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

Belfast City Council agrees with the vision.

4. To what extent do you agree with the reasons for change set out in the Strategy?

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

Belfast City Council agrees that these appear to be legitimate and evidence-based reasons for a new approach to transport within the region. However, it is important to highlight the need for strategic alignment with local policy.

To be effective, the Transport Strategy 2035 must be explicitly aligned with the city's statutory and strategic frameworks, including:

- The Belfast Agenda, which prioritises city centre living, connectivity, resilience, and wellbeing, all of which depend on a shift to cleaner, people-focused transport.
- Belfast's Local Development Plan, a strategic document setting out policies for the city's physical development until 2035, with a vision of a globally successful, resilient, and vibrant city.
- The Net-Zero Carbon Roadmap for Belfast, which identifies a 66% reduction in transport emissions as essential to achieving 2050 targets carbon emissions.
- The Belfast City Climate Action Plan, which identifies sustainable mobility and active travel as critical interventions to achieve net-zero by 2050, in tandem with air quality improvements and reducing car dependency.
- Belfast City Centre Regeneration and Investment Strategy (BCCRIS), which supports reduced car dominance and increased access to city centre opportunities; and
- A Bolder Vision for Belfast is built on the following guiding principles:
 - promoting wellbeing for all.
 - > prioritising walking, cycling and public transport.
 - > creating lively, safe and green streets.
 - > removing barriers to movement between the city centre and surrounding communities.

Belfast City Council encourages the Department to treat these frameworks as core reference points for the implementation of the Transport Strategy and to embed them into delivery plans, investment priorities and spatial policy.

5. To what extent do you agree with Strategic Priority 1 (Transport is Resilient and Sustainable)?

Belfast City Council agrees with this priority. The Climate Change Act (NI) 2022 (CCA) sets the legal target of net zero greenhouse gas emissions (carbon emissions) by 2050, with challenging bridging targets for 2030 and 2040. After agriculture, domestic transport is the second largest emitting sector in NI, accounting for 18% of all emissions.

The growth of new electric vehicles will play a pivotal role in decarbonising the transport sector here, supported by a change in behaviours and a recognition that it will need to be implemented in a 'just' manner.

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

Belfast City Council agrees with the Strategy's approach and a combination of behaviour change and technological solutions is essential. Transitioning from Internal Combustion Engine (ICE) vehicles to low emission vehicles (LEVs) forms part of the solution but will take time as many ICE vehicles have a remaining productive period and the relatively high cost of LEVs limits uptake.

The council advocates the sustainable travel hierarchy framework and therefore supports the ambition to reduce the number of journeys taken and increase the relative proportion of journeys that are taken using public transport. Switching fuels is critical to our transport decarbonisation pathway. However, simply transitioning to alternative fuels is insufficient to deliver a sustainable transport system.

Accordingly, whilst there is an acknowledged need to transition to lower emissions fuels, and to zero emission vehicles, the Strategy should nevertheless seek to prioritise increased use of sustainable transport modes, and a transition away from reliance on the private car, in accordance with the sustainable travel hierarchy, in order to meet environmental, economic and social objectives related to emissions, congestion and car-dependency, and to contribute towards improving ambient air quality, with an emphasis on addressing emerging air pollutants of concern such as PM_{2.5}.

Under the Belfast Climate Action Plan, the council will aim to decarbonise business travel emissions. We will also review our Business Travel Policy to align with the sustainable travel hierarchy i.e. promotion of active travel, public transport, shared travel over private car use and air travel. Belfast must make a strategic shift away from the car as the predominant mode of transport, and this will in turn boost our climate resilience, and make our city a healthier, cleaner more enjoyable.

The 2019 Air Quality Expert Group's (AQEG) report to the Department for Environment, Food and Rural Affairs (Defra), "Non-Exhaust Emissions from Road Traffic" advises that non-exhaust particles arise from a range of vehicle-related sources, the main contributors being brake wear, tyre wear, road surface wear and resuspended road dust. Non-exhaust emissions from road traffic contribute to airborne concentrations of both fine and coarse particles and hence to PM_{2.5} and PM₁₀.

The UK Informative Inventory Report, "Emissions of Air Pollutants in the United Kingdom from 1990 to 2023" (March 2025) advises that emissions for the road transport sector accounted for 21% of PM_{2.5} emissions in 2023, and that the trend is influenced by a variety of factors. Regulation of vehicle emissions, such as through the introduction of Euro Standards on diesel vehicles has contributed to emissions reductions. However, the benefits have been countered by the growth in diesel vehicles, which despite contributing to fewer emissions for other pollutants (e.g. CO₂), contribute more particulate matter emissions per vehicle kilometre than petrol vehicles. More stringent emissions legislation now means that the latest Euro standard diesel vehicles are fitted with diesel particulate filters, which result in emissions of particulate

matter that are broadly comparable to petrol engines. However, further reductions in road transport emissions are now being restricted by increases in non-exhaust sources of particulate matter from vehicles, through tyre and brake wear and road abrasion. Emissions have grown with increases in traffic to the point where, overall, these now exceed particulate matter emissions from vehicle exhausts.

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?

Belfast City Council supports the retention of this established policy approach which seeks to ensure the integration of transport and land use planning. As such, this approach is identified as a key element in Belfast's Local Development Plan (LDP) as well as being evident in other council plans and strategies such as the Belfast City Centre Regeneration and Investment Strategy and A Bolder Vision. The effective implementation of this policy approach will play an important role in sustainably delivering the growth ambitions for the city as set out in the Belfast Agenda.

As referenced in section 23 of the strategy, it will be important that the Department continues to work together with councils' Planning services to ensure that planning policies, land use allocations and key site requirements contained within LDPs fully consider and are aligned with the transport policies, proposals and investment identified in the Department's Transport Plans. To this end it is crucial for Belfast that the Eastern Transport Plan and the Council's Local Policies Plan are prepared in parallel and that the Transport Plan doesn't delay the progress of the LDP.

In seeking to promote more sustainable patterns of transport and travel, the Department and Dfl Roads in particular, will continue to have an important role as a statutory consultee in the Development Management process providing their expertise in assessing the relevant travel elements of planning applications submitted to the Council, and making suggestions as to how proposed development can best align with sustainable travel objectives. This will include providing input into the preparation of Section 76 planning agreements.

The successful promotion of more sustainable patterns of transport and travel will also be influenced by the effective and timely delivery of infrastructure and other interventions identified in existing and future Department plans and strategies. Promotion should be easier for the Department if they are able to demonstrate that schemes and other measures are being delivered on schedule, providing viable travel options for users which are sustainable, safe, accessible and effective. One such example is the Belfast Cycling Network Delivery Plan 2022-31, where schemes can spend a significant amount of time in the Feasibility and Design stages. Belfast City Council remains keen to work with the Department on securing the delivery of planned schemes and other interventions.

It is also important to highlight the value of the Belfast Rapid Transit (BRT) - Glider network and service and the need to build upon this success to further extend the BRT network to North and South Belfast. There is willingness within Belfast City Council and with Belfast Region City Deal (BRCD) partners to work at pace with government partners to progress delivery of BRT Phase 2 (BRT2). BRT2 and other infrastructure developments planned within the BRCD area to promote sustainable transport and travel.

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

Given the issues associated with the previous 'predict & provide' approach it would appear reasonable for the Department to adopt an alternative approach which has the potential to identify and plan for more sustainable transport outcomes. The Council supports an approach which focuses on the movement of people and goods rather than vehicles but recognises that ultimately it is the delivery and implementation of the associated interventions and other measures which will lead to the Strategic Priorities for Transport being met.

9. Do you have comments on the Place and Movement Framework?

Belfast City Council broadly supports the concept a 'People and Movement Framework' (PMF) which can be used to describe and categorise roads and streets depending on the character of the area, how it prioritises place and movement accordingly, and identifies the types of transport measures that support the vision and objectives of the Transport Plan. Work to date on the Eastern Transport Plan has demonstrated to the council how the PMF could be applied, such as in the case of Local Centres which will designated through the LDP – the council is keen to see the outworkings of this process from a planning, placemaking and movement perspective.

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

Behavioural change must be informed by research into the current patterns and barriers with solutions developed to address the findings. These are likely to include a combination of providing adequate facilities and infrastructure, combined with relevant legislation and building social norms around travel choices to raise general awareness of the Sustainable Travel Hierarchy and the benefits that it can bring.

11. What are the main Travel Demand Management measures that the framework should consider?

No comment

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?

Belfast City Council strongly endorses the transformation of the civic spine linking Ulster University's city centre campus and Queen's University Belfast. This corridor (which includes Royal Avenue, Donegall Place, City Hall, Dublin Road and Botanic Avenue) is identified as a focal point for sustainable regeneration under *A Bolder Vision for Belfast* and reflects the city's ambition to become climate-resilient, people-centred and better connected to edge-of-city communities. To support this, the Transport Strategy should:

- Recognise the civic spine as a strategic movement and place corridor, prioritising pedestrians, cyclists, and public transport.
- Commit to reallocating road space for widened footways, segregated cycling, and improved green infrastructure.
- Support the delivery of integrated active travel links to surrounding communities, particularly in North, West and South Belfast.

- Embed inclusive design principles to ensure the space is accessible to all, regardless of age or ability.
- Invest in placemaking that enhances the cultural, civic, and economic vibrancy of the city core.

This corridor should be designated as a flagship transformation area, backed by cross-departmental funding and co-delivery mechanisms.

The council also strongly supports the principle, as set out in *A Bolder Vision for Belfast* that the inner ring road must be rebalanced to enable a modal shift toward more active and sustainable transport options. Currently, the inner ring road acts as a physical and psychological barrier to active travel and urban regeneration. It fragments the city, constrains access, and prioritises vehicle throughput at the expense of place quality and climate objectives. The Transport Strategy must explicitly commit to:

- Reallocating road space on the inner ring in favour of segregated cycleways, wider footpaths, and public transport priority lanes.
- Redesigning junctions to improve safe crossings for pedestrians and cyclists.
- Integrating the inner ring with a green active travel network that connects neighbourhoods and enables direct, safe access to the city centre.
- Creating opportunities for placemaking, greening and civic spaces along and across the ring road.
- Exploring traffic restraint tools such as filtered permeability, modal filters, and urban boulevard designs to reduce private vehicle dominance and severance.

Reimagining the inner ring is a necessary condition for delivering a connected, low-carbon and people-friendly city centre and should be identified as a strategic priority within the strategy.

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

The limited public charging infrastructure for electric vehicles across Northern Ireland is a significant barrier to wider uptake with the average provision per 100,000 population across the United Kingdom standing at 108, compared with Northern Ireland's provision at 36 (the lowest of all UK regions). Source: <a href="https://www.gov.uk/government/statistics/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-charging-infrastructure-statistics-january-2025/electric-vehicle-public-char

The council is supportive of ambitions to grow the LEV infrastructure and recognises the leadership role that councils can play. The exclusion of Northern Ireland councils from accessing resources made available to councils across the rest of the United Kingdom severely hampers their ability to lead by example.

The council welcomes the progress made through the Electric Vehicle Infrastructure Action Plan in 2022 and would welcome clarity on future strategic actions as well as setting targets for future uptake and tracking of both EV vehicle purchase and installation of publicly accessible charging.

To realise the ambitions within the council's Corporate Plan, A Bolder Vision and Climate Action Plan, the city centre must shift away from car dominance. The council strongly endorses

the transformation of the civic spine linking Ulster University's city centre campus and Queen's University Belfast. This corridor (which includes Royal Avenue, Donegall Place, City Hall, Dublin Road and Botanic Avenue) is identified as a focal point for sustainable regeneration under *A Bolder Vision for Belfast* and reflects the city's ambition to become climate-resilient, people-centred and better connected to edge-of-city communities. Currently, the inner ring road acts as a physical and psychological barrier to active travel and urban regeneration. It fragments the city, constrains access, and prioritises vehicle throughput at the expense of place quality and climate objectives.

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

Belfast City Council welcomes the Department's commitment to investing in the collection of evidence and robust data-led decision-making tools and notes the intention to use transport modelling tools as the default evidence base for many of their decision-making processes (Measure RS07). In the interest of transparency, it is anticipated that the council will have access to the suite of strategic transport modelling tools referred to in section 62 and that the Department (in its role as a statutory consultee) will continue to provide input to the evaluation of transport assessments submitted as part of a planning application.

15. To what extent do you agree with Strategic Priority 2 (Transport supports connected and inclusive communities)?

Belfast City Council welcomes the commitment to a transport system that facilitates sustainable and inclusive connections with a quality urban environment. The council agrees with the proposed direction; We very much welcome the major investment in Grand Central Station but note that Northern Ireland has experienced under investment for many years to support a proper connected transport system. We would be fully supportive of this strategic priority regarding better provision or design, of infrastructure which creates barriers for disabled people and others with reduced mobility.

The council regularly receives complaints from residents concerning cluttered footways, the absence of dropped kerbs, a lack of accessible crossing points or crossing points that are blocked by inconsiderate drivers. Complex and confusing streetscape can make every day journeys challenging for residents with disabilities, visual impairments or people with prams/ buggies.

To support the delivery of Connected and Inclusive communities the council urges the Department to strengthen the strategy's position on:

- Reducing general traffic access and through-movement within the city centre core.
- Commit to reallocating road space for widened footways, segregated cycling, and improved green infrastructure.
- Embed inclusive design principles to ensure the space is accessible to all, regardless
 of age or ability.
- Invest in placemaking that enhances the cultural, civic, and economic vibrancy of the city core.
- Supporting the development of a city centre parking reduction strategy, to enable modal shift.

- Introducing low-traffic neighbourhoods, demand management and traffic restraint measures in line with net-zero and public health objectives.
- Facilitating smarter, more sustainable freight and servicing models, including Mobility as a Service (MaaS) integrated transport and cargo storage centres and timed access windows.
- Expanding pedestrianised and car-free zones in areas of high footfall and civic value.
- Seek to engender active travel choices from an early age, for example through funding cycling proficiency training and cycling/scooting infrastructure in schools.

These interventions must be supported by clear legislative powers, delivery structures, and capital funding.

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

Whilst the council welcomes this refreshed cohesive approach, we note with some caution the principles of good design where both disabled people and non-disabled people can use space, transport and travel generally in the same way. There is a limited understanding of people's needs in the screening document, for people with or without a disability. There is very limited data on the different types of disability, where a person who is a wheelchair user will have very different needs compared to a blind person.

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

Belfast City Council agrees with the approach to Transport Integration but suggests it requires significant investment. Further development of Park and Ride facilities is an opportunity for the installation of electric vehicle charging points to build the very limited infrastructure within Northern Ireland and encourages a blend of modal shift with fuel shift. Further integration is required between cycle and sustainable transport modes such as buses and trains with the current provision being very limited.

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?

Belfast City Council is supportive of the fact that the strategy intends to take account of the NI Executive's commitments to City and Growth Deal transport projects.

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

Belfast City Council is supportive of the strategy's approach to Active Travel. It is important for the city to promote this concept, not only for the reduction of congestion and the subsequent pollution, but also for the health benefits of increased physical activity. Encouraging a shift to active travel will make the city a more pleasant place to live and traverse. It is necessary that the cycling network receives the required investment to encourage people to cycle within a safe segregated space.

The council welcomes that "education programmes and robust enforcement of traffic regulations" will complement the improvement of the networks and assist with compliance.

Furthermore, the council would emphasise the need for accelerated delivery and sustained investment, particularly within urban centres. To this end, clarity on the implementation timeframe is required. The Council also recommends that the strategy:

- Fully commits to implementing the Belfast Cycle Network Plan, with priority given to segregated routes, ensuring the delivery of safe routes and missing links.
- Provides dedicated, ring-fenced funding for walking and cycling infrastructure, including maintenance, monitoring, and engagement.
- Promotes bus priority corridors and supports the expansion of zero-emission fleets, in alignment with both city and regional climate goals.
- Ensures active travel infrastructure is delivered to universal design standards and integrated with public transport hubs, including Belfast Grand Central station.
- Recognises the importance of partnership with local authorities in planning, engaging and co-delivering schemes, as set out in our Corporate Plan.

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

No comment

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

No comment

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

No comment

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

Belfast City Council agrees with the approach to the Rail Network but suggests it requires significant investment.

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

Community transport is an important service for those who are isolated within our society or have difficulties in accessing transport, either public or private. The council would support any developments to ensure that "its future potential can be realised, funded, and resourced".

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

No comment

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

Belfast City Council notes that the strategy doesn't provide outputs, only measures which are quite vague. Therefore, it is unclear what improvements will be made to meet the needs of people with disabilities and their carers. There is no detail on accessible taxis that will be

available and whether there will be funding to support private companies to purchase accessible taxis. An action plan may provide more detail given the length of the delivery period.

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

Belfast City Council would again take this opportunity to highlight that public and shared transport requires significant investment.

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

Belfast City Council agrees with the strategy's approach to the Road Network but suggests it requires significant investment including the serious backlog of road potholes. The council welcomes any proposals that "improve road safety, resilience, decarbonising transport (particularly though modal shift) and placemaking". We would agree with the proposal to reduce reliance on private cars to help tackle congestion and improve air quality, especially within the city centre, where there is good access to public transport.

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

Belfast City Council welcomes any proposals that "improve road safety, resilience, decarbonising transport (particularly though modal shift) and placemaking". The council would agree with the proposal to reduce reliance on private cars to help tackle congestion and improve air quality, especially within the city centre, where there is good access to public transport. The Belfast City Centre Regeneration and Investment Strategy (BCCRIS) identified the need for a parking strategy and action plan to ensure appropriate provision and location of parking to support the vitality of the city centre.

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

Belfast City Council recognises the need to keep the public and road users safe on the network and would welcome the Department's continued work with all their stakeholders in keeping people safe, either through enforcement or increased education. Enforcement is also important to ensure compliance with the Highway code and other road traffic legislation to ensure proper use of the public roads and pathways network.

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

Belfast City Council notes that blocking or ICEing of electric vehicle charging points continues to increase as the infrastructure grows. Consideration should be given to appropriate solutions at a national as well as a local policy level.

The council welcome's the Department's commitment to improve accessibility and in particular the measure, 'The Department will ensure people with disabilities and additional mobility needs are reflected in the design and management of the transport system.' We would recommend that the Department engages with the Department for Communities on the forthcoming Disability Strategy, on the many different facets of public policy and how they connect to understand disabled people's lived experience, e.g. to get a job you need transport.

The draft strategy is a positive step in terms of addressing inequality, promoting inclusion and access.

Belfast City Council's Disability Advisory Panel have liaised with the Inclusive Mobility and Transport Advisory Committee (IMTAC) and are aware that similar accessibility issues are faced by other people with disabilities. We look forward to working in partnership with the Department to resolve these long-standing issues in Belfast.

The council welcomes any interventions that reduce the levels of poor parking or parking nuisance within residential areas. This would also assist Council with delivering its services unhindered e.g. waste collection and other cleansing services. We would encourage the continued enforcement by the PSNI, for those causing a general obstruction on the networks.

32. To what extent do you agree with Strategic Priority 3 (Transport is Safe and Healthy)?

Belfast City Council agrees in principle.

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

No comment

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

No comment

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

Poor air quality is the largest environmental risk to public health in the United Kingdom, as long-term exposure to air pollution can cause chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy. Northern Ireland has 17 Air Quality Management Areas (AQMAs) declared because of NO₂ emissions from road traffic. These primarily occur in urban areas experiencing high volumes of traffic. (four of which are located within the Belfast City Council area).

Particulate matter (PM₁₀ and PM_{2.5}) arises as a by-product of the combustion of petrol and diesel and from physical processes, such as brake pad, tyre, and road surface wear. Although no objectives for particulate matter are exceeded in Northern Ireland, there is still a need to address what levels there are, as there is 'no safe level'. For AQMAs that have transport related issues, the Department works with local councils as they prepare and implement their Air Quality Action Plans (AQAPs). These AQAPs contain actions that the Department, alongside other 'Competent Authorities' are taking to address air quality issues. Part III of the Environment (Northern Ireland) Order 2002 places a duty on councils to periodically review and assess ambient air quality within their districts in order to determine whether air quality standards and objectives for the protection of human health are being achieved or are likely to be achieved within the relevant time period.

Where, as a result of an air quality review and assessment, it appears that air quality standards or objectives are not being achieved or are unlikely to be achieved within the relevant period,

the district council is required to designate, by order, all or any part of its district as an Air Quality Management Area (AQMA). The council is subsequently required to prepare an Air Quality Action Plan (AQAP) for exercise by the council, in pursuit of the achievement of air quality standards and objectives within the AQMA. Competent or relevant authorities, as defined within the Air Quality Regulations (Northern Ireland) 2003, are additionally required to provide details of actions that they will undertake in order to comply with, or in pursuit of the achievement of air quality standards and objectives.

Belfast City Council has designated four AQMAs across the city for exceedances of annual and 1-hour mean objectives for nitrogen dioxide, associated principally with road transport emissions. The current Belfast City AQAP (2021-2026) draws therefore on those actions substantially provided by the Department and by other competent or relevant authorities and partner organisations involved in transport provision in order to improve ambient air quality within our AQMAs, and across Belfast generally, over the period 2021-2026. The current AQAP can be viewed at:

https://www.belfastcity.gov.uk/documents/belfast-city-air-quality-action-plan-2021-2026

- 36. Do you have any other comments on the Safe and Healthy section of the Strategy? No comment
- 37. To what extent do you agree with Strategic Priority 4 (Transport supports green growth)?

No comment

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

Consideration and development of future rail freight options would be welcome to reduce roads related travel and reduce the associated carbon emissions.

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

No comment

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

No comment

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

No comment

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

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

Finally, the Council calls for greater clarity in the final strategy regarding governance, delivery, and funding. We note that financing remains unclear and many vital initiatives, especially public transport, EV infrastructure, and cycling networks lack detailed funding commitments. It is imperative that the strategy has independent oversight and clearly identified Key Performance Indicators to ensure accountability and timely delivery. The success of the strategy will depend on the ability of the Department to work in genuine partnership with councils, regional stakeholders and communities.

Belfast City Council is keen to ensure that strategic transport network upgrades also contribute to improved placemaking, and we have articulated this position particularly in respect of the proposed York Street Interchange scheme with a view to creating thriving liveable places and communities, responding to the climate emergency and simultaneously connecting people and opportunities. The council recommends:

- The establishment of a city-region level delivery board with representation from local government.
- A dedicated funding programme for urban sustainable mobility aligned to the Local Development Plan and community priorities.
- Annual reporting mechanisms and Key Performance Indicators aligned with net-zero, health, and inclusivity outcomes.

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

Belfast City Council recommends an annual reporting mechanisms and Key Performance Indicators aligned with net-zero, health, and inclusivity outcomes. The Delivery Plan needs to include measurable targets for Public Transport to shape enjoyable, safe & people-focused places. In this regard more ambition is required from the Department in the delivery. Furthermore, there needs to be clarity and detail on the 10% Active Travel funding to prioritise and sequence areas for development as an enabler for progressing placemaking.

45. Do you have any comments on the Equality Impact Assessment screening?

Belfast City Council welcomes the clear commitment to improving infrastructure and developing its role in removing barriers and creating opportunities for interaction and engagement between groups. The monitoring and evaluation framework will need to be central to all of the actions delivered under the Transport Strategy to realise the intention that 'Inclusive Transport' is part of the whole strategy and is not confined to any one section.

The screening provides key data that should steer the actions which will be developed and delivered if the rationale for not undertaking a EQIA is realised. Central to this will be the need for ongoing engagement with all disabled people to understand the many different needs, to understand the diverse needs of people with different types of disability.

46. Do you have any comments on the Rural Proof Assessment?

No comment