

Chloe Duddy

From: Steve Bradley [REDACTED]
Sent: 27 January 2020 16:58
To: Local Development Plan
Subject: Into The West LDP Submission
Attachments: Into The West - LDP Draft Strategy Response - January 2019 - FINAL.pdf

Dear Sir/Madam,

Please find attached a submission from 'Into The West' rail lobby regarding the council's latest LDP Draft Strategy.

It is attached in a PDF format.

If you have any questions on any of this, or require the submissions in a different format, then please do not hesitate to contact me.

Best Regards,

Steve Bradley
Co-Chair, Into The West
[REDACTED]



Local Development Plan – Derry City & Strabane District Council
- Consultation response on the Draft Plan Strategy -
‘Into The West’ Rail Lobby Group

January 2020

Derry City and Strabane District Council

RECEIVED

27 JAN 2020

1. GENERAL COMMENTS

1. Into The West supports the broad vision the council is seeking to achieve through its LDP.
2. We are grateful that some of the issues we have raised previously have been incorporated into the document (e.g. a railway halt at CoDA, protection of disused track beds, possible line extensions to Tyrone and Donegal).
3. We are also pleased to see the document acknowledge the need for better integration between transport and land use to minimise the need for car journeys (Sections 11.7 & 11.36). Our District is already heavily designed around and dependent upon private vehicles. Focusing greater development and density around areas where transport links are strongest (or can be made so) will play a key role in reducing future car dependency here. Rail can make a significant contribution towards meeting this central objective.
4. Whilst the Draft Strategy is therefore a great improvement on the previous POP document, we believe it still needs to go further in acknowledging and embracing the role that rail could play within the North West Metropolitan Area. We have three primary concerns in this :
 - a. The strategy as currently proposed will *still* result in a Council area that is heavily reliant upon the use of private motor vehicles to function.
 - b. The large tracts of land currently zoned for housing are primarily located on the fringes of the city - in locations that will result in a continuation of the low-density urban sprawl that has characterised Derry’s spatial development for the last few decades.
 - c. We believe the Council hasn’t fully recognised or embraced the potential which rail offers here. Not just in meeting transport and modal-shift objectives, but also in health, housing, economic development, equality, tourism, broader sustainability and access to skills and employment.
5. Of the 6 guiding principles identified for the Draft Strategy in Section 3.7, we believe that rail has the ability to play a unique role in maximising the extent to which they are met.
6. Rail is obviously limited regarding where it can geographically make a contribution towards sustainable transport and modal shift (by virtue of having a fixed route). However - the Draft Strategy fails to maximise the opportunities it presents in the parts of the Council area which already DO have rail infrastructure passing through them. And it is insufficiently robust or ambitious regarding further areas to which rail could potentially be extended/returned.
7. By not recognising and fully embracing rail’s potential role, we believe this Draft Strategy will result in our District under-performing and under-delivering vs where it could and should otherwise be - with real-world implications for the daily life, health, quality of living and economic prospects of our citizens.

SPECIFIC COMMENTS

1. RAIL & SPATIAL PLANNING

CONTEXT

1. Derry’s spatial development in recent decades has been characterised by low-density urban sprawl, especially in peripheral greenfield locations to the north and west of the Cityside. New social housing provision in particular has been concentrated on the city’s western edges (the Buncrana Road/Skeoge area).
2. Low-density urban sprawl reduces the appeal and financial viability of public transport. It makes it hard to create public transport corridors which service sufficient numbers of people to be economically viable, and it increases the distance people live from those transport corridors and local services – thereby making private car use appear a necessity.
3. The percentage of households without access to a car or van within the District is one of the highest in NI - 36% in Derry and 31% in Strabane. It is likely to be higher still amongst those in social housing. To concentrate such a large portion of new social housing on the western

fringes of Derry therefore raises serious questions about social justice/exclusion and access to employment/training opportunities for those who live there.

4. Section 27.18 of the Draft Strategy states :
“As well as the city centre, higher densities should also be considered at key neighbourhood centres and along the city’s sustainable transport corridors. The density at which development takes place is linked to its ability to support key services and facilities like shops and bus routes”.
5. This recognises the role that transport corridors can and should play in enabling higher housing density, but focuses entirely on buses in doing so.
6. A rail line runs from the very heart of Derry to the city’s north-eastern fringes and beyond. **It is the only mass-transit transport corridor within this council area, & the only rail line in the west of the province of Ulster.**
7. Derry’s rail station is the second-most isolated on the island of Ireland. You have to travel 21 miles from there before you reach the next nearest stop (in Bellarena – population 330). This is despite Derry being a regional capital and a major urban centre on the island.
8. Major towns and cities in the east of NI – e.g. Belfast, Lisburn, Coleraine, Portadown and Ballymena - have a network of nearby rail stations which serve as a commuter network to feed into them. The absence of similar for Derry increases social and economic exclusion here, as well as car dependency.
9. There is therefore a clear need for new rail stations to be created between Derry and Bellarena - plus a huge opportunity to focus new sustainable housing, services and economic development in those locations.
10. Despite this, the only mention the LDP currently makes of enhanced rail provision is the possibility of a new station at City of Derry Airport (CoDA).

THE RAIL OPPORTUNITY

11. The LDP should follow through on its objective of better integrating transport and land-use by recognising the huge opportunity the Derry-to-Belfast railway line presents for better and more sustainable spatial planning within the District.
12. Section 11.25 of the Draft Strategy clearly articulates such an approach for new bus routes :
“The LDP will facilitate the location and density of future development along such profiled routes to ensure that the maximum number of people are located adjacent to such high frequency and well-connected routes”
13. It is remiss to identify this as a sensible strategy for encouraging modal shift when it comes to buses, but fail to recognise the much greater opportunity the council’s only mass-transit rail corridor presents for this.
14. The railway line should therefore be identified within the LDP as a combined transport, housing and economic development corridor/opportunity zone - with new transport hubs created along it around which services, economic development and higher density housing can be concentrated.
15. Combined with planned improvements to the frequency and capacity of the railway line (I.e. Phase 3), this would enable the corridor to function as a commuter line for Derry city, as well as an intercity service towards Belfast.
16. We recommend that two new transport hubs be located along that mixed-use transport corridor - at Strathfoyle and at CoDA.
17. The area around those new stations should be demarcated as Density Band B sites under HOU 3 (Density of Residential Development). Proximity to rail stations should be specifically mentioned within that policy as an enabler of higher density. This policy currently focuses solely on arterial routes (i.e. roads).

A STRATHFOYLE RAILWAY HALT

18. The LDP should include the desire for a new railway halt at Strathfoyle, offering a < 5min journey time into the centre of Derry.
19. This would enable an increase in the allocation and permitted density of new housing, services and economic activity within Strathfoyle – in-turn justifying the creation of a railway halt there. Developer contributions from the new housing enabled within the area could fully or partly fund the creation of that rail halt, ensuring little or no impact on the public purse.

20. More than enough land is available to do this without negatively impacting Foyle Port or future industrial development in that area (a rail stop would actually help in both regards). And an increase in desired housing density there would minimise the amount of new land required to expand its population anyway.
21. Strathfoyle should therefore be zoned as an LDP Phase 1 'Urban Capacity Site' for new dwellings and services, enabled by new localised rail provision there.
22. The 2011 census listed Strathfoyle's population as 2,419 - a 53% increase on 2001. It will have grown further since as a result of the ongoing house building there.
23. With a new railway halt enabling a greater allocation of house building and densification within Strathfoyle, its population could feasibly grow to 5-10,000 in a sustainable manner across the lifespan of this LDP. All through utilising its location alongside the city's only mass-transit transport corridor.

CITY OF DERRY RAILWAY HALT

24. Section 11.23 of the Draft Strategy mentions the desire for a rail halt at CoDA :
"The Council considers a specific rail halt with an associated edge of city Parkway as essential to fully integrate and deliver the combined benefits of a modern rail and airport infrastructure"
25. This section is welcome but should go much further – e.g. by stating that Council will proactively work with DFI & Translink to see this aspiration delivered, and by recognising the necessity of the Phase 3 work being completed before it can be achieved
26. Given the small number of passengers using the Airport currently, we believe it is also important to clarify the intended multi-purpose nature of a new rail halt at CoDA. As well as serving the Airport, it would also act as a local station for the Maydown-Eglinton-Greysteel-Ballykelly area ; a Park and Rail facility for travel into Derry and Belfast ; and potentially also as a hub for a new business park/Enterprise Zone there.

2. MODAL SHIFT

CONTEXT

1. Car ownership levels are relatively low across the Council area. That will inevitably change as the local economy improves – adding further vehicles to our roads, particularly at peak times.
2. If household car ownership in Derry increases to the NI average (from 64.1% to 77.8%), that would add over 4,256 additional vehicles to the city's roads. A much more modest rise to the same level as the Metropolitan Lisburn area (68.1%) would still add almost 1,300 extra vehicles in Derry city. And all before any population increases or a rise in the number of vehicles per household are factored in.
3. Traffic congestion in Derry is already visibly increasing over time. It will inevitably escalate further once the A6, A5 & A2 road widening projects are completed.
4. All of which makes increasing modal shift essential within the District. However – amongst the range of potential public transport options, the draft strategy looks almost entirely toward bus to achieve this.
5. It is important to note that amongst public transport modes rail offers the highest potential for modal shift. A number of academic studies have identified the fact that many potential users view bus transit as being of low social status, and are significantly less likely to shift onto it than they are onto rail. This problem is not acknowledged anywhere within the strategy.
6. Despite the presence of an advanced bus network across NI - particularly within and between key towns and cities - the latest Transport Survey of Northern Ireland (2015-17) found that 44% of respondents said they *never* travel by bus. Rail therefore offers a unique opportunity to increase potential modal shift amongst those who do not view buses as an attractive option.
7. Section 2.21 of the draft strategy identifies that those who commute into the council area for work earn higher average wages than those who live *and* work within the council area. Given the geography of the council area, the location of employment opportunities and existing traffic patterns - it could be assumed that the majority of these better-paid commuters are driving into the District from either the A2 coastal corridor or from Donegal. This would increase the case for a Park and Rail facility at CoDA, and also for rail extensions into Donegal. Particularly when one considers again the higher chance of securing modal shift from car onto rail than onto buses (including Park & Ride Buses).

8. Section 11.4 acknowledges that modal shift will be easier to achieve in key population centres :

“The Council acknowledges that the focus of many of these transport measures relate strategically to Derry City and Strabane Town where there is the greatest opportunity to deliver modal shift-encouraging measures as a result of the successful integration between transportation and land use”.

9. Rail offers a unique exception to this within the District. New Stations at Strathfoyle and CoDA would enable significant modal shift to be achieved amongst a series of smaller settlements located along the A2/north-eastern edge of the District (and on into Causeway Coast & Glens).
10. It is therefore essential that the commitment to modal shift contained within the Draft Strategy is translated into policies and proposals that have a genuine chance of reducing the car dependency that is currently hard-wired into our city - with the role rail can play within this fully appreciated and embraced.

THE RAIL OPPORTUNITY

11. Section 11.24 of the Draft Strategy states :

“Working with DFI and Translink, the Council will seek the development of a District public transport system that delivers effective infrastructure which supports a modal shift : for example, dedicated bus lanes and a flagship ‘Derry Glider’ style bus route operating frequently along cross-city route..”.

12. There is no recognition within this of the role that rail (both the existing network, and an expanded one) could play in such a District transport system, nor any mention of it. This should be addressed along the lines mentioned in Section 1 above (i.e. by recognising and capitalising on the opportunity presented by a mass-transit rail corridor within the District)
13. Rail also offers a significantly greater opportunity for integrated transport than any other mode - because unlike buses, it can fully accommodate cycling. Thereby expanding the radius from which passengers can access and utilise rail without resort to a motor vehicle.
14. We also note that the Draft Strategy talks repeatedly throughout about establishing “Park and Ride/Share/Stride” facilities : thereby outlining opportunities to park a motor vehicle and avail specifically of bus, car share or walking opportunities - but not rail. We request that the strategy is also mindful and inclusive of the role for rail within this by specifically mentioning ‘Park and Rail’ opportunities too.
15. In summary - the role that rail can play in encouraging modal shift should be more clearly identified, exemplified and planned-in throughout the LDP.

3. EXTENSIONS TO THE EXISTING RAIL NETWORK

CONTEXT

1. The Local Transport Study measures outlined on page 147 of the draft strategy state that :
“During the LDP period, a feasibility study will be undertaken for the extension of the rail network to Strabane/Omagh etc, and to Letterkenny/Donegal etc”.
2. We are grateful to the Council for taking on-board Into The West’s previous representations on the need to conduct feasibility studies into potentially reopening routes into Tyrone and Donegal, and for mandating the protection of former rail track beds within its planning policies.
3. We note that the chapters in Section 2 of the draft strategy which look at joint working with the three adjoining NI councils (Causeway Coast & Glens, Fermanagh/Omagh and Mid-Ulster) make ample mention of roads but none at all of rail. This is despite the following :
- a. Bellarena and Castlerock rail stations are located in the Causeway Coast District. They suffer the same problems regarding limited rail capacity and services that Derry does in the absence of the Phase 3 works. It is therefore essential that the two councils work together to have this issue resolved with DFI.
 - b. The feasibility study into returning rail to Tyrone would investigate the route from Derry to Portadown - via Omagh (Fermanagh/Omagh Council) and Dungannon (Mid Ulster). Derry-Strabane should therefore be working with these Districts to promote the potential routes and to secure funding for the feasibility study into reopening them.
4. With regards Donegal County Council, Section 2.54 of the strategy states :
“there may be feasibility testing of the extension of the rail network into Donegal...”
This choice of wording is understated, insufficiently robust, and contradicts/undermines the firmer commitments that are given on this matter elsewhere within the draft strategy.

THE RAIL OPPORTUNITY

5. The statement within the draft strategy that feasibility studies into line extensions to Tyrone and Donegal will take place “during the LDP period” (i.e. at an unspecified point up to 2032) is insufficient.
6. It is far too vague a commitment, lacks urgency regarding the role rail can play in mitigating climate change & improving our local economy, & risks other possible rail extension projects in NI securing any funding that becomes available ahead of us (e.g. the proposed Portadown to Armagh rail extension, which ABC Council are already funding a feasibility study on).
7. **There needs to be a firm commitment from Derry-Strabane Council that the funding will be secured to enable these feasibility studies to take place in 2020**, with their results then informing the LDP prior to its adoption in late 2021. To do them justice, the cost of these two feasibility studies together would likely be in the region of £100,000 (delivering both an engineering/route feasibility and a financial/business case study).
8. Section 11.29 talks about the need to provide “realistic alternatives to private car usage to bring people to the City / District” from directions such as Strabane/Newtonstewart and Donegal. It currently talks about Park & Ride/Share facilities for this, when rail would offer the most realistic channel for maximising modal shift there if the feasibility studies proved positive.
9. The LDP should specifically acknowledge the huge benefits that would be gained by Strabane and Newtonstewart if a rail extension was deemed feasible from Derry to Omagh, through those settlements.

INTO THE WEST SUBMISSION CONTACT :

Steve Bradley, Co-Chair :

