

Chloe Duddy

From: [REDACTED]
Sent: 27 January 2020 15:31
To: Local Development Plan; Local Development Plan
Subject: LDP Response - Transport
Attachments: LDP response from former member of Ilex Regeneration Transport & Infrastructure SWG mamber.docx

Dear Sir/Madam,

As former member of the ILEX Regeneration Transport & Infrastructure SWG, Foyle & District Road Safety Committee and member of Into the West Rail Lobby Group I submit the attached Response to the Local Development Plan

Sincerely

Mary Casey
[REDACTED]



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27 JAN 2020

LDP Response from former member of ILEX ³⁶Regeneration Plan Transport & Infrastructure Strategic Working Group, former member of Foyle & District Road Safety Committee and member of Into the West Rail Lobby Group - Mary Casey

The Local Development Plan states that 'The Travel Survey for Northern Ireland Report 2015-2017 contends that the most common mode of transport was by private car accounting for 61% of the total. Only 5% of journeys were taken by all the public transport combined, while 28% of journeys were carried out on foot and 1% on bicycle.'

The LDP also states that the 'A2 Buncrana Road which has a planned upgrade to four lane road from central Derry to the border at Bridgend, to improve transport infrastructure as part of the TEN-T network (Trans-European Transport Network). Further planned upgrade of this N13 route, possibly including a Bridgend By-pass, will improve connectivity of Derry to Letterkenny and onwards to the N15 Atlantic Economic Corridor, and vice versa linking Letterkenny to the A6 and onwards.' And that 'Recent joint studies by Donegal County Council and DCSDC have identified the realistic yet ambitious pathway to growth of the region over the next 15 years, particularly with:extensive investment in infrastructure including the A5 and A6 dual carriageways, plus A2 Buncrana Road upgrade.'

The Local Development Plan states 'Council is a responsible organisation, taking a civic lead through all its services delivery (where practicable currently) in promoting sustainable development, adapting to climate change.'

Does the LDP not identify the need to provide additional Park and Ride locations and extension of the rail connection to Letterkenny as essential rather than a 'potential' if the Council is serious about reducing traffic congestion, developing a modal shift away from the car and addressing climate change?

The Local Development Plan states that 'The Northern Ireland Executive's 'Everyone's Involved – Sustainable Development Strategy, (May 2010) aims to put in place economic, social, and environmental measures to ensure that we can continue to grow our economy, improve our society and communities and utilise our natural resources in an environmentally sustainable manner.' In a time of increased knowledge and experience of climate change - Why is there no inclusion for dedicated bus lanes, additional (rather than 'potential') Park & Ride locations and only 'may be feasibility testing of the extension of the rail network into Donegal'? This question must be asked when as the LDP states 'The 2011 Act requires Council to undertake an appraisal of sustainability for both the Plan Strategy and the Local Policies Plan respectively. As the Sustainability Appraisal (SA) for each of these development plan documents will incorporate an assessment of environmental effects, it must also comply with the requirements of the European Directive 2001/42/EC on the Assessment of Effects of Certain Plans and Programmes on the Environment (SEA Directive) The SEA Directive was transposed into Northern Ireland legislation through the Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004 (the EAPP (NI) Regulations' and since the Plan states that it places 'Sustainable development will be at the heart of the LDP.'

Published in March 2012, 'Ensuring a Sustainable Transport Future. A new approach to Regional Transport' sets out the approach to regional transportation and guides strategic investment decisions. It complements the RDS 2035 and contains high level aims and strategic objectives to support the growth of the economy, enhance the quality of life for all and reduce the environmental impact of transport. The Local Development Plan states that its 'Environment focussed objectives:: To improve connectivity between and within settlements and their rural hinterland through accommodating investment in transportation to improve travel times, alleviate congestion and improve safety for both commercial and private transport.'

Why in the above has extension of the rail network to Letterkenny not been a priority since I have no doubt that it would be eligible for TEN-T funding by Derry Strabane District Council and Donegal County Council? Our Into the West Rail Lobby Group in our Western Rail Alliance has met with Irish Government Ministers and with Donegal County Council Officers lobbying for a rail extension to Letterkenny.

The Local Development Plan states also that it seeks 'To contribute towards a 'modal shift' away from dependence on private cars and minimising traffic-generation, enabling 'places for people', relying more on improved public transport services and achieve the more efficient integration of land use and transportation. Planning for new developments in locations well served by public transport will provide more accessibility to sustainable choices of transport.

Why does the Local Development Plan state a 'potential' for additional Park & Ride locations and not identified as a priority with locations earmarked since it states 'The LDP will channel growth in a sustainable manner across the District; plan proposals have been assessed against the Sustainability Appraisal, regarding their environmental, social and economic sustainability, including EQIA, APSI and HIA?

As a former member of the Transport & Infrastructure Strategic Working Group for the Ilex ~Regeneration Plan process (2010) I was made aware, at that time, of the active Air Quality Management Areas (AQMA) in the District ie

- Dale's Corner AQMA - All of Ebrington Terrace and Columba Terrace on Limavady Rd,
Derry and part of Glendermott Rd, Derry.
- Buncrana Road/Racecourse Road AQMA - All of St Patricks Terrace, all of Maybrook Terrace and part of Collon Terrace, Buncrana Road, Derry.

The Local Development Plan now (2020) shares additional Areas -

- Derry AQMA - An area encompassing parts of Creggan Road, Windsor Terrace on Infirmary Road, Creggan Street and Marlborough Terrace on Lone Moor Road, Derry.
- Spencer Road AQMA - Part of Spencer Road, Derry.'

Why have AQMAs increased and why has nothing been invested to reduce carbon emissions in the above Air Quality Management Areas? Why has increased traffic congestion within the city been allowed unabated and additional car parking been permitted along the city's riverbank? Surely there is an urgent need to reduce traffic in the city and to provide out of town Park & Ride locations especially since, as the Local Development Plan states, 'The Strategic Planning Policy Statement (SPPS)

does increase the scope of the Local Development Plan by facilitating Councils to formulate their own policies. so as to ensure that they are indeed effective in achieving the desired Planning impacts for the District

The Local Development Plan has identified – ‘The need to sustainably manage and improve air pollution is clearly an ever more important objective. In addition to the AQSNI, the LDP is one of the more effective mechanisms to do so including further traversing the River Foyle. Subject to compliance with other Planning policy within the LDP and other statutory permissions, the LDP will give favourable consideration to proposals for the river linkages such as bridges’. A railway line traversing the river and extending to Letterkenny would reduce traffic congestion and increase collaboration between the cross border further and higher education partners.?

The LDP states that ‘Where opportunities arise through redevelopment 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. Proposals which create new and/or additional surface level car parking along the riverfront will normally be refused. Proposals along the riverfront must comply with the requirements of GDPOL 2 and of traffic and stationary vehicles’. The Local Development Plan also states that ‘The outline bid for the recently secured City Deal: Derry~Londonderry City Region also includes proposals for priority regeneration sites/projects and direction for private investment opportunities which it hopes will stimulate investment for the City and for Strabane. It identifies a number of key regeneration projects for Derry and Strabane including:

- the Central Riverfront Regeneration Project (CRRP) in Derry - This will be a joint public/ private sector project which aims to deliver not just physical but economic, environmental and social regeneration of the City’s currently underutilised banks of the River Foyle;

Our Into the West Rail Lobby Group met with political parties and delivered our reasons for objecting to additional ‘surface level car parking along the riverfront’ at Duke Street and the Railway Station. Why did elected Councillors ignore our pleas?

Mary Casey

