

48

Campbell, Jacqui

From: Roads Eastern Srit
Sent: 11 March 2015 09:22
To: 'Arthur Acheson'
Subject: York Street Interchange Formal Consultation

Arthur

Thank you for your response to the consultation on the proposals for the York Street Interchange. Your views have been recorded as part of this process and will contribute to the decision on whether The Department should hold a Public Inquiry into the scheme.

Regards

Colin Pentland

Strategic Road Improvements

DRD - Eastern Division, Hydebank, 4 Hospital Road, Belfast BT8 8JL.

48

Campbell, Jacqui

From: Arthur Acheson [REDACTED]
Sent: 10 March 2015 16:49
To: Roads Eastern Srit
Subject: RE: YORK STREET INTERCHANGE BELFAST
Attachments: York Street Interchange.docx

Dear Jacqui,

I attach a slightly amended version that removes one or two typographical errors in my original and I should appreciate it if you would please substitute this for the original.

There is no change in the substance of the submission.

Many thanks.

Yours sincerely

Arthur Acheson

From: roads.sriteastern@drdni.gov.uk
To: [REDACTED]
Date: Tue, 10 Mar 2015 16:14:47 +0000
Subject: RE: YORK STREET INTERCHANGE BELFAST

Mr Acheson
This is just confirmation that your email has been received. A formal acknowledgement will follow shortly

Regards
Jacqui Campbel
ISRIT

From: Arthur Acheson [REDACTED]
Sent: 10 March 2015 16:02
To: Roads Eastern Srit
Subject: YORK STREET INTERCHANGE BELFAST

Dear Sir or Madam,

Please acknowledge timely receipt of my attached response to the public consultation.

Yours faithfully

Arthur Acheson
Architect + Civic Planner

York Street Interchange

Co-financed by the European Union
Trans-European Transport Network (TEN-T)

RESPONSE TO SIX WEEK PUBLIC CONSULTATION

Arthur Acheson BSc MArch MRTPI AoU

Registered Architect, Chartered Town Planner, Academician of the Academy of Urbanism

INTRODUCTION

The scheme as proposed and described is disappointing. It is essentially single function infrastructure.

HM TREASURY GREEN BOOK

When examined in accordance with HM Treasury Green Book, the proposal fails to consider alternative means of dealing with the movements of people rather than vehicles.

The Green Book is often misunderstood and used as a set of formulae to prove that one particular (often capital build) option is better than a "do-nothing" option or any of the other options that may be under consideration.

However, the Green Book is a much more fundamental document. It calls on promoters of schemes to "build in flexibility from the start". It requires consideration of "radical options". It requires early (and good) consultation. Its binding guidance includes the use of "pilot projects", "activities rather than projects", "recurrent as well as capital expenditure" and consideration of various different timescales.

EXAMPLES OF PILOT PROJECTS, RADICAL OPTIONS and BUILDING IN FLEXIBILITY

Creative consultation about the future of people moving in Northern Ireland would include action learning. Part of this happens naturally, simply by observation. I am an active user of the Interchange. I have used it frequently as a car driver and as a pedestrian. The York Street Interchange is very quiet between the hours of midnight and 6.00am. It is also very quiet on a typical Sunday. During school holidays the Interchange is considerably less busy than when schools are in session.

The active learning from these observations is that the volume of traffic peaks at certain times of day, largely caused by behaviour of people who find that their optimum means of travel is by private car through the Interchange. The optimum means of travel is dictated by a combination of convenience, comfort and cost. Pilot Projects can temporarily adjust the optimum. For example, it is already apparent that during holiday periods, evenings, nights and weekends the Interchange is fully sufficient in its present state and could be improved by the construction of buildings, parks and other amenities on the land around the streets, creating a better city district for all users.

Additional Pilot Projects which cost very little could include, for example, measurement of the busiest times on the Interchange (perhaps it is a December afternoon before Christmas) and the tailoring of techniques to encourage greater use of public transport during the busiest times. Funding bus and train journeys free for all at this time for a trial period (say a busy month) would indicate the difference that greater use of public transport makes to the Interchange. The

Department for Regional Development recognises the benefit of Pilot Projects, having used them to help to alleviate parking issues in Belfast City Centre during the pre-Christmas period. One year, the parking charges in selected parts of the city centre were removed from 4.30pm instead of from 6.00pm daily. A second Pilot Project a year later changed this to allow free parking and bus transfers from Park and Ride locations. Measuring the impact of such changes on the Interchange would be beneficial and if they are found to be of benefit, their cost could be assessed against some or all of the capital works proposed. Increasing the frequency of public transport would also be a worthwhile pilot project for the Northern Ireland Government and Belfast City Council which must act in unison for the city.

Co-finance by the European Union will recognise the most important aspects of the scheme which are defined by the objectives of the scheme which are stated in the Environmental Statement as **Environment, Safety, Economy, Accessibility and Integration.**

ENVIRONMENT

The Environmental Statement describes the local environment as a "degraded urban landscape" whose "main characteristic is the legacy of 20th century transport planning which has changed the urban fabric". The existing junction degraded the urban landscape and the proposals continue the degradation. The Environmental Statement refers to the existing scheme as having caused "a certain degree of severance" but the promoters know that urban design analysis refers to this junction and its effects on the neighbourhoods as a "Shatter Zone", which is hardly a complimentary description and certainly emphasises the amount of disconnection which has been caused by major road infrastructure created in the last century. Not only disconnection, but also proximity to residential and commercial buildings of heavy infrastructure which is at times as high as the eaves of the adjoining buildings, creates a second class environment that should not be tolerated in a 21st century city. Steps should be taken to reduce the impact of the existing infrastructure rather than using its existence as a measure that the proposals will be not much worse than the currently degraded urban environment, or in Environmental Statement parlance "slight adverse". Residents have proved recently that they are not content with "slight adverse"; they successfully judicially reviewed and stopped a stadium project in the west of the city.

SAFETY

No figures are produced in the environmental statement to describe the existing safety situation and that which is proposed. Certainly accidents occur at the Interchange and it would be important to see which areas of the existing road and street network are actually the most dangerous in terms of safety of people.

ECONOMY

The scope to produce a "lighter, quicker, cheaper" solution to the movement of people is not described. The Department for Regional Development has several tools in its toolkit in addition to the capital works programmes of Transport NI. For example, its Active Travel Unit recognised the importance of "places" – destinations that are worth travelling to – in contrast to "degraded urban environments", "links", "embankments", "gyratory junctions", "underpasses", "bridges", "corridors", "hubs", "gateways". The economy depends on good places that people enjoy and I have never heard any person expressing joy or delight about any of these technical names given to places, save perhaps a beautiful bridge.

ACCESSIBILITY

The proposals reduce accessibility to existing housing and commercial places. They also reduce the scope to walk or cycle directly from place to place, offering dull, uninspiring and actually dangerous walking places which by their dullness are unpopular and by their unpopularity are empty, creating huge temptation and opportunity for anti-social behaviour, making them unsafe to use and completing the vicious spiral downwards from ideal places to dangerous and injurious ones of which nobody can be proud.

INTEGRATION

The scheme is dis-integrational. It does not integrate with the bus stops, the stations, the normal streets, the footpaths. It degrades all other experiences to create smooth running in each strand of "spaghetti" in the junction.

Even with the smoothest spaghetti, just one break can cause chaos. Belfast is not unlike other cities in some respects – accidents happen and planned and unplanned road repairs happen too. However, it is unlike other cities in that roads are blocked from time to time for other reasons, related to protests and violence as well as threats of violence.

EMERGENCY SITUATIONS

Interestingly, I have never had a complaint about having to use the traffic signalled junctions referred to in the Environmental Statement, nor have I heard complaints from other road users, except when an emergency occurs, which blocks one or more lanes due to roadworks or a road traffic accident. When an emergency occurs in a city street it blocks perhaps one or two road junctions but the permeability of streets in the city centre and suburbs allows traffic to escape from the emergency and find other routes with relative ease. The nature of the strategic, single function, one directional lanes involved in the proposed Interchange is that there is no escape. To compensate for the lack of escape, additional technical fixes are used, involving large gantries with electronic signage with (often outdated) messages several miles before the junction, warning of long delays or adjusted speed limits. Technology cannot fix the situation and serious congestion occurs. The proposals will add technology which again cannot fix the lack of escape routes and will inevitably allow congestion during the difficult periods during an emergency.

It is recognised that technical fixes solve only a symptom and not the cause of a problem.

RECOMMENDATION - A WIDER GOVERNMENT COMMISSION

I recommend that due cognisance is given to HM Treasury Green Book by a wider, more strategic **Government Commission** than can exist in single section (Transport NI) of a single department (Regional Development). I recommend that the Commission be requested to examine the scheme under the binding guidance of the Green Book and that the Commission be charged with examining the proposals under their key objectives, **Environment, Safety, Economy, Accessibility and Integration**, in a more independent manner than paid consultants from a single department and taking cognisance of each of the following **Green Book** headings:

- **Building in flexibility from the start** – the scheme currently allows no flexibility for future transport systems and even requires construction of foundations for a future railway to be predicted and built into its heart, rather than having flexibility to accommodate futures.

- **Radical options** – the proposed scheme is not radical – it is traditional late 20th century based road planning , single function, with predominance of use by private vehicles and no endeavour to reduce the demand for travel by private cars.
- **Early consultation** – the proposals have given only half the recommended twelve week consultation period which would allow organisations and groups of people to properly acquaint themselves with the scheme and prepare consolidated responses. Instead the consultation has depended on the legislation which requires a statutory minimum of 6 weeks which was allowed. In my opinion this is inadequate.
- **Pilot projects** – the current scheme presents no evidence of pilot projects which would reduce carbon emissions, mitigate climate change and reduce the need for capital works on infrastructure. Pilot projects could open an attractive prospect of keeping the existing traffic arrangements, reducing the number of vehicles by clever encouragement and spending the £165 million not on tunnels and bridges and tarmac but on urban regeneration. Some previous bridges and overpasses are now being considered for removal – at more cost to the tax payer.
- **Activities rather than projects** - means to alleviate peak periods need to be considered, including attractive incentives for people to work from home at certain times, having more flexible times to commute, etc. Government as a major employer is in a key position to encourage more activities of this nature which would reduce the need for large capital projects of this nature.
- **Recurrent as well as capital expenditure** - consideration should be given to making public transport more accessible, with particular incentives to encourage public transport usage during peak periods at this Interchange and other similar areas of current congestion.
- **Consideration of various different timescales** – stewardship of the place now would indicate that at best any construction work will commence three years from now. Creative use of places meanwhile is essential to rebuild communities and the spirit of the place.

Arthur Acheson

Registered Architect

Chartered Town Planner

Academician of the Academy of Urbanism

10 March 2015