

3. To what extent do you agree with the Transport Strategy's vision?

To provide a sustainable, safe, accessible and effective transport system which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports economic growth.

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments in the box

While Cycling UK agrees with DfI's vision for transport, we are concerned that the strategy lacks the level of ambition necessary to achieve that vision.

4. To what extent do you agree with the reasons for change set out in the Strategy? [as a group, not separately]

- Traffic Congestion;
- Climate Change;
- Health and Wellbeing;
- Road Safety and
- Equality.

(Strongly agree, agree, strongly disagree, disagree)

Are there any other areas that are driving 'a need for change' in our transport network that the Transport Strategy should address? (open answer)

N/A

5. To what extent do you agree with Strategic Priority 1?

Transport is Resilient and Sustainable

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

We condone the central role of environmental sustainability within the transport strategy. However, the details within the sustainability section of the strategy suggest that the Department understands the fundamental issue of transport emissions and its solutions, but is not willing to take action at the scale and speed necessary to achieve net zero (see answer to Question 6).

6. Do you agree with the Strategy's approach to reducing the Carbon Impact of Transport?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

We welcome the increased recognition that net zero requires a substantial reduction in private car journeys. However, that recognition is not backed up with sufficient policies and action. For example, the strategy notes that the Climate Change Act requires DfI to spend 10% of the transport budget on active travel. Recent statements in infrastructure committees and answers to Assembly questions have revealed that the Department is engaging in substantial creative accounting to meet this target rather than actually spending the 10% figure on interventions which will encourage active travel. This kind of manoeuvring will never lead to net zero.

The transport strategy should be more ambitious with regard to mode shift. For example, paragraph 14 on page 23 lists a number of situations in which “journeys will always need to be undertaken by private vehicle”. While for some people, in some cases, this will be true, DfI should not absolve itself of the responsibility to reduce these cases. For example, the transport strategy says almost nothing about e-cycles, and in particular e-cargo-cycles, which are an excellent alternative to driving in many of these scenarios, such as working a trade or commuting in a rural area. The average NI journey length of 6 miles may be challenging for some people to complete on a standard pedal cycle, but very accessible on an e-cycle. The Department should encourage their use through incentives such as grants and free loans, in addition to rapidly expanding cycling infrastructure.

The Department’s three-pronged approach to transport decarbonisation includes the right components, but in the wrong priority order, with too much importance placed on electric vehicles (see answer to Question 13). Modal shift should be at the top of the agenda and receive significantly more investment in reflection of the sustainable transport hierarchy, which says active travel should be prioritised at the highest level, followed by public transport and finally private vehicles. DfI should publish its Transport Emissions Model to provide more transparency around how it made the decision to prioritise alternative fuels.

7. Integrated Transport and Land Use Planning has a key role to play in supporting our transport objectives. What can the Department do to promote more sustainable patterns of transport and travel? (open answer)

DfI is right in integrating Local Development Plans and Local Transport Plans. There must be a more explicit imperative for new LTPs to include mode shift targets and for LDPs to support new housing in places which are within walking or cycling distance of key services and public transport links. LDPs should also require developers to include active travel infrastructure in their plans.

8. Do you agree with the Vision and Validate approach to Transport Planning?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

Replacing the “predict and provide” approach with a vision and validate approach is a very good start in reversing car dominance. To make a difference, of course, that vision will need to be strong and unwavering in the face of opposition from parties which oppose traffic reduction. There are indications within the draft transport plan that the vision is neither sufficient nor backed with sufficient plans for action. For example, paragraph 38 on page 28 suggests that factors such as limited road space mean “the needs of vehicles will remain a key consideration in planning and design.” Limited road space is precisely why the use of private motor vehicles, which as the strategy itself acknowledges are a highly inefficient way of moving people, should be discouraged. Road reallocation and making driving a less convenient and attractive option by re-routing motor vehicle traffic will help people decide to travel in more efficient, sustainable ways. Again, focusing on the trips for which there is “no viable alternative” can serve as an unhelpful excuse to prevent the provision of those viable alternatives.

9. Do you have comments on the Place and Movement Framework? (open answer)

10. What do you consider is the best way to engage with people to encourage them to change their travel behaviours? (open answer)

There are numerous behaviour change models which can be applied to transport choices. COM-B, for example, states that people need the capability, opportunity, and motivation to change behaviour. Increasing capability could include cycling skill sessions, while opportunity could be provided through free or subsidised e-cycles. Motivation often includes a social dynamic, such as community cycle clubs, which provide participants with a sense of belonging and accountability, making sticking with a new behaviour more likely. Some local authorities have the knowledge and capacity to provide this support on their own, while others can partner with organisations such as Cycling UK to deliver behaviour change programming.

11. What are the main Travel Demand Management measures that the [Demand Management] framework should consider? (open answer)

If the Demand Management Framework follows the approach set in paragraph 49 of page 37, it will not lead to a significant change in travel behaviour. Making it easier to choose sustainable modes, as discussed in this section, is of course very important. However, experience elsewhere, such as Stevenage, has shown that even when other options become easier, people will continue to drive for most journeys because driving will continue to be the fastest and easiest option. Mode shift requires disincentives in addition to incentives. For example, while abundant bus, train, and underground options in London make public transport accessible, the city has simultaneously made car ownership and use very expensive and inconvenient, for example through the congestion charge and pedestrianisation. If Northern Ireland is serious about changing the fact that only 2% of journeys are made by public transport and only 1% cycled, choosing those options must not only become an easier choice; driving must become a much less attractive option (i.e. slower, more costly, and less pleasant).

12. The reallocation of road space in our urban areas is seen as a key measure to support the Department's Strategic Priorities. Do you agree with this approach?

(Strongly agree, agree, strongly disagree, disagree)

[No space to comment]

13. Do you agree with the Strategy's approach to the transition to zero and low emission fuels?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

Despite highlighting the importance of modal shift, the strategy's approach to decarbonisation prioritises switching fuels. This indicates a failure to look at transport strategy holistically: electric vehicles do not make our roads safer, improve public health, or free up valuable public space. [Evidence shows](#) that achieving climate targets is unlikely without a significant move away from motor vehicles – including electric vehicles. Additionally, recent [analysis](#) shows that increasing BEV ownership increases car trip demand, thus partially cancelling out their carbon benefits and reducing cycling and walking levels, with negative health consequences. It is good to see DfI considering disincentives for ICE car use, but this should be extended to all private car use. Implementing mode shift or traffic reduction target would be a good place to start. Researchers agree a minimum of 20% reduction in miles is necessary.

14. Do you have any other comments on the Resilient and Sustainable section of the Strategy? (open answer)

We welcome DfI's investment in new modelling tools and other data tools. However, the Department must commit to actually basing decisions on the outcomes of those models, and altering course on previous decisions if necessary. For example, the Active Travel Delivery Plan spread resources thinly without sufficient consideration of where those investments would have the greatest impact. DfI later invested in the development of a new NI propensity to cycle tool, which is a very positive step. However, the tool will likely suggest that active travel infrastructure should be more concentrated in areas where it will be more likely to achieve modal shift.

15. To what extent do you agree with Strategic Priority 2?

Transport supports connected and inclusive communities.

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

N/A

16. Do you agree with the Strategy's approach to creating an inclusive transport system?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

N/A

17. Do you agree with the Strategy's approach to Transport Integration?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

The transport integration section does not include any measures on better integrating cycling with other modes of transport. Because people can generally cycle longer distances than they can walk, cycling plays a big role in increasing access to public transport. DfI should include in this section measures such as public bike share schemes and secure cycle parking at stations, bike stowage on buses, and more stowage on trains. Integrated ticketing, which should include bike share schemes, is also helpful.

18. Do you agree that the maintenance and improvement of the Regional Strategic Transport network (road, interurban bus and rail) should remain a key priority for the Department?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

Maintenance of all transport networks is important, but if DfI is serious about net zero, the focus of RSTN investment needs to be on long-distance buses and rail. This could include new park and ride facilities, more subsidised bus and train fares, and more bus lanes. Investment in the Strategic Road Network doesn't help contribute to inclusivity – [data](#) consistently shows that how much someone travels is highly correlated with their income. Expensive projects which facilitate long-distance car travel therefore have much less of an impact on deprived communities and can disproportionately impact them in negative way. For example, low-income housing is more likely to be situated next to busy, highly polluted roads.

19. Do you agree with the Strategy's approach to Active Travel?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

Given the Strategy's welcome acknowledgements about the vast benefits of active travel and scale of the need for infrastructure, it does not sufficiently prioritise active travel. In particular, the Department must review and amend the spending it attributes to active travel to ensure that the 10% commitment in the Climate Change is actually met, rather than creatively accounted for (see answer to question 6). The Active Travel Delivery Plan released in 2024 is also problematic because it spreads insufficient resources too thinly without properly considering outcomes. The delivery plan must be reconsidered in light of the new NI propensity to cycle tool (see answer to question 14). Finally, the active travel section of the Strategy should also include plans on slower speed limits to reflect the fact that design guidance suggests 20mph speed limits are necessary on any street where there is no protected cycle lane and cycling is desired.

20. Do you agree with the Strategy's approach to Micro Mobility?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

N/A

21. Do you agree with the Strategy's approach to Motorbikes?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

We question the Strategy's assessment of the role of motorbikes within transport. While it is important to improve road safety for motorbike riders, who suffer the highest fatality rate of all road users, encouraging more motorcycling will not accomplish the Department's vision. Unlike active travel, motorcycling can cause significant air and noise pollution and does not significantly improve carbon emissions or congestion. Only electric motorcycles should be promoted.

22. Do you agree with the Strategy's approach to Bus and Coach?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

N/A

23. Do you agree with the Strategy's approach to the Rail Network?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

N/A

24. Do you agree with the Strategy's approach to Community Transport?

(Strongly agree, **agree**, strongly disagree, disagree)

Please provide comments if any.

N/A

25. Do you agree with the Strategy's approach to Private Operators?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

N/A

26. Do you agree with the Strategy's approach to Taxis?

(Strongly agree, agree, strongly disagree, **disagree**)

Please provide comments if any.

The Strategy overestimates the role of taxis in achieving its vision. This aligns with DfI's actions, such as recently deciding to allow taxis in bus lanes. The promotion of any mode must be clearly aligned with that mode's contribution to the reasons for change; in the case of taxis there is a lack of alignment.

27. Would you like to add any further comments on public and shared transport? (open answer)

The Strategy is missing an approach to shared car use, for example through car clubs, which will contribute to its goals of reducing private car use and achieving modal shift.

28. Do you agree with the Strategy's approach to the Road Network?

(Strongly agree, agree, strongly disagree, **disagree**)

Please provide comments if any.

The Strategy fails to justify why the focus of road development will be on the Strategic Road Network, and how this will accomplish DfI's strategic priorities. Prioritising the Strategic Road Network is inconsistent with the Department's decarbonisation, health, and inclusivity priorities.

29. Do you agree with the Strategy's approach to Parking?

(Strongly agree, agree, strongly disagree, **disagree**)

Please provide comments if any.

The Strategy could go further in disincentivising private car use through parking policy. For example, paragraph 167 on page 66 states that town and city centre parking facilities are necessary to “maintain economic vitality”. While some visitors will have to drive, the goal should be to provide alternative means of accessing city and town centres for the majority who can avail themselves of other modes. The idea that urban areas suffer economically following car restrictions such as pedestrianisation is a myth. Numerous research studies have shown that business owners consistently overestimate the proportion of their customers who arrive by car, and that profits – particularly for hospitality businesses – increase following car restrictions because they make a street more pleasant. Cyclists and pedestrians also spend more money and make more stops than drivers, so incentivising active travel makes economic sense. Devoting ample space for parking is not only a waste of limited space in urban areas, but also encourages people to drive. In addition to active travel infrastructure and public transport routes, sustainable travel to urban areas should be incentivised through park and ride facilities which make public transport more attractive than driving. Providing plenty of parking spaces within city and town centres and minimising any restrictions on driving stifles take up of park and ride facilities.

It is also very important for the Strategy to commit to further restrictions on pavement parking. Current restrictions, such as those in bus lanes, are extremely limited and make little difference to people who cannot walk or wheel on pavements because of parked vehicles. Pavement parking must be banned everywhere with limited exceptions, rather than the current reality that pavement parking is legal everywhere with limited exceptions.

Finally, the Strategy is unnecessarily disparaging of residents' parking schemes, with no justification given for their stated lack of suitability for most areas. Opposition from consultation respondents does not equate to lack of suitability. Residents' parking schemes can discourage excessive car ownership, which in turn reduces inconsiderate parking and opens space for other uses such as cycling facilities.

30. Do you agree with the Strategy's approach to Enforcement?

(Strongly agree, agree, strongly disagree, **disagree**)

Please provide comments if any.

The Transport Strategy echoes other road safety messaging by DfI when it says “knowing and applying the rules is a responsibility shared by all. Only collectively can we reduce road deaths and casualties occurring on our roads”. This kind of mentality – that all road users must contribute equally to road safety – is ignorant of differing capacity to harm and often

leads to victim blaming and dangerous driver behaviour around vulnerable road users. One of the new principles in the GB Highway Code, which DfI refuses to adopt, is the Hierarchy of Road Users, which explains that those who have the greatest capacity to harm others (via larger vehicles and faster speeds) have the highest responsibility over the safety of other road users. We strongly recommend that the NI Highway Code is urgently updated to adopt this principle, and enforcement resources should be directed primarily at those with the greatest ability to cause harm.

31. Do you have any other comments on the Supports Connected and Inclusive Communities section of the Strategy. (open answer)

N/A

32. To what extent do you agree with Strategic Priority 3?

Transport is Safe and Healthy.

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

N/A

33. Do you agree with the Strategy's approach to Road Safety?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

The Department should adopt a more ambitious vision zero target than 2050. The Mayor of London, for example, has adopted a goal of eliminating road deaths and serious injuries by 2041 – for a population five times bigger than that of NI. Additionally, DfI should follow other nations across the world in ceasing to use the word “accident”, which makes collisions sound inevitable.

To achieve vision zero, DfI needs to accelerate and expand the roll out of 20mph speed limits, given that all the speed limit considerations mentioned in the Strategy (road safety, character of the area, promotion of active travel, etc) support 20mph. The Department should not be swayed by consultation responses to 20mph proposals – governments do not allow the public to decide which speeds trains travel at, so why do laypeople get to override transport and road safety experts in the case of roads?

34. Do you agree with the Strategy's approach to Rail Safety?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

N/A

35. Do you agree with the Strategy's approach to Improving Air Quality?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

The Strategy must include more commitment to action, which could take the form of clean air zones, traffic reduction targets, more electric bus investment, etc.

36. Do you have any other comments on the Safe and Healthy section of the Strategy?

(open answer)

N/A

37. To what extent do you agree with Strategic Priority 4?

Transport supports green growth.

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

N/A

38. Do you agree with the Strategy's approach to Transport and the Green Economy?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

N/A

39. Do you agree with the Strategy's approach to Freight Movements and Economic Growth?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

Given the lack of detail or commitment to sustainability, the focus definitely seems to be on growth rather than on sustainability. For example, there are no plans to change the fact that almost all freight is moved via roads, which is clearly at odds with net zero. With 18.8% of carbon emissions coming from heavy duty trucks and buses and 8.2% from light duty trucks,

counting on far-off technological solutions for freight is a serious impediment to transport decarbonisation. In addition to rail, more freight could be transported by cargo cycles, particularly for last-mile delivery. The Strategy should incorporate a measure on encouraging cargo e-cycle uptake by both businesses and individuals.

40. Do you agree with the Strategy’s approach to Ports and Airports?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

N/A

41. Do you agree with the Strategy’s approach to Sustainable and Innovative Technologies?

(Strongly agree, agree, strongly disagree, disagree)

Please provide comments if any.

N/A

42. Do you have any other comments on the Supports Green Growth section of the Strategy? (open answer)

N/A

43. Do you have any comments on the Investment and Delivery section of the Strategy? (open answer)

We would support road user charging and congestion charging to raise funds for sustainable transport modes.

44. Do you have any comments on the Monitoring and Delivery section of the Strategy? (open answer)

N/A

45. Do you have any comments on the Equality Impact Assessment screening? (open answer)

N/A

46. Do you have any comments on the Rural Proof Assessment? (open answer)

N/A