

Submitted to **Belfast LDP 2035 - Plan Strategy**

Submitted on **2018-11-15 16:19:11**

## Overview

### 1. Data Protection

**Q1. Please tick to confirm that you have read and understood the privacy notice above.**

I confirm that I have read and understood the privacy notice above and give my consent for Belfast City Council to hold my personal data for the purposes outlined.

**Q2. Do you consent for us to publish your response?**

Yes, with my name and/or organisation

### 2. Your details

**Q3. Are you responding as an individual, as an organisation, or as an agent acting on behalf of an individual, group or organisation?**

**Individual, Organisation or Agent:**

Organisation

**Q4. What is your name?**

**Title:**

Mr

**Full Name:**

Robin Totten

**Q5. What is your telephone number?**

**Telephone number:**

██████████

**Q6. What is your email address?**

**Email:**

████████████████████

**Q7. Did you respond to the previous Preferred Options Paper consultation phase?**

Yes

If yes, and you have your previous response ID (beginning ANON) please enter it here::

### 4. Organisation

**Q9. If you are responding as a representative of a group or organisation, please provide details below:**

**Organisation:**

Translink

**Your Job Title:**

Acting Head of Strategic Planning and Business Change

**Address Line 1:**

Lanyon Place Station

**Line 2:**

East Bridge Street

**Line 3:**

**City:**

Belfast

**Postcode:**

BT1 3PB

**6. Before you submit your comments**

**7. Is the plan sound?**

**Your comments should be set out in full. This will help the independent examiner understand the issues you raise. You will only be able to submit further additional information to the Independent Examination if the Independent Examiner invites you to do so.**

**Q12. Do you consider the Plan Strategy to be sound or unsound?**

I believe it to be unsound

**8b. Unsound**

**Q14a. To which part of the Plan Strategy does your representation relate?**

**Relevant Section or Paragraph::**

**Policy (if relevant):**

RD1 New Residential Developments

**Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:**

P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?, P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?, C3 - Did the council take account of policy and guidance issued by the Department?, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

**Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.**

**Please give your reasons:**

There is an absence of an up to date survey of the transport system and traffic of the district and of a transport plan, both of which would inform the policy requirement for New Residential Developments (RD1c) to demonstrate the provision of, or accessibility and convenience to public transport and walking and cycling infrastructure.

The policy fails to take account of the representation made by Translink to the Preferred Options Paper which stated;

POP VE2

The current zonings should be subjected to an accessibility analysis that takes cognisance of the existing, as well as the planned changes, to bus and rail networks'.

There is an absence of an up to date survey of the transport system and traffic of the district and of a transport plan, both of which would inform the policy requirement for New Residential Developments (RD1c) to demonstrate the provision of, or accessibility and convenience to public transport and walking and cycling infrastructure.

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.

The Council has not undertaken an up to date survey or assessment of the transport needs in the plan area instead it seeks to rely on out of date information.

There is a requirement for the Council to take account of policy and guidance issued by the Department, in this particular context, to take account of the Planning Act (NI) 2011, Strategic Planning Policy Statement and Planning Policy Statement 13.

The Planning Act (Northern Ireland) 2011 Part 8 Section 5(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 LDP 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 allocation 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 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.

The draft Plan Strategy 'Technical Supplement 14 Transportation' (August 2018) sets out the evidence base that has informed the relevant policies within the draft Plan Strategy. The Policy Context section lists the following planning policy documents as being relevant to transportation –

1. Regional Development Strategy 2035
2. Ensuring a Sustainable Transport Future: A New Approach to Regional Transportation
3. Strategic Planning Policy Statement
4. PPS 13 Transportation & Land Use
5. PPS 3 Access, Movement & Parking
6. DCAN 15 Vehicular Access
7. Programme for Government
8. Belfast Urban Area Plan 2001
9. Belfast Metropolitan Transport Plan
10. Belfast Metropolitan Area Plan
11. Belfast Agenda
12. Belfast City Centre Regeneration & Investment Strategy
13. Belfast Air Quality Action Plan 2015 – 2020
14. Car Parking Strategy and Action Plan

Appendices A & C summarise The Regional Transportation Strategy (RTS) 2002-2012 and The Regional Strategic Transport Network Transport Plan 2015 (RSTN TP) respectively.

Whilst Technical Supplement 14 refers to the existing policy context and provides commentary on the 'Transportation Profile' under the headings of Highways and Parking, Public Transport, Cycling and Walking, Belfast Transport Hub, Belfast Rapid Transit, Belfast Bicycle Network, Belfast Bikes, York St Interchange, City Centre Ring Southern Section and Car Parking Strategy; there is no new evidence presented specific to the LDP formulation and no reference to a 'Local Transport Study', (required under SPPS and PPS13) or to a survey having been undertaken of the 'transport system and traffic of the district ' (required under the Planning Act (NI) 2011).

In relation to the above, we note Technical Supplement 14 Transportation (Page 12 , footnotes 5 and 6) reference the 'Travel Survey for Northern Ireland (TSNI) 2014-2016 and Northern Ireland Transport Statistics (NITS) 2015-16. (Statistics from the TSNI are also referenced in Sustainability Appraisal Appendix 5 'Baseline Information for Belfast').

Page 5 of the TSNI states, that is the "only source of information on how, over the region as a whole, people use different forms of transport to meet their travel needs as individuals or family groups....and continues...."Data at Northern Ireland level are robust. When figures are broken down into sub regional level the sample size is reduced. Consequently, data analysis at sub-regional level is limited."

In this context it is questionable whether the use of travel survey statistics compiled at a regional level are sufficiently adequate to inform a survey of the 'transport system and traffic of the district.'

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

- Regional Strategic Network Transport Plan – public consultation in Spring 2019
- Belfast Metropolitan Strategy– public consultation in Autumn 2019
- Belfast Metropolitan Transport Plan – scheduled for consultation 2022

These new plans will supersede the 'Regional Transportation Strategy (RTS) 2002-2012'; the 'Regional Strategic Transport Network Transport Plan 2015 (RSTN TP)' and the 'Belfast Metropolitan Transport Plan' (BMTP) all of which were referred to in the draft Plan Strategy Technical Supplement. The RTS was adopted in July 2002; The RSTN TP was adopted in March 2005; and the BMTP was adopted in November 2004. 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 weakness of relying on these dated Transport Plan plans is acknowledged by Council within the Sustainability Appraisal where the Executive Summary (page 42 paras 7.5 and 7.6) state,

"The influence of other plans, programmes or strategies also restricts our ability to appraise certain effects. As an example, with no up-to-date transport plan for Belfast, the DPS must rely on transport policies from draft BMAP in relation to parking restraint and standards, until such times as further detailed information is available.

As a result, assessment conclusions in some instances will not be based on fact, but on professional judgement, informed by the best available data, together with contributions from statutory consultation bodies and other interested parties. Full details of specific difficulties encountered are set out in the main SA Report."

In the absence in the draft Plan Strategy of a survey of the transport system and traffic of the district and of an up to date transport study, the evidence base relied upon is not robust.

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'.

These matters were brought to the attention of the Council in Translink's response to the Preferred Options Paper dated 14/4/17.

The LDP should 'promote opportunities for improved connectivity and promotion of more sustainable patterns of transport and travel, whilst making land available to facilitate more sustainable patterns of development & travel.'

Under over-arching themes of 'social', 'economic' and 'environmental', the Sustainability Assessment lists 19 no. objectives including to:

"Promote an integrated transport system & encourage sustainable travel" (SA9)

The SA then assesses the environmental effect of each of the objectives. In relation to SA9 it states,

"Facilitating sustainable transport use, managing the road network and parking management through a balanced approach is likely to have significant positive effects, not only on the transport network but also health, wellbeing and air quality."

A further assessment of "Potential Cumulative, Secondary & Synergistic Effects" is undertaken. In relation to SA 9 it states,

On the other hand, the Department for Infrastructure's revised Transport Plan for the Belfast Metropolitan area could have positive synergistic effects in delivering sustainable transport projects, demand management initiatives and behavioural change initiatives. In such a scenario the minor positive effect would be retained overall.

Given that we do not yet know to what extent the Department's plan may affect the plan area and LDP policy, the consolidated score of these cumulative effects remains unknown at this time.

**Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.**

**What would make it sound?:**

Preparation of a robust evidence base to include a 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 and public transport provision.

**Files should be no more than 10MB and in either PDF or Microsoft Word format:**

No file was uploaded

**Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?**

Yes

## 8b. Unsound - Second Submission

### Q14b. To which part of the Plan Strategy does your representation relate?

Relevant Section or Paragraph:

Policy (if relevant):

HOU1 Accommodating New Homes

### Q15b. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:

P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?, P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?, C3 - Did the council take account of policy and guidance issued by the Department?, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

### Q16b. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.

Please give your reasons:

There is an absence of an up to date survey of the transport system and traffic of the district and of a transport plan to support this Policy and Figure 7.2 (Delivery of housing supply); these would inform the 'plan, monitor and manage' approach' to the release of housing land as directed in the SPPS (page 73 para 6.140 and page 74, 2nd bullet). The policy does not fully take account of the representation made by Translink to the Preferred Options Paper which stated;

POP VE2

'The current zonings should be subjected to an accessibility analysis that takes cognisance of the existing, as well as the planned changes, to bus and rail networks'.

There is a requirement for the LDP 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.

The Council has not undertaken an up to date survey or assessment of the transport needs in the plan area instead it seeks to rely on out of date information.

There is a requirement for the Council to take account of policy and guidance issued by the Department, in this particular context, to take account of the Planning Act (NI) 2011, Strategic Planning Policy Statement and Planning Policy Statement 13.

The Planning Act (Northern Ireland) 2011 Part 8 Section 5(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 LDP 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 allocation 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 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.

The draft Plan Strategy 'Technical Supplement 14 Transportation' (August 2018) sets out the evidence base that has informed the relevant policies within the draft Plan Strategy. The Policy Context section lists the following planning policy documents as being relevant to transportation –

1. Regional Development Strategy 2035
2. Ensuring a Sustainable Transport Future: A New Approach to Regional Transportation
3. Strategic Planning Policy Statement
4. PPS 13 Transportation & Land Use
5. PPS 3 Access, Movement & Parking
6. DCAN 15 Vehicular Access
7. Programme for Government
8. Belfast Urban Area Plan 2001
9. Belfast Metropolitan Transport Plan
10. Belfast Metropolitan Area Plan
11. Belfast Agenda
12. Belfast City Centre Regeneration & Investment Strategy
13. Belfast Air Quality Action Plan 2015 – 2020
14. Car Parking Strategy and Action Plan

Appendices A & C summarise The Regional Transportation Strategy (RTS) 2002-2012 and The Regional Strategic Transport Network Transport Plan 2015 (RSTN TP) respectively.

Whilst Technical Supplement 14 refers to the existing policy context and provides commentary on the 'Transportation Profile' under the headings of Highways and Parking, Public Transport, Cycling and Walking, Belfast Transport Hub, Belfast Rapid Transit, Belfast Bicycle Network, Belfast Bikes, York St Interchange, City Centre Ring Southern Section and Car Parking Strategy; there is no new evidence presented specific to the LDP formulation and no reference to a 'Local Transport Study', (required under SPPS and PPS13) or to a survey having been undertaken of the 'transport system and traffic of the district' (required under the Planning Act (NI) 2011).

In relation to the above, we note Technical Supplement 14 Transportation (Page 12, footnotes 5 and 6) reference the 'Travel Survey for Northern Ireland (TSNI) 2014-2016 and Northern Ireland Transport Statistics (NITS) 2015-16. (Statistics from the TSNI are also referenced in Sustainability Appraisal Appendix 5 'Baseline Information for Belfast').

Page 5 of the TSNI states, that is the "only source of information on how, over the region as a whole, people use different forms of transport to meet their travel needs as individuals or family groups....and continues...."Data at Northern Ireland level are robust. When figures are broken down into sub regional level the sample size is reduced. Consequently, data analysis at sub-regional level is limited."

In this context it is questionable whether the use of travel survey statistics compiled at a regional level are sufficiently adequate to inform a survey of the 'transport system and traffic of the district.'

Furthermore, the draft Plan Strategy has been formulated in advance of the 'Regional Strategic Network Transport Plan', the 'Belfast Metropolitan Strategy' and

the 'Belfast Metropolitan Transport Plan' all of which are being prepared by the Department for Infrastructure.

- Regional Strategic Network Transport Plan – public consultation in Spring 2019
- Belfast Metropolitan Strategy– public consultation in Autumn 2019
- Belfast Metropolitan Transport Plan – scheduled for consultation 2022

These new plans will supersede the 'Regional Transportation Strategy (RTS) 2002-2012'; the 'Regional Strategic Transport Network Transport Plan 2015 (RSTN TP)' and the 'Belfast Metropolitan Transport Plan' (BMTP) all of which were referred to in the draft Plan Strategy Technical Supplement. The RTS was adopted in July 2002; The RSTN TP was adopted in March 2005; and the BMTP was adopted in November 2004. 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 weakness of relying on these dated Transport Plan plans is acknowledged by Council within the Sustainability Appraisal where the Executive Summary (page 42 paras 7.5 and 7.6) state,

"The influence of other plans, programmes or strategies also restricts our ability to appraise certain effects. As an example, with no up-to-date transport plan for Belfast, the DPS must rely on transport policies from draft BMAP in relation to parking restraint and standards, until such times as further detailed information is available.

As a result, assessment conclusions in some instances will not be based on fact, but on professional judgement, informed by the best available data, together with contributions from statutory consultation bodies and other interested parties. Full details of specific difficulties encountered are set out in the main SA Report."

In the absence in the draft Plan Strategy of a survey of the transport system and traffic of the district and of an up to date transport study, the evidence base relied upon is not robust.

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'.

These matters were brought to the attention of the Council in Translink's response to the Preferred Options Paper dated 14/4/17.

The LDP should 'promote opportunities for improved connectivity and promotion of more sustainable patterns of transport and travel, whilst making land available to facilitate more sustainable patterns of development & travel.'

Under over-arching themes of 'social', 'economic' and 'environmental', the Sustainability Assessment lists 19 no. objectives including to:

"Promote an integrated transport system & encourage sustainable travel" (SA9)

The SA then assesses the environmental effect of each of the objectives. In relation to SA9 it states,

"Facilitating sustainable transport use, managing the road network and parking management through a balanced approach is likely to have significant positive effects, not only on the transport network but also health, wellbeing and air quality."

A further assessment of "Potential Cumulative, Secondary & Synergistic Effects" is undertaken. In relation to SA 9 it states,

On the other hand, the Department for Infrastructure's revised Transport Plan for the Belfast Metropolitan area could have positive synergistic effects in delivering sustainable transport projects, demand management initiatives and behavioural change initiatives. In such a scenario the minor positive effect would be retained overall.

Given that we do not yet know to what extent the Department's plan may affect the plan area and LDP policy, the consolidated score of these cumulative effects remains unknown at this time.

**Q17b. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.**

**What would make it sound?:**

Preparation of a robust evidence base to include a 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 and public transport provision.

**Files should be no more than 10MB and in either PDF or Microsoft Word format:**

No file was uploaded

**Q18b. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?**

Yes

**8b. Unsound - Third Submission**

**Q14c. To which part of the Plan Strategy does your representation relate?**

**Relevant Section or Paragraph::**

**Policy (if relevant):**

DES2 Master planning for Major Development

**Q15c. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:**

P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?, P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?, C3 - Did the council take account of policy and guidance issued by the Department?, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

**Q16c. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.**

**Please give your reasons:**

There is an absence of an up to date survey of the transport system and traffic of the district and of a transport plan, these would inform the requirement in Policy DES1(h) to promote 'sustainable development that support and encourage walking cycling and access to public transport that maximises connections to the city's network of green and blue infrastructure'

The policy fails to take full account of the representation made by Translink to the Preferred Options Paper which stated;

POP Q21

Placemaking whether it be for new homes or future centres of employment need to be screened for accessibility by modes other than the private car and mitigating measures put in place, be it new infrastructure and /or service support. Promoting travel by more sustainable modes of transport will necessitate the co-operation of adjoining Council areas to facilitate improved infrastructure eg Park and Ride.

Furthermore, expansion of green infrastructure needs to properly consider the potential impact on existing as well as future public transport networks as well as better integrate with these modes.

There is a requirement for the LDP 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.

The Council has not undertaken an up to date survey or assessment of the transport needs in the plan area instead it seeks to rely on out of date information.

There is a requirement for the Council to take account of policy and guidance issued by the Department, in this particular context, to take account of the Planning Act (NI) 2011, Strategic Planning Policy Statement and Planning Policy Statement 13.

The Planning Act (Northern Ireland) 2011 Part 8 Section 5(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 LDP 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 allocation 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 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.

The draft Plan Strategy 'Technical Supplement 14 Transportation' (August 2018) sets out the evidence base that has informed the relevant policies within the draft Plan Strategy. The Policy Context section lists the following planning policy documents as being relevant to transportation –

1. Regional Development Strategy 2035
2. Ensuring a Sustainable Transport Future: A New Approach to Regional Transportation
3. Strategic Planning Policy Statement
4. PPS 13 Transportation & Land Use
5. PPS 3 Access, Movement & Parking
6. DCAN 15 Vehicular Access
7. Programme for Government
8. Belfast Urban Area Plan 2001
9. Belfast Metropolitan Transport Plan
10. Belfast Metropolitan Area Plan
11. Belfast Agenda
12. Belfast City Centre Regeneration & Investment Strategy
13. Belfast Air Quality Action Plan 2015 – 2020
14. Car Parking Strategy and Action Plan

Appendices A & C summarise The Regional Transportation Strategy (RTS) 2002-2012 and The Regional Strategic Transport Network Transport Plan 2015 (RSTN TP) respectively.

Whilst Technical Supplement 14 refers to the existing policy context and provides commentary on the 'Transportation Profile' under the headings of Highways and Parking, Public Transport, Cycling and Walking, Belfast Transport Hub, Belfast Rapid Transit, Belfast Bicycle Network, Belfast Bikes, York St Interchange, City Centre Ring Southern Section and Car Parking Strategy; there is no new evidence presented specific to the LDP formulation and no reference to a 'Local Transport Study', (required under SPPS and PPS13) or to a survey having been undertaken of the 'transport system and traffic of the district' (required under the Planning Act (NI) 2011).

In relation to the above, we note Technical Supplement 14 Transportation (Page 12, footnotes 5 and 6) reference the 'Travel Survey for Northern Ireland (TSNI) 2014-2016 and Northern Ireland Transport Statistics (NITS) 2015-16. (Statistics from the TSNI are also referenced in Sustainability Appraisal Appendix 5 'Baseline Information for Belfast').

Page 5 of the TSNI states, that is the "only source of information on how, over the region as a whole, people use different forms of transport to meet their travel needs as individuals or family groups....and continues...."Data at Northern Ireland level are robust. When figures are broken down into sub regional level the sample size is reduced. Consequently, data analysis at sub-regional level is limited."

In this context it is questionable whether the use of travel survey statistics compiled at a regional level are sufficiently adequate to inform a survey of the 'transport system and traffic of the district.'

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

- Regional Strategic Network Transport Plan – public consultation in Spring 2019
- Belfast Metropolitan Strategy – public consultation in Autumn 2019
- Belfast Metropolitan Transport Plan – scheduled for consultation 2022

These new plans will supersede the 'Regional Transportation Strategy (RTS) 2002-2012'; the 'Regional Strategic Transport Network Transport Plan 2015 (RSTN TP)' and the 'Belfast Metropolitan Transport Plan' (BMTP) all of which were referred to in the draft Plan Strategy Technical Supplement. The RTS was adopted in July 2002; The RSTN TP was adopted in March 2005; and the BMTP was adopted in November 2004. 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 weakness of relying on these dated Transport Plan plans is acknowledged by Council within the Sustainability Appraisal where the Executive Summary (page 42 paras 7.5 and 7.6) state,

"The influence of other plans, programmes or strategies also restricts our ability to appraise certain effects. As an example, with no up-to-date transport plan for Belfast, the DPS must rely on transport policies from draft BMAP in relation to parking restraint and standards, until such times as further detailed information is

available.

As a result, assessment conclusions in some instances will not be based on fact, but on professional judgement, informed by the best available data, together with contributions from statutory consultation bodies and other interested parties. Full details of specific difficulties encountered are set out in the main SA Report.”

In the absence in the draft Plan Strategy of a survey of the transport system and traffic of the district and of an up to date transport study, the evidence base relied upon is not robust.

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’.

These matters were brought to the attention of the Council in Translink’s response to the Preferred Options Paper dated 14/4/17.

The LDP should ‘promote opportunities for improved connectivity and promotion of more sustainable patterns of transport and travel, whilst making land available to facilitate more sustainable patterns of development & travel.’

Under over-arching themes of ‘social’, ‘economic’ and ‘environmental’, the Sustainability Assessment lists 19 no. objectives including to:

“Promote an integrated transport system & encourage sustainable travel” (SA9)

The SA then assesses the environmental effect of each of the objectives. In relation to SA9 it states,

“Facilitating sustainable transport use, managing the road network and parking management through a balanced approach is likely to have significant positive effects, not only on the transport network but also health, wellbeing and air quality.”

A further assessment of “Potential Cumulative, Secondary & Synergistic Effects” is undertaken. In relation to SA 9 it states,

On the other hand, the Department for Infrastructure’s revised Transport Plan for the Belfast Metropolitan area could have positive synergistic effects in delivering sustainable transport projects, demand management initiatives and behavioural change initiatives. In such a scenario the minor positive effect would be retained overall.

Given that we do not yet know to what extent the Department’s plan may affect the plan area and LDP policy, the consolidated score of these cumulative effects remains unknown at this time.

**Q17c. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.**

**What would make it sound?:**

Preparation of a robust evidence base to include a 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 and public transport provision.

**Files should be no more than 10MB and in either PDF or Microsoft Word format:**

No file was uploaded

**Q18c. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?**

Yes

**8b. Unsound - Fourth Submission**

**Q14d. To which part of the Plan Strategy does your representation relate?**

**Relevant Section or Paragraph::**

**Policy (if relevant):**

EC3 Major Employment and Strategic Employment Locations

**Q15d. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:**

P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?, P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?, C3 - Did the council take account of policy and guidance issued by the Department?, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

**Q16d. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.**

**Please give your reasons:**

There is an absence of an up to date survey of the transport system and traffic of the district and of a transport plan, these would inform the sustainability of employment land supply as advocated in Policy SP2 – Sustainable development. The policy fails to take full account of the representation made by Translink to the Preferred Options Paper which stated;

POP Q21

Placemaking whether it be for new homes or future centres of employment need to be screened for accessibility by modes other than the private car and mitigating measures put in place, be it new infrastructure and /or service support. Promoting travel by more sustainable modes of transport will necessitate the co-operation of adjoining Council areas to facilitate improved infrastructure eg Park and Ride.

Furthermore, expansion of green infrastructure needs to properly consider the potential impact on existing as well as future public transport networks as well as better integrate with these modes.

There is a requirement for the LDP 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.

The Council has not undertaken an up to date survey or assessment of the transport needs in the plan area instead it seeks to rely on out of date information.

There is a requirement for the Council to take account of policy and guidance issued by the Department, in this particular context, to take account of the Planning Act (NI) 2011, Strategic Planning Policy Statement and Planning Policy Statement 13.

The Planning Act (Northern Ireland) 2011 Part 8 Section 5(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 LDP 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 allocation 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 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.

The draft Plan Strategy 'Technical Supplement 14 Transportation' (August 2018) sets out the evidence base that has informed the relevant policies within the draft Plan Strategy. The Policy Context section lists the following planning policy documents as being relevant to transportation –

1. Regional Development Strategy 2035
2. Ensuring a Sustainable Transport Future: A New Approach to Regional Transportation
3. Strategic Planning Policy Statement
4. PPS 13 Transportation & Land Use
5. PPS 3 Access, Movement & Parking
6. DCAN 15 Vehicular Access
7. Programme for Government
8. Belfast Urban Area Plan 2001
9. Belfast Metropolitan Transport Plan
10. Belfast Metropolitan Area Plan
11. Belfast Agenda
12. Belfast City Centre Regeneration & Investment Strategy
13. Belfast Air Quality Action Plan 2015 – 2020
14. Car Parking Strategy and Action Plan

Appendices A & C summarise The Regional Transportation Strategy (RTS) 2002-2012 and The Regional Strategic Transport Network Transport Plan 2015 (RSTN TP) respectively.

Whilst Technical Supplement 14 refers to the existing policy context and provides commentary on the 'Transportation Profile' under the headings of Highways and Parking, Public Transport, Cycling and Walking, Belfast Transport Hub, Belfast Rapid Transit, Belfast Bicycle Network, Belfast Bikes, York St Interchange, City Centre Ring Southern Section and Car Parking Strategy; there is no new evidence presented specific to the LDP formulation and no reference to a 'Local Transport Study', (required under SPPS and PPS13) or to a survey having been undertaken of the 'transport system and traffic of the district' (required under the Planning Act (NI) 2011).

In relation to the above, we note Technical Supplement 14 Transportation (Page 12, footnotes 5 and 6) reference the 'Travel Survey for Northern Ireland (TSNI) 2014-2016 and Northern Ireland Transport Statistics (NITS) 2015-16. (Statistics from the TSNI are also referenced in Sustainability Appraisal Appendix 5 'Baseline Information for Belfast').

Page 5 of the TSNI states, that is the "only source of information on how, over the region as a whole, people use different forms of transport to meet their travel needs as individuals or family groups....and continues...."Data at Northern Ireland level are robust. When figures are broken down into sub regional level the sample size is reduced. Consequently, data analysis at sub-regional level is limited."

In this context it is questionable whether the use of travel survey statistics compiled at a regional level are sufficiently adequate to inform a survey of the 'transport system and traffic of the district.'

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

- Regional Strategic Network Transport Plan – public consultation in Spring 2019
- Belfast Metropolitan Strategy – public consultation in Autumn 2019
- Belfast Metropolitan Transport Plan – scheduled for consultation 2022

These new plans will supersede the 'Regional Transportation Strategy (RTS) 2002-2012'; the 'Regional Strategic Transport Network Transport Plan 2015 (RSTN TP)' and the 'Belfast Metropolitan Transport Plan' (BMTP) all of which were referred to in the draft Plan Strategy Technical Supplement. The RTS was adopted in July 2002; The RSTN TP was adopted in March 2005; and the BMTP was adopted in November 2004. 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 weakness of relying on these dated Transport Plan plans is acknowledged by Council within the Sustainability Appraisal where the Executive Summary (page 42 paras 7.5 and 7.6) state,

"The influence of other plans, programmes or strategies also restricts our ability to appraise certain effects. As an example, with no up-to-date transport plan for Belfast, the DPS must rely on transport policies from draft BMAP in relation to parking restraint and standards, until such times as further detailed information is available.

As a result, assessment conclusions in some instances will not be based on fact, but on professional judgement, informed by the best available data, together with contributions from statutory consultation bodies and other interested parties. Full details of specific difficulties encountered are set out in the main SA Report."

In the absence in the draft Plan Strategy of a survey of the transport system and traffic of the district and of an up to date transport study, the evidence base relied upon is not robust.

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'.

These matters were brought to the attention of the Council in Translink's response to the Preferred Options Paper dated 14/4/17.

The LDP should 'promote opportunities for improved connectivity and promotion of more sustainable patterns of transport and travel, whilst making land available to facilitate more sustainable patterns of development & travel.'

Under over-arching themes of 'social', 'economic' and 'environmental', the Sustainability Assessment lists 19 no. objectives including to:

"Promote an integrated transport system & encourage sustainable travel" (SA9)

The SA then assesses the environmental effect of each of the objectives. In relation to SA9 it states,

"Facilitating sustainable transport use, managing the road network and parking management through a balanced approach is likely to have significant positive effects, not only on the transport network but also health, wellbeing and air quality."

A further assessment of "Potential Cumulative, Secondary & Synergistic Effects" is undertaken. In relation to SA 9 it states,

On the other hand, the Department for Infrastructure's revised Transport Plan for the Belfast Metropolitan area could have positive synergistic effects in delivering sustainable transport projects, demand management initiatives and behavioural change initiatives. In such a scenario the minor positive effect would be retained overall.

Given that we do not yet know to what extent the Department's plan may affect the plan area and LDP policy, the consolidated score of these cumulative effects remains unknown at this time.

**Q17d. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.**

**What would make it sound?:**

Preparation of a robust evidence base to include a 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 and public transport provision.

**Files should be no more than 10MB and in either PDF or Microsoft Word format:**

No file was uploaded

**Q18d. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?**

Yes

**8b. Unsound - Fifth Submission**

**Q14e. To which part of the Plan Strategy does your representation relate?**

**Relevant Section or Paragraph:**

**Policy (if relevant):**

TRAN5 New Transport Schemes

**Q15e. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:**

P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?, P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?, C3 - Did the council take account of policy and guidance issued by the Department?, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

**Q16e. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.**

**Please give your reasons:**

There is an absence of an up to date survey of the transport system and traffic of the district and of a transport plan, both of which would inform the policy to 'safeguard land required to implement new transport proposals or planned improvements' including 'enhanced or new public transport services, park and ride proposals and road schemes'.

The policy fails to fully take account of the representation made by Translink to the Preferred Options Paper which stated;

POP SRC6

It should be recognised that significant improvements to the road network can give rise to disbenefits as well as benefits in the surrounding network, as traffic re-distributes. This needs to be properly evaluated by a properly calibrated and validated Transport Model.

There is an absence of an up to date survey of the transport system and traffic of the district and of a transport plan, both of which would inform the policy requirement for New Residential Developments (RD1c) to demonstrate the provision of, or accessibility and convenience to public transport and walking and cycling infrastructure.

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.

The Council has not undertaken an up to date survey or assessment of the transport needs in the plan area instead it seeks to rely on out of date information.

There is a requirement for the Council to take account of policy and guidance issued by the Department, in this particular context, to take account of the Planning Act (NI) 2011, Strategic Planning Policy Statement and Planning Policy Statement 13.

The Planning Act (Northern Ireland) 2011 Part 8 Section 5(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 LDP 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 allocation 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 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.

The draft Plan Strategy 'Technical Supplement 14 Transportation' (August 2018) sets out the evidence base that has informed the relevant policies within the draft Plan Strategy. The Policy Context section lists the following planning policy documents as being relevant to transportation –

1. Regional Development Strategy 2035
2. Ensuring a Sustainable Transport Future: A New Approach to Regional Transportation
3. Strategic Planning Policy Statement
4. PPS 13 Transportation & Land Use

5. PPS 3 Access, Movement & Parking
6. DCAN 15 Vehicular Access
7. Programme for Government
8. Belfast Urban Area Plan 2001
9. Belfast Metropolitan Transport Plan
10. Belfast Metropolitan Area Plan
11. Belfast Agenda
12. Belfast City Centre Regeneration & Investment Strategy
13. Belfast Air Quality Action Plan 2015 – 2020
14. Car Parking Strategy and Action Plan

Appendices A & C summarise The Regional Transportation Strategy (RTS) 2002-2012 and The Regional Strategic Transport Network Transport Plan 2015 (RSTN TP) respectively.

Whilst Technical Supplement 14 refers to the existing policy context and provides commentary on the 'Transportation Profile' under the headings of Highways and Parking, Public Transport, Cycling and Walking, Belfast Transport Hub, Belfast Rapid Transit, Belfast Bicycle Network, Belfast Bikes, York St Interchange, City Centre Ring Southern Section and Car Parking Strategy; there is no new evidence presented specific to the LDP formulation and no reference to a 'Local Transport Study', (required under SPPS and PPS13) or to a survey having been undertaken of the 'transport system and traffic of the district' (required under the Planning Act (NI) 2011).

In relation to the above, we note Technical Supplement 14 Transportation (Page 12, footnotes 5 and 6) reference the 'Travel Survey for Northern Ireland (TSNI) 2014-2016 and Northern Ireland Transport Statistics (NITS) 2015-16. (Statistics from the TSNI are also referenced in Sustainability Appraisal Appendix 5 'Baseline Information for Belfast').

Page 5 of the TSNI states, that is the "only source of information on how, over the region as a whole, people use different forms of transport to meet their travel needs as individuals or family groups....and continues...."Data at Northern Ireland level are robust. When figures are broken down into sub regional level the sample size is reduced. Consequently, data analysis at sub-regional level is limited."

In this context it is questionable whether the use of travel survey statistics compiled at a regional level are sufficiently adequate to inform a survey of the 'transport system and traffic of the district.'

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

- Regional Strategic Network Transport Plan – public consultation in Spring 2019
- Belfast Metropolitan Strategy– public consultation in Autumn 2019
- Belfast Metropolitan Transport Plan – scheduled for consultation 2022

These new plans will supersede the 'Regional Transportation Strategy (RTS) 2002-2012'; the 'Regional Strategic Transport Network Transport Plan 2015 (RSTN TP)' and the 'Belfast Metropolitan Transport Plan' (BMTP) all of which were referred to in the draft Plan Strategy Technical Supplement. The RTS was adopted in July 2002; The RSTN TP was adopted in March 2005; and the BMTP was adopted in November 2004. 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 weakness of relying on these dated Transport Plan plans is acknowledged by Council within the Sustainability Appraisal where the Executive Summary (page 42 paras 7.5 and 7.6) state,

"The influence of other plans, programmes or strategies also restricts our ability to appraise certain effects. As an example, with no up-to-date transport plan for Belfast, the DPS must rely on transport policies from draft BMAP in relation to parking restraint and standards, until such times as further detailed information is available.

As a result, assessment conclusions in some instances will not be based on fact, but on professional judgement, informed by the best available data, together with contributions from statutory consultation bodies and other interested parties. Full details of specific difficulties encountered are set out in the main SA Report."

In the absence in the draft Plan Strategy of a survey of the transport system and traffic of the district and of an up to date transport study, the evidence base relied upon is not robust.

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'.

These matters were brought to the attention of the Council in Translink's response to the Preferred Options Paper dated 14/4/17.

The LDP should 'promote opportunities for improved connectivity and promotion of more sustainable patterns of transport and travel, whilst making land available to facilitate more sustainable patterns of development & travel.'

Under over-arching themes of 'social', 'economic' and 'environmental', the Sustainability Assessment lists 19 no. objectives including to:

"Promote an integrated transport system & encourage sustainable travel" (SA9)

The SA then assesses the environmental effect of each of the objectives. In relation to SA9 it states,

"Facilitating sustainable transport use, managing the road network and parking management through a balanced approach is likely to have significant positive effects, not only on the transport network but also health, wellbeing and air quality."

A further assessment of "Potential Cumulative, Secondary & Synergistic Effects" is undertaken. In relation to SA 9 it states,

On the other hand, the Department for Infrastructure's revised Transport Plan for the Belfast Metropolitan area could have positive synergistic effects in delivering sustainable transport projects, demand management initiatives and behavioural change initiatives. In such a scenario the minor positive effect would be retained overall.

Given that we do not yet know to what extent the Department's plan may affect the plan area and LDP policy, the consolidated score of these cumulative effects remains unknown at this time.

**Q17e. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.**

**What would make it sound?:**

Preparation of a robust evidence base to include a 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 and public transport provision.

**Files should be no more than 10MB and in either PDF or Microsoft Word format:**

No file was uploaded

**Q18e. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?**

Yes

## **8b. Unsound - Sixth Submission**

**Q14a. To which part of the Plan Strategy does your representation relate?**

**Relevant Section or Paragraph:**

**Policy (if relevant):**

TRAN7 Access to Protected Routes

**Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:**

P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?, C3 - Did the council take account of policy and guidance issued by the Department?, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

**Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.**

**Please give your reasons:**

There is an absence of an up to date survey of the transport system and traffic of the district and of a transport plan, would inform the provisions of the policy which makes no provision for public transport facilities, such as Park and Ride facilities, to access protected routes.

There is a requirement for the LDP 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.

The Council has not undertaken an up to date survey or assessment of the transport needs in the plan area instead it seeks to rely on out of date information.

There is a requirement for the Council to take account of policy and guidance issued by the Department, in this particular context, to take account of the Planning Act (NI) 2011, Strategic Planning Policy Statement and Planning Policy Statement 13.

The Planning Act (Northern Ireland) 2011 Part 8 Section 5(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 LDP 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 allocation 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 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.

The draft Plan Strategy 'Technical Supplement 14 Transportation' (August 2018) sets out the evidence base that has informed the relevant policies within the draft Plan Strategy. The Policy Context section lists the following planning policy documents as being relevant to transportation –

1. Regional Development Strategy 2035
2. Ensuring a Sustainable Transport Future: A New Approach to Regional Transportation
3. Strategic Planning Policy Statement
4. PPS 13 Transportation & Land Use
5. PPS 3 Access, Movement & Parking
6. DCAN 15 Vehicular Access
7. Programme for Government
8. Belfast Urban Area Plan 2001
9. Belfast Metropolitan Transport Plan
10. Belfast Metropolitan Area Plan
11. Belfast Agenda
12. Belfast City Centre Regeneration & Investment Strategy
13. Belfast Air Quality Action Plan 2015 – 2020
14. Car Parking Strategy and Action Plan

Appendices A & C summarise The Regional Transportation Strategy (RTS) 2002-2012 and The Regional Strategic Transport Network Transport Plan 2015 (RSTN TP) respectively.

Whilst Technical Supplement 14 refers to the existing policy context and provides commentary on the 'Transportation Profile' under the headings of Highways and Parking, Public Transport, Cycling and Walking, Belfast Transport Hub, Belfast Rapid Transit, Belfast Bicycle Network, Belfast Bikes, York St Interchange, City Centre Ring Southern Section and Car Parking Strategy; there is no new evidence presented specific to the LDP formulation and no reference to a 'Local Transport Study', (required under SPPS and PPS13) or to a survey having been undertaken of the 'transport system and traffic of the district' (required under the Planning Act (NI) 2011).

In relation to the above, we note Technical Supplement 14 Transportation (Page 12, footnotes 5 and 6) reference the 'Travel Survey for Northern Ireland (TSNI) 2014-2016 and Northern Ireland Transport Statistics (NITS) 2015-16. (Statistics from the TSNI are also referenced in Sustainability Appraisal Appendix 5 'Baseline Information for Belfast').

Page 5 of the TSNI states, that is the "only source of information on how, over the region as a whole, people use different forms of transport to meet their travel needs as individuals or family groups....and continues...."Data at Northern Ireland level are robust. When figures are broken down into sub regional level the

sample size is reduced. Consequently, data analysis at sub-regional level is limited.”

In this context it is questionable whether the use of travel survey statistics compiled at a regional level are sufficiently adequate to inform a survey of the ‘transport system and traffic of the district.’

Furthermore, the draft Plan Strategy has been formulated in advance of the ‘Regional Strategic Network Transport Plan’, the ‘Belfast Metropolitan Strategy’ and the ‘Belfast Metropolitan Transport Plan’ all of which are being prepared by the Department for Infrastructure.

- Regional Strategic Network Transport Plan – public consultation in Spring 2019
- Belfast Metropolitan Strategy– public consultation in Autumn 2019
- Belfast Metropolitan Transport Plan – scheduled for consultation 2022

These new plans will supersede the ‘Regional Transportation Strategy (RTS) 2002-2012’; the ‘Regional Strategic Transport Network Transport Plan 2015 (RSTN TP)’ and the ‘Belfast Metropolitan Transport Plan’ (BMTP) all of which were referred to in the draft Plan Strategy Technical Supplement. The RTS was adopted in July 2002; The RSTN TP was adopted in March 2005; and the BMTP was adopted in November 2004. 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 weakness of relying on these dated Transport Plan plans is acknowledged by Council within the Sustainability Appraisal where the Executive Summary (page 42 paras 7.5 and 7.6) state,

“The influence of other plans, programmes or strategies also restricts our ability to appraise certain effects. As an example, with no up-to-date transport plan for Belfast, the DPS must rely on transport policies from draft BMAP in relation to parking restraint and standards, until such times as further detailed information is available.

As a result, assessment conclusions in some instances will not be based on fact, but on professional judgement, informed by the best available data, together with contributions from statutory consultation bodies and other interested parties. Full details of specific difficulties encountered are set out in the main SA Report.”

In the absence in the draft Plan Strategy of a survey of the transport system and traffic of the district and of an up to date transport study, the evidence base relied upon is not robust.

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’.

These matters were brought to the attention of the Council in Translink’s response to the Preferred Options Paper dated 14/4/17.

The LDP should ‘promote opportunities for improved connectivity and promotion of more sustainable patterns of transport and travel, whilst making land available to facilitate more sustainable patterns of development & travel.’

Under over-arching themes of ‘social’, ‘economic’ and ‘environmental’, the Sustainability Assessment lists 19 no. objectives including to:

“Promote an integrated transport system & encourage sustainable travel” (SA9)

The SA then assesses the environmental effect of each of the objectives. In relation to SA9 it states,

“Facilitating sustainable transport use, managing the road network and parking management through a balanced approach is likely to have significant positive effects, not only on the transport network but also health, wellbeing and air quality.”

A further assessment of “Potential Cumulative, Secondary & Synergistic Effects” is undertaken. In relation to SA 9 it states,

On the other hand, the Department for Infrastructure’s revised Transport Plan for the Belfast Metropolitan area could have positive synergistic effects in delivering sustainable transport projects, demand management initiatives and behavioural change initiatives. In such a scenario the minor positive effect would be retained overall.

Given that we do not yet know to what extent the Department’s plan may affect the plan area and LDP policy, the consolidated score of these cumulative effects remains unknown at this time.

**Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.**

**What would make it sound?:**

Preparation of a robust evidence base to include a 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 and public transport provision.

**Files should be no more than 10MB and in either PDF or Microsoft Word format:**

No file was uploaded

**Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?**

Yes

**8b. Unsound - Seventh Submission**

**Q14a. To which part of the Plan Strategy does your representation relate?**

**Relevant Section or Paragraph::**

**Policy (if relevant):**

TRAN8 Car Parking and Servicing Arrangements

**Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:**

P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?, C3 - Did the council take account of policy and guidance issued by the Department?, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

**Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.**

**Please give your reasons:**

There is an absence of an up to date survey of the transport system and traffic of the district and of a transport plan, both of which would support the policy by providing a robust evidence base to inform more a detailed car parking and servicing policy which would give clear direction on acceptable car parking and servicing arrangements. For example, servicing can have a negative impact on public transport provision were public transport routes are impeded by service vehicles.

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.

The Council has not undertaken an up to date survey or assessment of the transport needs in the plan area instead it seeks to rely on out of date information.

There is a requirement for the Council to take account of policy and guidance issued by the Department, in this particular context, to take account of the Planning Act (NI) 2011, Strategic Planning Policy Statement and Planning Policy Statement 13.

The Planning Act (Northern Ireland) 2011 Part 8 Section 5(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 LDP 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 allocation 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 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.

The draft Plan Strategy 'Technical Supplement 14 Transportation' (August 2018) sets out the evidence base that has informed the relevant policies within the draft Plan Strategy. The Policy Context section lists the following planning policy documents as being relevant to transportation –

1. Regional Development Strategy 2035
2. Ensuring a Sustainable Transport Future: A New Approach to Regional Transportation
3. Strategic Planning Policy Statement
4. PPS 13 Transportation & Land Use
5. PPS 3 Access, Movement & Parking
6. DCAN 15 Vehicular Access
7. Programme for Government
8. Belfast Urban Area Plan 2001
9. Belfast Metropolitan Transport Plan
10. Belfast Metropolitan Area Plan
11. Belfast Agenda
12. Belfast City Centre Regeneration & Investment Strategy
13. Belfast Air Quality Action Plan 2015 – 2020
14. Car Parking Strategy and Action Plan

Appendices A & C summarise The Regional Transportation Strategy (RTS) 2002-2012 and The Regional Strategic Transport Network Transport Plan 2015 (RSTN TP) respectively.

Whilst Technical Supplement 14 refers to the existing policy context and provides commentary on the 'Transportation Profile' under the headings of Highways and Parking, Public Transport, Cycling and Walking, Belfast Transport Hub, Belfast Rapid Transit, Belfast Bicycle Network, Belfast Bikes, York St Interchange, City Centre Ring Southern Section and Car Parking Strategy; there is no new evidence presented specific to the LDP formulation and no reference to a 'Local Transport Study', (required under SPPS and PPS13) or to a survey having been undertaken of the 'transport system and traffic of the district' (required under the Planning Act (NI) 2011).

In relation to the above, we note Technical Supplement 14 Transportation (Page 12, footnotes 5 and 6) reference the 'Travel Survey for Northern Ireland (TSNI) 2014-2016 and Northern Ireland Transport Statistics (NITS) 2015-16. (Statistics from the TSNI are also referenced in Sustainability Appraisal Appendix 5 'Baseline Information for Belfast').

Page 5 of the TSNI states, that is the "only source of information on how, over the region as a whole, people use different forms of transport to meet their travel needs as individuals or family groups....and continues...."Data at Northern Ireland level are robust. When figures are broken down into sub regional level the sample size is reduced. Consequently, data analysis at sub-regional level is limited."

In this context it is questionable whether the use of travel survey statistics compiled at a regional level are sufficiently adequate to inform a survey of the 'transport system and traffic of the district.'

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

- Regional Strategic Network Transport Plan – public consultation in Spring 2019
- Belfast Metropolitan Strategy– public consultation in Autumn 2019
- Belfast Metropolitan Transport Plan – scheduled for consultation 2022

These new plans will supersede the 'Regional Transportation Strategy (RTS) 2002-2012'; the 'Regional Strategic Transport Network Transport Plan 2015 (RSTN TP)' and the 'Belfast Metropolitan Transport Plan' (BMTP) all of which were referred to in the draft Plan Strategy Technical Supplement. The RTS was adopted in July 2002; The RSTN TP was adopted in March 2005; and the BMTP was adopted in November 2004. 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 weakness of relying on these dated Transport Plan plans is acknowledged by Council within the Sustainability Appraisal where the Executive Summary (page 42 paras 7.5 and 7.6) state,

"The influence of other plans, programmes or strategies also restricts our ability to appraise certain effects. As an example, with no up-to-date transport plan for Belfast, the DPS must rely on transport policies from draft BMAP in relation to parking restraint and standards, until such times as further detailed information is available.

As a result, assessment conclusions in some instances will not be based on fact, but on professional judgement, informed by the best available data, together with contributions from statutory consultation bodies and other interested parties. Full details of specific difficulties encountered are set out in the main SA

Report.”

In the absence in the draft Plan Strategy of a survey of the transport system and traffic of the district and of an up to date transport study, the evidence base relied upon is not robust.

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’.

These matters were brought to the attention of the Council in Translink’s response to the Preferred Options Paper dated 14/4/17.

The LDP should ‘promote opportunities for improved connectivity and promotion of more sustainable patterns of transport and travel, whilst making land available to facilitate more sustainable patterns of development & travel.’

Under over-arching themes of ‘social’, ‘economic’ and ‘environmental’, the Sustainability Assessment lists 19 no. objectives including to:

“Promote an integrated transport system & encourage sustainable travel” (SA9)

The SA then assesses the environmental effect of each of the objectives. In relation to SA9 it states,

“Facilitating sustainable transport use, managing the road network and parking management through a balanced approach is likely to have significant positive effects, not only on the transport network but also health, wellbeing and air quality.”

A further assessment of “Potential Cumulative, Secondary & Synergistic Effects” is undertaken. In relation to SA 9 it states,

On the other hand, the Department for Infrastructure’s revised Transport Plan for the Belfast Metropolitan area could have positive synergistic effects in delivering sustainable transport projects, demand management initiatives and behavioural change initiatives. In such a scenario the minor positive effect would be retained overall.

Given that we do not yet know to what extent the Department’s plan may affect the plan area and LDP policy, the consolidated score of these cumulative effects remains unknown at this time.

**Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.**

**What would make it sound?:**

Preparation of a robust evidence base to include a survey of the transport system and traffic of the district and the preparation of a local transport study in order to determine the impacts that the proposed car parking guidelines would have on the provision of public transport and on the highway network.

**Files should be no more than 10MB and in either PDF or Microsoft Word format:**

No file was uploaded

**Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?**

Yes

**8b. Unsound - Eighth Submission**

**Q14a. To which part of the Plan Strategy does your representation relate?**

**Relevant Section or Paragraph:**

**Policy (if relevant):**

TRAN9 Parking Standards with area of Parking Restraint

**Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:**

P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?, P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?, C3 - Did the council take account of policy and guidance issued by the Department?, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

**Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.**

**Please give your reasons:**

There is an absence of an up to date survey of the transport system and traffic of the district and of a transport plan, both of which would provide a robust evidence base to inform the policy on parking standards which is needed to support the Plan’s strategic policies on Environmental resilience (SP6) and Connectivity (SP7).

The policy fails to take account of the representation made by Translink to the Preferred Options Paper which stated that the principles are sound but any potential interventions would appear to be delayed pending further studies. The capacity of Belfast’s road networks in the AM and PM peak periods is out of sync with car parking availability, particularly on the edge of the City Centre core. Pro-active provision of residential parking schemes, etc. need to be applied now in tandem with delivery of more Park & Ride capacity on rail and bus routes, otherwise network resilience will continue to worsen and affect bus timetables / schedules reducing their attractiveness as a viable alternative mode.

The policy proposes outdated and unsustainable city centre parking policy which fails to take account of policy issued by the Department in the SPPS which advised (para 6.297, 4th bullet point) that the regional strategic objectives for transportation and land use planning are to;

‘Promote parking policies that will assist in reducing reliance on the private car and help tackle growing congestion’.

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.

The Council has not undertaken an up to date survey or assessment of the transport needs in the plan area instead it seeks to rely on out of date information.

There is a requirement for the Council to take account of policy and guidance issued by the Department, in this particular context, to take account of the Planning Act (NI) 2011, Strategic Planning Policy Statement and Planning Policy Statement 13.

The Planning Act (Northern Ireland) 2011 Part 8 Section 5(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 LDP 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 allocation 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 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.

The draft Plan Strategy 'Technical Supplement 14 Transportation' (August 2018) sets out the evidence base that has informed the relevant policies within the draft Plan Strategy. The Policy Context section lists the following planning policy documents as being relevant to transportation –

1. Regional Development Strategy 2035
2. Ensuring a Sustainable Transport Future: A New Approach to Regional Transportation
3. Strategic Planning Policy Statement
4. PPS 13 Transportation & Land Use
5. PPS 3 Access, Movement & Parking
6. DCAN 15 Vehicular Access
7. Programme for Government
8. Belfast Urban Area Plan 2001
9. Belfast Metropolitan Transport Plan
10. Belfast Metropolitan Area Plan
11. Belfast Agenda
12. Belfast City Centre Regeneration & Investment Strategy
13. Belfast Air Quality Action Plan 2015 – 2020
14. Car Parking Strategy and Action Plan

Appendices A & C summarise The Regional Transportation Strategy (RTS) 2002-2012 and The Regional Strategic Transport Network Transport Plan 2015 (RSTN TP) respectively.

Whilst Technical Supplement 14 refers to the existing policy context and provides commentary on the 'Transportation Profile' under the headings of Highways and Parking, Public Transport, Cycling and Walking, Belfast Transport Hub, Belfast Rapid Transit, Belfast Bicycle Network, Belfast Bikes, York St Interchange, City Centre Ring Southern Section and Car Parking Strategy; there is no new evidence presented specific to the LDP formulation and no reference to a 'Local Transport Study', (required under SPPS and PPS13) or to a survey having been undertaken of the 'transport system and traffic of the district' (required under the Planning Act (NI) 2011).

In relation to the above, we note Technical Supplement 14 Transportation (Page 12, footnotes 5 and 6) reference the 'Travel Survey for Northern Ireland (TSNI) 2014-2016 and Northern Ireland Transport Statistics (NITS) 2015-16. (Statistics from the TSNI are also referenced in Sustainability Appraisal Appendix 5 'Baseline Information for Belfast').

Page 5 of the TSNI states, that is the "only source of information on how, over the region as a whole, people use different forms of transport to meet their travel needs as individuals or family groups....and continues...."Data at Northern Ireland level are robust. When figures are broken down into sub regional level the sample size is reduced. Consequently, data analysis at sub-regional level is limited."

In this context it is questionable whether the use of travel survey statistics compiled at a regional level are sufficiently adequate to inform a survey of the 'transport system and traffic of the district.'

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

- Regional Strategic Network Transport Plan – public consultation in Spring 2019
- Belfast Metropolitan Strategy– public consultation in Autumn 2019
- Belfast Metropolitan Transport Plan – scheduled for consultation 2022

These new plans will supersede the 'Regional Transportation Strategy (RTS) 2002-2012'; the 'Regional Strategic Transport Network Transport Plan 2015 (RSTN TP)' and the 'Belfast Metropolitan Transport Plan' (BMTP) all of which were referred to in the draft Plan Strategy Technical Supplement. The RTS was adopted in July 2002; The RSTN TP was adopted in March 2005; and the BMTP was adopted in November 2004. 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 weakness of relying on these dated Transport Plan plans is acknowledged by Council within the Sustainability Appraisal where the Executive Summary (page 42 paras 7.5 and 7.6) state,

"The influence of other plans, programmes or strategies also restricts our ability to appraise certain effects. As an example, with no up-to-date transport plan for Belfast, the DPS must rely on transport policies from draft BMAP in relation to parking restraint and standards, until such times as further detailed information is available.

As a result, assessment conclusions in some instances will not be based on fact, but on professional judgement, informed by the best available data, together with contributions from statutory consultation bodies and other interested parties. Full details of specific difficulties encountered are set out in the main SA Report."

In the absence in the draft Plan Strategy of a survey of the transport system and traffic of the district and of an up to date transport study, the evidence base relied upon is not robust.

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'.

These matters were brought to the attention of the Council in Translink's response to the Preferred Options Paper dated 14/4/17.

The LDP should 'promote opportunities for improved connectivity and promotion of more sustainable patterns of transport and travel, whilst making land available to facilitate more sustainable patterns of development & travel.'

Under over-arching themes of 'social', 'economic' and 'environmental', the Sustainability Assessment lists 19 no. objectives including to:

"Promote an integrated transport system & encourage sustainable travel" (SA9)

The SA then assesses the environmental effect of each of the objectives. In relation to SA9 it states,

"Facilitating sustainable transport use, managing the road network and parking management through a balanced approach is likely to have significant positive effects, not only on the transport network but also health, wellbeing and air quality."

A further assessment of "Potential Cumulative, Secondary & Synergistic Effects" is undertaken. In relation to SA 9 it states,

On the other hand, the Department for Infrastructure's revised Transport Plan for the Belfast Metropolitan area could have positive synergistic effects in delivering sustainable transport projects, demand management initiatives and behavioural change initiatives. In such a scenario the minor positive effect would be retained overall.

Given that we do not yet know to what extent the Department's plan may affect the plan area and LDP policy, the consolidated score of these cumulative effects remains unknown at this time.

**Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.**

**What would make it sound?:**

Preparation of a robust evidence base to include a survey of the transport system and traffic of the district and the preparation of a local transport study in order to determine the impact that the proposed car parking guidelines would have on the provision of public transport and on the highway network.

**Files should be no more than 10MB and in either PDF or Microsoft Word format:**

No file was uploaded

**Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?**

Yes

**8b. Unsound - Ninth Submission**

**Q14a. To which part of the Plan Strategy does your representation relate?**

**Relevant Section or Paragraph:**

**Policy (if relevant):**

TRAN11 Provision of Public and Private Car parks

**Q15a. If you consider the Plan Strategy to be unsound, please identify which test(s) of soundness your representation relates, having regard to Development Plan Practice Note 6:**

P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?, P3 - Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?, C3 - Did the council take account of policy and guidance issued by the Department?, CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

**Q16a. Please give details of why you consider the Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as precise as possible.**

**Please give your reasons:**

There is an absence of an up to date survey of the transport system and traffic of the district and of a transport plan which would provide a robust evidence base to inform a car parking strategy which would include future Park and Ride provision and which would support the commitment at para 9.4.3 where the Council 'recognises that a co-ordinated approach is required between the council and DFI as well as neighbouring authorities across the sub region to deliver the transportation vision'.

The policy does not take account of the representation made by Translink to the Preferred Options Paper which stated;

POP Q21

Placemaking whether it be for new homes or future centres of employment need to be screened for accessibility by modes other than the private car and mitigating measures put in place, be it new infrastructure and /or service support. Promoting travel by more sustainable modes of transport will necessitate the co-operation of adjoining Council Areas to facilitate improved infrastructure eg Park and Ride.

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.

The Council has not undertaken an up to date survey or assessment of the transport needs in the plan area instead it seeks to rely on out of date information.

There is a requirement for the Council to take account of policy and guidance issued by the Department, in this particular context, to take account of the Planning Act (NI) 2011, Strategic Planning Policy Statement and Planning Policy Statement 13.

The Planning Act (Northern Ireland) 2011 Part 8 Section 5(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 LDP 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 allocation 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 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.

The draft Plan Strategy 'Technical Supplement 14 Transportation' (August 2018) sets out the evidence base that has informed the relevant policies within the draft Plan Strategy. The Policy Context section lists the following planning policy documents as being relevant to transportation –

1. Regional Development Strategy 2035
2. Ensuring a Sustainable Transport Future: A New Approach to Regional Transportation
3. Strategic Planning Policy Statement
4. PPS 13 Transportation & Land Use
5. PPS 3 Access, Movement & Parking
6. DCAN 15 Vehicular Access
7. Programme for Government
8. Belfast Urban Area Plan 2001

9. Belfast Metropolitan Transport Plan
10. Belfast Metropolitan Area Plan
11. Belfast Agenda
12. Belfast City Centre Regeneration & Investment Strategy
13. Belfast Air Quality Action Plan 2015 – 2020
14. Car Parking Strategy and Action Plan

Appendices A & C summarise The Regional Transportation Strategy (RTS) 2002-2012 and The Regional Strategic Transport Network Transport Plan 2015 (RSTN TP) respectively.

Whilst Technical Supplement 14 refers to the existing policy context and provides commentary on the 'Transportation Profile' under the headings of Highways and Parking, Public Transport, Cycling and Walking, Belfast Transport Hub, Belfast Rapid Transit, Belfast Bicycle Network, Belfast Bikes, York St Interchange, City Centre Ring Southern Section and Car Parking Strategy; there is no new evidence presented specific to the LDP formulation and no reference to a 'Local Transport Study', (required under SPPS and PPS13) or to a survey having been undertaken of the 'transport system and traffic of the district' (required under the Planning Act (NI) 2011).

In relation to the above, we note Technical Supplement 14 Transportation (Page 12, footnotes 5 and 6) reference the 'Travel Survey for Northern Ireland (TSNI) 2014-2016 and Northern Ireland Transport Statistics (NITS) 2015-16. (Statistics from the TSNI are also referenced in Sustainability Appraisal Appendix 5 'Baseline Information for Belfast').

Page 5 of the TSNI states, that is the "only source of information on how, over the region as a whole, people use different forms of transport to meet their travel needs as individuals or family groups....and continues...."Data at Northern Ireland level are robust. When figures are broken down into sub regional level the sample size is reduced. Consequently, data analysis at sub-regional level is limited."

In this context it is questionable whether the use of travel survey statistics compiled at a regional level are sufficiently adequate to inform a survey of the 'transport system and traffic of the district.'

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

- Regional Strategic Network Transport Plan – public consultation in Spring 2019
- Belfast Metropolitan Strategy– public consultation in Autumn 2019
- Belfast Metropolitan Transport Plan – scheduled for consultation 2022

These new plans will supersede the 'Regional Transportation Strategy (RTS) 2002-2012'; the 'Regional Strategic Transport Network Transport Plan 2015 (RSTN TP)' and the 'Belfast Metropolitan Transport Plan' (BMTP) all of which were referred to in the draft Plan Strategy Technical Supplement. The RTS was adopted in July 2002; The RSTN TP was adopted in March 2005; and the BMTP was adopted in November 2004. 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 weakness of relying on these dated Transport Plan plans is acknowledged by Council within the Sustainability Appraisal where the Executive Summary (page 42 paras 7.5 and 7.6) state,

"The influence of other plans, programmes or strategies also restricts our ability to appraise certain effects. As an example, with no up-to-date transport plan for Belfast, the DPS must rely on transport policies from draft BMAP in relation to parking restraint and standards, until such times as further detailed information is available.

As a result, assessment conclusions in some instances will not be based on fact, but on professional judgement, informed by the best available data, together with contributions from statutory consultation bodies and other interested parties. Full details of specific difficulties encountered are set out in the main SA Report."

In the absence in the draft Plan Strategy of a survey of the transport system and traffic of the district and of an up to date transport study, the evidence base relied upon is not robust.

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'.

These matters were brought to the attention of the Council in Translink's response to the Preferred Options Paper dated 14/4/17.

The LDP should 'promote opportunities for improved connectivity and promotion of more sustainable patterns of transport and travel, whilst making land available to facilitate more sustainable patterns of development & travel.'

Under over-arching themes of 'social', 'economic' and 'environmental', the Sustainability Assessment lists 19 no. objectives including to:

"Promote an integrated transport system & encourage sustainable travel" (SA9)

The SA then assesses the environmental effect of each of the objectives. In relation to SA9 it states,

"Facilitating sustainable transport use, managing the road network and parking management through a balanced approach is likely to have significant positive effects, not only on the transport network but also health, wellbeing and air quality."

A further assessment of "Potential Cumulative, Secondary & Synergistic Effects" is undertaken. In relation to SA 9 it states,

On the other hand, the Department for Infrastructure's revised Transport Plan for the Belfast Metropolitan area could have positive synergistic effects in delivering sustainable transport projects, demand management initiatives and behavioural change initiatives. In such a scenario the minor positive effect would be retained overall.

Given that we do not yet know to what extent the Department's plan may affect the plan area and LDP policy, the consolidated score of these cumulative effects remains unknown at this time.

**Q17a. If you consider the Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the Plan Strategy sound.**

**What would make it sound?:**

Preparation of a robust evidence base to include a survey of the transport system and traffic of the district and the preparation of a local transport study which includes a co-ordinated cross Council boundary approach to the provision of Park and Ride facilities.

**Files should be no more than 10MB and in either PDF or Microsoft Word format:**

No file was uploaded

**Q18a. Would you like to highlight another part of the draft Plan Strategy that you consider to be unsound?**

No

## **9. Type of Procedure**

**Q18. Please indicate if you would like your representation to be dealt with by:**

Written representations