

Chloe Duddy

From: Peter McCarron [REDACTED]
Sent: 27 January 2020 08:23
To: Chloe Duddy; Local Development Plan; Peter McCarron
Subject: Re: Derry-Strabane LDP Draft Plan Strategy Notification
Attachments: Representation regarding the LDP draft Plan Strategy January 2020.pdf

Hi,
please find attached my submission regarding the LDP Draft Plan Strategy.

regards

Peter

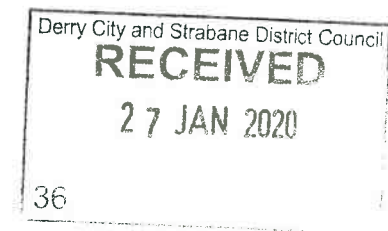
From: Chloe Duddy <chloe.duddy@derrystrabane.com>
Sent: Tuesday 3 December 2019 17:07
To: mccarron_peter [REDACTED]
Subject: Derry-Strabane LDP Draft Plan Strategy Notification

Good Afternoon,

Please see attached letter – Derry-Strabane LDP Draft Plan Strategy Notification.

Kind Regards,

Chloe Duddy
Administration Supervisor
Planning Department
Derry City and Strabane District Council
98 Strand Road
Derry BT48 7NN



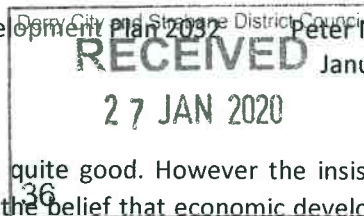
Tel no: 028 71253253 Ext. 8418
Email: chloe.duddy@derrystrabane.com



Derry City & Strabane
District Council
Comhairle
Chathair Dhoire &
Cheantar an tSrátha Báin
Derry Cille & Strabane
Distric Council

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.



Comments on the Draft Local Development Plan.

1. Overall the draft Plan Strategy (dPS) seems to be quite good. However the insistence on including proposals/commitment for new roads reinforces the belief that economic development is reliant on road based transport and seriously undermines the sustainability credentials and therefore the soundness of the dPS.
2. In section 7.12 the dPS accepts that climate change has already affected the Northwest and will continue to do so. Section 7.13 states that in July 2019 Derry City & Strabane District Council declared a Climate Emergency. The need for action is clearly recognised by The Council.
3. *GDP 7 Development Principles: Preserving and Enhancing the Natural Environment* includes in *point ii* a statement that loss of the best and most versatile agricultural land will be avoided. *Point viii* adds that development will be managed in sustainable ways that collectively mitigate against the effects of climate change, pollution, habitat loss and fragmentation.
4. Section 11.14 states that climate change and health and social equality issues confront us with the challenge of shifting from an over dependence on private car to public transport, walking and cycling.
5. The above statements recognise the need and the difficulty in tackling climate change, health and social issues and our behaviours that contribute to them.
6. However the statements in support of continued massive road building projects completely contradict the commitments to sustainability, which incorporates environmental, health and social aspects.
7. I would argue that the situation is even worse. Such statements are prejudicial to the successful achievement of objectives and policies relating to sustainability.
8. One example of the inability to reconcile what we know needs done with what we intend to do can be found in Chapter 11. I have already mentioned section 11.14 above. Section 11.16, with no sense of irony, states that the A5 upgrade will strengthen local connections. The simple statement fails to recognise that the A5 upgrade has significant environmental impacts. Section 11.16 completely contradicts section 11.14 amongst others.
9. The Environmental Statement (ES) for the A5 WTC lists numerous significant impacts, including that the 80km of road will destroy approximately 3000 acres of land, much of it good agricultural land (see point 3 above), but it will also have significant impacts on protected habitats and wildlife. Perhaps most importantly of all, the ES concludes that the increase in carbon dioxide emissions would constitute a significant effect on the environment. Support for the A5 is clearly contradictory to the overarching sustainability aim of the LDP and potentially renders it unsound.
10. The A5 WTC is subject to another Public Inquiry and the LDP appears to be assuming that it will proceed unaffected.
11. The A5WTC only fits in with the Regional Development Strategy because it is specifically mentioned. It contradicts every policy on sustainability, as it does in the dPS.
12. Building an expectation that an orbital ring road and a third road bridge outside the city (Figure 12 of the dPS) are necessary for the economic development of Derry further undermines the credibility

of support for modal shift. It's just more of the same type of development that contributed to the problems that The Council has recognised as a Climate Emergency.

13. The more roads we build, the harder it will be to get people out of their cars. Also, what is the point of building huge road projects and then trying to persuade people not to use them? The construction of such roads, including the A5WTC, would represent a massive failure in policies to achieve modal shift. This is not to say that small scale targeted road improvements are not necessary.

14. Section 11.18 lists lack of motorways and paucity of dual carriageway as an example of how poorly served we are by transport infrastructure. However these disadvantages, perceived and real, should be turned to our advantage. Why do we have to become even more unsustainable before we can become sustainable? We can skip the motorway stage and go straight to decent public transport, especially rail.

15. My examples are not exhaustive. Anyone who is properly familiar with the dPS will easily be able to find other examples of how references to large scale road building renders the document unsound due to contradictory policy statements. For example section 11.19 seems to imply that there is a desire to facilitate/encourage people to drive further, faster.

16. The emphasis on facilitating cycling is very welcome. E-bikes in particular are likely to become a very important alternative to cars and would be particularly suitable given Derry's topography.

17. Section 11.5 states that as far as practicable the completed cycle networks should serve all residential areas. I can't imagine a policy statement saying that as far as practical the road network should serve all residential areas. The dPS should be changed to give a firm commitment that all residential areas **will** be served by the cycle network.

18. Park and ride facilities should be provided at every town and village and then encourage people to use public transport for most of their journey, rather than encouraging them to drive to the edge of the city before availing of public transport.

19. The North West Transport Study needs to be completed urgently. As does the feasibility of extending the rail network. This approach contrasts with the A5WTC which was declared as part of a political agreement and never decided upon as part of a proper study of what we actually need.

20. Surely if there is enough traffic to justify constructing a dual carriageway (which will not solve congestion problems in Derry, Strabane or Omagh) there must be enough passengers to support a rail link.

21. I think that The Council should include a statement that planning consideration will be given to the creation of the first national park in the North, based on the AONB area in the District. National parks are major attractions to an area.

Sustainability Appraisal Report

22. The matrix on page 153 of the Sustainability Appraisal Report does not appear to be correct. In the last row it states that economic development based on the A2, A5 and A6 schemes, all major road projects will encourage sustainable travel. How?

23. The same row has question marks, amongst others, for effects on improving air quality, reducing cases of climate change, protecting natural resources and enhancing biodiversity. This is clearly wrong as they will have negative impacts on each of these. The Sustainability Report itself is unsound if my understanding of this matrix is correct.

Conclusion

24. To conclude, I feel that although there is much to commend in the dSP, it is unsound in so far as it perpetuates the perception that we need to build more roads. In this regard it is also prejudicial to:

- sustainability,
- Any future railway provision along the A5 corridor,
- Achieving modal shift.

25. Whilst I have not read the Sustainability Appraisal Report in detail it is concerning that a quick look can find what appears to be incorrectly identified interactions between policy statements and various objectives.

26. I hope that my comments are seen in the constructive light in which they are intended.

Thank-you.

Peter McCarron, Derry.