

**COUNCIL FOR NATURE CONSERVATION
AND THE COUNTRYSIDE**
An Advisory Council to the Department of the Environment
Room G-07, Waterman House, 5 – 33 Hill Street,
Belfast, BT1 2LA
Telephone: 028905 43184/43050
secretariat-hillst@doeni.gov.uk
www.cncni.gov.uk

Gregor Kerr
Department of Regional Development
Regional Planning and Transportation Division
Room 3-01
Clarence Court
10-18 Adelaide St.
Belfast BT2 8GB
Via E-Mail

Date 20 June 2011

Dear Mr. Kerr,

Regional Transportation Strategy 2011 – Public Consultation

CNCC is pleased to have the opportunity to comment on this important document. While CNCC does not have expertise in transport planning as such, our emphasis is on the ultimate effects of transportation on Northern Ireland's environment. CNCC supports a transport strategy that fully embraces the ethos of sustainability. The proposed strategy falls short of the mark in this regard, but contains interesting concepts for moving towards a more sustainable transportation system.

The existing RTS was published in 2002. By DRD's own admission, its roll-out ended up more skewed in favour of roads infrastructure than intended. Notwithstanding that, considerable investment resources were put into alternative transportation modes.

Chapter 2 – Where are we now?

Transportation trends analysis partially allows for current economic downturn, and reflects the increase in car ownership, service industries and goods transport by vehicles. At the same time, there were declines in numbers walking and in bus times in Belfast.

The challenges facing transport are acknowledged, and include the acceptance that building better roads eventually leads to greater road use and further congestion. The overarching principle is laid out as using the existing transportation systems in a smarter way, the subtext being that money for investment will be tight in the foreseeable future. However, the summary of challenges on p.22 is a list of rather bland platitudes that avoid any specific commitments to public transport, cycling, etc.

Q1. What do you believe are the major challenges to delivering an improved and more sustainable transportation infrastructure here?

Increasing efficiency of the transportation network in greatly reduced funding environment.

Public leadership. Changing the mindset of, inter alia, the Department officials and Stormont Executive away from improving the lot of the private car-driving public.

Hidden subsidies for private car usage, for example mileage allowances for some public servants, subsidised and/or guaranteed car-parking spaces in places of work.

Freight and goods delivery currently all being carried on roads and none on the rail network.

Q2. What are the challenges to society?

Acceptance that things are not as they were, with fuel increases and potential scarcity, greater congestion and a willingness to devote greater time to travelling.

Breaking the public addiction to the car.

Developing tourism based on natural resources.

Q3. Are there challenges to you as an individual?

Yes, and speaking on behalf of CNCC, we need to arrange our lives and work in different ways in order to reduce dependence on existing modes of travel. We face limitations due to Government cut-backs already, so we should be able to make further changes.

Q4. How should DRD respond to these challenges?

Conduct major advertising campaigns to wean the public off driving with no thought for environmental, health or economic consequences, along the lines of existing public health adverts about smoking, drinking, speed, etc.

Create an integrated public transport system with improved facilities for availing of buses and trains, for example:

- There are long-standing gaps in the rail station network that should be developed, such as at Templepatrick, Whitehouse, Limavady, Ballykelly, and west of Lisburn. These should be linked to urban centres by shuttle bus.
- Develop hubs for exchanging urban and rural express bus routes at locations such as Forestside in south Belfast.
- Develop integrated ticketing for public transport.
- Remove cash transactions on buses to speed journeys.
- De-regulating aspects of the public transport model to ensure greater flexibility, reflecting the success of the black taxi “revolution” in parts of Belfast as a reaction to difficult circumstances.

Integrated transport systems are essential for developing the tourism industry, so that tourists do not have to rely on private or hired cars. There needs to be greater connectivity between tourism centres using alternatives to the car and more efficient and natural linking of tourism centres. Develop more 2+1 stretches on main roads to avoid bottlenecks, rather than upgrading to motorway grade with the ensuing reduction in green space.

Develop a coherent system for establishing and enforcing cycle lanes (currently, many cycle lanes are ambiguously marked and ineffective except during clearway hours).

Develop a network of traffic-calmed streets (and roads in rural areas) to facilitate local and tourist cycling and walking across Northern Ireland.

Develop a sustainable transport code within the NI administration, and fully roll out schemes such as “Bike2Work” tax incentives.

Q5. Do you agree that particular interests should be mainstreamed in the Strategy rather than being considered separately?

Yes.

Chapter 3 – Where do we want to get to?

The essence of this chapter is about sustaining Northern Ireland's transport future, and as such, it falls very flat by not appearing to embrace challenging and radical ideas. It showcases a grand system of integrated transport in Bremen, but it is not clear if this is a real aspiration or simply something to whet the reader's appetite. The high-level transport aims are laudable as are the strategic objectives, but the objectives appear to have been formulated with little regard to the discussion in Chapter 2 concerning the challenges that face the country's transportation systems, economy and environment.

Q.1 Do you agree/disagree that growing the economy in a sustainable way should be at the core of our strategy, and if so, why/why not?

CNCC may agree, but only in the context of "sustainability" as enshrined in the Bruntland definition (ie. Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs). There is debate about the need for economic growth in the first place, but this is not the place nor is CNCC necessarily in a position to argue this point here.

The proposed high-level aim is to "support the growth of the economy", rather than to "grow" the economy, a slight but significant difference.

Q2 What do you see as advantages or disadvantages in this approach?

By weighing heavily on the economic-growth imperative for underpinning the RTS, the social and environmental strands of the strategy will immediately be seen as second-class aims. The three high-level aims should be given equal importance.

Q3 Do you agree with the Strategic Objectives proposed?

At face value, CNCC can support the strategic objectives. The suggestions put forward by CNCC in Chapter 2, Q.4 above should be read in conjunction with this answer.

Objectives 1-6 include some questionable specific points and clearly suggest, for example, the need to finish the work identified in the current RTS and Strategic Road Improvement Programme. However, the original RTS was designed in earlier/different times and the current and projected economic realities may suggest that current road infrastructure proposals will largely eat up future DRD transport budgets at the expense of the sustainable options.

Objective 5 refers to improvement of access in rural areas. This is akin to a retro-fitting exercise, as broader Executive policies appear to have encouraged and continue to encourage and facilitate a dispersed housing and business pattern in rural areas. In effect, it has led to rural suburbanisation and has led to a deeply unsustainable pattern of transport involving mass daily movements of people for school, work, shopping and recreation across large distances and poorly served by public transport. This greatly-increased volume of traffic on rural roads has become self-promoting, rendering cycling and walking well-nigh impossible and unsafe. This objective should be re-jigged to counter these destructive trends.

Objective 6 is related to tourism infrastructure, but it should be incumbent on DRD to comment on any new tourism developments to ensure that they contribute to this objective. It is not enough that a remote tourist attraction simply builds a nice big car park. It should be supported in developing initiatives to facilitate other means of accessing the facility other than simply by car/tourist coach.

Objectives 7 – 12 are necessary, but appear not to be backed up by any specifics. As a result they appear rather vague and woolly and aim to cover the legislative imperatives, such as the "biodiversity duty". CNCC regards Objectives 1-6 as the real meat in the RTS.

Objective 11 should be expanded to specifically refer to some of the tangible effects that road systems can have on biodiversity, such as deterioration in water quality from polluted surface

run-off, noise pollution and light pollution. Roads create physical threats and major local barriers to wildlife movement, particularly protected mammals such as badgers, bats and otters.

Q4 Please rank the strategic objectives as you see them.

As above, Objectives 1-6 are specific and tangible, and Objectives 7-12 are broad imperatives and not particularly strategic.

CNCC does not wish to rank the objectives, as they are all strategic and should be given equal weight. This is particularly important with regard to the prioritisation process that is proposed in Chapter 5.

However, CNCC would welcome any opportunities to take part in workshops to discuss the prioritisation process and other aspects of the evolving RTS.

Q5 Are there any other strategic objectives that you believe should be included?

Achieve a marked and measurable switch from private car usage to sustainable transport types across all regions of Northern Ireland.

Chapter 4 How will we get there?

CNCC supports the approach taken by DRD, in the identification of transportation interventions. This is at the risk of making any list of interventions definitive, and there should be a system in place to add new interventions that support the Strategic Objectives rather than wait for the next RTS to come along. The science of transport planning continues to develop and new case studies emerge that can be wholly applicable to Northern Ireland, and these should not be lost.

Q1 Do you agree with the interventions listed?

Q2 Do you have any other interventions to suggest?

The interventions form a good basis, and CNCC does not object to their inclusion. However, the table on page 38 is puzzling especially in respect of biodiversity protection, with 15 of the 22 interventions claiming to play a part in protecting biodiversity. If protecting biodiversity is seen as a strategic objective, there needs to be a more overt attempt to instil this in the interventions. Reduction of speed limits can be used more creatively, such as in the vicinity of tourist sites, public areas and links between sites that can be used by and promoted to cyclists and walkers. A prime example of this would be the stretch of road between Newcastle and Bloody Bridge in Co. Down, where pedestrian access to the mountain access point there is rendered impossible from the public transport hub of Newcastle due to a complete lack of traffic restriction.

Promotion of walking and cycling is supported, but this must be accompanied by realistic infrastructure, rather than ambiguous cycle lanes that appear and disappear along some roads. Specific cycling (and walking) routes through urban and rural areas need to be identified and marked and backed up by traffic calming and speed restrictions.

Restricting car parking in urban areas can also be done through pricing, making public transport alternatives more attractive.

One of the most significant environmental degradations caused by transport comes from noise pollution emanating from busy roads. This is particularly apparent in flat areas or where roads are raised above surrounding land. Earth bunds can easily be installed to greatly reduce road noise leaking to surrounding land.

Chapter 5 Making choices.

Q1 Do you agree with our proposals for a prioritised framework?

Q2 Have you any other prioritisation exercises to recommend?

CNCC welcomes the approach proposed by DRD to deliver the RTS. The examples from Australia show how reasoned decisions can be made and priorities identified when resources are tight. However, there is a long history of local political interference in making key transport infrastructure decisions, especially populist issues such as road schemes.

Therefore CNCC has some concerns about the fair implementation of such a system:

- 1 – the lack of clarity about how DRD might withstand and override excessive (local) political pressure on decision-making;
- 2 – the possibility of ranked strategic objectives being used as a means of weighing proposed programmes/projects;
- 3 – lack of clarity about an oversight mechanism for decision-making.

As stated earlier, CNCC would be willing and keen to participate in further consultative rounds.

Yours sincerely

A handwritten signature in black ink, appearing to read "Patrick Casement". The signature is written in a cursive style with a horizontal line underneath the name.

Patrick Casement
Chairman