



Fermanagh & Omagh  
District Council  
Comhairle Ceantair  
Fhear Manach agus na hÓmaí

## Fermanagh & Omagh Draft Plan Strategy Representations Form

Hard Copies of the Draft Plan Strategy are available for inspection during normal opening hours at the council's principal offices. The documents, electronic copies of this form, and our 'Guidance for Making Responses to the Plan Strategy' may be viewed at: <https://www.fermanaghomagh.com/>

### How to respond

You can make representations about the Draft Plan Strategy by completing this survey form, or if you prefer, you can fill out this form online.

For further assistance contact: [developmentplan@fermanaghomagh.com](mailto:developmentplan@fermanaghomagh.com) or Tel: 0300 303 1777; All representations must be received by 21st December 2018 at 12:00 noon.

### SECTION 1. Contact Details

Individual ☐ Organisation ☒ Agent ☐ (complete with your client's details first)

**First Name**

Robin

**Last Name**

Totten

**Job Title** (Where relevant)

Acting Head of Business Change and Strategic Planning

**Organisation** (Where relevant)

Translink

**Address**

Lanyon Place Station

East Bridge Street

Belfast

**Postcode**

BT1 3PB

**Telephone Number**

02890277899

**Email Address**

[REDACTED]

**If you are an Agent, acting on behalf of an Individual or Organisation, please provide your contact details below.** (Please note you will be the main contact for future correspondence).

**First Name**

**Last Name**

**Job Title** (Where relevant)

**Organisation** (Where relevant)

**Address**

<input type="text"/>
<input type="text"/>
<input type="text"/>

**Postcode**

**Telephone Number**

**Email Address**

## SECTION 2. Representation

What is your view on the Draft Plan Strategy?

**Sound** ☐

If you consider the Draft Plan Strategy to be **sound**, and wish to support the Plan Strategy, please set out your comments below.

*(Continue on a separate sheet if necessary)*

**OR**

**Unsound** ☒

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

Soundness Test No:

- ☐ **P1 Has the Draft Plan Strategy been prepared in accordance with the council's timetable and the Statement of Community Involvement?**

- ☐ **P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?**
- ☐ **P3 Has the Draft Plan Strategy been subject to sustainability appraisal including Strategic Environmental Assessment?**
- ☐ **P4 Did the council comply with the regulations on the form and content of its Draft Plan Strategy and procedure for preparing the Draft Plan Strategy?**
- ☐ **C1 Did the council take account of the Regional Development Strategy?**
- ☐ **C2 Did the council take account of its Community Plan?**
- ☒ **C3 Did the council take account of policy and guidance issued by the Department?**
- ☐ **C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?**
- ☐ **CE1 Does the Plan Strategy sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the Draft Plan Strategies of neighbouring councils?**
- ☒ **CE2 Are the strategy, policies and allocations realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base?**
- ☒ **CE3 Are there clear mechanisms for implementation and monitoring?**
- ☐ **CE4 Is it reasonably flexible to enable it to deal with changing circumstances?**

**Plan Component** - To which part of the Draft Plan Strategy does your representation relate?

**(i) Relevant Paragraph**

**(ii) Relevant Policy**

HOU01, HOU02, HOU05,  
HOU17, IB01, IB04, TR01,  
TR02, TR04

**(iii) Proposals Map**

**(iv) Other**

## Details

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 refer to attached sheets under Appendix 1.

*(Continue on a separate sheet if necessary)*

## Modifications

What, if any, modifications do you think should be made to the section, policy or proposal? What specific modifications do you think should be made in order to address your representation?

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

Ensure that important sustainable transport principles currently existing in PPS13 are included in new transport policies.

*(Continue on a separate sheet if necessary)*

If you are seeking a change to the Draft Plan Strategy, please indicate how you would like your representation to be dealt with at Independent Examination:

☒ **Written Representations**      ☐ **Oral Hearing**

### SECTION 3. Data Protection and Consent

#### Data Protection

In accordance with the Data Protection Act 2018, Fermanagh and Omagh District Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of Plan Preparation and will not be shared with any third party unless law or regulation compels such a disclosure. It should be noted that in accordance with Regulation 17 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the council must make a copy of any representation available for inspection. The Council is also required to submit the representations to the Department for Infrastructure and they will then be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the Privacy section at [www.fermanaghomagh.com/your-council/privacy-statement/](http://www.fermanaghomagh.com/your-council/privacy-statement/)

**By proceeding and submitting this representation you confirm that you have read and understand the privacy notice above and give your consent for Fermanagh and Omagh Council to hold your personal data for the purposes outlined.**

#### Consent to Public Response

Under planning legislation we are required to publish responses received in response to the Plan Strategy. On this page we ask for your consent to do so, and you may opt to have your response published anonymously should you wish.

Please note: Even if you opt for your details to be published anonymously, we will still have a legal duty to share your contact details with the Department for Infrastructure and the Independent Examiner/Authority they appoint to oversee the examination in public into the soundness of the plan. This will be done in accordance with the privacy statement above.

- ☒ **Yes with my name and/or organisation**
- ☐ **Yes, but without my identifying information**

#### Signature

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#### Date

19 - 12 - 18.
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## Appendix 1

There is a requirement for the LDP Plan Strategy to include a robust evidence base, specifically in relation to Transportation.

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

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

*(2) Those matters include—*

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

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

*(c) the size, composition and distribution of the population of the district;*

***(d) the communications, transport system and traffic of the district;***

*(e) any other considerations which may be expected to affect those matters;*

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

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

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

There is no references and the Council has not appear to have undertaken an up to date survey or assessment of the transport needs in the plan area. Instead it seems to rely largely on out of date information collated for the development of transport plans almost 20 years ago.

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

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

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

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

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

The draft Plan Strategy sets out the following aspirations in terms of sustainable travel:

***5.7. The Council area will be a welcoming place with a diverse and prosperous culture with improved access to healthy lifestyle choices, good education and lifelong learning facilities. It will be a better connected place by road and through digital communications. Improvements to transport infrastructure will have taken place to widen transport choices and help reduce car dependency, improving accessibility and connectivity both within and beyond the Council area.***

***6.30. Our settlements, and in particular our main towns, offer the greatest opportunity to improving accessibility by public transport and active travel modes and thereby reducing car dependency.***

***6.32. To further sustainable development, the plan Strategy's approach to transportation is to:***

- optimise opportunities for integrating land uses with transportation;***
- offer greater choice of alternative transport modes to the private car;***
- improve connectivity and road safety; reduce travel times and***
- improve public transport services between our main centres and elsewhere in the region;***
- reduce congestion and improve access in our towns by sustainable modes; and***
- improve access in rural areas to essential services by viable and sustainable public transport services to reduce social exclusion.***

Whilst we would support these aspirations in the draft Plan Strategy, there is no tangible indication through the policies therein, to suggest how these aspirations will be met. The primary focus of the transport policies within the draft Plan Strategy appears to be on providing and protecting car parking facilities, particularly in town centres. This is despite the congestion and accessibility issues caused by attracting cars to park in the town centres and the fact that, as acknowledged in the carparking strategy document prepared for the Council by Aecom (March 2018), both Fermanagh and Omagh town centres and immediately surrounding areas are highly accessible by public transport i.e. within ten or twenty minutes journey time.

The strategy document also found *'that the majority of Council owned car parks are located within the areas identified as accessible by public transport and walking. Therefore the opportunity exists for those who live in these highly accessible areas to change their travel behaviour and travel by alternative modes rather than a private vehicle'*.

Whilst Park and Ride / Park and Share facilities have an important role to play in promoting sustainable transport, the proposed monitoring of the number of new or extended park and ride/park and share facilities created, as an indicator to assess whether transportation policy is sufficiently enabling development, is inadequate and takes no account of usage of the sites or the impact on modal share.