

# #10

**COMPLETE**

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## Q1 Personal Details

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**Q2 Agent Details (if applicable)** Respondent skipped this question

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## Q3 To which part of the Draft Plan Strategy does your representation relate?

Paragraph **23.0 Transportation and 24.0 Monitoring of our plan**

**Q4 Do you consider the development plan document (DPD) is:** **Unsound**

**Q5** If you consider the draft Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6.

**Consistency test 3. Did the council take account of policy and guidance issued by the Department?**

**Consistency test 4. Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?**

**Coherence and effectiveness test 2. The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.**

**Coherence and effectiveness test 3. There are clear mechanisms for implementation and monitoring.**

**Q6** Please give details of why you consider the Draft Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible. If you consider the Draft Plan Strategy to be sound and wish to support the Draft Plan Strategy, please set out your comments below. Please note your representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. There will not be a subsequent opportunity to make a further submission based on your original representation. After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

There is a requirement for the LDP Plan Strategy to include a robust evidence base, specifically in relation to Transportation. As guided by the Department in Development Plan Practice Note 7, entitled 'The Plan Strategy', Section 3 of the Planning Act (Northern Ireland) 2011 sets out requirements for Councils in respect of the Local Development Plan (LDP) process where the Council is required to undertake a 'Survey of the District', the legislation states

(1) A council must keep under review the matters which may be expected to affect the development of its district or the planning of that development.

(2) Those matters include-

(a) the principal physical, economic, social and environmental characteristics of the council's district;

(b) the principal purposes for which land is used in the district;

(c) the size, composition and distribution of the population of the district; (d) the communications, transport system and traffic of the district; (e) any other considerations which may be expected to affect those matters;

(f) such other matters as may be prescribed or as the Department (in a particular case) may direct.

Development Plan Practice Note 7 also provides guidance specific to 'Transportation' in the preparation of the Plan Strategy where it states (para 21.4):

A Council should assess the transport needs, problems and opportunities within the plan area to ensure that appropriate consideration is given to transportation issues in the allocation of land for future development, including appropriate integration between transport modes and land use.

There is no references and the Council does not appear to have undertaken an up to date survey or assessment of the transport needs in the plan area.

There is a requirement for the Council to take account of policy and guidance issued by the Department.

The Planning Act (Northern Ireland) 2011 Part 8 Section S(b) directs the Council to take account of policy and advice contained in guidance issued by the Department where it states:

(5) In preparing a plan strategy, the council must take account of (a) the regional development strategy;

(aa) the council's current community plan;

(b) any policy or advice contained in guidance issued by the Department;

(c) such other matters as the Department may prescribe or, in a particular case, direct, and may have regard to such other information and considerations as appear to the council to be relevant.

This requirement is further referenced and explained in the Departments' 'Development Plan Practice Note 6 'Soundness' (Dept. for

Infrastructure, May 2017) where it states:

5.4.8 'Sections 8(5)(b) and 9(6)(b) of the 2011 Act require a Council to take account of any policy or advice contained in guidance issued by the Department in the preparation of the Plan Strategy and Local Policies Plan respectively'.

5.4.9 'These statutory requirements aim to ensure that the DPD takes account of a range of policies and advice which cover the Council area, particularly at the regional level'

5.4.10 'A council should therefore be able to show how policy formulation and development has taken account of the SPPS and any other relevant policy and guidance prepared by the Department. Relevant regional policy should be referred to throughout the DPD to show the linkage between policies and proposals and how they help to implement the core principles, aims and objectives. Technical Supplements may also be used as the evidence base to justify the content of the DPD'.

The statutory requirement for evidence and for a survey to be undertaken of 'the communications, transport system and traffic of the district', as part of the formulation of the LOP is clearly directed by the Department in the Strategic Planning Policy Statement (SPPS) where the SPPS states (paras 6.299 and 6.300):

The preparation of a LDP provides the opportunity to assess the transport needs, problems and opportunities within the plan area and to ensure that appropriate consideration is given to transportation issues in the a/location of land for future development, including appropriate integration between transport modes and land use. Preparation of a local transport study will assist in this process. Councils should seek early engagement with DRD, or the relevant transport authority, and take account of their 'The New Approach to Regional Transportation' document and any subsequent transport plans.

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.

Planning Policy Statement 13 - Transportation and Land Use also includes direction from the Department in respect of the transportation evidence base required to inform local development plans where General Principle 2 (page 14) states "Accessibility by modes of transport other than the private car should be a key consideration in the location and design of development."

The supporting text (para 37) states,

The process of accessibility analysis should be employed to assist in the identification of appropriate sites where integration with public transport, cycling, walking and the responsible use of the private car can best be achieved. The role of accessibility analysis and good practice guidance is set out in Appendix 2 of this statement.

The referenced Appendix 2 states,

Accessibility analysis is the process of measuring ease of travel from or to specific origins or destinations in order to provide an evaluation of the travel opportunities available, that connect people from where they are to where they want to go. Such analysis will normally be carried out as part of a transport study undertaken in support of a development plan or a transport plan.

Accessibility analysis will inform and assist the preparation of development plans and transport plans focusing primarily on the following two areas:

- assessing settlements in terms of their relative connectivity to neighbouring cities and towns; and
- assessing potential development sites in terms of their level of integration with public transport, cycling, walking and the responsible use of the private car.

Appendix 2 includes a methodology setting out the 3 stages to an Accessibility Analysis

Stage one will assess the relative connectivity between settlements and assist in the process of allocating the RDS Housing Growth Indicators in development plans.

Stage two will involve a general analysis of the existing transport situation in an area, to assist in the determination of broad areas of relatively good or poor accessibility.

Ideally the process will involve producing a set of isochrone maps for the different transport modes of public transport, walking, cycling and car. These maps will help on the assessment of where, in general terms, development should be directed within a settlement. The maps will also assist in the formulation of transport measures and schemes to be included in transport plans.

The isochrone maps will be based on the travel time to /from a small number of selected locations within urban areas, that are representative of the land uses outlined below:

- employment, education and training;
- health and social services; and
- shopping and leisure.

The 4 transport modes to be assessed are walking, cycling, bus and car.

Stage three will involve a more focused analysis, examining in greater detail the accessibility of potential sites to be zoned in the development plan. For example, for a new industrial zone, a key issue will be to understand the ease with which it might be reached by prospective employees. For a housing zone the main interest would be in destination accessibility, the places prospective

by prospective employees. For a housing zone the main interest would be in destination accessibility- the places prospective residents can reach by different modes of transport from that potential site. This process will assist in the final selection of sites for zoning. In cases where sites with poor accessibility by non-car modes are selected for potential zoning, accessibility analysis will help to identify measures that should be introduced to improve accessibility. These can then be identified in the development plan as key site requirements.

Furthermore, the draft Plan Strategy has been formulated in advance of the updated 'Regional Strategic Network Transport Plan', the 'Sub-Regional Transport Strategy' and the 'Sub Regional Transport Plan' all of which are being prepared by the Department for Infrastructure.

These new plans will supersede the 'Regional Transportation Strategy (RTS) 2002-2012' and the 'Sub-Regional Transport Plan 2015 (SRTP)'. The RTS was adopted in July 2002; The RSTNTP was adopted in March 2005; and the SRTP was adopted in June 2007. These policy documents could not be considered as providing a robust, up to date evidence base for the formulation of the draft Plan Strategy.

The Council does not appear to have taken account of policy and guidance issued by the Department, specifically in respect of the statutory requirement in the Planning Act (NI) 2011 Section 3 (1)(2)(d) to undertake a survey of the 'transport system and traffic of the district' and of the policies contained in SPPS and PPS13 regarding the preparation of a 'transport study' .

The draft Plan Strategy sets out two main objectives under Transportation:

improving the rural and urban road network and providing facilities that encourage more sustainable modes of transport. It is unclear how the minimalistic transportation policies contained within the draft strategy can secure the meeting of these objectives. The primary focus of the transport policies within the draft Plan Strategy appears to be on providing and protecting car parking facilities, particularly in town centres. This is despite the congestion and accessibility issues caused by attracting cars to park in the town centres.

Under 24.0 Monitoring of Our Plan, one of the objectives relating to Accommodating People and Creating Places is: To provide for 11,000 new homes by 2030 in a range of housing capable of meeting the needs of families, the elderly and disabled, and single people,

at locations accessible to community services, leisure and recreational facilities, for those people with and without a car. However, none of the related outcomes, indicators or measures make reference to sustainable transport, including walking, cycling and public transport. This comment also applies to the first objective under Creating jobs and promoting prosperity on page 251. Under the objective of Enhancing the environment and improving infrastructure on page 252, the first outcome states that there will be a reduced need to travel by private transport. As the proposed indicator associated with this is the Travel to Work Survey, we would suggest that the outcome being sought is an actual reduction in the use of private transport, rather than just a reduced need, which in itself is unlikely to be measurable.

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**Q7** If you consider the Draft Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Draft Plan Strategy sound.

Preparation of a robust evidence base to include an up to date survey of the transport system and traffic of the district and the preparation of a local transport study. This should include a transport assessment of the housing, employment and strategic site allocations, in order to determine the traffic impacts that the proposed development scenarios would have on the surrounding highway network, car parking and public transport provision, including Park & Ride.

Ensure that important sustainable transport principles currently existing in PPS13 are included in the new transport policies within the LDP Strategy.

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**Q8** Please note that the Department will expect the independent examiner to give the same careful consideration to written representations as to those representations dealt with by oral hearing. If you are seeking a change to the Draft Plan Strategy, please indicate if you would like your representation to be dealt with by:

**Written  
Representation**

**Q9** Signature



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**Q10** Date

Date / Time

**04/04/2019**

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