

Mr Andrew Grieve
Transportation Policy Division
Department for Regional Development
Room 312 Clarence House
Adelaide Street
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8 March 2012

Dear Mr Grieve

Response to 'Building an Active Travel Future for Northern Ireland'

Thank you for the invitation to respond to the Department for Regional Development's (DRD's) consultation on 'Building an Active Travel Future for Northern Ireland' (the 'Active Travel' strategy).

The Office of the Northern Ireland Commissioner for Children and Young People (NICCY) was created in accordance with The Commissioner for Children and Young People (Northern Ireland) Order 2003 to safeguard and promote the rights and best interests of children and young people in Northern Ireland.

The powers and duties of the Commissioner include promoting awareness and understanding of children's rights; keeping under review the adequacy and effectiveness of law, practice and services relating to the rights and best interests of children; assisting with individual complaints; bringing or intervening in legal proceedings; and conducting investigations. The remit of the Office is children and young people from birth up to 18 years, or 21 years where a young person is care experienced or has a disability.

The Commissioner's response to the consultation is not intended to be comprehensive and does not provide answers to the range of consultation questions regarding the draft strategy, but instead focuses on the issue of joined up working with the Department of Education. Education policy and service delivery is a key focus of the Commissioner's work within her monitoring and advisory role. The Office has a particular interest in the Minister for Education's current strategic focus on the objective of creating a network of sustainable schools, as evidenced through the recently completed school viability audits; the area planning exercise commissioned to the



Education and Library Boards in conjunction with the Catholic Council for Maintained Schools; and the implementation of the Entitlement Framework.

We note that one of the objectives of the draft 'Active Travel' strategy is to promote active travel of children of school age. In this regard, specific targets include ensuring that 36% of primary school pupils and 22% of secondary schools pupils are walking or cycling to school as their main mode of travel by 2015; with a respective increase to 40% and 25% by 2019. We note that this commitment is repeated in the draft Programme for Government (PfG), and the associated targets are reflected in the 2012-2015 PfG milestones.

It is indicated in the draft 'Active Travel' strategy that DRD is working across Government departments and with the *"education sector and young people"* (page 20) to address the barriers to active travel. It is not clear within the information provided whether DRD officials have had discussions with DE officials at a policy level regarding the potential impact of DE's objectives concerning the creation of a sustainable network of schools. We recommend that the DRD, in conjunction with the Department of Education, clarify how the Departments are working together on common issues regarding the strategic planning of the schools' estate. In particular, it will be important to clarify how the DRD targets to increase the percentage of pupils walking/cycling to school will take account of the area planning exercise. Have DRD officials been consulted by DE and/or the Education and Library Boards regarding area planning to date, given that one of the objectives in the terms of reference for area planning includes ensuring *"a network of sustainable schools, within reasonable travelling distance for pupils and capable of delivering effectively the revised curriculum and, in post-primary schools, the Entitlement Framework"*?

DRD should additionally consider how the 'Active Travel' strategy objectives can support, and be supported through, the implementation of the entitlement framework, with particular reference to increased sharing of classes across schools.

The 'Active Travel' strategy must also account for the particular circumstances and experiences of both children living in rural areas and children passing through areas of community tension in their journey to/from school. Currently, the capacity of many such children to safely walk/cycle to school is limited. Future DE policy decisions regarding area planning may have a further impact on such children and young people. These issues should be taken into account through joined up working between DRD and DE/ the education and library boards. In addition, DRD should be working closely with OFMDFM in the final development of the Cohesion, Sharing and

Integration Strategy, with particular regard to the specific barriers to active travel for children journeying to/from school via areas of community tension.

Finally, we recommend that DRD ensure that the strategy proposals do not have a negative impact on the provision of free school transport, particularly for pupils from lower income families. Given that the statutory walking distances are currently set at two miles for primary school pupils and three miles for post primary pupils, the Commissioner would be concerned by any plans that may ultimately reduce the eligibility of pupils for free school transport, particularly those pupils who are 'living the impact' of economic disadvantage.

If the Department requires any clarification regarding our comments, or would like to discuss the issues in further detail, please contact Caroline Cunningham, Policy and Research Officer, by telephone 90316384/311616 or by email caroline@niccy.org.

Yours sincerely



Mairéad McCafferty
Chief Executive