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WWF *for a living planet*

Roger Downey,
Acting Director of Finance
Department for Regional Development
Room 4.27, Clarence Court
10-18 Adelaide Street
Belfast
BT2 8GB

Reference: DRD budget 2010/11

15 February 2011

Dear Mr Downey,

WWF Northern Ireland appreciates the opportunity to comment on the draft DRD budget for 2011-15.

In relation to transport spending, WWF Northern Ireland is concerned at the disproportionate allocation of funding for road building. For example, as outlined in paragraph 14 on page 6 of the draft budget, of the 2010 capital investment budget of over £2 billion, over £1.1 billion has been earmarked for roads, with around £185 million for public transport and over £665 million for water and sewerage services. WWF Northern Ireland regards this split where approximately 83% of the money to be spent on transport is allocated to roads, with the remaining 17% on public transport, as wholly unsatisfactory. According to page 7 of the draft budget, approximately 70% of Roads Service allocation is tied up in two major road schemes - the A5 and A8, which WWF Northern Ireland regards as disproportionate, even accounting for the £400 million the Republic of Ireland is allocating towards these schemes.

WWF Northern Ireland recognises that DRD has taken some very positive steps in recent times, most notably the successful joint bid with DoE, managed by SNIFFER, to OLEV for electric vehicle recharging infrastructure, However, overall, WWF Northern Ireland regards the budgetary proposals from DRD as completely imbalanced in favour of road building, to the detriment of more sustainable transport options. For example, looking at the proposed capital spend in 2013/14 £387.4 million is allocated for roads and only £13.3 million on 'transport' - an approximate split of 96% of spending on roads with approximately 4% on remaining transport options. WWF Northern Ireland regards this as wholly inappropriate and totally unsatisfactory. This contrasts with the higher priority given to public transport in the Republic of Ireland which in the 2007-2013 National Development Plan(1) (NDP) pledged just under €13 billion for public transport out of a total of €33 billion on infrastructure. There is an even sharper contrast with the plans announced by the Danish government in December 2008 (2) of a "*green traffic initiative*" featuring infrastructure investments and transport measures costing DKr150bn (€20bn) over the next decade. According to the Danish plan, about two-thirds of the total will be spent on "*renovating, improving and developing the railway network*" with the aim of converting motorists to public transport. High emissions charges, road pricing, and financial incentives for fuel-efficiency are among a raft of additional measures. Similar strategic thinking and investment in greater public transport would be welcome in Northern Ireland.

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(1) http://www.ndp.ie/documents/ndp2007-2013/NDP-2007-2013-English.pdf

(2) http://www.endseurope.com/index.cfm?go=17237&view=print

This imbalance in favour of roads has many potentially negative impacts.

Emissions from road transport represented 28.2% of Northern Ireland's total Carbon Dioxide (CO_2) emissions in 2008[3], an increase of 39.5% since 1990[3], second only to energy production (30%). Cars were responsible for 54% of the CO_2 emissions from the road transport sector in 2008 while HGVs contributed 36%. By contrast, road transport represents only 22% of the UK's total CO_2 emissions which grew by only 7% since 1990, so there is clearly a disproportionate problem in Northern Ireland[3]. At both a UK level and a Northern Ireland level, around 15% of an individual's ecological footprint is attributable to personal transport[4]. Clearly we need to change our travel patterns, if we are to achieve a One Planet Future[5].

Generally, Northern Ireland's current system of energy production and consumption is wholly unsustainable, not least because of the volatility in oil prices, but also because of our over reliance on imported fossil fuels - with approximately 99% of our primary energy needs met from imports [6] - and the issues surrounding peak oil, diminishing oil resources and increasing demand. This is particularly the case in the transport sector, where liquid hydrocarbon fuels derived from crude oil provide 95% of the primary energy consumed in the transport sector worldwide[7]. There is no other sector which is so utterly reliant on a single source of primary energy. Accounting for the volatility in the price of oil, as illustrated by the variation in oil price in 2008 from $147 a barrel in July to approximately $40 a barrel by the end of 2008, as well as the issues surrounding peak oil, most notable the trend for increasing demand and decreasing availability, this position is clearly unsustainable.

The shortcomings in our transport system also cost us money, as was illustrated by PA Consulting, who claimed that congestion costs the Northern Ireland economy over £250 million a year[8].

The need for and benefits of greater investment in public transport was also highlighted by the PricewaterhouseCoopers report "*Bridging the Gap*" [9] which found that the £80 million investment in new rolling stock and station refurbishment for Northern Ireland Railways

"*helped to drive a 60% increase in usage since 2002*"

and that the change to Metro was

"*the catalyst for a 15% increase in bus ridership in Greater Belfast*".

As such it seems clear that increasing investment in public transport works - a very significant point given that the report also found that

"*On a per capita basis, England, Scotland, Wales and the Republic of Ireland have been investing at least twice as much as Northern Ireland in public transport (and in the case of Scotland five times as much).*".

It seems clear therefore that avoiding and/or reducing some of the costs of unsustainable transport (including congestion, pollution and negative health impacts) while also saving money, and creating jobs by investing in the move to a more sustainable transport system, offers a number of potential win-win opportunities.

There are also important social equity issues around transport. There are now 900,000 vehicles registered in Northern Ireland for a population of 1.7 million yet 50% of households in areas of Belfast and 20.5% of rural residents do not have access to a motor vehicle. Thirty-nine percent of women in Northern Ireland do not have a full driving licence.

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(3) AEA Greenhouse Gas Inventories for England, Scotland Wales and Northern Ireland 1990-2008 September 2010 available at http://www.airquality.co.uk/reports/cat07/1009070945_DA_GHGI_report_2008_maintext_Issue_1.pdf

(4) Counting Consumption WWF 2006 http://www.wwf.org.uk/filelibrary/pdf/countingconsumption.pdf

(5) One Planet Mobility WWF, CSCP and C4S available at www.wwf.org.uk/oneplanetmobilty

(6) DETI Executive Summary of a report on the assessment of the potential for bioenergy development in Northern Ireland 2008

(7) World Energy Outlook 2006

(8) PA Consulting "Northern Ireland economy burns £250 million a year in roads slow lane" (2008)

(9) PricewaterhouseCoopers Bridging the Gap Transforming Public Transport in Northern Ireland June 2009

Urban areas are affected by vehicle related air pollution which can contribute to respiratory disease especially amongst vulnerable groups such as the elderly. Disadvantaged urban areas tend to be characterised by high traffic volume, with residents at increased risk of road traffic accidents.

Research by the Tyndall Centre for Climate Change suggests that if we were to enforce the current 70 mph speed limit there would be a 3% reduction in greenhouse gas emissions from road transport.

Research by the Consumer Council suggests that only three in ten people here use bus services regularly, and less than one in ten uses train services. The Survey suggested that cost, frequency, choice, safety and reliability should be the priorities for public transport here.

There is significant potential for change in travel behaviour. Research by the Department for Transport showed that:

- Over 90% of adults consider that everyone should be encouraged to walk to help their health, help the environment and to ease congestion;
- Four in ten car users say they would walk more if congestion charging was introduced, if it was more expensive to park and if it was more difficult to park; and,
- Three in ten car users say they would reduce their car use if there was better provision for cyclists; such as more cycle tracks, cycle lanes, and parking facilities.

In Northern Ireland 20% of cars in peak time are taking children to school. We know around 40% of young people would prefer to cycle to school but only 3% do so.

A major concern, which leads to people not cycling, is a perception that roads, particularly arterial roads, are unsafe. A default 20mph or lower speed limit in all urban areas, could bring a number of benefits as slower speeds help to improve road safety, encourage walking, cycling and public transport use, reduce fuel consumption and CO_2 emissions and reduce noise. The introduction of 20mph limits could reduce all casualties by 60% and child casualties by 70%.

Footpaths to Sustainability estimated that if the number of short journeys made by walking was increased by 20% (on 2002 levels) by 2012 (the target for the Northern Ireland Walking Action Plan), a 5% reduction in the carbon footprint of transport would be delivered. If every short journey was made on foot or bike the ecological and carbon footprints of transport would reduce by 16% by 2024.

Spatial planning plays a particularly important role in shaping individuals' behaviour with regard to travel and transport. It is, therefore, imperative that a co-ordinated approach be taken when considering land-use and transport. Planners should only make decisions after they have considered how the development will contribute to mitigation efforts and whether the site and design is appropriate given the predicted impacts of climate change in Northern Ireland.

A review of the planning system in Northern Ireland is currently being conducted while a revised policy for development in rural areas was recently released. We must increase the density of housing in major settlements and concentrate future rural development in established settlements to reduce individuals' need to travel by car and to provide a larger customer base for public transport operators. Public transport links should be incorporated into new developments, with new bus stops and services provided in growing villages and towns in a pro-active and innovative manner.

There are now numerous examples of policies aimed at improving travel choice and reducing car use. Invariably these include a mixture of 'carrots' (public transport improvements, park and ride, and improvements to pedestrian and cycling networks), and 'sticks' (parking policy, re-allocation of road space and controls on vehicle access). Nottingham (-1.8%), Perth (Australia) (-4%) and Rome (-7%) are examples of cities where car use has been reduced.

Each of these cities have implemented traffic restraint policies including those aimed at reducing urban sprawl and invested in new public transport and service enhancements with transit orientated development, including the focusing of new development around suburban stations. Perth has also implemented a work-place parking levy while Nottingham and Rome have implemented travel plans. In

addition Rome has reduced city parking and re-allocated these spaces at park and ride sites in combination with access controls.

A well planned transport system can facilitate social connections which are important for mental health. Neighbourhood designs most likely to promote social networks are those that are mixed use and pedestrian orientated, enabling residents to perform daily activities without the use of a car. As traffic volumes increase, people's sense of neighbourliness decreases.

A new rural transport policy is needed which ensures that the problems of the immobile socially excluded are not analysed or tackled in isolation from the mobile included within a wider canvass of growing sustainable rural communities that balances environmental, social and economic sustainability and which encourages rural dwellers to use viable alternatives to the car.

The people of Northern Ireland are asking for leadership from the Assembly. A survey conducted in 2008 by Sustainable Northern Ireland for the Northern Ireland Climate Change Impacts Programme revealed that,

"92% of respondents were willing to make changes to their lifestyles, especially if encouraged to do so by strong government leadership."

In summary, WWF Northern Ireland believes that the indicative spend figures for transport modes should be revised to ensure that at least 50% of Government investment goes to sustainable transport measures from the next budget onwards.

WWF Northern Ireland notes with concern that the DRD Draft Budget 2011-2015 details cuts in planned investment of approximately 25% in both 2012-13 and 2013-14. Given the historic underfunding in water and sewerage infrastructure, it is essential that Northern Ireland Water continue to sustain necessary levels of investment to upgrade and improve the delivery of water and sewerage services. The need for increased investment has been highlighted by interruptions to water supplies, such as the recent events resulting from the freeze/thaw conditions during the Christmas period. Until suitable alternative sources of revenue are investigated and implemented, it is important that NI Water continue to receive the support from DRD to realise the targets identified by the Utility Regulator and to ensure compliance with appropriate Environmental Regulations, including measures set out in Northern Ireland Environment Agency's River Basin Management Plans under the EU Water Framework Directive 2000/60/EC.

WWF Northern Ireland is supportive of the introduction of direct charging for water services in the form of socially responsible water metering. This approach would raise much needed revenue that better reflects the true value of water and addresses the underinvestment in infrastructure whilst incentivising more efficient use of water. We refer to the Programme for Government which states under PSA 15 the objective to implement sustainable and acceptable funding arrangements for water and sewerage services by 2010. To that end, Article 9 of the EU Water Framework Directive calls for,

"*water pricing policies that provide adequate incentives for users to use water resources efficiently and thereby contribute to the environmental objectives [for good quality status] of this Directive"*

and which provide,

"an adequate contribution of the different water uses, disaggregated into at least households and agriculture, to the recovery of the costs of water services…"

By adopting a socially responsible water metering approach, with built-in tariff mechanisms to secure sustainability while simultaneously addressing affordability [(10)] , low income and vulnerable households would be protected from intolerable financial burdens. For further information, please contact WWF Northern Ireland.

(10) Waste Not, Want Not: Sustainable Water Tariffs, A Report by Paul Herrington for WWF-UK

Whilst the Draft Budget proposal suggests that the cuts to water and sewerage services are based on the Regulator's assessment, no information is provided about the specific impact of these cuts. This makes it very difficult to comment. More details should be made available, in the interests of transparency, about which elements previously agreed by the Executive and set out in Social and Environmental Guidance for Water and Sewerage Services, will no longer be supported by DRD.

Finally, WWF Northern Ireland welcomes the Department's intentions to work with NI Water, the Regulator and other stakeholders to undertake any necessary re-prioritisation of Determination targets. As key environmental stakeholders with considerable experience in influencing water policy, WWF Northern Ireland would be keen to participate in any further re-prioritisation decisions.

Yours Faithfully

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Policy Officer WWF Northern Ireland