

# Sustrans

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## Response to Belfast Local Development Plan

November 2018

## **About Sustrans**

Sustrans is the charity making it easier for people to walk and cycle. We are engineers and educators, experts and advocates. We connect people and places, create liveable neighbourhoods, transform the school run and deliver a happier, healthier commute. Sustrans works in partnership, bringing people together to find the right solutions. We make the case for walking and cycling by using robust evidence and showing what can be done. We are grounded in communities and believe that grassroots support combined with political leadership drives real change, fast.

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# Vision

We welcome the vision set out in the Plan (BLDP) for Belfast to be “a globally successful, smart regional city that is environmentally resilient with a vibrant economic and social heart”. We share this vision as a charity which works to make it easier for more people to walk and cycle. We believe that active travel and sustainable transport is vital to achieve the vision for Belfast in 2035. We believe that a city development plan that does not prioritise active travel will not succeed in making a liveable, attractive city for people to live, work and visit. **A city that is not walkable is not liveable.**

Within the introductory ‘Vision, Aims and Objectives’ Section of the BLDP under ‘Building a smart connected and resilient place’ (pg. 27) the following is stated: “The plan will encourage the expansion of green infrastructure networks for walking and cycling to encourage active travel and improve air quality and promote increased use of public transport whilst retaining suitable provision for cars.”

This statement, in particular its wording, is a complete juxtaposition and reflects further detailed content within the Plan. In particular:

- Encouraging people to travel more actively will not alone reduce air pollution. It may maintain it at current levels (too high), but the only way to reduce air pollution is to reduce the number of cars travelling within the city.
- The word ‘Retaining’ implies at least a continuity of provision in line with what is currently available. To satisfy your aims to improve air quality and increase active travel, road and parking space allocation for alternatives to cars must shift towards more sustainable modes.
- The term ‘suitable’ with reference to provision is highly subjective and open to detrimental interpretation in contradiction to what the city is trying to achieve with respect to active travel and air quality.

Considering the above, and given the Council’s clearly stated position that it has little control over roads provision, it would be prudent to exclude any reference to retention or provision for cars beyond that of the council’s public car parking obligations and any associated traffic impact they induce to the wider infrastructure network. In line with the Council’s own Car parking strategy and action plan, at very least the word ‘suitable’ should be replaced by the term ‘appropriate’ to align with Objective 1 of the Car parking strategy.

In terms of ‘Consistency tests’ we would question whether the BLDP has fully taken account of the Draft Programme for Government, in particular, **Indicator 25: ‘Increase the use of public transport and active travel’**. All planning must put this Indicator at the forefront of transport provision and actively discourage car use.

## 9.4 Transportation

Section 9.4.2 lists a number of problems caused by the ‘disproportionately high volume of travel by car to and within the city’. The first one mentioned is ‘driver frustration’ which is cited before road safety issues and pedestrian severance. Moving people and goods not cars should be at the centre of this strategy if we are ever to reduce car dependence in the city. The same paragraph ends with the environmental impact of congestion, including a weak reference to ‘associated emissions can result in poor air quality’. There is undisputed evidence that car emissions cause poor air quality and in fact lead to an estimated 40,000 deaths per year in the UK.

We welcome Policy Tran 1 which appears to embed provision of active travel for development proposals and that major employers will be required to provide shower and changing facilities.

We welcome Section 9.4.6 to support the delivery of the Department for Infrastructure’s Belfast Bicycle Network Plan in conjunction with the council’s Green and Blue Infrastructure Plan.

We support the measures set out in Section 9.4.7 particularly around locating secure, sheltered cycle parking closer to building entrances than car parking.

We welcome the promotion of multi-modal journeys described in Section 9.4.8 and believe there are opportunities to integrate public transport better with active travel, particularly with the new Belfast city centre Transport Hub, future Rapid Transit development and the west Belfast active travel hub.

## Car parking

We note the assertion in Section 9.4.31 ‘The priority is to ensure that car parking policies and provision do not incentivise the use of the car over the use of sustainable transport modes.’ However, it goes on to state that ‘car parking in suitable amounts and locations is vital for the city centre to function properly’. It adds that Belfast must compete as a shopping and leisure attraction with other towns and cities, and out-of-town retail developments. We are concerned that there is a contradiction in this. It almost provides a means to manoeuvre around the car parking policy.

As we stated in our response to the Council’s car parking strategy, we support all on-street parking spaces in the city centre core being controlled, either through parking regimes or residents parking schemes. Parking tariffs should be reviewed to reduce congestion in the city centre and encourage more people to use public transport.

There should also be provision for secure on-street cycle parking, in place of car parking spaces, particularly near cycle routes. This would improve the visibility of cycling and raise the status of cycling as a legitimate and desired mode of transport in the city.

We support the consideration of higher tariffs throughout the city centre to discourage all-day parking among office workers in this area. However, we believe this should be implemented alongside a marketing and behaviour change programme targeting employees.

## Inclusive Growth

There is strong evidence that bus users generate more income to city centres than car drivers. UK ‘Greener Journeys’ research found that the bus is a key mode of access to towns and city centres. The bus has the largest market share of retail and leisure trips to city centres at 33% (versus 30% for car, and 22% for walking and cycling).

Independent research carried out in Belfast by PwC showed that Metro customers are helping to boost retail sales in the city centre, with over 50% of shoppers using Metro services spending over £35 per visit.

A recent report by transport planners, Arup found that:

- up to 23% of car users could be encouraged to switch to buses if they were quicker and more reliable.
- The economic, social and environmental return for each £1 spent on bus infrastructure range from £2.00 to £3.80 for revenue expenditure and £4.20 and £8.10 for capital expenditure

Given the fact that ‘Inclusive Growth’ is at the centre of the BLDP, it is worth noting Arup’s conclusion that: “The most vulnerable in society are the most reliant on bus services, and as such services offer a way for many out of social isolation.”

It is also important to underline the fact that 36% of Belfast households don't have access to a car, and that a large proportion of residents here are reliant on public transport.

## Summary

As populations increasingly choose to live in urban settings, the problems associated with traffic and congestion will worsen. The Belfast Agenda and BLDP have goals to increase the number of residents in the city by 66,000 and create 46,000 additional jobs. In order to achieve this Belfast will need more people to use public transport and travel actively. **We are concerned that while the BLDP is supportive of active travel, the Council does not have the powers to make this happen. There needs to be an alignment between the BLDP agenda and transport plans by the Department for Infrastructure. The integration of public transport, active travel and landuse planning is essential. The Draft Programme for Government makes the case for better cross-departmental and partnership working. This is imperative for the BLDP to achieve the goals it has set out.**

A dedicated network of protected cycle lanes in Belfast and other urban areas, with priority junctions for active travel, is more urgent than ever. The Travel Survey for Northern Ireland reveals that many of the journeys we make are short: almost half of all the journeys we make in Belfast are less than two miles – far enough to walk, and certainly easy enough to cycle. Improving cycling infrastructure will enable people to commute to work or for everyday journeys by foot or bike, and allow children to walk or cycle to school, thus reducing rush hour congestion (as many as 1 in 4 cars are doing the school run).

A University of Glasgow five-year study of 250,000 UK commuters found that cycling to work can reduce the risk of developing and dying from cancer or heart disease. Published in the British Medical Journal in 2017, the study found that regular cycling cut the risk of death from any cause by 41%, the incidence of cancer by 45% and heart disease by 46%. Walking was also associated with a lower risk of cardiovascular disease.

As the population of Belfast continues to grow we need to find the most efficient way of enabling people to move around within the city. To do this we need more walking, cycling and public transport journeys and less trips by private motor vehicles. This can also help improve air quality, citizens' health and enable more attractive, liveable public spaces in the city.

We welcome the opportunity to expand upon and discuss these issues in more detail.

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