

31

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Dear Ms O'Neill,

Draft Sub-Regional Transport Plan 2015

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 44 Full Members represent over 82,000 individuals, 265 subsidiary groups, have an annual turnover of over £38 million and manage over 230,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment.

These comments are agreed by Members, but some members may also be providing independent comments as well.

1. Welcome for the Draft Plan

We welcome the publication of this Draft Plan and the opportunity to make comments. It is important that the Department commits to involving stakeholders in a participative and interactive consultation process.

2. Relative Expenditure by Transport Mode

It is noted (p.1) that the costs of the packages presented in the Sub-Regional Transport Plan (SRTP) are constrained by the relevant indicative expenditure, by mode of transport, given in the Regional Transportation Strategy (RTS) and enhanced by the Investment Strategy for Northern Ireland. However, neither of these documents underwent a Strategic Environmental Assessment (SEA) to ensure that environmental impacts were considered in a robust manner. SEAs were conducted on the SRTP and recently produced Area Plans but they cannot influence the relevant indicative expenditure on transport modes. Given the importance of the indicative expenditure figures it should become a priority to conduct a SEA on, in particular, the RTS. The Parliamentary Office of Science and Technology warns that SEA is often conducted too late, and it recommends that RTS should have an SEA conducted. The review of the RTS, which must include a SEA, should be brought forward from 2008, with key recommendations then adopted in the subordinate transport plans.

NIEL believes that the indicative expenditure figures need to be revised if we are to move away from a transport system which is dominated by the car and if we are to meet the Government targets outlined below. At the moment highway measures are to receive 77% of the SRTP budget. Although highway improvements can have positive effects on the other transport modes and the environmental impact of road transport in particular areas (improving local air quality at traffic bottlenecks) they also have the effect of reinforcing Northern Ireland's reliance on the car and truck. It is generally accepted that the construction of new roads generates more traffic, therefore the emphasis for roads should be efficiency rather than capacity. Only by increasing the share of the budget for other transport modes will significant strides be taken towards ending this reliance.

3. Government Targets

In two major policy documents, *First Steps Towards Sustainability* and *Shaping Our Future*, the Government has made a number of commitments, including to:

- reduce CO₂ emissions by 30% below 1990 levels by 2025
- reduce the emissions from transport
- reduce the reliance on the private car
- change the regional travel culture and contribute to healthier lifestyles
- extend travel choice for all sections of the community by enhancing public transport
- achieve a modal shift in terms of how civil service staff travel to and from work.

Transport accounted for around 27% of the CO₂ emissions in 2003, therefore if the 30% reduction target is to be achieved it seems reasonable to assume transport emissions will have to be reduced. However, the environmental appraisal of the draft SRTP predicts that the effect on greenhouse gas (GHG) emissions will be neutral as these emissions are proportional to private vehicle kilometres travelled. It supposes that any gains in fuel efficiency, 'green' technology and traffic flow are only likely to offset the 2% annual rise in traffic volumes predicted in the RTS. This indicates that the plan does not adequately address the need to encourage the modal shift which will be necessary if we are to achieve the emissions targets.

4. Facilitating a 'Modal Shift'

The draft SRTP suggests that the position of the car as main transport mode within Northern Ireland society will be further reinforced. A modal shift away from car dependence can only be achieved by addressing years of under investment in public transport and by making alternative transport more attractive than the car. This shift can not be brought about by transport policy in isolation - land use planning has a particularly important role to play - but the SRTP could certainly do more. Some useful targets are:

- Relative expenditure on private and public transport modes should be reversed to favour public transport.
- Fast, frequent and reliable public transport should be available to all
- Towns should have bus services which run 7 days a week for over 12 hours a day, with popular routes operating at a more than hourly frequency.
- Rural settlements should have increased service levels: small towns should have hourly services, villages and intermediate settlements should have five return journeys per day and smaller settlements should have at least two return journeys per day.
- Buses and other forms of public transport should be given priority in congested areas of towns and cities.
- Parking availability should be reduced in town centres, with park and ride schemes provided from the town limits.
- Cycle lanes should be provided from town limits to town centres.
- The main shopping areas in towns should be pedestrianised, with the exception of limited town service buses and mobility vehicles.
- Safe walking and cycling routes should be provided to all schools.
- Consideration should be given to innovative measures which would discourage children being dropped at the school gate by private vehicles- for example car exclusion zones, walk to school clubs, etc
- Railway stations and regional bus centres should provide park and ride facilities at an attractive price.

In addition, more must be done to encourage individuals to leave their car behind, to use public transport and to walk or cycle, especially for shorter journeys. The Department should engage with partners to prepare promotional information/activities that highlight the environmental and health benefits of such behavioural change. Additional services, such as TravelSmart¹ and subsidised car clubs, should be promoted and funded by Government. The proposed expenditure of £0.2 million for promoting sustainable modes of transport in Other Urban Areas and Rural Areas is wholly inadequate amount for what should be a key objective of the SRTP.

Land use planning plays a particularly important role in shaping individual's behaviour with regard to travel and transport. It is, therefore, imperative that a coordinated approach be taken when considering land use and transport. The full implementation of PPS 14 should help to increase the sustainability of public transport in more rural areas; by concentrating future development in established settlements planners will provide a more concentrated customer base for public transport operators. Public transport links should be incorporated into new developments, with new bus stops and services provided in growing villages and towns in a proactive and innovative manner.

Community Planning may also help to create a more sustainable transport system by allowing those most likely to use services more of a say in how these services are delivered; for example where should *Park and Rides* be established and how often services are required.

5. Desired Outcomes

The targets set in the SRTP are very much based on infrastructure and service delivery. This reflects the problem of under-investment in public transport and the continued dominance of the car. However, it is now time to set targets for, and to start tracking, the behavioural outcomes of our policies and investments. The desired outcome of the SRTP and the associated increased investment in public transport should be a reduction in the number of car journeys made, the number of private vehicle kilometres travelled, the total CO₂ emissions from transport and the number of instances of poor local air quality. At the same time targets should be set to increase the numbers of journeys made by public transport, percentage of the population using public transport to travel to work and the percentage of the population walking or cycling to work.

We thank you for the opportunity to make these comments. We hope that you find them helpful and that they will be incorporated in the final Plan. If you would like to discuss them further please do contact us.

Yours sincerely



Prof Sue Christie
Director

¹ TravelSmart is a joint project between Sustrans and Socialdata. It employs Individualised Travel Marketing programmes to use personal dialogue with households, offering tailor-made information and support which allows people to walk, cycle and use public transport more often.