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From: briega [REDACTED]
Sent: 19 April 2019 12:54
To: DevelopmentPlan@midulstercouncil.org
Subject: Draft Plan Strategy Representation
Attachments: Draft Plan Strategy Representation.docx

Good afternoon

Please find my representation to the Draft Plan Strategy attached.

I would be grateful if you would acknowledge receipt of it.

Kind regards
Briega Coyle

Soundness Test

The following soundness tests have not been met as detailed below:

C1 Did the Council take account of the Regional Development Strategy?

The Draft Plan Strategy is inconsistent with the following Regional Guidance and Spatial Framework Guidance within the Regional Development Strategy:

RG2 Deliver a balanced approach to transport infrastructure

- Use road space and railways more efficiently. This will require an improvement in the public transport service. Continued investment in public transport and in infrastructure such as the development of quality multi-modal facilities and park and ride sites, will encourage motorists to take the bus or train for the main part of their journey and reduce the volume of traffic on the network.
- Improve social inclusion. This will mean seeking innovative public transport services including transport programmes focused on the user and services that meet the needs of communities. These will include Door-to-Door services, demand responsive services, Rapid Transit and services tailored to the needs of older people and people with disabilities
- Improve safety by adopting a 'safe systems' approach to road safety. This approach considers roads, vehicles and road users together and seeks to ensure that each of these three elements takes account of the limitations or potential weaknesses in the other two. A new Road Safety Strategy for Northern Ireland 2010-2020 is being developed by DOE.

RG9: Reduce our carbon footprint and facilitate mitigation and adaptation to climate change whilst improving air quality.

- Reduce greenhouse gas emissions from transport. This will include reducing the need to use the car. By designing neighbourhoods that have shops, workplaces and services, schools, churches, parks, and other amenities near homes, residents and visitors will have increased opportunities for walking, cycling, or taking public transport as they go about their daily lives.

SFG14: Improve accessibility for rural communities

- Integrate local transport. Promoting integrated rural transport initiatives which meet the needs of those living in isolated areas and in particular elderly and disabled people.

The Draft Plan Strategy seeks to encourage improvements to public and private transportation provision including railway lines and upgrading of the road network. SPF 8 states:

"... Also, in the interest of promoting sustainable transport, consideration needs to be given to providing safe environs for the pedestrian and cyclist. This does not necessarily mean the provision of dedicated cycle ways as it can often be achieved

through careful design of roads and promotion of safer routes, particularly when it comes to children travelling to school” (4.47)

Paragraph 4.47 is counter-productive as it effectively discourages the provision of dedicated cycle ways. Why would a developer make provision for a cycle way if the Draft Plan Strategy says they don't need to? Furthermore existing roads are not carefully design to promote safer routes. Elected members will only be too aware that one of the single biggest issues in every town, village and rural area in Mid Ulster is speeding and its impact on road safety. It is not safe to walk on public roads especially for children going to/from school.

It also states:

“By designing for public transport and encouraging walking and cycling this will also lead to improvements for private transport as a result of taking people off the road.” (4.51)

The transportation policies within the draft Plan Strategy are:

- Policy Tran 1 – New roads and road improvement schemes
- Policy Tran 2 – Disused transport routes
- Policy Tran 3 – Car parking
- Policy Tran 4 – Access onto protected routes and other route ways.

With the exception of Policy Tran 2, all seek to make journeys by car easier. While Policy Tran 2 seeks to protect disused transport routes, there are no policies which seek to encourage walking or cycling as realistic, safe and sustainable mode of transport. This needs to be embedded in the transportation policies and throughout the Draft Plan Strategy.

C2 Did the Council take account of its Community Plan?

The Community Plan seeks to increase use of public transport and active travel and increase journeys made by walking/cycling/public transport.

The Draft Plan Strategy is inconsistent with the Community Plan as there are no Transportation policies which encourage the provision of facilities for pedestrians and cyclists.

C3 Did the Council take account of policy and guidance issued by the Department?

The SPSS sets out the following Regional Strategic Objectives in relation to transportation and land use planning:



- promote sustainable patterns of development which reduce the need for motorised transport, encourages active travel, and facilitate travel by public transport in preference to the private car;
- ensure accessibility for all, with the needs of people with disabilities and others whose mobility is impaired given particular consideration;
- promote the provision of adequate facilities for cyclists in new development;
- promote parking policies that will assist in reducing reliance on the private car and help tackle growing congestion; and
- promote road safety, in particular for pedestrians, cyclists and other vulnerable road users.

The Strategic Planning Policy Statement states the LDP should provide the means to promote, influence and deliver a shift to more sustainable travel modes within a council area.

It also states

“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 appropriate level of parking provision which is properly managed, should assist in reducing the number of cars in our urban areas.” (6.300)

In addition, it states that LDPs should recognise the role of car parking in influencing modal choice between private car and public transport.

The Draft Plan Strategy fails to take SPPS into account through the following:

- It fails to meaningfully encourage active travel,
- effectively discourages developers from providing dedicated cycle facilities;
- contains policies to improve the network for car uses which will as a consequence will create a less safer environment for pedestrians, cyclists and other vulnerable road users.

CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

The SA/SEA has only considered alternatives in so far as it relates to private car and public transport. There has been no consideration of journeys made by walking or cycling. A significant number of journeys could be taken by more sustainable modes especially within towns and villages if there were policies which supported a safe environment for walking and cycling.

SA/SEA

As noted above the SA/SEA has only considered alternatives in so far as it relates to private car and public transport. There has been no consideration of the potential for journeys to be

made by walking or cycling. A significant number of journeys could be taken by more sustainable modes especially within towns and villages if there was policy which supported a safe environment for walking and cycling.