

**COUNCIL FOR NATURE CONSERVATION
AND THE COUNTRYSIDE**
An Advisory Council to the Department of the Environment

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LBH/cons/few/0606

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Dear Sir

DRAFT SUB REGIONAL TRANSPORT PLAN 2015

Thank you for the opportunity to comment on the above consultation paper.

Council welcomed the roll out of the regional transport strategy into the Regional strategic transport network transport plan in 2003 and the Belfast metropolitan transport plan in 2004 and now the final one of sub regional transport plan.

The RTS aimed to support the RDS by providing the means to achieve 'a vision of a modern sustainable safe transport system which benefits society the economy and the environment and which actively contributes to social inclusion and everyone's quality of life'.

CNCC has argued in previous correspondence that the sustainability of transport is dependant on many cross cutting policies We would suggest that in order for the strategy to conform to aims and objectives of the RDS and RTS that there should be an acknowledgement that the plan is sustainable and does not adversely affect biodiversity and should mitigate against climate change impacts allowing for both adaptation and mitigation. It is to be noted from the environment report that biodiversity, countryside, water environment to name a few are either reported as negative or at best a neutral (in that although the effect is negative it is not seen as significant) and consequentially there is an apparent cumulative negative impact on the environment. However by changing practices within some areas of the plan such adverse effects could be neutralised, Introduction of softer measures to encourage behavioural change from private car or excessive travel can have a greater positive impact on the environment, introduction of wildlife corridors and maintenance and management regimes that encourage biodiversity would be welcome, assessment of


carbon budgets for the plans and actions to reduce carbon emissions and also the impact on health and targeting social need could be catered for.

CNCC is concerned that much of the plan is centred on infrastructure and not modal shift to more sustainable means of travel or reducing the need to travel. The plan should also recognise the likelihood of changing delivery mechanisms with respect to the outcomes of the review of public administration.

We have appended in greater detail some areas of concern.

CNCC would welcome further discussion on these topics.

Yours sincerely

A handwritten signature in black ink that reads "Lucinda Blakiston Houston". The signature is written in a cursive, flowing style.

**DR LUCINDA BLAKISTON HOUSTON
CHAIRMAN**

COUNCIL FOR NATURE CONSERVATION & THE COUNTRYSIDE

COMMENTS ON CONSULTATION ON THE SUB REGIONAL TRANSPORT PLAN 2015

WALK CYCLE

The walk/cycle measures should encourage shared use for all modes of active travel where possible. We would agree that facilities for cycles should be targeted where most needed but we would also encourage the implementation of softer measures to promote modal shift and the use of integrated journeys. The RTS called for safe and extensive walking and cycling networks which can be used for travel to work, shops education centres and leisure. Access to the countryside and heritage areas is important and would support other strategies through sustainable development and biodiversity through communication and education.

HIGHWAY MEASURES

In order for the plan to encourage more sustainable modes of travel:

Bottle necks should always give priority to public transport and where possible walk/cycle space so there is a continuous encouragement for people to shift from private car to public transport.

DEVELOPMENTS

All new developments should have a mandatory duty to mitigate for climate change and encourage more active travel or integrated travel modes to services

PARKING

Park and ride schemes should also offer sustainable access

PUBLIC TRANSPORT

All access to public transport should encourage integrated journey modes through safe routes to stations or ease of access to strategic routes as endorsed in the RSTNT.

RURAL INFRASTRUCTURE

The potential for tourism to become a significant economic asset to the rural communities is huge and transport infrastructure should recognise what the rural tourist is seeking. Over 60% of tourists to Scotland visit for its scenery and countryside; planning and transport strategies must recognise the importance of the natural assets and address the cumulative degradation that can reduce such capital.

Addressing inadequate levels of investment should look not only at maintenance but also speed control and the use of the natural habitat to impose speed restrictions, On many lesser roads, priority given to walking and cycling would provide for extensive walking and cycling networks at minimal costs but with accepted speed controls with little impact on the natural environment.

The private car is a significant contributor to climate change and yet is essential for the rural way of life unless there are specific measures introduced to tackle private car dependency. We endorse the support for rural transport initiatives and would encourage the support for rural transport plans for business. We believe that a more in depth response to rural transport is needed.

Route maintenance taking into account the previous paragraph should embrace both biodiversity and landscape needs. Bridge strengthening and street lighting should be strategically assessed as both programmes could have significant cumulative effect on the natural environment without addressing social need.