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22<sup>nd</sup> June 2006

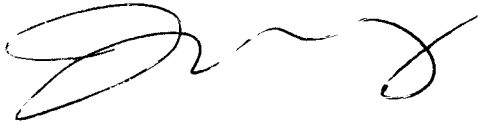
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Sub-Regional Transport Plan Team  
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Dear Geraldine

Please see attached comments from the Londonderry Chamber of Commerce on the Draft Sub-Regional Transport Plan 2015.

Please do not hesitate to contact me if you require any additional information.

Yours sincerely



Janice Tracey  
Chief Executive

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## **RESPONSE FROM LONDONDERRY CHAMBER OF COMMERCE TO: DRAFT SUB-REGIONAL TRANSPORT PLAN 2015**

The Londonderry Chamber of Commerce welcomes the opportunity to comment on the Department for Regional Development's Draft Sub-Regional Transport Plan, 2015.

The Chamber wishes to acknowledge at the outset the considerable hard work, effort and attention to detail put in by officials in the Department for Regional Development to produce a transport plan for 29 cities and towns within Northern Ireland varying in size from populations of 5,000 to almost 91,000.

The Chamber however has a number of fundamental criticisms of this draft sub-regional transport plan. Much of this criticism is directed at those responsible for strategic policy decisions and for determining the constraints and frameworks within this sub-regional plan was to be drawn up. However it must be noted that while the draft SRTP contains a certain amount of information for all areas, the technical supplement for Derry is inadequate and lacking in detail.

We are informed that the draft plan was prepared taking account, inter alia, of the Regional Development Strategy and the Regional Transportation Strategy.

Firstly the Regional Development Strategy identifies Londonderry as a Regional City Gateway and transportation hub for the North-West. Chapter 5 of the RDS states:-"In addition to the Regional City Gateways of Belfast and Londonderry and the Gateway town and seaport of Larne the Strategy identifies two other centres, Newry and Enniskillen which have a major inter-regional Gateway role." The draft sub-regional transport plan does not acknowledge this hierarchy which has important transportation implications. For example on page 15 paragraph 1.1.5 the draft plan states: "These towns and cities (all 29 of them!) were designated by the Regional Development Strategy as main hubs or local hubs." Page 97 of the Technical Appendices describes the Settlement Status of Londonderry as "City of the North West and Major Inter-Regional Gateway." The Chamber wishes these inaccuracies to be addressed in the final version of the plan to show that there are only two Regional City Gateways designated in the Regional Development Strategy and these two Gateways are Belfast and Londonderry. In the Chamber's view this has important implications for future transportation policies in the North West and is not simply an attempt to juggle with semantics.

Amongst the strategic transport objectives identified in the Regional Development Strategy for Londonderry and the North West sub-region are:

- ❖ upgrade strategic transport links to the rest of the Region and cross-border; intensify the use of the Port and Airport.
- ❖ strengthen the position of Londonderry as the transport hub of the North West by:-
  - enhancing transport linkages to the Regional Strategic Transport Network and to towns in Donegal
  - examining the potential for improving transport links to and from the Port of Lisahally, the industrial areas at Maydown and Campsie and the City of Derry Airport
  - providing better accessibility to the central areas of the City, particularly on the main radial routes for public transport, walking and cycling
  - improving opportunities for interchange between bus and rail, particularly linked to bus priority, park and ride facilities and associated traffic management in the central area and pedestrian connections between the bus and rail stations.

The Regional Transportation Strategy for Northern Ireland 2002-2012 stated on page 117 that this draft plan would fully recognise the urban needs of Londonderry as the Regional City for the North-West.

In the Chamber's view the current draft plan has almost totally failed to do this. There is no recognition in the plan of the cross-border and sub-regional dimensions of transport issues in the City. There is no recognition of the need to further develop our Port and Airport. There is no mention of rail services or their importance to the future connectivity of the North West to the rest of the region.

In essence this is not a cohesive or coherent plan in any sense of those words. It is merely a collection of 29 separate potential investment proposals over a 9 year period across the 3 common themes of walking, cycling and highways.

In response to the draft Regional Transportation Strategy this Chamber called for a separate North West Transportation study embracing the North

West sub-region of Londonderry, Strabane, Limavady and Donegal and taking into account all aspects of transportation in the North West.

We believe that this draft sub-regional plan falls far short of what is required and fails to address the fundamental transportation issues facing us over the next decade. In the Chamber's view it was a flawed concept in the first place to believe that it would be feasible to produce any sort of realistic sub-regional plan for 29 towns together with the whole of Rural Northern Ireland based on the universally applied themes of walking, cycling and highways.

One other issue which concerns the Chamber is how or whether this plan will actually be implemented. We are on the verge of significant administrative reforms in Northern Ireland arising from the Review of Public Administration under which new enhanced Local Authorities will take on responsibilities for Roads maintenance but other strategic transport issues will remain with Central Government.

How does the Department envisage implementation of the measures contained in the sub-regional plan over the next 10 years or so? We believe that this issue should be addressed and spelt out in some detail in the final version of the sub-regional plan.

Turning now to the details contained in the Technical Supplement the Chamber notes that proposed investment in the City is estimated at £13,275,000 over the plan period. Out of this total it is proposed to spend £6,980,000 on highway measures.

However, there is no clarity on which schemes will benefit from this proposed investment. We are told-"the Blueprint does not identify the full extent of highways and traffic management proposals for Derry over the period 2005-15 in line with the extrapolated RTS spending levels, enhanced by funding from the Investment Strategy for Northern Ireland. However, as an interim measure, outline spending proposals, in line with these spending levels have been quantified for further, as yet, unidentified schemes."

"Our aim will be to prepare a full set of highway, traffic management and public transport proposals, in line with the identified spending levels and following appropriate consultation, publish these in the Final Sub Regional Transport Plan."

The Chamber views this inability to identify what over half the £13 million budget will be spent on as wholly unacceptable. We have waited almost 5 years to see this sub-regional plan, then to be told that further information will be published and that there will need to be further consultation before the final document can be signed off.

The Chamber is not convinced either that the reasons given for this inability to allocate the budget are wholly valid. The infrastructure studies cited for the A6 and A5 Victoria Road may well fall outside the plan period and thus have little relevance to this particular sub-regional study.

The overall budget for the A6 scheme has been cited as around £250 million and to date there is no certainty how or where that money can be found. So why propose this as a reason for not being able to allocate the highways budget for the City.

One of the other reasons listed to justify the Department's inability to allocate this budget is the review of the Pedestrian Zone in the City. Money for the pedestrian zone budget will be a call on DSD funds and not DRD monies. The proposal is already contained in the DSD Business Plan for 2006-07. Why is this listed as reason for not allocating your Department's budget?

Finally, proposals for the development of Ebrington and Fort George are unlikely to affect traffic issues in the City in the short to medium term and again the Chamber does not see these issues as validating your decision not to allocate the budget. The reasons you have given seem more contrived than real and this Chamber would welcome an opportunity to discuss with officials the specific highway measures which will benefit from this proposed investment of £6 million to determine how the impediments referred to can be resolved in the short term.

The Chamber was disappointed that out of £13 million only £228,000 will be spent on cycling and that out of this budget no monies are being allocated to provide traffic free cycling routes. All new proposals appear to be for on road cycling provision. It is not clear from the sub-regional plan the extent to which these proposals are in line with the City's overarching cycling strategy. The Chamber would welcome clarification on this issue.

In conclusion the Chamber has been disappointed by this draft sub-regional transport plan. We believe the concept of producing the plan in this format is flawed and contrived. The relevance of the Regional Development Strategy and the Regional Transportation Strategy to the needs of the North West have been misinterpreted and the undertaking given in the RTS that the sub-regional plan would fully take into account the traffic needs of the North West has not been honoured.

Whilst we welcome proposed investment of £13 million in the City we are astounded that you cannot yet allocate the Highways budget which accounts for over half the total. How therefore has the amount been decided?

We do not accept the reasons you have given as being fully valid. We feel that cycling is not obtaining its fair share and that the easier option of making provision on existing roads has been adopted rather than the construction of dedicated traffic free cycle routes. In addition, the refurbishment of bus and rail stations should be included. In relation to Derry, the comments on car parking are totally at odds with the reality in the city where more convenient parking is needed especially in the Bishop St area.

Finally, we note the silence in the document about implementation of the proposed projects in the post Local Government re-organisation period and we urge the Department to address this in the final version of the plan.

The Chamber hopes that the comments above will be carefully considered by the Department for Regional Development and that it will reflect seriously on the format, relevance and need for such a generalised "one size fits all plan." A plan of this nature linking villages of 5000 people together with towns and cities of up to 91,000 by means of three common themes is at variance with the principles and philosophy of spatial planning as set out in the Northern Ireland Regional Development Strategy.

When one considers the plans, both land use and transportation which have been produced for the Belfast Metropolitan Area together with the current and future levels of planned investment for the BMA and the Eastern Seaboard Corridor then it only serves to bolster the perception that Northern Ireland consists of Belfast and the rest. It is clear that the investment envisaged for Derry is at odds with its status as a regional capital and compares unfavourably with Belfast and many other much smaller urban areas.

In relation to the Investment Strategy for NI, there is an additional £40m of ISNI money available, clarification is required on how much is coming to Derry.

There is little evidence from Central Government that investment patterns in Northern Ireland are consistent with or in any way influenced by the gateways, hubs and corridor strategy contained in the RDS. References in strategy documents to Regional City Gateways and their potential for de-centralised economic development will consist only of empty words as long as their transportation needs are catered for in the manner adopted by this sub-regional transport plan.