

DfI Roads Response (March 2021) to LCCC

Local Development Plan 2032 Draft Plan Strategy Consultation on Focussed Changes Addendum including Minor Changes Schedule January 2021

DfI Roads welcome the opportunity to comment on the proposed focussed and minor changes to the draft Plan Strategy (dPS) 2032. Our response below is structured to reflect the sequence presented in the LCCC consultation document January 2021. For clarity, our initial comments on the dPS, issued 10th January 2020 (see Appendix A, below) remain the same for those sections where no changes have been proposed by LCCC January 2021.

Proposed Focussed Changes

DfI Roads comment (January 2020), PART 2 Operational Policies of the dPS: Page 92, TRA1, bullet point C) – Consider including reference to cycling, in line with DfI Guidance on the Preparation of LDP Policies for Transport (issued January 2019).

LCCC Proposed Focussed Change January 2021 – FC11 - TRA1 Creating an Accessible Environment

The Council proposes for clarity, as a focussed change, to amend bullet point c) of Policy TRA1, page 92, as follows: “c) priority pedestrian and cycling movement within and between land uses”

DfI Roads Response March 2021

DfI Roads is content with the proposed focussed change.

DfI Roads comment (January 2020), PART 2 Operational Policies of the dPS: Page 94, TRA3 Access to Protected Routes, Other Protected Routes – Outside Settlement Limits – The Plan Strategy as currently drafted would permit direct access onto the Protected Route Network Outside Settlement Limits where access cannot be reasonably obtained from an adjacent minor road. This proposed wording does not align with the Strategic Planning Policy Statement for Northern Ireland (SPPS) and DfI Guidance on the Preparation of LDP Policies for Transport (issued January 2019). The reason why this is important is the Protected Route Network are main roads that facilitate the efficient movement of traffic over long distances throughout Northern Ireland. These roads are regionally significant, rather than just serving an individual council area. They contribute significantly to economic prosperity by providing efficient links between all the main towns, airports and seaports, and with the Republic of Ireland. LCCC should amend the wording of TRA3 Access to Protected Routes to align with the SPPS and DfI Guidance.

LCCC Proposed Focussed Change January 2021 – FC12 - TRA3 Access to Protected Routes

The Council proposes for clarity, as a focussed change, to amend Policy TRA3, under subheading ‘Other Protected Routes – Outside Settlement Limits’ page 94, as follows: “Other Protected Routes – Outside Settlement Limits Planning permission will only be granted for a development proposal involving direct access, or the intensification of the use of an existing access *where it is demonstrated that access cannot reasonably be taken from an adjacent minor road* in the following

circumstances: *An exception will apply For a replacement dwelling in accordance with Policy COU3 where the dwelling to be replaced is served by an existing vehicular access onto the protected route; for a farm dwelling or a dwelling serving an established commercial or industrial enterprise where access cannot be reasonably obtained from an adjacent minor road; and, for other developments which would meet the criteria for development in the countryside, where access cannot be reasonably obtained from an adjacent minor road.* In all cases the proposed access must be in compliance with the requirements of Policy TRA2.”

Dfl Roads Response March 2021

The proposed focussed change has not addressed the issue.

Under soundness test C3 - The proposed focussed change (above) is not consistent with regional policy and guidance issued by the Department, namely the SPSS and Dfl “Guidance on the preparation of LDP policies for transport” February 2019.

Under soundness test C3 – it is not consistent with Planning Policy Statement (PPS) 21, Sustainable Development in the Countryside, Annex 1 - Consequential amendment to Policy AMP 3 of PPS 3 Access, Movement and Parking.

Proposed Minor Changes

Dfl Roads comment (January 2020), PART 1 of the dPS:

Page 141, Key Transport Infrastructure Schemes – LCCC should review the accuracy of the last sentence in this section as the LTS will not allocate residential zonings.

LCCC Proposed Focussed Change January 2021 – MC8A - SP20

Transportation Infrastructure

The Council proposes for clarity, as a minor change, to amend the J&A, page 141, (under Key Transportation Infrastructure Schemes, last sentence) as follows:

“In addition the Local Transport Study will ~~seek to adopt a range of measures to reduce the need for reliance on the private car through the allocation of residential zonings in proximity to services~~ consider the strengths and weaknesses of various modes of transport, including walking, cycling, public transport and roads. This will provide clarity on the transport measures that Dfl expect to deliver during the LDP period to 2032 and which will become evident at Local Policies Plan stage.”

Dfl Roads Response March 2021

Dfl Roads defer to the comments from Dfl - Transport Planning and Modelling Unit / Transport Policy Directorate

Dfl Roads comment (January 2020), PART 1 of the dPS:

Page 141, Park & Ride / Park & Share – LCCC may wish to also include reference to the proposed expansion of the Cairnshill P&R site.

LCCC Proposed Focussed Change January 2021 – MC8B - SP20

Transportation Infrastructure

The Council proposes for clarity, as a minor change, to amend the J&A, page 141, (under Park & Ride/Park & Share, last sentence paragraph 2) as follows:

“The Council recognises the value of the existing Park & Ride sites in supporting a modal shift between private car and public transport usage and supports the proposed schemes at West Lisburn adjacent to the proposed new rail halt; Moira,

adjacent to the railway station; and the extension of ~~other the Sprucefield~~ Park & Ride sites which benefits from planning approval ~~providing 132 additional car parking spaces.~~

Dfl Roads Response March 2021

Dfl Roads is content with the proposed minor change.

Dfl Roads comment (January 2020), PART 1 of the dPS:

Page 143, Car Parking – LCCC should consider reviewing the existing area of parking restraint, along with Dfl, as part of the Local Policies Plan.

LCCC Proposed Focussed Change January 2021 – MC8C - SP20

Transportation Infrastructure

The Council proposes for clarity, as a minor change, to amend the J&A, page 143, (under Car Parking, last sentence) as follows:

“~~Areas of parking restraint along with~~ other measures to reduce the impact of car parking across the Council area will require further detailed assessment at the Local Policies Plan stage.”

Dfl Roads Response March 2021

Dfl Roads is content with the proposed minor change.

Dfl Roads comment (January 2020), PART 2 of the dPS:

Page 92, TRA1, Justification and Amplification, last paragraph – This refers to DCAN 11 ‘Access for People with Disabilities’, which following letter issued by Angus Kerr (Chief Planner & Director of Regional Planning) on 28 August 2019 will cease to have effect as soon as practicable.

LCCC Proposed Focussed Change January 2021 – MC47 - TRA1 Creating an Accessible Environment

It is necessary to remove reference to Development Control Advice Note (DCAN) 11 and draft DCAN11. The Council proposes for clarity, as a minor change, to amend the last paragraph of the J&A of policy TRA1, page 92, as follows:

“Further information on designing for a more accessible environment is set out in the Department’s ~~Development Control Advice Note (DCAN) 11 ‘Access for People with Disabilities’~~, ~~draft DCAN11 ‘Access for All’~~ and ‘Creating Places – Achieving Quality in Residential Developments’ (May 2000) ~~documents.~~”

Dfl Roads Response March 2021

Dfl Roads is content with the removal of the reference to DCAN11. However, Creating Places only provides guidance on the design of new residential developments

The Council should review Policy TRA1, and the remaining Justification and Amplification to ensure it provides policy on accessibility to cover all types of development.

Dfl Roads comment (January 2020), PART 2 of the dPS:

Page 93, TRA2, Justification and Amplification, second last paragraph – refers to the ‘Department’, but this should be the ‘Council’.

LCCC Proposed Focussed Change January 2021 – MC48 - TRA2 Access to Public Roads

The Council proposes for clarity, as a minor change, to amend the second last paragraph of J&A, page 93, to replace the word ‘Department’ with the word ‘Council’

Dfl Roads Response March 2021

Dfl Roads is content with the proposed minor change.

Dfl Roads comment (January 2020), PART 2 of the dPS:

Page 95, Transport Assessment – LCCC should consider including the need monitor, review and possible enforcement in relation to Travel Plans.

LCCC Proposed Focussed Change January 2021 – MC49 - TRA6 Transport Assessment

The Council proposes for clarity, as a minor change, to include the following paragraph in the J&A of Policy TRA6 (first paragraph), page 95, as follows:

“Transport Assessment applies to all forms of development with a significant travel generation impact. A primary aim of the Transport Assessment is to assess accessibility by sustainable modes and to develop measures to maximise use of sustainable modes; only subsequently should the residual traffic be assessed and its impacts ameliorated.”

Dfl Roads Response March 2021

The proposed minor change has not addressed the issue.

The Dfl “Guidance on the preparation of LDP policies for transport” February 2019, page 10/11, “Transport Assessments & Travel Plans” – “Explanation and Justification” states *“It is suggested that Travel Plans, through the setting out of complementary measures can help to mitigate adverse impacts highlighted in by TA’s. It is vital that planning authorities make appropriate provision for the monitoring and enforcement of Travel Plans, particularly where agreed objectives are not met – this may be done through attaching a condition to the planning consent or any legal agreement.”*

Under soundness test C3 - The proposed minor change (above) is not consistent with policy and guidance issued by the Department, namely: Dfl “Guidance on the preparation of LDP policies for transport” February 2019; and; Planning Policy Statement 13 (PPS 13), Transportation and Land Use - General Principle 4.

Dfl Roads comment (January 2020), PART 2 of the dPS:

Page 96, foot note 34 – This refers to DCAN 11 ‘Access for People with Disabilities’, which following letter issued by Angus Kerr (Chief Planner & Director of Regional Planning) on 28 August 2019 will cease to have effect as soon as practicable.

LCCC Proposed Focussed Change January 2021 – MC50 - TRA7 Car Parking and Servicing Arrangements in New Developments

It is necessary to remove reference to Development Control Advice Note (DCAN) 11 and draft DCAN11. The Council proposes for clarity, as a minor change, to amend footnote 34, page 96, as follows:

~~“Department’s Development Control Advice Note 11 ‘Access for People with Disabilities’ (1991), draft DCAN11 ‘Access for All’ (July 2003 and ‘Creating Places – Achieving Quality in Residential Developments’ (May 2000) documents”~~

Dfl Roads Response March 2021

Dfl Roads is content with the removal of the reference to DCAN11. However, Creating Places only provides guidance on the design of new residential developments.

The Council should review Policy TRA1 and the remaining Justification and Amplification to ensure it provides policy on accessibility to cover all types of development.

Dfl Roads comment (January 2020), PART 2 of the dPS:

Page 98, TRA10 - LCCC should review the wording of bullet point a) and provide a broader test of need, in case the Local Transport Plan does not include this level of detail.

LCCC Proposed Focussed Change January 2021 – MC51 - TRA10 Provision of Public and Private Car Parks

The Council proposes for clarity, as a minor change, to amend bullet point a) of Policy TRA10, page 98, as follows: “a) they meet a need identified by the Department’s Local Transport Plan ~~or a comprehensive Car Parking Strategy prepared jointly with the Department, where applicable.”~~

Dfl Roads Response March 2021

Dfl Roads is content with the proposed minor change.

Appendix A

LCCC Draft Plan Strategy (October 2019) – DfI Roads, Eastern Division response

Soundness Test – DfI Roads considers there is a risk to soundness under Consistency Test C3 as the draft Plan Strategy has not taken account of policy and guidance issued by the Department in relation to proposed policy TRA3 Access to Protected Routes, Other Protected Routes – Outside Settlement Limits (see comments on Part 2, bullet point 4)

Part 1

Comments and suggestions – see comments below.

1. Page 34, A Quality Place (bullet point 7) – LCCC should consider using stronger language than “Support.....adequate infrastructure....”,

2. Page 42, Strategic Policy 02 Improving Health and Well-being – LCCC should consider using stronger language when stating “Noise and air quality should also be taken into account when designing schemes. By comparison please note the language used in Regional Development Strategy 2035 RG7 on page 134.

3. Page 45, Strategic Policy 07 Section 76 Planning Agreements – LCCC should include the term “highway infrastructure” in bullet point a). As well as provision, LCCC may also wish to include reference to the developers contributing to the ongoing maintenance of infrastructure.

4. Page 59, Table 2 – LCCC may wish to consider including column headings. LCCC should review the wording used in the “Transport Test” and consider using a stronger term than “potential” “for integrating land use and public transport and walking and cycling routes”, particularly in urban areas which should afford greater opportunity.

5. Page 61, Strategic Housing Allocation – LCCC should review the wording of bullet point 8, which seems to mostly deal with the development management approach towards development applications post zoning, rather than detailing the process of zoning land for housing.

6. Page 80, SMU02 Purdysburn/Knockbracken, bullet point (a) – the A24 Saintfield Road is a Protected Route and therefore any proposed new access or intensification of use of an existing access must be in accordance with the adopted TRA3 (currently PPS3, AMP3) and the SPPS. LCCC should include a reference to the need to link the site to the adjacent Cairnshill Park & Ride site under bullet point f) and in the Justification and Amplification in order to reduce private car use generated from this development site.

7. Page 92 -105, Growing our City, Town Centres, Retailing and Other Uses – LCCC may wish to consider the impact of parking strategies in this section, including DfI Roads feedback dated 08/08/2019.

8. Page 105, Map 10 – LCCC should ensure the Area of Development Potential does not impact on the Road Protection Corridor for the M1/A1 link, which is located just east of this site.

9. **Page 136, Strategic Road Schemes** - LCCC should review the wording used to reflect the fact that the M1/A1 Link and widening of the M1 between Black's Road and Sprucefield are two separate schemes.

10. **Page 137, Post Publication of BMTP** - LCCC should make reference to the proposed Park & Ride site at Millmount that has not been provided, but an alternative site at Dunlady Road that services BRT has been developed.

11. **Page 137, LCCC Car Park Strategy, 2019 (Draft)** – LCCC should include a reference to the need for the car park strategy to contribute to a reduction in private car use.

12. **Page 141, Key Transport Infrastructure Schemes** – LCCC should review the accuracy of the last sentence in this section as the LTS will not allocate residential zonings.

13. **Page 141, Park & Ride / Park & Share** – LCCC may wish to also include reference to the proposed expansion of the Cairnshill P&R site.

14. **Page 143, Car Parking** – LCCC should consider reviewing the existing area of parking restraint, along with Dfl, as part of the Local Policies Plan.

Part 2

Comments and suggestions – see comments below.

1. **Page 92, TRA1, bullet point C)** – Consider including reference to cycling, in line with Dfl Guidance on the Preparation of LDP Policies for Transport (Issued January 2019).

2. **Page 92, TRA1, Justification and Amplification, last paragraph** – This refers to DCAN 11 'Access for People with Disabilities', which following letter issued by Angus Kerr (Chief Planner & Director of Regional Planning) on 28 August 2019 will cease to have effect as soon as practicable.

3. **Page 93, TRA2, Justification and Amplification, second last paragraph** – refers to the 'Department', but this should be the 'Council'.

4. **Page 94, TRA3 Access to Protected Routes, Other Protected Routes – Outside Settlement Limits** – The Plan Strategy as currently drafted would permit direct access onto the Protected Route Network Outside Settlement Limits where access cannot be reasonably obtained from an adjacent minor road. This proposed wording does not align with the Strategic Planning Policy Statement for Northern Ireland (SPPS) and Dfl Guidance on the Preparation of LDP Policies for Transport (issued January 2019). The reason why this is important is the Protected Route Network are main roads that facilitate the efficient movement of traffic over long distances throughout Northern Ireland. These roads are regionally significant, rather than just serving an individual council area. They contribute significantly to economic prosperity by providing efficient links between all the main towns, airports and seaports, and with the Republic of Ireland. LCCC should amend the wording of TRA3 Access to Protected Routes to align with the SPPS and Dfl Guidance.

5. **Page 95, Transport Assessment** – LCCC should consider including the need monitor, review and possible enforcement in relation to Travel Plans.

6. **Page 96, TRA7, bullet point (a)** – LCCC should review the wording of bullet point a) and consider removing the word ‘accompanying’ in reference to Travel Plans.

7. **Page 96, TRA7, bullet points (a-e)** - LCCC should review the wording of the bullet points a) – e) and not having an “or” between each bullet point may suggest that all of these circumstances need to apply in order for a reduced level of car parking provision to be acceptable beyond formal areas of parking restraint.

8. **Page 96, foot note 34** – This refers to DCAN 11 ‘Access for People with Disabilities’, which following letter issued by Angus Kerr (Chief Planner & Director of Regional Planning) on 28 August 2019 will cease to have effect as soon as practicable.

9. **Page 98, TRA10** - LCCC should review the wording of bullet point a) and provide a broader test of need in case the Local Transport Plan does not include this level of detail.

10. LCCC should review the operational policy on Access and Transport in the draft Plan Strategy and include Key Policy Consideration ‘Integration of Land Use and Transportation’, including Justification and Amplification, as outlined in DfI Guidance on the Preparation of LDP Policies for Transport (issued January 2019).

11. **Page 118, AD1** - LCCC should review the wording of sub-bullet point 3. to say ‘could reduce the effectiveness of traffic lights or traffic signs, or’.