDP 7 Implement a Sustainable Transport Hierarchy (page 403). DfI welcomes the statement that car-based development should be discouraged. This effectively supports the application of Accessibility Analyses and the planning and provision of walk and cycle infrastructure.

iii. Para 26.19 PDP 8 Create Walkable Settlements (page 403). DfI welcomes the statement that development locations should be within an 800 metre walk of existing key services and to repair the development patterns of previous plans. This effectively supports the application of Accessibility Analyses and the planning and provision of walk and cycle infrastructure.

iv. Para 26.20 PDP 9 Make Places for People (page 403). DfI welcomes the statement that streets should be easy to cross and use by all. This supports the careful confirmation of the mixed functions of a road link in urban environments and the integrated planning and provision of walk and cycle infrastructure.

v. Para 26.22 PDP 10 Sustainable Densities & Town centre Living (page 404). DfI welcomes the final sentence in particular - this restates the linkage between accessibility by sustainable modes and development density.

Chapter 27: Place-making & Design Vision / Policy for Derry – Londonderry

i. DSDP 2 Sustainable Connectivity for the City (box page 412). DfI welcomes this Policy which requires city centre development proposals to demonstrate on and off-site infrastructure to maximise use of sustainable modes. This clearly links with TAM 6 which is concerned with Transport Assessment.

ii. DSDP 4 Riverfront (box page 416). DfI welcomes this Policy and in particular notes the statement "Where opportunities arise through development schemes and it is demonstrated to be feasible, the LDP will support the rationalisation of dominant transport infrastructure, such as dual carriageways along the riverfront." DfI suggest that the feasibility should take account of economic, environmental and social objectives in addition to engineering and financial practicalities. In effect this is dealt with in para 27.23 (page 417).

iii. DSDP 5 Inner Historic Core (box page 418). DfI notes this policy and the consideration to be given to creation of additional public spaces at Queen's Quay Roundabout and Foyleside Roundabout at the LPP stage.

iv. DSDP 6 Outer Historic Core (box page 419). DfI notes the suggestion that development proposals should consider reductions in the volume of traffic and stationary vehicles.

v. DSDP 8 Outer Strand Road & Western Slopes (box page 421). DfI notes the suggestion that development proposals should consider protection of existing links for pedestrians and cyclists, and where opportunities arise, to form new links. DfI suggest that the recommendations for Pennyburn Roundabout (para 27.34 page 421) interact with the proposal for a New Economic Development Area at Buncrana Road (box page 117).

Chapter 28: Place-making & Design Vision / Policy for Strabane

i. SSDP3 3 Connection (box page 428) is welcomed by DfI especially with relation to developer contribution. You may wish to reference the forthcoming NWTP and Car Parking Strategy.

ii. SSDP 5 Create Key Public Spaces (box page 429) and in particular the requirement to "consider the reduction of the volume of traffic and stationary vehicles" is noted by the Department.

Chapter 40: Monitoring Criteria and Review Process

i. Technical Paper – Monitoring and Review Report EVB 40, 4.0 Indicative Monitoring Framework Table, Topic Area 8. Transport and Movement. DfI suggest that the proposed use of the Travel Survey of Northern Ireland to will not be sufficiently detailed to monitor year on year change in the number of people travelling by sustainable modes.

CHAPTER 11 TRANSPORT AND MOVEMENT

2. **Active Travel Networks**

i. A commitment or direct reference to the DfI's best practice policy approach "LDPs should identify active travel networks and provide a range of infrastructure improvements to increase use of more sustainable modes. In particular, within urban areas, providing enhanced priority to pedestrians, cyclists and public transport and an acceptable level of parking provision which is properly managed" appears missing from the document. This requirement to identify active travel networks, ie effectively plan them, is additional to TAM 7 Walking & Cycling Provision (page 169).

3. **Park & Share and Park & Ride**

i. DfI is content that this matter is covered satisfactorily under TAM 8 (box page 171).

4. **Creating an Accessible Environment**

ii. DfI is content that this matter is covered satisfactorily under TAM 1 (box page 158).

iii. Please be aware draft DCAN 11, Access for all – Designing for an Accessible Environment, has been withdrawn by the Department. Development

Management Practice Note 12 provides advice on access arrangements for people with disabilities in line with current legislative requirements.

5. Safeguarding new transport schemes

i. DfI is content that this matter can be covered satisfactorily under TAM 4 (box page 166) by adding reference to the forthcoming North West Transport Plan to be prepared in conjunction with the LDP Local Policies Plan.

6. Disused Transport Routes

i. DfI is content that this matter is covered satisfactorily under TAM 5 (box page 167).

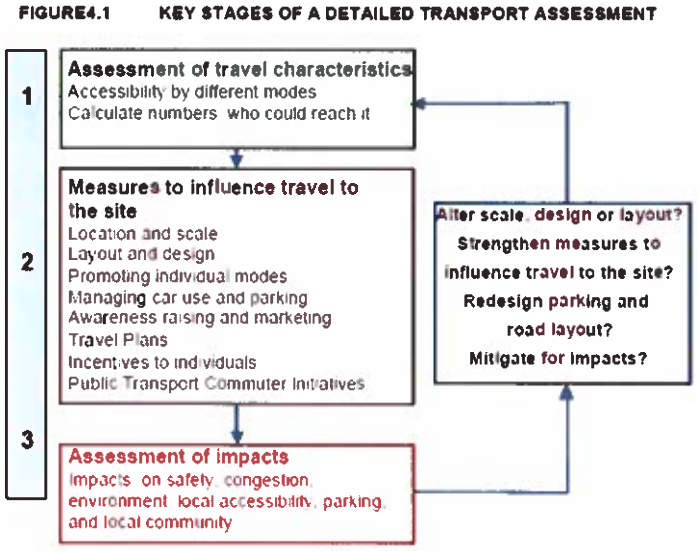
ii. At paragraph 11.82 it is assumed that the reference to the NWTS should be the forthcoming NWTP.

7. Transport Assessments & Travel Plans

i. DfI notes that this is covered by TAM 6 (box page 168). DfI would prefer to see the reference to Transport Assessment noted under a general provision covering all themes. Alternatively DfI suggest it should appear at the front of the Transport theme section with supporting text to explain that it applies to all forms of development that generate a significant travel volume and/or impact.

ii. Additionally DfI would like the supporting text to make clear that a primary aim of the Transport Assessment is firstly to assess accessibility by sustainable modes and to develop measures to maximise use of sustainable modes – only subsequently should the residual traffic be assessed and its impacts ameliorated, see Figure 1, below.

Figure 1 Extracted from: Transport Assessment Guidelines for Development Proposals in NI



8. Walking & Cycling Provision

i. DfI is content that this matter is covered satisfactorily under TAM 7 (box page 169).

9. Provision of public and private car parks

ii. DfI is content that this matter is covered satisfactorily under TAM 8 (box page 171).

iii. In paragraph 11.98 it is assumed the reference to on street parking should refer to the Department.

iv. Policy TAM 9 Car Parking and Servicing (page 174)

a. It is assumed the reference to the NWTS and the Council's Car Parking Study should refer to the forthcoming NTWP and the Council's Car Parking Strategy.

b. The policy has a focus on Derry City and the text should be revisited to ensure that it covers other areas, such as Strabane.

Chapter 11 - Other Comments

Dfi is concerned that the detailed wording in the Draft Plan Strategy misrepresents the contents of the Draft North West Transport Study. In particular:

i. ~~LTS Transport Measures (box page 147) – remove "Derry Glider" as this implies a full Bus Rapid Transit specification~~ The draft transport objectives and measures of the NWTS should be recorded verbatim in the dPS. We acknowledge that there will be areas outside the Transport Study and Transport Plan that the Council (and/or the Department/other stakeholders) may wish to explore and the dPS should make this distinction clear. The Department will, of course, continue to engage with the Council on these issues.

ii. Para 11.6 page 148 includes "The Council will also facilitate enhanced rural business opportunities as provided by the LDP PS to enable those seeking to set up an appropriately scaled business in the countryside under ED5." The relevance of this statement in this section is unclear.

iii. Para 11.8 (page 149) sentence could usefully be moved to follow immediately after the heading "Main Transport Challenges for the City and District" (page 148).

iv. Para 11.11 Council's LDP Strategy (box, page 149) is welcomed. However DfI suggest that the explicit reference and support for "delivery drones" is deleted until there is greater knowledge of the practicality and knock-on consequences of this innovative mode of transport.

v. Para 11.20 (page 151) is noted. It is suggested that the following should be added to the final sentence "whilst also improving local connectivity and access to the proposed New Economic Development Area."

vi. Strategic Objectives for Car Parking in Derry City and Strabane (box page 154) is welcomed however at para 11.32 (page 154) DfI wish the phrase "and not take place until alternatives .....are in place" to be removed. DfI wish the following sentence to be inserted before the last sentence: "The Council and DfI will prepare car parking strategies in line with the SPSS requirements."

vii. Para 11.39 (page 156) is noted. However, in the last sentence, the phrase "examine the feasibility for all the previously mentioned orbital routes as these will be essential to" should be changed to "assess the previously mentioned orbital routes against economic, environmental and social objectives as these routes may be advantageous in". It is also assumed that the NWTS and Car Parking Study should be the forthcoming NWTP and Car Parking Strategy.

viii. Paragraph 11.43 (page 157), it is presumed that the 'NWTS' should read 'forthcoming NWTP'.

DfI is concerned that, whilst the principle of integration of land-use and transport planning is mentioned a number of times in the explanatory text, the actions to be taken are unclear.

ix. Para 11.10 (page 149) is overly explicit but incomplete. It is suggested that it should be rewritten along the lines of:

"It is stressed that the LDP can only deliver those transport and movement related policies and designation over the life of the LDP period that are within its Planning remit. Nevertheless it is recognised that the selection of zonings and developments whose locations are accessible to their catchments by walk, cycle and public transport.

x. Para 11.35 (page 154) As noted earlier it is unclear whether public transport services have been taken into account in allocating housing provision to rural settlements.

xi. Para 11.37 (page 155) is welcomed but should mention Accessibility Analyses explicitly.

xii. Para 11.42 (page 157) is welcomed. However, accordingly "Strategic Planning Objectives for Delivery of Transport Strategy and Measures" (box page 157) should be re-entitled

"Strategic Planning Objectives for the Integration of Land-use Planning and the Delivery of Transport Strategy and Measures". In addition a new first bullet should be inserted which gives an undertaking that accessibility analyses by active travel modes and public transport will be used to influence the choice of zonings and major developments at the LPP stage. Also the last bullet should be extended to include the phase "and public transport, by providing appropriate infrastructure or support for services".

ANNEX 1 Accessibility Analyses – Public Transport Travel Times AM Weekday