Response ID ANON-DZEH-XQBB-R

Introduction

1 Are you replying on behalf of an individual or organisation?

Organisation

Name of Organisation:
Chartered Institution of Highways & Transportation (CIHT)

2 What is your postcode?

postcode:
N1 7JE

Context

Vision

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

Strongly Agree

Please provide comments on the vision, if any.:

Suggest rephrasing to the following as this may be easier for the public to understand:

To provide an inclusive, sustainable, safe, accessible, effective and resilient transport system which serves the needs of urban and rural communities, and supports economic growth.

The Need for Change

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

Strongly Agree

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

CIHT welcome the focus in these areas.

On Climate Change for example, the CIHT work on CLIMATES had a recommendation as follows:

Prioritising climate action in national transport strategies. National transport strategies can be very helpful for driving change in support of sustainable transport. If done well, they explain what governments expect from the transport system and how they would like to achieve those goals. This provides industry and the professions with a stable, strategic framework within which they can invest and innovate to deliver.

In the report CIHT notes that Scotland and Wales have already produced strategies so the development of the Strategy in Northern Ireland is welcomed. See CIHT CLIMATES for more information: https://www.ciht.org.uk/knowledge-resource-centre/resources/policy-technical/climates/

In respect to equality, we welcome the acknowledgement that those who contribute least to the problem can feel the impacts the most. We agree that, although there have been significant improvements in the provision of accessible travel options, the reality is that for many people transport remains a major issue and barriers remain. This is reflected in our comments related to public and community transport, especially in respect to accessing services and facilities, particularly to access health services. Our comments also reflect the need to ensure a Just Transition to net zero.

Strategic Priorities

Resilient and Sustainable

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

Strongly Agree

Please provide comments if any. :

CIHT has undertaken work on resilience and would recommend that the Strategy considers the CIHT report: Delivering a resilient transport network (2024).

Key takeaways from the report:
1. Urgency to act now and be prepared: CIHT calls for adaptation and resilience to be made an immediate investment and policy priority across all governmental transport strategies. There is a risk of significant and expensive infrastructure failures if resilience measures are not recognised as key strategic objectives now. Extreme weather events are happening with increased frequency and intensity – it is imperative that we act now to mitigate the risk of possible losses.
2. Funding for maintenance: CIHT calls for investment in maintenance of our existing highways and infrastructure to ensure the continued and efficient use of our transport network. Incrementally adapting infrastructure and proactively maintaining it are crucial for extreme weather resilience and meeting decarbonisation goals.
3. Mandatory assessments of the current and future resilience of the infrastructure: CIHT encourages the legislative road authorities of the UK to make it a statutory requirement for all transport asset owners to carry out transport resilience assessments. This will help to identify vulnerabilities in the network, prioritise remedial action and identify who should be responsible. This should also apply to neighbouring asset owners and utilities where risks and impacts are clearly inter-twined.
4. Building a nationwide leadership: CIHT encourages the legislative road authorities of the UK to provide coherent and consistent guidance to the sector on how to undertake risk assessments on resilience. There is a need to avoid different operators and asset owners developing their own internal assessments based on different assumptions, leading to non-transferable or non-sharable data.

Further information here: https://www.ciht.org.uk/news/new-ciht-report-delivering-a-resilient-transport-network/

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

Strongly Agree

Please provide comments if any.:

CIHT supports work on carbon reduction in the transport sector and would recommend the Strategy considers the CIHT work on this including A Transport Decarbonisation Pathway https://www.ciht.org.uk/knowledge-resource-centre/resources/a-transport-decarbonisation-pathway/

An element of this is an online training course on Transport Decarbonisation that would be useful to support the implement of the Strategy.

This accredited CIHT e-learning course explains why the global effort to mitigate the risk of dangerous climate change demands very significant changes to how transportation professionals plan, design, deliver, operate, maintain, and decommission transport systems.

Details here: Transport Decarbonisation -2 hours CPD | CIHT Learn Note this course can be purchased also.

These resources provide CIHT members with a structured Continuing Professional Development (CPD) framework to fulfil climate action related goals.

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?

Please provide comments if any.:

CIHT welcomes the inclusion of land use considerations in this strategy. Transport should be a fundamental consideration to land use planning and decision making. Ensuring new housing developments are built in areas where sustainable transport modes like walking, wheeling, cycling and buses are available to people as soon as they move in can prevent car use from being embedded into travel habits. Basing development locations in areas with access to rail services and interurban bus services can be a strong facilitator of sustainable connectivity, particularly in rural locations where residents may be expected to commute for employment. It is important that a vision for land use priorities which supports sustainable travel habits is clearly provided in local planning documents.

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

Strongly Agree

Please provide comments if any.:

CIHT is strongly in favour of the vision and validate approach to transport planning. CIHT research has frequently highlighted that 'Predict and provide' approaches to transport planning, which base provision for transport on predictions about future need, have often yielded car-centric environments. Wider uptake of the vision and validate approach (also referred to as vision-led or decide and provide transport planning), can support a shift to more sustainable travel patterns by empowering transport planners to decide what future travel behaviours should look like and base transport provisions on this vision. For more information, please see Better planning, better places, better transport details here: https://www.ciht.org.uk/knowledge-resource-centre/resources/better-planning-better-transport-better-places/

However, there is a strong value in the Strategy taking account of the Triple Access Planning approach. Triple access planning (TAP) incorporates a 'decide and provide' model, which is vision-led and access-focused rather than transport-focused and, because the future is notoriously hard to predict, it accommodates uncertainty.

This model considers not only physical mobility, such as the transportation system, but also spatial proximity (land-use planning) and digital connectivity (telecommunication systems). It considers a possible set of scenarios and puts in place measures that work well regardless of what the future holds.

We note that reference is made in paragraph 38 to the Sustainable Hierarchy of Transport users. It is regrettable that this is the only mention and indeed that a diagrammatic visualisation of the hierarchy is not reproduced in the draft Strategy. We also note that paragraph 258 refers to the withdrawal of several documents including 'Planning for the Future of Transport – Time for Change' which established the hierarchy clearly into policy. We would recommend that Transport Strategy 2035 - at the highest level of visioning transport policy - should very clearly set out and affirm an appropriate placed-based sustainable hierarchy of Transport users supporting this with diagrammatic visualisation.

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

Please provide comments if any.:

The CIHT promotes a Place and Movement framework, developed in conjunction with the Manual for Streets (MfS) guidelines, to balance the "place" (how a street functions for people and community life) and "movement" (how vehicles and other modes travel) functions of street design. This framework prioritizes creating accessible, safe, and high-quality public spaces for all users, rather than allowing vehicle movement to dominate, thereby improving quality of life, health, and well-being, especially in urban and rural environments outside of trunk roads. CIHT supports the inclusion of the framework within the strategy.

Resilient and Sustainable

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

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

We note that in reference to the Climate Change Act there is an acknowledgement that electric vehicles will play a pivotal role in decarbonising the transport sector and that this will need to be supported by a change in behaviours and a recognition that it will need to be implemented in a 'just' manner. This reference to "a 'just' manner" is very loose and we would expect to see the final strategy provide more clarity.

CIHT recommends an approach encompassing both incentivising and disincentivising measures when encouraging people to change their travel behaviours and opt for more sustainable transport choices. This may take the form of investigating provision for public transport, ensuring that new developments do not exclude people from sustainable travel options and exploring advertising and promotions. It is important that this is accompanied by measures such as a reduction in the availability of parking, where appropriate, to encourage people to opt for more sustainable modes. It is vital to recognise that behaviour change policies and interventions do not land on society on a level playing field, they interact with a complex network of existing inequalities.

For more information, please see https://www.ciht.org.uk/justtransition

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

Travel Demand:

The framework should consider Travel Demand Management which enables Governments and Councils to:
- Understand current and future pressures and constraints in the transport system, for example, over-crowded peak hour trains or areas with planned population growth, and then adding capacity by adapting assets, if required.
- Identify when and where there is spare capacity, for example, under-utilised off-peak bus services, and then create capacity by optimising networks or better utilise existing assets by influencing people to:
o use different modes, example, car pooling instead of driving to work alone;
o use different times, such as avoiding or reducing travel during peak times; or
o use different routes, for example using a 'preferred driving route' or avoiding congested roads; or
o reduce the need to travel altogether, for example, working at home just once a week.

The Framework will require a strong focus on stakeholder engagement. CIHT recommends observing a process of 'co-cultivation' to achieve this, referring to sustained and meaningful public engagement from the outset of the development process. For more information, please see https://www.ciht.org.uk/news/creating-a-public-realm-for-all/
We also recommend exploring areas such as Last Mile Delivery. CIHT has produced a briefing on Last Mile Delivery which provides advice to Local Authorities and other stakeholders on how to drive improvements to local logistics operations. This can help support local economic activity while tackling the negative impacts that can be generated by these vehicle movements. More information is available at: https://www.ciht.org.uk/lastmiledelivery
Some elements that would be worth noting include:
• Appoint a freight lead within the Local Authority with a remit to raise awareness and work across functional boundaries
• Talk to local freight & logistics operators and their clients to improve the authority's understanding of the "what and why" of deliveries for different types of organisations. This will also help authorities understand how their existing kerbside regulation and historic planning conditions are shaping last mile delivery practices.
• Establish guiding principles for planning and development control decisions. Bear in mind your opportunities will vary considerably between new greenfield developments and efforts to retrofit the existing built environment. Specific policies for greenfield could include ensuring developers to treat Last Mile Delivery as another utility alongside power, water, internet and waste disposal by making credible Delivery and Servicing Plans a planning condition. In existing areas, creating Area Delivery Plans can be a focus for generating the data needed to make interventions and trade-offs in the existing built environment. They can also make the case for new development

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?

Agree

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

Agree

Please provide comments if any.:

CIHT welcomes the efforts to move to zero emission vehicles, recognising the impact that EVs will have in lowering emissions. While the NI government encourages people to shift and phase out Internal Combustion Engines (ICE), there needs to be a transition phase for those who will not be able to upgrade their vehicles to EVs immediately and will still rely for years to come on their current ICE vehicle or buy second hand ICE vehicles.

An increase in the uptake of EVs is directly linked to buyers' confidence that there is a widespread, affordable and accessible charging infrastructure across the country. In a way this is the prerequisite to make the shift work. Especially for people living in rural areas or outside big centres, who will not consider purchasing an EV unless they know they can rely on the charging infrastructure available.

CIHT notes that zero and low emission fuels vehicles may increase willingness to drive, both for cost and 'false virtue' reasons (demonstrating green credentials). Electricity is still carbon generating and there is carbon generated in the production of zero and low emission fuelled vehicles. As such, a place-based sustainable transport hierarchy must be the framework used when supporting the transition to zero and low emission fuels vehicles.

Please also note our earlier and following comments on a Just Transition to net zero.

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

Please provide comments if any.:

CIHT welcomes the Strategy's consideration of resilience both from a maintenance point and for new infrastructure. This seems comprehensive for a Strategy which is a high level. Further information from CIHT that would be helpful for more actions on delivering the strategy are, given in the response to Q5 and in CIHT report on Resilience: Delivering a resilient transport network maintaining - https://www.ciht.org.uk/knowledge-resource-centre/resources/delivering-a-resilient-transport-network

The draft Strategy notes "Prolonged underinvestment in maintenance has weakened the inherent resilience of the network and left it more exposed to problems that cannot always be fixed promptly and often require more extensive and costly interventions when they fail." We believe this is very much an understatement relating to circumstances persisting for over 40 years. Since the 1970's there have been external reviews highlighting the impact of underinvestment and the economic impact of this manifests itself, not just in the maintenance requirements of the network, but in the maintenance and running costs of vehicles using the network.

Supports Connected and Inclusive Communities

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

Strongly Agree

Please provide comments if any.:

CIHT welcomes and would recommend that to support the Strategy implementation that CIHT's Policy Brief Ensuring a Just Transition to Net Zero is used. This briefing highlights the challenges that UK's transport professionals face in considering fairness and justice when planning projects aimed at reducing carbon emissions in travel and can be found at https://www.ciht.org.uk/knowledge-resource-centre/resources/policy-technical/ensuring-a-just-transition-to-net-zero-transport-policy-brief/

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

Agree

Please provide comments if any.:

Paragraph 91 - Ensuring that places and travel are "accessible and inclusive for as many people as possible" does not seem to be very visionary and should be "accessible and inclusive for all"

Paragraph 92 – It is more correct/accurate to say "... and spaces create barriers..." than "... and spaces can create barriers..."

Paragraph 93 –should read "...engage with Translink and others about improving accessibility
on services and at stations and stops ..." instead of "The Department continues to engage with Translink about improving accessibility on services and at stations and stops. ".

Paragraph 96 – should use co-cultivation for engagement. Co-cultivation means is meaningful engagement and representation from the outset and design through construction, operation, monitoring, and evaluation (rather than just consultation on an almost-completed scheme). This serves as a useful approach when thinking about how and when to include people whose perspectives are too often ignored. For more information on this please see the CIHT report (2024) Creating a public realm for all - https://www.ciht.org.uk/knowledge-resource-centre/resources/policy-technical/creating-a-public-realm-for-all/

Paragraphs 101 to 105 – Violence Against Women and Girls (VAWG) should be expanded to include all protected characteristics who also suffer from similar problems e.g. disabled people and LGBTQIA+

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

Agree

Please provide comments if any.:

A major determinant of car use is car ownership. Car subscription clubs and car sharing are alternatives to car ownerships. A forecasted shift away from car 'ownership' to 'usership' provides an opportunity to overcome barriers to active travel as users can consider a range of transport choices (including car use) instead of defaulting to car use, particularly in urban areas. Note: private car ownership might still be the main option for people in rural areas and for people with disabilities.

The transport system increasingly needs to integrate with the energy system. With the move to electric vehicles, there needs to be charging infrastructure for car club vehicles as well as for those without off-road allocated parking.

CIHT welcomes the support a shift to car 'usership' through the provision of shared mobility schemes that consider car sharing, car clubs (short-term access to vehicles for trips within a defined area) and ride hailing and welcome the details of this in the section on Transport Integration in the Strategy. Subscription car clubs are widespread across Ireland, particularly in Dublin.

CIHT would recommend the inclusion of Micro Mobility to the section on Transport Integration. When properly managed, Micro Mobility vehicles present an opportunity to reduce inactivity, create an integrated transport system and create a greener transport network. See the response to question 20 for further details from CIHT on what to consider for Micro Mobility to be effective.

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

Please provide comments if any.:

Local roads form the backbone of the UK's transport infrastructure – making up 99% of the network and carrying two-thirds of all motor traffic. Yet they remain underfunded, with a growing maintenance backlog now estimated at £17 billion.

In CIHT's report 'Unlocking the benefits of long-term funding for local roads' published July 2025 CIHT proposed a five-year funding model for local authority highway maintenance, aligned with the successful approaches used for the strategic road network and the rail sector. The report recommended that in advance of the autumn budget 2025 the Department for Transport (DfT) to work with HM Treasury and Ministry of Housing, Communities & Local Government (MHCLG) and devolved administrations to establish a five-year funding settlement for local roads.

Research commissioned by the Department for Transport (DfT) from global consultancy AtkinsRéalis shows that local highways maintenance offers a strong return on investment, delivering socio-economic benefits of over £5 for every £1 spent.

CIHT in the report had three key recommendations:

1. In advance of the autumn budget 2025 the Department for Transport (DfT) to work with HM Treasury and Ministry of Housing, Communities & Local Government (MHCLG) and devolved administrations to establish a five-year funding settlement for local roads.

2. Treasury to prioritise funding for maintenance and renewals of the existing transport infrastructure before committing to building new ones. Specifically, CIHT calls for addressing the backlog in transport maintenance that is critical to ensure resilience and reliability.

3. DfT and devolved administrations to enable local authorities to maximise the benefits of long-term funding through providing:
• Targeted support and capacity building.
• Incentivised delivery and accountability.
• Procurement guidance and efficiency reinvestment.
• Data-driven funding allocation.
• Leveraging of devolution and strategic authorities.

Further information on the report available here:
https://www.ciht.org.uk/news/unlocking-the-benefits-of-longer-term-funding-for-local-roads-report-launched-by-ciht/

We recommend that the Department review the report "Review of the Structural Maintenance Funding Requirements for DfI Roads" by Jim Barton, published in 2019. This report highlighted how funding challenges had impacted road condition in Northern Ireland. Further information here: https://www.infrastructure-ni.gov.uk/publications/review-structural-maintenance-funding-requirements-dfi-roads

The Snaith Review of Northern Ireland's Roads also highlighted funding issues that the Strategy should take account of. Further information here: https://www.niassembly.gov.uk/globalassets/Documents/RaISe/Publications/2011/Regional-Development/DeptStrucMain.pdf

We also note the economic cost to industry through vehicle maintenance costs and delays.

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

Strongly Agree

Please provide comments if any.:

CIHT welcomes the Strategy's approach to Active Travel and supports the Strategy's focus on developing Active Travel as an accessible, attractive and safe transport choice for shorter everyday journeys. In our recently published policy brief 'Making the Case for Investment in Active Travel Policy Brief' [available at: https://www.ciht.org.uk/knowledge-resource-centre/resources/policy-technical/making-the-case-for-investment-in-active-travel-policy-brief/] , we highlight the excellent value for money offered by investment in Active Travel schemes.
CIHT supports the Strategy's focus on infrastructure maintenance and recommends that carriageway condition is not overlooked, as poorly maintained roads have a severe impact on people, especially when travelling via sustainable transport modes such as walking, wheeling and cycling. For more information about the importance of network maintenance, please see 'Potholes and poorly maintained footways: The cost to the NHS' available at: https://www.ciht.org.uk/news/ciht-launches-new-article-potholes-and-poorly-maintained-footways-the-cost-to-the-nhs/

CIHT advocates for all costs and impacts to be included in appraisal e.g. mortality and morbidity costs of physical inactivity – as these are largely ignored by conventional planning and monetising of benefits when prioritising and choosing schemes.

Supports Connected and Inclusive Communities

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

Agree

Please provide comments if any.:

CIHT supports the strategy's considered approach to Micro Mobility. When properly managed, Micro Mobility vehicles present an opportunity to reduce inactivity, create an integrated transport system and create a greener transport network. However, Micro Mobility schemes do present a risk of obstructive parking and anti-social behaviour, risks that pose a particularly significant risk to some people such as visually impaired pedestrians.

CIHT welcomes the Strategy's commitment to broad stakeholder engagement when regarding the regarding the future role of Micro Mobility as part of the transport system. We recommend considering additional risks such as users of shared Micro Mobility schemes being infrequent users and less confident/ aware of say cycling in busy traffic. Many schemes do not provide safety equipment, such as helmets and hi-vis clothing. Some users travel at inappropriate speeds for the environments they are in and can cause collisions.

Without enforcement, micromobility poses a major safety issue

Paragraph 129 – Add – E-bikes cannot be used on public footways in Northern Ireland.

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

Agree

Please provide comments if any.:

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

Agree

Please provide comments if any.:

In a very car dependent environment such as Northern Ireland, the only viable alternative of modal shift to public transport is the bus. It would have been helpful for the Strategy to provide more details on the DfI's approach to bus. It is difficult to comment on the Strategy's approach to Coach as it is barely mentioned in the strategy.

CIHT believes all public transport services should be fully accessible. We commend the Department and Translink on current progress towards making the bus and rail network fully accessible. We recognise that there is still work to be done but recent developments with low floor buses for urban services and some rural services is welcome. We believe the strategy should commit to having all public bus services delivered with low floor vehicles to accommodate wheelchairs. While most public bus services are provided by Translink there are other providers in the market. These providers should also be required to provide low floor wheelchair accessible vehicles on public transport routes.

Measure CC08 should be strengthened removing the work 'look to' from the current wording.

Measure CC08 currently states: "The Department will look to develop and support a public transport system which provides an attractive and accessible alternative to the car, with provision of services prioritised and focussed on where they will deliver the largest impact in terms of modal shift."

Measure CC08 should be strengthened to read: "The Department will develop and support a public transport system which provides an attractive and accessible alternative to the car, with provision of services prioritised and focussed on where they will deliver the largest impact in terms of modal shift "

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

Agree

Please provide comments if any.:

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

Agree

Please provide comments if any.:

It would have been useful to underpin the commitment to Community Transport with guaranteed funding.

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

Agree

Please provide comments if any.:

Where public transport services are operated by licenced Private Operators, they should provide those services with low floor wheelchair accessible vehicles complying to Public Service Vehicles Accessibility (PSVAR) Regulations

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

Agree

Please provide comments if any.:

The strategy should also recognise the important role that taxis can play for disabled people and people living in urban areas with limited access to private cars or public transport, and the need to develop the wheelchair accessible fleet.

It would have been helpful to know how the Strategy will ensure the decarbonisation of the taxi fleet.

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

Please provide comments if any.:

There is a need for the Strategy to reiterate the reliance on public transport by the most vulnerable, e.g. disabled, older and socially isolated: as such this needs to be viewed as an essential rather than a discretionary service and making public transport and shared transport, such as taxis, accessible should be a very high priority for the strategy.

Supports Connected and Inclusive Communities

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

Agree

Please provide comments if any.:

CIHT note the Department will publish a new road maintenance strategy which is welcomed. CIHT – as noted above – highlight the need for longer-term funding certainty, so as to enable better planning for the delivery of road maintenance.

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

Agree

Please provide comments if any.:

It would be useful if the Department for Infrastructure Northern Ireland could provide a roadmap to how pavement parking will be banned over time. With the aim of DfI introducing legislation to deal more effectively with pavement parking - particularly in areas where this is leading to footways being obstructed

CIHT recommends a vision-led approach to transport planning rather than a predict-and-provide approach. It is generally accepted that pavements are for pedestrians and the carriageway is for motorised traffic. Effective footway widths are reduced by obstructions such as wheelie bins, overgrown vegetation, street furniture, obstructions due to streetworks and vehicles parking with one or more wheels on the pavement. Moreover, parking of vehicles, particular heavy vehicles on footways that are not generally designed for vehicular traffic, risks damaging footways leading to defects that present a safety risk for pedestrians and reducing the life of the asset leading to additional costs for highway authorities. However, it is clear that in some areas, the volume of vehicles trying to park on the carriageway means that they are unable to do so without obstructing motorised traffic. This is particularly problematic for large emergency vehicles such as fire engines and ambulances. Solutions to this problem include:

A) Enabling modal shift to public transport, walking and cycling so that fewer cars are required to be parked
B) Changing traffic management of the area so that narrow two-way roads become one-way for motorised traffic (two-way cycling should be retained

where possible)
C) Removing the ability to park on one or both sides of the road, either physically by barriers or through parking enforcement
D) Reducing large footway widths (where possible) and increasing carriageway widths whilst adhering to the guidance on footway width set out in the DfT's Inclusive Mobility document
E) Banning parking on the footway via traffic management orders to enable enforcement (the police can already enforce against any vehicle obstructing the footway but rarely do). Any ban on footway parking should be coupled with sufficient enforcement to deter motorists.

Walking is the most popular mode for the shortest trips so this issue does need to be addressed with some sense of urgency. However, all of the measures above will take time to implement and transport authorities do not have the staff or funds to carry out the work involved to make such changes. Good progress has been made in Scotland with legislation available to local authorities to ban footway parking. However, if a ban on parking on the footway is to be extended outside Greater London and Scotland and CIHT believes that it should, it must be done at a pace at which local authorities and the Department for Infrastructure Northern Ireland can manage the work (and traffic/ parking displacement) and government can fund the work. In practical terms, this will not be possible to do overnight.

Taking a pragmatic approach, in the short term CIHT recommend the following:

• empower DfI to ban and pursue enforcement against observed parking on the footway (and enforce the ban under civil enforcement powers) if they wish, e.g. by virtue of dedicated signage on a road or zonal basis without going through the full traffic regulation order process (although consultation with the local community is recommended to still be a requirement).
• require DfI to consult on known locations of regular parking on the footway and their intentions of how (and when) they plan to deal with it - this would enable local communities and the emergency services to provide their views at an early stage. This consultation should involve the community at every stage in the process, i.e. co-cultivation, as recommended by the CIHT report Creating a Public Realm for All (see response to Q11 for more information).

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

Agree

Please provide comments if any.:

Enforcement coupled with PR/advertising campaigns is required to stimulate, promote and regulate public behaviour. This section of the strategy is closely linked to the following section on Road Safety and investment is required across both aspects.

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

Please provide comments if any.:

Paragraph 91 – suggest amending from: 'A fundamental principle of good design is ensuring that places and travel are accessible and inclusive for as many people as possible' to 'A fundamental principle of good design is ensuring that places and travel are accessible and inclusive for everyone.'

Paragraph 96 - suggest amending from: 'Proactive engagement is also key to the Department meeting its statutory obligations around the promotion of equality and good relations.' To 'Proactive engagement through co-cultivation is also key to the Department meeting its statutory obligations around the promotion of equality and good relations.' [see Q11 response for further details].

Is Safe and Healthy

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

Strongly Agree

Please provide comments if any.:

We strongly agree with this strategic priority, which aligns with one of the key asks of our 2024 manifesto, A Transport Network Fit for All Our Futures [available at: https://www.ciht.org.uk/media/c00dpivg/ciht-transport-fit-for-our-future-report.pdf]. Everyone should be able to travel safely and to feel safe while travelling. We welcome the commitment to introduce more 20mph speed limits in appropriate locations. Evidence-based decision making is essential to improving road safety outcomes.

CIHT would recommend that the Strategy does not use the word accidents when it comes to road safety and instead should use the word collisions. As such, CIHT would recommend that the Strategy amends the wording for the Department's target to the following: "that by 2050 fatal collisions should no longer occur on its roads".

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

Agree

Please provide comments if any.:

We support the Safe Systems approach adopted in the Road Safety Strategy and welcome the inclusion of targets. It is important that relevant authorities have the funds to share and implement best practice in responding to those targets.

We emphasise the importance of recognising the highway network as a place of work. Those who work on the highway network have the right to do so in as safe an environment as possible and to feel safe and unthreatened while working. We recommend that governments should work with the wider sector to better understand and address this, including public awareness of the importance of road worker safety.

We would also like to highlight that workers – without the right training or support - can be a threat to users (e.g. badly signed roadworks; tired occupational drivers etc). CIHT see training as being vitally important for improving safety. As an example, CIHT Learn (CIHT's online digital learning platform) has the course Supervisor Skills Level 1 - Safety Systems. The course aim is to introduce the supervisor to the safe systems of work that are required to ensure the safe, legal and compliant running of any good construction site.

Road casualty statistics together with the published enforcement statistics indicate that there is the need for a step change in the enforcement of road safety related issues.

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

Agree

Please provide comments if any.:

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

Agree

Please provide comments if any.:

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

Please provide comments if any.:

Supports Green Growth

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

Agree

Please provide comments if any.:

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

Agree

Please provide comments if any.:

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

Agree

Please provide comments if any.:

We also recommend exploring as the role local authorities have in Last Mile Delivery. More information is available at: https://www.ciht.org.uk/lastmiledelivery. This briefing provides advice to Local Authorities and other stakeholders on how to drive improvements to local logistics operations. This can help support local economic activity while tackling the negative impacts that can be generated by these vehicle movements.

Some elements that would be worth noting include:

• Appoint a freight lead within the Local Authority with a remit to raise awareness and work across functional boundaries
• Talk to local freight & logistics operators and their clients to improve the authority's understanding of the "what and why" of deliveries for different types of organisations. This will also help authorities understand how their existing kerbside regulation and historic planning conditions are shaping last mile delivery practices.
• Establish guiding principles for planning and development control decisions. Bear in mind your opportunities will vary considerably between new greenfield developments and efforts to retrofit the existing built environment. Specific policies for greenfield could include ensuring developers to treat Last Mile Delivery as another utility alongside power, water, internet and waste disposal by making credible Delivery and Servicing Plans a planning condition. In existing areas, creating Area Delivery Plans can be a focus for generating the data needed to make interventions and trade-offs in the existing built environment. They can also make the case for new development

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

Agree

Please provide comments if any.:

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

Agree

Please provide comments if any.:

It would be useful to know how Artificial Intelligence will be used. CIHT would recommend reviewing the CIHT report in this area: The role of data and artificial intelligence in achieving transport decarbonisation (2023).

There are many benefits AI can bring to the highways and transportation industry, especially when it comes to improving safety, providing more insightful transport planning, and efficient asset management, as well as improving the way the public experiences transport systems.
When it comes to decarbonisation, there are already examples of data and AI being used to:
• Accelerate modal shift to public transport and active travel by creating reliable databases on sustainable transport use; optimising traffic flow in favour of active travel and public transport; and monitoring the condition of active travel infrastructure.
• Decarbonise road transport and how we get our goods by aiding site selection of public electric vehicle (EV) chargepoints; managing grid capacity for EV charging; and reducing congestion, improving traffic flow, and improving road safety to avoid traffic incidents.
• Delivering and maintaining low-carbon infrastructure by predicting asset life cycles; analysing the integrity of existing assets; and recommending low-carbon infrastructure.

However, there are also barriers we must overcome if AI is to be widely adopted in our industry, including:
• Lack of skills and understanding, especially when it comes to people who specialise in data/AI and possess transportation sector knowledge.
• Funding and investment – although some schemes have been set up to encourage AI innovations, more support needs to be offered to the public sector, for whom investing in new technologies can be expensive and risky.
• Open data standards are needed to ensure that the way the transport industry (and all industries in the UK) collects and stores data is standardised, which will make data sharing easier and more valuable.
• AI strategies and policies must be developed that provide leadership and guidance to the highways and transportation sector, so that AI can be confidently and ethically adopted.

Report available at:
https://www.ciht.org.uk/knowledge-resource-centre/resources/the-role-of-data-and-artificial-intelligence-in-achieving-transport-decarbonisation/

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

Please provide comments if any.:

Monitoring and Investment

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

Please provide comments if any.:

The Investment and Delivery section of the Strategy highlights the challenging financial position for maintaining the road network. CIHT's report 'Unlocking the benefits of long-term funding for local roads', which is available at:
https://www.ciht.org.uk/news/unlocking-the-benefits-of-longer-term-funding-for-local-roads-report-launched-by-ciht/
highlights how longer-term funding certainty can deliver improvements in the efficient delivery of road maintenance.

We recommend that the Department review the report "Review of the Structural Maintenance Funding Requirements for DfI Roads" by Jim Barton, published in 2019. This report highlighted how funding challenges had impacted road condition in Northern Ireland. Further information here:
https://www.infrastructure-ni.gov.uk/publications/review-structural-maintenance-funding-requirements-dfi-roads

The Snaith Review of Northern Ireland's Roads also highlighted funding issues that the Strategy should take account of. Further information here:
https://www.niassembly.gov.uk/globalassets/Documents/RaISe/Publications/2011/Regional-Development/DeptStrucMain.pdf

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

Please provide comments if any.:

Assessments

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

Please provide comments if any.:

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

Please provide comments if any.:

47 In the interests of transparency the Department would like to publish the responses to this survey. Personal information, including email addresses, will not be published. Do you provide consent for your response to be published?

Yes

Equality/Section 75 Questions

48 What is your age range?

Not Answered

49 What is your ethnic group?

Please state:

50 What is your religious belief?

Religion:

51 What is your marital status?

Marital Status:

52 Do you have a disability?

Not Answered

Not Answered

53 What is your sex?

Not Answered

Sexual orientation - other:

54 Which of the following options best describes how you think of yourself?

Not Answered

55 Are you a dependant carer?

Not Answered