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27 JAN 2020

**DfI Roads comments on Derry City & Strabane District Council Draft
Plan Strategy**

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DfI Roads welcomes the opportunity to comment on Derry City and Strabane District Council's (DCSDC) Local Development Plan 2032 – Draft Plan Strategy.

DfI Roads also acknowledges the communication that has taken place between ourselves and the Council leading up to the publication of their Draft Plan Strategy. We appreciate the importance DCSDC have placed on these communications and in particular the DfI guidance on the preparation of LDP Policies for Transport issued in February 2019.

DfI Roads consider the proposed policies to be largely sound, but offer the following comments for consideration.

CHAPTER 11 – TRANSPORT AND MOVEMENT

Draft Policy TAM 1 Creating an Accessible Environment.

Draft Policy TAM 4 Protection for New Transport Schemes.

Draft Policy TAM 5 Disused Transport Routes.

Draft Policy TAM 6 Transport Assessment.

Draft Policy TAM 7 Walking and Cycling Provision.

Draft Policy TAM 9 Car Parking and Servicing.

Draft Policy TAM 10 Design of Car Parking.

Draft Policy TAM 11 Temporary Car Parks.

The policies listed above are consistent with our guidance issued in February 2019. The justification and amplification also supports the policy wording, therefore are considered to be sound.

Draft Policy TAM 2 Access to Public Roads.

This proposed policy consistent with our Guidance issued in February 2019.

DfI Roads made one suggestion in September 2019 in reply to the Councils draft policy on Transport and Movement. We suggested to change the draft policy

wording from *“inconvenience the flow of traffic”* to *“inconvenience the flow of people and goods”* this has not been carried out. The Council may wish to consider our comment again.

The justification and amplification also supports the policy wording, therefore is considered to be sound.

Draft Policy TAM 3 Access to Protected Routes.

The proposed policy wording is largely consistent with our guidance issued in February 2019, but we would raise some concern in relation to intensification of an existing access on to a protected Route outside of the settlement limits as further detailed below.

Policy TAM 3 Access to Protected Routes – Page 163 – Transport and Movement – Other Protected Routes – Outside Settlement Limits.

The Department provided a response to the POP dated the 22nd August 2017, where the following comment was made in relation PPS3 – *‘It is noted that there are minor changes to this policy. The Department would be of the opinion that this policy accurately reflects its position in terms of access, movement and parking.*

DfI Roads also issued a response to the Councils draft policies on Transport and Movement on 10th September 2019 advising - *DfI Roads would have one significant comment to make on this proposed policy - we would consider it essential that under “Other Protected Routes – Outside Settlement Limits” the policy wording would include “or the intensification of use of an existing access”*

It is the view of DfI Roads that there is inconsistency of approach to intensification of an existing access in that, it is referred to in the ‘Within Settlement Limits section but not ‘Outside Settlement Limits’ which may pose a risk to soundness.

Intensification of an existing access outside settlement limits is equally if not more important than within settlement limits given the opportunity for greater road speed. If a planning application was not required to consider/ demonstrate intensification of an existing access outside settlement limits and was subsequently approved, it could create a vehicular access onto a protected route that is substandard for its type of use with poor visibility splays, to which a significant road safety issue would be created.

It is therefore necessary that the wording *‘or the intensification of use of an existing access’* be included in the Outside Settlement Limits section to protect the integrity of the Trunk Road network and in the interests of road safety.

It is also suggested that the word “direct” (i.e. involving *direct* access) be inserted for Other Protected Routes – Outside Settlement Limits (Page 163)

Paragraph 11.74 Page 165, DfI Roads would suggest that ‘Annex 1’ is replaced with ‘Figure 15’ (Page 166)

Draft Policy TAM 8 Provision of Public and Private Car Parks.

This proposed policy consistent with our guidance issued in February 2019. The justification and amplification also supports the policy wording. Therefore the draft policy is considered to be sound.

We would note that on page 172 para 11.100, wording is missing at the end of the paragraph making the sentence incomplete.

Draft Policy TAM 12 Transport Facilities.

DfI Roads do not wish to restrict the opportunities for development or expansion, however we would consider it essential that the integrity of the road network and particularly Trunk Roads are protected. It is also vital that proposals take full account of this and provide improvements were necessary.

CHAPTER 12 TOURISM DEVELOPMENT, CHAPTER 13 MINERALS DEVELOPMENT, CHAPTER 16 HOUSING IN SETTLEMENTS AND IN THE COUNTRYSIDE.

DfI Roads recognises the Council’s approach to ensure that there is ‘read across’ the various policies in these chapters through its General Development Principles and Policies and particularly GDPOL1 with its link the transport chapter.

It is important that the intensification issue is resolved as referred to in our response to TAM 3, so that this issue does not pose a risk to soundness of the policies in these chapters.

CHAPTER 14 SIGNS & OUTDOOR ADVERTISING.

DfI Roads were consulted on the Councils draft policy for Signs and Outdoor Advertising on 1st April 2019. Comments were made on these draft policies and returned to Council, some of these comments have not been addressed. We would reemphasise the importance of our earlier comments and recommend that these comments are taken on board and included within the new proposed policy.

- (i) Page 208 paragraph 14.9 – Article 87 & 21 are correctly referred to as part of the Roads (Northern Ireland) Order 1993, however Article 34 should be referred to as part of the Road Traffic Regulation (Northern Ireland) Order 1997.
- (ii) Page 209 paragraph 14.9 – DfI Roads would recommend that the following guidance is included for LED signage –

“Digital advertising screens should only display static images and should not contain moving images. The rate of change between successive displays should not be instantaneous and should not include the sequencing of images over more than one advert or a message sequence, where a message is spread across more than one screen image.”

“The minimum duration any image shall be displayed shall be determined by the Council.”

“The minimum message display duration should ensure that the majority of approaching drivers do not see more than two messages. The minimum message display duration of each image shall be calculated by dividing the maximum sight distance to the digital advertisement (metres) by the speed limit (metres/second) of the road (30mph = 13.4m/s, 40mph = 17.9m/s, 50mph = 22.4m/s, 60mph = 26.8m/s, 70mph = 31.3m/s.”

“The luminance of the screen should be controlled by light sensors which automatically adjust screen brightness for ambient light levels, in order to avoid glare at night and facilitate legibility during daytime. The proposed advertising screen should generally comply with the Institute of Lighting Professionals’ guidance PLG05, ‘The Brightness of Illuminated Advertisements’. Maximum night time luminance of the digital screen must not exceed the appropriate value from Table 4 of PLG05, which must be considered in conjunction with the environmental zones as defined in Table 3 of PLG 05. Proposed luminance levels and control arrangements are to be agreed by the Department for Infrastructure – Roads.”

“Advertisements shall not resemble traffic signs or provide directional advice.”

“Road Traffic Regulation (NI) Order 1997 makes it an offence to display any sign which resembles a traffic sign on or near a public road.”

“Telephone numbers and website addresses should not be displayed.”

CHAPTER 16 HOUSING IN SETTLEMENTS AND IN THE COUNTRYSIDE.

We would reaffirm our earlier response to the POP dated 22nd August 2017 and our response on the 26th April 2018 and the 1st July 2019 to the Councils consultation on Housing i.e. –

Strategic Housing Allocation – ‘Any option taken forward needs to take account of accessibility analysis in terms of existing infrastructure and any required infrastructure (Key Site Requirements) to facilitate development.’

For Location and Allocation of Housing Land - “Without all existing zoned lands being reviewed in terms of sustainability, it will be difficult to ensure that sustainable modes of transport are brought forward for these zones and indeed any new zonings.”

Draft Policy HOU 3 Density of Residential Development.

Under Justification and Amplification on Page 231 paragraph 16.39, DfI Roads note the wording ‘*which front on to key transport corridors, including arterial routes within Derry and Strabane*’. Clarification is required on what routes/roads are being referred to and in terms of identifying locations/sites, accessibility analysis should be the method used.

CHAPTER 20 WASTE PLANNING.

Draft Policy WP 1 Environmental Impact of a Waste Management Facility.

Under Justification and Amplification, paragraph 20.15, page 314 DfI Roads would suggest adding the following wording – “*where appropriate the Council will attach conditions to approvals requiring the installation of wheel cleansing equipment and the cleaning of roads adjacent to the proposed site.*”