

Our ref: JKAC **UNET** DERRY CITY COUNCIL

23 June 2006

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Transportation Unit  
Roads Service  
Department for Regional Development  
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By email & hard copy 23.06.06

Dear Ms O'Neill

### **Draft Sub-Regional Transport Plan 2015**

Further to the publication of the draft Sub-Regional Transport Plan 2015, Roads Service attended a Regional Services Committee meeting in Derry on 17 May 2006. Having fully considered the presentations received at the meeting and the follow up letter from Northern Division dated 9 June 2006, Derry City Council responds as follows.

The Regional Development Strategy (RDS) in setting out the future development of Northern Ireland to 2025 designated Derry as a major regional city. As you will be aware the RDS is supported by a 10-year Regional Transportation Strategy (RTS), the objectives of which will be achieved through detailed programmes of schemes contained within three transport plans,

- The Belfast Metropolitan Transport Plan (BMTP)
- The Regional Strategic Transport Network – Transport Plan (RSTNTP)
- The Sub-Regional Transport Plan (SRTP)

The preparation of a robust and appropriately funded transport plan for Derry is an essential component in ensuring the successful development of the city in future years. To achieve this objective, Derry City Council previously lobbied for a separate transport plan for the city. Despite the demographic details of Derry being more aligned with Belfast, Derry was included in the SRTP as an 'other urban area'.

Derry City Council also requested that elected members be consulted on the emerging SRTP in advance of the publication of the draft, but unfortunately Roads Service advised that this was not possible due to delays in the development of the draft. Following publication, the draft SRTP was presented to elected members at a Regional Services Committee meeting in the Guildhall on 17 May 2006. At the meeting Roads Service advised that the traffic model for the city was still under development and that revised highway proposals would not be available until September 2006.

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Given the total lack of detail in the draft SRTP, Derry City Council is unable to issue a full response at this stage. The comments provided in this response are therefore based on what has been presented in the draft SRTP as published. There is an obvious need for further more detailed consultations with Council.

Unfortunately the concerns previously expressed by Council about the rationale of including Derry City within the SRTP as an 'other urban area' have been realised following the publication of the draft. Derry City Council is very disappointed with the volume and quality of content contained within the draft SRTP which also fails to recognise the strategic importance of Derry to the North West Region and the need to upgrade the cities' cross border links.

The transportation issues that Derry City will face from now until 2015 are not adequately addressed. The absence of proposals to tackle current and future problems and the minimal funding allocated are of major concern. Due consideration of these problems and the preparation of robust solutions is required if Derry's transportation network is to contribute to the future development needs of the city.

### **Levels of Spend within SRTP**

It is recognised that all areas of Northern Ireland will benefit from funding within the RSTNTP and that outside Belfast allocations are envisaged under the headings, Rural Areas and Cross Cutting Measures. The draft SRTP does not however outline how the budgets for the later two areas are to be allocated despite the fact that they contain the majority of funding. Council would like an indication of what allocation this area might reasonably expect to receive under Rural Areas and Cross Cutting Measures and how this compares with current levels of investment.

The proposed SRTP investment for Derry contained within the technical supplement is inadequate and envisages expenditure of approx £13m on walking, cycling and highways or 7.2% of the total available. Derry's population is approx 7% of Northern Ireland and when the Belfast Metropolitan Area is excluded, it is approx 13%. In relation to expenditure under Other Urban Areas, 13% of £179.5m would equate to approx £23m. It would also appear that based on a comparison of populations between the two Regional Cities, that Derry is to receive a much lower percentage of the RTS total.

The proposed SRTP investment for highways suggests significant discrepancy in the allocation for Derry, given its population compared to many other settlements. A total investment of £6.98m in Derry will not address the problems in the city and does not compare favourably against many other settlements with populations that are a fraction of Derry's. This is of particular concern given that the Review of Housing Growth Indicators suggests that Derry will have one of the highest rates (42%) of housing growth up to 2015. In addition, the traffic volumes in Derry are much higher than in any of the Other Urban Areas.

Roads Service issued a subsequent letter that attempted to address the concerns expressed by elected members at the meeting on 17 May 2006. The letter questions the validity of comparing the funded allocated to Derry against other urban areas. Council are at a loss to understand the rationale expressed in this letter given the stated facts contained within the various technical supplements of the draft SRTP.

In relation to financial allocations for walking and cycling the RTS allocates a total spend of £38.9m for walking and cycling provision across Northern Ireland. Of this £27.0 million (30%) is for walking and £11.9 million (70%) for cycling.

The draft SRTP allocates a total spend of £6.3 million for walking and cycling in Derry. Of this £6.1 million (97%) is allocated for walking and only £0.23 million is allocated for cycling (3%). While the total allocation is in line with the expected levels of funding the proportional split between walking and cycling is completely unsatisfactory. These levels need to be revised to reflect the 70/30% split as envisaged within the RTS. The proposed methodology and allocation for the Rural Area needs to be explained in detail to demonstrate what funding is being targeted for the Derry City Council area.

The draft SRTP states that the Investment Strategy for Northern Ireland envisages an additional allocation of £40m over RTS levels of spend, split between walking, cycling and highways. No information is given in the draft or in subsequent correspondence from Roads Service as to much of this money is being targeted to the Derry City Council area. Council would like to see a clear breakdown of the allocation of the additional £40m across all council areas.

## **Highways**

It is essential that the road network in the city is capable of sustaining economic growth within the north west region in the years ahead. Council understands that the capacity of the road network in Derry is being tested using a traffic model that is still under development. As the draft SRTP covers the period up to 2015, it is imperative that the model outputs provide sufficient confidence that the road network will operate efficiently over the next ten years and beyond.

Derry City Council is concerned that the network in the city will be inadequate to cope with continued traffic growth over the SRTP period. The extent of congestion in the city over the next ten years has not been quantified and the allocation of £6.98m to address as yet unknown problems would appear premature and derisory.

The draft SRTP is devoid of proposals to address congestion within the central area and the city walls. Recent information received from Roads Service regarding options that were considered is totally inadequate. The detailed examination of traffic movements within the city centre and the identification of a range of possible solutions are required and should be discussed properly with Council as opposed to being dismissed.

The interaction between the A6 and A5 route studies, their effect on traffic movements in and around the city and the linkage with cross border routes is very important and needs to be clearly explained. The proposals contained within the Derry Area Plan for the widening of Queen's Quay need to be reflected in the transport blueprint. It is likely that Derry will require additional strategic links to prevent the city from suffocating as a result of traffic congestion. Adequate proposals need to be brought forward within the Transport Blueprint and appropriate financial allocations made available.

## **Walking & Cycling**

The Derry Cycling Forum was established in 2000 with the strategic objective of developing a comprehensive network of routes across the city catering for cyclist, walkers and people with disabilities. The Forum is committed to the delivery of a high quality network of routes across the city in support of the DRD Cycling Strategy and DRD Walking Action Plan, documents that are not referred to within the draft SRTP.

To assist in the achievement of the Forum's objectives a cycling strategy was prepared in 1998. The strategy has been regularly updated and is accompanied by a City Master Plan that identifies existing, proposed and desirable routes. Council are very disappointed that the

content of the both documents are not reflected in the draft SRTP, particularly given that the consultants were issue with a copy of the Master Plan.

The draft SRTP appears to propose only two schemes for Derry during the plan period one of which will be developer led. This paltry investment is inadequate in the development of the network as identified in the Master Plan, and will fall well short of the projected need.

The Ilex Regeneration Plan supported by the Derry Area Plan 2011 and DSD Heart of the City supports the need to develop a cross-river link over the Foyle. Specifically, the revised SRTP should reflect the need to develop a cycle/pedestrian bridge across the Foyle. The primary walking route shown on the blueprint should extend to the University, Northland Road and Limavady Road areas of the city.

## **Bus & Rail**

Derry City Council are currently in discussions with Ilex and Translink regarding the future location of the railway station and how it could link to a future foot/cycle bridge across the river. Investment in these sustainable modes of travel needs to be adequately reflected and budgeted for within the SRTP.

The draft SRTP suggests that twelve bus stations in the Other Urban Areas should be refurbished. Of the twenty-nine other urban areas Derry has the highest percentage of people using public transport to get to work, yet for some reason refurbishment of the local bus station is excluded. The intended location of additional car parking adjacent to the bus station needs to be clearly stated with the SRTP.

There is also no reference to the upgrading of the cities' railway station. However, Council have been advised that this is still under consideration and wish to be informed at the earliest possible opportunity of the outcome of these deliberations with appropriate assurances regarding the funding of any refurbishment.

## **Car Parking**

It is widely recognised by those who live, visit and work in Derry that there is a shortage of convenient car parking spaces in the city. Derry requires more appropriately located car parking spaces in general and in the Bishop Street and William Street areas of the city in particular. Adequate, convenient, parking provision needs to be made within the city for blue badge holders.

The draft SRTP suggests that only 60% of available spaces in Derry are occupied. This claim is in total contrast to the actual situation on the ground where city centre streets are saturated with parked cars. All day parking also swamps many residential areas in close proximity to the city centre. In addition there are significant numbers of vehicles parking in contravention of waiting restrictions in the city centre. It is understood that following the introduction of Decriminalised Parking Enforcement that there will be increased levels of enforcement and greater compliance. The displacement of these vehicles to neighbouring streets needs to be properly considered.

The development of a robust car parking strategy is an essential component of the transport planning process. The comments within the draft SRTP in relation to car parking within Derry are totally inadequate. Council has not been consulted to date on the content of the car parking strategy and is keen to know what is being proposed and what level of investment is envisaged.

## **Park and Ride**

The technical supplement for Derry contained within the draft SRTP advocates a bus-based Park and Ride scheme for the city, but no information is provided on the intended location/s on the transport blueprint. Subsequent correspondence from Roads Service has advised that the potential for Park and Ride will be considered following further studies. As suitable proposals will not be identified until later, Council is very concerned that insufficient time will be available for consultation prior to the publication of the SRTP. Bus based Park and Ride is viewed by Derry City Council as an important competent in developing the future transportation infrastructure for the city. Funding needs to be made available within the SRTP to facilitate this initiative.

## **Air Quality**

In 2005 Derry City Council declared an Air Quality Management Area under the Environment (NI) Order 2002 for part of Creggan Road at its junction with Creggan Street and Marlborough Terrace due to the exceedence of the annual mean limit of  $40\mu\text{g}\text{m}^{-3}$  for Nitrogen Dioxide. Monitoring at other locations within the City indicates that the Council is likely to declare further Air Quality Management Areas for Nitrogen Dioxide exceedences around the following road junctions: -

- Buncrana Road at its junction with Racecourse Road
- Dales Corner (junction of Limavady Road/Glendermott Road).

As part of the above legislation the Council is required to produce an Air Quality Action Plan that seeks to ensure that steps are taken to reduce pollutant levels within Air Quality Management Areas to below objective levels. It is important that the SRTP acknowledges that poor air quality associated with high volumes of traffic and congestion is a problem within the Derry City Council area. The Air Quality Management Area at Creggan Road should also be highlighted.

It is important that the plan reflects Road Service role as an active partner in the action planning process that is being progressed by Council. The SRTP should also outline the actions that shall be taken by Roads Service to ensure that, within the Derry City Council area, 2010 air quality objectives limits are achieved and are upheld up to 2015.

In conclusion, Derry City Council wishes to reiterate its disappointment with the published draft SRTP. It is clear that a significant work is required in the months ahead to develop a transport blueprint that will adequately address current problems and meet the needs for the city in the coming years. The absence of such proposals and the minimal funding allocated are of major concern.

After many months of survey work and traffic modelling the absence of a validated traffic model coupled with robust solutions to address the major problems that Derry will face in the near future is very worrying. It is essential that the traffic model shows that the cities' road network will still be operating within capacity at the end of the plan period. The allocation of monies for highway improvement schemes in the city, that have yet to be defined is fundamentally flawed.

Should additional strategic links be required to relieve congestion then they need to be included in the SRTP or if considered more appropriate, the RSTNTP. The financial allocations envisaged for Derry are at odds with its position as a major regional capital and compare unfavourably against Belfast and many other much smaller settlements.

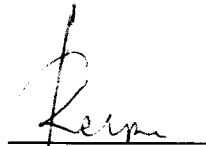
The draft SRTP totally fails to address the need for continuing investment in the cycle network in the council area. The content of the Derry Cycling Strategy and the routes

identified within it's Master Plan need to be included and properly funding, the current financial split between walking and cycling is totally at odds with the RTS.

Roads Service will be aware from comments made at the meeting on 17 May 2006 that elected members are very concerned that the views of Council and other local stakeholders, will not be given due consideration in the development of the SRTP. An assurance regarding the publication of a consultation report does little to allay these concerns.

I look forward to receiving a fully detailed response to the issues raised in this letter and to further consultation with Derry City Council when proposals for the city are fully developed.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Kelpie', written over a horizontal line.

**John Kelpie**  
**City Engineer**