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Axe 22/6/06
Wendy

Mr Stephen Woods
Sub-Regional Transport Plan Team
Transport Unit
Road Service
Department for Regional Development
Room 3-29, Clarence Court
10-18 Adelaide Street
Belfast
BT2 8GB

Dear Mr Woods,

Re: ICE NI Response to the Draft Sub-Regional Transport Plan 2015 (SRTP)

The Institution of Civil Engineers (ICE) is a learned society with some 75 000 members, across UK, Europe and the World. It is a qualifying body and sets standards; it facilitates "best practice" and acts as public voice for the profession of civil engineering. It is not a trade organisation, so it has no commercial axe to grind, but has a key professional role in representing a broad church of members, drawn from government, consulting engineers, contractors, both at home and overseas. This makes ICE a source of unbiased advice for government and others.

ICE is the oldest professional engineering institution in the world. Its members are responsible for the design, project management and construction of everything we see around us in the built environment. The Institution is administered from its headquarters in London, and has a strong regional base, with ICE Northern Ireland (ICE NI) based in Belfast, representing over 1800 members.

ICE NI would firstly like to congratulate the Department for Regional Development on this valuable, ground-breaking and challenging consultation document and wish to make the following comments:

1. The Institution welcomes the publication of the Draft and believes it is an important step in the need for continuous development of the Spatial Plan for the Region and in particular a sustainable transport strategy.

2. We believe that a major objective should be to improve the attractiveness and competitiveness of NI for the growth of economic and wealth creative activities. Without achieving this, the longer term ability to improve our transport systems will be endangered.

3. The Technical Supplements for each of the major urban areas are important proposals. We assume that consultation has already taken place with the local councils to ensure that local buy-in has been obtained for the plans and that this should continue throughout the period of the plan.

The draft plans for each town/city are a balance between the local requirements and the finance available. In many cases the finance may not meet the local need. We would encourage the development of long term plans for each urban area so that if the finance available in the plan is not sufficient to achieve the long term local requirements then in the years following the plan these additional requirements can be carried out.

4. In some cases the importance of the integration of the private car, the bicycle and walking into the public transport system has not been well developed.

Integration of private transport into the public transport system is important for sustainability. This is reinforced in the Draft which correctly recognises that it is unrealistic to provide frequent public transport over the whole region.

For instance Fig 5.2 shows clearly how little attention has been given to Park & Ride.

Park and Share although already starting to be provided for by the roads Service is scarcely mentioned.

In 5.5.1 it states that "where practical parking has also been proposed convenient to bus and rail stations". The use of the words "where practical" gives too much scope as to why it would not be provided.

5. The proposals for minimum periods of hourly service for public transport, Table 5.3 is welcomed. Funding must be secured to ensure that such services are primed until they become self financing. This should be considered in light of the 27.7% of households that do not have access to a car (Table 3.1).

6. We do not believe that the Department have gone far enough with the funding proposals to reflect the sustainable ethos. For example Table 8.1 gives a good overall summary of the SRTP costs totalling £2319.8M however only £5.9M has been allocated to rail proposals. This level of spend is not sufficient to provide even one major rail station on the network. If we are to encourage more users into modes other than the car we need to make the facilities more attractive with better stations including station parking and bus connections.

7. The difference between Public Hire and Private Hire taxis may be a hindrance to their effective employment as envisaged by the Draft.

8. The detail of expenditure is unclear and therefore whilst we welcome the expenditure in the draft plan until there is a scheme by scheme costing it is difficult to know if the sums shown are adequate or not. It is of concern that Paragraph 7.6.3 indicates that "subsequent assessments of the structural condition of these roads demonstrate that it may be necessary to boost the funding for structural maintenance on the SRTP above the investment levels indicated in the RTS in order to maintain the network to an acceptable condition" There is a need for this additional funding to be found but we do not accept that it should be taken from other areas of the plan. The funding for structural maintenance is required to allow all modes of transport to operate including buses and taxis. It is of the utmost importance to maintain the roads otherwise there are additional costs in carrying out work which would not have been necessary if the maintenance had been carried out at the correct time.

9. An expenditure of £27.3M over 9 years on accident remediation appears insufficient and minor compared to the overall roads expenditure. More attention could be paid to the large number of accident that can only be

prevented by improving the awareness and education of drivers. We do however believe that much of the other road expenditure will have the result of improving the safety of our roads.

10. The proposals for improved walkways and cycle routes are welcomed, however some of the proposals may not be capable of being implemented without the need for additional land. If these proposals are brought forward into local development plans, developers may be able to bring forward the proposals. However a mechanism has to be put in place to ensure that third party land requirements to facilitate these proposals do not lead to key land values.

11. The draft plan contains the total cost for each mode but gives no breakdown on a year by year basis. It is important for efficient planning by both the public and private sectors that the expenditure is as close to linear as possible. Peaks and troughs should be avoided to maximise efficiency and by so doing there will be reductions in the cost and time of construction to everyone's benefit.

12. The Regional Development Strategy set out a clear development vision for NI. We are not convinced that the SRTP supports all the main thrusts of its aim of Centres for Strategic Employment and Services.

Annex A – Appraisal Summary Table.

A Noise – We believe the proposals will have a Moderate Beneficial impact.

B Local Air Quality – We believe the proposals will have a Moderate Beneficial impact.

C Greenhouse Gases – The lack of attention to the integration of private into public transport has missed the opportunity to make significant reductions in Greenhouse Gas emissions.

D- Wider Economic impact – There is scope to make a significant beneficial impact.

E Transport Interchange – There is scope for significant beneficial impact.

We would be pleased to discuss any of the above issues or provide further information. Please do not hesitate to contact the regional office.

Yours sincerely

Wendy Blundell
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Northern Ireland Regional Manager