



promoting the voluntary sector

Northern Ireland Council for Voluntary Action

NICVA'S RESPONSE TO THE DRAFT SUB-REGIONAL TRANSPORT PLAN 2015

Cons 632 and EQUAL 239
23 June 2006

Draft Sub-Regional Transport Plan

1.0 Introduction

The Northern Ireland Council for Voluntary Action (NICVA) welcomes the opportunity to respond to DRD's draft Sub-Regional Transport Plan 2015. Our comments are informed by NICVA's role as the representative body for the voluntary and community sector and by a vision of society where all citizens are treated fairly, where sectarianism and discrimination are not tolerated and where respect for human rights and equality is regarded as the norm.

1.1 NICVA has long argued that Northern Ireland is over-dependent on the car and that this is one of the major failures in public policy development in the last forty years. Our policy manifesto states that public transport facilities are woefully inadequate and the impact falls disproportionately on people with low incomes or restricted mobility. Poor, or in many places no, public transport is a major contributor to social exclusion and isolation. We would therefore argue that transport policy should be considered in relation to social inclusion, community cohesion, child welfare and environmental damage. The increased emphasis on the importance of exercise to tackle obesity in children adds impetus to the need for healthy and sustainable forms of transport.

1.2 Therefore we welcome this draft plan with its detailed work and we agree with much of the analysis of problems in the section on Other Urban Areas (OUAs), including the variability in the standard of provision for pedestrians, the limited provision for cyclists and the underdeveloped local bus network. We note that households without a car in OUAs stands at 28.6 per cent. We agree with the listing of drivers for change including concerns over road safety and economic and demographic changes such as new housing and support the statement at 3.5.4: 'Transport infrastructure must be planned to service the needs of this new housing. This should aim to reduce further growth in car dependency and to minimise unwanted impacts on the town and city centres.'

1.3 We also note the department's acknowledgement at 4.2.3 that an average of 20.5 per cent of households in rural areas are without a car; at 4.3.4 that in much of rural Northern Ireland especially in the north and west, the majority of people do not live within easy reach of an existing bus service. We agree with the statement of problems including the limited facilities for pedestrians and cyclists and lack of public transport services and welcome the awareness of the links between transport and social exclusion at 4.5.2: 'Limited public transport services, as commonly occur in the rural area, may lead to social exclusion for residents. Where households have one car, this is commonly used to travel to work leaving other members of the household dependent on public transport or lift sharing. Distances to key services make walking impractical and taxis, where available, an expensive option.'

- 2.0 Having welcomed much of the analysis, we are therefore disappointed with the limited resource allocation to public transport, walking and cycling measures as opposed to roads. The plan allocates £1819.1 m to highways; £450.2m to bus measures; £5.9m to rail and £77.4m to walk/cycle measures. We are especially concerned by the meagre proposal of 2 return journeys per week in rural areas with populations of 50 – 499 (table 6.2). Yet the plan acknowledges at 4.2.1 that two-thirds of rural dwellers live in settlements with populations of less than 50 people or in the open countryside. This means that a large proportion of the rural population will still live beyond walking distance of key services and therefore will continue to need to use cars.
- 2.1 What is more, the Regional Transportation Strategy proposed new demand responsive transport (DRT) of four return journeys per month for residents living in deep rural areas and five for mobility impaired residents. But the SRTP proposes reducing the level by half to cut costs and plans to commission pilot schemes to determine the level of service. NICVA is very concerned that the department is prepared to consider reducing provision for some of the most vulnerable people in our society despite their knowledge of exclusion problems.
- 2.2 The document refers to the Rural Transport Partnerships which are operated by community groups to provide a range of door-to-door and group hire services including travel to work, educational outings, health and shopping journeys for older and disabled people. These valuable services are supported by the Rural Transport Fund, which also provides funding to Ulsterbus for 48 uneconomic but socially necessary services. The fund is currently under review but the document provides no discussion about the future role of these important partnerships.
- 2.3 The document alludes to developers playing their part in line with PPS3 but it only mentions pedestrian and cycle infrastructure. We would argue that more detail is needed about their contribution to all transport infrastructure measures which could release funds to boost public transport.
- 2.4 We recognise that there are several transport plans which cover all of Northern Ireland but we are confused by some of the statistics - this plan suggests £1819.1m for highways but other sources cite much higher sums. For example, a DRD press release on 19 June 2006 'Roads Service invests £6m in Fermanagh' states that over the next 10 years the draft ISNI envisages that £1.9billion will be invested in road building, subject to the availability of resources, economic appraisal and statutory approvals. What all the figures reveal is that the department is set on entrenching the car culture. The acknowledgement about reducing car dependency throughout the document must therefore be seen as rhetoric.
- 3.0 Conclusion
Despite the document's awareness of the need to reduce car dependency, there is a disappointing lack of investment in public transport, cycle and

walk provision. Compare this to Europe – Sweden has colder winters, Germany has higher car ownership, Switzerland has more hills, yet each has five times the share of bicycle trips compared to the UK. The Swiss public transport system is highly efficient and fully integrated and lately cycle routes have brought the sustainable transport dimension to life, according to Sustrans. They have been developed in partnership with the tourist industry, the railways, local authorities and commercial sponsors, with the routes repaying their investment from tourism revenue in the very first year. Denmark is notable because the programme for cycle promotion and road safety began in the 1970s as a clear political decision to reverse the negative implications of car growth. Cities such as Odense have managed to reduce the number of child pedestrian casualties by over 80 per cent since 1981.

NICVA therefore calls for similar political leadership to reverse the negative implications of car growth. We also reiterate the policy manifesto call for a target to ensure that 80 per cent of all households live within 10 minutes of a public transport stop.

4.0 Equality Impact Assessment

We welcome the data provided in the EQIA and the acknowledgement that 20 per cent is the figure for the prevalence of disability because previous documents have cited much lower figures and colleagues in the disability field have long argued that the real figure ranges from 20 to 25 per cent of the population. However we would disagree with the emphasis on the DDA throughout the proposals rather than on Section 75's rationale which is to promote equality of opportunity, including positive action measures to complement anti-discrimination legislation.

4.1 The document suggests that transport information will be made available on request to people who do not speak English as a first language. From experience we understand that this is too time-consuming and that most people are unaware that they can request this service. One suggestion would be to consider Budapest's excellent public transport guides which require no knowledge of the language and would improve accessibility for everyone.

4.2 We are most concerned by the lack of information about consultation on the EQIA. We would reiterate that the point of the whole Section 75 process is to encourage the promotion of equality at the heart of public policy, to increase participation and inclusion, to identify and remove barriers, ensure more profound communication and enhance decision-making. In order to comply with the guidance from the Equality Commission, an EQIA should show evidence of timely, open and inclusive consultation which means involvement at the early stages of planning.

4.3 We would also argue that data collection should consider multiple identities and be qualitative as well as quantitative - rather than reliance on paper-based correspondence and mass mailings, more informal dialogue and a variety of approaches at all stages will produce useful information to improve decision-making.