



Belfast City Council

Report to:	Special Development Committee
Subject:	Review of the Regional Transportation Strategy – Draft Response
Date:	27th June 2011
Reporting Officer:	John McGrillen Director of Development ext 3470
Contact Officer:	Keith Sutherland Planning and Transport Policy Manager ext 3578

1	Relevant Background Information
1.1	The Minister for Regional Development launched the public consultation of the revised Regional Transportation Strategy for a 15 week period on the 16 th March until 28 June 2011.
1.2	The current Regional Transportation Strategy 2001 – 2012 was used to secure public funding for transport infrastructure projects throughout the region. The revised Strategy aims to build on what has been achieved and summaries where the region is at present in transportation terms.
1.3	The revised strategy seeks to set high level aims and strategic objectives for transport in the region that should form the basis for future decision making about funding priorities. It is stated that the revised document moves towards greater sustainability which will contribute positively to growing the economy, improving the quality of life for all and reducing transport impacts on the environment.

2	Key Issues
2.1	The revised Regional Transportation Strategy document does not contain a list of transport schemes and projects and does not set out any costs or targets. It sets out high level aims for transport and suggests Strategic Objectives against the aims. The Strategic objectives will be used to develop a Policy Prioritisation Framework, which is a new approach to transportation planning in Northern

	Ireland.
2.2	<p>The revised RTS document identified the following challenges for transport in Northern Ireland:</p> <ul style="list-style-type: none"> • Modal shift to more sustainable forms of transit • Reduce Emissions • Reduce impact of transport on climate change • Funding in the current economic climate • Achieve a balance in spending on roads versus public transport • Improve public transport reliability and affordability
2.3	<p>In place of the current RTS vision, the revised document proposes three high level aims:</p> <ul style="list-style-type: none"> • Support the Growth of the Economy • Enhance Quality of Life for All • Reduce the Environmental Impact
2.4	<p>The Department proposes 12 Strategic Objectives under the high level aims:</p> <p>Support the Growth of the Economy</p> <ol style="list-style-type: none"> 1. Improve connectivity within the region 2. Use road space and railways more efficiently 3. Better maintain transport infrastructure 4. Improve access in our towns and cities 5. Improve access in rural areas 6. Improve connections to key tourism sites <p>Enhance the quality of life for all</p> <ol style="list-style-type: none"> 7. Improve safety 8. Improve social inclusion 9. Develop transport programmes focused on the user <p>Reduce the environmental impact of transport</p> <ol style="list-style-type: none"> 10. Reduce greenhouse gas emissions from transport 11. Protect biodiversity 12. Reduce noise and air pollution
2.5	<p>The document proposes to agree a set of Strategic Objectives and asks for consultees to rank each objective in order of priority. Following the consultation the Department states that it will work with stakeholders to develop an overall Transportation Prioritisation Framework which will contain a list of potential strategic transport interventions to support the Strategic Objectives. An initial list transport interventions is outlined in the document and includes the following:</p> <ul style="list-style-type: none"> • Selective road improvements to address bottlenecks • Improved connections between different modes of transport • Prioritisation of road space for public transport • Introduction of more Park & Ride facilities
2.6	<p>Following consultation, and publication of the final RTS, the Department outlines the next stages as follows:</p> <ul style="list-style-type: none"> • Apply the Prioritisation framework to a list of transport interventions and arrive at an Initial Prioritised list • The prioritised list of transport interventions would be subject to Transport Assessments • A decision will be taken on the Strategic Transport interventions to proceed linked to the Comprehensive Spending Review • A Draft Delivery Plan 2015 will be published linked to the Draft Budget

2.7	<p>The Council suggested response to the revised RTS consultation document is outlined in Appendix 1. The draft response is broken down under the DRD headings:</p> <ul style="list-style-type: none"> • Where are we now? • Where do we want to get to? • How will we get there? • Making choices • What will we do next?
2.8	<p>A summary of the main issues raised are as follows:</p> <ul style="list-style-type: none"> • In relation to the high level aims, the Council recognises that transportation infrastructure and services are an essential part of economic activity however, it must not be at the expense of supporting society and protecting the environment. The Council would suggest that the high level aims are more specific such as the equivalent aims in the Scottish document 'Improve journey times and connections'. • The Council generally supports the strategic objectives outlined in the revised document and suggests a few minor amendments and additions to ensure alignment with the key objectives already identified in the Councils Transport Policy and the Belfast Masterplan. The Council would have a difficulty in ranking the specific strategic objectives as it may introduce an inappropriate bias of transport schemes where, for example, economic growth overrides environmental concerns. • The Council would suggest further clarification is required on the new 'Policy Prioritisation Framework' approach. • In considering Strategic Transport interventions, the Council is currently revising the Belfast Masterplan which has identified priorities in relation to transport in the Belfast area. The Belfast Masterplan Transportation objectives are outlined in the draft response in Appendix 1 and the Council would recommend that the DRD considers alignment with the strategic interventions outlined in the revised RTS.

3	Resource Implications
3.1	None

4	Equality and Good Relations Considerations
4.1	There are no equality and Good Relations Considerations attached to this report

5	Recommendations
5.1	Members are requested to consider the draft response to the RTS outlined in Appendix 1 as if appropriate agreed a final response to be submitted to the Department for Regional Development by the 28 th June 2011.

6	Decision Tracking
Submit response to draft RTS	
Timeline: June 2011	Reporting Officer: John McGrillen

7	Key to Abbreviations
RTS - Regional Transport Strategy	
DRD - Department For Regional Development	

8	Documents Attached
Appendix 1 – Draft RTS Response	

Appendix 1 – Draft Response

Belfast City Council Response to the Regional Transportation Strategy 2011

1.0 Introduction and Context

The Minister for Regional Development launched the Public Consultation of the revised Regional Transportation Strategy for a 15 week period on the 16th March until 28 June 2011.

As civic leader Belfast City Council seeks to be proactive in influencing transport policy for Belfast and the wider region. In recent years Belfast has become a competitive tourist destination, a desirable place to live and work and an attractive place to invest. With growth and prosperity however, there has been a continuing increase in the use of the car, which cannot be sustained. The Council is concerned about how the city will cope with the increasing demands on our transport infrastructure.

The Regional Transportation Strategy (RTS) 2002-2012

The Regional Transportation Strategy was originally published in 2002 with the following vision:

“To have a modern, sustainable, safe transportation system which benefits society, the economy and the environment and which actively contributes to social inclusion and everyone’s quality of life”

As stated in the original document The RTS, as a “daughter document” of the Regional Development Strategy (RDS), identified strategic transportation investment priorities and considered potential funding sources and affordability of planned initiatives over the following 10 years.

At the time, the Strategy provided a range of transportation initiatives across Northern Ireland to improve our transportation structure, promote sustainable travel and encourage the use of modes of travel other than the car, including:

- Quality Bus Corridors (QBCs) on all main Belfast Commuter routes;
- Commencement of a rapid transit system on the BMA;
- Strategic highway improvements to provide, for example, up to 14 bypasses, approximately 85 kilometres of dual carriageway and 11 major junction improvement.

In finalising the RTS it was recognised that demand management measures would be required in Belfast, both to optimise the contribution of the additional public transport investment and to reduce the possible negative impacts of additional car use. The strategy noted, therefore, that following the planned improvements to public transport, parking charges could be raised and/or parking availability reduced for long-stay commuter parking.

The 2002 RTS set a number of targets for 2012 for various modes of travel within the region. In addition, the development of 3 separate Transport Plans to deliver the strategic objectives of the RTS facilitated the development of additional targets in relation to average traffic speeds on Key Transport Corridors and key routes in the Belfast Metropolitan Area, as well as the establishment of targets for the coverage of bus services and enhanced services.

Belfast City Council

Through the engagement in this consultation and with the Department for Regional Development, the objective is to strengthen the Council’s role in leading the social and economic regeneration of Belfast. The Belfast Masterplan advocates greater responsibility for the Council as the sole political authority with a remit for Belfast, based on the view that

effective city governance and leadership are key requirements to achieving interrelated regeneration and transport objectives.

In this context, the Council has recently developed its own Transport Policy as a framework for the Council to lead by example and help shape transportation in the city in a sustainable, accessible, and cost-effective way for all who live, work and visit the city. The key objectives of the Council's policy include:

- To seek to influence the development of transportation policies and proposals which improve connectivity and encourage modal shift away from the private car to more sustainable forms of travel such as walking, cycling and public transport; and
- To seek to ensure a higher level of emphasis of capital on sustainable transportation schemes, ensuring that the priority is allocated to sustainable modes such as walking, cycling and public transport schemes.

As part of the Public Consultation process for the revised RTS the Department of Regional Development's (DRD) Regional Transportation Division produced the Regional Transportation Strategy 2011 - , A Sustainable Transport Future – Public Consultation Document.

This response outlines the Council's understanding and views on the Public Consultation for the revised RTS, and these are expressed under the headings contained in the Public Consultation Document for which the Department have specifically requested feedback, broken down into the following themes:

- Where are we now?
- Where do we want to get to?
- How will we get there?
- Making choices
- What will we do next?

2.0 Where are we now?

This section of the Public Consultation Document attempts to set the scene putting transportation issues in context and highlighting some background information with respect to the economy, society and the environment.

The Public Consultation Document then goes on to highlight the progress of the RTS against the principal initiatives and it is this point and in particular the implementation of initiatives affecting Belfast that are further examined at this juncture.

Public Transport

The Council notes the investment that has occurred over the life of the RTS 2001 in the provision of new, modern trains and buses, as well as the construction of new bus stations at Lisburn and Coleraine and a combined bus and rail station at Bangor. All these help facilitate sustainable travel to and from Belfast.

As stated in the introduction to this response, the existing RTS committed to the development of QBCs on all main Belfast commuter routes. This has not happened on a number of the main arterial routes into Belfast, and on other routes where QBC's have been launched, bus priority measures have been installed intermittently, for example the Newtownards Road. This has resulted in limited success for bus journey time reliability and

evidence that, at existing bottlenecks and pinch-points on the network, road space allocation remains heavily biased towards private vehicles.

The implications of this are reflected in the Trends in Transport Section of the Public Consultation Document which identifies that from 2001-2009, average bus speeds in Belfast fell by 11%. This compares with results for car speeds which over the same time period increased by 21% on 11 surveyed corridors in Belfast.

A key issue in providing attractive public transport services is connectivity but Belfast's bus network continues to suffer from a lack of through services, travelling through the city centre as opposed to terminating there. This is coupled with a lack of orbital services which provide travel to areas other than the city centre along arterial routes.

The existing RTS also identified the commencement of a Rapid Transit System in the Belfast Metropolitan Area (BMA) as a principal initiative. This has not happened and the Council has concerns that commencement of the development of preliminary designs for a pilot rapid transit network represents the progress in the 10 years since the RTS was published. This compares with the construction and operation of bus based rapid transit systems Fastway Crawley/Gatwick, Fastrack, Kent and ftrmetro Swansea (to name a few), all since 2002.

Cycling and Walking

The Council notes that there has been some increase in the number of people walking in Belfast but the trend across the region is downwards. Whilst the trend upwards in the number of people walking in Belfast is welcomed, there is no commentary on what measures have been introduced which may have contributed to this.

In relation to cycling it is clear that the targets which have been identified in the existing RTS for 2005 had still not been achieved by 2008.

Parking

With regards to the existing RTS statement regarding the introduction of demand management measures in Belfast and the reduction in the number of parking spaces available for long stay commuter parking, the Council notes the enhanced enforcement that the introduction of decriminalised parking has provided, however, the continuing abundance of both free and subsidised parking in Belfast, for example, on derelict development sites, or in adjacent residential areas, remains a major barrier to achieving significant modal shift.

Highways

The Council, in response to the consultation paper 'Developing a Regional Transportation Strategy (RTS)' in 2001 stated that there had been an over emphasis of funding on roads at all levels. The resulting 2001 RTS vision, coupled with the targets for 2012 which it set were seen as an opportunity to redress this balance and move towards the development and promotion of a more sustainable and efficient transportation network which would facilitate a modal shift away from the private car.

It is clear that despite the vision and sustainable objectives of the existing RTS, the emphasis of the strategy remained with providing new and upgraded highway capacity. This was further emphasised by the suggested spending ratio for roads (including walking and cycling) to public transport of 65:35 in the existing RTS, which subsequently moved, as a result of the investment strategy, to a ratio of 80:20.

Air Quality

When considering the proposed RTS commitments relating to the management of air quality, it should be noted that the European Commission introduced the Air Quality Framework Directive in 1996, followed by a series of Daughter Directives designed to assist member

states to manage air quality effectively thereby safeguarding public health. The Daughter Directives established health-based standards known as limit values for a series of common ambient air pollutants, which were to be met by a range of target dates. In addressing their obligations under the Directive, the European Commission directed that member states should maintain ambient air quality where good and improve it in other cases.

In terms of characterising the impact of poor air quality upon human health, a pollutant such as nitrogen dioxide (NO₂) typically damages cell membranes and proteins but at higher concentrations, it can result in acute inflammation of the airways. Particulate matter (PM₁₀) also impacts upon lung function and may contribute towards excess mortality rates. Sulphur dioxide (SO₂) stimulates nerves in the lining of the nose, throat and the lungs which can lead to a feeling of chest tightness and a narrowing of the airways. This latter effect is particularly likely to occur in people suffering from asthma and chronic lung disease. Other common ambient air pollutants such as benzene (C₆H₆) and 1,3-butadiene (C₄H₆) are classified as carcinogens.

In 2008, the European Commission introduced Directive 2008/50/EC on Ambient Air Quality and Cleaner Air for Europe which merged existing air quality legislation into a single directive and also provided for time extensions of three years for particulate matter (PM₁₀) or up to five years for nitrogen dioxide (NO₂) and benzene (C₆H₆) for complying with limit values, based upon conditions and assessment by the European Commission.

In order to fulfil its obligations under the Air Quality Framework and subsequent Directives, the current overarching United Kingdom government strategy for managing air quality is the Air Quality Strategy for England, Scotland, Wales and Northern Ireland, as published in July 2007. The UK government has indicated that air pollution causes annual health costs of roughly £15 billion to UK citizens and that poor air quality tends to predominate in densely populated urban areas, so human exposure is significant.

From a Northern Ireland context, Part III of the Environment (Northern Ireland) Order places a statutory obligation upon district councils to review periodically air quality within their districts in order to determine whether objectives are likely to be achieved in compliance years. Where, as a result of an air quality review, it appears that any air quality standards or objectives are not being achieved, or are not likely to be achieved within the relevant period then the council is required to designate by order, as a minimum, the spatial extent of the exceedence as an Air Quality Management Area.

The district council is also required to develop a written action plan in pursuit of the achievement of air quality standards and objectives within the designated Air Quality Management Area. The plan must include actions that the council will undertake as well as actions from other relevant authorities. The Air Quality Regulations (Northern Ireland) 2003 prescribe a range of relevant authorities including the Department for Regional Development. The Department for Regional Development has responsibility for transport strategy and sustainable transport policy, provision and maintenance of all public roads and public transport policy and performance.

Belfast City Council completed a review and assessment of air quality across the city in 2004 and declared subsequently four Air Quality Management Areas for exceedences of particulate matter (PM₁₀) and nitrogen dioxide (NO₂) standards. Supplementary research indicated that the principal source of particulate matter and nitrogen dioxide within the Air Quality Management Areas was road traffic. The four Air Quality Management Areas border arterial routes into the city as follows-

- The M1 / Westlink corridor from the Belfast City boundary at Sir Thomas and Lady Dixon Park to the end of the Westlink at the junction with Great George's

Street and York Street including Stockman's Lane and Kennedy Way. This area was declared for predicted exceedences of both the nitrogen dioxide and particulate matter annual mean air quality strategy objectives as well as exceedences of the particulate matter 24 hour mean objective and the nitrogen dioxide 1 hour mean objective.

- Cromac Street to the junction with East Bridge Street and then from East Bridge Street to the junction with the Ravenhill and Albertbridge Roads and Short Strand. This area was declared for predicted exceedences of the nitrogen dioxide annual mean air quality strategy objective.
- The Upper Newtownards Road from the North Road junction to the Belfast City boundary at the Ulster Hospital incorporating the Knock Road to the City boundary at Laburnum Playing Fields and Hawthornden Way. This area was declared for predicted exceedences of the nitrogen dioxide annual mean air quality strategy objective.
- The Ormeau Road from the junction with Donegall Pass to the City boundary at Galwally. This area was declared for predicted exceedences of the nitrogen dioxide annual mean air quality strategy objective.

Belfast City Council published an Air Quality Action Plan for the city in 2006, designed to achieve the particulate matter air quality standards as soon as possible, and to achieve the nitrogen dioxide standards by 1st January 2010. As the pollutants were attributed principally to road transport, the plan predominantly comprised actions by the Department of Regional Development and its Agencies. Accordingly, the Department for Regional Development Roads Service contributions were based upon the Belfast Metropolitan Transport Plan, which is scheduled to conclude in 2015, subject to economic appraisal, statutory function and funding availability.

At present, ambient air quality monitoring indicates that nitrogen dioxide concentrations continue to exceed United Kingdom and European health based standards in all Belfast Air Quality Management Areas. Standards for particulate matter were only recently achieved along the Westlink corridor however, it is unclear whether the downward pollution trend will be maintained. In addition, ambient levels of nitrogen dioxide are also elevated at a number of other roadside locations across the city and therefore, may eventually result in the declaration of further air quality management areas. Accordingly, it is understood that the Department of Environment (DoENI) and the Department for Environment, Food and Rural Affairs (DEFRA) are currently assessing the need to submit an application to the European Commission seeking a time extension of up to five years for the Belfast agglomeration for compliance with nitrogen dioxide standards.

The council would also wish to highlight the social equity issues in relation to ambient air quality across the city. Belfast residents are exposed to some of the highest levels of transport related air pollution in Northern Ireland despite experiencing the lowest levels of household car ownership. (Department for Regional Development Travel Survey for Northern Ireland In-depth Report 2007-2009).

Conclusion

In conclusion, whilst the existing RTS 2001 document was successful in obtaining funding for a number of transportation infrastructure investments, in the interim years, it has failed to fully realise a number of its objectives and targets. The early aspirations of a more equitable and sustainable funding package did not materialise.

There is clearly the need for a more detailed review of the RTS including its success and failures and this should be a keystone in taking forward any revised Regional Transportation Strategy. There are a number of areas where there is clear under-performance and more detailed analysis of these 'gaps' is an important area and should inform the direction and emphasis of policy in the future.

Trends outlined in the Public Consultation Document, figures for 2007 showed that 83% of all home to work journeys in Northern Ireland were by car compared to 79.9% at the time the existing RTS was published in 2002. This compares to 71% in England, 69% in Scotland and 62% in the Republic of Ireland.

This illustrates that the existing RTS strategy has left Northern Ireland lagging behind in promoting modal shift and providing a sustainable transportation system. The revised RTS Strategy needs to proactively address this situation.

3.0 Where do we want to get to?

As stated in the Public Consultation Document, our transportation systems and infrastructure need to be developed so they are fit for the 21st century. The new direction for transportation needs to have at its core, the drive for sustainability in the travel choices we make and therefore public transport, cycling and walking should be safer, convenient, reliable and more environmentally friendly alternatives to the car, making them the first choice for people and business, not the last resort.

The Revised Strategy Methodology

The existing RTS set out a transport vision statement and proposals which were assessed against five key objectives of Environment, Safety, Economy, Accessibility and Integration. However, the strategy initially concentrated on identifying solutions to existing problems in the network. It was only after these options for solutions were compiled as a long list of options, were they subject to appraisal against the five objectives. This approach, coupled with the pre-determined funding split and the requirement to reduce the highways' structural maintenance backlog allowed a favourable prioritisation of new and upgraded highway schemes.

It is clear that the revised strategy as outlined in the Public Consultation Document takes a different approach. Instead of a vision there are now three high level transport aims proposed, namely:

- A. Support the Growth of the Economy
- B. Enhance Quality of Life for All
- C. Reduce the Environmental Impact of Transport

The document then proposes 12 Strategic Objectives that are linked back to the aims. These objectives are anticipated to help achieve more sustainable transportation networks and are:

1. Improve connectivity within the region;
2. Use road space and railways more efficiently;
3. Better maintain transport infrastructure;
4. Improve access in our towns and cities;
5. Improve access in rural areas;
6. Improve connections to key tourism sites;
7. Improve safety;
8. Improve social inclusion;
9. Develop transport programmes focussed on the user;

10. Reduce greenhouse gas emissions from transport;
11. Protect biodiversity;
12. Reduce noise and air pollution.

It is our understanding that, in order to be considered on a prioritised list of options, any proposed scheme must be assessed against the 12 strategic objectives in the policy prioritisation framework to ensure their 'policy fit'. This is an added level of 'prior assessment' which was not present in the existing RTS and given that the strategic objectives have been tailored to the overall goal of sustainable transportation networks, this methodology could ensure that any schemes or interventions which are taken forward for delivery will have sustainability and environmental consideration as key elements.

High Level Aims of RTS 2011

In line with the Executive's stated key focus, the Council would consider that the growth of the economy is key to the success of Northern Ireland, in terms of providing a region where business can thrive and attracting inward investment. Coupled with this, the Council would stress the fact that Belfast is the primary economic driver of the entire region and therefore the city's economic success is crucial for the growth of the entire Belfast region and Northern Ireland as a whole.

It is acknowledged that transportation infrastructure and services are an essential part of economic activity but these need to be developed sustainably as there are obvious environmental implications to transport spending.

In this context, the Council would welcome the '*Reduction of the Environmental Impact of Transport*' as a high level aim.

It is hoped that the presence of this high level aim will ensure that any transportation schemes which are prioritised due to their positive implications for economic growth, need to be sustainable in order to also contribute to the reduction of the environmental impact of transport. These are not mutually exclusive and we note the findings of the Stern Review – "The Economics of Climate Change" which indicated that a well-designed transportation strategy can support economic growth and tackle carbon emissions. This is a key factor in the region's attempts to achieve the legally binding targets for the reduction of greenhouse gas emissions discussed earlier in this response.

During the Council's own consultation process the content of the high level aims were debated. There was comment that the aims should be more specific. For example in Scotland, their equivalent aims are: Improve journey times and connections; Reduce emissions; and Improve quality, accessibility and affordability. However it is noted that the Strategic Objectives highlighted in the Public Consultation Document pick up particular points and specifics such as reduction greenhouse gas emissions.

Strategic Objectives of RTS 2011

The Public Consultation Document asks the reader to rank the Strategic Objectives proposed in terms of importance. It is the view of the Council that all the Strategic Objectives should have equal rank as the prioritisation of any strategic over another (for example, '*improved connectivity within the region*' over '*reduce noise and air pollution*') may lead to a bias in favour of less sustainable interventions. In addition, the prioritisation of Strategic Objective number 5 - '*Improve access in rural areas*' over Strategic Objective number 4 - '*improve access in our towns and cities*' may lead to a bias in terms of funding of schemes in the rural areas compared to Belfast.

With regard to the strategic objectives proposed, the Council would be of the opinion that '*Improved Journey Times*' should be included as a strategic objective and on the basis of

sustainable travel modes, or at least coupled with the *'improved connectivity'* objective. This is a key transport objective of the Council's Masterplan (Belfast: The Masterplan 2004 - 2020), which is discussed later in this document.

It is noted that Strategic Objective number 1 commits to *'Improved Connectivity within the Region'*. The Council believes that connectivity is a key issue for economic development and social inclusion within Belfast and therefore would be of the opinion that connectivity needs to be a key objective within towns and cities, as well as within the region. We would therefore suggest that strategic objective number 4, *'improved access in our towns and cities'* is revised as *'improved access and connectivity in our towns and cities'*.

We would also suggest that Strategic Objective 2 *'Use road space and railways more efficiently'* should be changed to *'Use the transportation network more efficiently'* as this encompasses all modes not just roads and railways and would address integration of transport modes.

The Council would also consider that *'improved health'* should be considered as a strategic objective under the *'Enhance the quality of life for all'* high level aim as the improvement and promotion of walking and cycling will have direct benefits to people's health.

The Council notes that the Regional Transportation Strategy 2011- contains a commitment towards sustainable development and an acknowledgement that *'society and economies are completely dependent upon the environment which encompasses them and are therefore bound by its limits and capabilities'*. Referring to the May 2010 Everyone's Involved - Sustainable Development Strategy, strategic objective 4 on *'striking an appropriate balance between the responsible use and protection of natural resources in support of a better quality of life and better quality of environment'* makes specific mention of air quality in the context of ensuring that an appropriate policy and legislative framework is in place supported by a regulatory regime which will deliver statutory environmental standards in respect of air, water and other environmental pollution.

Accordingly, the council is pleased to note that the Department for Regional Development has included a strategic objective within the draft Strategy document of reducing noise and air pollution (C.12 - page 29). However, in view of the extent of the statutory and other obligations on the Department in relation to air quality, current ambient pollutant concentrations and the direct disbenefits to public health, the council is disappointed to note the nature of the Department's subsequent commitment towards air quality as detailed on page 32 – *'we will seek to reduce noise and air pollution wherever possible'*. The council would recommend a definitive commitment to achieve the air quality standards at the earliest opportunity and maintain them thereafter.

With regard to climate change, the draft Strategy highlights that transportation currently accounts for around a quarter of man-made greenhouse gases in Northern Ireland. Accordingly, the draft Strategy commits to reducing greenhouse gas emissions from transportation. The council is disappointed, however, to note that the Department has chosen to deal with greenhouse gas emissions and ambient air quality as distinct issues. By way of amplification, the March 2010 Department for Environment, Food and Rural Affairs (DEFRA) publication entitled *'Air Pollution: Action in a Changing Climate'* highlights that climate change and air pollution share common sources and that changes in the climate will impact on air quality. Furthermore, the 2007 Air Quality Strategy for England, Scotland, Wales and Northern Ireland concludes that after many years of significant improvement, air quality benefits are becoming increasingly costly to achieve, making actions difficult to justify on an air quality basis alone. However, when climate change considerations are included in the evaluation process, then actions are more easily justified such as in the case of the promotion of low or zero emission vehicles. In the longer term, take-up of ultra low emission

vehicles in urban areas where air quality is a priority will likely result in significant public health benefits.

It should be noted that DEFRA and the devolved administrations are considering the recommendations of a recent review of local air quality management across the United Kingdom. The review included recommendations to build upon synergies between climate change and air quality policies and actions at local level. Therefore, the council recommends that the draft Strategy should be amended to emphasise the synergies between ambient air quality and climate change in order to reflect overarching United Kingdom government policy and in order to derive maximum local environmental and public health benefits. By way of example, there are clear air quality, climate change and public health implications for the proposed transport interventions relating to the use of alternative fuels in publicly owned vehicles and public transport and to advising on vehicle choice and promoting the use of alternative and renewable fuels amongst consumers (page 43).

The Strategic objectives outlined in the Public Consultation Document and the suggested revisions outlined above would ensure general alignment with the key objectives in the Council's Transport Policy and the Belfast Masterplan. There are, however, a number of key objectives in the Council's Transport Policy relating to Belfast's airports and port of which cognisance should be taken. These are as follows:

- The sustainable future development of Belfast's airports to ensure continued connectivity to Belfast City Centre and a high level of accessibility by sustainable modes of travel;
- The potential for implementation of new public transport interchanges at George Best Belfast City Airport;
- The sustainable development of Belfast port to ensure continued connectivity to Belfast City Centre and the strategic road network; and to ensure a high level of accessibility by sustainable modes of travel;

In addition we note that policy directions set out in the consultation document for the review of the Regional Development Strategy in January 2011 set out the importance of the metropolitan area centred on Belfast as the driver for economic growth.

It is the view of the Council that, given the key Executive Priority of economic growth, a Strategic Objective should relate to the metropolitan area centred on Belfast and should be *'Improved access and connectivity within and to the Belfast Metropolitan Area (BMA)'*

Alternatively, Strategic Objective 4 could be amended to read *'Improved access and connectivity in our towns and cities and in particular the Belfast Metropolitan Area (BMA).'*

4.0 How will we get there?

This section of the Public Consultation Document outlines the current way in which schemes are implemented and sets out the types of interventions that would contribute to at least one of the strategic objectives set out in the previous section.

The current process for evolving a transportation strategy into a scheme or intervention 'on the ground' involves identification of a transport initiative within the RTS which is then implemented through a specific development plan.

Transportation Interventions

Section 4.3 of the Public Consultation Document has identified a list of what it terms strategic interventions. These are intended to support the Strategic Objectives discussed previously.

It is our assumption that these '*strategic*' interventions represent themes or headings under which '*specific*' interventions would be brought forward and assessed through the policy prioritisation framework. This point is not particularly clear within the document and would require clarification

However, this would seem to be consistent with the example of the policy prioritisation framework from South-East Queensland presented in Section 5.2 of the Public Consultation Document, as well as the comments in Section 6 of the Public Consultation Document which states that a long list of possible transport interventions will be drawn upon agreement of the Policy Prioritisation Framework.

In addition it is considered necessary for the Department to clarify this issue there is some ambiguity in the wording of Section 4.2 which leads the reader to initially believe that only the '*strategic*' interventions identified are to be taken forward for assessment against the strategic objectives as opposed to '*specific*' interventions which are mentioned later in the document.

Strategic Interventions

In considering the Strategic Interventions contained in the Public Consultation Document, we have considered the proposals contained in the Belfast Masterplan. As part of its key objectives, the Masterplan aims to deliver an accessible and sustainable city for future generations and recognises that it is both more sustainable and economic to provide access to the city centre by public transport rather than by expanding the road network capacity. This means limiting the use of cars for journeys that could be made by public transport. The Masterplan identifies key strategic interventions to impose these limits including:

- Making public transport an attractive, preferred mode of travel; by controlling the amount of car parking; by road closures, or by charging road users
- Reclaim road space from the private car;
- Control on-street parking more rigorously and limit the provision of off-street space;
- Enhancement of bus services by provision of through-services linking the different quadrants of the city; the introduction of orbital routes, increased frequency, effective priority and related enforcement;
- Reclaim road space for pedestrians and cyclists

We note the following Strategic Transportation Interventions in the RTS Public Consultation Document which would generally align with the Masterplan's transportation objectives:

- Improved connections between different modes of transport;
- Prioritisation of road space for public transport;
- Introduction of more Park and Ride facilities;
- Good transport solutions to Growth Areas and Town and City Centres;
- Introduction of further innovative public transport services which meet the needs of communities;
- Promotion of walking and cycling;
- Restricting car parking in Towns and Cities;
- Enforcing Parking and Traffic Offences;

We would request, however, that to fully complement the Masterplan's strategic interventions outlined above, revisions to the wording of some of the RTS Strategic Interventions would be required, and these are outlined as follows:

- *'Prioritisation of Roads Space for Public Transport'* should be revised to *'Prioritisation of Roads Space for Public Transport, Walking and Cycling'*. This would safeguard the Masterplan's objective to *'reclaim road space for pedestrians and cyclists'*.
- *'Good Transport Solutions to Growth Areas and Town and City Centres'* should be revised to *'Sustainable Transport Solutions to Growth areas and Town and City Centres'*
- *'Promotion of Walking and Cycling'* should be changed to *'Improvement and Promotion of Walking and Cycling facilities'*

In addition to the points raised in relation to the Strategic Interventions, the Council would note that the Public Consultation Document contains no reference to targets (e.g. a desired Modal Split) within the lifetime of the revised Strategy. We would request that the Department clarify its position on how the success of each of the strategic interventions in achieving the Strategic Objectives of the Strategy can be gauged in the absence of any targets or monitoring.

Specific Interventions

In terms of the development of specific interventions which would contribute to the strategic objectives of the RTS, the Council has already identified a number of proposed improvements to the city within the Masterplan and the Council's Transport Policy document. The Council would continue to advocate the need for close engagement with local councils during the selection of specific interventions to ensure that the Council's proposals are safeguarded and there is a specific role for local councils in planning and delivering transport, especially in light of the review of public administration (RPA).

This point is further strengthened by the fact that it is unlikely that there will be funding for a suite of Transport Plans to deliver the specific interventions, as was the case with the existing RTS. The Council considers it vital that, given its status as the economic driver for the region, Belfast is fairly represented in any Regional Delivery Plan. The Department states in the Public Consultation Document that:

"A significant amount of recent work has been carried out around the transport needs of communities and businesses that may preclude the need for new Transport Plans. These include Active Travel and Freight Plans, Roads Service and public transport providers' corporate and business plans and local Masterplans".

The Council is of the opinion that should this approach be adopted by the Department, the proposals of the current Belfast Masterplan are included in any Regional Delivery Plan.

The Council would be of the opinion that the main challenge for delivering an improved and more sustainable transportation infrastructure will be to make public transport, walking and cycling, an accessible, attractive alternative to using the car and the preferred choice for travel throughout Northern Ireland. A key objective of the Council's Transport Policy is:

"to ensure a higher level of emphasis of capital expenditure on sustainable transportation schemes, ensuring that the priority is allocated to sustainable modes of travel such as walking, cycling and public transport schemes".

The Council therefore believes that the existing funding ratio outlined previously in this response provides a major barrier to promoting a culture change and subsequent modal shift from private car use to more sustainable transportation modes and the historic spending ratio in favour of roads has led to a level of infrastructure which is inadequate to aid the implementation of innovative sustainable policies.

It is the view of the Council, that as we face a prolonged period of reduced public expenditure, there should be a priority given to relatively low cost, sustainable measures such as bus priority, walking and cycling rather than the large road schemes which would utilise the majority of this constrained budget. In addition, the need to implement quality bus corridors and improve bus frequency should be given priority in the revised strategy. Additional specific interventions that the Council would advocate for inclusion in the Strategy include:

- Quality Bus Corridors;
- Orbital Public Transport Routes;
- Active Travel Initiatives;
- Rapid Transit;
- Park and Ride;
- Connectivity to airports and ports by sustainable means; and
- Gamble Street Station linked to new developments such as the University of Ulster campus and regeneration proposals in the northern part of the city centre

5.0 Making Choices

This section of the Public Consultation Document identifies what it describes as a new approach to implementation. This objective led, rather than problem led, approach developed through a number of transport studies in the early 1990's where the 'top down' (objective led) and 'bottom up' (problem led) were different approaches to the development of transport strategies.

The objective led approach outlined within the document highlights an approach that takes a broad view on which programmes or schemes will contribute to specific policy objectives.

Policy Prioritisation Framework

It is our assumption that the process through which this will take place is using the Policy Prioritisation Framework which scores individual specific interventions against the strategic objectives of the Strategy to ensure their 'policy fit'.

The Council notes that the DRD states that they will work with key stakeholders to develop an agreed Policy Prioritisation Framework and scoring guidance. As stated above, there is a need for close engagement with local councils in planning and delivering transport. One of the key internal policy objectives of the Council's Transport Policy states that:

"In line with the proposed transfer of local planning functions to local councils, we will adopt a strong and public leadership role in the promotion of sustainable development of the city of Belfast and will ensure a consistent and integrated approach to land use and transport planning"

The Council Transport Policy also outlines a desire to develop effective working relationships with appropriate delivery agencies for the delivery of local transportation schemes to support local communities and integrate with a community planning approach.

Given the importance of ensuring that the Policy Prioritisation Framework and associated scoring guidance integrates transport with other existing and emerging Executive strategies and policies such as RDS, it is essential that the Council should have the opportunity to engage with the Department in compiling the Policy Prioritisation Framework and the scoring guidance. It is also considered that this should be published for consultation prior to agreement of the final Framework composition.

The Council considers that the Policy Prioritisation Framework approach allows the development of sustainable transport corridor plans (as required by SPG-BMA 3 in the RDS), whereby sustainable modes of travel can be assessed under the same scoring criteria as competing road schemes to highlight their advantages in achieving all the strategic objectives of the RTS and therefore allowing prioritisation for these sustainable measures over the provision of new or additional highway capacity. Transport Corridor Plans should be formulated to integrate the development of sites, in particular housing and employment, with the proposed transport network and provide a phased programme for implementation of improvements to transport infrastructure and services that enhance accessibility for all.

6.0 What will we do next

The Public Consultation Document outlines what steps will be taken following the application of the Policy Prioritisation Framework and states that the Initial Prioritised List would be subject to Transport Assessment where the Department would take into account value for money, equality and environmental considerations and political / public acceptability. This would result in a Prioritised Assessed List which, along with the Comprehensive Spending Review, would allow informed decisions to be taken on the transport interventions to include in a draft Delivery Plan.

It is considered that this section of the Public Consultation Document lacks detail and seems to 'tail-off' without a clear explanation of how interventions which progress through the Prioritisation Framework eventually make it to inclusion in the draft Delivery Plan.

The 'Making Choices' section of the Public Consultation Document states that this will be done within a secondary framework which can include things like equality, value for money, deliverability, acceptability and capital cost. It is our view that Public Consultation Document should be extended to provide a clear breakdown and explanation of the different elements of what it terms 'Transport Assessment' so it is clear if this is simply a continuation of the GOMMS/Web TAG type appraisal process that was included in the existing RTS document or a new approach.

Delivery Plan

As noted previously, the Public Consultation Document states that interventions which progress through the Policy Prioritisation Framework and subsequent 'Transport Assessment' will appear on a 'Prioritised Assessed List' which, along with the Comprehensive Spending Review, would allow informed decisions to be taken on the transport interventions to include in a 'Draft Delivery Plan'. The Department has stated, in the Public Consultation Meetings, that it is unlikely that funding will be available to develop revised area specific transport plans which were undertaken to implement the existing RTS (e.g. BMTP, SRTP and RSTN TP). It is likely that any new Delivery Plan will be developed on a regional basis.

In this context, the Council would seek to ensure that the proposals contained in the Belfast Masterplan are taken forward and included in any Regional Delivery Plan. It is considered that close engagement with the Council is vital when developing the Delivery Plan to ensure that the aspirations of the Belfast Masterplan are not jeopardised.

We would also note the Department's comments at the recent public consultations that any proposals which are taken through the policy prioritisation framework will require political buy-in and sign off from the Executive before being committed to inclusion in the Delivery Plan. The Council would seek to ensure that the major urban areas do not suffer from any

bias in terms of funding ratios which in recognition of the importance of transport to the economy should support the economic drivers for the region.

The Council would re-iterate the point that the role of Belfast as the key economic driver for the region should be supported to maximise the potential for sustainable economic growth based on the higher gross value added in the Masterplan area and other urban centres.