



Eastern Transport Plan 2035 consultation

Response by the Consumer Council

30 October 2023

CONTENTS

1.	EXECUTIVE SUMMARY	2
2.	ABOUT US	3
3.	COMMENT ON THE PLAN APPROACH	4
4.	CONCLUSION	8
5.	CONTACT DETAILS	8
6.	ANNEX 1- CONSUMER COUNCIL TRANSPORT RESEARCH LINKS	9

1. EXECUTIVE SUMMARY

The role of the Consumer Council is to promote and safeguard the interests of all consumers in Northern Ireland. We welcome the opportunity to respond to this consultation on the Eastern Transport Plan 2035 (“the Plan”).

In our response we focus on the role of consumers in the Plan and bring forward some of the insights that we have gathered relating to the vision, challenges and objectives of the Plan. As the users of transport, consumers will be expected and at times required, to change their behaviour. Before asking consumers to alter their lifestyles it will be important to have robust consumer protections and suitable transport alternatives in place.

Engaging with consumers and having a strong understanding of consumer attitudes will be important for the Plan to succeed. The Consumer Council has already undertaken consumer research in this area and through our complaints function understand the transport issues that concern consumers. Consumers have told us that they are aware of the need for the transport sector to reduce its carbon emissions but they expect government and the transport sector to take the lead in providing viable alternatives to their use of the private car.

In development and implementing the Plan it is essential that policies, projects and infrastructure developments benefit consumers, and those that can be undertaken at low or no cost should be prioritised. It is also essential that the needs of consumers in vulnerable circumstances, including those on low incomes, of pensionable age, consumers who are disabled or living with long-term health conditions, and those living in rural areas, are prioritised.

For the Plan to succeed a strategic approach is required. When planning policies, projects and infrastructure developments the requirement for public sector support, market demand, subsidy control, the environmental impact, the impact on consumer vulnerability, and the employment impact must all be assessed.

Good communication is also vital to the success of the Plan. Consumers are clear that they do not like proposals that appear to be punishing their existing transport choices. Therefore, it is vital that consumers understand the benefits deriving from the Plan for themselves and their local communities. It is also vital that if tough choices are to be made that the reasons for those choices are adequately explained.

The Plan will not sit in isolation. One of the key challenges for the Plan is to make sure that its prioritisation, planning, and delivery align with existing and developing plans in related sectors. This means policy in planning of the built and natural environment, energy, public transport, economic development and most significantly Northern Ireland wide transport planning.

The Consumer Council is committed to working with the Department for Infrastructure (DfI) or any other interested industry stakeholder to provide consumer insights and drive behavioural change that combined with infrastructure and technological developments will benefit consumers.

Regarding the vision, challenges and objectives that are laid out in the Plan:

- The Consumer Council recognises the aspiration contained in the vision for the Plan as aligning with regional strategies such as the NI Executive 2021 Programme for Government Draft Outcomes Framework. The vision also aligns with what consumers have told us during our research, such as the need to integrate different transport modes to deal with complex travel

needs. However, for consumers to buy into the Plan's vision they need to be involved in its design. We suggest that before the vision is finalised work is undertaken to enable the public to be involved in its co-design.

Our research has shown that consumers want changes to the way they travel to be affordable and fair to all. The vision should also reflect that the transport system must be resilient to economic, social, and environmental upheavals and that it must be accessible to persons with disabilities and reduced mobility.

- The Consumer Council recognises and agrees with both the wider societal challenges and the transport challenges stated in the consultation. We would suggest adding the challenges of ensuring the transport network is accessible to people with disabilities and reduced mobility, is affordable for users and is safe.
- The Consumer Council recognises and agree with the seven objectives stated in the Plan and would suggest adding consumer engagement/co-design with citizens, improving the accessibility for people with a disability and reduced mobility, the integration of different modes of travel by using the Mobility as a Service (MaaS) concept and ensuring consumers are protected during the transition to a new transport network.

The Consumer Council has undertaken consumer research and surveys which provide insights that will help inform the design and implementation of the Plan. A list of recent insight reports is annexed to this response and we would be happy to discuss these reports with DfI.

2. ABOUT US

The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order (The Order) 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland.

We are an insight-led, evidence based organisation:

- Providing consumers with expert advice and confidential guidance.
- Engaging with government, regulators and consumer bodies to influence public policy.
- Empowering consumers with the information and tools to build confidence and knowledge.
- Investigating and resolving consumer complaints under statutory and non-statutory functions.
- Undertaking best practice research to identify and quantify emerging risks to consumers.
- Campaigning for market reform as an advocate for consumer choice and protection.

We have specific statutory duties in relation to energy, postal services, transport, water and sewerage, and food affordability and accessibility. These include considering consumer complaints and enquiries, carrying out research, and educating and informing consumers.

Article 5(1) of the Order requires the Consumer Council to: "consider and, where it appears to it to be desirable, make recommendations with respect to any matter affecting road or railway passenger transport services and facilities in Northern Ireland and services and facilities provided for passengers travelling to and from Northern Ireland."

We undertake this function by working in partnership with the NI Government, Translink, Northern Ireland air and ferry port operators, airlines, ferry companies and other stakeholder organisations. We handle complaints against transport service operators and use these, along with research, to inform our recommendations.

We are also a designated body under the Rural Needs Act 2016 and Section 75 of the Northern Ireland Act 1998. In this role, we aim to ensure government policies recognise consumer needs in rural areas and promote equality of opportunity and good relations across a range of equality categories. Across all our areas of work, we pay particular regard to consumers:

- who are disabled or chronically sick;
- who are of pensionable age;
- who are on low incomes; and
- who live in rural areas.

We use a set of eight guiding principles (Figure 1) developed by the United Nations to:

- assess where the consumer interest lies; and
- develop and communicate our policies, interventions and support.

These provide an agreed framework through which we approach regulatory and policy work.

Figure 1: Guiding Principles



The principles ensure we apply a consistent approach across our statutory and non-statutory functions, and in all our engagement with consumers and stakeholders.

3. COMMENT ON THE PLAN APPROACH

In this section we state our position on the challenges, vision and objectives and give examples from our recent consumer research that provide insight into the current consumer attitude towards them. We also suggest some further issues that need to be considered in the development of the Plan.

3.1 The problems we need to solve

We recognise and agree with both the wider societal challenges and the transport challenges stated in the consultation.

Societal challenges:

- Tackling Climate Change.
 - The Consumer Council Corporate Plan 2021-24 identifies decarbonisation as a key consumer priority.¹ Decarbonising Northern Ireland's transport sector is important to not only assist in tackling climate change but also to improve air quality.
- Protect the natural and built environment.
 - 56% of consumers support the promotion of cycling and 56% of increasing the number of cycle lanes²
 - 65% of consumers support traffic calming schemes to accommodate other road users³
- Sustainable economic growth
 - 63% of consumers say investment in public transport in Northern Ireland is a priority (major, 25%; minor, 38%).⁴
 - Only 28% of businesses agree that currently public transport is good enough to be a viable alternative to bringing your car into towns and cities in Northern Ireland (28% of consumers agree).⁵
- Support healthy, safe and inclusive communities
 - 60% of consumers are supportive of an Ultra Low Emission Zone (ULEZ) in Belfast City Centre (28% are unsupportive, 12% are undecided).⁶
 - 51% of consumers support having 'low traffic neighbourhoods' where vehicle access is restricted.⁷
 - 30% support congestion charging for those driving into cities and large towns in Northern Ireland.⁸
 - 23% of consumers support increasing the cost of carparking to deter people from driving into towns and cities.⁹

¹ [Consumer Council Corporate Plan 2021-24](#)

² <https://www.consumerCouncil.org.uk/policy-research/publications/decarbonisation-transport-2023-full-report-part-1>

³ *ibid*

⁴ *ibid*

⁵ *ibid*

⁶ *ibid*

⁷ *ibid*

Transport Specific challenges:

- Cycle lanes
 - 56% of consumers support increasing the number of cycle lanes.¹⁰
- Improve public transport
 - 25% of consumers say they are dependent on public transport but most consumers say they are not (75%).¹¹
 - Less than half of consumers believe that public transport in Northern Ireland is affordable (49%), convenient (45%) or is frequent enough to meet their needs (36%).¹²
 - 29% say poor service availability/frequency is the single biggest barrier to using public transport (locationally inconvenient to access public transport, 20%: cost, 15%).¹³
- Rural areas
 - Living in a rural area with a lack of nearby public transport is the most common reason consumers believe it would be difficult to reduce their use of private cars (25%).¹⁴
- Private cars
 - 61% believe that it would be difficult to reduce their use of private cars (easy, 28%).¹⁵ This rose to 78% for those living in rural areas.

We suggest the additional challenges of:

Being inclusive

To be inclusive a transport network must address the needs of all citizens. Particular regard needs to be given to the vulnerable, disabled, persons with reduced mobility and rural users. An inclusive transport system can enhance and improve the lives of people who are socially isolated or otherwise disadvantaged by the lack of accessibility of transport systems. An inclusive transport system will be conveniently located, affordable, easy to plan for and use, and physically accessible to all. Many positive steps have already been taken to achieve this, particularly in public transport, but more needs to be done.

Protecting consumers

The low cost aviation sector provides an example of how new service delivery models combined with access through digital platforms can leave to consumer detriment with limited redress when things go wrong. As transport systems become more complex and rely more and on digital platforms it is essential that consumers have the information they need to make the right choices, are protected from poor customer service and have access to redress when they do not receive the

¹⁰ ibid

¹¹ ibid

¹² ibid

¹³ ibid

¹⁴ ibid

¹⁵ ibid

service to which they are entitled. Effective regulation will be required to ensure that new and emerging infrastructure and technologies provide this.

Safety

The safety of the public must be an essential feature of a transport network. Effective regulation will be required to ensure that new and emerging infrastructure and technologies provide this.

3.2 The end goal we want to achieve

We agree with the vision for the plan. We would add that in stating the need to be inclusive it must be understood that this means that the transport system is affordable, promotes social equality and is physically accessible both in design, simplicity of use and convenience for all users, including people who are vulnerable, disabled, have reduced mobility or are rural dwellers.

3.3 How we will get there

We recognise and agree with the seven objectives stated in the Plan. We have identified additional objectives that will help the fulfilment of the Plan's vision.

Consumer engagement

The Consumer Council has long advocated that comprehensive engagement with consumers is fundamental to the design and delivery of policy and services. Putting consumers at the centre of decisions is vital to ensure that we are delivering what really matters to them and we achieve the behavioural change needed to meet the Plan's vision. To enable this, good consumer engagement practice is critical.

We use consumer engagement to refer to a range of opportunities to gain insight and understanding from consumers and the communities that services are designed and provided for. The benefits of collaborative engagement can deliver are well evidenced. For example, in Northern Ireland Water's PC21, the Utility Regulator concluded the consumer engagement delivered "*has been beneficial to all parties and should enable improved delivery of service to the consumer*".¹⁶ A further example of collaborative work is provided by the report 'Empowering consumers',¹⁷ which was a joint consumer engagement research project between the Consumer Council, NIE Networks, Department for the Economy and the Utility Regulator.

Engagement should be ongoing and embedded in an organisation's business as usual activity. Companies and government departments must move away from the process of gathering consumer views to inform set points of policy development. We need to know what consumers really experience and collect information on how that experience is changing. Only by doing this can we target the work to minimise detriment and maximise consumer benefit.

In developing the Plan, DfI should consider localised and specific consumer participation in the design and delivery of schemes to support its consumer engagement. The involvement of affected communities must be built into the development of plans through early dialogue with these communities, co-design, co-production, co-delivery, and co-assessment.

We suggest an additional objective of:

¹⁶ [PC21 FD - Main Report 02.00.pdf \(uregni.gov.uk\)](#)

¹⁷ [empowering-consumers-ceap-report-2016 \(nienetworks.co.uk\)](#)

- Developing a comprehensive and rolling annual programme of consumer engagement to facilitate the development of legislation, regulation and policy decisions that best serve consumer needs in the Plan.

Consumer communication

Good communication is also vital to the success of the Plan. Consumers are clear that they do not like proposals that appear to punish their existing transport choices. Therefore, it is vital consumers understand the benefits deriving from the Plan for themselves and their local communities. It is also vital that if tough choices are to be made that the reasons for those choices are adequately explained.

Northern Ireland consumers have told us that they need more information before deciding to change the way they travel. To begin to drive the behavioural change required, without first implementing an evidence-based, honest, two-way conversation with consumers, endangers attempts to achieve the vision of the Plan.

This communication must include comprehensive advice, information and awareness campaigns, proactive wrap-around support, financial incentives, and statutory protections. Campaign messaging should be simple, from a trustworthy source, and easy to access.

It is also important to convey the correct message about the strategic direction when communicating with consumers. For example, if we truly wish to promote active travel the Plan and subsequent communication should be unequivocal about this aim and avoid references to active travel “where space permits,” “where possible” and “where required” as is used in the consultation document for the Plan.

Improve the accessibility for people with a disability and reduced mobility.

The Consumer Council welcomes the important changes that have occurred in the last number of years to make passenger transport within NI more accessible, particularly for older consumers and people with a disability. Unfortunately, there continue to be barriers preventing people from fully utilising the available services.

We suggest an additional objective of:

- A transport plan that ensures the accessibility of the public and wider transport network by improving physical access and enhancing the customer experience and information for transport users with a disability or reduced mobility.

Integrating different modes of travel by developing the Mobility as a Service (MaaS) concept.

Consumers have told us that many of their journeys are complex and require flexible options. The general consumer sentiment is that for this reason it will be difficult to reduce their use of private cars and increase their use of public transport. This presents a challenge for public transport to integrate its services with other modes of travel.

The Mobility as a Service (MaaS) model is the integration of transport and transport-related services into a single, comprehensive, and on-demand mobility service.¹⁸ The user is placed in the centre of the MaaS service with an ability to plan, book and pay for multimodal journeys tailored to the user's preferences and personal choices. In 2023 the Consumer Council commissioned a report by Steer into what Northern Ireland can learn from MaaS projects undertaken in other regions.¹⁹

We suggest an additional objective of:

- Integrating new and existing transport modes through the use of technology.

4. CONCLUSION

The Consumer Council welcomes the opportunity to respond to the Eastern Transport Plan 2035, draft Vision and Objectives. We recognise the challenges it contains and support the draft vision and objectives contained in the Plan.

Consumer engagement is vital to the success of any plan that requires consumer to change their behaviour and we recommend DfI undertake a comprehensive and ongoing consumer engagement programme. The Consumer Council has already undertaken a range of consumer research and surveys in transport, which will help inform the Plan. We would welcome the opportunity to work with DfI to bring the consumer perspective to the Plan and we suggest further engagement between us on this issue.

5. CONTACT DETAILS

If you require more information please contact Richard Williams – Head of Policy (Transport), on 029 9025 1649, or email: Richard.williams@consumercouncil.org.uk.

¹⁸ [What is MaaS? – MAAS-Alliance](#)

¹⁹ <https://www.consumercouncil.org.uk/policy-research/publications/transport-integration-and-maas-report-what-can-northern-ireland-learn>

6. ANNEX 1

Links to Consumer Council transport research for 2022 and 2023

1. Decarbonisation of Transport 2023 - Summary Report <https://www.consumercouncil.org.uk/policy-research/publications/decarbonisation-transport-2023-summary-report>
2. Models for Transport Decarbonisation Information and Advice Report <https://www.consumercouncil.org.uk/policy-research/publications/models-transport-decarbonisation-information-and-advice-report>
3. Transport integration and MaaS Report: What can Northern Ireland learn from elsewhere? <https://www.consumercouncil.org.uk/policy-research/publications/transport-integration-and-maas-report-what-can-northern-ireland-learn>
4. Decarbonisation of Transport 2023 - Full report (part 1) <https://www.consumercouncil.org.uk/policy-research/publications/decarbonisation-transport-2023-full-report-part-1>
5. Decarbonisation of Transport 2023 - Full report (part 2) <https://www.consumercouncil.org.uk/policy-research/publications/decarbonisation-transport-2023-full-report-part-2>
6. FUTURE OF TRANSPORT: Survey of Northern Ireland Consumers (April 2022) [2 \(consumercouncil.org.uk\)](https://www.consumercouncil.org.uk)



The Consumer Council

Seatem House, Floor 3
28 - 32 Alfred Street
Belfast, BT2 8EN

T: 028 9025 1600
F: 028 9025 1663
E: info@consumercouncil.org.uk
W: www.consumercouncil.org.uk